ROUTING SLIP

___ Improper Complaint ltr.

___ No Jurisdiction ltr.

X Respondent Notification ltr.

___ Complainant Notification ltr.

___ Other:

To KB from BJ on 4/25/84 for signature

To Docket from KBB on 4/25 for mailing

OK SHM
4/25/84

8504050002

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary

FROM: Office of General Counsel

DATE: April 23, 1984

SUBJECT: MUR 1667 - Memorandum to The Commission

The attached is submitted as an Agenda document for the Commission Meeting of April 24, 1984

Open Session

Closed Session XX

CIRCULATIONS		DISTRIBUTION	
48 Hour Tally Vote	[ ]	Compliance	[X]
Sensitive	[ ]		
Non-Sensitive	[ ]	Audit Matters	[ ]
24 Hour No Objection	[ ]	Litigation	[ ]
Sensitive	[ ]		
Non-Sensitive	[ ]	Closed MUR Letters	[ ]
Information	[ ]	Status Sheets	[ ]
Sensitive	[ ]		
Non-Sensitive	[ ]	Advisory Opinions	[ ]
Other	[X]	Other (see distribution below)	[ ]

CIRCULATE ON PINK PAPER

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 23, 1984

MEMORANDUM TO: The Commission

FROM: Charles N. Steele CNS/gmw
General Counsel

SUBJECT: MUR 1667

During Friday's Executive Session, the Commission discussed the General Counsel's Memorandum of April 19, 1984, regarding requests for extensions of time to respond to the complaint filed in MUR 1667. In that memorandum and again in the Executive Session, the Office of General Counsel advised the Commission that a preliminary review of the complaint and the amendment thereto raised concerns that certain entities should be noticed even though not specifically named as respondents by the complainant. The memorandum set forth the General Counsel's position that such entities should be sent copies of the complaint and its supplement and should be afforded fifteen days to respond to the complaint.

At the close of Friday's discussion, no formal vote was taken on this issue, however, this office understood that it was the sense of the Commission to proceed along the lines set forth by the General Counsel, that is, to send notices of the complaint to the first two categories of entities described above. Subsequently, Commissioner Reiche conveyed to the General Counsel that it was his belief that the Commission did not intend notices to be sent to those entities not explicitly named as respondents by the complainant.

It remains the General Counsel's view that notices must be sent in all cases where the complaint and attachments provide information indicating potential liability against specific entities, and not just in those cases where the complainant has chosen to call the involved party a respondent. Consequently, absent Commission instruction to the contrary, notification will be sent to all appropriate entities.

8504050005

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 23, 1984

MEMORANDUM

TO: John Gibson
Assistant Staff Director
Reports Analysis Division

THROUGH: John C. Surina
Staff Director

FROM: Charles N. Steele
General Counsel

SUBJECT: RETENTION BY THIS OFFICE OF DELEGATE COMMITTEE FILES

This Office requests that the Reports Analysis Division provide the Office of the General Counsel with all delegate committee files as filed by delegate committees for Walter Mondale. This Office agrees to maintain these files in a secure location and will be responsible for their safety. This Office further requests that additional material filed by these committees be forwarded as soon as practicable to Steve Mims.

If you have any questions regarding these requests, please contact Steve at 523-4000.

8504050007

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary

FROM: Office of General Counsel

DATE: April 19, 1984

SUBJECT: MUR 1667 - Memorandum to The Commission

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

Open Session _____

Closed Session _____

CIRCULATIONS		DISTRIBUTION	
48 Hour Tally Vote	[X]	Compliance	[X]
Sensitive	[X]		
Non-Sensitive	[ ]	Audit Matters	[ ]
24 Hour No Objection	[ ]	Litigation	[ ]
Sensitive	[ ]		
Non-Sensitive	[ ]	Closed MUR Letters	[ ]
Information	[ ]	Status Sheets	[ ]
Sensitive	[ ]		
Non-Sensitive	[ ]	Advisory Opinions	[ ]
		Other (see distribution below)	[ ]
Other	[ ]		

CIRCULATE ON PINK PAPER

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Mondale for President
2201 Wisconsin Avenue, N.W.
Washington, D.C. 20007
Telephone: 202-625-1600

MONDALE

April 19, 1984

HAND DELIVERED

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

RE: MUR 1667

Dear Mr. Steele:

This letter is to notify you that the Mondale for President Committee, Inc. (the "Committee") strongly disagrees with your conclusion that the additional 10-page brief and accompanying exhibits from the complainant in the above-referenced matter does not constitute an amendment to the complaint. The Committee is therefore entitled to 15 days from receipt to respond to these new allegations. This right to an opportunity to respond to an amended complaint is independent of our request for a 15-day extension of time which is routinely granted by the Office of General Counsel.

First, the amended complaint makes reference for the first time to additional delegate committees. Had the potential respondent committees been notified of the initial complaint, this would clearly constitute an amendment by virtue of its naming of additional respondents. Thus, the amendment raises new issues of coordination with different delegate committees. Second, the amendment raises a new allegation concerning what is alleged to be a reprint of Committee material by a delegate committee. This allegation was not made in the initial complaint. Third, the extensive recitation of additional alleged facts requires substantial additional effort to prepare the Committee's response. Several different committee employees must be located and statements must be obtained from them. Many of these additional individuals are presently located out of town. The assumption that we can possibly contact them and obtain statements from them when we received this amended complaint after 5:30 p.m. on the Wednesday before a holiday weekend is totally unwarranted. Thus, it is impossible for us to respond to these new allegations without the additional time to which we are entitled.

We note that the two additional newspaper articles submitted with the amendment are dated April 11 and April 14, yet the Hart campaign did not file its amendment until April 18. Counsel for the Hart campaign are well aware of the Commission's enforcement procedures. The Commission should not allow itself to be a party to an obvious attempt to prevent the Committee from exercising its statutory right to demonstrate that no action should be taken. The inflammatory language both of the initial complaint and the amendment is obviously intended to deprive the Committee of fair and impartial consideration of this

Paid for by Mondale for President, Inc.

3 5 0 4 0 5 0 0 1 1

matter by the Commission. It will be impossible for the Commission to give such consideration to this matter if the Committee does not have full opportunity and means to respond to Americans with Hart's outrageous charges.

We request that you immediately reconsider your conclusion that this submission does not constitute an amendment and notify the Committee accordingly. With regard to notifications, the attached letter was submitted to you over a month ago requesting that notifications be sent to us as General Counsel, and Deputy General Counsel. We have not received any response to this request, yet the notification of these complaints was addressed to Michael S. Berman, Treasurer.

Thank you for your prompt attention to this matter.

Sincerely,

David M. Ifshin
General Counsel

Carolyn U. Oliphant

Carolyn U. Oliphant
Deputy General Counsel

Attachment

cc: Lee Ann Elliott, Chairman
Thomas E. Harris, Vice Chairman
Joan D. Aikens
Danny Lee McDonald
John Warren McGarry
Frank P. Reiche

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1 Wisconsin Avenue, N.W.
Washington, D.C. 20007
Telephone: 202-625-1600

MONDALE

March 19, 1984

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

Dear Mr. Steele:

Attached is another form designating David M. Ifshin, General Counsel, and Carolyn U. Oliphant, Deputy General Counsel, as counsel for the Mondale for President Campaign Committee, Inc. This one was received in connection with MUR 1641. In order to ensure that we receive timely notification of all future matters, I would appreciate your acceptance of this designation of counsel for all matters as effective until revoked. Thus, counsel will receive an initial notification of any future matters filed against the Committee.

If you have any questions concerning this request, please contact Lyn Oliphant at 625-1780.

Sincerely,

Michael S. Berman
Treasurer

Paid for by Mondale for President, Inc.

STATEMENT OF DESIGNATION OF COUNSEL

NAME OF COUNSEL:

David M. Ifshin, Carolyn U. Oliphant

ADDRESS:

Mondale for President Committee, Inc.
2201 Wisconsin Avenue
Suite 100
Washington, D.C. 20007

TELEPHONE:

(202) 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.

3-14-84
Date

Michael S. Berman
Signature

NAME: Michael S. Berman

ADDRESS: Mondale for President Committee, Inc.
2201 Wisconsin Avenue
Washington, D.C. 20007

HOME PHONE: 342-9553

BUSINESS PHONE: 452-8387

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 20, 1984

MEMORANDUM

TO: Charles N. Steele
General Counsel

FROM: Kenneth A. Gross
Associate General Counsel

SUBJECT: Designation of Counsel for Mondale Committee

Attached to the April 19, 1984 letter from the Mondale Committee, I noticed the March 19, 1984 letter from Mike Berman designating Ifshin/Oliphant as counsel. Unfortunately, that designation which was submitted in the context of MUR 1641 was not brought to my attention. However, in this instance, counsel was called upon receipt by the Commission and arrangements were made for hand delivery, thus there was no delay in transmittal.

We have no objection to directing correspondence to in-house counsel when designated by the treasurer in this fashion. Thus, I have asked docket to double-check all correspondence to Mondale and have advised the team leaders of this designation request. I do not believe a specific response is needed as long as we begin to direct correspondence to either Ifshin or Oliphant.

I would note that we had some difficulty in the past with the treasurer of the LaRouche Committee designating Jim Schoener as counsel on all MURs. We agreed to do it on all open matters, but since he was not in-house counsel we did not automatically assume that he would handle all cases. Here, we are dealing with in-house counsel, which generally does not require a designation of counsel in order to deal with them. Thus, the present request by the Mondale treasurer is more in the nature of where and to whom to direct correspondence than a designation of counsel.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 19, 1984

MEMORANDUM

TO: Gary Johansen
Thomas J. Whitehead
Lois Lerner
Dan Blessington
Cheryl Thomas

FROM: Kenneth A. Gross
Associate General Counsel

SUBJECT: Designation of Counsel for
Mondale for President Campaign
Committee, Inc.

As the attached designations indicate, please direct all correspondence to David M. Ifshin and/or Carolyn O. Oliphant instead of directing correspondence to the treasurer, Michael S. Berman, Mondale for President.

cc: Charles N. Steele
Lawrence M. Noble

8504050015

Washington, D.C. 20007
Telephone: 202-625-1600

MONDALE

March 19, 1984

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

Dear Mr. Steele:

Attached is another form designating David M. Ifshin, General Counsel, and Carolyn U. Oliphant, Deputy General Counsel, as counsel for the Mondale for President Campaign Committee, Inc. This one was received in connection with MUR 1641. In order to ensure that we receive timely notification of all future matters, I would appreciate your acceptance of this designation of counsel for all matters as effective until revoked. Thus, counsel will receive an initial notification of any future matters filed against the Committee.

If you have any questions concerning this request, please contact Lyn Oliphant at 625-1780.

Sincerely,

Mike Berman

Michael S. Berman
Treasurer

Paid for by Mondale for President, Inc.

NAME OF COUNSEL:

David M. Ifshin, Carolyn U. Oliphant

ADDRESS:

Mondale for President Committee, Inc.
2201 Wisconsin Avenue
Suite 100
Washington, D.C. 20007

TELEPHONE:

(202) 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.

3-14-84
Date

Michael S. Berman
Signature

NAME: Michael S. Berman

ADDRESS: Mondale for President Committee, Inc.
2201 Wisconsin Avenue
Washington, D.C. 20007

HOME PHONE:
342-9553

BUSINESS PHONE:
452-8387

8504050018

Mondale for President
2301 Wisconsin Avenue, N.W.
Washington, D.C. 20007
Telephone: 202-625-1600

MONDALE

KAG

April 19, 1984

HAND DELIVERED

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

RE: MUR 1667

Dear Mr. Steele:

This letter is to notify you that the Mondale for President Committee, Inc. (the "Committee") strongly disagrees with your conclusion that the additional 10-page brief and accompanying exhibits from the complainant in the above-referenced matter does not constitute an amendment to the complaint. The Committee is therefore entitled to 15 days from receipt to respond to these new allegations. This right to an opportunity to respond to an amended complaint is independent of our request for a 15-day extension of time which is routinely granted by the Office of General Counsel.

First, the amended complaint makes reference for the first time to additional delegate committees. Had the potential respondent committees been notified of the initial complaint, this would clearly constitute an amendment by virtue of its naming of additional respondents. Thus, the amendment raises new issues of coordination with different delegate committees. Second, the amendment raises a new allegation concerning what is alleged to be a reprint of Committee material by a delegate committee. This allegation was not made in the initial complaint. Third, the extensive recitation of additional alleged facts requires substantial additional effort to prepare the Committee's response. Several different committee employees must be located and statements must be obtained from them. Many of these additional individuals are presently located out of town. The assumption that we can possibly contact them and obtain statements from them when we received this amended complaint after 5:30 p.m. on the Wednesday before a holiday weekend is totally unwarranted. Thus, it is impossible for us to respond to these new allegations without the additional time to which we are entitled.

We note that the two additional newspaper articles submitted with the amendment are dated April 11 and April 14, yet the Hart campaign did not file its amendment until April 18. Counsel for the Hart campaign are well aware of the Commission's enforcement procedures. The Commission should not allow itself to be a party to an obvious attempt to prevent the Committee from exercising its statutory right to demonstrate that no action should be taken. The inflammatory language both of the initial complaint and the amendment is obviously intended to deprive the Committee of fair and impartial consideration of this

Paid for by Mondale for President, Inc.

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er by the Commission. It will be impossible for the Commission to give consideration to this matter if the Committee does not have full opportunity means to respond to Americans with Hart's outrageous charges.

We request that you immediately reconsider your conclusion that this mission does not constitute an amendment and notify the Committee accordingly. regard to notifications, the attached letter was submitted to you over nth ago requesting that notifications be sent to us as General Counsel, Deputy General Counsel. We have not received any response to this request, the notification of these complaints was addressed to Michael S. Berman, surer.

Thank you for your prompt attention to this matter.

Sincerely,

David M. Ifshin
General Counsel

Carolyn U. Oliphant

Carolyn U. Oliphant
Deputy General Counsel

achment

Lee Ann Elliott, Chairman
Thomas E. Harris, Vice Chairman
Joan D. Aikens
Danny Lee McDonald
John Warren McGarry
Frank P. Reiche

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 19, 1984

MEMORANDUM

TO: Gary Johansen
Thomas J. Whitehead
Lois Lerner
Dan Blessington
Cheryl Thomas

FROM: Kenneth A. Gross
Associate General Counsel

SUBJECT: Designation of Counsel for
Mondale for President Campaign
Committee, Inc.

As the attached designations indicate, please direct all correspondence to David M. Ifshin and/or Carolyn O. Oliphant instead of directing correspondence to the treasurer, Michael S. Berman, Mondale for President.

cc: Charles N. Steele
Lawrence M. Noble

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Sincerely,

David M. Ifshin
General Counsel

Carolyn U. Oliphant

Carolyn U. Oliphant
Deputy General Counsel

Attachment

cc: Lee Ann Elliott, Chairman
Thomas E. Harris, Vice Chairman
Joan D. Aikens
Danny Lee McDonald
John Warren McGarry
Frank P. Reiche

8504050021

Mondale for President
2201 Wisconsin Avenue, N.W.
Washington, D.C. 20007
Telephone: 202-625-1980

MONDALE

KAG

April 19, 1984

HAND DELIVERED

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

RE: MUR 1667

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Paid for by Mondale for President, Inc.

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Sincerely,

David M. Ifshin
General Counsel

Carolyn U. Oliphant
Deputy General Counsel

Attachment

cc: Lee Ann Elliott, Chairman
Thomas E. Harris, Vice Chairman
Joan D. Aikens
Danny Lee McDonald
John Warren McGarry
Frank P. Reiche

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David M. Ifshin
General Counsel

Carolyn U. Oliphant

Carolyn U. Oliphant
Deputy General Counsel

Attachment

cc: Lee Ann Elliott, Chairman
Thomas E. Harris, Vice Chairman
Joan D. Aikens
Danny Lee McDonald
John Warren McGarry
Frank P. Reiche

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1311 Wisconsin Avenue, N.W.
Washington, D.C. 20007
Telephone: 202-625-1600

MONDALE

March 19, 1984

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

Dear Mr. Steele:

Attached is another form designating David M. Ifshin, General Counsel, and Carolyn U. Oliphant, Deputy General Counsel, as counsel for the Mondale for President Campaign Committee, Inc. This one was received in connection with MUR 1641. In order to ensure that we receive timely notification of all future matters, I would appreciate your acceptance of this designation of counsel for all matters as effective until revoked. Thus, counsel will receive an initial notification of any future matters filed against the Committee.

If you have any questions concerning this request, please contact Lyn Oliphant at 625-1780.

Sincerely,

Michael S. Berman
Treasurer

Paid for by Mondale for President, Inc.

STATEMENT OF DESIGNATION OF COUNSEL

NAME OF COUNSEL:

David M. Ifshin, Carolyn U. Oliphant

ADDRESS:

Mondale for President Committee, Inc.
2201 Wisconsin Ayenue
Suite 100
Washington, D.C. 20007

TELEPHONE:

(202) 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.

3-14-84
Date

Michael S. Berman
Signature

NAME: Michael S. Berman

ADDRESS: Mondale for President Committee, Inc.
2201 Wisconsin Avenue
Washington, D.C. 20007

HOME PHONE:
342-9553

BUSINESS PHONE:
452-8387

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FERC/O.G.C. Enforcement Section - Routing Slip

TRACK 1 TRACK 2 TRACK 3

MUR # 1667 Type of Report Letters

Staff MIMS (Date and Initial all comments)

To ___ On ___ From ___ for typing

To ___ On ___ From ___ for approval of draft by author

To DTB On 4/12 From SM for approval of draft by team leader or case supervisor

To ___ On ___ From ___ for reworking

To ___ On ___ From ___ for retyping

To ___ On ___ From ___ for approval of draft by author

To ___ On ___ From ___ for approval of draft by team leader or case supervisor

To ___ On 4/12 From DTB by SM for approval of draft by AGC

To ___ On ___ From ___ for reworking

To ___ On ___ From ___ for typing of final

To ___ On ___ From ___ for approval of final by author

To ___ On ___ From ___ for approval of final by team leader or case supervisor

To ___ On ___ From ___ for approval of final by AGC

To ___ On ___ From ___ for signature of report

To ___ On ___ From ___ for reworking

To ___ On ___ From ___ for Circulation by Docket

To ___ On ___ From ___ for staff initial of carbon.

To ___ On 4/12 From KAG for signature of letters

To CT On 4/12 From KAG for mailing by Docket

(✓) Sensitive ( ) Non-Sensitive

FEC/O.G.C. Enforcement Section - Routing Slip

TRACK 1 TRACK 2 TRACK 3

MUR # 1667 Type of Report 12-Day

Staff Mumau (Date and Initial all comments)

To SO On 2/10 From SM for typing

To ___ On ___ From ___ for approval of draft by author

To SO On 4/10 From SM for approval of draft by team leader or case supervisor

To ___ On ___ From ___ for reworking

To ___ On ___ From ___ for retyping

To ___ On ___ From ___ for approval of draft by author

To ___ On ___ From ___ for approval of draft by team leader or case supervisor

To ___ On ___ From ___ for approval of draft by AGC

To ___ On ___ From ___ for reworking

To ___ On ___ From ___ for typing of final

To SO On 4/12 From CL for approval of final by author

To ___ On ___ From ___ for approval of final by team leader or case supervisor

To SO On 4/14 From DB for approval of final by AGC

To ___ On ___ From ___ for signature of report

To ___ On ___ From ___ for reworking

To ___ On ___ From ___ for Circulation by Docket

To ___ On ___ From ___ for Staff initial of carbon.

To ___ On ___ From ___ for signature of letters

To ___ On ___ From ___ for mailing by Docket

( ) Sensitive ( ) Non-Sensitive

KHG

Comment Sheet

12 Day Report

MUR # 1667

Staff Member Mums

Date 4/11/94

Time of Transmittal 10:20 a.m.

Expiration of 72-hour Comment Period: 4/14/94

Comments:

approve _____

object _____ conference date/time _____

no further comment ✓ Discuss

initials KHG

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12 DAY REPORT

April 10, 1984

MUR 1667
Staff Steve Mims
Date Assigned to Staff 4/6/84

Source of MUR: Americans With Hart, Inc.

Respondent's Name: Mondale For President Committee, Inc.

Relevant Statute: 2 U.S.C. §§ 441a(a)(1)(A), 441a(b), 441a(a)(5); 26 U.S.C. § 9035

Relevant Regulations: 11 C.F.R. §§ 110.14, 110.8, 110.3 Part 109

Internal Reports Checked: None as yet

Federal Agencies Checked: None

Statement of the Case

Summary

Complainant contends that delegate committees established for the purpose of affecting the election of delegates pledged to Walter Mondale have violated the limits of 2 U.S.C. § 441a(a)(1)(A). Complainant further contends these committees are affiliated political committees by virtue of the complainant's allegation that they are participants in a plan "formulated and developed by the Mondale for President Committee and its affiliated state committees." Thus, expenditures by these committees constitute in-kind contributions to the Mondale campaign that are limited to $1,000 in the aggregate. Such activity, complainant contends, affects the expenditure ceilings to which the Mondale campaign is subject to under 11 C.F.R. § 110.8.

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The complainant argues that delegate committees under 11 C.F.R. § 110.14(e) may not avail themselves of the exemptions for individual delegate activity set forth under 11 C.F.R. § 110.14(d). Complainant further cites several newspaper accounts that quote Mondale campaign officials extolling the benefits of the delegate committees as well as their acknowledgement that advice is being given by these campaign officials to delegates across the country how to form separate fund-raising committees. This advice, it is alleged, includes Mondale's efforts to consult and provide legal assistance to the delegate committees. Accordingly, such committees should be viewed as "affiliated" committees under the Act.

It is against this factual presentation that the complainant urges the Commission to seek an injunction as to future violations (See 2 U.S.C. § 437d(e)) and to proceed expeditiously through the enforcement process as to past violations.

Legal and Factual Analysis

1. Can delegate committees use the exemptions afforded delegates?

Section 110.14(d), "Expenditures by Delegates", sets forth rules which determine whether certain expenditures by delegates will count as in-kind contributions on behalf of a presidential candidate and whether certain expenditures would count against the presidential candidate's expenditure limitations. Generally stated, expenditures by delegates for pins, bumper stickers, handbills, brochures, posters, yard signs and the like," which

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advocate the selection of the delegate and which also include information on or reference to any candidate for the office of President are not . . . contributions to the presidential candidate subject to the limitations under . . . 2 U.S.C. § 441a(a)(1) nor expenditures which count against the expenditure limitation of the presidential candidate under . . . 2 U.S.C. § 441a(b), provided that:

(A) Such materials are used in connection with volunteer activities; and

(B) Such expenditures are not for costs incurred in the use of broadcasting, newspapers, magazines, direct mail or similar types of general public communication or political advertising." [emphasis added] 11 C.F.R. § 110.14(d)(2)(i). Expenditures by delegates under (B) may be viewed as in-kind contributions to the presidential candidate chargeable against the presidential candidate's expenditure limitations (11 C.F.R. § 110.14(d)(2)(ii)(A)(1)); or, independent expenditures (11 C.F.R. § 110.14(d)(2)(ii)(B))."

On the other hand, section 110.14(e), "Delegate Committees" appear to be subject to somewhat stricter standards than delegates not acting as a political committee. Contributions to delegate committees are subject to limitation, while contributions to individual delegates are not (except that in the case of an individual contributor, the amount may not exceed $25,000 (11 C.F.R. § 110.14(c)). Likewise, contributions made by delegate committees are subject to limitations (recall the discussion above in which the Regulations set forth certain

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exemptions from the definition of "contributions" or "expenditures" by delegates).

Complainant contends that because the Regulations set out the rules for delegate committees separate from those pertaining to delegates, the Commission did not intend for the delegate committees to be afforded the same exemptions. Rather, the complainant points to the Commission's Explanation and Justification for the Regulations which states:

> If several persons acting as a group receive contributions or make expenditures in an aggregate amount exceeding $1,000 in a calendar year for the purpose of influencing the selection of any delegate(s), the group is a political committee as defined by 2 U.S.C. § 431(4). A delegate committee would be treated as any other political committee is treated under the Act. [emphasis added] 45 Fed. Reg. 102, May 23, 1980.

Thus, a cursory reading the Regulations and Explanation and Justification may lead one to conclude, as has complainant, that the provision would not include activity by delegate committees. Moreover, the plain language clearly suggests that such committees would be subject to the broad restrictions of 2 U.S.C. § 441a(a)(7). A continuing exploration of the Commission's actions in considering the regulation in the delegate areas may well shed some light on the extent to which the Commission meant to treat delegates and delegate committees separately.

In the event that we conclude that delegate committees should be afforded the "coattail" exemptions provided delegates, the Commission should permit a delegate committee the same

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exemptions afforded individual delegates. To do otherwise would seem to run counter to the underlying philosophy of HR 5010 on this point. At the same time, however, such an interpretation may appear to be at odds with the language of both the statute[1] and the Regulations.[2] Indeed, the "coattails" provision, in the Act's definition section, by its very wording, is limited to payments by a candidate or his/her authorized committees; and it may certainly be argued that this reference to authorized committees is not so inclusive as to embrace delegate committees.

2. Assuming delegate committees are able to claim the "coattail" exemptions, do the handbills included in the complaint satisfy the requirements for the exemption? (See Exhibit D)

The Regulations at § 110.14(d)(2)(i) exempt certain expenditures that advocate the selection of a delegate "and which also include information on or reference to any candidate for the office of President. . . " Exhibit D's message contained in the handbill is aimed almost entirely towards the election of Walter Mondale with only one line mentioning the candidacy of unnamed at-large delegates. It appears that the purpose behind the "coattail" provision was not to preclude a candidate for public

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1/ The Act exempts from the definition of "contribution" "the payment by a candidate, for nomination of election to any public office . . . or authorized committee of a candidate of the costs of campaign materials which include information on or reference to any other candidate and which are used in connection with volunteer activities..." [emphasis added] 2 U.S.C. § 431(8)(B)(xi).

2/ 11 C.F.R. § 100.7(b)(16).

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office from mentioning a candidate for federal office in any of the former's campaign literature. Prior to the amendments, such expenditures would have resulted in an in-kind contribution, the amount to be determined by apportioning the cost of the campaign literature or advertising. The "coattail provision" was designed to avoid this harsh result by exempting certain volunteer activity. In so doing, the Committee On House Administration noted that it was eliminating the "primary purpose test". Rather, the Committee went on to note that "[i]f a candidate makes an expenditure from his or her campaign account, the possibility that it is not for the purpose of furthering his or her election is remote at best." Report of the Committee On House Administration at 10, Sept. 7, 1979. Thus, it is appears that the underlying congressional intent contemplated a more direct approach in the communication favoring the election of the candidate who paid for the communication. Thus, even if one were to take the position that delegate committees should be treated the same as delegates with respect to how their funds are spent, factual issues exist regarding whether the specific expenditures are within the exemptions.

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3. <u>Are the delegate committees "affiliated" under the Act?</u>

Assuming that the affiliation rules apply to delegate committees, factual questions arise regarding application of these rules to these committees. At what point do the committees, in organizing and meeting with the presidential candidate and his/her agents, cross the line and become "affiliated?" (The

analysis should note that most states require that delegates and slates of delegates obtain the authorization of the candidate. Thus, the delegate selection process itself requires at the outset some minimal contact with the presidential campaign.) To say that there should not be such a test applied to delegate committees and at the same time to also say that delegate committees should be afforded the "coattails" exemptions, creates the distinct possibility that these committees may be used by the presidential candidate to accept otherwise excessive contributions and make expenditures designed to avoid the candidate's expenditure limitations. Too narrow a rule may, on the other hand, make it virtually impossible for delegate committees to function for the very specific purpose for which they were ostensibly created --to elect delegates who support a presidential candidate. Thus, an investigation into these allegations should be tempered so as to recognize these inherent conflicts but should use, at the beginning, the normal criteria for determining whether the committees are affiliated under 2 U.S.C. § 441a(a)(5). Upon completion of the investigation, the decision may be made regarding a recommendation whether the specific facts would be suppportive of a finding that these committees are affiliated. To do otherwise at this stage without the benefit of the facts surrounding the relationship of the delegate committees to each other and their relationship to the presidential campaign would be premature.

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4. Should the Commission grant the complainant's request for extraordinary relief?

Due to the fact that there is no simple, direct answer to either the law or the facts in this matter, any effort at this stage to seek injunctive relief would be inappropriate. Rather, this matter should be designated as a TRACK III MUR and processed on an expedited basis. Given the increasing level of interest among the political community, press, and public, however, we may want to issue a brief explanation of how the delegate regulations operate without reference to Mr. Mondale's situation, i.e. apart from the MUR process itself.

Statement of Preliminary Discovery Plan

This matter raises critical issues best answered by personnel of the Mondale campaign and delegate committees. Depositions should be conducted of relevant Mondale campaign personnel and individuals of record (as identified from FEC statements of organization) that are associated with several delegate committees, since too much time would be lost in conducting interrogatories; the Mondale committee should be required at the RTB stage to produce documentary evidence relevant to the issues regarding formation of the delegate committees.

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KHS
LGL

Comment Sheet

12 Day Report

MUR # 1667

Staff Member Thomas

Date 4/11/84

Time of Transmittal 10:20 A.M.

Expiration of 72-hour Comment Period: 4/16/84

Comments:

approve ✓

object _____

no comment _____

initials YT

conference date/time _____

8504030037

12 DAY REPORT

April 10, 1984

MUR 1667
Staff Steve Mims
Date Assigned to Staff 4/6/84

Source of MUR: Americans With Hart, Inc.

Respondent's Name: Mondale For President Committee, Inc.

Relevant Statute: 2 U.S.C. §§ 441a(a)(1)(A), 441a(b), 441a(a)(5); 26 U.S.C. § 9035

Relevant Regulations: 11 C.F.R. §§ 110.14, 110.8, 110.3 Part 109

Internal Reports Checked: None as yet

Federal Agencies Checked: None

Statement of the Case

Summary

Complainant contends that delegate committees established for the purpose of affecting the election of delegates pledged to Walter Mondale have violated the limits of 2 U.S.C. § 441a(a)(1)(A). Complainant further contends these committees are affiliated political committees by virtue of the complainant's allegation that they are participants in a plan "formulated and developed by the Mondale for President Committee and its affiliated state committees." Thus, expenditures by these committees constitute in-kind contributions to the Mondale campaign that are limited to $1,000 in the aggregate. Such activity, complainant contends, affects the expenditure ceilings to which the Mondale campaign is subject to under 11 C.F.R. § 110.8.

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The complainant argues that delegate committees under 11 C.F.R. § 110.14(e) may not avail themselves of the exemptions for individual delegate activity set forth under 11 C.F.R. § 110.14(d). Complainant further cites several newspaper accounts that quote Mondale campaign officials extolling the benefits of the delegate committees as well as their acknowledgement that advice is being given by these campaign officials to delegates across the country how to form separate fund-raising committees. This advice, it is alleged, includes Mondale's efforts to consult and provide legal assistance to the delegate committees. Accordingly, such committees should be viewed as "affiliated" committees under the Act.

It is against this factual presentation that the complainant urges the Commission to seek an injunction as to future violations (See 2 U.S.C. § 437d(e)) and to proceed expeditiously through the enforcement process as to past violations.

Legal and Factual Analysis

1. Can delegate committees use the exemptions afforded delegates?

Section 110.14(d), "Expenditures by Delegates", sets forth rules which determine whether certain expenditures by delegates will count as in-kind contributions on behalf of a presidential candidate and whether certain expenditures would count against the presidential candidate's expenditure limitations. Generally stated, expenditures by delegates for pins, bumper stickers, handbills, brochures, posters, yard signs and the like," which

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advocate the selection of the delegate and which also include information on or reference to any candidate for the office of President are not . . . contributions to the presidential candidate subject to the limitations under . . . 2 U.S.C. § 441a(a)(1) nor expenditures which count against the expenditure limitation of the presidential candidate under . . . 2 U.S.C. § 441a(b), provided that:

(A) Such materials are used in connection with volunteer activities; and

(B) Such expenditures are not for costs incurred in the use of broadcasting, newspapers, magazines, direct mail or similar types of general public communication or political advertising." [emphasis added] 11 C.F.R. § 110.14(d)(2)(i). Expenditures by delegates under (B) may be viewed as in-kind contributions to the presidential candidate chargeable against the presidential candidate's expenditure limitations (11 C.F.R. § 110.14(d)(2)(ii)(A)(1)); or, independent expenditures (11 C.F.R. § 110.14(d)(2)(ii)(B))."

On the other hand, section 110.14(e), "Delegate Committees" appear to be subject to somewhat stricter standards than delegates not acting as a political committee. Contributions to delegate committees are subject to limitation, while contributions to individual delegates are not (except that in the case of an individual contributor, the amount may not exceed $25,000 (11 C.F.R. § 110.14(c)). Likewise, contributions made by delegate committees are subject to limitations (recall the discussion above in which the Regulations set forth certain

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exemptions from the definition of "contributions" or "expenditures" by delegates).

Complainant contends that because the Regulations set out the rules for delegate committees separate from these pertaining to delegates, the Commission did not intend for the delegate committees to be afforded the same exemptions. Rather, the complainant points to the Commission's Explanation and Justification for the Regulations which states:

> If several persons acting as a group receive contributions or make expenditures in an aggregate amount exceeding $1,000 in a calendar year for the purpose of influencing the selection of any delegate(s), the group is a political committee as defined by 2 U.S.C. § 431(4). A delegate committee would be treated as any other political committee is treated under the Act. [emphasis added] 45 Fed. Reg. 102, May 23, 1980.

Thus, a cursory reading the Regulations and Explanation and Justification may lead one to conclude, as has complainant, that the provision would not include activity by delegate committees. Moreover, the plain language clearly suggests that such committees would be subject to the broad restrictions of 2 U.S.C. § 441a(a)(7). A continuing exploration of the Commission's actions in considering the regulation in the delegate areas may well shed some light on the extent to which the Commission meant to treat delegates and delegate committees separately.

In the event that we conclude that delegate committees should be afforded the "coattail" exemptions provided delegates, the Commission should permit a delegate committee the same

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exemptions afforded individual delegates. To do otherwise would seem to run counter-to the underlying philosophy of HR 5010 on this point. At the same time, however, such an interpretation may appear to be at odds with the language of both the statute1/ and the Regulations.2/ Indeed, the "coattails" provision, in the Act's definition section, by its very wording, is limited to payments by a candidate or his/her authorized committees; and it may certainly be argued that this reference to authorized committees is not so inclusive as to embrace delegate committees.

2. Assuming delegate committees are able to claim the "coat-tail" exemptions, do the handbills included in the complaint satisfy the requirements for the exemption? (See Exhibit D)

The Regulations at § 110.14(d)(2)(i) exempt certain expenditures that advocate the selection of a delegate "and which also include information on or reference to any candidate for the office of President. . . " Exhibit D's message contained in the handbill is aimed almost entirely towards the election of Walter Mondale with only one line mentioning the candidacy of unnamed at-large delegates. It appears that the purpose behind the "coattail" provision was not to preclude a candidate for public

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2/ 11 C.F.R. § 100.7(b)(16).

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office from mentioning a candidate for federal office in any of the former's campaign literature. Prior to the amendments, such expenditures would have resulted in an in-kind contribution, the amount to be determined by apportioning the cost of the campaign literature or advertising. The "coattail provision" was designed to avoid this harsh result by exempting certain volunteer activity. In so doing, the Committee On House Administration noted that it was eliminating the "primary purpose test". Rather, the Committee went on to note that "[i]f a candidate makes an expenditure from his or her campaign account, the possibility that it is not for the purpose of furthering his or her election is remote at best." Report of the Committee On House Administration at 10, Sept. 7, 1979. Thus, it is appears that the underlying congressional intent contemplated a more direct approach in the communication favoring the election of the candidate who paid for the communication. Thus, even if one were to take the position that delegate committees should be treated the same as delegates with respect to how their funds are spent, factual issues exist regarding whether the specific expenditures are within the exemptions.

3. Are the delegate committees "affiliated" under the Act?

Assuming that the affiliation rules apply to delegate committees, factual questions arise regarding application of these rules to these committees. At what point do the committees, in organizing and meeting with the presidential candidate and his/her agents, cross the line and become "affiliated?" (The

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analysis should note that most states require that delegates and slates of delegates obtain the authorization of the candidate. Thus, the delegate selection process itself requires at the outset some minimal contact with the presidential campaign.) To say that there should not be such a test applied to delegate committees and at the same time to also say that delegate committees should be afforded the "coattails" exemptions, creates the distinct possibility that these committees may be used by the presidential candidate to accept otherwise excessive contributions and make expenditures designed to avoid the candidate's expenditure limitations. Too narrow a rule may, on the other hand, make it virtually impossible for delegate committees to function for the very specific purpose for which they were ostensibly created --to elect delegates who support a presidential candidate. Thus, an investigation into these allegations should be tempered so as to recognize these inherent conflicts but should use, at the beginning, the normal criteria for determining whether the committees are affiliated under 2 U.S.C. § 441a(a)(5). Upon completion of the investigation, the decision may be made regarding a recommendation whether the specific facts would be suppportive of a finding that these committees are affiliated. To do otherwise at this stage without the benefit of the facts surrounding the relationship of the delegate committees to each other and their relationship to the presidential campaign would be premature.

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4. Should the Commission grant the complainant's request for extraordinary relief?

Due to the fact that there is no simple, direct answer to either the law or the facts in this matter, any effort at this stage to seek injunctive relief would be inappropriate. Rather, this matter should be designated as a TRACK III MUR and processed on an expedited basis. Given the increasing level of interest among the political community, press, and public, however, we may want to issue a brief explanation of how the delegate regulations operate without reference to Mr. Mondale's situation, i.e. apart from the MUR process itself.

Statement of Preliminary Discovery Plan

This matter raises critical issues best answered by personnel of the Mondale campaign and delegate committees. Depositions should be conducted of relevant Mondale campaign personnel and individuals of record (as identified from FEC statements of organization) that are associated with several delegate committees, since too much time would be lost in conducting interrogatories; the Mondale committee should be required at the RTB stage to produce documentary evidence relevant to the issues regarding formation of the delegate committees.

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TJW

Comment Sheet

12 Day Report

MUR # 1667

Staff Member [redacted]

Date 4/16/91

Time of Transmittal 10:20 am

Expiration of 72-hour Comment Period: 4/16/91

Comments:

approve ✓

object _____

no comment _____

initials TJW

conference date/time _____

8504005300045

12 DAY REPORT

April 10, 1984

MUR 1667
Staff Steve Mims
Date Assigned to Staff 4/6/84

Source of MUR: Americans With Hart, Inc.

Respondent's Name: Mondale For President Committee, Inc.

Relevant Statute: 2 U.S.C. §§ 441a(a)(1)(A), 441a(b), 441a(a)(5); 26 U.S.C. § 9035

Relevant Regulations: 11 C.F.R. §§ 110.14, 110.8, 110.3 Part 109

Internal Reports Checked: None as yet

Federal Agencies Checked: None

Statement of the Case

Summary

Complainant contends that delegate committees established for the purpose of affecting the election of delegates pledged to Walter Mondale have violated the limits of 2 U.S.C. § 441a(a)(1)(A). Complainant further contends these committees are affiliated political committees by virtue of the complainant's allegation that they are participants in a plan "formulated and developed by the Mondale for President Committee and its affiliated state committees." Thus, expenditures by these committees constitute in-kind contributions to the Mondale campaign that are limited to $1,000 in the aggregate. Such activity, complainant contends, affects the expenditure ceilings to which the Mondale campaign is subject to under 11 C.F.R. § 110.8.

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The complainant argues that delegate committees under 11 C.F.R. § 110.14(e) may not avail themselves of the exemptions for individual delegate activity set forth under 11 C.F.R. § 110.14(d). Complainant further cites several newspaper accounts that quote Mondale campaign officials extolling the benefits of the delegate committees as well as their acknowledgement that advice is being given by these campaign officials to delegates across the country how to form separate fund-raising committees. This advice, it is alleged, includes Mondale's efforts to consult and provide legal assistance to the delegate committees. Accordingly, such committees should be viewed as "affiliated" committees under the Act.

It is against this factual presentation that the complainant urges the Commission to seek an injunction as to future violations (See 2 U.S.C. § 437d(e)) and to proceed expeditiously through the enforcement process as to past violations.

Legal and Factual Analysis

1. Can delegate committees use the exemptions afforded delegates?

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advocate the selection of the delegate and which also include information on or reference to any candidate for the office of President are not . . . contributions to the presidential candidate subject to the limitations under . . . 2 U.S.C. § 441a(a)(1) nor expenditures which count against the expenditure limitation of the presidential candidate under . . . 2 U.S.C. § 441a(b), provided that:

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In the event that we conclude that delegate committees should be afforded the "coattail" exemptions provided delegates, the Commission should permit a delegate committee the same

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2/ 11 C.F.R. § 100.7(b)(16).

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GJ.

Comment Sheet

12 Day Report

MUR # 1667

Staff Member Norma

Date 4/11/95

Time of Transmittal 10:20 am

Expiration of 72-hour Comment Period: 4/14/95

Comments:

I believe the affiliation issue needs to be explored.

approve ✓

object _____

no comment _____

initials G.L.J

conference date/time _____

8504030005

12 DAY REPORT

April 10, 1984

MUR 1667
Staff Steve Mims
Date Assigned to Staff 4/6/84

Source of MUR: Americans With Hart, Inc.

Respondent's Name: Mondale For President Committee, Inc.

Relevant Statute: 2 U.S.C. §§ 441a(a)(1)(A), 441a(b), 441a(a)(5); 26 U.S.C. § 9035

Relevant Regulations: 11 C.F.R. §§ 110.14, 110.8, 110.3 Part 109

Internal Reports Checked: None as yet

Federal Agencies Checked: None

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Complainant contends that delegate committees established for the purpose of affecting the election of delegates pledged to Walter Mondale have violated the limits of 2 U.S.C. § 441a(a)(1)(A). Complainant further contends these committees are affiliated political committees by virtue of the complainant's allegation that they are participants in a plan "formulated and developed by the Mondale for President Committee and its affiliated state committees." Thus, expenditures by these committees constitute in-kind contributions to the Mondale campaign that are limited to $1,000 in the aggregate. Such activity, complainant contends, affects the expenditure ceilings to which the Mondale campaign is subject to under 11 C.F.R. § 110.8.

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The complainant argues that delegate committees under 11 C.F.R. § 110.14(e) may not avail themselves of the exemptions for individual delegate activity set forth under 11 C.F.R. § 110.14(d). Complainant further cites several newspaper accounts that quote Mondale campaign officials extolling the benefits of the delegate committees as well as their acknowledgement that advice is being given by these campaign officials to delegates across the country how to form separate fund-raising committees. This advice, it is alleged, includes Mondale's efforts to consult and provide legal assistance to the delegate committees. Accordingly, such committees should be viewed as "affiliated" committees under the Act.

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The Regulations at § 110.14(d)(2)(i) exempt certain expenditures that advocate the selection of a delegate "and which also include information on or reference to any candidate for the office of President. . . " Exhibit D's message contained in the handbill is aimed almost entirely towards the election of Walter Mondale with only one line mentioning the candidacy of unnamed at-large delegates. It appears that the purpose behind the "coattail" provision was not to preclude a candidate for public

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1/ The Act exempts from the definition of "contribution" "the payment by a candidate, for nomination of election to any public office . . . or authorized committee of a candidate of the costs of campaign materials which include information on or reference to any other candidate and which are used in connection with volunteer activities..." [emphasis added] 2 U.S.C. § 431(8)(B)(xi).

2/ 11 C.F.R. § 100.7(b)(16).

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office from mentioning a candidate for federal office in any of the former's campaign literature. Prior to the amendments, such expenditures would have resulted in an in-kind contribution, the amount to be determined by apportioning the cost of the campaign literature or advertising. The "coattail provision" was designed to avoid this harsh result by exempting certain volunteer activity. In so doing, the Committee On House Administration noted that it was eliminating the "primary purpose test". Rather, the Committee went on to note that "[i]f a candidate makes an expenditure from his or her campaign account, the possibility that it is not for the purpose of furthering his or her election is remote at best." Report of the Committee On House Administration at 10, Sept. 7, 1979. Thus, it is appears that the underlying congressional intent contemplated a more direct approach in the communication favoring the election of the candidate who paid for the communication. Thus, even if one were to take the position that delegate committees should be treated the same as delegates with respect to how their funds are spent, factual issues exist regarding whether the specific expenditures are within the exemptions.

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3. Are the delegate committees "affiliated" under the Act?

Assuming that the affiliation rules apply to delegate committees, factual questions arise regarding application of these rules to these committees. At what point do the committees, in organizing and meeting with the presidential candidate and his/her agents, cross the line and become "affiliated?" (The

analysis should note that most states require that delegates and slates of delegates obtain the authorization of the candidate. Thus, the delegate selection process itself requires at the outset some minimal contact with the presidential campaign.) To say that there should not be such a test applied to delegate committees and at the same time to also say that delegate committees should be afforded the "coattails" exemptions, creates the distinct possibility that these committees may be used by the presidential candidate to accept otherwise excessive contributions and make expenditures designed to avoid the candidate's expenditure limitations. Too narrow a rule may, on the other hand, make it virtually impossible for delegate committees to function for the very specific purpose for which they were ostensibly created --to elect delegates who support a presidential candidate. Thus, an investigation into these allegations should be tempered so as to recognize these inherent conflicts but should use, at the beginning, the normal criteria for determining whether the committees are affiliated under 2 U.S.C. § 441a(a)(5). Upon completion of the investigation, the decision may be made regarding a recommendation whether the specific facts would be suppportive of a finding that these committees are affiliated. To do otherwise at this stage without the benefit of the facts surrounding the relationship of the delegate committees to each other and their relationship to the presidential campaign would be premature.

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4. Should the Commission grant the complainant's request for extraordinary relief?

Due to the fact that there is no simple, direct answer to either the law or the facts in this matter, any effort at this stage to seek injunctive relief would be inappropriate. Rather, this matter should be designated as a TRACK III MUR and processed on an expedited basis. Given the increasing level of interest among the political community, press, and public, however, we may want to issue a brief explanation of how the delegate regulations operate without reference to Mr. Mondale's situation, i.e. apart from the MUR process itself.

Statement of Preliminary Discovery Plan

This matter raises critical issues best answered by personnel of the Mondale campaign and delegate committees. Depositions should be conducted of relevant Mondale campaign personnel and individuals of record (as identified from FEC statements of organization) that are associated with several delegate committees, since too much time would be lost in conducting interrogatories; the Mondale committee should be required at the RTB stage to produce documentary evidence relevant to the issues regarding formation of the delegate committees.

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Docket

Comment Sheet

12 Day Report

MUR # 1667

Staff Member Thomas

Date 4/11/95

Time of Transmittal 10:20 a.m.

Expiration of 72-hour Comment Period: 4/14/95

Comments:

approve _____

object _____ conference date/time _____

no comment _____

initials _____

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12 DAY REPORT

April 10, 1984

MUR 1667
Staff Steve Mims
Date Assigned to Staff 4/6/84

Source of MUR: Americans With Hart, Inc.

Respondent's Name: Mondale For President Committee, Inc.

Relevant Statute: 2 U.S.C. §§ 441a(a)(1)(A), 441a(b), 441a(a)(5); 26 U.S.C. § 9035

Relevant Regulations: 11 C.F.R. §§ 110.14, 110.8, 110.3 Part 109

Internal Reports Checked: None as yet

Federal Agencies Checked: None

Statement of the Case

Summary

Complainant contends that delegate committees established for the purpose of affecting the election of delegates pledged to Walter Mondale have violated the limits of 2 U.S.C. § 441a(a)(1)(A). Complainant further contends these committees are affiliated political committees by virtue of the complainant's allegation that they are participants in a plan "formulated and developed by the Mondale for President Committee and its affiliated state committees." Thus, expenditures by these committees constitute in-kind contributions to the Mondale campaign that are limited to $1,000 in the aggregate. Such activity, complainant contends, affects the expenditure ceilings to which the Mondale campaign is subject to under 11 C.F.R. § 110.8.

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The complainant argues that delegate committees under 11 C.F.R. § 110.14(e) may not avail themselves of the exemptions for individual delegate activity set forth under 11 C.F.R. § 110.14(d). Complainant further cites several newspaper accounts that quote Mondale campaign officials extolling the benefits of the delegate committees as well as their acknowledgement that advice is being given by these campaign officials to delegates across the country how to form separate fund-raising committees. This advice, it is alleged, includes Mondale's efforts to consult and provide legal assistance to the delegate committees. Accordingly, such committees should be viewed as "affiliated" committees under the Act.

It is against this factual presentation that the complainant urges the Commission to seek an injunction as to future violations (See 2 U.S.C. § 437d(e)) and to proceed expeditiously through the enforcement process as to past violations.

Legal and Factual Analysis

1. Can delegate committees use the exemptions afforded delegates?

Section 110.14(d), "Expenditures by Delegates", sets forth rules which determine whether certain expenditures by delegates will count as in-kind contributions on behalf of a presidential candidate and whether certain expenditures would count against the presidential candidate's expenditure limitations. Generally stated, expenditures by delegates for pins, bumper stickers, handbills, brochures, posters, yard signs and the like," which

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advocate the selection of the delegate and which also include information on or reference to any candidate for the office of President are not . . . contributions to the presidential candidate subject to the limitations under . . . 2 U.S.C. § 441a(a)(1) nor expenditures which count against the expenditure limitation of the presidential candidate under . . . 2 U.S.C. § 441a(b), provided that:

(A) Such materials are used in connection with volunteer activities; and

(B) Such expenditures are not for costs incurred in the use of broadcasting, newspapers, magazines, direct mail or similar types of general public communication or political advertising." [emphasis added] 11 C.F.R. § 110.14(d)(2)(i). Expenditures by delegates under (B) may be viewed as in-kind contributions to the presidential candidate chargeable against the presidential candidate's expenditure limitations (11 C.F.R. § 110.14(d)(2)(ii)(A)(1)); or, independent expenditures (11 C.F.R. § 110.14(d)(2)(ii)(B))."

On the other hand, section 110.14(e), "Delegate Committees" appear to be subject to somewhat stricter standards than delegates not acting as a political committee. Contributions to delegate committees are subject to limitation, while contributions to individual delegates are not (except that in the case of an individual contributor, the amount may not exceed $25,000 (11 C.F.R. § 110.14(c)). Likewise, contributions made by delegate committees are subject to limitations (recall the discussion above in which the Regulations set forth certain

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exemptions from the definition of "contributions" or "expenditures" by delegates).

Complainant contends that because the Regulations set out the rules for delegate committees separate from these pertaining to delegates, the Commission did not intend for the delegate committees to be afforded the same exemptions. Rather, the complainant points to the Commission's Explanation and Justification for the Regulations which states:

> If several persons acting as a group receive contributions or make expenditures in an aggregate amount exceeding $1,000 in a calendar year for the purpose of influencing the selection of any delegate(s), the group is a political committee as defined by 2 U.S.C. § 431(4). A delegate committee would be treated as any other political committee is treated under the Act. [emphasis added] 45 Fed. Reg. 102, May 23, 1980.

Thus, a cursory reading the Regulations and Explanation and Justification may lead one to conclude, as has complainant, that the provision would not include activity by delegate committees. Moreover, the plain language clearly suggests that such committees would be subject to the broad restrictions of 2 U.S.C. § 441a(a)(7). A continuing exploration of the Commission's actions in considering the regulation in the delegate areas may well shed some light on the extent to which the Commission meant to treat delegates and delegate committees separately.

In the event that we conclude that delegate committees should be afforded the "coattail" exemptions provided delegates, the Commission should permit a delegate committee the same

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exemptions afforded individual delegates. To do otherwise would seem to run counter-to the underlying philosophy of HR 5010 on this point. At the same time, however, such an interpretation may appear to be at odds with the language of both the statute1/ and the Regulations.2/ Indeed, the "coattails" provision, in the Act's definition section, by its very wording, is limited to payments by a candidate or his/her authorized committees; and it may certainly be argued that this reference to authorized committees is not so inclusive as to embrace delegate committees.

2. Assuming delegate committees are able to claim the "coat-tail" exemptions, do the handbills included in the complaint satisfy the requirements for the exemption? (See Exhibit D)

The Regulations at § 110.14(d)(2)(i) exempt certain expenditures that advocate the selection of a delegate "and which also include information on or reference to any candidate for the office of President. . . " Exhibit D's message contained in the handbill is aimed almost entirely towards the election of Walter Mondale with only one line mentioning the candidacy of unnamed at-large delegates. It appears that the purpose behind the "coattail" provision was not to preclude a candidate for public

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4. Should the Commission grant the complainant's request for extraordinary relief?

Due to the fact that there is no simple, direct answer to either the law or the facts in this matter, any effort at this stage to seek injunctive relief would be inappropriate. Rather, this matter should be designated as a TRACK III MUR and processed on an expedited basis. Given the increasing level of interest among the political community, press, and public, however, we may want to issue a brief explanation of how the delegate regulations operate without reference to Mr. Mondale's situation, i.e. apart from the MUR process itself.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary

FROM: Office of General Counsel

DATE: April 9, 1984

SUBJECT: MUR 1667 - Memorandum to The Commission

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

Open Session _____

Closed Session _____

CIRCULATIONS		DISTRIBUTION	
48 Hour Tally Vote	[ ]	Compliance	[X]
Sensitive	[ ]		
Non-Sensitive	[ ]	Audit Matters	[ ]
24 Hour No Objection	[ ]	Litigation	[ ]
Sensitive	[ ]		
Non-Sensitive	[ ]	Closed MUR Letters	[ ]
Information	[ ]	Status Sheets	[ ]
Sensitive	[ ]		
Non-Sensitive	[ ]	Advisory Opinions	[ ]
		Other (see distribution below)	[ ]
Other	[X]		

CIRCULATE ON PINK PAPER

INFORMATION - SENSITIVE

8504050074

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 9, 1984

MEMORANDUM

TO: The Commission

FROM: Charles N. Steele
General Counsel

SUBJECT: MUR 1667 - Complaint of Americans With Hart, Inc. against Mondale For President Committee, Inc.

On April 6, 1984, Americans With Hart, Inc. filed a complaint against the Mondale for President Committee, Inc. alleging violations of the Federal Election Campaign Act of 1971, as amended and the Commission regulations involving the activities of delegates and delegate committees. Respondents were notified of the complaint that same day. In part, the complaint requests expedited action involving an immediate determination by the Commission concerning these activities and that the Commission authorize the General Counsel to seek immediate injunctive and declaratory relief in court without waiting for responses from the respondents.

The Office of General Counsel has preliminarily reviewed this matter and does not believe that the circumstances of this case warrant such extraordinary action be taken and that the Mondale Committee be allowed the opportunity to respond provided for under the statute.

8504050075

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1667
Mondale for President Committee, Inc.)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on April 24, 1984, do hereby certify that the Commission took the following actions in MUR 1667:

1. Decided by a vote of 5-1 to approve that notification be sent to the following committees in connection with MUR 1667:

    1) Wisconsin At-Large Delegates Mondale Committee.
    2) Mondale Delegates — D.C. Committee.
    3) New York At-Large Delegates
    4) Delegates At-Large for Mondale (Pa.)

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

2. Failed in a vote of 2-4 to pass a motion to approve that notification be sent to the Illinois Mondale delegate committees.

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

Attest:

4-25-84
Date

Marjorie W. Emmons
Secretary of the Commission

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 26, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mondale Delegates -- DC Committee
c/o Charlene Drew Jarvis
1200 Massachusetts Avenue, N.W.
Washington, D.C. 20005

Re: MUR 1667

Dear Ms. Jarvis:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint which alleges that the committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint and a supplement received on April 18, 1984, is enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against 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 which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

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If you have any questions, please contact Stephen Mims, the staff member assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

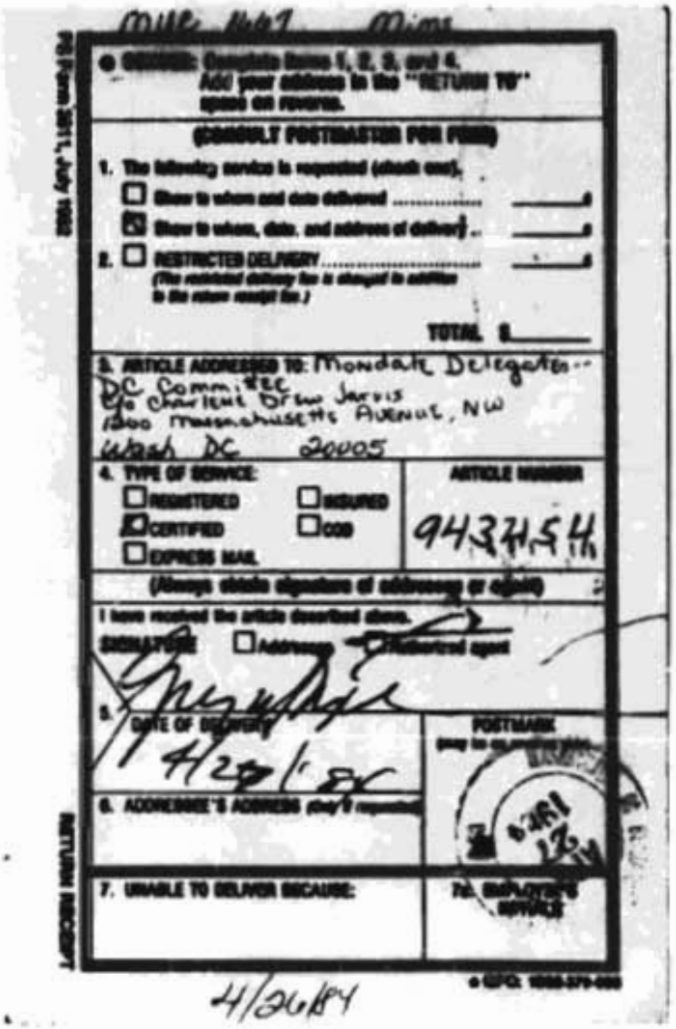
Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

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

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Mike Hall Mims

● SENDER: Complete items 1, 2, 3, and 4. Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

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: Mondale Delegate
DC Committee
c/o Charlene Drew Jarvis
1000 Massachusetts Avenue, NW
Wash DC 20005

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☑ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943754

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY 4/27/84

POSTMARK

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

8. EMPLOYEE'S INITIALS

RETURN RECEIPT

4/26/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 26, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Chester J. Straubb, Treasurer
New York At-Large Delegates
153 East 53rd Street
New York, NY 10022

Re: MUR 1667

Dear Mr. Straubb:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint which alleges that the committee and you, individually and as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint and a supplement received on April 18, 1984 is enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

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If you have any questions, please contact Stephen Mims, the staff member 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.

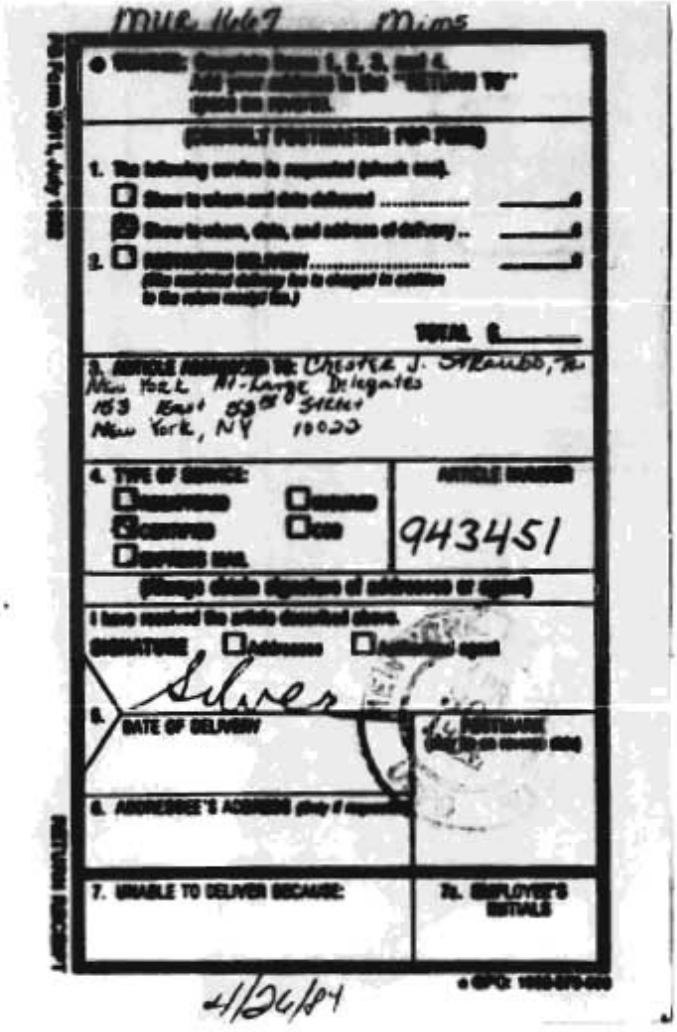
Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

3524052000987

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


MUR 1667 Mims

3. ARTICLE ADDRESSED TO: Chester J. Straub, Jr.
New York At-Large Delegates
153 East 53rd Street
New York, NY 10022

4. TYPE OF SERVICE: CERTIFIED
ARTICLE NUMBER 943451

I have received the article described above.
SIGNATURE Silver

8. DATE OF DELIVERY

7. UNABLE TO DELIVER BECAUSE:

4/26/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 26, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Rick Asplund, Treasurer
Wisconsin At-Large Delegates
Mondale Committee
126 Sunny Meade Lane, No. 6
Madison, WI 53713

Re: MUR 1667

Dear Mr. Asplund:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint which alleges that the committee and you, individually and as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint and a supplement received on April 18, 1984, is enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against the committee and you, individually and as treasurer, 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.

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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.

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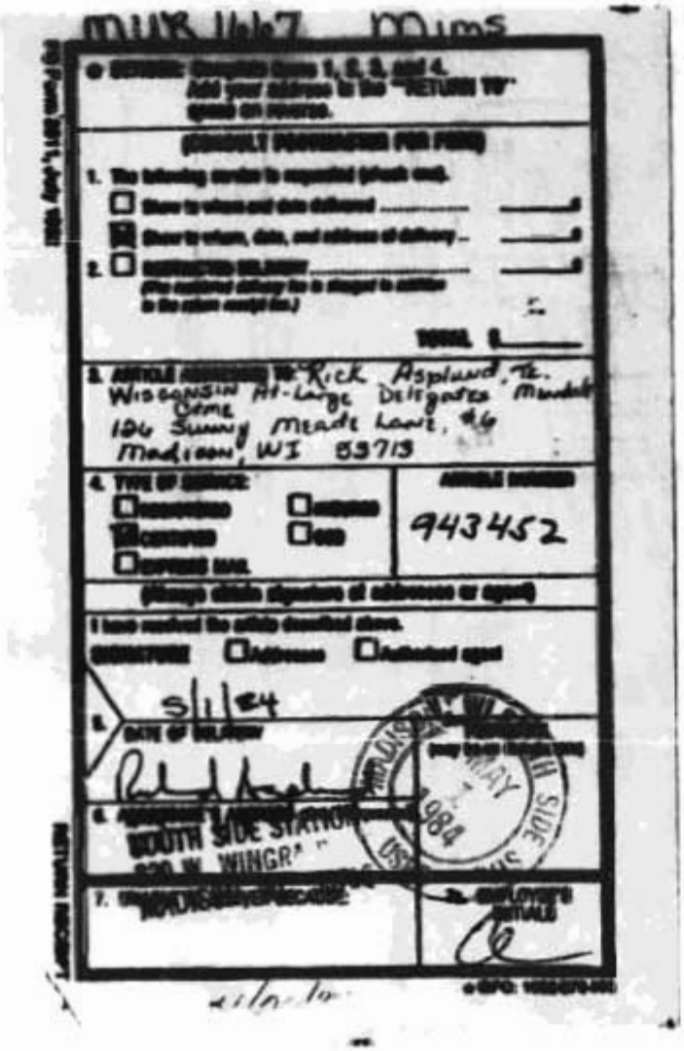
If you have any questions, please contact Stephen Mims, the staff member assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

By Kenneth A. Gross
Associate General Counsel

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



9504030093

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 26, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Joanne B. Ciulla, Treasurer
Delegates At-Large for Mondale
1418 Walnut Street
Philadelphia, PA 19103

Re: MUR 1667

Dear Ms. Ciulla:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint which alleges that the committee and you, individually and as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint and a supplement received on April 18, 1984, is enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against the committee and you, individually and as treasurer, 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.

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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.

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If you have any questions, please contact Stephen Mims, the staff member assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

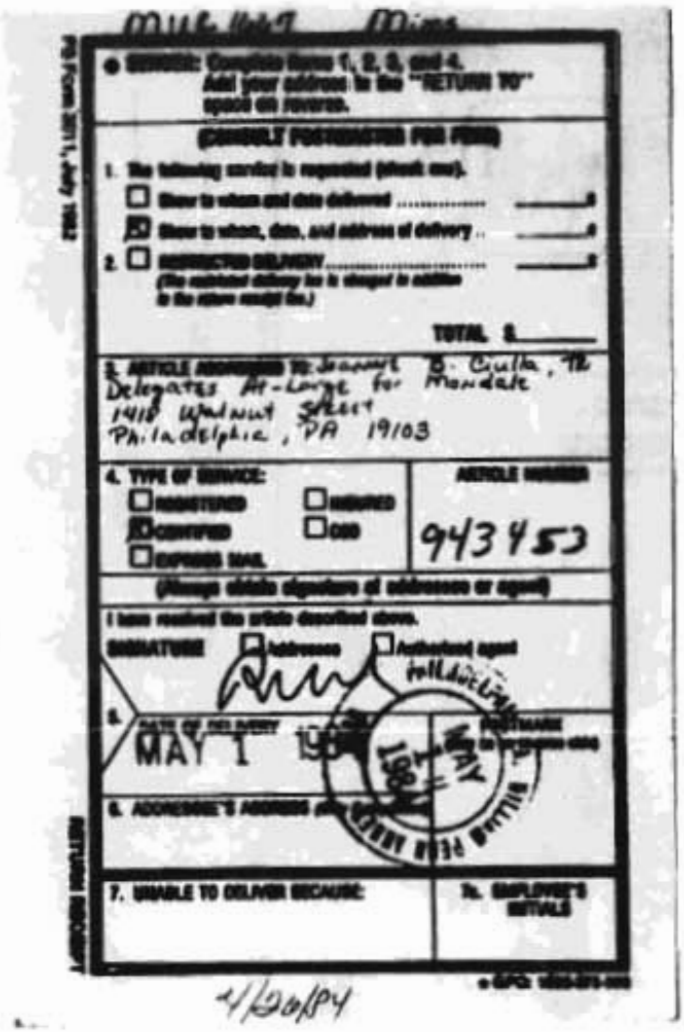
Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

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



SENSITIVE

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

84 APR 23 P4: 48

Submitted Late

April 23, 1984

EXECUTIVE SESSION
APR 24 1984

MEMORANDUM TO: The Commission

FROM: Charles N. Steele CNS/bmm
General Counsel

SUBJECT: MUR 1667

During Friday's Executive Session, the Commission discussed the General Counsel's Memorandum of April 19, 1984, regarding requests for extensions of time to respond to the complaint filed in MUR 1667. In that memorandum and again in the Executive Session, the Office of General Counsel advised the Commission that a preliminary review of the complaint and the amendment thereto raised concerns that certain entities should be noticed even though not specifically named as respondents by the complainant. The memorandum set forth the General Counsel's position that such entities should be sent copies of the complaint and its supplement and should be afforded fifteen days to respond to the complaint.

At the close of Friday's discussion, no formal vote was taken on this issue, however, this office understood that it was the sense of the Commission to proceed along the lines set forth by the General Counsel, that is, to send notices of the complaint to the first two categories of entities described above. Subsequently, Commissioner Reiche conveyed to the General Counsel that it was his belief that the Commission did not intend notices to be sent to those entities not explicitly named as respondents by the complainant.

It remains the General Counsel's view that notices must be sent in all cases where the complaint and attachments provide information indicating potential liability against specific entities, and not just in those cases where the complainant has chosen to call the involved party a respondent. Consequently, absent Commission instruction to the contrary, notification will be sent to all appropriate entities.

3540050085

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1667
Mondale for President Committee, Inc.)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on April 20, 1984, do hereby certify that the Commission decided by a vote of 4-1 to grant an extension of time, until not later than April 30, 1984, to the Mondale for President Committee to file a response to the complaint filed on April 6, 1984, in MUR 1667, and to the amended complaint filed on April 18, 1984.

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

Attest:

4-20-84
Date

Marjorie W. Emmons
Secretary of the Commission

3504050096

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 20, 1984

Ms. Carolyn U. Oliphant
Deputy General Counsel
Mondale for President Committee, Inc.
2201 Wisconsin Avenue, N.W.
Washington, DC 20007

Re: Requests for Extension in MUR 1667

Dear Ms. Oliphant:

This is in reference to your letters dated April 18, 1984, and April 19, 1984, requesting extensions of time in which to respond to the allegations contained in a complaint filed against the Mondale for President Committee, Inc., on April 6, 1984, and the supplement filed on April 18, 1984.

The Commission considered your requests on April 20, 1984, and voted to grant an extension of time in which to file a response to the complaint as filed on April 6, 1984, and as supplemented on April 18, 1984. Your response should be received not later than April 30, 1984.

If you have any further questions regarding this matter, please contact Stephen Mims, the staff member assigned to this matter at (202)523-4000.

Sincerely,

Charles N. Steele
General Counsel

3504005087

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

MEMORANDUM TO: CHARLES STEELE, GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/JODY C. RANSOM

DATE: APRIL 19, 1984

SUBJECT: OBJECTION - MUR 1667 Memorandum to the Commission dated April 19, 1984

The above-named document was circulated to the Commission on Thursday, April 19, 1984 at 4:30.

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

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

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

3504005008 3

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY
84 APR 19 P3: 47

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 19, 1984

MEMORANDUM

TO: The Commission

FROM: Charles N. Steele
General Counsel

SUBJECT: Requests for extension of time in which to file a response to the complaint in MUR 1667

Pursuant to the Commission's decision of April 12, 1984, the General Counsel's Office is forwarding, for your review, two requests received from the Mondale for President Committee, Inc., for extensions of time in which to file responses to the complaint in MUR 1667.

The first request was received by this Office on April 18, 1984, and cites as a basis for its request, the need to review transcripts of 3 Commission meetings at which the delegate regulations were discussed. The Commission Secretary has advised this Office that all of the requested transcripts should be prepared and certified not later than close of business on April 24, 1984. The Office of the General Counsel recommends, therefore, that the Mondale for President Committee, Inc., be granted an extension of not more than five calendar days beyond the date on which all of the transcripts requested by their letter of April 16, 1984, have been certified and made available to them, in which to file a response to the complaint as received on April 6, 1984.

The second request was made orally and was followed by a written request to this office by the Mondale for President Committee, Inc., on April 19, 1984. The letter requests an additional 15 days in which to file a response to the additional materials submitted by the complainant which were received on April 18, 1984. (The additional materials were also received by the Mondale for President Committee on April 18, 1984).

It has been the practice of the Office of the General Counsel to afford a respondent 15 days to respond to any amended complaint that sets forth new allegations. It is the

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view of this Office, upon a review of the additional submission by the complainant, that additional allegations are contained within this recent submission and that the Mondale for President Committee, Inc., should be afforded 15 days in which to file a response to these new materials. (The Office of the General Counsel does not believe the submission of the additional materials should have a bearing upon the time period recommended for receiving a response to the original complaint).

Finally, this Office wishes to advise the Commission that a preliminary review of the complaint and the amendment thereto, raises concerns that other entities should be considered as respondents in this matter. Although not specifically mentioned in the complaint as respondents, this Office believes that these other entities should be sent a copy of the complaint and its amendment and that they should be afforded 15 days to respond to the complaint, as amended. This Office plans to notify these other entities in the same manner as in any other MUR.

3504500090

Recommendations

The Office of the General Counsel recommends, therefore:

1) That the Commission grant the Mondale for President Commitee, Inc., an extension of time in which to file a response to the complaint as filed on April 6, 1984, of not more than 5 calendar days from the date upon which the requested transcripts have been certified and made available to the Mondale for President Committee, Inc.

2) That the Mondale for President Committee, Inc., be afforded 15 days in which to file a response to the amended complaint. Such response would be due not later than May 3, 1984.

Attachments

1. Requests from the Mondale for President Committee, Inc.
2. Proposed letter to the Mondale for President Committee, Inc.

Mondale for President
2201 Wisconsin Avenue, N.W.
Washington, D.C. 20007
Telephone: 202-625-1600

MONDALE

18 P5:34

April 18, 1984

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

RE: MUR 1667

Dear Mr. Steele:

On April 6, 1984, the Mondale for President Committee, Inc. (the "Committee") received a copy of the above-referenced complaint filed by Americans with Hart, Inc. After review of the complaint, we concluded that it would be necessary for us to review all Commission agenda documents pertaining to the delegate regulations and the tapes of the Commission meetings at which they were discussed, in order to fully respond to the interpretation of those regulations put forth in the complaint.

On Monday, April 9, 1984, an attorney for the Committee requested the tapes and listened to the one that was available at that time for the meeting of January 31, 1980. The tape for February 14, 1980 was not available until April 11, 1984, at which time our attorney listened to it. The remaining tape was not ready until Friday, April 13, and was reviewed on Monday, April 16. At that time we concluded that, because of the quality of the tapes and their content, it would be necessary for us to review transcripts of the tapes. We requested copies of the transcripts in a letter hand delivered to your office on Monday, April 16.

In a followup to our written request for the transcripts, I contacted Steve Mims of your staff today who informed me that in no event would any of the transcripts be available before close of business Friday or Monday and that at least one has not yet been completed and circulated to the Commission for review. Since the essence of the complaint filed by Americans with Hart "turns in substantial degree" on the correct interpretation of the delegate regulations, Complaint at 26, it is critical for us to review these transcripts in preparation of our response.

Moreover, this complaint was filed at a time of heavy workload at the Committee and the 15-day response period includes this week's religious holidays.

Att. 1, p 1

Paid for by Mondale for President, Inc.

3504000091

For these reasons, we request an extension of time of 15 days to respond to this complaint, provided that allows us 5 days from receipt of the transcripts to review them and incorporate them into our response.

Thank you for your consideration of this request.

Sincerely,

Carolyn U. Oliphant

Carolyn U. Oliphant
Deputy General Counsel

3504050092

Att 1, p2

Mondale for President
2201 Wisconsin Avenue, N.W.
Washington, D.C. 20007
Telephone: 202-625-1600

MONDALE

April 19, 1984

HAND DELIVERED

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

RE: MUR 1667

Dear Mr. Steele:

This letter is to notify you that the Mondale for President Committee, Inc. (the "Committee") strongly disagrees with your conclusion that the additional 10-page brief and accompanying exhibits from the complainant in the above-referenced matter does not constitute an amendment to the complaint. The Committee is therefore entitled to 15 days from receipt to respond to these new allegations. This right to an opportunity to respond to an amended complaint is independent of our request for a 15-day extension of time which is routinely granted by the Office of General Counsel.

First, the amended complaint makes reference for the first time to additional delegate committees. Had the potential respondent committees been notified of the initial complaint, this would clearly constitute an amendment by virtue of its naming of additional respondents. Thus, the amendment raises new issues of coordination with different delegate committees. Second, the amendment raises a new allegation concerning what is alleged to be a reprint of Committee material by a delegate committee. This allegation was not made in the initial complaint. Third, the extensive recitation of additional alleged facts requires substantial additional effort to prepare the Committee's response. Several different committee employees must be located and statements must be obtained from them. Many of these additional individuals are presently located out of town. The assumption that we can possibly contact them and obtain statements from them when we received this amended complaint after 5:30 p.m. on the Wednesday before a holiday weekend is totally unwarranted. Thus, it is impossible for us to respond to these new allegations without the additional time to which we are entitled.

We note that the two additional newspaper articles submitted with the amendment are dated April 11 and April 14, yet the Hart campaign did not file its amendment until April 18. Counsel for the Hart campaign are well aware of the Commission's enforcement procedures. The Commission should not allow itself to be a party to an obvious attempt to prevent the Committee from exercising its statutory right to demonstrate that no action should be taken. The inflammatory language both of the initial complaint and the amendment is obviously intended to deprive the Committee of fair and impartial consideration of this

Att 1, p 3

Paid for by Mondale for President, Inc.

3504005093

matter by the Commission. It will be impossible for the Commission to give such consideration to this matter if the Committee does not have full opportunity and means to respond to Americans with Hart's outrageous charges.

We request that you immediately reconsider your conclusion that this submission does not constitute an amendment and notify the Committee accordingly. With regard to notifications, the attached letter was submitted to you over a month ago requesting that notifications be sent to us as General Counsel, and Deputy General Counsel. We have not received any response to this request, yet the notification of these complaints was addressed to Michael S. Berman, Treasurer.

Thank you for your prompt attention to this matter.

Sincerely,

David M. Ifshin
General Counsel

Carolyn U. Oliphant

Carolyn U. Oliphant
Deputy General Counsel

Attachment

cc: Lee Ann Elliott, Chairman
Thomas E. Harris, Vice Chairman
Joan D. Aikens
Danny Lee McDonald
John Warren McGarry
Frank P. Reiche

3504005094

Att 1, p4

Washington, D.C. 20037
Telephone: 202-625-1600

MONDALE

March 19, 1984

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

Dear Mr. Steele:

Attached is another form designating David M. Ifshin, General Counsel, and Carolyn U. Oliphant, Deputy General Counsel, as counsel for the Mondale for President Campaign Committee, Inc. This one was received in connection with MUR 1641. In order to ensure that we receive timely notification of all future matters, I would appreciate your acceptance of this designation of counsel for all matters as effective until revoked. Thus, counsel will receive an initial notification of any future matters filed against the Committee.

If you have any questions concerning this request, please contact Lyn Oliphant at 625-1780.

Sincerely,

Michael S. Berman
Treasurer

AH 1,P5

Paid for by Mondale for President, Inc.

STATEMENT OF DESIGNATION OF COUNSEL

NAME OF COUNSEL:

David M. Ifshin, Carolyn U. Oliphant

ADDRESS:

Mondale for President Committee, Inc.
2201 Wisconsin Avenue
Suite 100
Washington, D.C. 20007

TELEPHONE:

(202) 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.

3-14-84
Date

Michael S. Berman
Signature

NAME: Michael S. Berman

ADDRESS: Mondale for President Committee, Inc.
2201 Wisconsin Avenue
Washington, D.C. 20007

HOME PHONE: 342-9553

BUSINESS PHONE: 452-8387

3 5 0 4 0 5 0 0 0 9 5

Att 1, p6

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Ms. Carolyn U. Oliphant
Deputy General Counsel
Mondale for President Committee, Inc.
2201 Wisconsin Avenue, N.W.
Washington, DC 20007

Re: Requests for Extension in MUR 1667

Dear Ms. Oliphant:

This is in reference to your letters dated April 18, 1984, and April 19, 1984, requesting extensions of time in which to respond to the allegations contained in a complaint filed against the Mondale for President Committee, Inc., on April 6, 1984, and the amendment thereto filed on April 18, 1984.

The Commission has considered your two requests separately. On the basis of your request of April 18, 1984, the Commission has decided to grant an extension of time in which to file a response to the complaint as filed on April 6, 1984, of not more than five calendar days from the date upon which the transcripts which you requested by letter dated April 16, 1984, have been certified by the Commission and made available to you.

As to your second request, the Commission has decided to grant your request for a fifteen day period in which to file a response to the amended complaint. This fifteen day period does not affect the deadline for filing your response to the allegations raised in the complaint as originally filed.

Sincerely,

Charles N. Steele
General Counsel

Att. 2

3504300097

Mondale for President
2501 Wisconsin Avenue, N.W.
Washington, D.C. 20007
Telephone: 333-625-1600

MONDALE

Gen. Counsel

MUR 1667

April 19, 1984

HAND DELIVERED

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

21 APR 19 AM 11:12

RE: MUR 1667

Dear Mr. Steele:

This letter is to notify you that the Mondale for President Committee, Inc. (the "Committee") strongly disagrees with your conclusion that the additional 10-page brief and accompanying exhibits from the complainant in the above-referenced matter does not constitute an amendment to the complaint. The Committee is therefore entitled to 15 days from receipt to respond to these new allegations. This right to an opportunity to respond to an amended complaint is independent of our request for a 15-day extension of time which is routinely granted by the Office of General Counsel.

First, the amended complaint makes reference for the first time to additional delegate committees. Had the potential respondent committees been notified of the initial complaint, this would clearly constitute an amendment by virtue of its naming of additional respondents. Thus, the amendment raises new issues of coordination with different delegate committees. Second, the amendment raises a new allegation concerning what is alleged to be a reprint of Committee material by a delegate committee. This allegation was not made in the initial complaint. Third, the extensive recitation of additional alleged facts requires substantial additional effort to prepare the Committee's response. Several different committee employees must be located and statements must be obtained from them. Many of these additional individuals are presently located out of town. The assumption that we can possibly contact them and obtain statements from them when we received this amended complaint after 5:30 p.m. on the Wednesday before a holiday weekend is totally unwarranted. Thus, it is impossible for us to respond to these new allegations without the additional time to which we are entitled.

We note that the two additional newspaper articles submitted with the amendment are dated April 11 and April 14, yet the Hart campaign did not file its amendment until April 18. Counsel for the Hart campaign are well aware of the Commission's enforcement procedures. The Commission should not allow itself to be a party to an obvious attempt to prevent the Committee from exercising its statutory right to demonstrate that no action should be taken. The inflammatory language both of the initial complaint and the amendment is obviously intended to deprive the Committee of fair and impartial consideration of this

Paid for by Mondale for President, Inc.

3504005009

matter by the Commission. It will be impossible for the Commission to give such consideration to this matter if the Committee does not have full opportunity and means to respond to Americans with Hart's outrageous charges.

We request that you immediately reconsider your conclusion that this submission does not constitute an amendment and notify the Committee accordingly. With regard to notifications, the attached letter was submitted to you over a month ago requesting that notifications be sent to us as General Counsel, and Deputy General Counsel. We have not received any response to this request, yet the notification of these complaints was addressed to Michael S. Berman, Treasurer.

Thank you for your prompt attention to this matter.

Sincerely,

David M. Ifshin
General Counsel

Carolyn U. Oliphant

Carolyn U. Oliphant
Deputy General Counsel

Attachment

cc: Lee Ann Elliott, Chairman
Thomas E. Harris, Vice Chairman
Joan D. Aikens
Danny Lee McDonald
John Warren McGarry
Frank P. Reiche

3504050097

Mondale for President
2231 Wisconsin Avenue, N.W.
Washington, D.C. 20007
Telephone: 202-625-1600

MONDALE

March 19, 1984

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

Dear Mr. Steele:

Attached is another form designating David M. Ifshin, General Counsel, and Carolyn U. Oliphant, Deputy General Counsel, as counsel for the Mondale for President Campaign Committee, Inc. This one was received in connection with MUR 1641. In order to ensure that we receive timely notification of all future matters, I would appreciate your acceptance of this designation of counsel for all matters as effective until revoked. Thus, counsel will receive an initial notification of any future matters filed against the Committee.

If you have any questions concerning this request, please contact Lyn Oliphant at 625-1780.

Sincerely,

Michael S. Berman
Treasurer

Paid for by Mondale for President, Inc.

STATEMENT OF DESIGNATION OF COUNSEL

NAME OF COUNSEL:

David M. Ifshin, Carolyn U. Oliphant

ADDRESS:

Mondale for President Committee, Inc.
2201 Wisconsin Ayenue
Suite 100
Washington, D.C. 20007

TELEPHONE:

(202) 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.

3-14-84
Date

Michael S. Berman
Signature

NAME: Michael S. Berman

ADDRESS: Mondale for President Committee, Inc.
2201 Wisconsin Avenue
Washington, D.C. 20007

HOME PHONE: 342-9553

BUSINESS PHONE: 452-8387

3504001

35040500192

MONDALE

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

Mondale for President
2105 Wisconsin Avenue, N.W.
Washington, D.C. 20007
Telephone: 202-625-1984

MONDALE

OCC 1177

18 P5:34

April 18, 1984

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

RE: MUR 1667

Dear Mr. Steele:

On April 6, 1984, the Mondale for President Committee, Inc. (the "Committee") received a copy of the above-referenced complaint filed by Americans with Hart, Inc. After review of the complaint, we concluded that it would be necessary for us to review all Commission agenda documents pertaining to the delegate regulations and the tapes of the Commission meetings at which they were discussed, in order to fully respond to the interpretation of those regulations put forth in the complaint.

On Monday, April 9, 1984, an attorney for the Committee requested the tapes and listened to the one that was available at that time for the meeting of January 31, 1980. The tape for February 14, 1980 was not available until April 11, 1984, at which time our attorney listened to it. The remaining tape was not ready until Friday, April 13, and was reviewed on Monday, April 16. At that time we concluded that, because of the quality of the tapes and their content, it would be necessary for us to review transcripts of the tapes. We requested copies of the transcripts in a letter hand delivered to your office on Monday, April 16.

In a followup to our written request for the transcripts, I contacted Steve Mims of your staff today who informed me that in no event would any of the transcripts be available before close of business Friday or Monday and that at least one has not yet been completed and circulated to the Commission for review. Since the essence of the complaint filed by Americans with Hart "turns in substantial degree" on the correct interpretation of the delegate regulations, Complaint at 26, it is critical for us to review these transcripts in preparation of our response.

Moreover, this complaint was filed at a time of heavy workload at the Committee and the 15-day response period includes this week's religious holidays.

Paid for by Mondale for President, Inc.

3504001103

For these reasons, we request an extension of time of 15 days to respond to this complaint, provided that allows us 5 days from receipt of the transcripts to review them and incorporate them into our response.

Thank you for your consideration of this request.

Sincerely,

Carolyn U. Oliphant

Carolyn U. Oliphant
Deputy General Counsel

35040500104

Lyn Oliphant
Mondale for President
2201 Wisconsin Avenue
Suite 100
Washington, D.C. 20007

3504050013

MONDALE

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

MUR 1667

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1984

HAND DELIVERED

Carolyn U. Oliphant
Deputy General Counsel
Mondale For President
2201 Wisconsin Avenue, N.W.
Washington, D.C. 20007

Dear Ms. Oliphant:

This letter is in response to your oral request for all documents in the Commission's possession relating to the adoption of Commission guidelines and regulations on delegate selection. We have attached copies of all documents on the public record which pertain to the subject of your request.

Sincerely,

Charles N. Steele
General Counsel

Attachments

3504050105

Mondale for President
2201 Wisconsin Avenue, N.W.
Washington, D.C. 20007
Telephone: 202-625-1600

MONDALE

GCC#2165
MUR 1667

82 APR 18 A9:29

April 17, 1984

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

Dear Mr. Steele:

This is to confirm my oral request for copies of all public Commission documents pertaining to delegate regulations. I appreciate your prompt consideration of this request.

Sincerely,

Lyn Oliphant

Lyn Oliphant
Deputy General Counsel

LO/jhl

Paid for by Mondale for President, Inc.

3504030107

Mondale for President
2201 Wisconsin Avenue, N.W.
Washington, D.C. 20007
Telephone: 202-625-1980

MONDALE

GCC#2150
MUR 1667

18 P5:33

April 16, 1984

17 AM 9:24

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

Dear Mr. Steele:

This letter is to request on behalf of the Mondale for President Committee ("the Committee") transcripts of Commission meetings on or about December 18, 1979, January 31, 1980, and February 14, 1980 where the Commission considered delegate regulations.

An attorney has attempted to listen to the tapes of the meetings on our behalf. Because these tapes are very difficult to follow, it is necessary for the Committee to review transcripts of the meetings in order to adequately respond to the analysis of the Commission's delegate regulations by the Complainant in MUR 1667, Americans with Hart, Inc. against Mondale for President Committee, Inc.

We appreciate your cooperation in this matter, and if there are any problems, please call me at 625-1780.

Sincerely,

Lyn Oliphant

Lyn Oliphant
Deputy General Counsel

Paid for by Mondale for President, Inc.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1667
Mondale for President Committee, Inc.)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session held on April 12, 1984, do hereby certify that the Commission took the following actions in MUR 1667:

1. Decided by a vote of 6-0 to deny the Complainant Americans With Hart, Inc., request that the time for the respondent to submit a response to the complaint be reduced from fifteen days to five days.

2. Decided by a vote of 6-0 that the Commission not seek immediate injunctive and declaratory relief in the court at this time as requested by Complainant.

3. Decided by a vote of 6-0 that the Commission schedule a special executive session for Thursday, April 26, 1984, to start at the conclusion of the public session already scheduled for that date, in order to consider MUR 1667.

4. Decided by a vote of 6-0 that if a request for an extension of time is received from either party in this matter, that the request be referred to the Commission for approval or disapproval

Commissioners Aikens, Elliott, Harris, McDonald, McGarry, and Reiche voted affirmatively for each of the decisions.

Attest:

4-12-84
Date

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

3504005010 3

Mondale for President
2201 Wisconsin Avenue, N.W.
Washington, D.C. 20007
Telephone: 202-625-1600

MONDALE

GCC#2150

MUR 1667

18 P5:33

April 16, 1984

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

17 A9:24

Dear Mr. Steele:

This letter is to request on behalf of the Mondale for President Committee ("the Committee") transcripts of Commission meetings on or about December 18, 1979, January 31, 1980, and February 14, 1980 where the Commission considered delegate regulations.

An attorney has attempted to listen to the tapes of the meetings on our behalf. Because these tapes are very difficult to follow, it is necessary for the Committee to review transcripts of the meetings in order to adequately respond to the analysis of the Commission's delegate regulations by the Complainant in MUR 1667, Americans with Hart, Inc. against Mondale for President Committee, Inc.

We appreciate your cooperation in this matter, and if there are any problems, please call me at 625-1780.

Sincerely,

Lyn Oliphant

Lyn Oliphant
Deputy General Counsel

Paid for by Mondale for President, Inc.

3504050102

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 12, 1984

John M. Quinn
General Counsel
Americans With Hart, Inc.
507 Eighth Street, S.E.
Washington, D.C. 20003

Re: Complaint filed by
Americans With Hart,
Inc., MUR 1667

Dear Mr. Quinn:

The Commission, on April 12, 1984, voted to deny the request of your committee for an immediate motion to enjoin the activities alleged in your committee's complaint. Section 437g(a)(1) of the Federal Election Campaign Act of 1971, as amended ("the Act"), and section 111.6 of the Commission's Regulations, provide that the respondent in this matter be provided fifteen days in which to demonstrate that no action should be taken against them prior to a Commission determination to make any finding against a respondent or take any action, other than an action dismissing the complaint. Accordingly, the Commission has also voted to deny your request that the Mondale for President Committee, Inc., be required to respond to your complaint within five days. Of course, if, after the appropriate statutory period, the Commission determines there is reason to believe that a violation of the Act has occurred, or is about to occur, it will proceed with an investigation as quickly as possible, and seek any relief that the Commission may deem necessary.

If you have any questions, please contact Stephen Mims, the staff member assigned to this matter at (202)523-4000.

Sincerely,

Charles N. Steele

Charles N. Steele
General Counsel

3504005011 0

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 12, 1984

Michael S. Berman, Treasurer
Mondale for President Committee, Inc.
2201 Wisconsin Avenue, N.W.
Washington, D.C. 20007

Re: Complaint filed by
Americans With Hart,
Inc., MUR 1667

Dear Mr. Berman:

As you are aware, the Commission, on April 6, 1984, received a complaint filed by Americans With Hart, Inc. (complainant), that alleges violations of the Federal Election Campaign Act of 1971, as amended ("the Act"), by the Mondale for President Committee, Inc. In that complaint, the Commission was requested to provide extraordinary relief, including the filing of an immediate motion to enjoin the activities alleged in the complaint and to limit the time period for filing a response to the complaint to five days. The Commission, on April 12, 1984, voted to deny the request of the complainant for an immediate motion to enjoin the activities alleged in the complaint. Section 437g(a)(1) of the Federal Election Campaign Act of 1971, as amended ("the Act"), and section 111.6 of the Commission's Regulations, provide that the respondent in this matter be provided fifteen days in which to demonstrate that no action should be taken against them prior to a Commission determination to make any finding against a respondent or take any action, other than an action dismissing the complaint. Accordingly, the Commission has also voted to deny complainant's additional request that the Mondale for President Committee, Inc., be required to respond to the complaint within five days. Of course, if, after the appropriate statutory period, the Commission determines there is reason to believe that a violation of the Act has occurred, or is about to occur, it will proceed with an investigation as quickly as possible, and seek any relief that the Commission may deem necessary.

If you have any questions, please contact Stephen Mims, the staff member assigned to this matter at (202)523-4000.

Sincerely,

Charles N. Steele

Charles N. Steele
General Counsel

3 3 0 4 0 5 0 1 1 1

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

84 APR 9 P3: 18

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 9, 1984

MEMORANDUM

TO: The Commission

FROM: Charles N. Steele
General Counsel

SUBJECT: MUR 1667 - Complaint of Americans With Hart, Inc. against Mondale For President Committee, Inc.

On April 6, 1984, Americans With Hart, Inc. filed a complaint against the Mondale for President Committee, Inc. alleging violations of the Federal Election Campaign Act of 1971, as amended and the Commission regulations involving the activities of delegates and delegate committees. Respondents were notified of the complaint that same day. In part, the complaint requests expedited action involving an immediate determination by the Commission concerning these activities and that the Commission authorize the General Counsel to seek immediate injunctive and declaratory relief in court without waiting for responses from the respondents.

The Office of General Counsel has preliminarily reviewed this matter and does not believe that the circumstances of this case warrant such extraordinary action be taken and that the Mondale Committee be allowed the opportunity to respond provided for under the statute.

9504005011 2

AMERICANS WITH HART, INC.

507 - 8th STREET, S.E.

WASHINGTON, D.C. 20003

May 22, 1984

Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20005

Re: Complaint of Americans With Hart, Inc.
v. Mondale For President Committee, Inc.,
Filed April 6, 1984, MUR 1667

Dear Commissioners:

We write to express our dismay at the failure of the Commission to act promptly and effectively on the complaint brought by Americans With Hart against the Mondale campaign. We write, also, to urge the Commission to recognize the serious, continuing effect of the illegalities associated with the Mondale delegate committee scheme and to take immediate action to prevent these illegalities from further tainting the 1984 presidential election process.

Finally, in view of the numerous contradictory statements of the Mondale campaign regarding this matter, we have urged the Mondale campaign to provide a full accounting of the funds spent by the delegate committees and to open to the public the entire record of this proceeding -- including our complaint, their answer, and any "negotiations" it has with the Commission. We urge the Commission to act affirmatively on any such request of the Mondale campaign.

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1. That Excessive Campaign Contributions Have Been Made And Received Is Beyond Question. On April 27, 1984, Mr. Mondale adopted his delegate committees and agreed to treat them as affiliated with his campaign. (See Exhibits A and B) Thus, these committees and the principal Mondale campaign committee are subject to the aggregation requirements of 11 C.F.R. §§110.1 and 110.2. And, it is obvious from the Commission's records and public press reports that both individuals and political committees made contributions in excess of the $1000 and $5000 limitations to the Mondale campaign through its principal committee and its delegate committees. (See, e.g., Exhibit C)

2. The Pernicious Impact Of These Excessive Contributions Is Continuing. On April 27, 1984, Mr. Mondale also announced that he would return the excessive contributions (and all political action committee contributions) accepted by his delegate committee. But, on April 28 and May 2, 1984 his campaign said it could not do so -- not, that is, until it got all the electoral benefit it could from receiving them. (See Exhibits D and E)

These excessive contributions had their immediate impact in state primaries such as Illinois, Florida, New York and Pennsylvania. But they continue to have an impact inasmuch as the refusal to refund them permits these dollars

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to be spent in upcoming primaries. Money is available now to the Mondale campaign that would have had to be spent earlier by the campaign but for its delegate committee scheme.

3. The Commission Is Not Powerless To Act. Since this complaint was filed on April 6, 1984, there has been amassed enormous public evidence regarding the Mondale delegate committee scheme. Under these unusual circumstances of public reports of excessive contributions, more than ample time has passed to permit a probable cause finding under 11 C.F.R. § 111.17. Indeed, news reports in which Mr. Mondale or his staff acknowledge "negotiations" with the Commission suggest that the conciliation process of 11 C.F.R. § 111.18 has commenced. We read subsection (c) of that section as requiring a conciliation process of just 15 days -- precisely because, when violations are suspected shortly before a primary or election, the Commission is expected to act to prevent those violations from affecting the electoral process.

The time to act has come. Mr. Mondale's most recent commitment -- unfulfilled as far as we can tell -- to "escrow" $400,000 is inadequate. Published press reports and the Commission's records suggest that the amount in

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question could be nearly twice that high. (See Appendix F)

The Commission should immediately seek injunctive relief putting an end to the ongoing effects of the violation so obvious to the public and seeking return of the excessive contributions before the last round of primaries on June 5.

Sincerely,

John M. Quinn

John M. Quinn
General Counsel
Americans With Hart, Inc.

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of the Complaint of Americans With Hart, Inc., Complainant, -against- Mondale For President Committee, Inc., Respondent.	MUR 1667

EXHIBITS TO LETTER OF
AMERICANS WITH HART, INC.,
DATED MAY 22, 1984

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EXHIBIT A

THE WASHINGTON POST
SATURDAY, APRIL 28, 1984
P. 1, COLS. 2, 3, 4

(P. 1 OF 2)

Mondale Agrees to Return Disputed Funds

By David Hoffman and Dan Balz
Washington Post Staff Writers

LUBBOCK, Tex., April 27—Walter F. Mondale bowed today to criticism from Sen. Gary Hart (D-Colo.) and agreed to refund contributions made to the 129 disputed delegate committees supporting his presidential campaign.

Mondale also said that the money spent by the committees would be counted against overall federal spending limits, further crimping his already strapped national campaign organization.

"In retrospect, I think these committees should not have been created," Mondale told reporters at an impromptu news conference here.

Only two days ago, when he asked the controversial delegate committees to disband, Mondale refused to refund the contributions they had received from arms of organized labor.

But aides said he reversed himself last night after reports in The Washington Post stating that there appeared to be a striking pattern of coordination between the supposedly independent delegate committees and the national Mondale campaign, as well as between the committees.

Federal Election Commission records showed that the delegate committees were temporarily hiring staff from Mondale's national organization, twice transferring money to sister committees in states with crucial primaries and caucuses coming up, and were continuing to accept political action committee (PAC) contributions from organized labor and other special-interest groups even though Mondale had refused such donations for

See MONDALE, A12, Col. 1

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EXHIBIT A

THE WASHINGTON POST
SATURDAY, APRIL 28, 1984
P. A13, COLS. 1, 2, 3

Mondale to Return Disputed Funds

MONDALE, From A1

his organization, Mondale for President Inc.

Hart told reporters in Nashville, where he was campaigning, that he was pleased to hear of Mondale's decision to return the disputed contributions. But he added:

"Whether he would have made it on his own without public pressure, without the scrutiny that has gone on in the last couple of weeks, is a question that remains open."

Hart asserted that Mondale's primary and caucus victories in Illinois, New York, Pennsylvania and Wisconsin are now "tainted" by the fact that his campaign relied heavily on financing through delegate committees in those states.

The Colorado senator has filed a complaint with the FEC questioning the autonomy of the delegate committees and the legality of the big contributions they received from PACs and individuals who had also contributed to the national Mondale campaign. Mondale's legal response is due Monday and his aides said that this determined the timing of his announcement today.

Hart said he hoped Mondale's campaign would join his in seeking an expedited ruling from the FEC. He also called on Mondale to provide a full accounting of how much money flowed into the delegate committees and the sources of those funds. Many of them have yet to submit their reports to the FEC.

Mondale said his campaign would "voluntarily take the position, for purposes of resolving this matter," that the delegate committees will be "treated as having been affiliated with our campaign."

He said his lawyers had informed him that the committees were "defensible" if he wanted to fight Hart's complaint before the FEC, but he decided "that's not enough."

Contributions to the 129 committees could total $700,000. Of that, more than $300,000 came from PACs and an undetermined amount from individuals who also contributed to Mondale for President Inc. The refunds consequently will be in two categories.

First, Mondale give back all the PAC contributions, because he had vowed that he would not accept them for his national campaign. Second, he will return donations to delegate committees that exceed the $1,000 limit on individual donations to a single campaign. Thus, a donor who gave $1,000 to Mondale's national committee and $1,000 to a delegate committee would get a $1,000 refund.

Mondale's decision will hurt financially. Most of the delegate committee money has been spent and he will have to make the reimbursements out of his treasury—in many cases for expenses that Mondale strategists would have forgone, such as palm cards and yard signs for a labor delegate for Mondale in a race against a non-labor delegate for him.

Mondale's move will also put him as much as $700,000 closer to the $20.2 million federal spending limit for the pre-convention phase of the campaign. He will have that much less to spend in the fight against Hart and, in addition, will have to assume some expenses that delegate committees might have covered, especially in the expensive California primary June 5.

Mondale officials estimate that they have already used up about $15 million of the $20.2 million maximum. Mondale said he was confident that his campaign was in no danger of hitting the limit, "but even if it were, I would have" returned the donations.

The key issue in the dispute, campaign officials said, was the question of how autonomous the committees had been. The officials said Mondale concluded after reading reports in The Post that it wasn't worth the fight even if his lawyers thought he could win.

"I'm not in this to win a lawsuit. I'm in this to win the presidency," Mondale told his staff aides Thursday night during a four-hour meeting, according to one aide who was there.

Mondale advisers said that treating the delegate committees as "affiliated" with the national campaign was a necessary step before the campaign could return the PAC money.

They also acknowledged that this will have put the Mondale campaign beyond the permissible spending limit in the New Hampshire primary campaign and perhaps in the Maine caucuses. Hart won both of those states.

The termination papers of the first of the 129 committees to disband, the 17th District Mondale Delegate Committee of Rock Island, Ill., arrived at the FEC today. The group said it had returned the more than $2,500 surplus it had had on hand, sending back $1,042 to the United Auto Workers and $1,563 to the AFL-CIO's Committee on Political Education.

Other committees, however, evidently had no plans to shut down. Jim Margolis, Mondale's North Carolina coordinator, said officials of the only such committee in that state, based in Greensboro, refused his plans to close down at a meeting Thursday.

Another committee that has no intention of shutting down is the Mondale Delegates-D.C. Committee, which is moving ahead with its plans to get out the vote in Tuesday's primary in the District of Columbia. Its treasurer, Washington Teachers Union president William H. Simons, said yesterday morning that he had just banked a chunk of contributions the day before, including an April 9 contribution of $860 from the Operating Engineers union.

The D.C. Committee will spend about $35,000 before it is done, Simons estimated. Some contributions, he said, were still trickling in.

Staff writers George Lardner Jr. and Martin Schram contributed to this report.

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EXHIBIT 3

THE NEW YORK TIMES
SATURDAY, APRIL 28, 1984
P. 1, COL. 1

MONDALE DECIDES TO RETURN FUNDS TO LABOR GROUPS

BOWS TO RIVALS' CRITICISM

Says the Spending of Delegate Units Will Be Counted as His Own Under U.S. Lid

By RICHARD WEINRAUB
Special to The New York Times

LUBBOCK, Tex., April 27 — Walter F. Mondale, bowing to criticism from his rivals for the Democratic Presidential nomination, announced today that he would return about $800,000 contributed to committees supporting delegates who back his candidacy.

Mr. Mondale acted two days after announcing that he would terminate all such committees but would not return the money they had raised. On Thursday he had told reporters that it was all right for the groups to keep the money, which came largely from organized labor.

Mr. Mondale said that, because of questions raised about the finances of the delegate committees, the money the groups had spent in behalf of the Mondale candidacy would be counted toward his $20.3 million Federal limit on spending in the nomination battle.

Questions About Independence

The groups were set up to be independent of the Mondale campaign so it began facing a financial squeeze in January that threatened to push the campaign up to the Federal spending limit in the spring, at a time of critical primaries and caucuses. Senator Gary Hart has said the committees were aligned with the Mondale campaign and thus illegal.

In Nashville, Senator Hart said he was pleased with Mr. Mondale's decision but that many questions still remained about the former Vice President's victories in some states. In Louisiana, the Rev. Jesse Jackson, also praised the decision.

In his unexpected announcement today, Mr. Mondale said that because Federal elections laws were "not well-defined" and were "ambiguous," he wanted "to resolve this matter and remove any lingering doubts" about the financing of his campaign.

"I believe that public servants, in-

Continued on Page 8, Column 3

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EXHIBIT B

THE NEW YORK TIMES
SATURDAY, APRIL 28, 1984
P. 8, COLS. 3, 4, 5

Mondale to Return PAC Money of Delegate Units

Continued From Page 1

cluding unions, have a duty not just to avoid impropriation but to avoid the appearance of impropriety," Mr. Mondale told a news conference here after a picnic at the Lubbock Civic Center.

Mr. Mondale added, "The blurred standards governing delegate committees lead me to direct my campaign to take additional steps."

He said his campaign would inform the Federal Election Commission that "we will refund all contributions made to delegate committees which would not have been acceptable if made to the campaign directly."

Maxine Isaacs, Mr. Mondale's press secretary in Washington, said in a telephone interview that the $500,000 estimate of what would be returned included contributions from political action committees of organized labor, as well as any contributions in excess of $1,000 made by individuals.

Mr. Mondale and Mr. Hart have both vowed not to accept PAC money. A contested Federal law bars individuals from giving more than $1,000 to a Presidential campaign, and PAC's from giving more than $5,000. But some contributors are giving the maximum amount to each of many states' delegate committees. Mondale aides said they did not have an estimate on the total of any such contributions.

A Sudden Change of Mind

On Wednesday, Mr. Mondale ordered the termination of all 117 delegate committees. This prompted Senator Hart to say Mr. Mondale should "take one simple cleansing step" and return the labor money gathered by the committees. Mr. Jackson made similar comments.

Mr. Hart, in a complaint to the Federal Election Commission, had said the committees were set up illegally by the Mondale organization to avoid campaign laws and to pour "hundreds of thousands of political action committee" money into the campaign through the supposedly independent grass-roots delegate groups.

Although there had been growing evidence linking the Mondale organization to the committees, Mr. Mondale had insisted in recent days that the committees were "operating on their own" and that his campaign had not "been involved with them."

Mr. Mondale said his lawyers told him that the committees were "legally defensible." But he said, "It's far more important to me to make clear my deep commitment to ethical performance than to have what ethical advantage that money difference will make."

Mr. Mondale said his delegate committees would lose their independent status and be directly "affiliated with our campaign."

"We will refund all contributions made to delegate committees which would not have been acceptable if made to the campaign directly, including PAC contributions and individual contributions that would exceed campaign limits," Mr. Mondale said, referring to the $1,000 individual limit.

He added that, with the committees placed under the wing of the Mondale organization, "we will count all the expenditures of all delegate committees against the overall spending limits of the campaign."

Mondale aides said the delegate committees had raised an estimated $900,000 and had spent most of that.

Miss Isaacs, the press secretary, said contributions of about $200,000 were not being returned because they had been deemed legal and in compliance with Federal election laws.

She said the Mondale campaign had so far spent about $14.8 million of the $20.3 million campaign limit. Mondale aides said this did not include the money spent by the delegate groups.

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EXHIBIT C

PAC Funds Questioned

Money for Mondale May Be Illegal

By Brooks Jackson
Staff Reporter of The Wall Street Journal

WASHINGTON—Walter Mondale's presidential campaign is being fueled by fat donations from labor that some legal experts say may violate the law.

Records submitted to the Federal Election Commission show that well over 100 state-level Mondale "delegate committees" have been set up since January and have received more than $267,000 from political-action committees run by unions. The trend suggests that the total given during February and March alone could exceed $400,000 by the time a full accounting is received.

PACs legally can't give more than $5,000 directly to Mr. Mondale's central campaign committee, and in any case the former vice president has declined to accept such donations directly on ethical grounds. But some union PACs are giving larger total amounts to the supposedly independent committees that were set up at the instigation of the Mondale camp.

The American Federation of Teachers has spread $84,300 to 36 of the delegate committees, for example. The United Auto Workers has given at least $32,500. The American Federation of State, County and Municipal Employees has given at least $43,200 and the Communications Workers of America has given at least $23,500.

"If this is all being orchestrated by the same group of people, it would not be legal," says Jan Baran, chairman of the American Bar Association's Committee on Election Laws.

Mr. Baran is a Republican. A leading Democratic election-law expert, William Oldaker, says simply "no comment" when asked if the Mondale campaign's use of the delegate committees is legal.

The election commission currently is considering an official protest filed last week by Sen. Gary Hart's campaign.

Grass-Roots Organizations

At issue is whether the delegate committees, which Congress envisioned as grass-roots organizations, are being run from Mr. Mondale's campaign headquarters in Washington to get around legal limits on what he can raise and spend. If so, then some argue that the contribution limits apply collectively to all the Mondale entities, and PACs that have given a total of more than $5,000 to them have violated the law.

The Mondale campaign says the committees are legal, even though they have been set up with the active encouragement and advice of Mondale headquarters, because they have separate treasurers and make their own decisions. "We have no control," says Robert Beckel, Mr. Mondale's campaign manager.

Reports received at the Election Commission, however, show that the committees are being funded largely by PACs run by unions that are in close cooperation with the Mondale campaign organization, and that the committees themselves have numerous links to the campaign staff and to one another.

The American Federation of Teachers, for example, sent out most of its donations from its Washington office during three days in late March. The auto workers sent six identical checks for $5,000 apiece to six Mondale committees in Illinois on a single day.

Reappear on Payrolls

Furthermore, many campaign workers have been dropped from the payroll of the central Mondale committee only to reappear on the payrolls of the supposedly grass-roots committees.

Before the Wisconsin caucuses on April 7, for example, a Mondale delegate committee in Madison had 13 people on salary. All had been on the payroll of the central Mondale campaign committee in February.

This "grass-roots" group raised only $56 locally during March. The rest of its financing consisted of two $5,000 checks from Washington-based labor unions and a transfer of $3,000 from another Mondale delegate committee in Michigan, which apparently had a surplus after the caucuses in that state on March 17.

Based on reports filed so far, it appears that more than 80% of the money received by Mondale delegate committees is coming from labor PACs, and nearly all that is coming from the unions' national headquarters rather than from local unions. And so far, more than 30 former Mondale campaign employees have switched to the payrolls of Mondale delegate committees.

Rolling Funds Forward

As delegate committees in one state finish their work, they often roll any surplus funds forward to another delegate committee in another state where a presidential-nomination contest is coming up. In mid-March for example, two Mondale committees in New Hampshire forwarded a total of $4,000 to a delegate committee in Chicago. After the Illinois primary on March 20, two Illinois committees forwarded $3,300 to a delegate committee in Kansas, which held its caucuses on March 24.

Some Mondale delegate committees are distributing literature that doesn't mention delegates at all, only Mr. Mondale. The Wisconsin organization simply reprinted some fliers produced by Mondale headquarters.

By using the delegate committees for field work, the main Mondale campaign committee is free to spend more of its own, limited funds on advertising. Further, the committees open up access to labor-PAC money.

The green light was flashed in a Jan. 12 memo to delegates by Elaine Kamarck at Mondale headquarters. "Political Action Committees can contribute up to $5,000 to a delegate committee," she said. And, though noting that Mr. Mondale wasn't taking PAC gifts, she said, "Each delegate committee may make their own decision."

When the first PAC gifts showed up publicly much later, Mr. Mondale insisted he had no control over the delegate committees. "I issued a statement saying I wanted it stopped. . . . I'm opposed to the use of PAC money," he said on March 31.

But the latest reports show that by then PACs had given plenty, and that delegate committees have continued to accept labor-PAC gifts. Delegate committees reported accepting a total of $11,300 in PAC money during the first few days of April.

The Federal Election Commission isn't expected to decide the matter until after the last wave of primaries on June 5, too late to do Mr. Hart any good. And if it approves Mr. Mondale's use of the delegate committees, it would set a precedent that would allow practically unlimited spending by future presidential candidates. Mr. Baran, the Republican lawyer, says of the Mondale tactic, "It kind of makes Swiss cheese out of the election laws."

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RADIO TV REPORTS, INC.
4701 WILLARD AVENUE, CHEVY CHASE, MARYLAND 20815 (301) 656-4068

FOR ICANS WITH HART, INC.

PROGRAM NBC Nightly News STATION WRC TV
NBC Network

DATE April 28, 1984 6:30 PM CITY Washington, DC

SUBJECT PAC Money

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CONNIE CHUNG: Gary Hart is not letting up on Walter Mondale for allowing his delegate committees to accept Political Action Committee money from labor unions, even though Mondale has promised to give the money back. Today Hart questioned the validity of Mondale's victories in three important states, victories Hart says are tainted by the money.

With more on the issue that won't go away, Lisa Myers on the Mondale campaign.

LISA MYERS: While Mondale tried to focus on more pleasant matters, aides acknowledged that the campaign does not now have enough cash to immediately refund the more than $300,000 in questionable campaign contributions from labor. They said the money will have to be raised and then returned under procedures worked out with the Federal Election Commission.

Mondale continued to maintain he's done nothing illegal nor improper.

WALTER MONDALE: I believe, my lawyers believe that everything we've done is legally defensible. That's not enough. So I felt that we had to do what we did.

MYERS: Gary Hart charged that while Mondale may be giving back the labor money, he isn't giving back all the unfair help it provided in crucial primaries in Illinois, New York and Pennsylvania.

GARY HART: Whether he ought to give back the delegates is something perhaps the party wants to consider.

MYERS: The delegate committees helped Mondale through the darkest days of the campaign, fueled by hundreds of thousands of dollars from labor unions, contributions which would have been illegal if made directly to the Mondale campaign. The committees paid for headquarters, campaign workers, signs, even balloons for Mondale rallies. Earlier this week Mondale still was defending the operation.

MONDALE: ...is perfectly legal, perfectly proper, and authorized by the Federal Election Commission. So I have no apologies to make about that at all.

MYERS: But as more details became public, Mondale was buffeted by charges of potential illegality. He began to back pedal. Wednesday:

MONDALE: I am asking that these committees be terminated, period. Ended.

MYERS: Thursday he was asked whether he would give back the money.

MONDALE: Of course not. It's -- first of all, I didn't get the money. It went to the autonomous committees.

MYERS: But Friday:

MONDALE: We will refund all contributions made to these committees which would not have been acceptable if made to the campaign directly.

MYERS: Although the Federal Election Commission still could impose penalties, Mondale's advisors pronounced this controversy over. But some aides worry that it has tarnished Mondale's image and rekindled concerns about his relationship with organized labor.

Lisa Myers, NBC News, with the Mondale campaign in New Orleans.

CHUNG: Jesse Jackson today applauded Mondale's decision to return the contributions, but Jackson demanded that Mondale give him the delegates Jackson says were bought by that money.

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EXHIBIT E

EXHIBIT 8

THE WASHINGTON POST
WEDNESDAY, MAY 2, 1984
P. A13, COL. 1, 2, 3

Mondale Is in Good Financial Shape

By Thomas B. Edsall
Washington Post Staff Writer

Despite Walter F. Mondale's decision to pay back about $350,000 raised by his controversial delegate-candidate committees, he will be able to outspend his rivals in the closing weeks of the contest for the Democratic presidential nomination, according to campaign officials.

Mondale has been taking in about $300,000 a week, finance director Tim Finchem said yesterday. That healthy cash flow, combined with federal matching grants, will enable the campaign to spend from $2.5 million to $3 million from the start of this month through the major primaries on June 5, which include California and New Jersey, he said.

Conversely, fund-raising for Sen. Gary Hart (D-Colo.) has taken a nose dive since his defeat March 20 in the Illinois primary.

Oliver (Pudge) Henkel, Hart's campaign manager, said contributions have dropped from over $100,000 a day, or $700,000 to $850,000 a week, to under $40,000 a day.

Jesse L. Jackson has been running a shoestring campaign, spending no money on television advertising. By the end of March, he had spent $2.1 million, compared with $7.1 million by Hart and $13.3 million by Mondale.

In early March, Mondale not only was reeling from losses to Hart in New England but also was facing the prospect of being outspent by Hart during the rest of the campaign. Mondale spent huge sums in 1983 and in the first two months of 1984, while Hart had spent next to nothing during that period. With a $20.2 million federal spending limit, Hart had more than enough running room, and donations were were pouring in. But Mondale was in danger of bumping into the federal limit in the final weeks of the campaign.

He Might Outspend Foes in Final Weeks

In addition, Mondale last week renounced the use of "delegate committees" that had spent money on his behalf without it counting against his federal spending limit. He promised to pay back all political action committee (PAC) donations made to the committees and all individual contributions exceeding $1,000—at a cost of $250,000 to $350,000 to his campaign.

He also agreed to count against his spending limit the $450,000 to $500,000 these committees spent. The decision increased the danger that Mondale would be massively outspent in the closing weeks of the campaign.

But the sharp decline in the volume of contributions to Hart has ended that danger, at least for the moment.

Finchem said that, as of the end of April, the Mondale campaign had spent about $15 million against the $20.2 million federal cap. When the money spent by delegate committees is added to the total, Mondale will have about $4.6 million left to carry the campaign through the convention in July.

"We can get by on what we have at least to June 5 [the final major primary day] even if we have to have an all-volunteer convention operation," Finchem said.

Hart seems to be in no danger of hitting the federal spending limit since he remains about $10 million under it.

And Henkel said Hart's reduced cash flow means Mondale probably will outspend him through June 5.

In addition, Finchem said Mondale's repayment of delegate-committee money probably will not be made until after the California and New Jersey primaries, further lessening his cash-flow problems.

While Mondale plans to pay back PAC contributions and large individual contributions made to delegate committees, he has a much smaller debt to pay than Hart.

At the end of March, Hart reported that he owed $4.2 million, and Henkel said the current debt is about the same. Mondale reported debts at the end of March of $1.9 million, less than half of Hart's.

Henkel said the Hart campaign will not have to start repaying loans until after the June 5 primaries, so the debt will not interfere with spending during those potentially crucial contests.

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THE WASHINGTON POST, May 18, 1984, page A1

Hart Sharpens Attack on Mondale's 'Tainted' Delegates

By Milton Coleman
and Bill Peterson
Washington Post Staff Writers

Sen. Gary Hart (D-Colo.) yesterday sharpened his attacks on what he has termed Walter F. Mondale's "tainted" national convention delegates as part of an intensifying effort to derail Mondale's front-running bid for the Democratic presidential nomination. He also launched an all-out appeal to uncommitted and unpledged delegates.

Mondale, meanwhile, moved to counter Hart. He announced the establishment of an escrow account to speed the repayment of what Hart contends were illegal campaign funds spent by some of Mondale's delegate candidate election committees in some primary states.

Mondale also spent part of the day huddling with supporters from New Jersey and California, where key primaries will be held June 5.

Hart, in a morning interview with reporters, editors and editorial writers of The Washington Post, said about one-third of the delegates pledged to Mondale may have been elected with illegal funds.

There would be "a tremendous cloud" over Mondale as the party's nominee, Hart said, giving the Republicans a "ready-made issue."

"This is or will become not a political issue but a legal or ethical issue," Hart said. "This is not a Hart issue; this is a DNC issue. The Democratic National Committee sooner or later is going to have to face up to that question itself."

He was referring to 507 of the more than 1,900 Mondale delegates chosen through May 8 in states where special delegate committees formed to elect Mondale candidates were operating.

On April 6, Hart complained to the Federal Election Commission that the Mondale campaign organization violated federal regulations by operating in tandem with the supposedly independent delegate committees to circumvent the federal spending ceiling, which Mondale's campaign is nearing. Mondale last month ordered the 120 committees disbanded and said that money spent by them would be counted against his spending limits while the FEC determines if the delegate committees were proper.

The Hart campaign, meanwhile, has continued to press the issue, urging Mondale to return the estimated $600,000 to $700,000 donated to the committees, mostly from political action committees. Early in the cam-

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Hart Hones Attack on Mondale's 'Tainted' Delegates

HART, From A1

paign. Mondale publicly ruled out acceptance of PAC funds by his national campaign organization.

Hart trails Mondale by 5 to 3 in the race for the 1,967 delegates necessary for nomination at the Democratic National Convention in July.

His campaign advisers have staked their final efforts to win the nomination on winning most of the remaining primaries and caucuses a majority of convention delegates to reject Mondale as their nominee on the grounds that he is incapable of defeating President Reagan.

Hart is unlikely to win enough delegates in the remaining caucus and primaries to overcome Mondale's lead.

But this year for the first time all 3,933 convention delegates will be free, in effect, to ignore the results of the primaries and caucuses and vote their consciences. Hart is hoping that in the contests still to come and in the last rounds of previously begun caucuses his late-developing momentum will sway sufficient uncommitted and uncommitted delegates and convert others so that he can block a Mondale first-ballot nomination.

Yesterday, Maxine Isaacs, Mondale's campaign press secretary, announced that the campaign would establish a $400,000 escrow account in "the next day or so" to begin repayment of money donated to the delegate committees by PACs.

"We established the escrow account in order to have the funds available for repayment at the earliest possible date and to show our seriousness about repaying the money . . . ," she said.

Hart campaign manager Oliver C. (Pudge) Heckel termed the Mondale move "an important first step" toward resolving the controversy.



Hart leaves a junk waste dump in New Jersey he promised to clean up if he is elected.

Hart refused yesterday to rule out a credentials challenge to the Mondale delegates in question, saying, "We'll wait and see."

Hart said yesterday that Mondale should ask the FEC to rule on the complaint as soon as possible and exercise his exclusive privilege as the respondent in the complaint to request the FEC to open its confidential deliberations.

Mondale campaign chairman James A. Johnson responded yesterday that officials of the Mondale organization were not "dragging their feet in any way" in the proceedings.

"I don't know what 'expedite' means in administrative law," Johnson said. The proceedings were not meant to be discussed publicly, he added.

He dismissed the idea of a "tainted" nomination as "absolute nonsense," "ridiculous" and "silly."

"This is not a new idea that they have," Johnson said. "This happens to every candidate that starts losing a lot of caucuses and primaries. This is a totally political effort by a candidate who is more than 900 delegates behind at the end of the primary-caucus process."

Hart raised the issue of a possible "tainted nomination" earlier this month in Texas, but yesterday's statements were among his strongest and most persistent.

"What happens," he said, "if, for example, the convention nominates Mr. Mondale and a week later or a month later, whenever, the FEC rules that half a million or a million dollars were illegally spent? A convention about to nominate, a ready-made issue is presented for the Republicans."

Some of the states in question were Mondale primary victories that helped him bounce back from a setback by Hart in the only caucuses and regular his front-runner status. They included Illinois (March 20), New York (April 3) and Pennsylvania (April 24).

"I think a very strong argument could be made that if the FEC will have [its record] that in effect] have attempted to throw states," Hart said yesterday.

Johnson dismissed that argument as over-reach.

"He [Hart] lost those states," he responded on those states and now somehow his effort to go back and say, 'I wish I hadn't lost those states and therefore the nomination is tainted' is ridiculous."

Hart said he didn't think the fight for the nomination was any more "unbalanced than usual" and that his differences with Mondale could be patched up. But his assessment of Mondale's battles swept in opposition during the 50-minute session.

"The record will show that the last six months I have gone around this country saying what a fine man Walter Mondale is at the very time that he was calling me a cold-hearted weirdo, questioning my stability, my character and so forth," he said.

"The whole thing at first puzzled me, then it disappointed me," Hart continued. "Eventually I became disturbed by it because I knew he didn't believe it."

Hart acknowledged making statements about Mondale, questioning the Carter administration's handling of the Iranian hostage situation and suggesting that Mondale is the tool of special interests.

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AMERICANS WITH HART, INC.

507 8th STREET, S.E.

WASHINGTON, D.C. 20003

May 2, 1984

Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20005

Re: Complaint of Americans With Hart, Inc. v. Mondale For President Committee, Inc., Filed April 6, 1984, MUR 1667

Dear Commissioners:

At various times recently, the Mondale campaign has successively announced (a) that it would stop, or had stopped, the flow of PAC money into the Mondale delegate committees, (b) that it would shut down the Mondale delegate committees altogether and (c) that it would return any contributions to Mondale delegate committees which would not have been acceptable if made directly to the Mondale campaign. None of these promises appears to have been satisfied. Nor are any of these announcements an appropriate substitute for legal action by the Commission with respect to the Mondale "delegate committee" scheme.

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Even though it was not later than early April that the Mondale campaign sought to stop the flow of PAC money into the delegate committees (see Exhibit H to our letter of April 27, 1984), such contributions were being banked by Mondale committees as recently as last Thursday, April 26, 1984. (Exhibit A accompanying this letter).

Even though the Mondale campaign announced on April 25, 1984, that it was issuing orders immediately to shut down the operation of the Mondale delegate committees (Exhibit H to our letter of April 27, 1984), newspaper reports indicate that delegate committees continue thereafter to operate actively in at least North Carolina, Maryland and the District of Columbia. (Exhibit A accompanying this letter; Exhibit K accompanying our letter of April 27, 1984).

The Mondale campaign promised on Friday, April 27, 1984, that it would refund all contributions made to Mondale delegate committees which would not have been acceptable if made to the Mondale campaign directly. (Exhibits A, B and C accompanying this letter). However,

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a news broadcast of the following evening (see transcript of NBC Nightly News on April 28, 1984, which is Exhibit D accompanying this letter) mentioned that aides to Mr. Mondale acknowledge that the campaign does not now have enough cash to refund immediately the more than $300,000 in questionable campaign contributions from labor. The Washington Post of May 2, 1984 (Exhibit E accompanying this letter), also reported that the Mondale campaign does not intend to make the refunds until after the last primary on June 5, 1984.

The Commission's responsibility to enforce the Federal Election Campaign Act remains notwithstanding that the Mondale campaign has bowed to public reaction and has anncunced that it will take steps to close down the Mondale delegate committees. The delegate committees still continue to function. Moreover, recent news reports indicate that the Mondale campaign has known since the earliest days when the "delegate committee" scheme was conceived that the scheme was of doubtful validity. The Washington Post of May 1, 1984, reported that "[i]n 1983, when they decided to use delegate committees, Mondale's advisors knew the technique was untested." (Exhibit F accompanying this

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letter) Yet the Mondale campaign avoided the advisory-opinion mechanism which was available to resolve legal questions and chose instead to proceed at its own risk. Its belated public-relations efforts should not deter the Commission in taking the steps which under the statute are appropriate for violations of this magnitude.

Respectfully submitted,

Americans With Hart, Inc.

by John M. Quinn
General Counsel

Complainant

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VERIFICATION

Washington)
) ss
District of Columbia)

John M. Quinn, being duly sworn, deposes and says that he is the general counsel of Americans With Hart, Inc., and is authorized on its behalf to submit the accompanying letter to the Federal Election Commission, that the exhibits included as Exhibits A, E and F are accurate copies of newspaper reports appearing in The Washington Post on the dates indicated, that Exhibit B is a true and accurate copy of a newspaper report appearing in The New York Times on the date indicated, that Exhibit C is a true and accurate copy of a newspaper report appearing in The Wall Street Journal on the date indicated, and that the transcript in Exhibit D is, to the best of his knowledge and belief, a true and accurate version of a report in the NBC Nightly News on April 28, 1984.

John M. Quinn

Subscribed and sworn to
before me this 25 day of
May, 1984.

Notary Public

My Commission Expires October 31, 1988

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of the Complaint of Americans With Hart, Inc. Complainant, -against- Mondale For President Committee, Inc. Respondent.	:	MUR 1667

EXHIBITS TO LETTER OF
AMERICANS WITH HART, INC.
DATED MAY 2, 1984

EXHIBIT A

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EXHIBIT A

THE WASHINGTON POST
SATURDAY, APRIL 28, 1984
P. 1, COLS. 2, 3, 4

(P. 1 OF 2)

Mondale Agrees to Return Disputed Funds

By David Hoffman and Dan Balz
Washington Post Staff Writers

LUBBOCK, Tex., April 27—Walter F. Mondale bowed today to criticism from Sen. Gary Hart (D-Colo.) and agreed to refund contributions made to the 1982 disputed delegate committees supporting his presidential campaign.

Mondale also said that the money spent by the committees would be counted against overall federal spending limits, further crimping his already strapped national campaign organization.

"In retrospect, I think these exemp-

[illegible] should have been avoided," Mondale said [illegible] in an interview here [illegible] afternoon here.

Only two days ago, when he asked the controversial delegate committees to dissolve, Mondale refused to refund the contributions they had received from [illegible] of organized labor.

But Hart said he resented himself last night after reports in The Washington Post stating that there appeared to be a striking pattern of coordination between the supposedly independent delegate committees and the national Mondale campaign, as well as between the committees.

Federal Election Commission records showed that the delegate committees were temporarily hiring staff from Mondale's national organization, were transferring money to other committees in states with crucial primaries and caucuses coming up, and were continuing to accept political action committee (PAC) contributions from organized labor and other special-interest groups even though Mondale had refused such donations for

See MONDALE, A21, Col. 1

P1, K 2-3, 4

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EXHIBIT A

THE WASHINGTON POST
SATURDAY, APRIL 28, 1984
P. A13, COLS. 1, 2, 3

Mondale to Return Disputed Funds

MONDALE, From A1

his organization, Mondale for President Inc.

Hart told reporters in Nashville, where he was campaigning, that he was pleased to hear of Mondale's decision to return the disputed contributions. But he added:

"Whether he would have made it on his own without public pressure, without the scrutiny that has gone on in the last couple of weeks, is a question that remains open."

Hart asserted that Mondale's primary and caucus victories in Illinois, New York, Pennsylvania and Wisconsin are now "tainted" by the fact that his campaign relied heavily on financing through delegate committees in those states.

The Colorado senator has filed a complaint with the FEC questioning the autonomy of the delegate committees and the legality of the big contributions they received from PACs and individuals who had also contributed to the national Mondale campaign. Mondale's legal response is due Monday and his aides said that this determined the timing of his announcement today.

Hart said he hoped Mondale's campaign would join his in seeking an expedited ruling from the FEC. He also called on Mondale to provide a full accounting of how much money flowed into the delegate committees and the sources of those funds. Many of them have yet to submit their reports to the FEC.

Mondale said his campaign would "voluntarily take the position, for purposes of resolving this matter," that the delegate committees will be "treated as having been affiliated with our campaign."

He said his lawyers had informed him that the committees were "defensible" if he wanted to fight Hart's complaint before the FEC, but he decided "that's not enough."

Contributions to the 129 committees could total $700,000. Of that, more than $300,000 came from PACs and an undetermined amount from individuals who also contributed to Mondale for President Inc. The refunds consequently will be in two categories.

First, Mondale give back all the PAC contributions, because he had vowed that he would not accept them for his national campaign. Second, he will return donations to delegate committees that exceed the $1,000 limit on individual donations to a single campaign. Thus, a donor who gave $1,000 to Mondale's national committee and $1,000 to a delegate committee would get a $1,000 refund.

Mondale's decision will hurt financially. Most of the delegate committee money has been spent and he will have to make the reimbursements out of his treasury—in many cases for expenses that Mondale strategists would have foregone, such as palm cards and yard signs for a labor delegate for Mondale in a race against a non-labor delegate for him.

Mondale's move will also put him as much as $700,000 closer to the $20.2 million federal spending limit for the pre-convention phase of the campaign. He will have that much less to spend in the fight against Hart and, in addition, will have to assume some expenses that delegate committees might have covered, especially in the expensive California primary June 5.

Mondale officials estimate that they have already used up about $15 million of the $20.2 million maximum. Mondale said he was confident that his campaign was in no danger of hitting the limit, "but even if it were, I would have" returned the donations.

The key issue in the dispute, campaign officials said, was the question of how autonomous the committees had been. The officials said Mondale concluded after reading reports in The Post that it wasn't worth the fight even if his lawyers thought he could win.

"I'm not in this to win a lawsuit. I'm in this to win the presidency," Mondale told his staff aides Thursday night during a four-hour meeting, according to one aide who was there.

Mondale advisers said that treating the delegate committees as "affiliated" with the national campaign was a necessary step before the campaign could return the PAC money.

They also acknowledged that this will have put the Mondale campaign beyond the permissible spending limit in the New Hampshire primary campaign and perhaps in the Maine caucuses. Hart won both of those states.

The termination papers of the first of the 129 committees to disband, the 17th District Mondale Delegate Committee of Rock Island, Ill., arrived at the FEC today. The group said it had returned the more than $2,500 surplus it had had on hand, sending back $1,042 to the United Auto Workers and $1,563 to the AFL-CIO's Committee on Political Education.

Other committees, however, evidently had no plans to shut down. Jim Margolis, Mondale's North Carolina coordinator, said officials of the only such committee in that state, based in Greensboro, refused his plans to close down at a meeting Thursday.

Another committee that has no intention of shutting down is the Mondale Delegates-D.C. Committee, which is moving ahead with its plans to get out the vote in Tuesday's primary in the District of Columbia. Its treasurer, Washington Teachers Union president William H. Simons, said yesterday morning that he had just banked a chunk of contributions the day before, including an April 9 contribution of $680 from the Operating Engineers union.

The D.C. Committee will spend about $35,000 before it is done, Simons estimated. Some contributions, he said, were still trickling in.

Staff writers George Lardner Jr. and Martin Schram contributed to this report.

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EXHIBIT B

EXHIBIT B

THE NEW YORK TIMES
SATURDAY, APRIL 28, 1984
P. 1, COL. 1

MONDALE DECIDES TO RETURN FUNDS TO LABOR GROUPS

BOWS TO RIVALS' CRITICISM

Says the Spending of Delegate Units Will Be Counted as His Own Under U.S. Lid

By RICHARD WEINRAUB
Special to The New York Times

LUBBOCK, Tex., April 27 — Walter F. Mondale, bowing to criticism from his rivals for the Democratic Presidential nomination, announced today that he would return about $800,000 contributed to committees supporting delegates who back his candidacy.

Mr. Mondale acted two days after announcing that he would terminate all such committees but would not return the money they had raised. On Thursday he had told reporters that it was all right for the groups to keep the money, which came largely from organized labor.

Mr. Mondale said that, because of questions raised about the finances of the delegate committees, the money the groups had spent in behalf of the Mondale candidacy would be counted toward his $20.1 million Federal limit on spending in the nomination battle.

Questions About Independence

The groups were set up to be independent of the Mondale campaign as it began hitting a financial squeeze in January that threatened to push the campaign up to the Federal spending limit in the spring, at a time of critical primaries and caucuses. Senator Gary Hart has said the committees were aligned with the Mondale campaign and thus illegal.

In Nashville, Senator Hart said he was pleased with Mr. Mondale's decision but that many questions still remained about the former Vice President's victories in some states. In Louisiana, the Rev. Jesse Jackson, also praised the decision.

In his unexpected announcement today, Mr. Mondale said that because Federal election laws were "not well-defined" and were "ambiguous," he wanted "to resolve this matter and remove any lingering doubts" about the financing of his campaign.

"I believe that public servants, in-

Continued on Page 8, Column 3

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EXHIBIT B

THE NEW YORK TIMES
SATURDAY, APRIL 28, 1984
P. 8, COLS. 3, 4, 5

(P. 2 OF 2)

Mondale to Return PAC Money of Delegate Units

Continued From Page 1

cluding myself, have a duty not just to avoid impropriation but to avoid the appearance of impropriety," Mr. Mondale told a news conference here after a picnic at the Lubbock Civic Center.

Mr. Mondale added, "The blurred standards governing delegate committees lead me to direct my campaign to take additional steps."

He said his campaign would inform the Federal Election Commission that "we will refund all contributions made to delegate committees which would not have been acceptable if made to the campaign directly."

Maxine Isaacs, Mr. Mondale's press secretary in Washington, said in a telephone interview that the $900,000 estimate of what would be returned included contributions from political action committees of organized labor, as well as any contributions in excess of $1,000 made by individuals.

Mr. Mondale and Mr. Hart have both vowed not to accept PAC money. A contested Federal law bars individuals from giving more than $1,000 to a Presidential campaign, and PAC's from giving more than $5,000. But some contributors are giving the maximum amount to each of many states' delegate committees. Mondale aides said they did not have an estimate on the total of any such contributions.

A Sudden Change of Mind

On Wednesday, Mr. Mondale ordered the termination of all 127 delegate committees. This prompted Senator Hart to say Mr. Mondale should "take one simple cleansing step" and return the labor money gathered by the committees. Mr. Jackson made similar comments.

Mr. Hart, in a complaint to the Federal Election Commission, had said the committees were set up illegally by the Mondale organization to avoid campaign laws and to pour "hundreds of thousands of political action committee" money into the campaign through the supposedly independent grass-roots delegate groups.

Although there had been growing evidence linking the Mondale organization to the committees, Mr. Mondale had insisted in recent days that the committees were "operating on their own" and that his campaign had not "been involved with them."

Mr. Mondale said his lawyers told him that the committees were "legally defensible." But he said, "It's far more important to me to make clear my deep commitment to ethical performance than to have what ethical advantage that money difference will make."

Mr. Mondale said his delegate committees would lose their independent status and be directly "affiliated with our campaign."

"We will refund all contributions made to delegate committees which would not have been acceptable if made to the campaign directly, including PAC contributions and individual contributions that would exceed campaign limits," Mr. Mondale said, referring to the $1,000 individual limit.

He added that, with the committees placed under the wing of the Mondale organization, "we will count all the expenditures of all delegate committees against the overall spending limits of the campaign."

Mondale aides said the delegate committees had raised an estimated $900,000 and had spent most of that.

Miss Isaacs, the press secretary, said contributions of about $900,000 were not being returned because they had been deemed legal and in compliance with Federal election laws.

She said the Mondale campaign had so far spent about $14.5 million of the $20.3 million campaign limit. Mondale aides said this did not include the money spent by the delegate groups.

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EXHIBIT C

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EXHIBIT C

THE WALL STREET JOURNAL
MONDAY, APRIL 30, 1984
P. 62, COL. 1

Mondale Spending Exceeded Ceiling In New Hampshire

By Brooks Jackson
Staff Reporter of The Wall Street Journal

WASHINGTON—Walter Mondale's campaign spent about $200,000 more than legally allowed in the New Hampshire primary, including a blitz by two "delegate committees."

Mondale aides once boasted that they were too careful and businesslike to exceed the legal federal ceiling of $404,000 in the Feb. 28 contest. But reports filed by the two committees—weeks late—show they poured $582,485 into the state during the final two weeks of the campaign, in addition to the nearly $400,000 the main Mondale campaign says it spent there.

Spending by the delegate committees went to pay dozens of campaign workers and for rental cars, hotel rooms, telephones and air travel.

Funds for the supposedly grass-roots committees included $65,000 from political action committees run by national labor unions, most of them based in Washington. Tens of thousands more came from wealthy Mondale backers in New York, New Jersey, Illinois, Florida and California. Hardly any money was raised in New Hampshire itself.

The pattern suggests that the two New Hampshire committees were used as part of Mr. Mondale's original strategy of scoring early knockouts of his rivals for the Democratic presidential nomination. Money began arriving as early as Feb. 9, and the two committees held their first payday on Feb. 13. As it turns out, however, Mr. Mondale was beaten in New Hampshire by Sen. Gary Hart.

Mr. Mondale, after being criticized for skirting federal spending and contribution limits and for breaking a promise against accepting donations from political-action committees, finally agreed last week to return contested donations and to count outlays by his delegate committees—numbering more than 120 nationwide—against his campaign-spending limits.

In addition, the Mondale campaign could face a stiff fine for overspending in New Hampshire. In such cases, the election commission generally seeks a fine equal to the amount of spending above the legal ceiling.

Mr. Mondale said formation of the delegate committees, numbering more than 120 nationwide, was a mistake. He promised to return all PAC gifts, plus any contributions by individuals exceeding the $1,000 limit on donations given directly to the campaign.

Nearly $386,000 in PAC money has come to light so far, including nearly $73,000 from the American Federation of State, County and Municipal Employees, $54,200 from the American Federation of Teachers, $36,000 from the United Auto Workers, $30,000 from the United Mine Workers, $29,500 from the Communications Workers of America, and $20,200 from the AFL-CIO.

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EXHIBIT D

RADIO TV REPORTS, INC.
4701 WILLARD AVENUE, CHEVY CHASE, MARYLAND 20815 (301) 656-4068

FOR ICANS WITH HART, INC.

PROGRAM NBC Nightly News STATION WRC TV
NBC Network

DATE April 28, 1984 6:30 PM CITY Washington, DC

SUBJECT PAC Money

CONNIE CHUNG: Gary Hart is not letting up on Walter Mondale for allowing his delegate committees to accept Political Action Committee money from labor unions, even though Mondale has promised to give the money back. Today Hart questioned the validity of Mondale's victories in three important states, victories Hart says are tainted by the money.

With more on the issue that won't go away, Lisa Myers on the Mondale campaign.

LISA MYERS: While Mondale tried to focus on more pleasant matters, aides acknowledged that the campaign does not now have enough cash to immediately refund the more than $300,000 in questionable campaign contributions from labor. They said the money will have to be raised and then returned under procedures worked out with the Federal Election Commission.

Mondale continued to maintain he's done nothing illegal nor improper.

WALTER MONDALE: I believe, my lawyers believe that everything we've done is legally defensible. That's not enough. So I felt that we had to do what we did.

MYERS: Gary Hart charged that while Mondale may be giving back the labor money, he isn't giving back all the unfair help it provided in crucial primaries in Illinois, New York and Pennsylvania.

GARY HART: Whether he ought to give back the delegates is something perhaps the party wants to consider.

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MYERS: The delegate committees helped Mondale through the darkest days of the campaign, fueled by hundreds of thousands of dollars from labor unions, contributions which would have been illegal if made directly to the Mondale campaign. The committees paid for headquarters, campaign workers, signs, even balloons for Mondale rallies. Earlier this week Mondale still was defending the operation.

MONDALE: ...is perfectly legal, perfectly proper, and authorized by the Federal Election Commission. So I have no apologies to make about that at all.

MYERS: But as more details became public, Mondale was buffeted by charges of potential illegality. He began to back pedal. Wednesday:

MONDALE: I am asking that these committees be terminated, period. Ended.

MYERS: Thursday he was asked whether he would give back the money.

MONDALE: Of course not. It's -- first of all, I didn't get the money. It went to the autonomous committees.

MYERS: But Friday:

MONDALE: We will refund all contributions made to these committees which would not have been acceptable if made to the campaign directly.

MYERS: Although the Federal Election Commission still could impose penalties, Mondale's advisors pronounced this controversy over. But some aides worry that it has tarnished Mondale's image and rekindled concerns about his relationship with organized labor.

Lisa Myers, NBC News, with the Mondale campaign in New Orleans.

CHUNG: Jesse Jackson today applauded Mondale's decision to return the contributions, but Jackson demanded that Mondale give him the delegates Jackson says were bought by that money.

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EXHIBIT E

EXHIBIT E

THE WASHINGTON POST
WEDNESDAY, MAY 2, 1984
P. A13, COL. 1, 2, 3

Mondale Is in Good Financial Shape

By Thomas B. Edsall
Washington Post Staff Writer

Despite Walter F. Mondale's decision to pay back about $350,000 raised by his controversial delegate-candidate committees, he will be able to outspend his rivals in the closing weeks of the contest for the Democratic presidential nomination, according to campaign officials.

Mondale has been taking in about $300,000 a week, finance director Tim Finchem said yesterday. That healthy cash flow, combined with federal matching grants, will enable the campaign to spend from $2.5 million to $3 million from the start of this month through the major primaries on June 5, which include California and New Jersey, he said.

Conversely, fund-raising for Sen. Gary Hart (D-Colo.) has taken a nose dive since his defeat March 20 in the Illinois primary.

Oliver (Pudge) Henkel, Hart's campaign manager, said contributions have dropped from over $100,000 a day, or $700,000 to $850,000 a week, to under $40,000 a day.

Jesse L. Jackson has been running a shoestring campaign, spending no money on television advertising. By the end of March, he had spent $2.1 million, compared with $7.1 million by Hart and $13.3 million by Mondale.

In early March, Mondale not only was reeling from losses to Hart in New England but also was facing the prospect of being outspent by Hart during the rest of the campaign. Mondale spent huge sums in 1983 and in the first two months of 1984, while Hart had spent next to nothing during that period. With a $30.2 million federal spending limit, Hart had more than enough running room, and donations were were pouring in. But Mondale was in danger of bumping into the federal limit in the final weeks of the campaign.

He Might Outspend Foes in Final Weeks

In addition, Mondale last week renounced the use of "delegate committees" that had spent money on his behalf without it counting against his federal spending limit. He promised to pay back all political action committee (PAC) donations made to the committees and all individual contributions exceeding $1,000—at a cost of $250,000 to $350,000 to his campaign.

He also agreed to count against his spending limit the $450,000 to $500,000 these committees spent. The decision increased the danger that Mondale would be massively outspent in the closing weeks of the campaign.

But the sharp decline in the volume of contributions to Hart has ended that danger, at least for the moment.

Finchem said that, as of the end of April, the Mondale campaign had spent about $15 million against the $30.2 million federal cap. When the money spent by delegate committees is added to the total, Mondale will have about $4.6 million left to carry the campaign through the convention in July.

"We can get by on what we have at least to June 5 [the final major primary day] even if we have to have an all-volunteer convention operation," Finchem said.

Hart seems to be in no danger of hitting the federal spending limit since he remains about $10 million under it.

And Henkel said Hart's reduced cash flow means Mondale probably will outspend him through June 5.

In addition, Finchem said Mondale's repayment of delegate-committee money probably will not be made until after the California and New Jersey primaries, further lessening his cash-flow problems.

While Mondale plans to pay back PAC contributions and large individual contributions made to delegate committees, he has a much smaller debt to pay than Hart.

At the end of March, Hart reported that he owed $4.2 million, and Henkel said the current debt is about the same. Mondale reported debts at the end of March of $1.9 million, less than half of Hart's.

Henkel said the Hart campaign will not have to start repaying loans until after the June 5 primaries, so the debt will not interfere with spending during those potentially crucial contests.

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EXHIBIT F

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Mondale Slow to Realize Political Danger Delegate Panels Posed

By David Hoffman
Washington Post Staff Writer

On Easter, Walter F. Mondale was concluding a three-day campaign break at his Cleveland Park home. He turned on the television at midday to watch Sen. Gary Hart (D-Colo.), his chief rival for the Democratic presidential nomination, on "Meet the Press."

What he saw was Hart launching a vigorous new attack on the Mondale delegate-candidate election committees that had raised hundreds of thousands of dollars from organized labor. Hart described it as "back-door" fund-raising that may be illegal.

It took five days for Mondale to cope with the charge. He did it fitfully, first saying the committees were legally autonomous, then saying he thought the fund-raising had been stopped, then asking his delegates to disband the committees and finally promising to give most of the money back.

Interviews with his campaign staff indicate that Mondale was, at the outset, slow to recognize the political damage the episode could cause and that he initially left decisions on the issue to subordinates, but that when he did become engaged he plunged into the details of the problem.

The controversy also was sensitive for Mondale because it appeared to be a test of his ability to control his supporters in organized labor. Many delegate committees were composed of union members who received union political action committee (PAC) funds and spent them on Mondale's behalf.

Moreover, Mondale has accused President Reagan of paying too little attention to malfeasance and the appearance of impropriety in his administration.

The delegate committees were supposed to be locally autonomous efforts by people trying to get elected as Mondale delegates to the Democratic national convention. They could raise and spend money independent of Mondale's $20.2 million legal federal spending limit.

In 1983, when they decided to use delegate committees, Mondale's advisers knew the technique was untested.

"This was a way of adding to the overall steam" of Mondale's push for the nomination, said a top campaign adviser. "We knew all along that we were breaking some new ground. We knew all along this was going to be unfamiliar territory to the press and the political community."

Mondale, like Hart, had made a point of refusing to accept special-interest PAC money for his national organization. But his delegate groups were accepting such contributions.

Mondale and his campaign advisers said they didn't like it and sought to discourage the practice, but they also contended that the delegate committees were autonomous and, thus, beyond the control of the national campaign.

By the New York primary, which Mondale won, his advisers, including campaign manager James Johnson, thought that they had stopped most of the PAC money and that this would end the controversy, campaign sources said.

But Hart revived it in his television appearance on Easter. He sought to make an issue of the delegate groups, questioning their legality on grounds that they were not acting independently of the national Mondale campaign.

If he sensed a problem looming, Mondale gave no indication of it that day.

His first conversation with Johnson about it was at 8:30 the next morning. According to an official familiar with their conversation, Mondale said he thought Hart's charge was potentially serious; Johnson countered that making it in New York had failed to help Hart there. Johnson also said Mondale's campaign had been "shoveboard" because the delegate committees were not a secret and were legal.

They ended the conversation agreeing to "monitor it closely" and "wait and see" what kind of issue it became, the official said.

Two hours later, Mondale arrived at The Washington Post for an interview with reporters and editors. Questioned about Hart's charges, Mondale said, "I think he's trying to make an issue where it doesn't exist."

Mondale said Federal Election Commission rules state "in clear writing" that "these autonomous committees are legal and to suggest otherwise must be based on the hope that no one would read the FEC regs which promote them . . . ."

He also said repeatedly as he campaigned later that day that PAC money had stopped flowing to the delegate committees and that he had wanted it stopped.

It was Mondale's first day back on the campaign trail after a break following Pennsylvania's primary. He was engrossed in a major arms-control speech he was to deliver

News Analysis

the next morning. The speech was intended to break new ground in Mondale's case against Reagan.

At this point, Mondale regarded the delegate controversy as more of a technical one over rules than a political one that could challenge his credibility, campaign officials said.

By all accounts, the first clear danger signal Mondale received was Tuesday afternoon following the speech. At a Nashville news conference, he was pelted with unanticipated questions about the delegate committees rather than queries about the arms-control address and his proposal for preventing war in space.

In his suite at the Hyatt Regency in Nashville, according to a campaign official, an exasperated Mondale demanded to know: "What the hell is going on?"

Mondale added, "This is a lot bigger question than we thought 30 hours ago. We better move quickly to terminate these committees if this is going to become an issue," according to another official.

THE WASHINGTON POST
TUESDAY, MAY 1, 1984
P. A6, COLS. 1, 2, 3

(P. 1 OF 2)

P. 1 OF 2

THE WASHINGTON POST
TUESDAY, MAY 1, 1984
P. A6, COLS. 4 & 5

(P. 2 OF 2)

"MONDALE SLOW TO REALIZE....."

Late Tuesday night, Mondale asked aides to find a way to get the delegate committees disbanded. They suggested a series of telegrams, which he approved. Mondale also suggested that Johnson look into the issue further in case stronger action might be necessary.

At this point, Mondale and his staff calculated they had gone far enough to quell the controversy, officials said. When asked at a news conference whether he would give the money back, Mondale said that such action wasn't "appropriate."

"That was a remedy much more extreme than the situation required," recalled the senior campaign official. Mondale thought that giving the money back would "potentially imply guilt that he did not feel was warranted," the official added.

Wednesday Mondale continued to defend the committees as "legal" and "permissible." That day there were news reports questioning the autonomy of the committees and whether they were coordinating activities with the national Mondale organization.

While Mondale's action seemed to relieve the pressure on his campaign, the candidate did not drop the issue. He wondered aloud whether he should take further steps.

Although his lawyers said he was on firm ground, Mondale began to reach the conclusion that there wasn't time to make a legal argument in a highly charged political atmosphere and that he needed to demonstrate that his campaign was above even the appearance of impropriety.

This conclusion apparently was enhanced by a package hand-carried Wednesday night from Mondale's Washington headquarters to his hotel suite in Fort Worth. Inside was a sheaf of legal documents and FEC regulations on the issue.

"He looked at the stuff and said, 'This is a swamp,'" according to the senior campaign official.

Mondale read the fine print of the regulations on the question of delegate committees' autonomy. He concluded that the rules were vague and that he needed to take stronger action even though the issue seemed to be subsiding in the news media in states where he was campaigning.

Early in the week, Mondale had accepted his lawyers' judgment that the delegate committees were legal and had taken a wait-and-see attitude on the political consequences.

By late in the week, one official said, "He didn't need to wait one more minute."

After reading the legal material and the FEC rules, "he knew for sure it wasn't an open-and-shut case," the official added.

Hart had filed an FEC complaint; Mondale's response was due the next week.

Moreover, Mondale was scheduled to give a Law Day speech in which he wanted to emphasize respect for the law and accuse Reagan of playing fast and loose with ethical standards. He needed to come to grips with Hart's taunting demand, "Give the money back, Walter."

His staff's mission was to eliminate the appearance of impropriety. Top aides decided the way to do that was by accepting affiliation with the disputed delegate committees, counting the committees' spending toward the overall federal limit and refunding about $300,000 in donations.

On a chilly and windy night in El Paso, Mondale agreed to these steps, but it was not an easy decision. His staff warned that it would be expensive, forcing Mondale's strapped campaign closer to the federal spending ceiling.

They said he could win the FEC case against Hart. But Mondale said it wasn't worth it, that he wasn't running for president to win a lawsuit.

Finally, on Friday morning, Mondale announced his decision. In retrospect, several campaign officials said, it was a decision he could have announced four or five days earlier.

Campaign manager Johnson said that, looking back, the "the biggest mistake of all was creating the delegate committees in the first place."

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AMERICANS WITH HART, INC.

507 8th STREET, S.E.

WASHINGTON, D.C. 20003

April 27, 1984

Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20005

Re: Complaint of Americans With Hart, Inc.
v. Mondale For President Committee, Inc.,
Filed April 6, 1984, MUR 1667

Dear Commissioners:

We write to press once again for prompt Commission action on what is now being widely recognized as a massive undermining of the integrity of the federal election laws -- the Mondale "delegate committee" scheme.

Since our previous letter supplementing the Complaint in this matter on April 18, 1984, there is substantial public evidence in Mondale campaign solicitations, press reports and filings with the Commission that the Mondale "delegate committees" have proliferated across the nation with little pretense of "independence" from the Mondale campaign or lack of affiliation with each other. */ Renewed claims by the Mondale campaign of its intention to disband the delegate committees -- despite repeated words of encouragement from

*/ As noted by The Washington Post of April 26, 1984, (Exhibit A accompanying this letter), one such committee alone was a "supposedly independent grass-roots campaign effort . . . . [which] had grown into an impressive arm of the Mondale campaign."

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its top officials -- do not negate the need for effective and timely Commission intervention. Silence on the part of the Commission will undermine public confidence in it and the laws it enforces.

(1) Further Reported Details of the Kamarck Memorandum of January 12, 1984, Are Additional Evidence That the Delegate Committees Are Not Acting "Independently" -- As previously noted in our letter to the Commission of April 18, 1984 (pp. 4-5), the memorandum of January 12, 1984, by the Mondale campaign's Chief Delegate Coordinator, Ms. Elaine Kamarck, urged the formation of Mondale delegate committees, and advised how delegates could set up such committees. The press report of that memorandum also established that Ms. Kamarck's memorandum had urged solicitation of funds and said that, as far as spending on permitted campaign materials was concerned, "there are no requirements as to the amount of space which must be devoted to the delegate-candidates versus the amount of space devoted to Mondale."

Further reports in the press indicate that Ms. Kamarck told the delegates that "the campaign will assist each slate of delegates in forming a committee if they so desire." (Emphasis added.) (Exhibit B accompanying this letter) According to other press reports (Exhibit C accompanying

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this letter), the Kamarck memorandum also enclosed still another memorandum of instructions and advised delegates on how to raise and spend money; it continued: "'Please follow the instructions on the enclosed memorandum,'" she said, "'and when in doubt do not hesitate to call the Office of the Legal Counsel here at campaign headquarters.'" (Emphasis added.) In the light of this information, it strains credulity for the Mondale campaign to maintain that the delegate committees were set up "independently."

(2) Solicitations in the District of Columbia Show the Lack of Independence of the Mondale Delegate Committees and the True Purposes of the Scheme (i.e., To Avoid The Spending Ceilings and to Finance Mondale Campaign Operations in the Field) -- By letter dated April 5, 1984 (Exhibit D accompanying this letter), the chairperson of an organization calling itself "Mondale Delegates -- D.C. Committee" wrote to supporters of Mr. Mondale, saying that she was asking for "assistance in the Mondale effort in the District of Columbia." The chairperson of the committee continued by stating that the D.C. delegate committee was "the principal finance committee for Fritz Mondale . . . in the District of Columbia." The letter also noted that the D.C. delegate committee had been organized with "the assistance of the Mondale National Committee office."

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A second (undated) letter of "DC Dems for Mondale", which was "Paid For By Mondale Delegates -- DC" (Exhibit E accompanying this letter) also demonstrates the coordination between the national Mondale campaign and the delegate committees. The letter says:

> ". . . [N]ow the national campaign is bumping against its legal spending limits and must reserve remaining funds for expensive media costs in states like Texas and California. Local-level Mondale delegate election committees are now expected to finance voter outreach efforts the national campaign cannot." (Emphasis added.)

(3) There is Additional Persuasive Evidence That the Mondale Delegate Committees are Acting in Concert -- All of the Mondale delegate committees which were in operation prior to March 31, 1984, were required by law to file a quarterly report of their receipts and expenditures not later than April 16, 1984. Yet as of April 25, 1984, many Mondale delegate committees had not filed a report for the first quarter. There may be still others which have not even filed organizational reports.

Still, there is enough information in the incomplete reports to bring to the Commission's attention a number of additional facts demonstrating the total lack of "independence" of the Mondale delegates and showing that these committees have acted in concert with one another and with the national Mondale campaign.

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As reported in The Wall Street Journal of April 20, 1984 (Exhibit F accompanying this letter), "as delegate committees in one state finish their work, they often roll any surplus funds forward to another delegate committee in another state where a presidential nomination is coming up." This point -- and the obvious coordination among these committees -- is vividly illustrated by the quarterly reports, both filed late on April 24, 1984, of two Mondale committees in New Hampshire. Both of these committees had excess cash after the primary in New Hampshire was finished on February 28, 1984. The following chart shows disbursements to other Mondale delegate committees -- from New Hampshire alone -- after that date.

March 2	$2,750 to Florida by 2nd N.H.
6	1,500 to Florida by 1st N.H.
6	1,600 to Florida by 1st N.H.
6	350 to Florida by 1st N.H.
9	1,000 to Florida by 2nd N.H.
9 [?]	1,250 to Florida by 2nd N.H.
10	2,400 to Florida by 2nd N.H.
10	2,000 to Florida by 2nd N.H.
13	Florida primary
13	4,000 to Illinois [?] by 1st N.H.
15	1,500 to Illinois by 2nd N.H.
20	2,000 to Illinois by 1st N.H.
20	Illinois primary
20	1,500 to Pennsylvania by 2nd N.H.
31	1,000 to Pennsylvania by 1st N.H.
(April 10	Pennsylvania primary)

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Another illustration of this "rolling forward" of funds is evidenced by the transfer from the Kentucky Mondale committee to the Montana Mondale committee following the Kentucky caucuses. After the Montana election was over, the Montana committee then sent $300 to the North Dakota Delegates for Mondale Committee. Still another illustration is that the Wisconsin At-Large Delegate Committee on March 22, 1984, after the Michigan caucuses and before the Wisconsin primary, received $3,600 from the Sixth District Mondale Committee in Michigan. Similarly, it was just after the Illinois primary that the 22nd District Mondale Committee in Illinois sent $1,000 to the Kansas Mondale At-Large Committee.

There is also substantial evidence that the operations of the Mondale delegate committees within particular states are being coordinated. One illustration is in Pennsylvania, where the Pennsylvania At-Large Delegate Committee distributed $8,500 in $1,000 and $500 amounts to seven different delegate committees for Mondale within Pennsylvania. Similar transfers among committees within states are evident from reports filed on behalf of Mondale delgate committees in Illinois and Florida.

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Even though press inquiries to those involved have produced what appear to be accurately described as "amnesia and ambiguity" (Exhibit A accompanying this memorandum), the reported facts are clear. There is a distinct pattern of coordination by the Mondale delegate committees (a) from state to state and (b) within particular states. */ The facts also strongly suggest a nationally coordinated effort which could only have occurred through the national Mondale campaign.

(4) Reports to the Commission Show That the Mondale Delegate Committees Are Not Confining Themselves to Expenditures for Campaign Materials Used for "Volunteer Activities" -- We noted in our Complaint that there are special provisions available for expenditures by individual delegates for certain campaign materials (such as pins, bumper stickers, handbills, brochures, posters and yard signs), provided that such materials are used in connection with "volunteer activities". 11 C.F.R. § 110.14(d)(2)(i)(A). This exception is not available to delegate committees. 11 C.F.R. § 110.14(e). More than that, the reports on file with the Commission show that even the Mondale delegate committees are not limiting their expenditures to "campaign materials" used for "volunteer activities."

*/ Other evidence of coordination disclosed by Commission reports, including non-coincidental identities and similarities of dates, handwriting, typing and other matters, are outlined in an article in The Washington Post of April 25, 1984 (Exhibit G accompanying this letter).

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Specifically, the reports show a consistent pattern of payments for "salaries," "per diem" or "subsistence" payments for employees. Such expenditures obviously are not for "campaign materials." Nor are any such materials being used in "volunteer activities," since volunteer work is not paid employment.

One striking example of extensive payroll expenses are those of the Wisconsin At-Large Committee, which employed 13 individuals, each one of which had an address outside of the state of Wisconsin. The Fifth Congressional District Mondale Committee in Wisconsin showed seven out-of-state employees. These two committees are the only Wisconsin delegate committees to have reported as of April 25, 1984.

The New Hampshire, Illinois, New York, Pennsylvania and Florida committees also show numerous instances of payments for employment expenses for persons who, in those instances when addresses are identified, appear to be virtually all out-of-state workers. */ Two employees of the 22nd Congressional District Delegates for Mondale in Illinois gave their addresses as "c/o Mondale For President, 2201 Wisconsin Ave., N.W., Washington, D.C. 20007."

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*/ The Mondale delegate committees are not limiting themselves to expenditures for "campaign materials" in other respects. Wholly aside from the salaries, the report from the 4th District Mondale Committee in Illinois, for example, shows expenditures for "media."

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Indeed, many of the paid employees of the Mondale delegate committees are former Mondale employees apparently laid off by the Mondale campaign when it had difficulty with its own fund-raising. The Wall Street Journal on April 20, 1984 (Exhibit F accompanying this letter), reported:

> ". . .[M]any campaign workers have been dropped from the payroll of the central Mondale committee only to reappear on the payrolls of the supposedly grass-roots committees.
>
> "Before the Wisconsin caucuses on April 7, for example, a Mondale delegate committee in Madison had 13 people on salary. All had been on the payroll of the central Mondale campaign committee in February.
>
> * * *
>
> ". . .[M]ore than 30 former Mondale campaign employees have switched to the payrolls of Mondale delegate committees." (Emphasis added.)

(5) Violations of Spending Limitations in New Hampshire May Have Occurred -- We are advised that the Mondale campaign spent $384,000 in New Hampshire, just $20,000 short of the $404,000 limit for the state. Reports of two Mondale New Hampshire committees on file as of April 25, 1984, indicate that those two committees spent an additional $102,000.

(6) The Activities of Mondale Delegate Committees Have Not Been Stopped -- Mr. Mondale is reported in The Washington Post of April 24, 1984 (Exhibit C accompanying

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this letter) to have said that "almost all" contributions to Mondale delegate committees from special-interest groups had ceased. However, even though Mr. Mondale is alleged to have told labor officials and the delegate committees to stop the flow of PAC money to the committees in early April (see Exhibit H accompanying this letter), PAC money was still flowing into the Mondale delegate committees as recently as Monday, April 23. (See Exhibit I accompanying this letter).

On April 25, 1984, Mr. Mondale announced that he had ordered the delegate committees to shut down. (Exhibits H, I and J accompanying this letter) However, there is no reason to think that this announcement will end the matter any more than Mr. Mondale's announcement earlier in April stopped the flow of PAC money into the committees. Moreover, individual delegate committees are continuing to spring up. According to an article in The Washington Post on April 24, 1984 (Exhibit C accompanying this letter), records of the Federal Election Commission show that the number of Mondale delegate committees that had filed with the FEC had swelled from 87 earlier in April to 122 by the evening of April 23, 1984. Moreover, according to an article in The Washington Post of April 27, 1984 (Exhibit K accompanying this letter),

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delegate committees in at least two jurisdictions, Maryland and the District of Columbia, show no sign of shutting down.

When told of the growing number of Mondale delegate committees shown in the FEC's files, Mr. Mondale's campaign chairman earlier this week professed to be "surprised." (Exhibit C accompanying this letter). However, the fact remains that the Mondale delegate committees were instituted, fostered, encouraged, advised and supported by the Mondale campaign.

The Mondale campaign cannot insulate itself from the consequences of its own acts by professing "surprise" that its own program was working. Nor should the Commission hesitate to take action simply because the Mondale campaign has announced that it will stop the activities of the delegate committees which it fostered and encouraged to proliferate. It is up to the Commission to take legal action which will bring a halt to the improper activities of these committees in support of the Mondale candidacy. */

*/ Moreover, there is still the question about past violations. The Mondale delegate committees have had a heavy influence in the states where they have functioned. According to The New York Times of April 26, 1984 (Exhibit B accompanying this letter), for example, Mondale delegate committees in Pennsylvania spent $80,000 to $100,000, more than double the $39,223 spent by the Mondale campaign itself in that state.

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We urge the Commission to act <u>now</u>, before further damage is done to the integrity of the political process and to the confidence of the public in the Commission's ability to enforce the law.

Respectfully submitted,

Americans With Hart, Inc.

by _____
John M. Quinn
General Counsel

Complainant

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VERIFICATION

Washington)
) ss
District of Columbia)

John M. Quinn, being duly sworn, deposes and says that he is the general counsel of Americans With Hart, Inc., and is authorized on its behalf to submit the accompanying letter to the Federal Election Commission, that the exhibits included as Exhibits A, C, G, H and K are accurate copies of newspaper reports appearing in The Washington Post on the dates indicated, that Exhibits B and J are true and accurate copies of newspaper reports appearing in The New York Times on the dates indicated, that Exhibits F and I are true and accurate copies of newspaper reports appearing in the The Wall Street Journal on the dates indicated, and that the campaign materials in Exhibits D and E are, to the best of his knowledge and belief, true and accurate copies of campaign materials distributed within the District of Columbia by the organizations whose names appear on such materials.

John M. Quinn

Subscribed and sworn to before me this 27th of April, 1984.

Notary Public

My Commission Expires October 31, 1988

3504050162

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of the Complaint of Americans With Hart, Inc. Complainant, -against- Mondale For President Committee, Inc. Respondent.	MUR 1667

EXHIBITS TO LETTER OF
AMERICANS WITH HART, INC.
DATED APRIL 27, 1984

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THE WASHINGTON POST, THURSDAY, APRIL 26, 1984, P. A10, COLS. 2,3,4 & 5 EXHIBIT A

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Amnesia and Ambiguity Greet Delegate Inquiry

By George Lardner Jr.
Washington Post Staff Writer

On Jan. 13, the day after a how-to memo was sent out by the Mondale for President organization here, the paper work to start the first Mondale delegate committee was under way in New Hampshire, apparently at Mondale headquarters in Manchester.

The supposedly independent grass-roots effort was named the New Hampshire Second District Delegates for Mondale. Within a few weeks, according to reports belatedly filed this week at the Federal Election Commission, it had grown into an impressive arm of the Mondale campaign, taking in close to $60,000 from labor unions and individual donors throughout the country who somehow had been apprised of the needs of the six delegates and two alternates for Mondale in the Second District.

The first contribution, a $5,000 check, came in on Feb. 13 from the Washington-based political action arm of the Communications Workers of America. The United Auto Workers sent $5,000 more from Detroit nine days later. Individual donations poured in, too, $2,000 from a Bethesda real estate developer and his wife, $1,000 from a Miami insurance executive, another $1,000 from an architect in Daytona Beach, and yet another $1,000 from a housewife in Tiburon, Calif.

Efforts yesterday to find out how the word was passed produced a widespread burst of amnesia and ambiguity. By all accounts, the contributors made out their checks directly to the "New Hampshire Second District Delegates for Mondale" at 4 Neil Drive in Allenstown, N.H., the residence of the committee's treasurer, Anthony Redington.

"I do remember I was tapped [for a contribution]," said Howard T. Rosen, a Millburn, N.J., lawyer who sent the committee $250. How and by whom? "I don't know—I don't remember exactly," he said. "I've been generally supportive of the Mondale campaign and I heard the delegates up there needed some dough. How? I don't recall exactly at the moment."

New Hampshire Mondale Unit Studied

The chairman of the New York-New Jersey Port Authority, Alan Sagner, and multimillionaire Maryland builder Nathan Landow were also unclear about how they came to send $1,000 each (plus $1,000 for Mrs. Landow) up to Allenstown.

"One of my friends was involved in the [Mondale] campaign up there and called me," Sagner told a reporter. "I don't remember who it was .... I have so many friends in politics around the country. When somebody calls me, I send a check."

Landow, who headed fund-raising in Maryland for the 1980 Carter-Mondale campaign, said: "I get so many calls I don't remember who it was, but it was explained to me there was no problem [with the legality of it all] .... I think the request came directly from New Hampshire .... We get on these lists and if it's a Democratic cause and your name comes up, you get a call. It seemed like a good cause."

Redington, the Second District Committee treasurer, said he didn't want to talk about how the solicitations were made. He is well aware, he explained, of Sen. Gary Hart's charges, now pending before the FEC, that the Mondale delegate committees constituted an illegal attempt to circumvent federal spending limits on the national Mondale campaign.

"As you know, this whole delegate committee business has been challenged," Redington said in a telephone interview last evening. "So I don't think it's fair to talk about the specifics at this point."

According to Redington, who is research coordinator for a privately funded social welfare center in Concord, he and the other Mondale delegate candidates in the Second District "became aware of the opportunity" in early January to form a committee "to help elect ourselves." He said the tip came from someone in "the Mondale campaign" but he won't say who.

In any case, the chief delegate coordinator for the Mondale campaign in Washington, Elaine Kamarck, sent the group a two-page memo dated Jan. 12 telling them "how these committees should work," including advice on how to raise funds and making plain they could legally accept contributions up to $5,000 per delegate committee from "political action committees of issue groups or labor unions."

"Walter Mondale has made a decision not to accept money from PAC's for his campaign," Kamarck wrote. "Each delegate committee may make their own decision regarding PAC money."

Redington said yesterday that it never occurred to the group not to take PAC money. Although Mondale campaign manager Robert Beckel has said he sent the delegate committees and their treasurers a cover letter in the Jan. 12 packet urging them to "decline to accept" PAC contributions, the Beckel memo wasn't in the packet that his committee received.

"We didn't get the Beckel memo," Redington said. In fact, he added, "we haven't received it yet." But they did get the Kamarck memo.

A registration statement was typed up for the Second District Delegates for Mondale on Jan. 13. Redington signed it as treasurer on Jan. 23 and it was mailed from Manchester on Feb. 8, along with a similar form for the First District Delegate Committee. A typewriter from Mondale headquarters in Manchester appears to have been used for both sets of statements and envelopes.

Asked who prepared the forms, Redington said, "I don't recall offhand .... Everything else that's gone to the FEC, I certainly typed myself."

With the contributions flowing in, the Second District committee set about in earnest to prepare for the Feb. 28 primary. Campaign workers turned up in impressive numbers, materializing from Maine, Minnesota, Michigan, Missouri, Washington, D.C., and Alabama and elsewhere.

Redington's group paid out more than $14,000 for their "subsistence" in the state. At least 10 workers who got subsistence checks from the Second District committee Feb. 22 also turned up on the national Mondale campaign's payroll for March 1.

Under federal law, expenditures "made by any person in cooperation, consultation, or concert with, or at the request or suggestion of, a candidate, his authorized political committees or their agents, shall be considered a contribution to such candidate." Republication by "any person" of a campaign's literature is also chargeable to the candidate.

"I think it was a fair use of our funds," Redington said of all the subsistence payments. "They were distributing our literature and carrying our posters." But he also acknowledged that the literature in general was "a reprint of standard Mondale literature with our [delegate] names added."

Despite all the efforts, Hart won the Feb. 28 primary and the Mondale delegate committee was left with a handsome surplus of unspent funds. It began transferring the money in March to sister committees across the country, including $1,000 to the 10th District Delegates for Mondale in Pembroke Pines, Fla., on March 9, and $1,250 to "Cong. Dist. 2 for Mondale" in Tallahassee on March 9.

"We were made aware that there were other delegate committees and that they could use the funds," Redington said. He would not say how they found out.

Staff researcher Marsha Schuetz contributed to this report.

EXHIBIT B

EXHIBIT B

THE NEW YORK TIMES, THURSDAY, APRIL 26, 1984 P. B8, COLS. 2,3,4

How Delegate Committees Aided Mondale Drive

By DAVID SHRIBMAN
Special to The New York Times

WASHINGTON, April 25 — In the last month, as former Vice President Walter F. Mondale's Presidential committee approached the Federal spending limits, more than six dozen organizations to support Mondale convention delegates sprang up across the country to strengthen his drive for the Democratic nomination.

These committees, now totaling 127, are at the heart of the latest campaign dispute between Mr. Mondale and Senator Gary Hart of Colorado, his principal rival for the nomination.

The delegate committees, set up to support candidates for delegate seats at the party's national convention, are separate from the candidate's own committee set up to support his bid for the nomination.

Records on file with the Federal Election Commission demonstrate a close connection between the delegate committees and the Mondale campaign, leading Senator Hart to raise questions about possible violation of Federal election laws.

Murky Legal Question

However, the issue of whether these delegate committees must act independently of the campaign they support is a murky legal question that must still be determined by the six members of the commission.

"The regulations certainly allow for delegate committees to be formed and spend money," said Sharon L. Snyder, a spokesman for the commission. "The issue of coordination has yet to be fully settled."

Mr. Hart's campaign has accused the Mondale campaign of being the beneficiary of contributions made by special-interest political action committees. Both candidates have pledged not to accept contributions from PAC's, but the Mondale delegate committees were not bound by that pledge.

Mr. Mondale today asked delegate candidates to "terminate any efforts under way" to create new committees and asked those already in existence to cease their operations. The delegate committees assumed prominent roles as the Mondale campaign, which had spent heavily in the early weeks of the political season, approached the $20.2 million Federal spending limitation.

Mr. Mondale's spending records, filed late last week, showed that he had spent $13.3 million, with Iowa caucuses and primaries still to come in Texas, Ohio and California.

While Mr. Mondale spent only $30,223 in Pennsylvania in efforts leading to the April 10 primary there, delegate committees spent $80,000 to $100,000 in support of his campaign in that state. In New York, Mr. Mondale spent $77,082, but the state A.F.L.-C.I.O. added about $100,000 to 34 delegate campaign committees operating in the state before the April 3 primary.

Senator Hart's campaign, in a complaint filed with the election commission earlier this month, charged that the Mondale delegate committees constituted a "massive evasion of the spending and contribution limitations of the Federal election law."

Commission officials declined to comment on the charges raised by Mr. Hart. In a statement released in Washington today, Robert Beckel, Mr. Mondale's campaign manager, said he was "confident that our delegates and the Mondale campaign have fully complied with both the letter and the spirit of Federal election law."

There is, however, evidence of links between the Mondale campaign and the delegate committees, which he and his aides have described as independent of the campaign itself.

Elaine Kamarck, a Mondale staff member working on delegate selection, issued a memorandum on Jan. 12 saying that the Mondale campaign "will assist each slate of delegates in forming a committee if they so desire."

Mr. Beckel said today that Federal regulations "made it clear" that delegate committees "could confer with a Presidential campaign on the preparation of materials intended for use by volunteers, such as palm cards, leaflets and bumper stickers."

Overlapping Functions

The names of at least two members of Mr. Mondale's paid staff have turned up on reports filed with the election commission by Mondale delegate committees. Margaret Munteller of Sioux City, Iowa, was listed on the Mondale payroll in January. She was also paid on a per diem basis in March by a Mondale delegate committee based in Forsyth, Ill., and paid a salary by a second Mondale delegate committee based in Madison, Wis.

Daniel R. Wilson of Rockville, Md., who has been working for Mr. Mondale for more than a year, has appeared both on the Mondale payroll and the payroll of the Wisconsin At-Large Delegate Mondale Committee and a Mondale delegate committee based in Charleston, Ill.

John M. Quinn, general counsel for the Hart campaign, found what he described as "a striking uniformity" in reports filed by Mondale delegate committees in Illinois. He said that 16 Illinois reports were delivered to the commission on the same morning in envelopes with the same handwriting and the same return address.

The Kamarck memorandum notes that delegate committees may receive contributions from PAC's. "Walter Mondale has made a decision not to accept money from PAC's for his campaign," she wrote. "Each delegate committee may make their own decision regarding PAC money."

Later in the campaign, however, Mr. Mondale called upon the delegate committees to refuse to accept PAC money. Mr. Beckel said today that he believed that "since that time, virtually all such contributions have ceased."

EXHIBIT C

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Mondale Says PAC Aid to Delegates Ebbing

THE WASHINGTON POST
APRIL 24, 1984
P. A 3

EXHIBIT C

By Martin Schram
and George Lardner Jr.
Washington Post Staff Writers

Walter F. Mondale said yesterday that "almost all" contributions to Mondale delegate committees from special-interest groups have ceased, and he contended that Sen. Gary Hart's renewed attacks on the subject are the acts of "a desperate candidate."

Meanwhile, Federal Election Commission records showed last night that individual delegate committees were springing up as Mondale officials were doubting their existence. Other FEC records showed that the agency's commissioners intended the committees to be genuinely independent of the national campaign.

Hart (D-Colo.) has charged that spending by the Mondale delegate committees constitutes "back door" and perhaps illegal funding for the Mondale campaign. And he is trying to turn the controversy into a major issue.

Delegate committees are ostensibly autonomous groups created to elect delegates to the national party conventions. Their expenses, when independently made, are not counted against a candidate's federal spending limits.

Delegate-committee spending on his behalf could be a boon for Mondale, who is approaching the ceiling of about $24 million with several crucial races, including those in Texas, Ohio and California, to come.

Mondale told editors and reporters of The Washington Post that the existence of the delegate-selection committees and their acceptance of funds from political action committees (PACS) of labor unions and other groups "is legal and authorized" by FEC regulations.

But Mondale said that he has written a letter urging the autonomous Mondale delegate committees not to accept PAC funds. Mondale officials said that the letter was sent to union presidents in the last days of the Pennsylvania primary campaign.

AFL-CIO spokesman Murray Seeger said that "as of last week" all labor PAC contributions "that are under our control have stopped." But he said that "a small amount that was in the pipeline" will be sent to Mondale delegate committees in Maryland and Ohio.

Top Mondale advisers said, meanwhile, that the Mondale delegate committees will not be a factor in the two biggest upcoming state contests—the May 5 Texas caucuses and the May 8 Ohio primary.

Mondale campaign chairman James Johnson said initially that he did not think Mondale delegate committees had been formed in Texas or Ohio. But he urged a reporter to check this information with the Mondale expert on the matter, campaign treasurer Michael Berman.

Berman said that there are Mondale delegate committees in both states, according to FEC records that he said were his source.

Berman said that, as of Thursday night, FEC records listed one Mondale delegate committee in the Cleveland area and two in Texas congressional districts. However, he said that he did not think any of those were "active."

But a Washington Post check of FEC records last night showed that the Mondale delegate committees are sprouting anew. There are three Mondale delegate committees in Ohio and four in Texas, the records showed. There are 10 in Maryland, which also has a presidential primary on May 8.

The number of Mondale delegate committees that have filed with the FEC had swelled from 87 early this month to 122 last night, including some newly reported committees in New York and Pennsylvania where the primaries are over.

Told of the growing number of Mondale delegate committees shown in FEC files, Mondale campaign chairman Johnson said he was surprised, but added: "Well, at least no one can say we're organizing and controlling what these committees are doing."

The delegate committee controversy involves two issues. One concerns PAC contributions to the committees; the other concerns committee expenditures to elect delegates pledged to Mondale.

On the first point, congressional law and FEC regulations permit PAC contributions to delegate committees. But Hart and Mondale voluntarily refused to accept PAC funds for their presidential campaigns.

Hart has charged that Mondale is hypocritical in rejecting PAC money himself while delegate committees supporting him accept it.

On the second point, congressional law and FEC regulations authorize the creation of autonomous delegate-selection committees and permit them to spend money for such grass-roots activities as leaflets, bumper stickers and lawn signs designed to help individuals running for delegate. The regulations provide that such expenditures will not be counted against a candidate's spending ceilings as long as the expenditures are made by truly autonomous committees, acting independently of the candidate's campaign committee.

The FEC, meanwhile, issued several transcripts of 1980 discussions about contributions to and spending by delegates. The FEC commissioners and their lawyers made a number of remarks that appear to constitute disapproval of at least some practices of the Mondale campaign and its delegate committees.

At an FEC meeting on Jan. 31, 1980, FEC general counsel Charles N. Steele said that the FEC had always taken a strong position that "the desires of the candidate and communication on how he wishes the money to be spent, or suggestions as to how the money should be spent comes within the prohibitions" of the law.

At a meeting on Feb. 14, 1980, assistant FEC counsel Patricia Plove made a similar point, saying that "expenditures which are in cooperation, consultation or concert with, or at the request or suggestion of the candidate are contributions."

The Mondale campaign's chief delegate coordinator, Elaine Kamarck, sent a memo to Mondale delegates Jan. 12 as "a brief outline on how these [delegate] committees should work."

In it, she advised delegates on how to raise and spend money. "Please follow the instructions on the enclosed memorandum," she said, "and when in doubt do not hesitate to call the Office of the Legal Counsel here at the campaign headquarters."

Yesterday, Hart campaign officials released a copy of an April 6 fundraising letter from Charlene Drew Jarvis, head of the Mondale Delegates D.C. Committee. Jarvis wrote that the delegate committee was organized "with the assistance of the Mondale national campaign office" and said was the "principal finance committee" for Mondale and his delegates in the District. Individuals, organizations and PACS may give up to $4,000 to the committee, she wrote.

The Hart campaign has complained to the FEC of republication by delegate committees of Mondale campaign literature and of the hiring by some committees of persons who had just been taken off the Mondale organization's payroll.

Mondale said yesterday that he first learned that PAC money was being accepted by Mondale delegate committees during the New York primary.

"And as soon as I found out about it I wrote a letter" urging the committees not to accept PAC funds. "And I think almost all the PAC money has been terminated."

Kamarck's memo said how delegates could form committees and that PAC contributions "are permitted."

Asked about that, Mondale said, "... But there was never any doubt in my mind that I did not want PAC money used .... When I found out it was being used ... I went at it even harder. I mean, there's no games being played."

Later, in Baltimore, Mondale said of Hart, "What we see here is a desperate candidate who is saying things that won't stand analysis."

Staff writers David Hoffman and Don Balz contributed to this report.

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EXHIBIT D

EXHIBIT D

MONDALE DELEGATES - D.C. COMMITTEE
1200 Massachusetts Avenue, N.W.
289-6926

April 5, 1984

[redacted]

You are among Walter Mondale's most valuable supporters because you have translated your belief in his candidacy for President into critically needed financial support. Knowing of your commitment to Fritz Mondale and your interest in the District of Columbia, I am writing to ask for your assistance in the Mondale effort in the District of Columbia.

The Mondale Delegates - D.C. Committee, organized in accordance with Federal Elections Commission regulations and with the assistance of the Mondale national campaign office, is the principal finance committee for Fritz Mondale and Mondale delegate candidates in the District of Columbia. Mondale Delegates - D.C. Committee is a legally separate entity from Mondale for President.

The Mondale Delegates - D.C. Committee can accept contributions from any supporter, including those who have given the maximum to the national campaign committee. Individuals, organizations and political action committees may give up to $4000.00 to the Mondale Delegates - D.C. Committee.

Arthur Rothkopf has graciously agreed to assist the committee in coordinating fundraising. Money raised on behalf of the Mondale Delegates - D.C. Committee will go towards covering the costs for phones, printing, postage and literature. Checks may be mailed to the above stated address.

The Mondale Delegates - D.C. Committee appreciates your assistance and looks forward to your continued support for Walter Mondale and Mondale delegate candidates in the District of Columbia.

Sincerely,

Charlene Drew Jarvis

CHARLENE DREW JARVIS
Chairperson
Mondale Delegates D.C. Committee

We really need your help!

thought you might like to [illegible]

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EXHIBIT E

DC DEMS FOR MONDALE

1200 Massachusetts Ave. NW Washington, DC 20005 · 289-6926

EXHIBIT E

Dear Friend:

The local campaign for delegate candidates pledged to Walter F. Mondale urgently needs your support.

Given the hard fight and exciting nature of the overall campaign to date, it's no wonder that you who have given so generously to the national Mondale effort feel your share is done. But now the national campaign is bumping against its legal spending limits and must reserve remaining funds for expensive media costs in states like Texas and California. Local-level Mondale delegate election committees are now expected to finance voter outreach efforts the national campaign cannot.

We're eager to do just that but lack the funds to spread the Mondale message to D.C. Democrats. Although our fixed costs are covered, voter outreach expenses remain: 7¢ a phone call, 17¢ for 100 mailing labels, 9.3¢ for each piece of literature mailed, a goal of 40,000 voters to contact. The more you can help, the more people we can reach.

Voter turnout for Mondale at the May 1st primary is important. The national media will eye the results here carefully: after all, it's their own backyard.

It's also where Fritz Mondale and his family have lived for 20 years, sending their children to public schools, supporting home rule, backing the arts, working as Vice President to procure additional Federal funding for more judges, making sure D.C. becomes a better place for us all.

Right now you can help him most by supporting the local campaign to elect delegate candidates pledged on Fritz's behalf. Call 289-6926 if you can volunteer your time. Or send a check for $25, $30, $50 or more made out to Mondale Delegates--DC to 1200 Massachusetts Ave. NW, D.C. 20005 and let us spread the word for you.

Unlike any other presidential candidate, Fritz Mondale has already shown us what a good neighbor can be, a neighbor to count on when we need him. Send the nation a message. Back a proven friend.

Sincerely,

Tom Collier Gregory Dyson

Tom Collier & Gregory Dyson
Campaign Coordinators

Paid for by Mondale Delegates--DC

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EXHIBIT F

EXHIBIT F

PAC Funds Questioned

Money for Mondale May Be Illegal

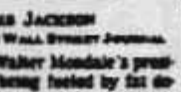
By Brooks Jackson
Staff Reporter of The Wall Street Journal

WASHINGTON—Walter Mondale's presidential campaign is being fueled by fat donations from labor that some legal experts say may violate the law.

Records submitted to the Federal Election Commission show that well over 100 state-level Mondale "delegate committees" have been set up since January and have received more than $247,000 from political-action committees run by unions. The trend suggests that the total given during February and March alone could exceed $400,000 by the time a full accounting is received.

PACs legally can't give more than $5,000 directly to Mr. Mondale's central campaign committee, and in any case the former vice president has declined to accept such donations directly on ethical grounds. But some union PACs are giving larger total amounts to the supposedly independent committees that were set up at the instigation of the Mondale camp.

The American Federation of Teachers has spread $54,180 to 26 of the delegate committees, for example. The United Auto Workers has given at least $33,360. The American Federation of State, County and Municipal Employees has given at least $43,300 and the Communications Workers of America has given at least $23,500.



"If this is all being orchestrated by the same group of people, it would not be legal," says Jan Baran, chairman of the American Bar Association's Committee on Election Laws.

Mr. Baran is a Republican. A leading Democratic election-law expert, William Oldaker, says simply "no comment" when asked if the Mondale campaign's use of the delegate committees is legal.

The election commission currently is considering an official protest filed last week by Sen. Gary Hart's campaign.

Grass-Roots Organizations

At issue is whether the delegate committees, which Congress envisioned as grass-roots organizations, are being run from Mr. Mondale's campaign headquarters in Washington to get around legal limits on what he can raise and spend. If so, then some argue that the contribution limits apply collectively to all the Mondale entities, and PACs that have given a total of more than $5,000 to them have violated the law.

The Mondale campaign says the committees are legal, even though they have been set up with the active encouragement and advice of Mondale headquarters, because they have separate treasurers and make their own decisions. "We have no control," says Robert Bechel, Mr. Mondale's campaign manager.

Reports received at the Election Commission, however, show that the committees are being funded largely by PACs run by unions that are in close cooperation with the Mondale campaign organization, and that the committees themselves have numerous links to the campaign staff and to one another.

The American Federation of Teachers, for example, sent out most of its donations from its Washington office during three days in late March. The auto workers sent six identical checks for $5,000 apiece to six Mondale committees in Illinois on a single day.

Reappear on Payrolls

Furthermore, many campaign workers have been dropped from the payroll of the central Mondale committee only to reappear on the payrolls of the supposedly grass-roots committees.

Before the Wisconsin caucuses on April 7, for example, a Mondale delegate committee in Madison had 13 people on salary. All had been on the payroll of the central Mondale campaign committee in February.

This "grass-roots" group raised only $26 locally during March. The rest of its financing consisted of two $5,000 checks from Washington-based labor unions and a transfer of $5,000 from another Mondale delegate committee in Michigan, which apparently had a surplus after the caucuses in that state on March 17.

Based on reports filed so far, it appears that more than 80% of the money received by Mondale delegate committees is coming from labor PACs, and nearly all that is coming from the unions' national headquarters rather than from local unions. And so far, more than 30 former Mondale campaign employees have switched to the payrolls of Mondale delegate committees.

Rolling Funds Forward

As delegate committees in one state finish their work, they often roll any surplus funds forward to another delegate committee in another state where a presidential-nomination contest is coming up. In mid-March for example, two Mondale committees in New Hampshire forwarded a total of $4,000 to a delegate committee in Chicago. After the Illinois primary on March 20, two Illinois committees forwarded $3,300 to a delegate committee in Kansas, which held its caucuses on March 24.

Some Mondale delegate committees are distributing literature that doesn't mention delegates at all, only Mr. Mondale. The Wisconsin organization simply reprinted some fliers produced by Mondale headquarters.

By using the delegate committees for field work, the main Mondale campaign committee is free to spend more of its own, limited funds on advertising. Further, the committees open up access to labor-PAC money.

The green light was flashed in a Jan. 12 memo to delegates by Elaine Kamarck at Mondale headquarters. "Political Action Committees can contribute up to $5,000 to a delegate committee," she said. And, though noting that Mr. Mondale wasn't taking PAC gifts, she said, "Each delegate committee may make their own decision."

When the first PAC gifts showed up publicly much later, Mr. Mondale insisted he had no control over the delegate committees. "I issued a statement saying I wanted it stopped. . . . I'm opposed to the use of PAC money," he said on March 31.

But the latest reports show that by then PACs had given plenty, and that delegate committees have continued to accept labor-PAC gifts. Delegate committees reported accepting a total of $11,100 in PAC money during the first few days of April.

The Federal Election Commission isn't expected to decide the matter until after the last wave of primaries on June 5, too late to do Mr. Hart any good. And if it approves Mr. Mondale's use of the delegate committees, it would set a precedent that would allow practically unlimited spending by future presidential candidates. Mr. Baran, the Republican lawyer, says of the Mondale tactic, "It kind of makes Swiss cheese out of the election laws."

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EXHIBIT G

EXHIBIT G

THE WASHINGTON POST
WEDNESDAY, APRIL 25, 1984
P. A1, COL. 2

Committees for Mondale Share Money and Staff

Striking Coordination Seen

By George Lardner Jr. and David Hoffman
Washington Post Staff Writers

Reports coming in daily to the Federal Election Commission reveal a striking pattern of apparent coordination between supposedly independent Mondale delegate committees around the country and Walter F. Mondale's national campaign organization, as well as coordination among the committees.

The FEC records show repeated transfers of money from a Mondale delegate committee in one state to a sister group in another. They also show national campaign staffers shifting to delegate committee payrolls in states with upcoming primaries or caucuses.

The records are replete with instances of the ostensibly autonomous committees sending the FEC registration statements made out in the same handwriting, mailed in envelopes apparently typed on the same typewriter and reporting joint spending at print shops far from their home bases.

The practices of the Mondale delegate committees, which number 124, have come under increasing fire recently, for accepting money from the political action committees (PACs) of labor unions and other special interest groups and for the fact that their spending is not being counted against federal

See DELEGATES, A8, Col. 5

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Groups for Mondale Share Money, Staff

THE WASHINGTON POST
WEDNESDAY, APRIL 25, 1984
P. A8, COLS. 5 & 6

EXHIBIT G

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DELEGATES, From A1

spending limits applicable to presidential candidates.

The campaign organization of Sen. Gary Hart (D-Colo.) has asked the FEC to declare the practice illegal, and the third Democratic candidate, Jesse L. Jackson, said yesterday that "the law is either being stretched or extended or broken."

Common Cause, the self-styled citizens' lobby and one of the main forces behind present election laws, charged yesterday that the Mondale committees are "threatening the integrity of the presidential public financing system and undermining its credibility and effectiveness."

Mondale forces have denied any illegality, but a Mondale campaign official said that the former vice president called AFL-CIO President Lane Kirkland Monday about contributions from labor PACs.

The campaign official, who asked not to be identified, said Mondale told Kirkland that he wanted the union PACs to stop the flow of money to delegate committees. As for the legality of the committees' spending without regard for national spending limits, however, the Mondale adviser said the committees were set up without help from the Mondale campaign. Then he added: "If we helped set them up, then we have some problems."

Asked about the dispute at a news conference in Nashville, Mondale said the committees were "autonomous" and "spending very modest amounts of money." He defended the practice as "perfectly legal, perfectly proper" and asserted that it had been "authorized" by the FEC.

Congress authorized independent delegate spending several years ago to foster grass-roots efforts by individuals seeking to go to their party's national convention.

But transcripts of FEC meetings in 1980 show that the commissioners felt strongly about preventing any such spending "in cooperation, consultation, or concert with, or at the request or suggestion of, a candidate, his authorized political committees, or their agents."

FEC reports checked yesterday show staffers who had been on the national Mondale campaign payroll also appearing as salaried delegate committee employes in some states.

On March 29, a few days before the Wisconsin caucuses, the "Wisconsin At-Large Delegate Mondale Committee" paid the salaries of several out-of-state staffers who had arrived to help. At least eight of them also drew paychecks that month from the Mondale for President Committee Inc. here.

The only one who could be immediately reached was Steve Elmendorf, now deputy field coordinator for the Mondale campaign in North Carolina. He said he was too busy to comment because Mondale is coming into that state today.

The reports also show transfers of money from one delegate committee to another. In a belated financial report filed yesterday, for example, the New Hampshire Second District Delegates for Mondale, one of the first to be formed, disclosed shipments of more than $12,000 after the New Hampshire primary to Mondale delegate committees in Florida, Illinois and Pennsylvania.

The Montana At-Large Delegates for Mondale Committee based in Helena said its biggest contribution, $1,500 on March 26, came from the Kentucky At-Large Delegates Committee for Mondale. It got another $260 from a delegate committee in Florida. The Democratic caucuses in Montana were held March 25.

The reports on file at the FEC also show that:

- Four delegate committees with addresses in Brooklyn and Staten Island all submitted statements of organization in what appears to be the same handwriting with the same New York bank as a depository, all made out on the same day and all mailed from Brooklyn on April 3, the day of the New York primary.
- Two committees in Texas, one ostensibly headquartered in San Antonio and one in Dallas, sent in registration forms April 2, in envelopes postmarked in Austin and apparently addressed by the same hand.

The treasurer of the Dallas-based committee, Millie Bruner, informed the FEC by letter yesterday afternoon that "we have closed this committee as it is no longer needed." Bruner sent the notice on stationery identifying her as a member of the Democratic National Committee.

- An Arizona delegate committee for Mondale sent in its spending report April 13 and noted that a copy

EXHIBIT G

THE WASHINGTON POST
WEDNESDAY, APRIL 25, 1984
P. A8, COLS. 5 & 6 (con't)

had been sent to the "General Counsel, Mondale Campaign." The counsel, David Ifshin, declined to comment on any question affecting the delegate committees because, he said, "that matter is in litigation."

• Contributions from organized labor's PACs provided the delegate committees with most of their money, often on the same day or in the space of a few days.

The At-Large Delegates for Mondale in New York City, for instance, reported four $5,000 contributions on March 26, from the Service Employes International Union, the American Federation of State, County and Municipal Employes, the American Federation of Teachers' Committee on Political Education and the United Auto Workers.

• The Pennsylvania At-Large Delegate Committee gave $8,500 to nine other Mondale delegate committees last month in a four-day period.

• At least three Florida committees, one hundreds of miles away, in Pensacola, patronized the same printing shop in Hollywood, Fla.

Mondale campaign Treasurer Michael Berman said yesterday that the fact that Mondale staffers wound up at times on the payrolls of delegate committees "suggests we laid them off and they may have gone someplace else. I don't think that's any evidence that we coordinated . . . ."

As for interstate transfers of money from one committee to another, he said all that showed was that "they had extra money and they passed it on . . . . I think the delegate committees know they were supposed to operate on their own and would not have been calling down here."

A Jan. 12 memo to all Mondale delegates from chief delegate coordinator Elaine Kamarck, however, told them how to set up their committees and concluded, "When in doubt, do not hesitate to call the Office of the Legal Counsel here at the campaign headquarters."

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EXHIBIT H

THE WASHINGTON POST
THURSDAY, APRIL 26, 1984
P. A1, COL. 5

EXHIBIT H

P. 1 OF 3

Mondale Asks Panels To Disband

He Says Uproar Over Committees Hurts Campaign

By David Hoffman
and Martin Schram
Washington Post Staff Writers

CHATTANOOGA, April 25—Walter F. Mondale today asked his supporters to disband the 124 ostensibly independent delegate committees supporting his presidential bid, saying that controversy over their finances and operation was "undermining my capacity to carry on a campaign on matters that count."

Attempting to extinguish a political brush fire that his aides said they feared could hurt his campaign seriously, Mondale announced that he wanted the committees "terminated, period."

Mondale's action was prompted by reports, first in The Washington Post, that there appeared to be a pattern of coordination between the delegate committees, which are supposed to be autonomous local efforts to elect Mondale delegates. They are not supposed to work in coordination with the national campaign.

Federal Election Commission reports indicated that the delegate committees were hiring staff members laid off by Mondale's national committee, were sending money from committees in one state to those in another and were continuing to accept contributions from labor and other special-interest political action committees (PACs) even though Mondale urged them not to and has refused campaign contributions from such groups.

His decision was made Tuesday night after giving a major speech that attacked President Reagan's

See MONDALE, A11, Col. 1

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THE WASHINGTON POST Thursday, April 26, 1984 A11

Mondale Asks His Supporters to Disband Delegate Committees

MONDALE, From A1

plan to put taxpayers in space and feeling that the news media were focusing unfairly on the controversy over the delegate committees.

Sen. Gary Hart (D-Colo.), Mondale's chief rival for the Democratic presidential nomination, asked on Mondale's delegate committees as a campaign issue and called for reform of the campaign-finance system.

"Give the money back, Walter," he told a cheering audience of about [illegible] at Vanderbilt University. "That's the way to solve the problem. Just give the money back."

In Fort Worth, Mondale was asked about Hart's suggestion. "This money . . . is used at the local level for delegate selection. It's not for me . . . so the advice is rejected," he said.

Jesse L. Jackson, the third candidate for the Democratic nomination, called Mondale's decision "an admission that they were using an immoral and unethical opposition to the first place and perhaps even illegal . . . . It is a step in the right direction, and it is good leadership."

Hart has filed a complaint with the FEC questioning the legality and propriety of the committees. He accused Mondale of using the committees as a "back-door" method of exceeding federal campaign spending limits and of accepting PAC contributions. Mondale, who like Hart has refused to accept PAC money, has denied the charges.

At a news conference at Chattanooga State Technical Community College, Mondale said that he is attempting to disband the committees, not because they acted illegally but because he no longer wants to answer questions about their activities.

"These committees are operating on their own, making their own judgments, and even though I don't know a thing about it, haven't been involved in it, don't know what they're doing, couldn't possibly know what they're doing, I find that I have to answer the questions and somehow try to find out. I don't want to do that," Mondale told reporters.

"So rather than keep answering these questions, I said let's just get rid of these committees to the fullest extent possible," Mondale added.

He said that he had made "strenuous" efforts—including letters from himself and his campaign manager, Robert C. Beckel—to stop the flow of PAC money, chiefly from organized labor, to delegate committees.

Mondale said today, however, that these letters "didn't work."

He complained that "the clutter" over the committees was "interfering" with his campaign messages.

Asked whether the money raised so far by the delegate committees, about $200,000 through the end of March, should be counted toward his $20.4 million federal spending limit for the primaries and caucuses, Mondale said, "I don't think that's necessary or appropriate." Mondale officials said the total could reach $500,000.

As of the end of March, Mondale's campaign had spent $13.3 million of the $20.4 million limit, plus another $4 million designated for fund-raising.

The first step in the formation of the committees was last summer, according to Beckel.

Mondale's campaign counsel, David Robin, who formerly worked at the FEC, told top Mondale campaign officials that federal campaign regulations provided for creation of delegate committees for such grass-roots work as distributing literature, bumper stickers and lawn signs.

The matter was not discussed during the fall, Beckel said, adding that Mondale was never consulted about it.

In January, after the people who would be running in New Hampshire as delegates had been chosen at party caucuses, Robin told Beckel that these delegates were forming delegate committees.

Beckel said that he discussed this with campaign chairman James Johnson, who said that the delegates should be sent a letter notifying them that Mondale had decreed that the national campaign committee would not accept PAC contributions.

Beckel wrote such a letter, but along with it in a packet of instructions was a memo from Mondale's chief delegate coordinator, Elaine Kamarck.

The Kamarck letter told the delegates how to form a delegate committee and raise money for it. Her memo said that contributions from PACs "are permitted," added that Mondale would not accept PAC money but said, "Each delegate committee may make their own decision regarding PAC money."

Beckel now says that Kamarck's memo was "regrettable," adding that he had not known of its existence.

All the while, Mondale was not aware that the Mondale delegate committees were accepting PAC money, Beckel said. He added the former vice president first learned of it during the New York primary campaign, when he read in a Washington Post article of March 26 that Mondale delegate committees in each New York congressional district were "accepting money from political action committees, while Mondale makes a point of saying that his own campaign will not accept 'PAC money' from special interests."

Beckel said that Mondale raised the matter with him and Johnson at a meeting that night.

Mondale asked what was going on, Beckel said, who added that he explained the story was accurate, and Mondale responded that he had made a commitment not to accept PAC contributions.

Beckel said he replied that these were not Mondale campaign committees, they were autonomous delegate committees that included union members who wanted to be elected delegates and could accept union funds for their efforts.

"And at that point in the meeting, he really let me have it," Beckel said. "He told me, 'I want that stopped.' "

But it was not until after the New York primary that Mondale's and Beckel's letters stating that Mondale wanted the acceptance of PAC funds stopped went to Mondale delegates and labor officials.

By then, the crucial Pennsylvania primary was drawing to a close—and Mondale delegate committees there were playing a more visible role.

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THE WASHINGTON POST
THURSDAY, APRIL 26, 1984
P. A11 (con't)

EXHIBIT H

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The Mondale storefront headquarters in Philadelphia was a Mondale delegate-committee headquarters—paid for by the delegate committee, which accepted PAC funds. Mondale's campaign headquarters operated out of an upstairs suite in a Philadelphia hotel.

"The budget I had made out for Pennsylvania on the day before the New Hampshire primary called for virtually no headquarters expenditures in Pennsylvania," Beckel said.

"I had no intention of putting up a bunch of expensive storefronts there anyway. That was a big state primary, and 75 percent of our spending was going to be on media. Most of the things that the delegate committees spent money on were things that we just would not have spent money on otherwise."

As recently as Monday, top Mondale officials said they were convinced that Hart's efforts to turn the delegate-committees controversy into a major campaign issue would prove unsuccessful.

But when Mondale held a news conference in Nashville after he had just called for a freeze on Reagan's plan to put defensive weapons in space, he was besieged by questions about the delegate committees.

"At that point it just didn't seem worth it any more," Beckel said. "In Tennessee, we wanted the 'Star Wars' speech to be Mondale's message, but the delegate committees had become our message."

Top Mondale aides met that evening and drafted Mondale's statement asking his delegate committees to disband.

Mondale repeated today that he believes the delegate committees were created for "thoroughly legitimate" purposes: to allow local participation in a national campaign. When asked about reports that money was transferred from delegate committees in one state to another state, Mondale said such action was "legal" and "permissible" and had been checked in advance with the FEC.

Mondale brushed aside questions about whether his handling of the delegate committees showed a lack of leadership. He said "one test" of his leadership was his attempt to stop PAC money from flowing to the delegate committees and another would be his effort to terminate the delegate groups.

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EXHIBIT I

EXHIBIT I

Cooling a Controversy

Mondale Sheds Delegate Panels

By Brooks Jackson
Staff Reporter of The Wall Street Journal

WASHINGTON – With the Democratic presidential nomination seemingly once again within his grasp, Walter Mondale issued orders to disband a network of labor-financed committees that helped him through the darkest days of his campaign.

In doing so, Mr. Mondale hopes to cut his losses from a controversy that was threatening to blow up into a long-running news story that would focus public attention on his ties to organized labor.

But the issue may not go away. The Mondale campaign still faces the likelihood of a Federal Election Commission inquiry into whether the committees violated federal election laws. And the affair may make it all that much easier for Ronald Reagan to portray Mr. Mondale as a pawn of organized labor in any fall election contest between the two men.



But Gary Hart is hammering away at the issue now. "Give the money back, Walter," Mr. Hart told a university crowd in Nashville. "The Democratic Party won't defeat Ronald Reagan if its candidate adopts the ethics of Ed Meese." Mr. Hart demanded that the former vice president refund the more than $315,000 that union political action committees have poured into the committees.

Mr. Mondale sent telegrams yesterday to all candidates for convention delegate, asking them to cease forming new "delegate committees" and to terminate existing committees.

He said he still believes that the activities of the committees, numbering more than 120, are legal and proper. But he said he wants them disbanded "because I believe that the discussion of the technicalities related to federal election regulations were interfering with my ability to focus the Democratic Party's debate on the more critical issues facing our country."

Indeed, reporters traveling with Mr. Mondale have bombarded him for days with questions about the hundreds of thousands of dollars that have poured into the committees from labor-run political action committees, and about the plentiful signs that the supposedly "grass-roots" groups were being orchestrated and largely financed from Washington.

Forceful Words

The candidate decided to jettison the committees on Tuesday after the issue dominated a news conference in Nashville. Although some staff aides argued that voters don't care much about the issue, and that the candidate might anger his union supporters if he seemed to be repudiating their help, Mr. Mondale issued forceful words yesterday.

"I'm just going to get rid of them," he said. If some committees refuse to disband, "I will find a remedy some way," he said, adding that AFL-CIO President Lane Kirkland "agrees with me."

But another union official speculated that some delegate committees may continue anyway. "Obviously, sending a wire doesn't disband them," said Jerry Clark, political director of the American Federation of State, County and Municipal Employees.

The speed with which Mr. Mondale reacted shows he has become more nimble in dealing with budding political embarrassments. Before his February setbacks in Iowa and New Hampshire, he was criticized as being a smug front-runner unwilling to respond to criticism.

Mr. Mondale doesn't need the delegate committees as much now as he seemed to a month or so ago when rival Gary Hart was riding a string of victories. Back then, Mr. Mondale was facing the prospect of being outspent substantially in the remaining primaries, because he had spent most of the $24 million allowed by federal law while counting on wrapping up the nomination early.

Mondale aides insist that the committees were formed to allow candidates for convention delegates to spend money at the grassroots level, for such items as bumper stickers, signs and pamphlets.

But in New York, Pennsylvania and Wisconsin, states in which Mr. Mondale staged his comeback, unions poured in large sums for such things as rental of storefront offices and hiring of dozens of workers, many of whom had previously been employed by the Mondale campaign itself. Of the $315,000 counted so far in disclosure reports at the Federal Election Commission, more than half was given in late March and early April in those three states.

Disclosure Reports

The full amount of union funding isn't yet known and might not be for months. Many Mondale delegate committees haven't yet filed required disclosure reports. Some union PACs continued to send money as recently as Monday, despite Mr. Mondale's public statements that he was trying to discourage the PAC gifts. Gifts given in April needn't be disclosed until July, in some cases.

The AFL-CIO, for example, said it had recently sent donations to delegate committees in Maryland and Ohio, which have primary elections on May 8. A spokesman said the labor federation gave about $30,000 in all before Mr. Kirkland ordered the gifts stopped on Monday.

Some union officials were irritated by Mr. Mondale's action. "I think he has mishandled this the whole way," said the chief political operative of a major union, adding that he believes the candidate was "spooked" by criticism in the press.

But Rachelle Horowitz, political director of the American Federation of Teachers, which pumped more than $54,000 into Mondale delegate committees, said most labor supporters would take the candidate's action in stride. "They understand," she said. "They don't want the backlash in the states against this."

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EXHIBIT J

EXHIBIT J

THE NEW YORK TIMES
THURSDAY, APRIL 26, 1984
P. 1, COL. 5

(P. 1 of 2)

MONDALE DIRECTS DISPUTED GROUPS TO END OPERATION

CAMPAIGN MONEY AT ISSUE

Hart Bids Rival Return Funds Raised by Committees Set Up to Elect Delegates

By BERNARD WEINRAUB
Special to The New York Times

CHATTANOOGA, Tenn., April 25 — Walter F. Mondale today ordered the termination of all independent committees set up to support delegate candidates committed to him for the Democratic Presidential nomination.

Mr. Mondale acted in the face of mounting criticism by Senator Gary Hart that the Mondale campaign was accepting funds from organized labor that might be illegal and growing evidence linking the Mondale organization with the ostensibly independent delegate committees.

"I just want to get rid of them," the former Vice President said at a news conference after visiting classes at Chattanooga State Technical Community College.

Independence Still at Issue

Mr. Mondale said he had sent telegrams to campaign officials as well as delegates asking them to "terminate" the committees that were set up in his behalf with labor funds.

The committees were set up, starting in January, when the Mondale campaign began feeling a financial squeeze. The issue of whether the committees, now totaling 127, must act independently of the Mondale campaign must still be determined by the Federal Election Commission. [Page B8.]

Mr. Hart, continuing to press his attack, said today in a speech at Vanderbilt University in Nashville it was "not good enough" for Mr. Mondale to say he would no longer accept money from the committees. "He can take one simple cleansing step," the Senator added. "He must give the money back." [Page B8.]

Mondale Plea to Kirkland

Mr. Mondale also said that on Tuesday he asked Lane Kirkland, president of the American Federation of Labor and Congress of Industrial Organizations, to halt moving political action committee funds from labor unions to the delegate groups.

Murray Seeger, chief spokesman for Mr. Kirkland, said today that the labor leader had ordered the federation's Committee on Political Education to stop contributing to the delegate committees. But Mr. Seeger added that Mr. Kirkland had no authority to order indi-

Continued on Page B8, Column 2

3504050019 3

Mondale Orders End to Special Committees for Electing Delegates

Continued From Page 1

vidual unions to discontinue such contributions.

Within the last week the issue of the delegate committees has emerged as a considerable embarrassment to the Democratic Presidential candidate. In Mr. Mondale's words, it has also deflected attention from "the matters that count."

Mr. Hart has said, in a complaint to the Federal Election Commission, that the committees of local convention delegates were set up by the Mondale organization to bypass campaign finance laws and to pour "hundreds of thousands of dollars of political action committee money" into the campaign through the supposedly independent committees. On Tuesday the Rev. Jesse Jackson, Mr. Mondale's other rival for the Presidential nomination, joined the criticism, also questioning the legality of using the funds.

Mr. Mondale and his aides vehemently denied the accusations, saying the committees were independent and beyond their control.

Mr. Jackson said today in San Antonio, Tex., that Mr. Mondale's decision to order the committees disbanded showed "good leadership."

Mr. Mondale said today that, so far as he knew, the transfer of funds from one delegate committee to another was "legal and permissible."

Insistance on Legitimacy

Mr. Mondale, who vowed that he would not accept funds from labor political action committees, has insisted over the last two days that the delegate groups were "autonomous," "independent," "legitimate," and "operating on their own." "I don't know anything about them," he said today. "I haven't been involved with them."

In his announcement, Mr. Mondale said he had instructed his campaign manager, Robert G. Beckel, "to terminate any efforts under way to create delegate committees and to terminate existing committees for purposes of raising and expending funds on their own election campaigns."

In a telegram sent to Mondale state campaign managers and to delegate committees, the candidate also said, "I appeal to you personally to accept my judgment that it is not in the best interest of my campaign for individual delegates to form or continue to operate delegate committees." He added:

"I am confident that all delegates committed to me and my entire campaign have fully complied with both the letter and spirit of Federal election law. My decision in no way suggests anything to the contrary. I am confident that the Federal Election Commission will reach the same conclusion."

Issue of Ties to Labor

The issue of the delegate committees has plainly annoyed and embarrassed Mr. Mondale because it has raised questions, voiced by Mr. Hart and others, about the former Vice President's ties to the labor federation, which has endorsed the Minnesotan's candidacy. Moreover, the issue has placed Mr. Mondale on the defensive at a time when he holds a lead of almost 2 to 1 in delegates over Mr. Hart and seems on the ascendency.

Mr. Mondale insisted today, as he did Tuesday, that he had sought vainly in recent months to halt the flow of labor political action committee funds to the committees, but that he had no control over them.

Mr. Hart charged this week that Mr. Mondale, "who had said he would never take PAC money, has a campaign which has been sustained by it since New Hampshire." Mr. Hart added, "The treasury of organized labor has become the treasury of the Mondale campaign."

Two letters, seeking an end to labor PAC contributions, preceded today's action by Mr. Mondale.

Mr. Mondale wrote to labor leaders on April 9, saying that he had asked delegate groups to "not accept political action committee contributions."

Refusal to Accept PAC Funds

An earlier letter by Mr. Beckel, on Jan. 9, was sent to delegate committee chairmen, reminding them that Mr. Mondale was refusing to accept political action committee money.

But Mr. Beckel's letter stirred some confusion because it was attached to a memorandum, signed by Elaine Kamarck, Mr. Mondale's delegate coordinator, saying that political action committee funds were legal in the formation of the delegate committees. Miss Kamarck said that although Mr. Mondale had made a decision not to accept PAC money for his campaign, "each delegate committee may make their own decision regarding PAC money."

Today, in response to a question, Mr. Mondale said that if a delegate committee failed to comply with his request, he would "find a remedy some way" to make it disband.

The Mondale campaign says it has already spent $13.3 million, or two-thirds of the legal limit as of the end of March.

Delegate committees were first authorized in the 1976 Presidential elections to spur local and grass-roots support for a Presidential candidate.

Reports at the Federal Election Committee indicate that the bulk of the funds to the Mondale delegate committees came from labor unions. The Wall Street Journal has reported that as many as 30 former Mondale staff aides were believed to have switched from the candidate's headquarters to the payrolls of the delegate committees.

THE NEW YORK TIMES
THURSDAY, APRIL 26, 1984
P. B8, COLS. 2,3,4,5

(P. 2 OF 2)

EXHIBIT J

EXHIBIT X

EXHIBIT K

Hart, Mondale Campaigns Fight To Put Problems Behind Them

By George Lardner Jr.
and David S. Broder
Washington Post Staff Writers

The campaign organizations of Walter F. Mondale and Sen. Gary Hart (D-Colo.) struggled yesterday to put their internal problems behind them and return to the offensive in the major delegate fights ahead.

Mondale, campaigning in Texas for the May 5 caucuses, tried to put the controversy over union financing of his delegate slates to rest. Hart tried to squelch persistent reports of internal dissension and rumors of an early pullout as he stumped through Indiana and Ohio, which hold primaries May 8, and Tennessee, which votes next Tuesday.

The day of maneuvering reflected the rise in tension after the temporary truce imposed by the Easter holiday. Between next Tuesday and May 8, eight states and the District of Columbia will choose 717 committed delegates, more than one-third of those needed for nomination, in the penultimate round of the marathon contest by Mondale, Hart and Jesse L. Jackson. The final burst of primaries comes on June 5.

Mondale, who issued a stop-order on the activities of his "independent" but largely union-financed delegate committees Wednesday after days of trying to defend their operations, was asked only one question on the issue yesterday—encouraging his managers to believe that he had nipped the controversy in the bud.

Mondale campaign manager Robert Beckel said, "I don't get a sense that it's cutting" into Mondale's support. Checks with Democratic leaders in four states with primaries in the next 10 days lent support to that view. In a typical comment, Indiana Democratic Chairman Jerry Miller said, "It is not getting very much attention here. I don't think it will be an issue."

But Hart and his campaign manager, Oliver (Pudge) Henkel, did their best to add fuel to the fire, unveiling a new ad on the issue and reiterating the demand that contributions to the more than 100 delegate committees that have surfaced so far be returned—a demand Mondale has rejected.

Henkel had to take considerable time out from pummeling Mondale to rebut a spate of stories about divisions in the Hart campaign.

"I can't remember a time when the campaign has been more together," Henkel said. Henkel often has been described as being at odds with Patrick Caddell, the pollster who has been a free-lance consultant to the campaign since January and who reportedly has been urging Hart to be more aggressive toward Mondale.

Reporters were invited to a Washington restaurant for a joint briefing by Henkel and Caddell, designed to set the rumors to rest, but Caddell did not arrive. Henkel said Caddell missed a plane from Columbus.

Henkel said the Hart staff was in "a very upbeat" mood because of his victories this week in the Vermont and Utah caucuses—the latter giving him one of his widest margins of the year.

The latest United Press International count showed Mondale with 1,180 of the 1,967 delegates needed for nomination while Hart had 613, Jackson 181 and others 58, with 334 uncommitted. Of the delegates still to be chosen, Mondale must win 51 percent for the nomination while Hart needs 86 percent.

Henkel offered his own set of figures, which show Mondale with a lead of 456 delegates rather than UPI's 547. He also said that Mondale's lead "will be down to about 275 delegates on May 9" and that the two main rivals will be "essentially even" on June 6, the day after California, New Jersey and three smaller states wind up the primary season.

There were no signs from the Mondale delegate committees of any strong resistance to Mondale's request that they disband, and Beckel said all known committees were "in the process of shutting down." But it was plain that their dissolution would be sluggish at best.

In Washington, for instance, the chairwoman of the Mondale Delegates—D.C. Committee, City Council member Charlene Drew Jarvis, said the committee will follow through with plans to enlist poll workers for Tuesday's primary, arrange for transportation to the polls for senior citizens and keep their telephone banks going.

The D.C. committee registered belatedly with the Federal Elections Commission Monday, reporting at this same time that it had spent about $6,500 between March 1 and April 15. Contributors included the political action committees of the American Federation of Teachers (AFT), the American Federation of State, County and Municipal Employees (AFSCME) and the AFL-CIO's Committee on Political Education (COPE).

Officials of all three labor organizations said their financing of Mondale delegate committees had stopped. The faucet began to turn off Monday after Mondale telephoned AFL-CIO President Lane Kirkland.

The number of Mondale delegate committees formally registered with the FEC, meanwhile, continued to rise, reaching 129.

Other Mondale delegate committees with primaries coming up soon also appeared to be in little hurry to close down. Otto F. Unnius, treasurer of the Montgomery County for Mondale Delegate Committee, said his group had only a "small potatoes" budget of about $5,000 and returned the only PAC money it got—a $500 contribution from the Machinists Non-Partisan Political League.

"We spent some money on rent and phones that we're sharing with" Rep. Michael D. Barnes (D-Md.), "and we have a duplicating machine. That's about it," Unnius said. "We haven't gotten together with the delegates yet to determine exactly what we're going to do. The primary [on May 8] is very close anyway."

Mondale campaign manager Beckel said he knew of no committees "that have said no," they won't shut down, but he counted the 10 in Maryland, for example, as examples of those that "are shutting down."

Mondale strategists say they do not expect the delegate committees spending to exceed $500,000. None of it has been counted, as yet, against the federal spending limit of $20.2 million that is applicable to the national Mondale campaign.

According to reports on file at the FEC, Mondale had spent $13.3 million of that amount by the end of March. Beckel guessed yesterday that "We're about at $15 million now." He said he thought the remaining $5 million would be "plenty adequate."

The Hart campaign reported spending of $7.1 million by the end of March against the ceiling. Jackson's campaign reported comparable spending of $2.1 million.

Staff researcher Maralee Schwartz contributed to this report.

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SENSITIVE

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 18, 1984

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RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

BY HAND

Michael S. Berman, Treasurer
Mondale for President Committee
Inc.
2201 Wisconsin Avenue, N.W.
Washington, D.C. 20007

Re: MUR 1667

Dear Mr. Berman:

On April 6, 1984, you were notified that the Federal Election Commission received a complaint from Americans with Hart, Inc. alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended. You were also given a copy of the complaint and informed that your response to the complaint should be submitted within fifteen days of your receipt of the notification.

On April 18, 1984, the Commission received an additional submission from the complainant pertaining to the allegations in the complaint. We are enclosing a copy of this submission.

In that the additional submission merely provides further information as to the violations alleged in the April 6, 1984 complaint, an additional fifteen days will not be accorded to respond to this matter. However, the Commission will consider any response provided to these additional materials provided the response is submitted prior to the Commission's consideration of the April 6, 1984 complaint.

If you have any questions, please contact Stephen Mims, the staff member assigned to this matter at (202)523-4143.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

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GCC
#173

AMERICANS WITH HART, INC.
507 8th STREET, S.E.
WASHINGTON, D.C. 20003

'84 APR 23 P3:05

April 18, 1984

Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20005

Re: Complaint of Americans With Hart, Inc.
v. Mondale For President Committee, Inc.,
Filed April 6, 1984, MUR 1667

Dear Commissioners:

The evidence is mounting that, without action by the Commission to halt the "delegate committee" scheme of the Mondale campaign, this massive evasion of the spending and contribution limitations of the federal election law will have a pernicious and indefensible influence on the process by which a Democratic presidential candidate is selected in the year 1984. Because the issues involved are of great consequence and public importance, a failure by the Commission to act promptly to halt this scheme -- or to declare itself powerless to act, if that is the Commission's decision -- threatens the very integrity of the political process and public confidence in the federal election laws.

Since the Complaint was filed, there is further evidence, including statements of Mondale campaign officials, that the "delegate committees" are an integral part of

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the Mondale campaign financing plan, that such committees do not act "independently" of the Mondale campaign and that such committees are the vehicles by which hundreds of thousands, and potentially millions, of dollars are being funneled into the Mondale campaign in complete disregard of the limitations of the Federal Election Campaign Act of 1971, as amended ("the Act"). This case demands prompt action by the Commission. */

I. Additional Information Further Demonstrates That the Mondale Delegate Committees Are An Integral Part of the Mondale Campaign.

Subsequent to the time that the Complaint was filed on April 6, 1984, additional statements by Mondale campaign officials have become known, which further evidence that such Mondale "delegate committees" are not "independent" of the Mondale campaign but, on the contrary, are an integral part of the Mondale campaign. Indeed,

*/ We are writing in response to the General Counsel's letter to me dated April 10, 1984, in which the Commission stated that the Complaint in this matter was being analyzed by a Commission staff member and that, if we received additional information bearing on the Complaint, it should be submitted to the Commission. The General Counsel, by separate letter dated April 12, 1984, also stated that our request to shorten the time for Mondale For President Committee, Inc., to respond was denied due to the fact that the statute 2 U.S.C. § 437g(a)(1), and Section 111.6 of the Commission's regulations, provide a 15-day period within which the Mondale for President Committee Inc., should be permitted to respond before action may be taken by the Commission on the Complaint. The response by the Mondale campaign should be filed on April 23, 1984, which will remove the procedural impediment to effective action by the Commission. We urge the Commission to act promptly thereafter.

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it appears that the Mondale campaign has begun to use these delegate committees to take over wholesale entire sections of the Mondale campaign -- specifically, its field organizations.

For example, The Washington Post on April 11, 1984 (p. A8) (Exhibit A accompanying this letter), reported from Philadelphia about the Mondale "delegate committees" that

> "The committees are a new device used by the former vice president in several states this year to raise and spend money without its counting against his federal spending limits. In Pennsylvania, however, he appears to have taken a giant step by using the committees to take over entire sections of his campaign for the Democratic presidential nomination.
>
> "While the official Mondale campaign orchestrated Mondale's Pennsylvania commercials and tracking polls out of a 14th-floor hotel suite, the delegate committees were in the streets, running the get-out-the-vote operation, printing and distributing most campaign handouts and negotiating with key ward leaders, central figures in Pennsylvania politics."
>
> * * *
>
> "Mondale has been in danger of bumping into the [spending] ceiling -- he has spent about $17 million with 16 more primaries and caucuses to go -- and delegate committees were used in Illinois and Florida to raise money separate from the campaign. Mondale officials contend that the practice is entirely legal.
>
> "They expect delegate committees to play an important role in the June 5 California primary and in a host of caucuses and primaries in smaller states, including Utah, South Dakota, New Mexico and West Virginia, where the Mondale campaign wants to limit spending.

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"Committees also 'may pop up' in such central battleground states as Ohio, New Jersey, Texas, Indiana and North Carolina, according to aides.

"A total of 92 delegate committees in 12 states have registered with the FEC. At least $250,000 has flowed through them and the amount is growing rapidly." (Emphasis added.)

But such delegate committees do not "pop up" spontaneously. They have been actively promoted by the Mondale campaign, as demonstrated in the Complaint. This is further evidenced by a report in The Washington Post on April 14, 1984 (p. A8) (Exhibit B accompanying this letter), that there had been a memorandum as early as January 12, 1984, from the Chief Delegate Coordinator of the Mondale campaign, Ms. Elaine Kamarck, urging the formation of delegate committees. The report states:

"Addressed to all 'Mondale delegates,' the memo said they could 'form committees. . .to raise and expend money to support their candidacies' and then offered 'a brief outline on how these committees should work,' including how to raise money.

"Solicit local organizations to which you may belong for contributions,' the memo advised, adding:

"IMPORTANT NOTE: Contributions by corporations, labor unions, foreign nationals and federal contractors are not permitted. But contributions from Political Action Committees of issue groups or labor unions are permitted."

* * *

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> "Kamarck also advised that as far as spending on permitted campaign materials was concerned, 'there are no requirements as to the amount of space which must be devoted to the delegate-candidates versus the amount of space devoted to Mondale.'" (Emphasis added.)

It is increasingly obvious from these reports and from filings with the Commission by delegate committees, in combination with the reports accompanying the original Complaint in this matter, that the "delegate committees' are an integral part of the Mondale campaign and have assumed a major role in the overall campaign expenditure plan and that the Mondale campaign initiated and organized these "delegate committees". If these "delegate committees" continue to proliferate in disregard of the Act and the Commission's regulations, 11 C.F.R. § 110.14(e), they could have a significant influence on the elections notwithstanding their lack of independence from the Mondale campaign.

II. There Is Further Evidence That The Primary Purpose of the Mondale Delegate Committees Is to Promote the Mondale Candidacy.

As shown in the Complaint, at least some significant amount of the expenditures by the Mondale delegate committees emphasize the Mondale candidacy and pay scant attention to individual delegates. Further evidence from materials in

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the Wisconsin primary is included in the materials in Exhibit C accompanying this letter. In such materials, no effort was made to distinguish between campaign literature of the Mondale campaign and campaign literature of the so-called "At-Large Delegate Mondale Committee."

As shown in Exhibit C accompanying this letter, handbills called "Good Idea vs. 'New Ideas'" appeared in identical form and were either (a) "Paid for by Mondale For President, Inc." or (b) "Paid for by At-Large Delegate Mondale Comm., Rick Asplund, Treas." Identical material published by the official Mondale committee and the "At-Large Delegate Mondale Committee" (also included in Exhibit C) also appeared in handbills entitled "Mondale -- Student Interests vs. Special Interests." */ There is no information in these handbills concerning any Mondale delegates. **/

*/ The only differences in the handbills is that those published in the At-Large Delegate Mondale Committee added the words "Caucus April 7."

**/ Also in Exhibit C is a "Dear Friend" letter signed by the Governor of Wisconsin which advocates the Mondale candidacy and does not mention any individual delegates. This letter also is "Paid for By At-Large Delegate Mondale Comm., Rick Asplund, Treas."

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Similarly, Mondale "delegate committee" materials advocating the Mondale candidacy are turning up elsewhere in areas of the United States not before known to have "delegate committees" for Mondale. These materials emphasize the Mondale candidacy. For example, in the District of Columbia, a handbill on behalf of "Mondale Delegates -- D.C. Committee" (Exhibit D to this letter), while it contains some information about Mondale delegates, puts its primary emphasis on the candidacy of Mr. Mondale for President. */

It is clear that at least in many instances Mondale delegate committees -- which have been told by the Mondale campaign, as we have noted, that it does not matter how much space is devoted to delegates and how which space is devoted to Mr. Mondale -- are emphasizing the candidacy of Mr. Mondale and are mentioning individual delegates only secondarily, when at all.

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*/ Further evidence of the Mondale campaign's connection with the Mondale "delegate committees" is provided by the comments of Mr. Ed Rendell, Chairman of the Pennsylvania Delegates At-Large Committee, who is reported by The Washington Post on April 11, 1984, to have said (Exhibit A):

> "Rendell said the at-large committee has offices here and in Pittsburgh with a total staff of eight, all of whom were picked up from the Mondale campaign when it ran into cash difficulties after the New Hampshire primary.
>
> "Other delegate committees reportedly have hired other laid-off Mondale workers." (Emphasis added.)

III. Failure of the Commission to Act Would Seriously Erode the Confidence of the Public In the Campaign Spending Laws.

For reasons we have indicated in the Complaint, we believe that the resolution of the issues raised by the Complaint are, in important respects, simple and clear cut. Specifically, we urge that the Commission should promptly take steps to reaffirm the meaning of its regulations concerning delegates and delegate committees set forth in 11 C.F.R. § 110.14, which permits individual delegates, but not delegate committees, to engage in expenditures for certain campaign materials which, even though they mention the Mondale candidacy, do not constitute in-kind contributions to the Mondale campaign. */

The General Counsel of the Commission by letter dated April 12, 1984, indicated that the Commission was unable under the statute to take any action on the Complaint before the Mondale campaign was given a 15-day period to respond. Once that period expires, however, the Commission may act, and it should do so promptly.

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*/ When such expenditures are made by delegate committees, they are subject to the normal "independent expenditures" test. As we have shown, the expenditures by Mondale delegate committees do not satisfy the "independent expenditures" test.

The Mondale campaign is not entitled to any special consideration or further delays before the Commission takes action to stop the "delegate committee" scheme. For reasons stated in the Complaint, we believe that the "delegate committee" scheme plainly is inconsistent with the Commission's regulations. But even if there were an ambiguity in such regulations, there was the vehicle of a request for advisory opinion which was available to the Mondale For President Committee, Inc., to resolve such ambiguities. The Mondale campaign did not request an advisory opinion, even though this "delegate committee" scheme was conceived prior to January 12, 1984, when according to press reports (Exhibit B) instructions were being issued by Mondale headquarters for the setting up of such committees.

The Commission's procedures are mocked if the Mondale campaign can use procedural delay to thwart decision until after the elections simply by alleging some ambiguity in the Commission's regulations which an advisory opinion would have clarified. If the Commission is powerless to stop a continuing violation in these circumstances, there is a serious danger that the public -- and future candidates --

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will be convinced that the Commission is not capable of carrying out the purposes of the Act.

For these reasons, and those stated in the Complaint, we respectfully urge that the Commission act as promptly as possible after April 23, 1984, to resolve this matter and to take effective action before the passage of time and events renders the Commission's role meaningless.

Respectfully submitted,

Americans with Hart, Inc.

by _____
John M. Quinn
General Counsel

Complainant

8504050207

VERIFICATION

Washington)
) ss
District of Columbia)

John M. Quinn, being duly sworn, deposes and says that he is the general counsel of Americans With Hart, Inc., and is authorized on its behalf to submit the accompanying letter to the Federal Election Commission, that the exhibits included as Exhibits A and B accompanying this letter are true and accurate copies of newspaper reports appearing in The Washington Post on the dates indicated, and that the campaign materials in Exhibits C and D accompanying this letter, to the best of his knowledge and belief, are true and accurate copies of campaign materials distributed within the state of Wisconsin (Exhibit C) and within the District of Columbia (Exhibit D) by the organizations whose names appear on such materials.

John m. Quinn
John M. Quinn

Subscribed and sworn to before
me this 11th day of April, 1984.

Marsha A. Vaillancourt
Notary Public

My Commission Expires October 31, 1988

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of the Complaint of Americans With Hart, Inc. Complainant, -against- Mondale For President Committee, Inc. Respondent.	:	MUR 1667

EXHIBITS TO LETTER OF
AMERICANS WITH HART, INC.
DATED APRIL 18, 1984

ATTACHMENT A

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Mondale Delegate Groups Get Out the Votes, Line Up the Leaders

By Thomas B. Edsall
Washington Post Staff Writer

PHILADELPHIA, April 10—Walter F. Mondale's organization has found another fruitful use for union-financed "delegate committees," giving them responsibility for basic, grass-roots political activity in the Pennsylvania campaign that ended triumphantly today.

The committees are a new device used by the former vice president in several states this year to raise and spend money without its counting against his federal spending limits. In Pennsylvania, however, he appears to have taken a giant step by using the committees to take over entire sections of his campaign for the Democratic presidential nomination.

While the official Mondale campaign orchestrated Mondale's Pennsylvania commercials and teaching polls out of a 14th-floor hotel suite, the delegate committees were in the streets, running the get-out-the-vote operation, printing and distributing most campaign handbills and negotiating with key ward leaders, control figures in Pennsylvania politics.

"It's a very interlocked campaign," said Joseph Trippi, Mondale's Pennsylvania campaign manager. "It's a very new way of doing it. It's really tough trying to figure out what's going on."

Sen. Gary Hart (D-Colo.) has complained to the Federal Election Commission that Mondale's use of delegate committees is a violation of federal law and that their spending should be counted against a $22 million ceiling permitted candidates before nomination.

Mondale has been in danger of bumping into the ceiling—he has spent about $17 million with 16 more primaries and caucuses to go—and delegate committees were used in Illinois and Florida to raise money separate from the campaign. Mondale officials contend that the practice is entirely legal.

They expect delegate committees to play an important role in the June 5 California primary and in a host of caucuses and primaries in smaller states, including Utah, South Dakota, New Mexico and West Virginia, where the Mondale campaign wants to limit spending.

Committees also "may pop up" in such central battleground states as Ohio, New Jersey, Texas, Indiana and North Carolina, according to aides.

A total of 92 delegate committees in 15 states have registered with the FEC. At least $200,000 has flowed through them and the amount is growing rapidly.

Mondale officials estimated that the 24 committees in Pennsylvania may have channeled at least $100,000 into support for Mondale, equal to more than a third of the $250,000 the official Mondale campaign expected to spend.

The most important of the 24 is the Pennsylvania Delegates At-Large Committee, whose members include Philadelphia Mayor W. Wilson Goode, Pittsburgh Mayor Richard S. Caliguiri, Erie Mayor Lee Tullo and Philadelphia District Attorney Ed Rendell, its chairman. It has raised at least $47,000, including $40,000 from union political action committees (PACs).

The other 23 committees operate in the state's 23 congressional districts and spend amounts ranging from $800 to $10,000, according to Diane Thompson, executive director of the at-large committee.

Trippi said the official Mondale campaign and delegate committees have been conducting "two essentially totally separate operations.

"What they are doing is essentially the politics of lining up ward leaders," he said.

"They do the palm cards [showing who Mondale's delegates are], they deal with local ward leaders, they knock on doors, they do most of the signs you see .... The delegate committees are essentially doing get-out-the-vote."

Thompson described the differences more succinctly:

"Trippi and the Mondale for President [Committee] are more with the electronic media. This is the grass roots."

The delegate committees are far more visible than the official campaign.

The at-large committee is housed in the same first-floor downtown office space used by the Carter-Mondale campaign in 1980. Mondale signs in the windows have small print saying they were paid for by the at-large committee.

Fourteen stories up in the next-door Bellevue Stratford Hotel, the official Mondale campaign operates out of an anonymous suite.

Trippi said the allocation of grass-roots responsibility to the delegate committees "lets me up. I don't have to spend so much time trying to cut deals with ward leaders."

In Philadelphia, the 69 ward leaders are key players in the political process.

They generally control the district (or precinct) committee men and women who in turn control most Democrats passed out to voters going to the polls.

"I'd say right now there are probably 35 ward leaders carrying essentially Mondale slates, about 20 to 21 carrying Jesse Jackson slates and about six or seven carrying Hart slates," Trippi said. "That alone ought to destroy Hart."

Rendell said the at-large committee "has offices here and in Pittsburgh with a total staff of eight, all of whom were picked up from the Mondale campaign when it ran into cash difficulties after the New Hampshire primary.

Other delegate committees reportedly have hired other hold-off Mondale workers.

Rendell said the major unions providing support to the committee included the United Auto Workers, the iron workers and the American Federation of State, County and Municipal Employes.

He said that at Mondale's request, the delegate committee has stopped soliciting union PACs, but the delegate committees will continue to solicit money from individuals to help pay the costs of going to the Democratic National Convention in San Francisco.

EXHIBIT A

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Jan. 12 Memo to Delegate Groups

PAC Money Approved for Mondale Race

By George Lardner Jr.
Washington Post Staff Writer

Walter F. Mondale's chief delegate coordinator gave Mondale delegates permission three months ago to form committees to solicit contributions from political action committees and special-interest groups, although the former vice president has said his campaign would not accept such money.

Chief delegate coordinator Elaine Kamarck made clear in a memorandum Jan. 12 to all of Mondale's delegates that they need feel no restraints on accepting such funds.

More than 100 Mondale "delegate committees" have been formed in recent weeks to avoid federal spending limits on his national Democratic presidential campaign organization. Campaign advisers to his chief rival, Sen. Gary Hart (D-Colo.) have asked the Federal Election Commission to declare the device illegal.

The issue of money from political action committees and special-interest groups is one of the most sensitive for Mondale, who has been accused by Hart and former candidate Sen. John Glenn (D-Ohio) of being beholden to organized labor and special-interest groups.

Last year, Mondale renounced PAC money hours after Hart did. When the delegate committees' fund-raising came to light last month, with many of the donations from union PACs, Mondale campaign officials said they had tried to discourage such contributions but were powerless.

"There's not a lot we can do about it," Mondale campaign manager Bob Beckel said two weeks ago. "Mondale doesn't like it and I don't like it .... We have no right to go to the labor unions and tell them not to spend their money."

David Iiskin, legal counsel to the Mondale campaign, said Mondale had tried to discourage delegate committees from accepting PAC money.

The Kamarck memo, dated about the time Mondale delegate slates were being registered in Illinois, suggests no such disapprobation. A copy was obtained by The Washington Post.

Addressed to all "Mondale delegates," the memo said they could "form committees ... to raise and expend money to support their candidacies" and then offered "a brief outline on how these committees should work," including how to raise money.

"Solicit local organizations to which you may belong for contributions," the memo advised, adding:

"IMPORTANT NOTE: Contributions by corporations, labor unions, foreign nationals and federal contractors are not permitted. But contributions from Political Action Committees of issue groups or labor unions are permitted.

"Individuals and Political Action Committees can contribute up to $5,000 to a delegate committee. Walter Mondale has made a decision not to accept money from P. A. C.'s for his campaign. Each delegate committee may make their own decision regarding P. A. C. money."

Kamarck also advised that as far as spending on permitted campaign materials was concerned, "there are no requirements as to the amount of space which must be devoted to the delegate-candidates versus the amount of space devoted to Mondale."

Mondale delegate committees were considered a major factor in funding his campaign in Illinois, where he defeated Hart, 41 to 26 percent, in the March 30 primary election. Hart's campaign has complained to the FEC about Mondale's funding in that state and elsewhere where such committees have been formed.

Beckel said he had not been aware of her memo until a report brought to his attention last night. He acknowledged that it had a permissive tone which he called "regrettable."

Beckel said that, by coincidence, he had sent a letter Jan. 12 to some "delegate expenditure committee treasurers" then organizing in New Hampshire and "urged them not to take PAC contributions."

Staff researcher Maralee Schwartz contributed to this report.

EXHIBIT C

8504050214

GOOD IDEAS vs. "NEW" IDEAS

MONDALE KNOWS THE DIFFERENCE



NUCLEAR ARMS CONTROL

MONDALE: Endorsed the Nuclear Freeze when it was first introduced in March, 1982. Opposed the Cohen-Nunn Build-Down (supported by the Reagan Administration) because it would sidetrack the freeze.

HART: Waited for 18 months to endorse the freeze. Original co-sponsor to the Cohen-Nunn Build-Down, which calls for building newer, more dangerous nuclear weapons to replace older ones.

OIL COMPANY PROFITS

MONDALE: Led the winning fight for the '80 Windfall Profits Tax so that oil companies would pay their fair share. Opposed the surtax on imported oil. Proposes a 10% minimum income tax on all companies.

HART: One of only 8 Democratic Senators who voted against the '80 Windfall Profits tax. Voted against an '81 proposal to increase the windfall profits tax on newly discovered oil and use it to create a reserve fund for Social Security. Now proposes a $10/barrel surtax on imported oil, costing the average family over $140/year.

HOSPITAL COSTS

MONDALE: Leading supporter of hospital cost containment legislation, a measure demonstrating Mondale's commitment to senior citizens, the chronically ill, and low-income Americans.

HART: Has refused to co-sponsor current Kennedy-Gephardt hospital containment bill (similar to Mondale plan).

JOBS

MONDALE: Led the winning fight for the successful Chrysler loan guarantee. Supports benefits and job training for the unemployed.

HART: Opposed the Chrysler loan. Voted twice against extended unemployment benefits. Voted against restoring Reagan cuts in benefits and job training for workers disby imports.

JOB SAFETY

MONDALE: Strong and consistent supporter of job-safety regulations for tough safeguards against toxic substances.

HART: Introduced legislation in 1981 to limit liability of the Colorado-based Johns-Manville company for asbestos-related diseases among its workers. Also voted against job-safety regulations.

STUDENT FINANCIAL AID

MONDALE: Has always supported student assistance. Pledges to restore Reagan cuts--and expand Federal funds for undergraduates and graduates.

HART: Cast the deciding vote in (Sept.'80) against the reauthorization of all Federal spending for higher education and student assistance because he thought funding levels were too high. Bill was then stripped of $1.5 billion for guaranteed student loans before becoming law.

LOOK BEYOND THE SLOGANS TO THE ISSUES...VOTE

MONDALE

Paid for by Mondale for President, Inc.

Labor Donated

GOOD IDEAS vs. "NEW" IDEAS

MONDALE KNOWS THE DIFFERENCE



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CAUCUS APRIL 7

LOOK BEYOND THE SLOGANS TO THE ISSUES...VOTE

MONDALE

Paid for by At-Large Delegate Mondale Comm. Rick Asplund, Treas

Labor Donated

MONDALE

STUDENT INTERESTS vs SPECIAL INTERESTS

IN 1980, OUR LEADERS WERE GIVEN A CHOICE BETWEEN THE PUBLIC INTEREST AND THE SPECIAL INTERESTS --- AND STUDENTS GOT SHAFTED...

FIRST, THE OIL COMPANIES.

- FRITZ MONDALE ADVOCATED A WINDFALL PROFITS TAX ON OIL COMPANIES TO RAISE $227 BILLION BY 1990.
- GARY HART WAS ONE OF ONLY 8 DEMOCRATIC SENATORS TO VOTE AGAINST THE TAX --- AND LET THE OIL COMPANIES OFF THE HOOK.

THEN, THE STUDENTS.

- LATER THAT YEAR FRITZ MONDALE SUPPORTED HR 5192 FOR FISCAL '81-85 REAUTHORIZING ALL FEDERAL SPENDING FOR HIGHER EDUCATION, INCLUDING FUNDS FOR STUDENT FINANCIAL AID.
- THE BILL LOST BY JUST ONE VOTE IN CONFERENCE COMMITTEE --- AND GARY HART'S "NO" WAS DECISIVE. THEN THE PACKAGE WAS STRIPPED OF $1.5 BILLION FOR GUARANTEED STUDENT LOANS.

GARY HART DIDN'T THINK WE COULD AFFORD TO FOOT THE FULL BILL FOR EDUCATIONAL OPPORTUNITY -- NOR DID HE THINK THAT OIL COMPANIES COULD AFFORD A FAIR BILL FOR THEIR TAXES. HART MADE HIS CHOICE: THE OIL COMPANIES OVER STUDENTS; THE SPECIAL INTERESTS OVER THE PUBLIC INTEREST.

FRITZ MONDALE MADE THE RIGHT CHOICES. HE KNOWS STUDENT AID MEANS OPPORTUNITY. HE'LL RESTORE THE CUTS -- AND INVEST IN EDUCATIONAL EXCELLENCE AT ALL LEVELS.

MONDALE KNOWS THE STUDENT INTEREST IS THE PUBLIC INTEREST!!!

VOTE STUDENT VOTE MONDALE

Labor Donated

Paid for by Mondale for President, Inc.

MONDALE

EXHIBIT C
Page 4 of 5

STUDENT INTERESTS vs SPECIAL INTERESTS

IN 1980, OUR LEADERS WERE GIVEN A CHOICE BETWEEN THE PUBLIC INTEREST AND THE SPECIAL INTERESTS --- AND STUDENTS GOT SHAFTED...

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• • • •

AT-LARGE DELEGATE MONDALE COMMITTEE

Gov. Anthony Earl
Lt. Gov. James Flynn
Ada Deer
Ruth Clusen

EXHIBIT C
Page 5 of 5

Dear Friend,

I'm writing to urge your support for a good, long-time friend of Wisconsin — Walter Mondale.

Since last summer's State Democratic Convention, Walter Mondale has been back to Wisconsin four times to ask for our help in becoming president. His frequent visits demonstrate his commitment and his ties to our state.

More than any other candidate for president, Fritz Mondale understands the problems we face in the midwest. He knows that our region has been hit harder than most by the Reagan recession, which has purchased lower inflation with high unemployment, idle plants and small business and farm failures.

Walter Mondale has his roots in the midwest. Minnesota, like Wisconsin, has been the birthplace of good, solid, progressive government. We know what kind of sensible, experienced leader Walter Mondale will be.

We should measure politicians not by what they promise, but by how they have performed. I ask you to consider Walter Mondale's record of support for women, the elderly, farmers, the poor and disadvantaged, and the working people of this country. Throughout his career in public life, Walter Mondale has worked to find pragmatic solutions to the real problems we face. He deserves our strong support.

Walter Mondale is a good, solid Democrat who fights for what he believes in and doesn't apologize for it.

And yet questions are raised.

"Is Mondale the captive of the Special Interests?" Only if senior citizens, teachers, farmers, working people and just about everyone else who's not a privileged member of the Reagan Elite can be called "special interests."

Or, **"Isn't Mondale a candidate of the past?"** What "past?" The past of FDR? Truman? Kennedy? Some of their "old ideas" still work today and form the basis of our Democratic philosophy.

This isn't a campaign of "old" versus "new" or "past" versus "future." It is a campaign to determine which Democratic candidate has the experience, the commitment and the strength to defeat President Reagan this fall.

We must nominate our best candidate.

I believe our best candidate is Walter Mondale. Please, support this friend of Wisconsin in the Primary Election on Tuesday, April 3rd and during the district caucuses on Saturday, April 7th.

Thank you.

Sincerely,

Tony Earl
GOVERNOR

Paid for by At-Large Delegate Mondale Comm. Rick Asplund Treas.

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8504050220

EXHIBIT D

EXHIBIT D
Page 1 of 2

Place Stamp Here

Mondale for President
D.C. Delegates Committee
1200 Massachusetts Avenue, N.W.
Washington, D.C. 20005



Mondale Delegates — D.C. Committee
1200 Massachusetts Avenue, N.W.
Washington, D.C. 20005

Vote Walter Mondale — Tuesday, May 1

How You Can Help Walter Mondale

On Tuesday, May 1, 1984, all registered Democrats in the District of Columbia may vote in the Presidential Preference Primary. You can cast your ballot for Walter Mondale and choose Mondale Delegates to the Democratic National Convention.

If you live in Ward 1, 2, 6 or 8, you'll vote the ballot for Congressional District #1. You may vote for Walter Mondale and up to 6 Mondale Delegates —

— up to 3 women:	and up to 3 men:
Betty Ann Kane	Bernard Demczuk
Virginia Johnson	Roman Bukowinsky
Carol Ridker	Paul Greenberg
Jane Pierson McMichael	Paul Kuntzler
Linda G. Ginenthal	L. Page "Deacon" Maccubbin
Judith E. Beale	Robert Evans Love
Grace Malakoff	Phinis Jones
Althea Minor	William Saunders
Helen Marek	Neil S. Buckmon

If you live in Ward 3, 4, 5 or 7, you'll vote the ballot for Congressional District #2. You may vote for Walter Mondale and up to 8 Mondale Delegates —

— up to 4 women:	and up to 4 men:
Charlene Drew Jarvis	William H. Simons
Anne Howard	William R. Spaulding
Shari Kharasch	Marchel Smiley
Janette Hoston-Harris	James W. Baldwin
Sharon Pratt Dixon	Leonard C. Ball
Barbara P. Van Blake	William R. Riggs
Victoria Street	Arthur Taylor
Diane Flanagan-Montgomery	William J. Otwell
Ruby Huntley	Joseph L. Jackson
Carol Anderson	James E. Nathanson
Jan Welch	William O. Woodson
Carolyn W. Ricanek	Francis Threadgill





An Important Message About Walter Mondale and You

We are your friends and neighbors, seeking election as Delegates for Mondale in the Democratic Presidential Preference Primary on Tuesday, May 1, 1984. We support Walter Mondale because he has been a good neighbor and friend of all District of Columbia citizens.

- Walter ("Fritz") and Joan Mondale and their children have lived in D.C. for 20 years.
- The Mondales have been active participants in their neighborhood, in projects such as a community food co-op. They have vigorously championed academic excellence in our public schools.
- Walter Mondale co-sponsored the District of Columbia Home Rule Act.
- Walter Mondale has campaigned in state legislatures across the country for passage of our Voting Rights Act for District of Columbia citizens.

It's time to elect a President who is sensitive to the needs of District of Columbia citizens — who understands the diverse fabric of our community.

Walter Mondale cares. His children have attended D.C. public schools. His wife, Joan, has worked to win support for the arts in this city.

For 20 years, Walter Mondale has stood up for the District of Columbia. Now we're standing up for Walter Mondale for President. Please stand with us.

On Tuesday, May 1, 1984, vote for your friend and neighbor Walter Mondale and for Mondale Delegate candidates.

You Can Help Walter Mondale Now

You can also help right away by finding more friends and neighbors to support Walter Mondale and the Mondale Delegate candidates in your own precinct.

You can be part of a program that will have a major impact on Walter Mondale's campaign in the District of Columbia by joining

FIVE FOR FRITZ

It's easy. Just . . .

A. Find four friends, relatives or neighbors who support Walter Mondale and the Mondale Delegate candidates (you are the fifth).

My ward is #_____ My precinct is #_____

My polling place is _____

B. Fill in the names, addresses and phone numbers of four new Mondale supporters in the spaces below.

1. Name _____
   Address _____
   _____
   Phone _____
2. Name _____
   Address _____
   _____
   Phone _____
3. Name _____
   Address _____
   _____
   Phone _____
4. Name _____
   Address _____
   _____
   Phone _____
5. Your name _____
   Address _____
   _____
   Phone _____

Please mail this card today! Thank you.

PERMIT D
Page 2 0 2 3

Paid for by the Mondale Delegates — D.C. Committee, a copy of our report is filed with the Federal Election Commission

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 18, 1984

BY HAND

Michael S. Berman, Treasurer
Mondale for President Committee
Inc.
2201 Wisconsin Avenue, N.W.
Washington, D.C. 20007

Re: MUR 1667

Dear Mr. Berman:

On April 6, 1984, you were notified that the Federal Election Commission received a complaint from Americans with Hart, Inc. alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended. You were also given a copy of the complaint and informed that your response to the complaint should be submitted within fifteen days of your receipt of the notification.

On April 18, 1984, the Commission received an additional submission from the complainant pertaining to the allegations in the complaint. We are enclosing a copy of this submission.

In that the additional submission merely provides further information as to the violations alleged in the April 6, 1984 complaint, an additional fifteen days will not be accorded to respond to this matter. However, the Commission will consider any response provided to these additional materials provided the response is submitted prior to the Commission's consideration of the April 6, 1984 complaint.

If you have any questions, please contact Stephen Mims, the staff member assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

8504050023

MUR ASSIGNMENT FORM

MUR # 1667

Date Received April 6, 1984

COMPLAINANT Americans With Hart, Inc.
by John M. Quinn, Counsel

RESPONDENT Mondale for President
Committee, Inc.

TRACK ASSIGNED Track III

FINAL REVIEW BY: A.G.C. G.C.

STAFF ASSIGNED Thomas (Jones)

DATE 4/6/84

DUE DATE OF FIRST G.C. REPORT 12 day / 20 day

KLG
Signature of G.C.

4/6/84
date

Please return to Docket after assignment.

8504050024

Michael S. Berman, Treas.
Mondale for President Cmte, Inc.
2201 Wisconsin Avenue, NW
Washington, DC 20007

the Cmte & you, as
treas,

Check #1667

85040500225

1667

ROUTING SLIP

___ Improper Complaint ltr.

___ No Jurisdiction ltr.

1 Respondent Notification ltr.

___ Complainant Notification ltr.

___ Other:

To KS from BJ on 4/6/84 for signature

To Docket from [illegible] on 4/6 for mailing

8504050022 6

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 6, 1984

BY HAND

Michael S. Berman, Treasurer
Mondale for President Committee,
Inc.
2201 Wisconsin Avenue, N.W.
Washington, D.C. 20007

Re: MUR 1667

Dear Mr. Berman:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint which alleges that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against the committee and you, as treasurer, in connection with this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

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If you have any questions, please contact Stephen Mims, the staff member assigned to this matter at (202) 523-4143. 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

8504050022 9

Docket 1667
Expedited

ROUTING SLIP

___ Improper Complaint ltr.

___ No Jurisdiction ltr.

___ Respondent Notification ltr.

1 Complainant Notification ltr.

___ Other:

To BD from KH on 4/10/84 for signature

To Docket from [illegible] on 4/10 for mailing

8504050022 9

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 10, 1984

Mr. John M. Quinn
General Counsel
507 Eighth Street, S.E.
Washington, D.C. 20003

Dear Mr. Quinn:

This letter is to acknowledge receipt of the complaint of your client, Americans with Hart, Inc., which we received on April 6, 1984, against Mondale For President Committee, Inc. which alleges violations of the Federal Election Campaign laws. A staff member has been assigned to analyze your allegations.

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. If you have any questions, please contact Cheryl Thomas at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

8504050230

MUR 1667

OGC #3046

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of the Complaint of	
Americans With Hart, Inc.	
Complainant,	
- against -	
Mondale For President Committee, Inc.	
Respondent.	

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COMPLAINT PURSUANT TO PART 111 OF THE COMMISSION'S REGULATIONS

Complainant Americans With Hart, Inc., seeks urgent relief from the Commission to halt an emerging pattern of actions by the Mondale for President Committee, Inc., and others which threaten a massive evasion of the Federal Election Campaign Act of 1971, as amended, and the Commission's regulations limiting campaign contributions and expenditures. The conduct in issue involves the concerted establishment of so-called "delegate committees" engaged in activities -- the receipt of contributions and the making

of expenditures -- to promote the election of Mr. Mondale for President. As indicated by the exhibits attached to this Complaint, these committees further an overall plan formulated and developed by the Mondale For President Committee and its affiliated state committees.

By suggesting that the delegate committees are somehow "independent" of Mr. Mondale's campaign, this delegate committee scheme (a) seeks improperly to evade the expenditure limitations to which the Mondale campaign is subject in particular states and for the nation as a whole and (b) encourages multi-candidate committees (so-called PACs) and other persons to make -- and the Mondale campaign to accept -- contributions in excess of those permitted by law. 11 C.F.R. § 110.1 and § 110.2. Moreover, since these committees are set up by the same group of persons, they are affiliated with one another and their expenditures on behalf of the Mondale candidacy, which constitute in-kind contributions to the Mondale campaign, are limited to $1,000 in the aggregate. 11 C.F.R. §§ 110.3(a)(1)(i), 110.3(a)(1)(ii)(E),

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100.5(g), 110.1. There is little pretense that this limitation is being complied with.

It is no defense to argue that the expenditures in question are by "delegate committees" which somehow are exempt from the limitations applicable to other political committees because they involve "delegates." Commission regulations distinguish between expenditures permitted by an individual delegate, 11 C.F.R. § 110.14(d), and those sanctioned by a delegate committee, 11 C.F.R. § 110.14(e). Under the plain language of the regulations, delegate committees are subject to the same rules as any other political committee which advocates the election of a particular presidential candidate.

As described below, it is reasonable to conclude that violations of the contribution limitations are occurring almost daily as a result of the Mondale campaign's "delegate committee" scheme. For this reason, we urge that the Commission take urgent steps to rule on this matter.

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First, we request that the Commission or its general counsel forthwith issue a simple statement that the provisions of 11 C.F.R. § 110.14(d) entitled "Expenditures By Delegates" are applicable only to individual delegates and not to delegate committees. This alone may arrest many of the practices outlined in this Complaint which we submit are not consistent with the statute and the Commission's regulations. If such practices nevertheless continue, we urge that the Commission, without delaying to await a response from respondents as to past violations, determine immediately that the Mondale campaign is about to violate the Act and authorize the Commission's general counsel to seek injunctive and declaratory relief in court under 2 U.S.C. § 437d(a)(6).

Second, as to past violations, we request that the Commission take prompt steps to initiate proceedings (a) by acting immediately to determine under 11 C.F.R. § 111.5 that this Complaint is in compliance with the technical requirements of 11 C.F.R. § 111.4 and otherwise to complete the initial processing of the Complaint, (b) by requiring that respondent submit within five days a response setting

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forth the reasons, if any, why the Commission should not act on this Complaint and (c) by thereafter as promptly as possible:

(i) finding and declaring that the practices outlined herein have been in violation of the statute, 2 U.S.C. § 441a(a), and the Commission's regulations dealing with delegate committees and other political committees, 11 C.F.R. § 110.14(e) and 11 C.F.R. § 110.1;

(ii) setting down an expedited investigation to ascertain, as rapidly as possible and in any event not later than four weeks before the end of the primary phase of the 1984 election year, or on or about May 8, 1984, what expenditures by the Mondale delegate committees are properly assigned to the expenditures limitations to which the Mondale campaign are subject; and

(iii) establishing a further investigation of what action should be taken where violations are found to result from contributions to the Mondale campaign and the so-called "independent" Mondale delegate committees in excess of contribution limitations, 2 U.S.C. § 441a(a), either by

8504050023 5

persons and multi-candidate committees to so-called "independent" delegate committees or by those same delegate committees to the Mondale campaign through expenditures which constitute in-kind contributions to the Mondale candidacy.

Urgent action is warranted. The "delegate committee" scheme of the Mondale campaign has already operated on a large scale in connection with the Illinois primary, the New York primary and the Pennsylvania primary and will be a significant element of the remaining primary contests in other states unless the Commission acts. The violations involved are serious -- newspaper reports indicate that hundreds of thousands of dollars are being funneled into the Mondale campaign through this scheme in disregard of the dollar limitations of the Federal Election Campaign Act -- and they are continuing. Unless the Commission acts immediately, the Mondale "delegate committee" scheme will compromise the integrity of the political process and undermine the purposes of the Federal Election Campaign Act.

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I. THE "DELEGATE COMMITTEE" SCHEME OF THE MONDALE CAMPAIGN FLATLY VIOLATES THE APPLICABLE STATUTE AND REGULATIONS.

A. Public Statements By Officials of the Mondale Campaign Establish That the So-Called "Independent" Mondale Delegate Committees Are Not in Fact "Independent".

Recent reports in the press of statements by Mondale campaign officials establish that the delegate committees are not "independent" of the Mondale campaign. On the contrary, these statements leave no doubt that the delegate committees are being established by the Mondale campaign for the very purpose of circumventing the contribution and expenditure limitations of the statute and regulations. For example, The Washington Post on March 26, 1984 [p. A1] carried an article stating:

> "Mondale's campaign effort here [in New York], while officially being outspent, nevertheless has been enriched by the formation of Mondale delegate committees in each of New York's 34 congressional districts.
>
> "Technically independent of the Mondale campaign itself, the committees are intended to work for the election of delegates pledged to Mondale. Each panel is accepting money from political action committees, while Mondale makes a point of saying that his own campaign will not accept 'PAC money' from special interests.

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> "These Mondale delegate committees are expected to spend $150,000 or more on leafletting and other expenses for the election of Mondale delegates. Labor unions are also mounting formally independent efforts, including telephone banks, in Mondale's behalf." (Emphasis added.)

The article also reports certain comments by William Hennessy, Mr. Mondale's New York State campaign manager.

> "Hennessy also extolled the benefits of the Mondale delegate committees. 'Mondale says he can't take any PAC money, but these delegate committees can -- and are taking PAC money,' he said. 'They will get a lot of their money from PACs -- both union and others'". (Emphasis added.) */

A second recent article in The Washington Post on March 29, 1984 [p. A1] (Exhibit B), reports that Mondale delegate committees also functioned in the earlier Illinois primary and indicates that the Mondale campaign has encouraged such committees, consults with them and provides them with legal advice. The article reports:

> "'There is a flock of these things in New York and other places,' Tim Finchem, Mondale's finance director, said, referring to delegate committees that have not yet filed with the FEC. As of yesterday, a total of 54 such committees had filed organization papers with the commission.

---

*/ This article is Exhibit A accompanying this Complaint. Other references herein in the form "Exhibit __" also refer to the exhibits accompanying this Complaint.

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"'We are supportive of it,' Finchem said.

"Finchem and David Ifshin, the legal counsel to the Mondale campaign, said they have advised slates of Mondale delegates across the country how to form separate fund-raising committees.

"Ifshin contended that the FEC regulations permit delegate committees to raise unlimited amounts of money, and that the cash does not count against the presidential spending limits. 'We have been the pioneers in delegate expenditures,' Ifshin said.

* * *

"According to Ifshin, the Mondale campaign can consult and provide legal advice to Mondale delegate committees. Until the explosion of Mondale delegate committees, no presidential campaign had attempted to make use of them as vehicles to raise and spend large amounts of money." (Emphasis added.)

Mr. Mondale is reported in The Washington Post on March 30, 1984 [p. A14] (Exhibit C) to have said: "These are independent committees." But the ostensible "independence" of the Mondale delegate committees is at most a facade. Further statements of Mondale campaign officials, reported in the same article, show that the Mondale campaign was behind the establishment of these committees.

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Thus, the article continued:

> "Mondale's campaign manager, Bob Beckel, said the campaign would continue encouraging formation of the independent committees.
>
> * * *
>
> "Such committees have been formed in New York, Florida, Illinois and Pennsylvania. Preliminary reports from Florida and Illinois filed with the Federal Election Commission show that more than half the $70,000 that had been raised through late February by these committees came from PACs. The rest was from individual donors.
>
> * * *
>
> "In New York alone, Mondale officials have estimated that delegate committees will raise and spend $150,000 that will not count against the spending ceiling." (Emphasis added.)

B. Concerted and Parallel Actions By The Committees Further Demonstrate Their Lack of Independence.

Beyond the statements of Mondale officials, numerous facts reflect concerted and parallel actions both among these committees and with the Mondale campaign and thus underscore the integral role they play in the Mondale campaign. Specifically:

1. The sheer number of committees formed among various states and the magnitude of the amounts contributed to the committees evidence an overall plan orchestrated by the

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Mondale campaign. For example, from Illinois, 19 delegate committee reports were filed with the FEC in which contributions totalling over $54,000 were reported. */ Based on press reports, we estimate that over 30 Mondale delegate committees are operating in New York State, and contributions as noted are projected by Mondale officials to amount to at least $150,000. Similar committees are being formed in other states such as Pennsylvania where primaries are scheduled soon. Such a substantial organizational effort clearly reflects a nationally coordinated offensive.

2. A striking uniformity in reports filed with the FEC by the Illinois Mondale delegate committees further testifies to their integral role in the Mondale campaign. Of the 19 Illinois reports on file with the Commission as of April 4, 1984, 16 are stamped as having been hand-delivered to the FEC on the morning of March 7, 1984. The reports on microfilm at the Commission are accompanied by 16 identical envelopes -- in the same handwriting, and with the identical return address ("Illinois For Mondale, 30 W. Wash-

*/ These reports were filed approximately two weeks before the Illinois primary date and therefore undoubtedly do not reflect total contributions.

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ington, Suite 530, Chicago, Illinois 60602"). */ Twelve of the committees reported purchases of campaign material from the same printer, Progress Printing. These twelve committees paid Progress Printing a total of $16,124.20 between February 22 and February 27, 1984.

3. Campaign materials disseminated by these delegate committees advocate the election of Mr. Mondale as the Democratic candidate for President. For example, Exhibit D is a handbill distributed to voters in New York by the "At Large Delegates For Mondale" which deals exclusively with purported positions of Mr. Mondale. As was noted in an article in the New York Post of March 28, 1984 (Exhibit E), "Literature paid for by the delegate slates focuses on Mondale and lists the delegates in small print in the back."

C. The Mondale Delegate Committees Are Not Making "Independent Expenditures".

These Mondale delegate committees are "political committees" subject to the Act and the Commission's regu-

*/ The materials on file therefore indicate that the reports were received in 16 similar envelopes at the same time or that they may have arrived in the same envelope.

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lations. (11 C.F.R. § 110.14(e), 11 C.F.R. § 100.5(e)(5)) By Commission regulations, contributions to such committees are subject to the expenditure limitation of 11 C.F.R. § 110.1 and 2 U.S.C. § 441a(a). (11 C.F.R. § 110.14(e)) Moreover, contributions, including in-kind contributions, by such committees are subject to the $1,000 limitation of 11 C.F.R. § 110.1 and 2 U.S.C. § 441a(a). (Id.)

When these committees make expenditures to promote Mr. Mondale's selection as the Democratic candidate for President, they make in-kind contributions to the Mondale candidacy, 11 C.F.R. § 109.1(c), and are subject to the $1,000 contribution limitation. The only exception would be if such expenditures could meet the stringent requirements of an "independent expenditure." That phrase is defined by the Commission's regulations in the following way:

> "(a) 'Independent expenditure' means 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." 11 C.F.R. § 109.1(a) (Emphasis added.)

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Expenditures by the Mondale delegate committees are not independent under this standard. */ The Mondale delegate committees were set up at the suggestion of the Mondale campaign. The Mondale campaign encouraged them -- and still encourages them. It supports them. It advises them. And it provides them legal advice. Public statements by Mondale campaign officials concede as much. Indeed, Mr. Finchem's reported statement that "We are supportive of it" -- in the context of Mr. Mondale's well-reported problems in approaching the expenditure limitations -- may appropriately be construed as encouragement to make contributions to such committees. If the expenditures here were "independent expenditures" and hence not subject to limitation, the Commission would be powerless to control abuse of the campaign contribution and spending laws of enormous magnitude. The exception would swallow the rule, and the statutory limitations would be meaningless.

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*/ Among other things the expenditures are not "independent expenditures" by the Mondale delegate committees because the expenditures are: "(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, with a view toward having the expenditure made. . . ." 11 C.F.R. § 109.1(b)(4)(i)(A).

D. The Special Treatment of Expenditures for Campaign Materials by Individual Delegates Is Not Available To Delegate Committees.

From public statements by Mondale officials, it seems that such officials recognize that expenditures by these so-called "independent" Mondale delegate committees are not "independent expenditures." It appears instead that Mondale campaign officials take the position that the committees are eligible for special treatment of expenditures for certain campaign materials which under the regulations of the Commission is available to individual delegates. */

*/ Mr. David Ifshin, who is reportedly legal counsel to the Mondale campaign, is reported in The Washington Post article of March 29, 1984, (Exhibit B), to say:

> "The only significant restriction on the delegate committees, Ifshin said, is that they cannot spend money on radio, television and other media activities supporting the Mondale campaign. They can, he argued, spend money on phone banks, vote canvassing, bumper stickers, lawn signs and other non-media political work."

In making this statement, Mr. Ifshin seemed to concede that the media expenditures by committees could not be justified as "independent expenditures." Yet he seems to contend that expenditures by committees for campaign materials and non-media political work are not subject to the independent-expenditures test. This contention could be correct only if

[Footnote continued on following page]

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This is a flagrant misconstruction of the pertinent regulations, which the Commission should promptly remedy.

The regulations of the Commission dealing with delegate spending (11 C.F.R. § 110.14) carefully distinguish between individual delegates and delegate committees. */ "'Delegate' means an individual. . . ." 11 C.F.R. § 110.14(b)(1) And "a delegate committee is a political committee. . . ." 11 C.F.R. § 110.14(b)(2)

The regulations of the Federal Election Commission dealing with contributions to and expenditures by individual delegates provide special treatment for expenditures for certain campaign materials "such as pins, bumper stickers, handbills, brochures, posters and yard signs" which advocate the selection of a delegate and which also include information

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[Footnote continued from previous page]
committees were eligible for the special treatment of campaign materials which the Commission's regulations provide for individual delegates. As noted in the text following this footnote, committees are not eligible for such special treatment.

*/ The full text of 11 C.F.R. § 110.14 is set out as Exhibit F accompanying this Complaint with handwritten indications reflecting how clearly the regulations distinguish between individual delegates and delegate committees. The Commission's notice, similarly marked, accompanying the promulgation of the final rule is Exhibit G.

on a candidate for President. Such expenditures by individual delegates are not chargeable against the presidential candidate's expenditure limitations and do not constitute contributions to the presidential candidate, provided that such materials are used in connection with volunteer activities. 11 C.F.R. § 110.14(d)(i) Other expenditures by individual delegates advocating the election of Mr. Mondale are in-kind contributions to the Mondale candidacy unless they satisfy the normal "independent expenditures" test. */

That the applicable regulation giving special treatment to expenditures for campaign materials applies only to individuals who are delegates is manifest from the terms of 11 C.F.R. § 110.14(d):

*/ Expenditures by individual delegates for "costs incurred in the use of broadcasting, newspapers, magazines, billboards, direct mail or similar types of general public communication or political advertising" which advocate the selection of a delegate and which include information on a presidential candidate are subject to rules which in essence adopt the "independent expenditures" test. If such expenditures by individual delegates are made "in cooperation, consultation or concert with, or at the request or suggestion of, the presidential candidate, his or her authorized political committee(s), or their agents," then they are "in-kind contributions to the presidential candidate" and are charged against the candidate's expenditure limitation. 11 C.F.R. § 111.14(d)(ii)

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"(d) Expenditures by Delegates -- (1) Expenditures by a delegate from contributions to him or her, or from personal funds, to defray costs incurred to advocate only his or her own selection are neither subject to limitations under 11 C.F.R. Part 110 and 2 U.S.C. 441a nor reportable under 11 C.F.R. Part 104 and 2 U.S.C. 434. (See 11 C.F.R. 110.14(e) for reporting requirements relating to delegate committees.) Such costs may include but are not limited to: costs of travel and subsistence during the delegate selection process, including the national nominating convention, and the cost of any communications advocating only a delegate's selection. Such expenditures are also not chargeable against the expenditure limits of any presidential candidate under 11 C.F.R. 110.8(a) or 2 U.S.C. 441a(b).

"(2)(i) Expenditures by a delegate from contributions to him or her or from personal funds for costs of certain campaign materials (such as pins, bumper stickers, handbills, brochures, posters and yard signs) which advocate the selection of a delegate and which also include information on or reference to any candidate for the office of President are not reportable by the delegate under 11 C.F.R. Part 104 and 2 U.S.C. 434. (See 11 C.F.R. 110.14(e) for reporting requirements relating to delegate committees.) Such expenditures are neither contributions to the presidential candidate subject to limitations under 11 C.F.R. § 110.1(a) and 2 U.S.C. 441a(a)(1) nor expenditures which count against the expenditure limitation of the presidential candidate under 11 C.F.R. 110.8(a) and 2 U.S.C. 441a(b), provided that:

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"(A) Such materials are used in connection with volunteer activities; . . . ." (Emphasis added.)

The provisions applicable to delegate committees are expressly governed by subsection (e) of 11 C.F.R. § 110.14, which states:

> "(e) Delegate Committees. Delegate committees as defined at 11 C.F.R. 100.5(e)(5) which qualify as political committees under 11 C.F.R. 100.5 and 2 U.S.C. 431(4) must register with the Commission pursuant to 11 C.F.R. Part 102 and 2 U.S.C. 433, and must file reports of contributions received and expenditures made pursuant to 11 C.F.R. Part 104 and 2 U.S.C. 434. Contributions to delegate committees are subject to limitation under 11 C.F.R. 110.1 and 2 U.S.C. 441a(a). Contributions made by delegate committees are subject to limitations under 11 C.F.R. 110.1 and 2 U.S.C. 441a(a)." 11 C.F.R. 110.14(e) (Emphasis added.) */

This distinction makes eminent sense. The Commission fashioned a limited exception to expenditure and contribution limitations for individuals to further their own candidacies for delegates on behalf of a presi-

*/ "Delegate committees" are defined both in subpart 110.14 relating to delegates (11 C.F.R. § 110.14(b)(2) and also in the general definitions of the regulations (11 C.F.R. § 100.5(e)(5)). As noted, a number of the Mondale delegate committees have registered already.

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dential candidate. */ To allow delegates to band together in the type of nationally coordinated offensive the Mondale campaign is conducting here inflates that exception so much as to rob the limitations on expenditures and contributions of any force.

In short, a delegate committee is like any other political committee which makes expenditures advocating the election of a particular candidate for federal office. Unless the expenditures for that purpose qualify as "independent expenditures" -- and, as we have noted, expenditures by the Mondale delegate committees would not qualify under

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*/ Indeed, the Commission issued an Advisory Opinion (AO-1980-5) on March 20, 1984, further recognizing this distinction in response to a specific request for advice. After discussing the rules applicable to individual delegates, the Commission noted that a delegate slate could become a political committee if expenditures exceed $1,000 in amount and that, when that occurs: "As a political committee the delegate slate would be subject to all of the requirements of the Act relating to political committees." 1 CCH Fed. Elec. Campaign Guide ¶5466 at page 10,523 (Emphasis added.) As the advisory opinion indicates, the expenditures of such a committee advocating the election of a particular presidential candidate either would be reportable independent expenditures if they satisfied the "independent expenditures" test or would be in-kind contributions to the candidate if they did not satisfy that test. (Id.)

this standard -- such expenditures are in-kind contributions to the candidate and are limited to an aggregate of $1,000 in amount. 11 C.F.R. § 110.1 and 2 U.S.C. § 441a(a). */ There is no exception for any expenditures by committees for campaign materials such as "pins, bumper stickers, handbills, brochures, posters and yard signs" or any other category of expenditure used to promote the election of a particular presidential candidate. The special treatment of expenditures for such campaign material available to individual delegates is not available to committees.

II. THE COMMISSION SHOULD ACT PROMPTLY TO PREVENT ON-GOING ABUSES WHICH THREATEN PUBLIC CONFIDENCE IN THE CAMPAIGN FINANCIAL LAWS.

There is substantial evidence that significant violations have occurred and will continue in the plan to establish Mondale delegate committees in the primary states.

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*/ Section 109.1 of the Commission's regulations, which governs "independent expenditures", provides:

> "(c) An expenditure not qualifying under this section as an independent expenditure shall be a contribution in-kind to the candidate and an expenditure by the candidate, unless otherwise exempted." 11 C.F.R. § 109.1(c)

[Footnote continued on following page]

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Unless the Commission quickly halts this plan, it will be difficult later to impose a remedy that will restore the integrity of the political process and effectuate the purposes of the Federal Election Campaign Act.

The violations arising out of the Mondale campaign's "delegate committee" scheme are several. Wholly aside from the fact that the delegate committees are designed to circumvent the expenditure limitations to which the Mondale campaign is subject, the "delegate committee" scheme promotes violations of spending limitations to which the affiliated delegate committees are themselves subject. It also enhances the likelihood that individuals and PACs will exceed the $1,000 and $5,000 contribution limitations imposed by law on them.

A. In-Kind Contributions by Delegate Committees To The Mondale Candidacy Appear to Exceed Limitations.

The Mondale delegate committees should be regarded as affiliated with one another, so that the expenditures

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[Footnote continued from previous page]
As we have noted, expenditures by delegate committees promoting the Mondale candidacy are not "independent expenditures." Nor are they exempted by the terms of 11 C.F.R. § 110.14(d) which provide special treatment of expenditures for certain campaign materials by individual delegates.

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(in-kind contributions) by all of them must be aggregated to determine whether the committees are in compliance with the $1,000 limitation of 11 C.F.R. § 110.1. (11 C.F.R. § 110.3(a)(1)) Committees are "affiliated" -- and are thus treated for limitation purposes as a single committee -- when they are established, financed, maintained or controlled by the same group of persons. (Id.; 11 C.F.R. § 100.5(g)) "All of the political committees set up by the same group of persons are treated as a single political committee." (11 C.F.R. § 110.3(a)(1)(ii)(E))

By this standard, all of the Illinois, New York and Pennsylvania Mondale delegate committees, and all other such committees which may be set up in the future by the encouragement and advice of Mondale campaign officials are -- in the aggregate -- limited to $1,000 in in-kind contributions to the Mondale candidacy. With at least 34 committees in New York alone, spending, according to press reports, $150,000, the potential for abuse of the expenditure limitations is manifest. It would be fanciful to assume that the New York committees -- much less the New York committees

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aggregated with all other similar committees in other states -- will stay, or have stayed, within an aggregate limitation of $1,000 to promote the Mondale candidacy.

There is little doubt that the Mondale delegate committees are set up to make expenditures on behalf of the Mondale candidacy. As we have noted, the New York Post on March 28, 1984 (Exhibit E) reported, for example, that "Literature paid for by the delegate slates focuses on Mondale and lists the delegates in small print on the back." As we have also noted as a further illustration, a handbill distributed in New York by an organization calling itself "At-Large Delegates for Mondale" is entirely devoted to advocacy of Mr. Mondale as a presidential candidate. (Exhibit D)

The Mondale campaign cannot escape responsibility for the actions of these committees. The Commission's rules specify that "no candidate or political committee shall accept any contribution" in violation of contribution limitations. 11 C.F.R. § 110.9(a)

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B. Contributions to the Mondale Delegate Committees May in Some Instances Exceed Limitations.

The scheme of the Mondale campaign for delegate committee spending also encourages violations by individuals and by committees other than the delegate committees themselves of the spending limitations applicable to them. By promoting the idea that the delegate committees are "independent" of the Mondale campaign, the Mondale campaign appears to be suggesting that individuals may contribute to the Mondale campaign and to the so-called "independent" Mondale delegate committee even if the contributions in the aggregate exceed the limits for a person's contribution to a single candidate. This has in fact occurred. */ However, under the statute and applicable regulations, the limits

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*/ For example, a review of the reports filed by the Illinois Mondale Committees indicates that one PAC contributed a total of $6,000 and another PAC contributed a total of $8,000 to the Mondale delegate committees in Illinois. The reports further reflect that one individual, a Chicago businessman, contributed $4,250 in the aggregate to these committees.

It is also noteworthy that of approximately $54,000 in contributions listed in these Illinois reports, fully $26,000 came from out-of-state PACs with addresses in the Washington, D.C. metropolitan area, Pittsburgh, Pennsylvania and Detroit, Michigan. Such contributions cannot plausibly be construed as local support for local delegates.

cannot be evaded in this way, because a contributor may not exceed his or her limit by giving to multiple committees acting on behalf of the election of one candidate when the contributor has "knowledge that a substantial portion [of the contribution] will be contributed to, or expended on behalf of, that candidate for the same election. . . ." 11 C.F.R. § 110.1(h)(2) To assert that the Mondale delegate committees are "independent" -- when a substantial part of their expenditures are for the purpose of promoting the Mondale candidacy -- is to promote violations of this provision.

* * *

The Commission has a special responsibility to act decisively to stop the proliferation of these delegate committees. Persons other than the Commission aggrieved by these practices are barred under the statute from taking effective legal action to secure an injunction, since the power of the Commission to initiate actions for injunctions and declaratory relief is "the exclusive civil remedy for the enforcement of the provisions of this Act." 2 U.S.C. § 437d(e)

In the end, the proliferation of such committees probably turns in substantial degree on a simple issue

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whether the provisions for "Expenditures by Delegates" set forth in 11 C.F.R. § 110.14(d) are applicable to individual delegates alone -- as the regulation makes plain -- or whether it should be deemed to include both individual delegates and delegate committees. A simple reaffirmation by the Commission of the plain meaning of its regulations might effectively halt many of the abuses noted in this Complaint.

If after such a reaffirmation the Mondale campaign persists in pursuing its "delegate committee" plan to establish Mondale delegate committees which make expenditures on behalf of the Mondale candidacy, the Commission is not powerless to stop such activities. While the procedural requirements of the statute and the Commission's regulations necessarily involve certain delays before action is taken on past violations, the Commission's invocation of its own powers to seek an injunction against future violations need not await completion of those procedures. On the contrary, when a violation in the future is threatened, as we believe it clearly is in the present instance unless the

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Mondale campaign abandons its "delegate committee" plan, the Commission may act forthwith to determine that there are reasons to believe that the provisions of the statute, 2 U.S.C. § 441a(a), are about to be violated and to authorize the Commission's general counsel to seek immediate injunctive relief in court to prevent such violation. */ As to past violations, the Mondale campaign is entitled to certain

*/ A precedent for this action is outlined in the documents accompanying this Complaint as Exhibit H. On February 19, 1980, complaints were presented that a debate was scheduled for February 23, 1980, that was to be limited to two of the then five Republican candidates in the New Hampshire primary. Such a limitation would, according to the complaints, have constituted an in-kind contribution by the sponsor of the debates to the Reagan and Bush campaigns, since the debate was not non-partisan as required by the Commission's rules. On February 20, 1980, the Commission's general counsel advised the Commission that the Commission could seek injunctive action without awaiting the expiration of the normal periods provided in the Commission's procedural regulations for responding to complaints. (See general counsel's report dated February 20, 1980, pp. 13-14, included in Exhibit H accompanying this Complaint.) As shown in Exhibit H, the commission agreed and forthwith found reason to believe that the sponsor of the debate was about to violate the non-partisan requirement and authorized the general counsel to seek immediate injunctive relief in court to prevent the violation. (As also indicated in Exhibit H, when this action was communicated to the sponsor of the debate on February 20, 1980, the sponsor indicated that the expenses of the debate would be reimbursed by one of the candidates. Based on this representation, the injunction was not pursued.)

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procedural rights before the Commission determines that violations have taken place and specifies the remedies that should be undertaken and the penalties to be imposed. */ The appropriate procedural steps should be initiated immediately, but a simple statement by the Commission as to the plain meaning of its own regulations need not await the completion of those procedural steps with respect to past violations.

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*/ Normally a respondent is entitled to submit "within fifteen (15) days" a response to a complaint. 11 C.F.R. § 111.6. We ask that in view of the extraordinary circumstances of the present matter, and the great public importance which should be attached to the disposition of the issues raised in this Complaint, that respondent Mondale For President Committee, Inc., be required to respond to this Complaint within five days. The Commission's general counsel has stated that such action is appropriate when (1) there is a substantial likelihood that the complaint sets forth a violation of the Act, (2) failure of the Commission to act expeditiously will result in irreparable harm to the complainant or some other party, (3) expeditious action will not result in undue harm or prejudice to the interests of other persons and (4) the public interest would be served by expeditious handling of the matter. (General counsel's report dated February 20, 1980 included in Exhibit H hereto, pp. 11-12.) We submit that these conditions are satisfied in this instance.

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CONCLUSION

For the reasons stated herein, Complainant Americans With Hart, Inc. respectfully requests that the Commission immediately issue a statement that its regulations relating to "Expenditures By Delegates" in 11 C.F.R. § 110.14(d) apply only to individual delegates and not to delegate committees. If such statement fails to halt the practices identified in this Complaint, the Commission should authorize the Commission's general counsel to seek an injunction against such practices. Meanwhile, the Commission should immediately take the steps outlined at pages 4-6 of this Complaint to initiate proceedings to secure a prompt determination of, and a decision on the appropriate remedies with respect to, the violations of law which may have taken place in the past.

Respectfully submitted,

Americans With Hart, Inc.

by John M. Quinn

John M. Quinn
General Counsel
507 8th St., S.E.
Washington, D.C. 20003
(202) 675-9000

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VERIFICATION

Washington)
) ss:
District of Columbia)

In accordance with 11 C.F.R. § 111.4(b), I hereby verify that I am general counsel of Americans With Hart, Inc., and am authorized to file this Complaint on its behalf, that the factual statements in the Complaint are based on the information set forth in the exhibits accompanying this Complaint and in reports on file with the Federal Election Commission, as identified in the Complaint, that the exhibits are true and correct copies of the documents described in the Complaint and that I believe that the factual statements in the Complaint are correct, subject to the accuracy of such exhibits and reports.

John M. Quinn

Subscribed and sworn to
before me this 5th day of
April, 1984

Marshall Vallancourt
Notary Public

My Commission Expires October 31, 1988

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of the Complaint of	
Americans With Hart, Inc.	
Complainant,	
- against -	
Mondale For President Committee, Inc.	
Respondent.	

EXHIBITS TO
COMPLAINT PURSUANT TO PART 111 OF
THE COMMISSION'S REGULATIONS

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Gov. Cuomo Firmly Guides Mondale's N.Y. Effort

By Martin Schram
Washington Post Staff Writer

NEW YORK, March 25—New York Gov. Mario M. Cuomo has taken total control of Walter F. Mondale's New York primary operation, installing his lieutenants to run every facet of the drive to defeat Sen. Gary Hart (D-Colo.) in the largest contest yet in the Democratic presidential campaign.

Hart comes into the state lacking the power and prestige of the party elite, but fortified by ample money and the prospect of new momentum. Hart is expected to win Tuesday's primary in Connecticut, a prelude to the contest here a week later that will select 285 delegates to the party's national convention.

Mondale's campaign effort here, while officially being outspent, nevertheless has been enriched by the formation of Mondale delegate committees in each of New York's 34 congressional districts.

Technically independent of the Mondale campaign itself, the committees are intended to work for the election of delegates pledged to Mondale. Each panel is accepting money from political action committees, while Mondale makes a point of saying that his own campaign will not accept "PAC money" from special interests.

These Mondale delegate committees are expected to spend $150,000 or more on leafletting and other expenses for the election of Mondale delegates. Labor unions are also mounting formally independent efforts, including telephone banks, in Mondale's behalf.

All of that is important for Mondale because none of that spending will be charged to the Mondale campaign, which already is too close for comfort to the federally mandated 1984 primary and caucus spending ceiling of $24.6 million.

Mondale's New York State headquarters is virtually devoid of Mondale people, as Cuomo deputies have moved into every key command post.

See NEW YORK, A4, Col. 3

■ *Mondale defends his record on support for Israel.* *Page A6*

NEW YORK, From A1

Putting his prestige on the line to a degree rarely seen in presidential politics, Cuomo, who ran and won the governorship as the outsider fighting the party establishment in 1982, has gone all out to deliver the entire party—regulars and reformers, his longtime friends and perennial foes—for Mondale.

Cuomo is Mondale's state campaign chairman. Cuomo's handpicked state Democratic Party chairman, William Hennessy, is Mondale's state campaign manager. Cuomo's son, Andrew, who is his executive assistant as governor and was his top campaign strategist in 1982, is coordinating strategy here for Mondale.

Cuomo's counselor, Timothy Russert, is serving as a Mondale adviser on issues and tactics. Cuomo's top fund-raiser is now Mondale's fund-raiser, and all down the line, the Cuomo Cabinet seems to have established temporary residency in the Mondale campaign headquarters.

Hennessy made it clear just how much the Mondale campaign is a Cuomo operation. "The governor's whole team is here," he said. "Andrew and I have total control of this package."

Mondale's national campaign officials said they considered this a worthwhile arrangement in exchange for the kind of statewide support Cuomo has brought Mondale.

Hennessy also extolled the benefits of the Mondale delegate committees. "Mondale says he can't take any PAC money, but these delegate committees can—and they are taking PAC money," he said. "They will get a lot of their money from PACs—both unions and others."

Mondale's advisers say they believe that Hart will spend about $700,000 and that they will spend officially perhaps $300,000. Hart ads have been on television for the last week. Mondale's ads are still being planned.

In a statewide show of force, Cuomo brought Mondale the endorsements of 60 of New York's 62 county Democratic chairmen—past campaign friends and enemies alike. Cuomo also brought in political consultant David Garth, who ran New York City Mayor Edward I. Koch's gubernatorial campaign against Cuomo in 1982, to design Mondale's New York television ads.

Decisions for Mondale's campaign here are being made by Cuomo's people, notably Andrew Cuomo, in consultation with Mondale's national campaign chairman, James Johnson. For example, advertising decisions were being made this weekend in meetings involving the governor, his son, Garth and Johnson, Mondale officials said.

Hart and Mondale officials say they believe that Mondale probably has a small lead in New York, even though there have been no recent polls in the state.

Cuomo's decision to place his prestige on the line for Mondale, while surprising to some outside politicians, came as no shock to those who know him best. "Mario Cuomo does not play it coy and he does not play it cute," Andrew Cuomo said.

There is another factor underlying Cuomo's decision. In 1980, Cuomo was furious at the way President Carter's team of southerners ran the New York primary contest. Cuomo, then lieutenant governor, was out front for Carter but had no say over campaign decisions. Carter was soundly thrashed by Sen. Edward M. Kennedy (D-Mass.) just when the president had seemed to have Kennedy knocked out of the race.

This time, Cuomo vowed, he would participate fully or not at all.

"There are two factors that I do not know about," Cuomo said in an interview. "One is Connecticut, where we are going to lose; the second is money, where we are going to lose. If it was not for Connecticut and the money, I'd say we'd win by 6 to 8 points for sure. But now I have to say it's a dogfight."

THE WASHINGTON POST
MARCH 26, 1984

EXHIBIT A

THE WASHINGTON POST

MARCH 29, 1984

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Delegate Units Help Mondale Raise Spending

By Thomas B. Edsall
Washington Post Staff Writer

Backers of Walter F. Mondale have found a way around federal spending restrictions that threatened to curtail his campaigning in the crucial big-state showdowns against Sen. Gary Hart (D-Colo.) in the next two months.

The new technique uses special "delegate committees" to channel hundreds of thousands of dollars, including large union contributions, in support of the former vice president's campaign.

The delegate committees collect much of their money from political action committees (PACs). The Mondale campaign has refused to accept PAC money.

The major donors in initial reports to the Federal Election Commission have been the United Automobile Workers, which gave $12,000 in six separate contributions of $2,000 each; the American Federation of Teachers, which gave $6,000; the American Federation of State, County and Municipal Employes, which gave $6,000, and the Carpenters Legislative Improvement Committee.

In addition, Richard Dennis, whom Mondale officials described as a "wealthy commodities dealer" in Chicago, gave $4,000 in amounts of $250 to $900 to 10 different delegate committees in Illinois.

Mondale, who spent large amounts of money early in the campaign against a $24.4 million federal spending ceiling, can spend only $5.5 million to $6 million for all the primaries and caucuses after Tuesday's New York primary, according to aides. Hart will be able to spend an estimated $15 million after New York.

The use of delegate committees provides a new mechanism to add cash to the Mondale drive, and none of it will apply against the federal spending limit, according to aides.

In New York alone, Mondale officials say they expect delegate committees to raise $150,000 in addition to about $500,000 that will be spent by the official Mondale campaign.

In Florida and Illinois, at least $70,000 was raised by

See MONEY, A12, Col. 1

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MONEY, From A1

late February, according to reports filed at the FEC. Over half of it, $36,000, is from PACs. The figure far understates the total, however, because it does not include money raised and spent in the final two weeks of the campaign in those two states.

"There is a flock of these things in New York and other places," Tim Finchem, Mondale's finance director, said, referring to delegate committees that have not yet filed with the FEC. As of yesterday, a total of 54 such committees had filed organization papers with the commission.

"We are supportive of it," Finchem said.

Finchem and David Ifshin, the legal counsel to the Mondale campaign, said they have advised states of Mondale delegates across the country how to form separate fund-raising committees.

Ifshin contended that the FEC regulations permit delegate committees to raise unlimited amounts of money, and that the cash does not count against the presidential spending limits. "We have been the pioneers in delegate expenditures," Ifshin said.

The only significant restriction on the delegate committees, Ifshin said, is that they cannot spend money on radio, television or other media activities supporting the Mondale campaign. They can, he argued, spend money on phone banks, vote canvassing, bumper stickers, lawn signs, and other non-media political work.

Ifshin said Mondale has told aides to discourage delegate committees from accepting PAC money. The committees are legally autonomous, however, and can accept any money as long as they comply with FEC regulations.

In New York, Mondale's state campaign manager, William Hennessy, noted: "Mondale says he can't take any PAC money, but these delegate committees can—and they are taking PAC money."

Finchem contended that the delegate committees are not a hidden way around federal spending limitations. He said the campaign has budgeted specific amounts for each state and, since it does not directly control the way delegate committees spend their money, the budgets are not based on assumptions of support from the delegate committees.

As of Feb. 29, the Mondale delegate committee reporting the largest amount of money raised was the 20th District Delegates for Mondale in Illinois. It had raised $10,337, including $5,000 from the Carpenters and $2,000 from the UAW.

In Illinois, the largest expenditure was the payment of over $20,000 by 12 separate delegate committees to Progress Printing in Chicago for brochures and other campaign literature.

The regulation of candidates seeking to become delegates to the presidential conventions always has been one of the most complex terrains for the FEC. Under the law, they are participating in federal elections, but as individuals they are not "federal candidates" since they are not seeking federal position.

The FEC has ruled that when delegates form a committee, they must report what they raise and spend, although individuals running for delegate without joining committees do not face the requirement.

Delegate committees are not the same as "independent" committees, such as the National Conservative Political Action Committee, which plans to spend as much as $5 million in support of President Reagan.

Independent committees can spend unlimited amounts, but must remain completely separate from the campaign they are supporting, and no consultation between the two is allowed.

According to Ifshin, the Mondale campaign can consult and provide legal advice to Mondale delegate committees. Until the explosion of Mondale delegate committees, no presidential campaign had attempted to make use of them as vehicles to raise and spend large amounts of money.

EXHIBIT C

THE WASHINGTON POST
March 30, 1984

Mondale Says He Prefers No Separate Fund Units

By Thomas B. Edsall
Washington Post Staff Writer

Walter F. Mondale, reacting to disclosures that special "delegate committees" supporting his candidacy are accepting political action committee money, first denounced the practice and then appeared to soften his stance yesterday, and his top aides said nothing can be done to stop it.

"I don't want those delegates taking any PAC money," Mondale said in a New York Post interview published yesterday. "I want it known I don't want any PAC money because I am dead serious about that issue."

Later in the day, the Associated Press quoted Mondale as saying, "I want it done the way I suggest," but added, "Those are independent committees. [Accepting PAC money] can be done legally, but as a matter of policy, I prefer that it not be done and I've said so."

But Bill Hennessy, who is running Mondale's New York campaign, said, "I'm sure it's true in his mind and that's the way he would like to have it, but the fact of the matter is that they [the delegate committees] are legally autonomous."

Mondale's campaign manager, Bob Beckel, said the campaign would continue encouraging formation of the independent committees. As for taking money from PACs, Beckel said, "There's not a lot we can do about it. Mondale doesn't like it and I don't like it . . . . We have no right to go to the labor unions and tell them not to spend their money."

PACs have become an important fund-raising mechanism in recent years. Often organized by corporations, trade associations and unions, they have been sharply attacked as special interests that use money to gain favor with the government.

Mondale and his principal rival, Sen. Gary Hart (D-Colo.), have said their campaigns will not accept PAC contributions. Mondale, however, has encouraged aides of his delegates to form committees that can raise and spend money separately from the Mondale campaign.

Such committees have been formed in New York, Florida, Illinois and Pennsylvania. Preliminary reports from Florida and Illinois filed with the Federal Election Commission show that more than half the $70,000 that had been raised through late February by these committees came from PACs. The rest was from individual donors.

These committees may become critically important to Mondale if the contest for the Democratic presidential nomination extends to the June 5 California primary because his campaign is in danger of bumping into the overall $24.24 million spending ceiling. From April 3, the day of the New York primary, through the California contest, Mondale aides say they can spend $5.5 million to $6 million. Hart, if he can raise the money, will be able to spend about $15 million.

In New York alone, Mondale officials have estimated that delegate committees will raise and spend $150,000 that will not count against the spending ceiling. There is no limit on the money the delegate committees can raise and spend.

Hart yesterday sharply attacked the use of PAC money by the Mondale delegate committees. "For all practical purposes, it's a backdoor use of PAC funds," he said. "I hope Vice President Mondale could get the signal across to his campaign that his pledge is not to use that money, and that they should not do it in the future."

Hart, who accepted PAC money in his 1980 Senate race, said whatever PAC money the Mondale delegate committees have expended, should be returned." He argued that a "president cannot reform campaign spending laws if he comes to office obligated to PACs."

Staff writers David S. Broder and Dan Balz contributed to this report.

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Just About Ever, Candidate Running For President Says
He's A Good Friend Of Israel. But Whom Can You Believe?

Walter Mondale

A History of Strong Support For Israel



Mondale with Prime Minister Begin

Since 1964, as U.S. Senator and as Vice-President of the United States, Walter Mondale has been a vigorous champion of close U.S.-Israel ties. Mondale's support for Israel is premised on his deeply held belief that Israel, as the only true democracy in the Middle East, is a critically important *strategic ally* of the U.S. in our joint struggle to promote peace and deter Soviet influence.

Walter Mondale Speaks:

• **On Israel's Security:** "The United States must continue to provide Israel's armed forces with the most modern weapons and technology – and we must *not* furnish sophisticated weaponry to Israel's sworn enemies, like Syria and Saudi Arabia."

• **On Jerusalem:** "The U.S. should move our embassy to the capital of Israel, Jerusalem, as a clear demonstration that we recognize Jerusalem as Israel's eternal capital."

• **On Strategic Cooperation:** "The Reagan Administration has acted as if closer American military ties with Israel would be nothing but a 'favor' to Israel. I completely reject that point of view. Strategic cooperation is not a gift to Israel – it is an important contribution to the *national interest of the United States* in meeting the Soviet challenge. Reagan's policy of holding Israel at arm's length, while virtually ignoring the Syrian threat, went so far as to endanger the lives of wounded American marines by rejecting Israel's offer of medical care. This policy must be reversed."



Mondale with Yehuda Hellman and Julius Berman at the Conference of Presidents of Major American Jewish Organizations

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The following handbill was distributed as a single sheet of paper. Page 2 of Exhibit D was the front of the sheet. Page 3 of Exhibit D was the back of the sheet.

[The original single-sheet handbill is included with the signed original of the Complaint filed with the Federal Election Commission.]

Just About Every Candidate Running for President Says He's A Good Friend Of Israel. But Whom Can You Believe?

EXHIBIT D
Page 2 of 3

Walter Mondale

A History of Strong Support For Israel



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Mondale with Yehuda Hellman and Julius Berman at the Conference of Presidents of Major American Jewish Organizations

Walter Mondale Speaks:

• **On Soviet Jewry:** "The U.S. must do everything within its power to win freedom for Soviet Jews so that they may emigrate freely to Israel and the West. In 1974, as a U.S. Senator, I visited Refuseniks in Moscow and saw firsthand how Soviet policy is aimed at the obliteration of the Jewish community and Jewish culture. A high priority in any future agreements to reduce tensions between the US and the USSR must include freeing Soviet Jews from their confinement in the Soviet Union."

• **On Anti-Semitism:** "Tragically, there are still people who harbor hatred for Jews. Sometimes these people commit acts of violence and terrorism, whether here in our own country, in France or in other nations. We must teach our children never to forget the terrible lessons of the Holocaust, and to appreciate the tremendous contribution that the Jewish people have made to America and to the world. As President, I would use the full weight of my office to root out anti-Semitism, and to vigorously prosecute the remaining Nazi war criminals who have shockingly found a haven in our country."

• **On The Arab Boycott:** "From my earliest days in the Senate I worked to deter American firms from cooperating with the Arab boycott of Israel. American business must never be permitted to knuckle under to the blackmail of Arab oil or oil money in any scheme designed to cut Israel off from free trade or access to vital resources."



Joan and Walter Mondale with their children Ted, William and Eleanor

Walter Mondale is endorsed by: Governor Mario Cuomo, U.S. Senator Daniel "Pat" Moynihan, State Attorney General Bob Abrams, Mayor Ed Koch, and the "At-Large Delegates for Mondale": Lt. Gov. Al Del Bello, Assembly Speaker Stanley Fink and Council President Carol Bellamy.

Vote for Walter Mondale to Elect Mondale At-Large Delegates

Walter Mondale's Program To Strengthen America:

THE ECONOMY:

- *Reduce* federal deficits to bring down interest rates.
- *Create* a strong new trade policy.
- *Revitalize* ailing basic industries.

DEFENSE:

- *Improve* conventional forces to reduce risk of nuclear war.
- *Support* Stealth bomber and strong navy.
- *Oppose* B-1 bomber and MX missile, both costly and ineffective.

OLDER AMERICANS:

- *Protect* Social Security benefits.
- *Maintain* Medicare.
- *Increase* Home Health Care Benefits.

Paid For By At-Large Delegates For Mondale

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EXHIBIT E

NEW YORK POST, WEDNESDAY, MARCH 28, 1984 page 16

'FRITZ' DELEGATES HIT ON 'TRADEOFF$'

By FREDRIC DICKER and DEBORAH ORIN

CAMPAIGN '84

ALBANY. Gary Hart's New York campaign team blasted Walter Mondale's would-be local delegates yesterday for taking money from powerful political action committees.

"It's like trading dollars for votes," charged Larry Mandelker, a senior Hart campaign adviser in the state.

"To take money from PACs means you want to deal very nakedly with special interests."

Mondale announced last year his campaign would refuse all PAC money. Hart, also said he'd refuse PAC money.

But PAC money is being accepted by New Yorkers who have special committees helping to finance their campaigns to win slots as Mondale delegates to the Democratic nominating convention this summer.

The delegates will be chosen in next Tuesday's New York primary.

State Democratic Party chairman William Hennessy, heading Mondale's local campaign, insisted yesterday there is no conflict in Mondale delegates taking PAC money while the candidate himself refuses it.

"The Mondale campaign is a separate campaign from the delegate campaigns," he said.

"While the Mondale campaign is not accepting PAC money, we can't impose their conditions on the delegates."

Asked about his personal feelings on PACs, Hennessy sidestepped the issue.

"I don't have any personal feeling any more," he said.

"I'm doing the best I can to help 34 delegate slates and 300 or so slates and many coordinators, all in the same ballgame."

Literature paid for by the delegate slates focuses on Mondale and lists the delegates in small print on the back.

Hart's national campaign is also considering a challenge to the legality of the delegate committees as a financial mechanism, aides told The Post.

Hart campaign lawyer Ken Guido said he's been "asked to look at it and I'm looking at it. I will give advice to my client shortly."

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EXHIBIT F
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§ 116.14 Contributions to and expenditures by delegates.

(a) 11 CFR 116.14 applies to all levels of a delegate selection process and sets forth the prohibitions, limitations and requirements applicable under the Act to delegates.

(b) *Definitions*—(1) *Delegate.* "Delegate" means an individual who becomes or seeks to become a delegate, as defined by State law or party rule, to a national nominating convention or to a State, district, or local convention, caucus or primary which is held to select delegates to a national nominating convention.

(2) *Delegate Committee.* A delegate committee is a political committee which receives contributions or makes expenditures for the purpose of influencing the selection of delegates to a national nominating convention. The term "delegate committee" includes a group of delegates, a group of individuals seeking selection as delegates and a group of individuals supporting delegates.

(c) *Contributions to Delegates.* Contributions to a delegate for the purpose of furthering that delegate's selection are not subject to the limitations of 11 CFR 110.1 and 110.2 and 2 U.S.C. 441a(a)(1) and (2); nor are such contributions reportable under 11 CFR Part 104 or 2 U.S.C. 434. (See 11 CFR 116.14(d) for limitations and reporting requirements relating to contributions to delegate committees.) However, if an individual makes such a contribution, it counts against that individual's aggregate contribution limit of $25,000 in a calendar year under 11 CFR 110.5 and 2 U.S.C. 441a(a)(3). Contributions made to a delegate by the campaign committee of a presidential candidate count against that presidential candidate's expenditure limitation under 11 CFR 110.8(a) and 2 U.S.C. 441a(b).

(d) *Expenditures by Delegates.*—(1) Expenditures by a delegate from contributions to him or her, or from personal funds, to defray costs incurred to advocate only his or her own selection are neither subject to limitations under 11 CFR Part 110 and 2 U.S.C. 441a nor reportable under 11 CFR Part 104 and 2 U.S.C. 434. (See 11 CFR

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EXHIBIT F
Page 2 of 3

110.14(e) for reporting requirements relating to delegate committees.) Such costs may include but are not limited to: costs of travel and subsistence during the delegate selection process, including the national nominating convention, and the cost of any communications advocating only a delegate's selection. Such expenditures are also not chargeable against the expenditure limits of any presidential candidate under 11 CFR 110.8(a) or 2 U.S.C. 441a(b).

(2)(i) Expenditures by a delegate from contributions to him or her or from personal funds for costs of certain campaign materials (such as pins, bumper stickers, handbills, brochures, posters and yard signs) which advocate the selection of a delegate and which also include information on or reference to any candidate for the office of President are not reportable by the delegate under 11 CFR Part 104 and 2 U.S.C. 434. (See 11 CFR 110.14(e) for reporting requirements relating to delegate committees.) Such expenditures are neither contributions to the presidential candidate subject to limitations under 11 CFR 110.1(a) and 2 U.S.C. 441a(a)(1) nor expenditures which count against the expenditure limitation of the presidential candidate under 11 CFR 110.8(a) and 2 U.S.C. 441a(b), provided that:

(A) Such materials are used in connection with volunteer activities; and

(B) Such expenditures are not for costs incurred in the use of broadcasting, newspapers, magazines, billboards, direct mail or similar types of general public communication or political advertising.

(ii) Expenditures by a delegate from contributions to him or her or from personal funds for costs incurred in the use of broadcasting, newspapers, magazines, billboards, direct mail or similar types of general public communication or political advertising which advocate the selection of a delegate and which also include information on or reference to a candidate for the office of President are neither subject to limitations under 11 CFR 110.1(a) and 2 U.S.C. 441a(a)(1) and (2), nor reportable under 11 CFR Part 104 and 2 U.S.C. 434, except as provided under 11 CFR 110.14(d)(2)(ii)(A) and (B).

(See 11 CFR 110.14(e) for reporting requirements relating to delegate committees.)

(A)(1) Such expenditures are subject to limitations if they are in-kind contributions to the presidential candidate. Such expenditures are in-kind contributions to the presidential candidate under 2 U.S.C. 441a(a)(7) if the delegate makes such expenditures in cooperation, consultation or concert with, or at the request or suggestion of, the presidential candidate, his or her authorized political committee(s), or their agents. Such an in-kind contribution is subject to the contribution limitations of 11 CFR 110.1 and 2 U.S.C. 441a(a)(1) and must be reported by the presidential candidate's authorized committee(s) as a contribution under 11 CFR Part 104 and 2 U.S.C. 434. Except as provided in 11 CFR 110.14(d)(2)(ii)(A)(3). Such in-kind contributions are chargeable against the presidential candidate's expenditure limitation under 11 CFR 110.8(a) and 2 U.S.C. 441a(b).

(2) If the delegate finances the dissemination, distribution or republication, in whole or in part, of any broadcast or materials prepared by the presidential candidate, his or her authorized committee(s) or their agents, such expenditure shall not be chargeable against that candidate's expenditure limitation unless it was made with the cooperation, or with the prior consent of, or in consultation with, or at the request or suggestion of, the candidate or any authorized agent or committee thereof.

(B) Such expenditures are not subject to limitations, but are reportable if they are independent expenditures. Such expenditures are independent expenditures under 11 CFR 109.1(a) and 2 U.S.C. 431(17) if they are made to expressly advocate the election of a clearly identified presidential candidate and are not made with the cooperation or with the prior consent of, or in consultation with, or at the request or suggestion of, the presidential candidate or authorized committee of such candidate. Such independent expenditures are not limited but must be reported by the delegate in accordance with 11 CFR 109.2, and 2 U.S.C. 434(c) and are otherwise subject to the re-

quirements of 11 CFR Part 109. The disclaimer requirements of 11 CFR 110.11 are applicable to such independent expenditures.

(C) Only that portion of such expenditures allocable to the presidential candidate shall be considered an in-kind contribution to the candidate and an expenditure chargeable against the candidate's expenditure limitation. Only that portion of an independent expenditure allocable to the presidential candidate shall be reportable as an independent expenditure.

(D) For purposes of 11 CFR 110.14(d)(2), "direct mail" means any mailing(s) by commercial vendors or any mailing(s) made from lists which were not developed by the delegate.

(e) *Delegate Committees.* Delegate committees as defined at 11 CFR 100.5(e)(5) which qualify as political committees under 11 CFR 100.5 and 2 U.S.C. 431(4) must register with the Commission pursuant to 11 CFR Part 102 and 2 U.S.C. 433, and must file reports of contributions received and expenditures made pursuant to 11 CFR Part 104 and 2 U.S.C. 434. Contributions to delegate committees are subject to limitation under 11 CFR 110.1 and 2 U.S.C. 441a(a). Contributions made by delegate committees are subject to limitations under 11 CFR 110.1 and 2 U.S.C. 441a(a).

(f) *Prohibited Sources.* All contributions to and expenditures by any delegate or by a delegate committee are subject to the prohibitions of 11 CFR 110.4(a) and Part 114 and 2 U.S.C. 441b and 441e.

(g) *Administrative Expenses of Party Committees and Payments to Qualify as Delegates.*—(1) Administrative expenses incurred by local, county, district or State party committees in connection with the sponsoring of conventions or caucuses during which delegates to a national nominating convention are selected, are not reportable under the Act; however, such expenses may not be paid from contributions or expenditures which are prohibited under 11 CFR 110.4(a) and Part 114 and 2 U.S.C. 441b and 441e.

(2) Payments to a State or district party committee by individuals for the purpose of qualifying as delegates would not be contributions or expenditures under the Act, nor would such payments be reportable under 11 CFR Part 104 and 2 U.S.C. 434 or subject to limitation under 11 CFR Part 110 and 2 U.S.C. 441a.

[48 FR 34097, May 23, 1983]

EXHIBIT G
Page 1 of 4

FEDERAL ELECTION COMMISSION

11 CFR Parts 100 and 110

[Notice 1980-21]

Contributions to and Expenditures by Delegates to National Nominating Conventions

AGENCY: Federal Election Commission.

ACTION: Final Rule; transmittal of Regulations to Congress.

SUMMARY: The Commission has transmitted regulations to Congress to govern the application of the Federal Election Campaign Act of 1971, as amended (2 U.S.C. 431 *et seq.*) to contributions to and expenditures by delegates to national party nominating conventions. The regulations set forth reporting obligations of delegates and delegate committees under the Act as well as treatment of contributions to and expenditures by delegates and delegate committees.

2 U.S.C. 438(d) requires that any rule or regulation proposed by the Commission to implement Chapter 14 of Title 2, United States Code be transmitted to the Speaker of the House and the President of the Senate prior to final promulgation. If neither House of Congress disapproves the regulation within 30 legislative days after its transmittal, the Commission may finally prescribe the regulation in question. The following regulations were transmitted to Congress on May 14, 1980.

EFFECTIVE DATE: Further action, including the announcement of an effective date will be taken after the regulations have been before Congress 30 legislative days in accordance with 2 U.S.C. 438(d).

FOR FURTHER INFORMATION CONTACT: Ms. Patricia Ann Fiori, Assistant General Counsel, 1325 K Street, N.W., Washington, D.C. 20463 (202) 523-4143.

SUPPLEMENTARY INFORMATION: On September 5, 1979, the Commission published an Advance Notice of Proposed Rulemaking on Contributions to and Expenditures by Delegates to National Party Nominating Conventions (44 FR 51962). The regulations transmitted to Congress incorporate suggestions received in response to the

ANPRM as well as provisions required by the enactment on January 8, 1980, of the 1979 Amendments to the Federal Election Campaign Act of 1971 (Pub. L. 96-187).

Under the regulations as proposed and transmitted to Congress, contributions to a delegate for the purpose of furthering that delegate's selection are not subject to the contribution limitations of 2 U.S.C. 441a(a)(1) and (2), but such contributions would still count against the individual contributor's aggregate contribution limit of $25,000 per calendar year under 2 U.S.C. 441a(a)(3). Also, contributions to a delegate by the campaign committee of a presidential candidate receiving public financing would count against that candidate's expenditure limitations.

Expenditures by delegates from their personal funds to defray the costs of advocating their own selection are not limited or reportable by the proposed rules. In addition, expenditures by delegates to defray the cost of certain campaign materials, such as pins, bumper stickers, handbills, brochures, posters and yard signs, which advocate the delegate's selection and also mention a presidential candidate are not limited provided the material is used in connection with volunteer activity. However, expenditures by delegates to defray costs incurred in the use of broadcasting, newspapers, magazines, direct mail or similar types of general public communication or political advertising which advocate the delegate's selection and which also mention a presidential candidate may result in an expenditure which would be either chargeable against the Presidential candidate's expenditure limits, an in-kind contribution by the delegate to the candidate, or an independent expenditure reportable by the delegate. The regulations provide that administrative expenses incurred by State and local party committees in connection with the sponsoring of conventions and caucuses are not reportable under the Act. Similarly, payments made by individuals to qualify as delegates would not be contributions or expenditures under the Act and need not be reported as such. In addition, the regulations define the term "delegate committee" and set out registration and reporting requirements for such committees.

The regulations provide that contributions to and expenditures made by delegates or by delegate committees are subject to the prohibitions of 2 U.S.C. 441b and 441e.

Explanation and Justification of Regulations Concerning Contributions to and Expenditures by Delegates to National Nominating Conventions

These regulations govern contributions to and expenditures by delegates and delegate committees at all levels of the delegate selection process. Funds received or expended to further the selection of a delegate are . . . contributions or expenditures under the Federal Election Campaign Act. Under 2 U.S.C. 431, the terms "contribution" and "expenditure" are defined, in part, to include amounts received or expended "* * * for the purpose of influencing any election for Federal office." 2 U.S.C. 431(8)(A)(i), 431(9)(A)(i). The term "election" is defined to include a national nominating convention, as well as any primary election held to select delegates to such a convention. 2 U.S.C. 431(1) (B) and (C). In addition, the term "federal office" includes the Office of President. 2 U.S.C. 431(3). Amounts received or spent to further the selection of a delegate are received or spent for the purpose of influencing a national nominating convention or for the purpose of influencing a primary election held to select delegates to such a convention. Hence, such amounts fall squarely within the definition of the terms "contribution" or "expenditure" under the Act.

The term "delegate" includes those individuals who seek to become delegates as well as those individuals who are selected as delegates. "Delegate committee" is defined as a political committee which receives contributions or makes expenditures for the purpose of influencing the selection of delegates to a national nominating convention and includes any group of individuals supporting delegates, as well as any group of individuals seeking selection as delegates.

If several persons acting as a group receive contributions or make expenditures in an aggregate amount exceeding $1,000 in a calendar year for the purpose of influencing the selection of any delegate(s), the group is a political committee as defined by 2 U.S.C. 431(4). A delegate committee would be treated as any other political committee is treated under the Act. Thus, delegate committees, by virtue of their status as political committees, must register and report their contributions and expenditures in accordance with 2 U.S.C. 433 and 434. Contributions made by such committees would be subject to limitation under 2 U.S.C. 441a(a); contributions to a delegate committee are subject to limitation under 2 U.S.C. 441a; and all expenditures by such committees must be reported in accordance with the provisions of 2 U.S.C. 434 and 11 CFR Part 104.

A delegate who acts as an individual to further his or her own selection is treated differently under the regulation than a delegate committee. While amounts received or spent by such a delegate are contributions or expenditures, a delegate is not a candidate under the Act. The term "candidate" is defined as "* * * an individual who seeks nomination for election, or election to Federal office * * *" 2 U.S.C. 431(2). Since a delegate does not seek nomination or election to a federal office, he or she is not a "candidate" under the Act.

The Act imposes limitations only on contributions to *candidates* or *political committees*. 2 U.S.C. 441a(a). Thus, contributions to a delegate to further his or her selection as a delegate are not limited by the Act. However, even though no limitation is placed on the amount of a contribution to a delegate, such contributions count against a contributor's $25,000 limitation under 2 U.S.C. 441a(a)(3). Moreover, because the Act imposes reporting requirements only on contributions to candidates and political committees, contributions to a delegate are not required to be reported. In addition, it should be noted that contributions made to a delegate for the purpose of furthering his or her selection are not considered contributions to any presidential candidate, regardless of whether or not the delegate is pledged to or supports a particular presidential candidate.

Because the Act imposes reporting requirements on expenditures by candidates or political committees, expenditures made by a delegate for the purpose of advocating only his or her own selection are neither limited nor reportable under the act. Examples of such expenditures are: travel and subsistence during the delegate selection process, including the national nominating convention; and the costs of any communications advocating only a delegate's selection. Moreover, expenditures of this type are not chargeable against the expenditure limitations of any presidential candidate under the Act.

The Act exempts from the definition of contribution and expenditure the payment by a "candidate * * * to any public office (including State or local office)" of the cost of certain campaign material such as pins, bumper stickers, handbills, brochures, posters and yard signs, which include reference to any other candidate for Federal office, provided that such campaign materials are used in connection with volunteer

activities. 2 U.S.C. 431(8)(B)(xi). This exemption was designed to permit candidates to seek office as a team. 123 Cong. Rec. H7828 (daily ed. Sept. 10, 1977) (remarks of Mr. Frenzel). Since similar campaign activity in the delegate selection process should be encouraged, the subsections governing expenditures by delegates incorporate this exemption.

Thus, expenditures made by a delegate to defray the costs of certain campaign materials (such as pins, bumper stickers, handbills, brochures, posters and yard signs) which advocate the selection of a delegate and which also include reference to any presidential candidate are not subject to limitation and need not be reported under the Act as long as the materials are used in connection with volunteer activities and further, that such expenditures are not for costs incurred for the use of broadcasting, newspapers, magazines, billboards, direct mail or other similar types of general public communication or political advertising.

Expenditures by a delegate to defray costs incurred in the use of broadcasting, newspapers, magazines, direct mail or similar types of general public communication or political advertising which advocate the delegate's selection and which also mention a presidential candidate are not limited or reportable unless the expenditures are either contributions in-kind to the presidential candidate or independent expenditures advocating the election of the presidential candidate. Delegate expenditures which qualify as in-kind contributions, that is, they are made by the delegate in cooperation, consultation or concert with, or at the request or suggestion of the candidate or his or her authorized political committee(s) are subject to contribution limitations, must be reported by the presidential candidate's authorized political committees and, are chargeable against the presidential candidate's statutory expenditure limitations.

Alternatively, expenditures by a delegate to defray the cost incurred in the use of broadcasting, newspapers, magazines, billboards, direct mail or similar types of general public communications or political advertising are independent expenditures if they are made to expressly advocate the election of a clearly identified presidential candidate and are not made with the cooperation or prior consent of or at the request or suggestion of the presidential candidate. If such independent expenditures by an individual delegate exceed $250 during a calendar year, the delegate must report them in accordance with the Act. (*See* 2 U.S.C. 434(c)).

The *general* prohibitions of 2 U.S.C. 441b on contributions and expenditures by corporations, labor unions, and national banks apply to all contributions to and expenditures by delegates and delegate committees.

Administrative expenses incurred by State and local party committees in connection with the sponsoring of conventions and caucuses are not reportable under the Act but they may not be paid with contributions which are otherwise prohibited by the Act.

Ballot fees paid to State or local party committees by individuals to qualify as delegates are not contributions or expenditures under the Act. Such payments are not subject to limitation under the Act and they need not be reported by the party committee.

11 CFR Chapter I is amended as follows:

PART 100—SCOPE AND DEFINITIONS (2 U.S.C. 431)

1. 11 CFR 100.5(e)(5) is added to read as follows:

§ 100.5 Political committee (2 U.S.C. 431 (4), (5), (6)).

* * * * *

(e) * * *

(5) *Delegate Committee.* A delegate committee is a political committee which receives contributions or makes expenditures for the purpose of influencing the selection of delegates to a national nominating convention. The term "delegate committee" includes a group of delegates, a group of individuals seeking selection as delegates and a group of individuals supporting delegates. (See definition of "delegate" at 11 CFR 110.14(b)(i).)

PART 110—CONTRIBUTION AND EXPENDITURE LIMITATIONS AND PROHIBITIONS

2. 11 CFR 110.5(d) is added to read as follows:

§ 110.5 Annual contribution limitation.

* * * * *

(d) Contributions to delegates or delegate committees count against the individual contributor's aggregate annual contribution limit in 11 CFR 110.5(a).

3. 11 CFR 110.14 is added to read as follows:

§ 110.14 Contributions to and expenditures by delegates.

(a) 11 CFR 110.14 applies to all levels of a delegate selection process and sets forth the prohibitions, limitations and requirements applicable under the Act to delegates.

(b) *Definitions.*—(1) *Delegate.* "Delegate" means an individual who becomes or seeks to become a delegate, as defined by State law or party rule, to a national nominating convention or to a State, district, or local convention, caucus or primary which is held to select delegates to a national nominating convention.

(2) *Delegate Committee.* A delegate committee is a political committee which receives contributions or makes expenditures for the purpose of influencing the selection of delegates to a national nominating convention. The term "delegate committee" includes a group of delegates, a group of individuals seeking selection as delegates and a group of individuals supporting delegates.

(c) *Contributions to Delegates.* Contributions to a delegate for the purpose of furthering that delegate's selection are not subject to the limitations of 11 CFR 110.1 and 110.2 and 2 U.S.C. 441a(a)(1) and (2); nor are such contributions reportable under 11 CFR Part 104 or 2 U.S.C. 434. (See 11 CFR 110.14(e) for limitations and reporting requirements relating to contributions to delegate committees.) However, if an individual makes such a contribution, it counts against that individual's aggregate contribution limit of $25,000 in a calendar year under 11 CFR 110.5 and 2 U.S.C. 441a(a)(3). Contributions made to a delegate by the campaign committee of a presidential candidate count against that presidential candidate's expenditure limitation under 11 CFR 110.8(a) and 2 U.S.C. 441a(b).

(d) *Expenditures by Delegates.*—(1) Expenditures by a delegate from contributions to him or her, or from personal funds, to defray costs incurred to advocate only his or her own selection are neither subject to limitations under 11 CFR Part 110 and 2 U.S.C. 441a nor reportable under 11 CFR Part 104 and 2 U.S.C. 434. (See 11 CFR 110.14(e) for reporting requirements relating to delegate committees.) Such costs may include but are not limited to: costs of travel and subsistence during the delegate selection process, including the national nominating convention, and the cost of any communications advocating only a delegate's selection. Such expenditures are also not chargeable against the expenditure limits of any presidential candidate under 11 CFR 110.8(a) or 2 U.S.C. 441a(b). (2)(i) Expenditures by a delegate from contributions to him or her or from personal funds for costs of certain campaign materials (such as pins, bumper stickers, handbills,

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brochures, posters and yard signs) which advocate the selection of a delegate and which also include information on or reference to any candidate for the office of President are not reportable by the delegate under 11 CFR Part 104 and 2 U.S.C. 434. (See 11 CFR 110.14(e) for reporting requirements relating to delegate committees.) Such expenditures are neither contributions to the presidential candidate subject to limitations under 11 CFR 110.1(a) and 2 U.S.C. 441a(a)(1) nor expenditures which count against the expenditure limitation of the presidential candidate under 11 CFR 110.8(a) and 2 U.S.C. 441a(b), provided that:

(A) Such materials are used in connection with volunteer activities; and

(B) Such expenditures are not for costs incurred in the use of broadcasting, newspapers, magazines, billboards, direct mail or similar types of general public communication or political advertising.

(ii) Expenditures by a delegate from contributions to him or her or from personal funds for costs incurred in the use of broadcasting, newspapers, magazines, billboards, direct mail or similar types of general public communication or political advertising which advocates the selection of a delegate and which also includes information on or reference to a candidate for the office of President are neither subject to limitations under 11 CFR 110.1(a) and 2 U.S.C. 441a(a)(1) and (2), nor reportable under 11 CFR Part 104 and 2 U.S.C. 434, except as provided 11 CFR 110.14(d)(2)(ii)(A)(B). (See 11 CFR 110.14(e) for reporting requirements relating to delegate committees.)

(A)(1) Such expenditures are subject to limitations if they are in-kind contributions to the presidential candidate. Such expenditures are in-kind contributions to the presidential candidate under 2 U.S.C. 441a(a)(7) if the delegate makes such expenditures in cooperation, consultation, or concert with, or at the request or suggestion of the presidential candidate, his or her authorized political committee(s), or their agents. Such an in-kind contribution is subject to the contribution limitations of 11 CFR 110.1 and 2 U.S.C. 441a(a)(1) and must be reported by the presidential candidate's authorized committee(s) as a contribution under 11 CFR Part 104 and 2 U.S.C. 434. Except as provided in 11 CFR 110.14(d)(2)(ii)(A)(3). Such in-kind contributions are chargeable against the presidential candidate's expenditure limitation under 11 CFR 110.8(a) and 2 U.S.C. 441a(b).

(2) If the delegate finances the dissemination, distribution or republication, in whole or in part, of any broadcast or materials prepared by the presidential candidate, his or her authorized committee(s) or their agents, such expenditure shall not be chargeable against that candidate's expenditure limitations unless it was made with the cooperation, or with the prior consent of, or in consultation with, or at the request or suggestion of, the candidate or any authorized agent or committee thereof.

(B) Such expenditures are not subject to limitations, but are reportable if they are independent expenditures. Such expenditures are independent expenditures under 11 CFR 109.1(a) and 2 U.S.C. 431(17), if they are made to expressly advocate the election of a clearly identified presidential candidate and are not made with the cooperation or with the prior consent of, or in consultation with, or at the request or suggestion of, the presidential candidate or authorized committee of such candidate. Such independent expenditures are not limited but must be reported by the delegate in accordance with 11 CFR 109.2 and 2 U.S.C. 434(c) and are otherwise subject to the requirements of 11 CFR Part 109. The disclaimer requirements of 11 CFR 110.11 are applicable to such independent expenditures.

(C) Only that portion of such expenditures allocable to the presidential candidate shall be considered an in-kind contribution to the candidate and an expenditure chargeable against the candidate's expenditure limitations. Only that portion of an independent expenditure allocable to the presidential candidate shall be reportable as an independent expenditure.

(D) For purposes of 11 CFR 110.14(d)(2), "direct mail" means any mailing(s) by commercial vendors or any mailing(s) made from lists which were not developed by the delegate.

(e) *Delegate Committees.* Delegate committees as defined at 11 CFR 100.5(e)(5) which qualify as political committees under 11 CFR 100.5 and 2 U.S.C. 431(4) must register with the Commission pursuant to 11 CFR Part 102 and 2 U.S.C. 433, and file reports of contributions received and expenditures made pursuant to 11 CFR Part 104 and 2 U.S.C. 434. Contributions to delegate committees are subject to limitation under 11 CFR 110.1 and 2 U.S.C. 441a(a). Contributions made by delegate committees are subject to limitations under 11 CFR 110.1 and 2 U.S.C. 441a(a).

(f) *Prohibited Sources.* All contributions to and expenditures by any delegate or by a delegate committee are subject to the prohibitions of 11 CFR 110.4(a), Part 114 and 2 U.S.C. 441b and 441a.

(g) *Administrative Expenses of Party Committees and Payments to Qualify as Delegates.* (1) Administrative expenses incurred by local, county, district or State party committees in connection with the sponsoring of conventions or caucuses during which delegates to a national nominating convention are selected, are not reportable under the Act; however, such expenses may not be paid from contributions or expenditures which are prohibited under 11 CFR 110.4(a) and Part 114 and 2 U.S.C. 441b and 441a.

(2) Payments to a State or district party committee by individuals for the purpose of qualifying as delegates would not be contributions or expenditures under the Act, nor would such payments be reportable under 11 CFR Part 104 and 2 U.S.C. 434 or subject to limitation under 11 CFR Part 110 and 2 U.S.C. 441a.

Dated: May 19, 1980.

Max L. Friedersdorf,

Chairman, Federal Election Commission

[FR Doc. 80-15715 Filed 5-22-80; 8:45 am]
BILLING CODE 6715-01-M

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Executive Session
February 20, 1980

EXHIBIT H

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

FIRST GENERAL COUNSEL'S REPORT

ATE AND TIME OF TRANSMITTAL
Y OGC TO THE COMMISSION FEB 20 1980

MUR # 1167, 1168, 1170
DATE COMPLAINT RECEIVED
BY OGC 2/19/80

STAFF MEMBER Oliphant

OMPLAINANT'S NAME: #1167 - Arthur B. Culvahouse, Gen. Counsel, The Baker Comm.
#1168 - Joann McSorley, Asst. Treas., Dole for Pres. Comm.
#1170 - Daniel V. Swillinger, Gen. Counsel, Anderson for Pres. Comm.

ESPONDENT'S NAME: Telegraph Publishing Company
Nashua Telegraph
Nashua, New Hampshire

ELEVANT STATUTE: 2 U.S.C. § 441b

NTERNAL REPORTS CHECKED: Presidential candidate allocations to New Hampshire

EDERAL AGENCIES CHECKED: None

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SUMMARY OF ALLEGATIONS

On February 19, 1980, complaints were filed by the Baker Committee (MUR 1167), the Dole for President Committee (MUR 1168), and the Anderson for President Committee (MUR 1170) against the Telegraph Publishing Company which publishes the Nashua Telegraph, Nashua, New Hampshire. All three complaints allege that the Nashua Telegraph is staging a debate between Ronald Reagan and George Bush on February 23, 1980, that the debate will be partisan in that it will promote the candidacies of those two candidates over other major Republican contenders, and that expenditures in connection with the debate are, therefore, prohibited corporate contributions under 2 U.S.C. § 441b. The Baker and Dole complaints allege that

the respective candidates requested inclusion in the Nashua Telegraph debate and were refused.

The Baker Committee requests that the Commission immediately seek injunctive relief to prevent a violation of the Act. The Dole for President Committee requests that the Commission immediately find probable cause to believe a violation is about to occur and file a civil action for injunctive and declaratory relief, without following the enforcement procedures set forth in 2 U.S.C. § 437g, on the grounds that irreparable harm will occur if the Commission does not act immediately. The Anderson for President Committee asks that an expedited proceeding be held and that the Commission seek an injunction under 2 U.S.C. § 437g to bar the debate if the Commission concludes that staging of the debate violates 2 U.S.C. § 441b.

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FACTUAL AND LEGAL ANALYSIS

1. 2 U.S.C. § 441b prohibits the corporate press from making expenditures to stage candidate debates.

The initial question presented by the complaints is whether the expenditure of funds by a newspaper to stage a debate violates 2 U.S.C. § 441b.

In 1974, section 102(c) of H.R. 16090 (the House version of the FECA amendments) included an amendment to 18 U.S.C. § 591(f) relating to the definition of expenditure, adding several exceptions to that definition, including the news story exemption as it currently reads in 2 U.S.C. § 431(f)(4)(A). The House Report, No. 93-943, 93d Cong., 2d Sess. at 4 (1974) stated:

> Clauses (A), (B) and (C) of subparagraph (4) underscore and reaffirm the principles stated in the amendment to section 610 of title 18, United States Code, proposed by Representative Orval Hansen, and passed by the Congress as part of the Act. Those clauses make it plain that it is not the intent of the Congress in the present legislation to limit or burden in any way the first amendment freedoms of the press and of association. Thus, clause (A) assures the unfettered right of the newspapers, TV networks, and other media to cover and comment on political campaigns. (emphasis added)

The exemption itself refers specifically to news stories, commentaries and editorials, and as the explanation contained in the House Report makes clear, it is the right of the media to cover and comment on election campaigns which is protected. Thus, although expenditures incidental to carrying on the ordinary functions of the media are not "expenditures" within the meaning of the Act, the exemption does not exclude the media itself wholly from the provisions of the Act, including those prohibitions contained in 2 U.S.C. § 441b. Accordingly 2 U.S.C. § 431(f)(4)(A) and 2 U.S.C. § 441b, read in conjunction, permit the media to expend funds to cover stories concerning an election, publish a newspaper or make a broadcast concerning an election, publish or broadcast commentaries on the election or on specific candidates, and editorialize about or endorse candidates for election without violating 2 U.S.C. § 441b.

Review of the legislative history of the predecessor statutes to 2 U.S.C. § 441b makes clear that the general prohibition on corporate political contributions and expenditures was intended to apply to the corporate press, except insofar as their activities were protected from governmental regulation by the first amendment (and as codified in 2 U.S.C. § 431(f)(4)(A)).

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The legislative history of the Taft Hartley Act (Labor Management Relations Act of 1947 (61 Stat. 159), which amended Section 313 of the Federal Corrupt Practices Act adding prohibitions on labor union political activity to parallel the corporate prohibitions originally enacted in the Tillman Act of 1907, sheds some light on the extent of the news story exemption of § 431(f)(4)(A). During the Senate debates on the amendment, there was discussion concerning the scope of its applicability and its effect on freedom of the press. It is clear from the debate that Congress believed that § 441b (then § 313 of the Federal Corrupt Practices Act, and later 18 U.S.C. § 610) did not prohibit the institutional press only insofar as they were operating normally as newspapers. 1/

> "If the paper...is operated independently, if it derives its money from its subscribers, then of course there would be no violation.. They could not publish a special newspaper [in support of one candidate over another]...None of us have ever assumed that the Corrupt Practices Act prevented a newspaper from writing editorials for or against any candidate....If they are sold to subscribers and if the newspaper is supported by subscriptions, then I would not say that constituted such an expenditures. But if the newspaper were given away--even an ordinary newspaper--I think that would violate the Corrupt Practices Act. That act would be violated, it seems to me, if such a newspaper were given away as a political document in favor of a certain candidate." 93 Cong. Rec. 6436, 6437, 6438. (remarks of Sens. Taft and Barkley) (June 5, 1947).

Thus, it is the ordinary "operation of the newspaper itself" (93 Cong. Rec. 6437) which is outside the prohibition now contained in 2 U.S.C. § 441b.

The first amendment protects the media from governmental restrictions on those functions crucial to a free press. The news

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1/ There was no comparable news story exemption at that time.

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story exemption in 2 U.S.C. § 431(f)(4)(A), itself very narrowly drawn, refers only to news stories, commentaries and editorials. It provides that funds incidental to the publishing of news stories, commentaries or editorials are not "expenditures" within the meaning of the Act.

However, to the extent that broadcasters, newspapers and periodicals function as do other business corporations, they are subject to the provisions of § 441b. In labor relations, anti-trust activities, etc., they are subject to the same restrictions as any corporation.[2/] For example, § 441b prohibits a newspaper from taking general treasury funds and making contributions to a campaign — even though the newspaper may endorse that same candidate. Nor may a newspaper rent a billboard to display its editorial endorsement or charter an airplaine to fly over the city displaying a message notifying the city of its endorsement. There is no absolute constitutional protection for press corporations to be freed from all government regulation.

Even where political activity is nonpartisan in nature, Congress has determined that the danger of undue corporate or labor influence in the political process is sufficient to warrant restrictions on such activity. For example, although corporations and labor organizations may sponsor nonpartisan registration and get-out-the-vote

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2/ The corporate press has been found subject, inter alia, to the jurisdiction of the NLRB (Associated Press v. NLRB, 301 U.S. 103 (1937)), to ordinary forms of taxation (Grosjean v. American Press Co., 297 U.S. 233, 250 (1936)), to antitrust regulation (Associated Press v. U.S., 326 U.S. 1 (1945)), and to certain restrictions on presentation of paid advertising (Pittsburgh Press Co. v. Human Relations Commission, 413 U.S. 376 (1973)).

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drives, they may only direct those efforts at the general public if the drive is jointly sponsored with a civic or nonprofit organization which does not support or endorse candidates. 2 U.S.C. § 431(f)(4)(B); 11 CFR § 114.4(d). Thus, while recognizing the educational and civic value of such nonpartisan activities, Congress did not intend to give corporations and labor organizations free reign to engage therein without the additional protection of sponsorship by a bona fide nonpartisan group.

It is, therefore, clear that the expenditure of funds by a news media corporation to stage a candidate debate is a corporate contribution prohibited by 2 U.S.C. § 441b. All three complaints allege that the Nashua Telegraph will expend funds to stage a debate and, therefore, without regulations in effect governing the conduct of candidate debates, both complaints set forth facts which give reason to believe a violation of 2 U.S.C. § 441b is about to be committed.

The prohibition of 2 U.S.C. § 441b is against the expenditure of funds in connection with an election. None of the complaints allege how much money the Nashua Telegraph is expending to stage the debate, but the figure would at least include any sums spent organizing and planning, including staff time, direct expenditures for the purpose of hiring the hall, publicity costs to advertise the debate, and any payments for costs incurred by persons participating therein, including candidates and questioners. If the Commission finds reason to believe or otherwise intends to seek relief, the notifica-

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tion of such action should be accompanied by questions to ascertain the amount of money involved. Of course, the value of the in-kind provision of such a forum as a candidate debate which will receive national or state-wide television coverage may exceed the actual dollars spent.

2. Even if applicable, the Commission's debate regulations which, when approved, will create an exemption from 2 U.S.C. § 441b for media sponsorship of nonpartisan candidate debates, would not permit news media corporations to make expenditures for partisan debates which promote the candidacies of some candidates over others.

The Commission's debate regulations have not been before Congress for the requisite thirty legislative days, and are therefore not applicable to the debate scheduled by the Nashua Telegraph on February 23, 1980. These regulations when effective will permit news media corporations to make expenditures to stage candidate debates provided that the debates are nonpartisan in that they do not promote or advance one candidate over another. The explanation and justification of the Commission's proposed debate regulations states in pertinent part as follows:

> Under subsection (b) the precise structure of candidate debates is left to the discretion of the staging organization. Such debates must, however, be nonpartisan in nature and they must provide fair and impartial treatment of candidates and parties. The primary question in determining nonpartisanship is the selection of candidates to participate in such debates.
>
> Although the section does not prescribe specific requirements for selection of candidates to participate, a general election debate may not be structured so as to

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promote one candidate over another. An organization staging a debate may invite candidates to participate in a debate on the basis of party affiliation. Hence, such an organization could stage a general election debate to which only major party candidates are invited.

For debates at the primary, caucus or convention level, a staging organization may restrict participation to candidates seeking the nomination of one party. Moreover, if a sponsor restricts participation to candidates seeking the nomination of one party, there would be no requirement to stage a debate for candidates seeking the nomination of any other party. However, any debate held for primary, caucus or convention candidates may not promote one candidate over another.

A debate is nonpartisan if it is for the purpose of educating and informing the voters, provides fair and impartial treatment of candidates, and does not promote or advance one candidate over another.

Even though these regulations are not yet in effect, if a news media corporation staged a debate which would be permissible under the regulations, the Commission should permit such a corporation to now take advantage of the exemption which will be created in the regulations. Therefore, even though the regulations are inapplicable, the structure of this proposed debate should be examined in light of the standard set forth therein.

The Nashua Telegraph invited only Ronald Reagan and George Bush to participate in the February 23 debate, and based upon the allegations in the complaints, has refused requests to permit Senator Robert Dole and Senator Howard Baker to participate, and has failed to invite any other candidate to appear. Dole, Baker and Anderson are qualified to be on the ballot for the February 26 New Hampshire primary,[3/] are receiving and expending primary

3/ There are seven Republicans qualified to be on the ballot in New Hampshire on February 26.

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matching funds in the State of New Hampshire, are actively campaigning in the State of New Hampshire, and desire to participate in the February 23 debate. The exclusion of at least these three candidates is evidence that the newspaper is not providing fair and impartial treatment of candidates, and that the debate will result in the promotion or advancement of the included candidates over Senators Baker and Dole, and Representative Anderson. Thus, even if the regulations were applicable, and news media corporations could stage candidate debates, all three complaints give the Commission reason to believe that the February 23 debate as planned by the Nashua Telegraph would not be nonpartisan and would be in violation of 2 U.S.C. § 441b.

3. Relief Sought.

All three complaints seek to have the Commission expedite its enforcement procedures and to file suit for injunctive relief. Thus, the Commission must consider whether or not, consistent with the Act, its compliance procedures can be expedited in a case immediately prior to an election where irreparable harm will occur absent Commission action. In addition, the Commission must consider whether or not it should seek injunctive relief, either after a finding of reason to believe or under its 437d powers without such a finding.

A. Expedited Compliance Procedures.

Since the Amendments of P.L. 96-187, the Commission has not adopted revised expedited enforcement procedures. One 1979 amend-

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ment to the enforcement procedures makes a substantial change from the former version of the statute--i.e., the provision requiring that a respondent be afforded a fifteen day opportunity to demonstrate that no action should be taken. These complaints raise the question of whether or not the Commission is thereby precluded from taking any action prior to the expiration of fifteen days--even in the event that extraordinary circumstances exist.

There is no illuminating legislative history on the question. The Commission has always followed expedited compliance procedures prior to elections and there is no indication that Congress sought to eliminate such handling of complaints. Rather, it seems that the ramifications of requiring the fifteen day period were not fully thought out, particularly in cases such as this where the putative respondent is not a candidate and the persons allegedly harmed are candidates participating in an imminent election.

It is unclear whether or not the mandatory requirement that the Commission wait fifteen days prior to taking action on the basis of a complaint was intended to cover requests for injunctive relief against future violations. 2 U.S.C. § 437g(a)(1) which governs the filing of a complaint and includes the fifteen day period does not refer to allegations that the Act is about to be violated, but rather speaks only of past violations. Section 437g(a)(2) provides that the Commission may find reason to believe a violation has been committed or is about to be committed. In many instances such as this one, insufficient advance warning that a violation is about to occur may make it impossible to follow the time strictures.

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Thus, it is reasonable to interpret the strict fifteen day deadline as not applicable to violations about to occur, but rather as applicable only to past violations. This is certainly so in instances where the Commission (and/or a complainant) could not attempt to correct a violation if the time requirements were strictly adhered to, and where it was impossible for a complainant or the Commission to discover in time that such a violation is about to occur. This interpretation is buttressed by the Commission's powers set forth in 2 U.S.C. § 437d(a)(6) to seek injunctive relief to prevent a violation

It would seem that the Commission could shorten the fifteen day opportunity where compelling reasons exist, provided that the standard for such shortening was sufficiently high to limit it to only the most extraordinary circumstances. Of course, any such deviation from ordinary procedures is subject to challenge by a respondent. Thus, we recommend that the Commission, if it wishes to expedite its compliance procedures in such extraordinary circumstances, adopt a standard such as that required in order to obtain a temporary restraining order from a court. By this standard the Commission would shorten the time for response only when:

(1) There is a substantial likelihood that the complaint sets forth a violation of the Act;

(2) Failure of the Commission to act expeditiously will result in irreparable harm to the complainant or some other party;

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(3) Expeditious action will not result in undue harm or prejudice to the interests of other persons;

(4) The public interest would be served by such expeditious handling of the matter.

Under this standard, this case would be one in which expedited procedures would be permissible. (1) The complaints give reason to believe that the Act will be violated. (2) The remedy sought by Senators Baker and Dole and Representative Anderson will be impossible to achieve and they will be irreparably harmed if the Commission does not obtain compliance with the Act prior to the commission of a violation. Inclusion in the debate is the only remedy which will prevent a violation. (3) Obviously, the Nashua Telegraph may suffer some disadvantage from a shortened response time. However, the newspaper is aware that other candidates have requested participation in the debate, and, it is likely that the newspaper was specifically advised of the Federal Election Commission regulations on the subject. Thus the newspaper has, in all likelihood, received notice of the possibility of a violation. No other persons are likely to be harmed by the Commission's expedition of its procedures. (4) Clearly, the balance is in favor of the public interest in handling these matters expeditiously. The public interest, as expressed by the Commission in the explanation and justification of the proposed debate regulations, is in insuring that fair and impartial treatment be accorded to candidates while permitting candidates to communicate their

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views to the public. A debate which does not provide such fair and impartial treatment would harm the public interest in addition to specifically disadvantaging the complainant-candidates.

Thus, the circumstances of this case would meet the criteria of such a test, should the Commission decide to expedite its consideration.

B. Injunctive Relief

Whether or not the Commission finds reason to believe, the Commission's powers to seek injunctive relief would permit it to file suit to seek a temporary restraining order and an injunction. As to immediate injunctive relief, there are two major alternatives available, provided that at least four Commissioners reach agreement that the debate as currently planned would be in violation of 2 U.S.C. § 441b:

(1) Find reason to believe and authorize seeking injunctive relief.

(2) Make no finding prior to the fifteen days, but authorize seeking injunctive relief, pending Commission determination of reason to believe.

In any event, if the Commission wishes to seek an injunction, it should be specifically authorized, separate and apart from any finding of reason to believe.

(1) If the Commission expedites its enforcement procedures and makes a finding of reason to believe, we recommend that the Commission grant authorization to file an action seeking a mandatory injunction that the newspaper permit the participation of the

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other candidates who are qualified to be on the ballot as Republicans, are receiving and expending matching funds in the State of New Hampshire, are actively campaigning in the State of New Hampshire and who wish to participate in the debate.

Such action will in all likelihood be challenged on the grounds that the Commission did not comply with its enforcement procedures, so it is important that the authorization to seek an injunction not be tied to the finding of reason to believe. Rather, the injunction would be sought to preserve the Commission's ability to seek meaningful relief.

Although finding reason to believe and seeking an injunction would be subject to the challenge concerning enforcement procedures set forth above, it may increase the chances of the Commission obtaining an injunction, since the likelihood of existence of a violation will weigh heavily in a court's decision to grant the injunction.

(2) The Commission need not find reason to believe and may still seek an injunction pursuant to its powers to prevent violations of the Act. One possible advantage of this alternative would be to minimize a challenge to improper enforcement procedures. On the other hand, the Commission's powers to seek relief absent any finding may also be subject to challenge. Again, an injunction would be sought in order to preserve the Commission's ability to meaningfully address the complaints filed by the candidates involved.

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RECOMMENDATION

Provided that the Commission, upon agreement of at least four members, determines that the February 23 debate as allegedly planned would violate 2 U.S.C. § 441b if it proceeds, there seem to be the following alternatives available, since the Commission has specifically been requested by all three complainants to take some action immediately:

1. Deny the requests for expedited consideration and handle the MURs in the ordinary course. If this alternative is adopted, the complainants should be notified immediately that their requests for expedited handling were denied; 4/

2. Find reason to believe immediately and authorize filing of a suit seeking injunctive relief (either mandatory to include the other candidates or, prohibitory against the conduct of the debate); and

3. Make ~~no finding~~ (sequentially) but authorize filing a suit for injunctive relief as in (2).

If the Commission proceeds in any manner, information concerning the details of the funding of the debate should be sought immediately.

4/ The complainants, or any one of them, may seek injunctive relief on their own initiative. If so, the Commission should intervene on the grounds that it has exclusive jurisdiction over civil enforcement of the Act. In that event, the Commission will in all likelihood have to take a position on the propriety of injunctive relief, even if the Commission did not originally seek it.

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In addition, any further notification to the respondent should be by telegram in order to provide the fullest opportunity possible for a response. Even if the Commission determines to seek immediate court relief without finding reason to believe, the respondent should be so notified, in order to make certain that there is an opportunity to settle the matter prior to filing in court.

Attachments: 3 complaints
Telegram to Respondent

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MURS 1167, 1168, 1170
Telegraph Publishing Company)
Nashua Telegraph)

CERTIFICATION

I, Marjorie W. Emmons, Recording Secretary for the Federal Election Commission's Executive Session on February 20, 1980, do hereby certify that the Commission decided by a vote of 4-2 to find reason to believe that the Telegraph Publishing Company and the Nashua Telegraph are about to violate the non-partisan requirement laid down by the Commission and 2 U.S.C. §441b, and authorize the General Counsel to seek immediate injunctive relief in court to prevent the violation.

Commissioners Aikens, Friedersdorf, Reiche, and Tiernan voted affirmatively for the decision; Commissioners Harris and McGarry dissented.

2/21/80
Date

Attest:

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

8504050295

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 20, 1980

TELEGRAM TO:

Telegraph Publishing Company
60 Main Street
Nashua, New Hampshire 03060

Re: MURs 1167, 1168, 1170

Dear Sir or Madam:

The Federal Election Commission notified you by Federal Express on February 19, 1980, of three complaints which allege that the Telegraph Publishing Company and the Nashua Telegraph are about to commit a violation of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). Copies of these complaints were forwarded to you at that time. The Commission has considered these complaints together and all three complaints requested that the Commission expedite its enforcement procedures and seek immediate injunctive relief to prevent a violation of the Act.

Upon review of the allegations contained in the complaints, the Commission, on February 20, 1980, determined that there is reason to believe that the Telegraph Publishing Company and the Nashua Telegraph are about to violate 2 U.S.C. § 441b and authorized the General Counsel to seek immediate injunctive relief in court to prevent the violation. Specifically, it appears that the Telegraph Publishing Company and the Nashua Telegraph are sponsoring and conducting a debate between George Bush and Ronald Reagan, two candidates for the Republican Presidential nomination and have specifically refused to allow other Republican candidates to participate. 2 U.S.C. § 441b prohibits a corporation from making contributions or expenditures in connection with federal elections. 2 U.S.C. § 431(9)(B)(i) exempts from the definitions of contribution and expenditure only those payments by a news media corporation related to the printing or broadcast of news stories, commentaries and editorials. Expenditures by news media corporations related to the staging of candidate debates are, thus, prohibited by

8504050029 3

2 U.S.C. § 441b. As the debate is scheduled for February 23, 1980, the Commission has determined that the matter warrants expedited treatment.

Because of the shortness of time involved, the Commission asks that you immediately prepare answers to the following:

(1) Is the debate still scheduled to proceed as alleged in the complaints filed with the Commission?

(2) The names of any persons who requested that they be allowed to participate in the debates and whose requests were rejected.

(3) The total amount of money the Telegraph Publishing Company and/or the Nashua Telegraph have expended and/or plan to expend in sponsoring and conducting the debate.

In order to avoid delay, we ask that you telephone your responses to Ms. Lyn Oliphant, the attorney assigned to this matter, as soon as possible, but no later than 2:00 p.m. February 21, 1980. Ms. Oliphant may be reached at (202) 523-4175. You may, of course, submit any additional information you believe relevant to this matter.

Finally, we wish to assure you that the Commission has not determined that there is probable cause to believe a violation of the Act has occurred and that you will be given a full opportunity to respond to the complaints. The Commission would not pursue its finding of reason to believe if the Nashua Telegraph were to satisfy the requirement for nonpartisanship of debates staged by news media corporations by extending invitations to additional candidates, including those who are qualified to be on the ballot for the Republican primary, are eligible to receive federal matching funds and are actively campaigning in the State. However, because the debate is scheduled for this Saturday, the Commission has felt it necessary to proceed in this expedited manner and to authorize the General Counsel to ask the court, if necessary, for injunctive relief to prevent a violation from occurring.

Sincerely,

Robert O. Tiernan

Robert O. Tiernan
Chairman

8504050297

WFA096(2322)([redacted]343A052)PD 02/21/80 232[redacted] 22 FEB 1980
1980 FEB 21 PM 11:46

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09731 WASHINGTON DC 02-21 1112P EST
ICS IPMWFOB
4-0505-05052 02/21/80
ICS IPMTZZ CSP
6038923491 TDMT NASHUA NH 242 02-21 0550P EST
PMS FEDERAL ELECTION COMMITTEE ATTN ROBERT O TIERNAN, DLR, DLR
1325 K ST
WASHINGTON DC 20463
DEAR CHAIRMAN TIERNAN:

THE TELEGRAPH PUBLISHING COMPANY REPLIES AS FOLLOWS TO YOUR TELEGRAM OF FEBRUARY 20 1980:

1. THE NASHUA TELEGRAPH HAS INVITED AMBASSADOR GEORGE BUSH AND

western union **Telegram**

GOVERNOR RONALD REAGAN TO PARTICIPATE IN A CANDIDATE DEBATE TO BE SPONSORED, BUT NOT FINANCED BY IT ON FEBRUARY 23, 1980 IN NASHUA, NEW HAMPSHIRE AND EACH SUCH CANDIDATE HAS ACCEPTED THE INVITATION.

2. THE NASHUA TELEGRAPH HAS EITHER DIRECTLY OR INDIRECTLY RECEIVED REQUESTS FOR ALL OF THE OTHER REPUBLICAN PRIMARY CANDIDATES ON THE BALLOT FOR THE NEW HAMPSHIRE REPUBLICAN PRESIDENTIAL PRIMARY TO BE CONDUCTED ON FEBRUARY 26, 1980, TO PARTICIPATE IN SUCH DEBATES. SUCH REQUESTS HAVE NOT BEEN GRANTED.

3. THE TELEGRAPH PUBLISHING COMPANY AND/OR THE NASHUA TELEGRAPH HAS NOT EXTENDED, NOR DOES IT PLAN TO EXTEND, ANY OF ITS FUNDS IN SPONSORING AND CONDUCTING THE DEBATE FOR WHICH IT WILL NOT BE FULLY REIMBURSED. REPRESENTATIVES FROM GOVERNOR RONALD REAGAN HAS AGREED TO

western union **Telegram**

ADVANCE TO THE TELEGRAPH PUBLISHING COMPANY THE SUM OF $3,500 TO BE USED TOWARDS SUCH EXPENSES AS MAY BE INCURRED BY THE COMPANY IN SPONSORING AND CONDUCTING THE DEBATE. IN CONCLUSION BOTH CASH DISPERSEMENTS BY THE COMPANY AS WELL AS TIME EXTENDED BY EMPLOYEES OF THE COMPANY DIRECTLY ON THE DEBATE. THE COMPANY ESTIMATES THAT SUCH EXPENSES WILL NOT EXCEED SUCH AMOUNTS THE COMPANY CONSIDERED THAT THE CONDITIONS OF THIS DEBATE IN THE ABOVE MANNER IS IN FULL COMPLIANCE WITH THE APPLICABLE LAWS, RULES, AND REGULATIONS. PLEASE ADVISE
VERY TRULY YOURS
DAVID P HAMBLETT PRESIDENT NASHUA TELEGRAPH PUBLISHING CO

2141 EST.
NNNN

RECEIVED
GENERAL COUNSEL

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 21, 1980

TELEGRAM

David C. Hamblett
President
Telegraph Publishing Company
60 Main Street
Nashua, New Hampshire 03060

Re: MURs 1167, 1168, 1170

Dear Mr. Hamblett:

On the basis of the information you provided to the Commission by telephone to be confirmed by telegram on February 21, 1980, the Commission has determined to take no further action in the above-referenced matters and has closed the files.

Sincerely,

Charles N. Steele
General Counsel

8504050300

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MURS 1167, 1169, 1170
Telegraph Publishing Company)
Nashua Telegraph)

CERTIFICATION

I, Marjorie W. Emmons, Recording Secretary for the Federal Election Commission's Executive Session on February 21, 1980, do hereby certify that the Commission decided by a vote of 4-0 to take no further action and close the file on the above-captioned matter on the basis of information received from the respondent.

Commissioners Aikens, Friedersdorf, Reiche, and Tiernan voted affirmatively for the decision; Commissioners Harris and McGarry abstained in the vote.

Attest:

2/21/80
Date

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

8504050030 1

MUR 1667 additional respondents

	Name	Why
2 ctes	Wisconsin At-Large Delegates Mondale Cte 126 Sunny Meade Lane, No. 6 Madison, WI 53713 Rick Asplund, Treasurer C00180687	(page 6, supp., Exh. C) reproduction of candidate materials
1 cte	Mondale Delegates -- DC Committee 1200 Massachusetts Avenue, NW Washington, DC 20005 (not registered even though § 441d notice says so)	(page 7, supp, Exh D) material primarily devoted to Mondale
21 ctes	Illinois (because there is no at-large committee and no specific committee named, I would recommend that we send notices to all 21 committees or to none of them at this time)	(pp 11-12 of the complaint)
31 ctes	New York At-Large Delegates 153 East 53rd Street New York, NY 10022 Chester J. Straubb, Treasurer C00181016	(page 12, complaint, Exh.D) material primarily devoted to Mondale
21 ctes	Delegates At-Large for Mondale 1418 Walnut Street Philadelphia, PA 19103 Joanne B. Ciulla, Treasurer C00180679	(pages 3&7, supp, Exh. A) coordination, direction & control of the state's other delegate committees

8504030402

FEDERAL ELECTION COMMISSION

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

8504050003 03

THIS IS THE BEGINNING OF MUR # 1704

Date Filmed 1/4/85 Camera No. --- 2

Cameraman AS

FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 1704

Date Filmed 1/4/85 Camera No. --- 2

Cameraman AS

8502400301

MUR 1704

FEDERAL ELECTION COMMISSION

Internal documents (including route slips, etc.); banking information; conciliation materials; identical duplicates

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

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

Signed Robert Bonham

date 12/27/84

FEC 9-21-77

8504050303

SENSITIVE

Lerner

RECEIVED BY THE FEC

84 DEC 17 A 9:41

LAW OFFICES

WILLIAMS & CONNOLLY

HILL BUILDING

839 SEVENTEENTH STREET, N.W.

WASHINGTON, D. C. 20006

AREA CODE 202
331-5000

EDWARD BENNETT WILLIAMS
PAUL R. CONNOLLY (1922-1978)
ROBERT A. SCHULMAN
VINCENT J. FULLER
RAYMOND W. BERGAN
STUART E. SEIDEL
JEREMIAH C. COLLINS
ROBERT L. WEINBERG
DAVID POVICH
STEVEN H. UNIN
JOHN W. WARDMAN, JR.
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PHILIP J. WARD
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FREDERICK WHITTEN PETERS

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LON S. BABBY
SCOTT BLAKE HARRIS
MICHAEL S. SUNDERMEYER
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STEVEN R. KUNEY
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SARAH H. DUGGIN
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TREVOR W. SWETT, III
ROBERT H. SAUNDERS
P. MICHELE ELLISON
LINDA C. RAY
MARY G. CLARK
MICHAEL P. MADOW *
LYNN A. STOUT
MARK S. LEVINSTEIN
JEFFERY D. UBERSAX
DIANNE S. McGANN
GEORGE ELLARD **
DANIEL F. KATZ ***

COUNSEL
HAROLD UNGAR
LYMAN G. FRIEDMAN
DONALD E. SCHWARTZ

* MEMBER NY BAR ONLY
** MEMBER PA BAR ONLY
*** MEMBER MD BAR ONLY

December 4, 1984

Charles N. Steele
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20005

Re: MUR 1704 and MUR 1667

Dear Mr. Steele:

Thank you for your letter of November 30, 1984, advising that the Commission voted to take no further action with respect to the Arlington Mondale Delegate Committee and Ann M. Yarborough, Treasurer. The legal and factual position of the Committee and Mrs. Yarborough is already on file, and we regard the Commission's action as set forth in your letter as a full vindication of this position.

Sincerely yours,

Robert L Weinberg

Robert L. Weinberg

Counsel for Ann M. Yarborough,
Treasurer, Arlington Mondale
Delegate Committee

8504050030 5

RECEIVED AT THE FEC
6a # 3273
84 MAY 22 A8:37

May 18, 1984

92 MAY 22 P8:26
92 MAY 22 P11:41

Mr. Stephen Mims
Federal Election Commission
Washington D.C. 20403

Dear Mr. Mims:

Regarding your letter of May 4, 1984, Re: MUR1667, I am requesting a fifteen day extension to respond. As the volunteer treasurer of the delegate selection committee, I have tried to understand the scope and circumstances of the complaint. It has become apparent to me that I should consult legal counsel. Unfortunately, the attorneys in Milwaukee familiar with the FEC regulations are associated with the Hart campaign. I am trying to contact a gentleman in Madison to see if he can represent the committee. As you can imagine trying to do this while fulfilling the travel requirements of my employment is difficult.

Thank you for your consideration.

Sincerely,

Kevin D. O'Connor
Treasurer
5th Congressional District

KDO/bd

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84 MAY 23 AM 8:37

8504058409

Mr. Stephen Mims
Federal Election Commission
Washington D.C. 20403

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HAND DELIVERED
84 MAY 25 AM 11:16
GCC#3312

SMOLER, ALBERT & ROSTAD

ATTORNEYS AT LAW

119 MONONA AVENUE - SUITE 220

MADISON, WISCONSIN 53703

WILLIAM W. SMOLER
JOHN C. ALBERT
THOMAS J. ROSTAD
C. WILLIAM POUST
KENNETH J. DORAN

TELEPHONE
608/255-8000

May 23, 1984

mims

84 MAY 25 AM 11:16

Attorney Charles M. Steele
Federal Elections Commission
1325 K Street NW
Washington, DC 20463

RE: MUR 1667

Dear Mr. Steele:

This letter constitutes the response of Richard (Rick) Asplund to the complaint filed by Americans With Hart, Inc., against Mondale for President Committee, Inc., MUR 1667. Mr. Asplund was apparently made a respondent by administrative determination, and first served with the complaint by a letter from the Commission dated April 26, 1984.

It must be noted at the outset that however large the scope of this matter, the record is devoid of any evidence connecting Mr. Asplund with any delegate committee other than the Wisconsin At-Large Delegate Mondale Committee (WALDMC) of which he is treasurer; and he denies any involvement in other such committees. (Minor variations on the name of WALDMC have appeared on various documents and campaign materials.) Any decision to proceed further against him must therefore be based on coherent allegations and supporting evidence concerning that committee. The complaint and supplemented record present neither.

Mr. Asplund requests the commission to consider the following points.

1. Committees composed of delegates enjoy the same financial independence as do individual delegates pursuant to 11 CFR 110.14 (d)(2). Committees are subject to separate reporting requirements (which WALDMC has met; a termination statement and financial report will be filed as soon as this action is authorized.) The different interpretation stated in the complaint is unfounded.

2. WALDMC is not affiliated with any other committee. The record contains no allegations sufficient to establish affiliation within the meaning of 11 CFR 100.5(g)(2)(ii).

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This and the previous point are both addressed in much greater detail in the response of the Mondale for President Committee, Inc. (MPC), of April 30, 1984, which Mr. Asplund finds pursuasive and adopts by reference with regard to its legal analysis on these points.

Neither Mr. Asplund nor anyone on his behalf took any part in the preparation of that response or had any knowledge of it before it was filed with the commission.

The allegation of use by WALDMC of campaign materials prepared by MPC (complaint, p. 6) supports no conclusion adverse to WALDMC or Mr. Asplund. The reuse of such materials as an independent expenditure is expressly authorized by 11 CFR 110.14 (d)(2)(ii)(A)(2). Nothing in the record justifies a conclusion that the materials in question were not within the protection of that section. (In addition, the particular items at issue were prepared without actual authorization even from WALDMC.)

3. It is elementary common knowledge that many if not most participants in the major party delegate selection process seek election expressly and primarily to support a particular candidate, rather than as independent decision makers. The complaint is totally in error in concluding that an emphasis on the qualifications of the presidential candidate in the materials of WALDMC or any other such committee undercuts its independent status. Nothing in law or the realities of the political system supports the position of the complaint. A "minimum delegate information content" requirement is not established by law and would serve no constructive purpose.

Regarding WALDMC in particular, its members are extremely well-known to the constituency; they include the governor and lieutenant governor of Wisconsin. Attaching their resumes to committee material was unnecessary. The name of the committee and the names of its members were prominently displayed on the letterhead used.

4. The commission should first investigate and consider carefully the extent to which this matter has been rendered moot by the voluntary decisions of the Mondale for President Committee, Inc., concerning treatment of independent committee funds. (Mr. Asplund has elected to follow a request from Vice-President Mondale on April 26, 1984 to terminate the activities of WALDMC.)

8504050310

Mr. Asplund therefore believes that no further proceeding against him is justified, and requests the commission to so determine.

Very truly yours,

SMOLER, ALBERT & ROSTAD, S.C.

Kenneth J. Doran

Kenneth J. Doran

KJD:wmr

cc: Richard Asplund

8504050031 1

SMOLER, ALBERT & ROSTAD
ATTORNEYS AT LAW
1 [illegible] MONONA AVENUE SUITE 520
MADISON, WISCONSIN 53703

HAND DELIVERED
84 MAY 25 AM : 14

Attorney Charles M. Steele
Federal Elections Commission
1325 K Street NW
Washington, DC 20463

RECEIVED AT THE FEC
GCC #3164
84 MAY 15 P1:28

SMOLER, ALBERT & ROSTAD

ATTORNEYS AT LAW

119 MONONA AVENUE - SUITE 500

MADISON, WISCONSIN 53703

WILLIAM W. SMOLER
JOHN C. ALBERT
THOMAS J. ROSTAD
C. WILLIAM FOUST
KENNETH J. DORAN

TELEPHONE
608/255-6000

May 14, 1984

Mr. Charles N. Steele
General Counsel
Federal Election Commission
1325 Kay Street, NW
Washington, D.C. 20463

RE: MUR 1667

84 MAY 15 P2:56

8504050313

Dear Mr. Steele:

I have been retained to represent Richard Asplund in connection with this matter. A statement of designation of counsel is enclosed.

Mr. Asplund believes that he can demonstrate that no action should be taken against him in response to the complaint in this matter. It is my understanding that a 15-day extension of time is routinely granted by the office of general counsel, and Mr. Asplund requests the benefit of your standard procedures in this regard.

In the event that an extension on that basis is denied, Mr. Asplund requests and extension of time in which to respond for cause, specifically inability to retain counsel in time to prepare an effective response for submission by May 15, 1984. Within the past few days, an attorney whom Mr. Asplund had expected to retain has withdrawn due to a possible conflict of interest, and a second attorney proved not to be in a position to prepare the response by the original due date. Mr. Asplund retained me on May 14, 1984. Mr. Asplund hereby offers to prove these matters by affidavit should the commission so require. Mr. Asplund requests an extension of 15 days, and if that is denied, for such lesser time as the commission may grant.

Mr. Asplund alleges that the additional materials submitted to him with your letter of May 4, 1984, in fact constitute an amendment to the complaint, rather than merely additional factual materials, and that he is entitled to the

response time thereby provided. We respectfully request you to withdraw the contrary position taken in the stated letter, so as to eliminate any uncertainty on this point.

Thank you very much for your consideration. I would request to be notified by telephone all decisions reached in response to the request contained in this letter.

Very truly yours,

SMOLER, ALBERT & ROSTAD, S.C.

Kenneth J. Doran

Kenneth J. Doran

KJD:wmr

cc: Richard Asplund

8504050031 4

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1667

NAME OF COUNSEL: Kenneth J. Doran

ADDRESS: 119 Monona Ave. Suite 520
Madison, WI 53703

TELEPHONE: (608) 255-8000

MAY 15 P2:59

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

Richard Asplund
Signature

RESPONDENT'S NAME: Richard Asplund

ADDRESS: 126 Sunny Mead Lane, 6
Madison, WI 53713

HOME PHONE: (608) 257-5833

BUSINESS PHONE: (608) 257-5833

8504050315

SMOLER, ALBERT & ROSTAD
ATTORNEYS AT LAW
119 MONONA AVENUE SUITE 520
MADISON, WISCONSIN 53703

RECEIVED BY THE FEC

84 MAY 15 P 1:23

84 MAY 15 P2:56

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

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1667

NAME OF COUNSEL: Kenneth J. Doran

ADDRESS: 119 Monona Ave. Suite 520
Madison, WI 53703

TELEPHONE: (608) 255-8000

'85 APR 15 P2:59

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.

M 14 1984
Date

Richard Asplund
Signature

RESPONDENT'S NAME: Richard Asplund

ADDRESS: 126 Sunny Mead Lane, 6
Madison, WI 53713

HOME PHONE: (608) 257-5833

BUSINESS PHONE: (608) 257-5833

8504050031 7

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Meade Emory, Treasurer
At-Large Delegates For
Mondale
P.O. Box 21742
Seattle, WA 98111

Re: MUR 1667

Dear Mr. Emory:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

8504050318

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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

8504050031 2

RECEIVED AT THE FEC
GCC#5983
84 DEC 17 A8:

LAW OFFICES

WILLIAMS & CONNOLLY

HILL BUILDING

839 SEVENTEENTH STREET, N.W.

WASHINGTON, D.C. 20006

AREA CODE 202
331-5000

EDWARD BENNETT WILLIAMS
PAUL R. CONNOLLY (1922-1978)
ROBERT A. SCHULMAN
VINCENT J. FULLER
RAYMOND W. BERGAN
STUART E. SENDEL
JEREMIAH C. COLLINS
ROBERT L. WEINBERG
DAVID POVICH
STEVEN M. UMIN
JOHN W. VARDAMAN, JR.
PAUL MARTIN WOLFF
J. ALAN GALBRAITH
CHARLES H. WILSON
JOHN G. KESTER
WILLIAM E. McDANIELS
BRENDAN V. SULLIVAN, JR.
AUBREY M. DANIEL, III

RICHARD M. COOPER
ROBERT P. WATKINS
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TERRENCE O'DONNELL
DOUGLAS R. MARVIN
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BARRY S. SIMON
KEVIN T. BAINE
STEPHEN L. URBANCZYK
PHILIP J. WARD
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FREDERICK WHITTEN PETERS

JAMES T. FULLER, III
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STANLEY I. LANGBEIN
LON S. BABBY
SCOTT BLAKE HARRIS
MICHAEL S. BUNDERMEYER
DAVID D. AUFHAUSER
BRUCE R. GENDERSON
CAROLYN H. WILLIAMS
F. LANE HEARD, III
STEVEN R. RUNEY
GERSON A. ZWEIFACH
SARAH H. DUGGIN
ROBERT S. LITT
SCOTT H. MATHESON, JR.
PAUL HOGIN
DANIELA WINKLER
JEFFREY B. KINDLER

HOWARD W. GUTMAN
G. DAVID FENSTERMACHER
NANCY F. PREISS
STUART L. GASNER
RICHARD B. HOFFMAN
STEVEN A. STEINBACH
TREVOR W. SWETT, III
ROBERT H. SAUNDERS
P. MICHELE ELLISON
LINDA C. RAY
MARY G. CLARK
MICHAEL P. MADOW *
LYNN A. STOUT
MARK S. LEVINSTEIN
JEFFERY D. UBERSAX
DIANNE S. McGANN
GEORGE ELLARD **
DANIEL F. KATZ ***

COUNSEL
RAOUL UNGAR
LYMAN G. FRIEDMAN
DONALD E. SCHWARTZ

* MEMBER NY BAR ONLY
** MEMBER PA BAR ONLY
*** MEMBER MD BAR ONLY

December 4, 1984

Charles N. Steele
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20005

Re: MUR 1704 and MUR 1667

Dear Mr. Steele:

Thank you for your letter of November 30, 1984, advising that the Commission voted to take no further action with respect to the Arlington Mondale Delegate Committee and Ann M. Yarborough, Treasurer. The legal and factual position of the Committee and Mrs. Yarborough is already on file, and we regard the Commission's action as set forth in your letter as a full vindication of this position.

Sincerely yours,

Robert L Weinberg

Robert L. Weinberg

Counsel for Ann M. Yarborough,
Treasurer, Arlington Mondale
Delegate Committee

8504050320

LAW OFFICES
LIAMS & CONNOLLY
HILL BUILDING
HINGTON, D. C. 20006

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WASHINGTON, D.C.
1 PM
DEC

SUPPORT DRUNK AND
DRUGGED DRIVING
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Charles N. Steele
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20005
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MARK S. LEVINSTEIN
DIANNE S. McGANN

COUNSEL
HAROLD UNGAR
LYMAN G. FRIEDMAN
DONALD E. SCHMITZ

* MEMBER NY BAR ONLY

July 15, 1984

Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20005

Attention: Charles N. Steele
General Counsel

Re: MUR 1704 and MUR 1667

Dear Commissioners:

This letter is in response to a letter of May 29, 1984, in MUR 1704, sent on behalf of General Counsel Charles N. Steele by Kenneth A. Gross, Associate General Counsel to Ann M. Yarborough, Treasurer, Arlington Mondale Delegate Committee.

The General Counsel's letter of May 29 represents the second letter sent by his office within several weeks to Mrs. Yarborough advising her that "the Federal Election Commission received a complaint which alleges that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ('the Act')." The same recital appeared in the General Counsel's letter to Mrs. Yarborough of May 11, 1984, in MUR 1667. In neither case, however, did the complaint in question either name Mrs. Yarborough or her Committee as a respondent or mention Mrs. Yarborough or her Committee in the body of the complaint.

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Indeed, it could not be clearer that the General Counsel's letter of May 29, 1984, is in error in asserting that the complaint in MUR 1704 contains allegations as to Mrs. Yarborough and the Arlington Mondale Delegate Committee. The complaint in its caption names some 15 respondents, none of whom is Mrs. Yarborough or her committee. The body of the complaint is concerned with various allegations of contributions by political action committees to certain specified Mondale delegate committees. None of the delegate committees named in the body of the complaint is even in the State of Virginia, let alone in Arlington County, Virginia. And as the Commission's own records of contributions must show, no PAC contributions were received by the Arlington Mondale Delegate Committee, and of course none are listed in the reports filed by Mrs. Yarborough as Treasurer of the Committee.

Accordingly, the complaint in MUR 1704 has nothing to do with Mrs. Yarborough or her committee, it confers no jurisdiction on the Commission to proceed with respect to them, and it should be dismissed out of hand insofar as it might be construed by the General Counsel to make any allegation with respect to Mrs. Yarborough or the Arlington Mondale Delegate Committee. The General Counsel's letter of May 29 should be formally withdrawn by the Commission because it is totally without basis.

The legal authorities which preclude the Commission from proceeding with respect to Mrs. Yarborough or her committee where neither has been designated as a respondent have already been furnished to the Commission in Mrs. Yarborough's response in MUR 1667. A copy of this response is attached hereto, and the applicable legal authorities there cited are respectfully incorporated herein by reference.

In order to reduce the burden on Mrs. Yarborough of responding to irrelevant allegations in these two matters, MUR 1704 and MUR 1667, it is respectfully requested that MUR 1667 be consolidated with MUR 1704. Such consolidation would presumably also benefit numerous other Committee treasurers who, like Mrs. Yarborough, may have received similar letters from the General Counsel reciting allegations that do not in fact pertain to them.

8504030327

Respectfully submitted,

Robert L. Weinberg

Robert L. Weinberg

Counsel for Ann M. Yarborough,
Treasurer, Arlington Mondale
Delegate Committee

p.s. I expect to be away from the office through July 9, 1984. If by any chance you should have occasion to request any other submission on behalf of Mrs. Yarborough during the period through July 9, please treat this as a request to extend the time for any such submission to July 16, 1984.

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DIANNE S. McGAAN

COUNSEL
HAROLD URGAN
LYMAN G. FRIEDMAN
DONALD E. SCHWARTZ

* MEMBER NY BAR ONLY

May 29, 1984

Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20005

Attention: Charles N. Steele
General Counsel

Re: MUR 1667

Dear Commissioners:

This letter is in response to Mr. Steele's letter of May 11, 1984, to Ann M. Yarborough, Treasurer, Arlington Mondale Delegate Committee, in the above-captioned matter. (That letter was supplemented by a further letter of May 25, 1984, from Mr. Steele.)Mrs. Yarborough's position is as follows:

1. The complaint filed by Americans With Hart, Inc. in the above-captioned matter confers no jurisdiction upon the Commission to proceed with respect to Mrs. Yarborough or the Arlington Mondale Delegate Committee.

The only respondent named in the Complaint in this matter is Mondale for President Committee, Inc. Nowhere in the caption or the body of the Complaint and its various supplements is there any mention of Mrs. Yarborough or the Arlington Mondale Delegate Committee, let alone any allegations as to their actions. Mr. Steele's letter to Mrs. Yarborough is simply incorrect in stating the Complaint and supplements "allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended". Accordingly, the letter should be withdrawn and the Commission should determine that there is no proceeding pending against Mrs. Yarborough and the Arlington Mondale Delegate Committee in this matter.

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2. The Complaint does not designate Mrs. Yarborough as a "respondent" as required by the Commission's regulations, 11 C.F.R. § 111.4(d)(1), and therefore must be dismissed as to her.

The Commission's regulations require that a complaint "should clearly identify as a respondent each person or entity who is alleged to have committed a violation". 11 C.F.R. § 111.4(d)(1). There is no such clear identification -- or indeed any identification -- of Mrs. Yarborough or the Arlington Mondale Delegate Committee in the Complaint herein. Accordingly, the Complaint must be dismissed as to them.

Compliance with this provision of the Commission's rules is essential to a fair proceeding. It is impossible for Mrs. Yarborough or her Committee to tell what they are charged with by this Complaint. There are scatter-shot allegations referring to Mondale Delegate Committees in certain other States, but no allegations directed toward activities of Mrs. Yarborough or the Arlington Mondale Delegate Committee.

3. Due process requires fair notice of specific charges; no response should be required unless and until such charges are made.

As noted above, the Complaint never mentions Mrs. Yarborough or the Arlington Mondale Delegate Committee. If the complainant wishes them to respond to its charges, it should be required to specify what the charges are. Due process requires such notice. Mrs. Yarborough cannot fairly be required to guess which if any of the allegations in the Complaint are intended to apply to her or her Committee.* This is especially so because the activities of the Arlington Mondale Delegate Committee bear little resemblance to the alleged actions ascribed to others in the Complaint.

---

* First Amendment considerations also require that the Complainant make specific allegations that are sufficient to show alleged conduct by the Arlington Committee and its Treasurer that is within the Commission's jurisdiction. See FEC v. Machinists Non-partisan Political League, 655 F.2d 380 (D.C. Cir. 1981), cert denied, 454 U.S. 897 (1981).

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Thus, for example, this Committee and its Treasurer received no PAC contributions. The contributions were modest in amount and in total, and came in substantial part directly from individuals who filed for election as delegates from Arlington County to the District and State Democratic Conventions. (No delegates to the Democratic National Convention were elected at the County level in Virginia.) The Committee's activities were in effect a joint fund-raising effort by candidates for election as Mondale delegates, for the purpose of contacting potential supporters of Mondale and informing them of and urging them to attend the Democratic mass meeting where delegates from Arlington County would be elected. (No funds were expended for media advertising.) This was a local, grass roots effort, similar to those which have historically occurred among Arlington County Democrats supporting various candidates of their choice in Presidential election years. The Committee received and welcomed advice on compliance with federal election law requirements from the Mondale for President organization, but the political decisions of the Arlington Committee were made independently, as were the decisions on expenditures of the Committee's funds. The Arlington Mondale Delegate Committee was not an "affiliated committee" of any other organization within the meaning of 11 C.F.R. §100.5(g).

The foregoing can be demonstrated through an evidentiary showing, should that become necessary to rebut any charges made. But in the present state of the record, there are no charges pending with respect to Mrs. Yarborough or her Committee. Accordingly, the Commission should take no action against the Arlington Mondale Delegate Committee or its Treasurer, nor find any reason to believe that there has been a violation of the Federal Election Campaign Act by either of them.

Respectfully submitted,

Robert L. Weinberg

Robert L. Weinberg

Counsel for Ann M. Yarborough,
Treasurer, Arlington Mondale
Delegate Committee

Thus, for example, this Committee and its Treasurer received no PAC contributions. The contributions were modest in amount and in total, and came in substantial part directly from individuals who filed for election as delegates from Arlington County to the District and State Democratic Conventions. (No delegates to the Democratic National Convention were elected at the County level in Virginia.) The Committee's activities were in effect a joint fund-raising effort by candidates for election as Mondale delegates, for the purpose of contacting potential supporters of Mondale and informing them of and urging them to attend the Democratic mass meeting where delegates from Arlington County would be elected. (No funds were expended for media advertising.) This was a local, grass roots effort, similar to those which have historically occurred among Arlington County Democrats supporting various candidates of their choice in Presidential election years. The Committee received and welcomed advice on compliance with federal election law requirements from the Mondale for President organization, but the political decisions of the Arlington Committee were made independently, as were the decisions on expenditures of the Committee's funds. The Arlington Mondale Delegate Committee was not an "affiliated committee" of any other organization within the meaning of 11 C.F.R. §100.5(g).

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Respectfully submitted,

Robert L. Weinberg

Robert L. Weinberg

Counsel for Ann M. Yarborough,
Treasurer, Arlington Mondale
Delegate Committee

8504050327

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1704

NAME OF COUNSEL: Robert L. Weinberg

ADDRESS: 1139 17th St. N.W.
Washington, D.C 20006

TELEPHONE: (202) 331-5043

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.

6/6/84
Date

Ann M. Yarborough
Signature

RESPONDENT'S NAME: Ann M. Yarborough

ADDRESS: 5140 N. 30th St.
Arlington, VA 22207

HOME PHONE: 703-538-2713

BUSINESS PHONE: None

8504050032 8

LAW OFFICES
AMS & CONNOLLY
HILL BUILDING
INGTON, D.C. 20006

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

Attention: Charles N. Steele
General Counsel

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WASHINGTON, D. C. 20006
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July 15, 1984

Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20005

Attention: Charles N. Steele
General Counsel

Re: MUR 1704 and MUR 1667

Dear Commissioners:

This letter is in response to a letter of May 29, 1984, in MUR 1704, sent on behalf of General Counsel Charles N. Steele by Kenneth A. Gross, Associate General Counsel to Ann M. Yarborough, Treasurer, Arlington Mondale Delegate Committee.

The General Counsel's letter of May 29 represents the second letter sent by his office within several weeks to Mrs. Yarborough advising her that "the Federal Election Commission received a complaint which alleges that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ('the Act')." The same recital appeared in the General Counsel's letter to Mrs. Yarborough of May 11, 1984, in MUR 1667. In neither case, however, did the complaint in question either name Mrs. Yarborough or her Committee as a respondent or mention Mrs. Yarborough or her Committee in the body of the complaint.

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Indeed, it could not be clearer that the General Counsel's letter of May 29, 1984, is in error in asserting that the complaint in MUR 1704 contains allegations as to Mrs. Yarborough and the Arlington Mondale Delegate Committee. The complaint in its caption names some 15 respondents, none of whom is Mrs. Yarborough or her committee. The body of the complaint is concerned with various allegations of contributions by political action committees to certain specified Mondale delegate committees. None of the delegate committees named in the body of the complaint is even in the State of Virginia, let alone in Arlington County, Virginia. And as the Commission's own records of contributions must show, no PAC contributions were received by the Arlington Mondale Delegate Committee, and of course none are listed in the reports filed by Mrs. Yarborough as Treasurer of the Committee.

Accordingly, the complaint in MUR 1704 has nothing to do with Mrs. Yarborough or her committee, it confers no jurisdiction on the Commission to proceed with respect to them, and it should be dismissed out of hand insofar as it might be construed by the General Counsel to make any allegation with respect to Mrs. Yarborough or the Arlington Mondale Delegate Committee. The General Counsel's letter of May 29 should be formally withdrawn by the Commission because it is totally without basis.

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In order to reduce the burden on Mrs. Yarborough of responding to irrelevant allegations in these two matters, MUR 1704 and MUR 1667, it is respectfully requested that MUR 1667 be consolidated with MUR 1704. Such consolidation would presumably also benefit numerous other Committee treasurers who, like Mrs. Yarborough, may have received similar letters from the General Counsel reciting allegations that do not in fact pertain to them.

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Respectfully submitted,

Robert L. Weinberg

Counsel for Ann M. Yarborough,
Treasurer, Arlington Mondale
Delegate Committee

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May 29, 1984

Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20005

Attention: Charles N. Steele
General Counsel

Re: MUR 1667

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DIANNE S. HUBAAK

COUNSEL
HAROLD UNGAR
LYMAN G. FRIEDMAN
DONALD E. SCHWARTZ

* MEMBER DC BAR ONLY

May 29, 1984

8504050034

Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20005

Attention: Charles N. Steele
General Counsel

Re: MUR 1667

Dear Commissioners:

This letter is in response to Mr. Steele's letter of May 11, 1984, to Ann M. Yarborough, Treasurer, Arlington Mondale Delegate Committee, in the above-captioned matter. (That letter was supplemented by a further letter of May 25, 1984, from Mr. Steele.)Mrs. Yarborough's position is as follows:

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Thus, for example, this Committee and its Treasurer received no PAC contributions. The contributions were modest in amount and in total, and came in substantial part directly from individuals who filed for election as delegates from Arlington County to the District and State Democratic Conventions. (No delegates to the Democratic National Convention were elected at the County level in Virginia.) The Committee's activities were in effect a joint fund-raising effort by candidates for election as Mondale delegates, for the purpose of contacting potential supporters of Mondale and informing them of and urging them to attend the Democratic mass meeting where delegates from Arlington County would be elected. (No funds were expended for media advertising.) This was a local, grass roots effort, similar to those which have historically occurred among Arlington County Democrats supporting various candidates of their choice in Presidential election years. The Committee received and welcomed advice on compliance with federal election law requirements from the Mondale for President organization, but the political decisions of the Arlington Committee were made independently, as were the decisions on expenditures of the Committee's funds. The Arlington Mondale Delegate Committee was not an "affiliated committee" of any other organization within the meaning of 11 C.F.R. §100.5(g).

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Respectfully submitted,

Robert L. Weinberg

Robert L. Weinberg

Counsel for Ann M. Yarborough,
Treasurer, Arlington Mondale
Delegate Committee

8504050033

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1704

NAME OF COUNSEL: Robert L. Weinberg

ADDRESS: 839 17th St. N.W.
Washington, D.C 20006

TELEPHONE: (202) 331-5043

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.

6/6/84
Date

Ann M. Yarborough
Signature

RESPONDENT'S NAME: Ann M. Yarborough

ADDRESS: 5140 N. 37th St.
Arlington, VA 22207

HOME PHONE: 703-538-2713

BUSINESS PHONE: None

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OCC# 3317

LAW OFFICES

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BRENDAN V. SULLIVAN, JR.
AUBREY M. DANIEL, III

RICHARD M. COOPER
ROBERT P. WATKINS
JERRY L. SHULMAN
LAWRENCE LUCCHINO
LEWIS H. FERGUSON, III
ROBERT B. BARNETT
DAVID E. KENDALL
JOHN J. BUCKLEY, JR.
BERNARD J. CARL
TERRENCE O'DONNELL
DOUGLAS R. MARVIN
JOHN K. VILLA
BARRY S. SIMON
KEVIN T. BAINE
STEPHEN L. URBANCZYK
PHILIP J. WARD
ELLEN BEBAL HUVELLE
FREDERICK WHITTEN PETERS

KENNETH M. HOFFMAN
JAMES T. PULLMAN, III
PETER J. KAHN
JUDITH A. MILLER
STANLEY I. LANGBEIN
LON S. BABBY
SCOTT BLAKE HARRIS
MICHAEL S. SUNDERMEYER
DAVID D. AUFHAUSER
BRUCE R. GENDERSON
CAROLYN H. WILLIAMS
F. LANE HEARD, III
STEVEN R. KUNEY
FAIRLEA A. SHEEHY
GERSON A. ZWEIFACH
SARAH H. DUGGIN
SCOTT H. MATHESON, JR.

PAUL HOGIN
DANIELA WINKLER
HOWARD W. GUTMAN
G. DAVID FENSTERHEIM
NANCY F. PREISS
STUART L. GASNER
RICHARD S. HOFFMAN
STEVEN A. STEINBACH
TREVOR W. SWETT, III
ROBERT H. SAUNDERS
P. MICHELE ELLISON
LINDA C. RAY
MARY G. CLARK
MICHAEL P. HADDOW *
LYNN A. STOUT
MARK S. LEVINSTEIN
DIANNE S. McGANN

COUNSEL
HAROLD UNGAR
LYMAN G. FRIEDMAN
DONALD E. SCHWARTZ

* MEMBER NY BAR ONLY

MUR 1667
Memo

May 29, 1984

Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20005

Attention: Charles N. Steele
General Counsel

Re: MUR 1667

Dear Commissioners:

This letter is in response to Mr. Steele's letter of May 11, 1984, to Ann M. Yarborough, Treasurer, Arlington Mondale Delegate Committee, in the above-captioned matter. (That letter was supplemented by a further letter of May 25, 1984, from Mr. Steele.)Mrs. Yarborough's position is as follows:

1. The complaint filed by Americans With Hart, Inc. in the above-captioned matter confers no jurisdiction upon the Commission to proceed with respect to Mrs. Yarborough or the Arlington Mondale Delegate Committee.

The only respondent named in the Complaint in this matter is Mondale for President Committee, Inc. Nowhere in the caption or the body of the Complaint and its various supplements is there any mention of Mrs. Yarborough or the Arlington Mondale Delegate Committee, let alone any allegations as to their actions. Mr. Steele's letter to Mrs. Yarborough is simply incorrect in stating the Complaint and supplements "allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended". Accordingly, the letter should be withdrawn and the Commission should determine that there is no proceeding pending against Mrs. Yarborough and the Arlington Mondale Delegate Committee in this matter.

2. The Complaint does not designate Mrs. Yarborough as a "respondent" as required by the Commission's regulations, 11 C.F.R. § 111.4(d)(1), and therefore must be dismissed as to her.

The Commission's regulations require that a complaint "should clearly identify as a respondent each person or entity who is alleged to have committed a violation". 11 C.F.R. § 111.4(d)(1). There is no such clear identification -- or indeed any identification -- of Mrs. Yarborough or the Arlington Mondale Delegate Committee in the Complaint herein. Accordingly, the Complaint must be dismissed as to them.

Compliance with this provision of the Commission's rules is essential to a fair proceeding. It is impossible for Mrs. Yarborough or her Committee to tell what they are charged with by this Complaint. There are scatter-shot allegations referring to Mondale Delegate Committees in certain other States, but no allegations directed toward activities of Mrs. Yarborough or the Arlington Mondale Delegate Committee.

3. Due process requires fair notice of specific charges; no response should be required unless and until such charges are made.

As noted above, the Complaint never mentions Mrs. Yarborough or the Arlington Mondale Delegate Committee. If the complainant wishes them to respond to its charges, it should be required to specify what the charges are. Due process requires such notice. Mrs. Yarborough cannot fairly be required to guess which if any of the allegations in the Complaint are intended to apply to her or her Committee.* This is especially so because the activities of the Arlington Mondale Delegate Committee bear little resemblance to the alleged actions ascribed to others in the Complaint.

---

* First Amendment considerations also require that the Complainant make specific allegations that are sufficient to show alleged conduct by the Arlington Committee and its Treasurer that is within the Commission's jurisdiction. See FEC v. Machinists Non-partisan Political League, 655 F.2d 380 (D.C. Cir. 1981), cert denied, 454 U.S. 897 (1981).

Thus, for example, this Committee and its Treasurer received no PAC contributions. The contributions were modest in amount and in total, and came in substantial part directly from individuals who filed for election as delegates from Arlington County to the District and State Democratic Conventions. (No delegates to the Democratic National Convention were elected at the County level in Virginia.) The Committee's activities were in effect a joint fund-raising effort by candidates for election as Mondale delegates, for the purpose of contacting potential supporters of Mondale and informing them of and urging them to attend the Democratic mass meeting where delegates from Arlington County would be elected. (No funds were expended for media advertising.) This was a local, grass roots effort, similar to those which have historically occurred among Arlington County Democrats supporting various candidates of their choice in Presidential election years. The Committee received and welcomed advice on compliance with federal election law requirements from the Mondale for President organization, but the political decisions of the Arlington Committee were made independently, as were the decisions on expenditures of the Committee's funds. The Arlington Mondale Delegate Committee was not an "affiliated committee" of any other organization within the meaning of 11 C.F.R. §100.5(g).

The foregoing can be demonstrated through an evidentiary showing, should that become necessary to rebut any charges made. But in the present state of the record, there are no charges pending with respect to Mrs. Yarborough or her Committee. Accordingly, the Commission should take no action against the Arlington Mondale Delegate Committee or its Treasurer, nor find any reason to believe that there has been a violation of the Federal Election Campaign Act by either of them.

Respectfully submitted,

Robert L. Weinberg

Robert L. Weinberg

Counsel for Ann M. Yarborough,
Treasurer, Arlington Mondale
Delegate Committee

LAW OFFICES
AMS & CONNOLLY
ILL BUILDING
NGTON, D. C. 20006

Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20005

Attention: Charles N. Steele
General Counsel

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STATEMENT OF DESIGNATION OF COUNSEL

MUR 1667

NAME OF COUNSEL: Robert L. Weinberg

ADDRESS: 939 17th St., N.W.
Washington, D.C. 20006

TELEPHONE: (202) 331-5043

Mur 1667
Memo

84 MAY 31 A12:56

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.

5/29/84
Date

Ann M. Yarborough
Signature

RESPONDENT'S NAME: Ann M. Yarborough

ADDRESS: 5140 N. 37th Street
Arlington, VA 22207

HOME PHONE: 703-538-2713

BUSINESS PHONE: None

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. Yarborough
. 37th St.
rton, VA 22207

NORTHERN VIRGINIA, VA 220
PM
30 MAY
1984

84 MAY 31 AM

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

ntion: General Counsel

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ann M. Yarborough, Treasurer
Arlington Mondale Delegate
Committee
5140 North 37th Street
Arlington, VA 22207

Re: MUR 1667

Dear Ms. Yarborough:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

8504050343

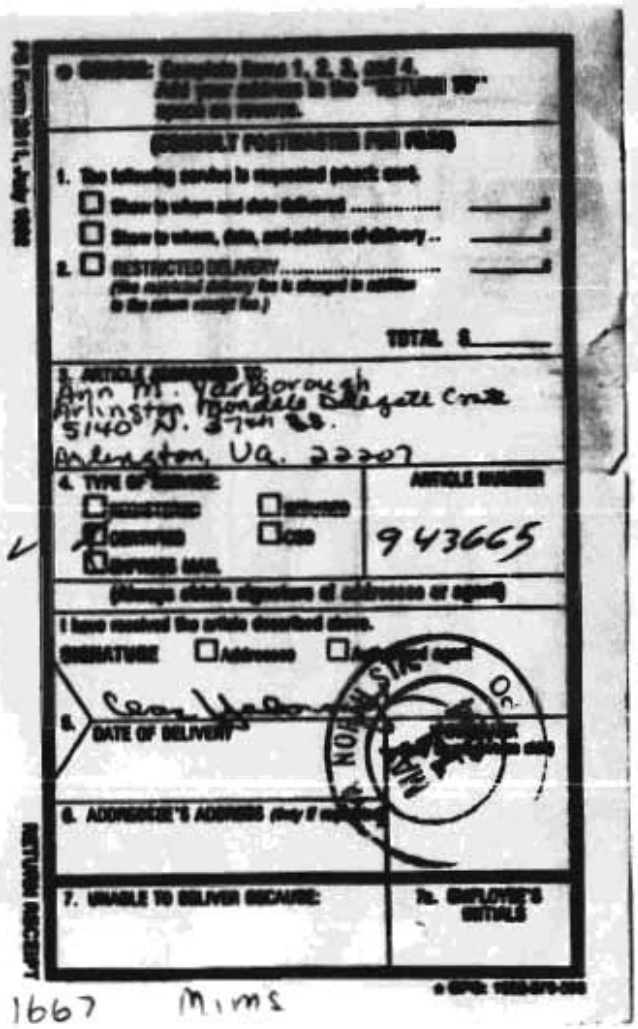
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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



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1200 Mutual Building
909 East Main Street
Richmond, Virginia 23219
June 12, 1984

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FEDERAL EXPRESS

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

Re: Paddi Valentine, Treasurer, Mondale 3rd District Delegate Selection Committee -- MUR 1704

Dear Mr. Steele:

This letter is written in behalf of Mrs. Paddi Valentine, Treasurer of the Mondale 3rd District Delegate Selection Committee in response to your letter of May 29, 1984, with the attached complaint filed by the National Right to Work Committee and Ralph Martin ("Bud") Hettinga, Jr., on May 18, 1984. No action should be taken against Mrs. Valentine, as Treasurer of the Mondale 3rd District Delegate Selection Committee, since, as you will see from reading the following letter, all actions taken by that committee and Mrs. Valentine were fully in compliance with the Federal Election Compaign Act of 1971 and the regulations promulgated thereunder and the Mondale 3rd District Delegate Selection Committee was not affiliated with any other committee for purposes of the limitation ceilings under the Act.

The complainants, in their lengthy materials, appear to allege that the Mondale For President campaign committee is "affiliated" with all other delegate committees formed by individual delegates who support Walter F. Mondale for President within the meaning of 2 U.S.C. § 441(a)(5) and 11 C.F.R. § 100.5g. Complainants further allege that because of this "affiliation", all such committees should be governed by a single ceiling limitation. As this complaint pertains to this Mondale 3rd District Delegate Selection Committee, it is utterly without basis since this Committee is not affiliated with the Mondale For President Committee, Inc. nor any other delegate committee.

The complainants make many allegations regarding certain specific delegate committees throughout the country. There is no specific allegation concerning the Mondale 3rd District Delegate Selection Committee. Indeed, as noted in our response to MUR 1667, the Mondale 3rd District Delegate Selection Committee was

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conceived by individuals at the local level who desired to become delegates and wished to support other individuals seeking to become delegates who were supporting Mr. Mondale. All decisions regarding whether to form a committee, how to form a committee, how to seek contributions, and how to make expenditures were made by these local individuals who were not influenced in any way by the Mondale For President Committee, Inc. When forming the Committee, Mrs. Valentine and the other individuals who formed the Committee did not believe they even had the implicit support of the Mondale For President Committee. Indeed, decisions on expenditures were made by the Mondale 3rd District Delegate Selection Committee that in some cases were contrary to the wishes of certain members of the Mondale For President Committee and they have been inconsistent with the general Mondale campaign in Virginia.

As noted on the reports filed by the Mondale 3rd District Delegate Selection Committee, all expenditures of the Committee were authorized by 11 C.F.R. § 110.14(d)(1) in that all expenditures went directly to further the candidacy only of delegates. These expenditures included cost of travel and subsistence during the delegate selection process, fees for parties held prior to the caucuses and immediately thereafter and communications sent to all delegate candidates registered in Virginia encouraging full participation and giving tips on getting elected as a delegate.

Under U.S.C. § 441a(a)(5), committees are deemed to be affiliated if they are "established or financed or maintained or controlled by . . ." the same person. As noted above, the Mondale 3rd District Delegate Selection Committee was conceived by local individuals and was not established, financed, maintained or controlled in any way by the Mondale For President Committee or by any other delegate selection committee. The facts alleged in the complaint are not inconsistent with this conclusion.

The complainants list in their complaint certain contributions made by various union affiliated PACs to various delegate selection committees throughout the country. This list is apparently intended to show that certain contributions may have been "coordinated". The list shows nothing of the kind. It is no secret that Mondale delegates received the philosophical support and, accordingly, the financial support from various unions throughout the country. To prohibit one delegate selection committee from accepting such funds merely because similar types of organizations may be making contributions to other delegate committees is absurd and would leave delegate committees in a hopeless position of not knowing whether to accept contributions from various sources. Since most states are in the process of

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delegate selection at the same time, delegate selection committees would most likely be formed and receive contributions at the same time. The Mondale 3rd District Delegate Selection Committee filed its first report on March 20, 1984 and filed a termination report on May 21, 1984. Contributions were received between March 9, 1984, through April, 1984, including one from the Coal PAC on March 22, 1984. The Committee was active during this period in anticipation of the delegate selection process in April. Contrary to the allegations of the complainants, the timing of these contributions simply does not show coordination between committees.

Moreover, the complainants do not show what other sources of contributions any particular organization received. In the case of the Mondale 3rd District Delegate Selection Committee, only one contributor was a union-related PAC and the others were several individuals. Finally, in a state such as Virginia where coal mining is a major source of revenue and a major concern for almost all residents, it is entirely understandable that the Coal Miners PAC would make a contribution to a delegate selection committee in the state. Indeed, acceptance of this money from the union PAC was in contravention to the specific wishes of the Mondale For President Committee, Inc. Acceptance of such a gift, therefore, cannot mean under any circumstances that the Mondale 3rd District Delegate Selection Committee was affiliated with the Mondale For President Committee, who had indicated its desire that his delegates not accept such money.

The Federal Election Commission has delineated various factors in 11 C.F.R. § 100.5g which may be indicia of affiliation. As noted above, absolutely none of these factors exist in either the planning, maintenance, or execution of the wishes of the Mondale 3rd District Delegate Selection Committee. Thus, there is absolutely no basis for the continuation of the complaint against the Mondale 3rd District Delegate Selection Committee and no action should be taken against it or against its treasurer, Mrs. Valentine.

Please feel free to contact me should you have any further questions.

Very truly yours,

Rosemary G. Kenyon, Counsel to
Mrs. Paddi Valentine, Treasurer,
Mondale 3rd District Delegate
Selection Committee

RGK:mvh

cc: Mrs. Paddi Valentine

8504050034 7

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1704

NAME OF COUNSEL: Rosemary G. Kenyon

ADDRESS: 1200 Mutual Building
909 East Main Street
Richmond, Virginia 23219

TELEPHONE: (804) 644-7851

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.

June 6, 1984
Date

Paul Valentine
Signature

RESPONDENT'S NAME: Paul Valentine

ADDRESS: Stockton Lane
Richmond, Virginia
23221

HOME PHONE: 804-353-8493

BUSINESS PHONE: 804-741-4831

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STATEMENT OF DESIGNATION OF COUNSEL

GCC#3572

MUR 1667

NAME OF COUNSEL: Rosemary G. Kenyon

ADDRESS: 1200 Mutual Building
909 East Main Street
Richmond, Virginia 23219-3095

TELEPHONE: (804) 644-7851

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.

June 1, 1984
Date

Paddi Valentine
Signature

RESPONDENT'S NAME: Paddi Valentine, Treasurer

ADDRESS: Mondale 3rd District Delegate Selection Committee
19 Albemarle Avenue
Richmond, Virginia 23226

HOME PHONE: 804 - 353-8493

BUSINESS PHONE: 804 741-4831

8504050034?

Valentine
Roemaule Avenue
Richmond, Va 23224





Federal Elections Committee
1325 K Street N.W.
Washington, D.C.
20463

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GCC#3374

1200 Mutual Building
909 East Main Street
Richmond, Virginia 23219
May 29, 1984

MUR 1667
Memo

FEDERAL EXPRESS

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

84 MAY 31 A12:24

Re: Paddi Valentine, Treasurer, Mondale 3rd District Delegate Selection Committee -- MUR 1667

8504050031

Dear Mr. Steele:

This letter is written on behalf of Mrs. Paddi Valentine, Treasurer of the Mondale 3rd District Delegate Selection Committee in response to your letter of May 11, 1984, with the attached Complaint filed by Americans with Hart, Inc., on April 6, 1984, with supplements dated April 18, April 27 and May 2, 1984.* No action should be taken against Mrs. Valentine, as Treasurer of the Mondale 3rd District Delegate Selection Committee, since, as you will see from reading the following letter, all actions taken by that Committee and by Mrs. Valentine were fully in compliance with the Federal Election Campaign Act of 1971 and the regulations promulgated thereunder.

The complainant, in its lengthy materials, appears to make two general allegations with respect to the delegate selection committees functioning throughout the country. No reference is

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*By letter dated May 18, 1984, a request for an extension of time to respond was requested since the Treasurer, her counsel, and other individuals necessary for an accurate and useful response were scheduled to be out of town during most of the 15-day response period. That request was denied. This letter is filed, nevertheless, on a timely basis but is limited due to the shortness of time and the numerous supplements to the Complaint, one of which was received on May 29, 1984.

made specifically to the Mondale 3rd District Delegation Selection Committee. First, the complainant alleges that such delegate selection committees should not be allowed to make use of the regulations authorizing delegates to make certain expenditures, specifically those under 11 C.F.R. 110.14(d). Second, the complainant contends that all expenditures made by delegate committees, such as the Mondale 3rd District Delegate Selection Committee, should be counted as expenditures made by the Mondale for President Committee, Inc. The complaintant's first contention is simply without merit based upon the applicable regulations and statutory scheme. With respect to the Mondale 3rd District Delegate Selection Committee, of which Mrs. Valentine is Treasurer, the complainant's second allegations simply are not supported by the facts.

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I. The Mondale 3rd District Delegate Selection Committee may avail itself of the expenditures allowed under 11 C.F.R. 110.14(d).

Under 11 C.F.R. 110.14(d)(1) and (2), a delegate committee may make expenditures for various costs related solely to the election of a delegate and also for materials relating to the election of both the delegate and a candidate for the office of President. When expenditures are made for materials relating both to the election of a delegate and the presidential candidate, the expenditures are subject to certain limitations set forth in 110.14(d)(2). Neither provision makes a distinction between expenditures made by individual delegates or by a delegate committee. If anything, both provisions emphasize that they are applicable to delegate committees by noting, in parentheses, the provisions requiring reporting by delegate committees. To contend that such provisions apply only to individual delegates and not delegate committees is to distort and manipulate the clear import of the language used by the Federal Election Commission and the purposes of the Act. Thus, it is clear that delegate committees may make expenditures on material both to further the candidacy of the individual delegates and the presidential candidate.

All expenditures of the Mondale 3rd District Delegate Selection Committee were authorized by 11 C.F.R. § 110.14(d)(1)

in that all, as noted on the reports* filed by the Committee, were spent directly to further the candidacy only of delegates. These expenditures included cost of travel and subsistence during the delegate selection process, fees for parties held prior to the caucuses and immediately thereafter and communications sent to all delegates registered in Virginia encouraging full participation and giving tips on getting elected.

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II. The Mondale 3rd District Delegate Selection Committee is not affiliated with the Mondale for President Committee, Inc. within the meaning of 2 U.S.C. § 441a(a)(5).

The complainant further alleges that all delegate selection committees, such as the Mondale 3rd District Delegate Selection Committee, are affiliated with the Mondale for President Committee, Inc., and all expenditures should, therefore, be lumped together. This allegation is based on the wrong legal standard and is not supported by the facts as they pertain to the Mondale 3rd District Delegate Selection Committee. Under the Act, 2 U.S.C. § 441a(a)(5), committees are deemed to be affiliated if they are "established or financed or maintained or controlled by . . . " the same person. The Mondale 3rd District Delegate Selection Committee was conceived at the local level and was not established, financed, maintained or controlled by the Mondale for President Committee, or any other delegate selection committee.

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*The complainant notes that apparently some reports due on April 15, 1984 were filed late. The Mondale 3rd District Delegate Selection Committee April 15 report was late since the Federal Election Commission did not provide the Committee with the report on a timely basis.

The Mondale 3rd District Delegate Selection Committee was conceived by individuals at the local level who desired to become delegates and wished to support other individuals seeking to become delegates who were supporting Mr. Mondale. All decisions for expenditures made by the Mondale 3rd District Delegate Selection Committee were made by individuals at the local level and were not influenced in any way by the Mondale for President Committee, Inc. In fact, decisions on expenditures were made by the Mondale 3rd District Delegate Selection Committee that in some cases were contrary to the wishes of certain members of the Mondale for President Committee, Inc. Thus, none of the factors outlined in 2 U.S.C. § 441a(a)(5) or by the Federal Election Commission regulations under 11 C.F.R. § 100.5g(2)(ii) exist.

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Summary

It is clear that there is no basis for any action to be taken against the Mondale 3rd District Delegate Selection Committee since all of its expenditures, contributions, and all other actions have been fully in compliance with the statutes and regulations in question and it has operated as a totally independent and nonaffiliated committee from the Mondale for President Committee, Inc. Accordingly, there is no basis for any further action and the Complaint, so far as it regards the Mondale 3rd District Delegate Selection Committee, should be dismissed.

Termination Report

On May 21, 1984, the Mondale 3rd District Delegate Selection Committee filed its Termination Report. Since that time, it has received word from your office that the Federal Election Commission will not accept the termination report and will require further reporting even though this Committee will not be making any further expenditures or receiving any further contributions. Under the Federal Election Campaign Act, and regulations promulgated by the Federal Election Commission thereunder, there is no authority for a continued reporting obligation once a termination report has been filed and there are no further obligations or contributions. In spite of this, however, and in an effort at conciliation, the Mondale 3rd District Delegate Selection Committee will continue to file reports at your request but will do so under protest.

Should you have any questions, please feel free to contact me.

Very truly yours,

Rosemary G. Kenyon

RGK:vnj

cc: Mrs. Paddi Valentine

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84 MAY 21 AM 8:

CHRISTIAN, BARTON, EPPS, BRENT & CHAPPELL
1200 MUTUAL BUILDING
RICHMOND, VIRGINIA 23219-3095

TEL 804-644-7851
CABLE ADDRESS "BARPAR"

Mur 1667
Mims

May 18, 1984

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

Re: Mondale 3rd District Delegate Selection Committee
(MUR 1667)

Dear Mr. Mims:

As we discussed by telephone on Thursday, May 17, 1984, we are representing Ms. Paddi Valentine, Treasurer, Mondale 3rd District Delegate Selection Committee in connection with a complaint filed on April 6, 1984, with the Federal Election Commission, and supplements. By letter of May 11, 1984, your office informed Ms. Valentine that a response to the complaint must be filed within fifteen days of receipt of that letter.

This letter is to request an extension of time during which to respond to the May 11, 1984 letter. The reason an extension of time is necessary is that both counsel and the important individuals from whom information must be obtained in order to respond fully and adequately to the May 11th letter will be out of town during much of the fifteen days following receipt of the letter. In order to prepare a full response so that you will have the facts relevant to your future determinations, we request an extension of time during which to respond until June 15, 1984.

I understand that our request will be submitted to the Commission immediately and that you will inform me of its determination.

Please feel free to contact me should you have any questions. I look forward to your response.

With best wishes, I remain

Very truly yours,

Rosemary C. Kenyon

RGK:vnj

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L. BARTON, EPPS, BRENT & CHAPPELL
ATTORNEYS AT LAW
1800 MUTUAL BUILDING
RICHMOND, VIRGINIA 23219-3095

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1984

84 MAY 21 AM 12

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

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Paddi Valentine, Treasurer
Mondale 3rd District Delegate
Section Committee
Stockton Lane
Richmond, VA 23221

Re: MUR 1667

Dear Ms. Valentine:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

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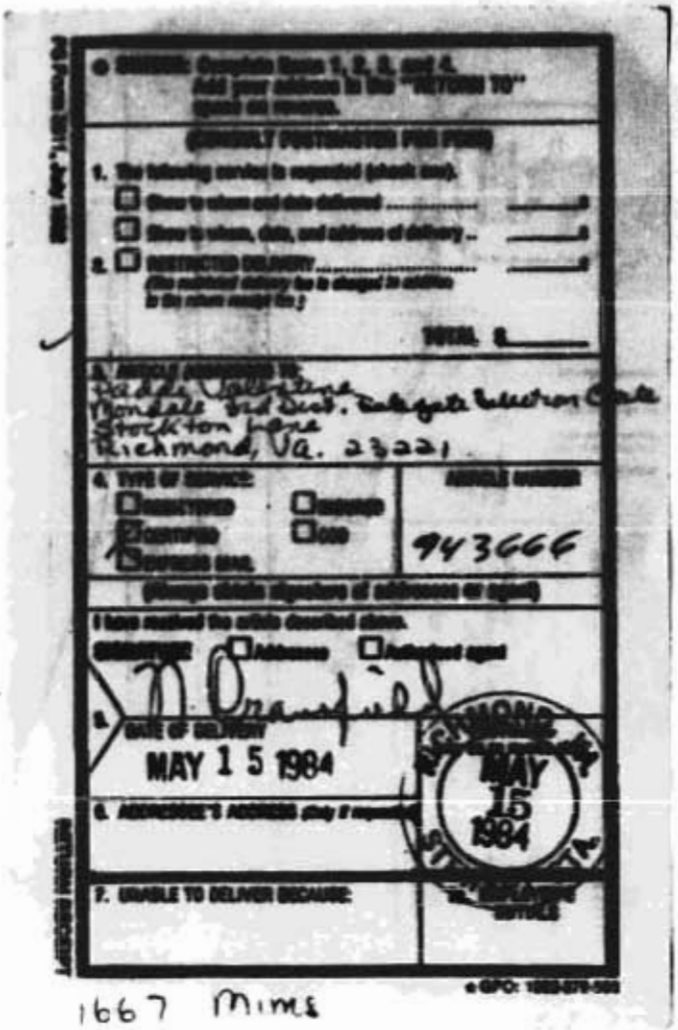
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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



1667 Mims

8504050035?

Gen'l 3960

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84 JUN 28 P12:26

LAW OFFICES OF

HOWELL, DAUGHERTY, BROWN & LAWRENCE

HENRY E. HOWELL, JR.
GUY DAUGHERTY
ROBERT E. BROWN
J. GRAY LAWRENCE, JR.

ROBERT H. BOREN
HENRY E. HOWELL, III

ONE EAST PLUME STREET
POST OFFICE BOX 3688
NORFOLK, VIRGINIA 23514
TELEPHONE (804) 623-7334

June 26, 1984

Federal Election Commission
Associate General Counsel
Washington D. C. 20463

Re: MUR 1704

Dear Mr. Gross:

I am writing on behalf of my good friend, Pauline Davis, who was a volunteer worker for Mondale in Norfolk, Virginia. I served as his second district campaigner.

I can recall Mrs. Davis calling me and stating that she was advised that she was being sent a donation of $5,000.00. She wanted to know how she should handle it. I told her that I was not familiar with the federal laws, but if she opened an account and kept a record of all disbursements, it was my opinion that she would not be subject to critisism.

Although I have been practicing law for 40 years, I am not acquainted with the federal election laws.

Today, Mrs. Davis has come to my office with your letter of June 19. I must leave the city for the balance of the week. Upon my return, if not before, it is my intention to find out who will be representating Mrs. Davis for the purpose of answering this complaint.

For the foregoing reasons, I am requesting an extension of time until August 1, 1984, for Mrs. Davis to answer any complaints that may be required by law.

3504003560

With kind regards, I am

Sincerely,

HOWELL, DAUGHERTY, BROWN & LAWRENCE

By: Henry E. Howell pep
Henry E. Howell, Jr.

HEH,Jr./ pep

cc: Lyn Olithant, Esquire
George Murphy

8504050036 1

LAW OFFICES OF
HOWELL, DAUGHERTY, BROWN & LAWRENCE
ONE EAST PLUME STREET
P.O. BOX 3688
NORFOLK, VIRGINIA 23514





Federal Election Commission
Washington, D. C.
20463

ATTENTION: Kenneth A. Gross
Associate General Counsel

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 19, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Pauline Davis, Treasurer
Mondale 2nd C.D. Delegate
Recruitment Committee
1007 Kempsville Road
Virginia Beach, Virginia 23464

Re: MUR 1704

Dear Ms. Davis:

This letter is to notify you that on May 18, 1984 the Federal Election Commission received a complaint which alleges that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1704. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

8504005033

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. 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

8504050036 4

8 6 0 4 0 5 0 0 3 6

Ironworkers Local No. 3
Political Action Committee
2201 Liberty Avenue
Pittsburgh, PA 15222

BUILD UNIO
BUY AMERICA
MAILER'S ADV.

PITTSBURGH, PA 152 PM 2 APR 1984

PITTSBURGH APR 2 PA

Pa. at Large Delegates for Mondale
% Joanne Ciulla, Treasurer
717 Pine Street
Philadelphia, PA. 19106

EXHIBIT "D"

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1704

NAME OF COUNSEL: Harold Hammett

ADDRESS: P.O. Box 17047
Fort Worth, Texas 76102-7071

TELEPHONE: 817/335-6133

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.

June 14, 1984
Date

Melinda T Vance
Signature

RESPONDENT'S NAME: Melinda T. Vance, Treasurer
Tarrant County Delegate Committee

ADDRESS: 3901 Mockingbird Lane
Fort Worth, Texas 76109

HOME PHONE: 817/921-0046

BUSINESS PHONE:

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June 14, 1984

Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20005

FEDERAL EXPRESS MAIL 70761

Re: MUR 1704, Complaint of The National Right to Work Committee and Ralph Martin (Bud) Hettinga, Jr v. Walter F. Mondale and Mondale for President Campaign Committee

Dear Commissioners:

Tarrant County Delegate Committee responds to the May 29th, 1984, letter of Kenneth A. Gross, Associate General Counsel, and to its enclosures as follows:

1. The Complaint should be dismissed as to Tarrant County Delegate Committee because the Complaint makes no allegations as to such Committee, and does not even mention it by name. As to this Committee, the Complaint therefore appears to be in clear violation of 11C.F.R. Section 111.14(d).

2. Subject to the foregoing, Tarrant County Delegate Committee was created under 11C.F.R. Section 110.14(b)(2) and (e) and has properly filed its pre-election (primary) report of contributions received and expenditures made. There is no prohibition in such actions against the expenditures made by such Committee, which were devoted solely to a telephone bank.

3. In any event, the Complaint makes no allegations as to any improper conduct by this Delegate Committee, or any other delegate committee functioning in Texas.

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Accordingly, Tarrant County Delegate Committee urges that the Commission take no action as to it, or as to any other delegate committee in Texas.

Respectfully submitted this June 14th, 1984.

Tarrant County Delegate Committee

By Melinda T Vance
Melinda Vance, Treasurer

3504050036

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1704

NAME OF COUNSEL: Harold Hammett

ADDRESS: P.O. Box 17047
Fort Worth, Texas 76102-7071

TELEPHONE: 817/335-6133

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.

June 14, 1984
Date

Melinda T Vance
Signature

RESPONDENT'S NAME: Melinda T. Vance, Treasurer
Tarrant County Delegate Committee

ADDRESS: 3901 Mockingbird Lane
Fort Worth, Texas 76109

HOME PHONE: 817/921-0046

BUSINESS PHONE:

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GC#3479

MUR 1667 Memo

May 25, 1984

Federal Election Commission
1325 K Street, N. W.
Washington, D. C. 20005

CERTIFIED MAIL
RETURN RECEIPT REQUESTED No. P653863151

Re: MUR 1667, Complaint of Americans With Hart, Inc., v. Mondale for President Committee, Inc.

Dear Commissioners:

Tarrant County Delegate Committee responds to the May 11th, 1984 letter of Lawrence M. Noble (received May 14th, 1984) and to its enclosures as follows:

1. The Complaint should be dismissed as to Tarrant County Delegate Committee because the Complaint makes no allegations as to any improper conduct by such Committee, and does not even mention it by name. As to this Committee, the Complaint therefore appears to be in clear violation of 11 C.F.R. Section 111.14(d).

2. Subject to the foregoing, Tarrant County Delegate Committee was created under 11 C.F.R. Section 110.14(b)(2) and (e) and has properly filed its pre-election (primary) report of contributions received and expenditures made. There is no prohibition in such sections against the expenditures made by such Committee, which were devoted solely to a telephone bank.

3. The Complaint makes no allegations as to any improper conduct by any other delegate committee organized in Texas.

Accordingly, Tarrant County Delegate Committee urges that the Commission take no action as to it, or as to any other delegate

8504050370

committee in Texas.

Respectfully submitted this May 25th, 1984.

Tarrant County Delegate Committee

by: Melinda Vance

Melinda Vance, Treasurer
3901 Mockingbird Lane
Fort Worth, Texas 76109

Harold D. Hammett

HAROLD D. HAMMETT
300 Professional Building
303 West Tenth Street
Fort Worth, Texas 76102

Estil Vance Jr.

ESTIL VANCE, JR.
2100 InterFirst Tower
Fort Worth, Texas 76102

ATTORNEYS FOR TARRANT COUNTY DELEGATE COMMITTEE

8504050371

May 25, 1984

Federal Election Commission
1325 K Street, N. W.
Washington, D. C. 20005

CERTIFIED MAIL
RETURN RECEIPT REQUESTED No. P653863151

Re: MUR 1667, Complaint of Americans With Hart, Inc., v. Mondale for President Committee, Inc.

Dear Commissioners:

Tarrant County Delegate Committee responds to the May 11th, 1984 letter of Lawrence M. Noble (received May 14th, 1984) and to its enclosures as follows:

1. The Complaint should be dismissed as to Tarrant County Delegate Committee because the Complaint makes no allegations as to any improper conduct by such Committee, and does not even mention it by name. As to this Committee, the Complaint therefore appears to be in clear violation of 11 C.F.R. Section 111.14(d).

2. Subject to the foregoing, Tarrant County Delegate Committee was created under 11 C.F.R. Section 110.14(b)(2) and (e) and has properly filed its pre-election (primary) report of contributions received and expenditures made. There is no prohibition in such sections against the expenditures made by such Committee, which were devoted solely to a telephone bank.

3. The Complaint makes no allegations as to any improper conduct by any other delegate committee organized in Texas.

Accordingly, Tarrant County Delegate Committee urges that the Commission take no action as to it, or as to any other delegate

8504005037 2

committee in Texas.

Respectfully submitted this May 25th, 1984.

Tarrant County Delegate Committee

by: Melinda Vance

Melinda Vance, Treasurer
3901 Mockingbird Lane
Fort Worth, Texas 76109

Harold D. Hammett

HAROLD D. HAMMETT
300 Professional Building
303 West Tenth Street
Fort Worth, Texas 76102

Estil Vance Jr.

ESTIL VANCE, JR.
2100 InterFirst Tower
Fort Worth, Texas 76102

ATTORNEYS FOR TARRANT COUNTY DELEGATE COMMITTEE

8504050037 3

D. HAMMETT

ANISMAN, DOBY,
LSON & LILES

OFESSIONAL CORPORATION
NEYS AND COUNSELORS
P. O. BOX 17047
PROFESSIONAL BUILDING
303 WEST TENTH
ORTH, TEXAS 76102-7071

RETURN RECEIPT REQUESTED

CERTIFIED

P 653 863 151

MAIL

Federal Election Commission
1325 K Street, N. W.
Washington, D. C. ~~20005~~ 20463

RETURN RECEIPT REQUESTED

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Melinda T. Vance, Treasurer
Tarrant County Delegate Committee
3901 Mockingbird Lane
Fort Worth, TX 76109

Re: MUR 1667

Dear Ms. Vance:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

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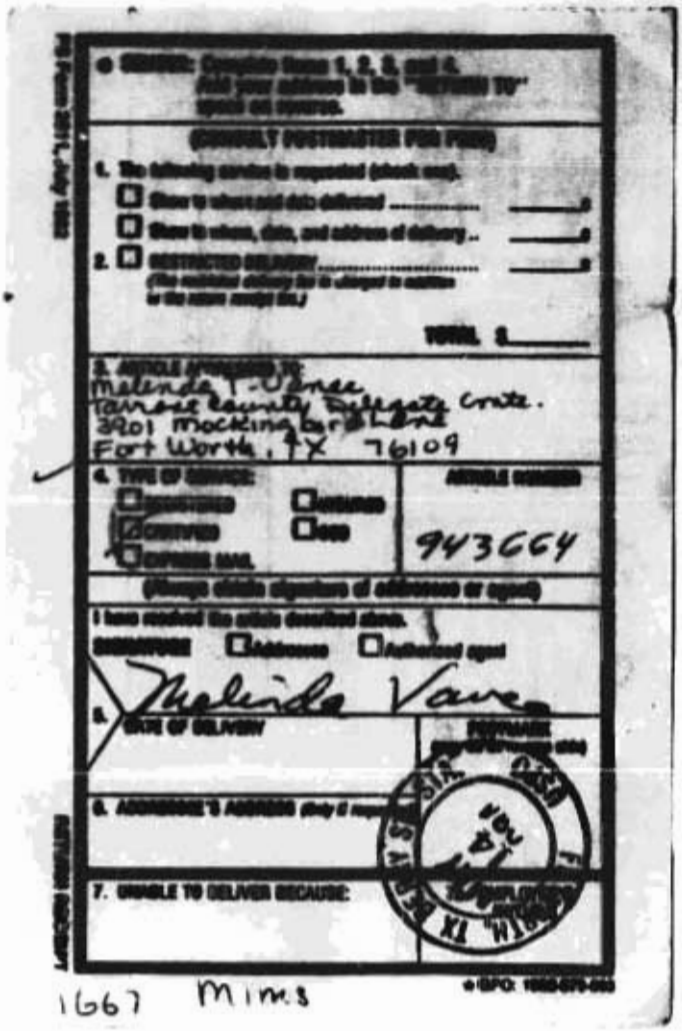
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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



85040500375

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Frank Herrera, Treasurer
26th District Mondale Delegate
Committee
111 West Laurel, Suite 101
San Antonio, TX 78212

Re: MUR 1667

Dear Mr. Herrera:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

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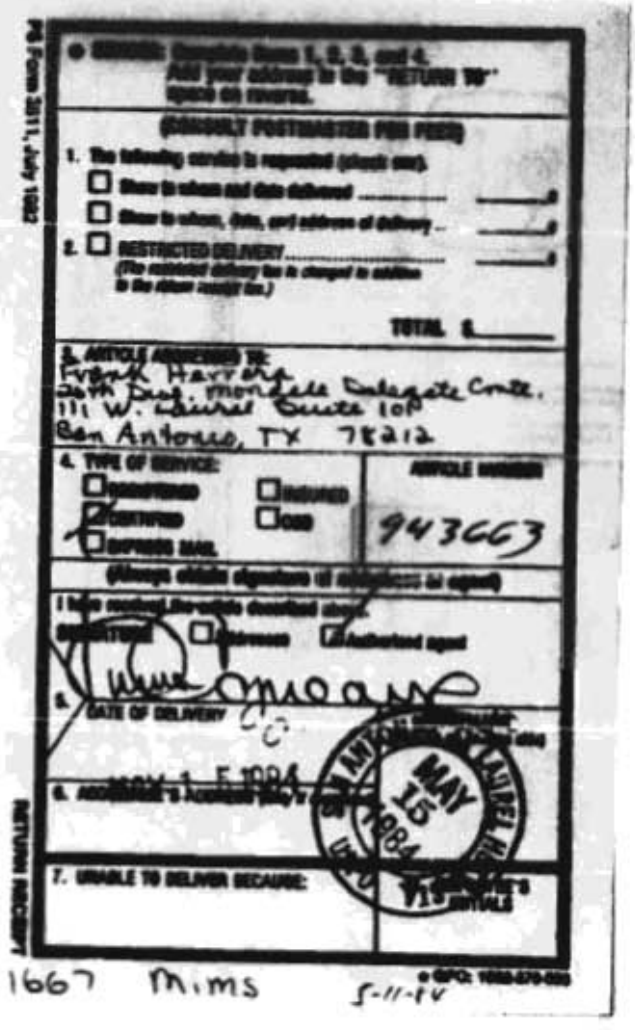
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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



8504050038

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Millie Bruner, Treasurer
23rd District Mondale
Delegate Committee
2107 McKinney
Dallas, TX 75201

Re: MUR 1667

Dear Ms. Bruner:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

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If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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

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Mr. Charles N. Steele June 16, 1984
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

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Re: MUR 1704

Dear Mr. Steele:

This letter and supporting exhibits constitute my individual response as Treasurer of the 14th District Mondale Committee to the complaint filed by the National Right to Work Committee. I received the complaint from you on June 4, 1984. In addition to the remarks found herein, I incorporate by reference, in its entirety the response filed by the Mondale for President Committee, Inc.(MPC) on April 30, 1984.

The 14th District Mondale Delegate Committee is composed of a number of persons who hoped to become delegates to the Texas Democratic Convention. A number of these persons were, in fact, elected as delegates and alternates to the state convention. The purpose of the 14th District Committee was to see that these people got to the convention as Mondale delegates. Under 11 C.F.R. Section 110.14(b) (2) we find the definition of a "delegate committee". This definition fits the 14th District Mondale Delegate Committee.

The delegate committee came into existence in early April, 1984, approximately one month before the May 5 precinct conventions. The committee raised and spent only about $485.00. As treasurer, I have determined, to the best of my ability, that those contributing to the delegate committee had not reached their $1,000 maximum for contributions to a candidate. However, it is my position that these contributors are not subject to that limitation because the delegate committee is independent of MPC. It may also be important to note that all contributions received by the delegate committee were from individuals. We received no money from political action committees.

I am attaching as Exhibit A copies of my reports to the F.E.C. showing the contributions and expenditures of the committee. In this state, delegate candidates' names are not listed on the ballot. Election occurs at the precinct convention. Most of the funds expended by the delegate committee were spent on a letter to persons who had attended such conventions in the past. Other than that, the money was spent on office supplies. I am not even certain that this committee is required to file a report since we raised and spent less than $1,000. I am not a lawyer and I am unfamiliar with federal election laws. However, I am certain that there was no intent to evade any requirements of the law on my part.

If the Commission would like further information, please feel free to contact me.

Yours truly,

Roger Duncan
Treasurer
14th District Mondale Delegate Committee
1407A Bridgeway
Austin, Texas 78704

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

(Summary Page)

ALIGN AREA | ALIGN AREA

1. Name of Committee (In Full)

14th District Mondale Delegate Committee

Address (Number and Street)

1407A Bridgeway

City, State and ZIP Code

Austin, Tx. 78704

☐ Check here if address is different than previously reported.

2. FEC Identification Number

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

4. TYPE OF REPORT (Check appropriate boxes)

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

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

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SUMMARY	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period 4/1/84 through 4/30/84		
6. (a) Cash on hand January 1, 19 84		$ 0
(b) Cash on Hand at Beginning of Reporting Period	$ 0	
(c) Total Receipts (from Line 18)	$ 485.00	$
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ 485.00	$ 485.00
7. Total Disbursements (from Line 28)	$ 328.71	$
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 156.29	$
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)	$ 0	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	$ 0	

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

Roger Duncan
Type or Print Name of Treasurer

Roger Duncan
SIGNATURE OF TREASURER

6/4/84
Date

For further information contact
Federal Election Commission
Toll Free 800 424 9530
Local 202 523 4068

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

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

FEC FORM 3X (3 80)

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

Name of Committee (in Full)	Report Covering the Period	
14th District Mondale Delegate Committee	From: 4/1/84	To: 4/30/84

	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date	
I. RECEIPTS			
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees	485.00	485.00	11(a)
(Memo Entry Unitemized $)			
(b) Political Party Committees			11(b)
(c) Other Political Committees			11(c)
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c))	485.00	485.00	11(d)
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES			12
13. ALL LOANS RECEIVED	--	--	13
14. LOAN REPAYMENTS RECEIVED			14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)			15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			16
17. OTHER RECEIPTS (Dividends, Interest, etc.)			17
18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)	485.00	485.00	18
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES	328.71	328.71	19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES	--	--	20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			21
22. INDEPENDENT EXPENDITURES (use Schedule E)	328.71	328.71	22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. §441 a(d)) (Use Schedule F)			23
24. LOAN REPAYMENTS MADE			24
25. LOANS MADE			25
26. REFUNDS OF CONTRIBUTIONS TO			
(a) Individuals/Persons Other Than Political Committees			26(a)
(b) Political Party Committees			26(b)
(c) Other Political Committees			26(c)
(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))			26(d)
27. OTHER DISBURSEMENTS			27
28. TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	328.71	328.71	28
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)	485.00	485.00	29
30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)			30
31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)	485.00	485.00	31
32. TOTAL OPERATING EXPENDITURES from Line 19	328.71	328.71	32
33. OFFSETS TO OPERATING EXPENDITURES from Line 15			33
34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)	328.71	328.71	34

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SCHEDULE A

ITEMIZED RECEIPTS

Page ___ of ___ for Line Number ___
(Use separate schedule(s) for each category of the Detailed Summary Page)

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

Name of Committee (in Full)
14th District Mondale Delegate Committee

A. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation / Aggregate Year-to-Date	Date (month, day, year)	Amount of Each Receipt this Period
David Brown 4614 Bandy Hill Dr. Austin, Tx. 78723 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	AT&T Occupation: Comm. Techn Aggregate Year-to-Date-$ [illegible]	4/4/84 4/5/84	$50 $20
B. Full Name, Mailing Address and ZIP Code Gayle Bruton 12522 Mistletoe Manchaca, Tx. 78652 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer: Southwestern Bell Occupation: Svc. Rep. Aggregate Year-to-Date-$ 25.00	Date (month, day, year): 4/4/84	Amount of Each Receipt This Period: $25
C. Full Name, Mailing Address and ZIP Code Florence Clepton 1204 Leander Dr. Leander, Tx. 78641 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer: AT&T Occupation: Maintence Adm. Aggregate Year-to-Date-$ 25.00	Date (month, day, year): 4/4/84	Amount of Each Receipt This Period: $25
D. Full Name, Mailing Address and ZIP Code Mr. & Mrs. W.L. Craven 11004 Ranch Rd. 2222 Austin, Tx. 78732 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer: none Occupation: retired Aggregate Year-to-Date-$ 100.00	Date (month, day, year): 4/5/84	Amount of Each Receipt This Period: $100.00
E. Full Name, Mailing Address and ZIP Code Catherine Darby Rt. 1 Box 157G Manor, Tx. 78853 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer: C.W.A. Occupation: Clerk Aggregate Year-to-Date-$25.00	Date (month, day, year): 4/5/84	Amount of Each Receipt This Period: $25.
F. Full Name, Mailing Address and ZIP Code Denise Donnelly P.O. Box 14045 Austin, Tx. 78761 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer: AT&T Occupation: Svce. Ordr. Writer Aggregate Year-to-Date-$50.00	Date (month, day, year): 4/5/84	Amount of Each Receipt This Period: $50.00
G. Full Name, Mailing Address and ZIP Code Mrs. Thomas R. Armstrong 17917 Lafayette Dr. Leander, Tx. 78641 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer: AT&T Occupation: Mkt. rep. Aggregate Year-to-Date-$70.00	Date (month, day, year): 4/5/84	Amount of Each Receipt This Period: $70.00
SUBTOTAL of Receipts This Page (optional)			
TOTAL This Period (last page this line number only)			

85040500381

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)
14th District Mondale Delegate Committee

A. Full Name, Mailing Address and ZIP Code Lorra Pike 3402A Southoak Austin, Tx. 78704 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer AT&T Occupation Svce. rep. Aggregate Year-to-Date-$ 25.00	Date (month, day, year) 4/4/84	Amount of Each Receipt this Period $25.00
B. Full Name, Mailing Address and ZIP Code Howard Pyle 4508 Tejas Trail Austin, Texas 78745 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Southwestern Bell Occupation Systems Tech. Aggregate Year-to-Date-$ 25.00	Date (month, day, year) 4/4/84	Amount of Each Receipt This Period $25.00
C. Full Name, Mailing Address and ZIP Code Evalena Smith 5900 Garden Oaks Dr. Austin, Texas 78745 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer AT&T Occupation Comm-Svc. Observer Aggregate Year-to-Date-$ 25.00	Date (month, day, year) 4/5/84	Amount of Each Receipt This Period $25.00
D. Full Name, Mailing Address and ZIP Code A.L. Spence 5701 Oakclaire Dr. Austin, Tx. 78735 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Southwestern Bell Occupation Tech. Aggregate Year-to-Date-$ 25.00	Date (month, day, year) 4/4/84	Amount of Each Receipt This Period $25.00
E. Full Name, Mailing Address and ZIP Code Roger Duncan 1407A Bridgeway Austin, Texas 78704 Receipt For ☐ Primary ☐ General ☐ Other (specify):	Name of Employer City Of Austin Occupation City Councilmember Aggregate Year-to-Date-$	Date (month, day, year) 4/5/84	Amount of Each Receipt This Period $20.00
F. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date-$	Date (month, day, year)	Amount of Each Receipt This Period
G. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date-$	Date (month, day, year)	Amount of Each Receipt This Period
SUBTOTAL of Receipts This Page (optional)			
TOTAL This Period (last page this line number only)			$485.00

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SCHEDULE D
(Revised 3/80)

DEBTS AND OBLIGATIONS
Excluding Loans

Page 1 of 1 for
LINE NUMBER ____
(Use separate schedules for each numbered line)

Name of Committee (In Full) 14th District Mondale Delegate Committee	Outstanding Balance Beginning of This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor None				
Nature of Debt (Purpose):				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose)				
1) SUBTOTALS This Period This Page (optional)				
2) TOTAL This Period (last page this line only)				
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)				0
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)				0

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SCHEDULE B **ITEMIZED DISBURSEMENTS**

Page ___ of ___ for
LINE NUMBER _____
(Use separate schedule(s) for each category of the Detailed Summary Page)

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

Name of Committee (in Full)

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			

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SCHEDULE C
(Revised 3/80)

LOANS

Page 1 of 1 for
LINE NUMBER ____
(Use separate schedules for each numbered line)

Name of Committee (in Full)
14th District Mondale Delegate Committee

A. Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Cumulative Payment To Date	Balance Outstanding at Close of This Period
None Election: ☐ Primary ☐ General ☐ Other (specify):			
Terms: Date Incurred _____ Date Due _____ Interest Rate _____ %(apr) ☐ Secured			
List All Endorsers or Guarantors (if any) to Item A			
1. Full Name, Mailing Address and ZIP Code Name of Employer Occupation Amount Guaranteed Outstanding $			
2. Full Name, Mailing Address and ZIP Code Name of Employer Occupation Amount Guaranteed Outstanding $			
3. Full Name, Mailing Address and ZIP Code Name of Employer Occupation Amount Guaranteed Outstanding $			

B. Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Cumulative Payment To Date	Balance Outstanding at Close of This Period
Election: ☐ Primary ☐ General ☐ Other (specify):			
Terms: Date Incurred _____ Date Due _____ Interest Rate _____ %(apr) ☐ Secured			
List All Endorsers or Guarantors (if any) to Item B			
1. Full Name, Mailing Address and ZIP Code Name of Employer Occupation Amount Guaranteed Outstanding $			
2. Full Name, Mailing Address and ZIP Code Name of Employer Occupation Amount Guaranteed Outstanding $			
3. Full Name, Mailing Address and ZIP Code Name of Employer Occupation Amount Guaranteed Outstanding $			

SUBTOTALS This Period This Page (optional)	0
TOTALS This Period (last page in this line only)	0

Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.

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SCHEDULE E

ITEMIZED INDEPENDENT EXPENDITURES

(See Reverse Side for Instructions)

Page 1 of 1 Pages

Name of Committee (in Full): 14th District Mondale Delegate Committee

I.D. No

Full Name, Mailing Address & ZIP Code of Each Payee	Purpose of Expenditure	Date (month, day, year)	Amount	Name of Federal Candidate supported or opposed by the expenditure & office sought
Worley Printing 731 W. 23rd Austin, Tx. 78705	Letters and envelopes to past delegates	4/19/84	$203.05	Walter Mondale ☒ Support ☐ Oppose
Travis Co. Assessor-Collector Travis Co. Ct.house Annex Austin, Tx. 78701	Street index	4/12/84	$14.	same as above ☐ Support ☐ Oppose
Common Cause 1200 Guadalupe # 201 Austin, Tx. 78701	Tickets	4/16/84	$20	same ☐ Support ☐ Oppose
Abel Stationers 500 Congress Austin, Tx. 78701	office supplies	4/17/84	$29.96	same ☐ Support ☐ Oppose
Worth Beal Rental 3007 Longhorn Blvd. Austin, Tx. 78759	table rental	4/19/84	$29.93	same ☐ Support ☐ Oppose
Misc. supplies, stamps			$31.77	same ☐ Support ☐ Oppose

(a) SUBTOTAL of Itemized Independent Expenditures	$ 296.94	
(b) SUBTOTAL of Unitemized Independent Expenditures	$ 31.77	
(c) TOTAL Independent Expenditures	328.71	$

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, concert with, or at the request or suggestion of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures did not involve the financing of dissemination, distribution, or republication, in whole or in part, of any campaign materials prepared by the candidate, his campaign committee, or their agent.

Signature _____ Date _____

Subscribed and sworn to before me this _____ day of _____, 19____

My Commission expires _____

NOTARY PUBLIC

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SCHEDULE F

ITEMIZED COORDINATED EXPENDITURES MADE BY POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S) ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE (2 U.S.C. §441a(d))

Page ___ of ___ for LINE NUMBER ___

(To be used only by Political Committees in the General Election)

Name of Political Committee (in Full)

Has your Committee been designated to make coordinated expenditures by a political party committee? ☐YES ☐NO
If YES, name the designating committee:

Full Name, Mailing Address and ZIP Code of Subordinate Committee

Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
	Aggregate General Election Expenditure for this Candidate—$			
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
	Aggregate General Election Expenditure for this Candidate—$			
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
	Aggregate General Election Expenditure for this Candidate—$			
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
	Aggregate General Election Expenditure for this Candidate—$			
SUBTOTAL of Expenditures This Page (optional)				
TOTAL This Period (last page this line number only)				

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

(Summary Page)

RECEIVED AT THE FEC

HAND DELIVERED

ALIGN AREA

1. Name of Committee (In Full)

14th District Mondale Delegate Committee

Address (Number and Street)

1407A Bridgeway

City, State and ZIP Code

Austin, Tx. 78704

☐ Check here if address is different than previously reported

2. FEC Identification Number

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

4. TYPE OF REPORT (Check appropriate boxes)

(a) ☐ April 15 Quarterly Report ☐ October 15 Quarterly Report
☐ July 15 Quarterly Report ☐ January 31 Year End Report
☐ July 31 Mid Year Report (Non Election Year Only)
☒ Monthly Report for May, 1984
☐ Twelfth day report preceding _____ (Type of Election)
election on _____ in the State of _____
☐ Thirtieth day report following the General Election
on _____ in the State of _____
☐ Termination Report

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

SUMMARY	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period May 1 through May 31, 84		
6. (a) Cash on hand January 1, 19 84		$ 0
(b) Cash on Hand at Beginning of Reporting Period	$ 156.29	
(c) Total Receipts (from Line 18)	$ 0	$
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ 156.29	$ 156.29
7. Total Disbursements (from Line 28)	$ 0	$
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 156.29	$
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)	$ 0	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	$ 0	

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

Roger Duncan
Type or Print Name of Treasurer

Roger Duncan
SIGNATURE OF TREASURER

Date 6/5/84

For further information contact
Federal Election Commission
Toll Free 800 424 9530
Local 202 523 4068

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

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

FEC FORM 3X (3 80)

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

Name of Committee (in Full): 14th District Mandale Delegate Comm Hoc

Report covering the Period: From 9/20/84 To 5/31/84

	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date	
I. RECEIPTS			
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees	0	$485.00	11(a)
(Memo Entry Unitemized $_____)			
(b) Political Party Committees	0	—	11(b)
(c) Other Political Committees	0	—	11(c)
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c))	0	$485.00	11(d)
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES	—		12
13. ALL LOANS RECEIVED	—		13
14. LOAN REPAYMENTS RECEIVED	—		14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	—		15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	—		16
17. OTHER RECEIPTS (Dividends, Interest, etc.)	—		17
18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)	0	$485.00	18
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES	0		19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES			20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			21
22. INDEPENDENT EXPENDITURES (use Schedule E)			22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. § 441 a(d)) (Use Schedule F)			23
24. LOAN REPAYMENTS MADE			24
25. LOANS MADE			25
26. REFUNDS OF CONTRIBUTIONS TO			
(a) Individuals/Persons Other Than Political Committees			26(a)
(b) Political Party Committees			26(b)
(c) Other Political Committees			26(c)
(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))			26(d)
27. OTHER DISBURSEMENTS	0		27
28. TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	0		28
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)	0		29
30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)			30
31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)			31
32. TOTAL OPERATING EXPENDITURES from Line 19			32
33. OFFSETS TO OPERATING EXPENDITURES from Line 15			33
34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)	0		34

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SCHEDULE A **ITEMIZED RECEIPTS**

Page 1 of 1 for
LINE NUMBER _____
(Use separate schedule(s) for each category of the Detailed Summary Page)

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

Name of Committee (in Full)

A. Full Name, Mailing Address and ZIP Code - 0 - Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date–$	Date (month, day, year)	Amount of Each Receipt this Period
B. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date–$	Date (month, day, year)	Amount of Each Receipt This Period
C. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date–$	Date (month, day, year)	Amount of Each Receipt This Period
D. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date–$	Date (month, day, year)	Amount of Each Receipt This Period
E. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date–$	Date (month, day, year)	Amount of Each Receipt This Period
F. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date–$	Date (month, day, year)	Amount of Each Receipt This Period
G. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date–$	Date (month, day, year)	Amount of Each Receipt This Period
SUBTOTAL of Receipts This Page (optional)			
TOTAL This Period (last page this line number only)			0

SCHEDULE B **ITEMIZED DISBURSEMENTS**

LINE NUMBER _____
(Use separate schedule(s) for each category of the Detailed Summary Page)

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

Name of Committee (In Full)

A. Full Name, Mailing Address and ZIP Code — 0 —	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			

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SCHEDULE C
(Revised 3/80)

LOANS

Page 1 of 1 for
LINE NUMBER ___
(Use separate schedules for each numbered line)

Name of Committee (in Full)
14th District Mondale Delegate Committee

A. Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Cumulative Payment To Date	Balance Outstanding at Close of This Period
NONE Election: ☐ Primary ☐ General ☐ Other (specify)			
Terms: Date Incurred _____ Date Due _____ Interest Rate _____ %(apr) ☐ Secured			
List All Endorsers or Guarantors (if any) to Item A			
1. Full Name, Mailing Address and ZIP Code Name of Employer Occupation Amount Guaranteed Outstanding $			
2. Full Name, Mailing Address and ZIP Code Name of Employer Occupation Amount Guaranteed Outstanding $			
3. Full Name, Mailing Address and ZIP Code Name of Employer Occupation Amount Guaranteed Outstanding $			

B. Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Cumulative Payment To Date	Balance Outstanding at Close of This Period
Election: ☐ Primary ☐ General ☐ Other (specify)			
Terms: Date Incurred _____ Date Due _____ Interest Rate _____ %(apr) ☐ Secured			
List All Endorsers or Guarantors (if any) to Item B			
1. Full Name, Mailing Address and ZIP Code Name of Employer Occupation Amount Guaranteed Outstanding $			
2. Full Name, Mailing Address and ZIP Code Name of Employer Occupation Amount Guaranteed Outstanding $			
3. Full Name, Mailing Address and ZIP Code Name of Employer Occupation Amount Guaranteed Outstanding $			
SUBTOTALS This Period This Page (optional)			
TOTALS This Period (last page in this line only)			

Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.

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SCHEDULE D
(Revised 3/80)

DEBTS AND OBLIGATIONS
Excluding Loans

FEC ____ of ____ for
LINE NUMBER: ____
(Use separate schedules for each numbered line)

Name of Committee (in Full) 14th District Mandale Delegate Comm.	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor NONE				
Nature of Debt (Purpose):				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
1) SUBTOTALS This Period This Page (optional)				
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)				

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SCHEDULE E

ITEMIZED INDEPENDENT EXPENDITURES

(See Reverse Side for Instructions)

Page ____ of ____ Pages

Name of Committee (in Full)	I D No

Full Name, Mailing Address & ZIP Code of Each Payee	Purpose of Expenditure	Date (month, day, year)	Amount	Name of Federal Candidate supported or opposed by the expenditure & office sought
-0-				☐ Support ☐ Oppose
				☐ Support ☐ Oppose
				☐ Support ☐ Oppose
				☐ Support ☐ Oppose
				☐ Support ☐ Oppose
				☐ Support ☐ Oppose

(a) **SUBTOTAL** of Itemized Independent Expenditures $ _____

(b) **SUBTOTAL** of Unitemized Independent Expenditures $ _____

(c) **TOTAL** Independent Expenditures $ _____

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, concert with, or at the request or suggestion of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures did not involve the financing of dissemination, distribution, or republication in whole or in part of any campaign materials prepared by the candidate, his campaign committee, or their agent.

_____ _____

Signature Date

Subscribed and sworn to before me this _____ day of

_____, 19____

My Commission expires

_____ _____

NOTARY PUBLIC

85040500397

SCHEDULE F

ITEMIZED COORDINATED EXPENDITURES BY POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S) ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE (2 U.S.C. §441a(d))

Page ___ of ___
LINE NUMBER ___

(To be used only by Political Committees in the General Election)

Name of Political Committee (in Full)

Has your Committee been designated to make coordinated expenditures by a political party committee? ☐YES ☐NO
If YES, name the designating committee:

Full Name, Mailing Address and ZIP Code of Subordinate Committee

— 0 —

Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
	Aggregate General Election Expenditure for this Candidate—$			
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
	Aggregate General Election Expenditure for this Candidate—$			
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
	Aggregate General Election Expenditure for this Candidate—$			
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
	Aggregate General Election Expenditure for this Candidate—$			
SUBTOTAL of Expenditures This Page (optional)				
TOTAL This Period (last page this line number only)				

85040500398

HAND DELIVERED
84 JUN 6 AM 9:23

Mr. Charles N. Steele June 4,1984
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 1667

Dear Mr. Steele:

This letter and supporting exhibits constitute my individual response as Treasurer of the 14th District Mondale Committeeto the complaint filed by Americans for Hart, Inc. I received the complaint from you on May 22, 1984. In addition to the remarks found herein, I incorporate by reference, in its entirety the response filed by the Mondale for President Committee, Inc.(MPC) on April 30, 1984.

The 14th District Mondale Delegate Committee is composed of a number of persons who hoped to become delegates to the Texas Democratic Convention. A number of these persons were, in fact, elected as delegates and alternates to the state convention. The purpose of the 14th District Committee was to see that these people got to the convention as Mondale delegates. Under 11 C.F.R. Section 110.14(b) (2) we find the definition of a "delegate committee". This definition fits the 14th District Mondale Delegate Committee.

The delegate committee came into existence in early April, 1984, approximately one month before the May 5 precinct conventions. The committee raised and spent only about $485.00. As treasurer, I have determined, to the best of my ability, that those contributing to the delegate committee had not reached their $1,000 maximum for contributions to a candidate. However, it is my position that these contributors are not subject to that limitation because the delegate committee is independent of MPC. It may also be important to note that all contributions received by the delegate commitee were from individuals. We received no money from political action committees.

I am attaching as Exhibit A copies of my reports to the F.E.C.,showing the contributions and expenditures of the committee. In this state, delegate candidates' names are not listed on the ballot. Election occurs at the precinct convention. Most of the funds expended by the delegate committee were spent on a letter to persons who had attended such conventions in the past.Other than that, the money was spent on office supplies. I am not even certain that this committee is required to file a report since we raised and spent less than $1,000. I am not a lawyer and I am unfamiliar with federal election laws. However, I am certain that there was no intent to evade any requirements of the law on my part.

If the Commission would like further information, please feel free to contact me.

Yours truly,

Roger Duncan

Roger Duncan
Treasurer
14th District Mondale Delegate Committee
1407A Bridgeway
Austin, Texas 78704

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

(Summary Page)

ALIGN AREA | ALIGN AREA

1. Name of Committee (In Full)

14th District Mondale Delegate Committee

Address (Number and Street)

1401A Bridgeway

City, State and ZIP Code

Austin, Tx. 78704

☐ Check here if address is different than previously reported.

2. FEC Identification Number

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

4. TYPE OF REPORT (Check appropriate boxes)

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

(b) Is this Report an Amendment?

☐ YES ☒ NO

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SUMMARY	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period 4/1/84 through 4/30/84		
6.(a) Cash on hand January 1, 19 84		$ 0
(b) Cash on Hand at Beginning of Reporting Period	$ 0	
(c) Total Receipts (from Line 18)	$ 485.00	$
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ 485.00	$ 485.00
7. Total Disbursements (from Line 28)	$ 328.71	$
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 156.29	$
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)	$ 0	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	$ 0	

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

Roger Duncan
Type or Print Name of Treasurer

Roger Duncan
SIGNATURE OF TREASURER

6/4/84
Date

For further information contact:
Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4068

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

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

FEC FORM 3X (3/80)

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

Name of Committee (In Full): 14th District Mondale Delegate Committee

Report Covering the Period: From: 4/1/84 To: 4/30/84

	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date	
I. RECEIPTS			
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees	485.00	485.00	11(a)
(Memo Entry Unitemized $)			
(b) Political Party Committees			11(b)
(c) Other Political Committees			11(c)
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c))	485.00	485.00	11(d)
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES			12
13. ALL LOANS RECEIVED	—	—	13
14. LOAN REPAYMENTS RECEIVED			14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)			15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			16
17. OTHER RECEIPTS (Dividends, Interest, etc.)			17
18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)	485.00	485.00	18
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES	328.71	328.71	19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES	—	—	20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			21
22. INDEPENDENT EXPENDITURES (use Schedule E)	328.71	328.71	22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. §441 a(d)) (Use Schedule F)			23
24. LOAN REPAYMENTS MADE			24
25. LOANS MADE			25
26. REFUNDS OF CONTRIBUTIONS TO			
(a) Individuals/Persons Other Than Political Committees			26(a)
(b) Political Party Committees			26(b)
(c) Other Political Committees			26(c)
(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))			26(d)
27. OTHER DISBURSEMENTS			27
28. TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	328.71	328.71	28
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)	485.00	485.00	29
30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)			30
31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)	485.00	485.00	31
32. TOTAL OPERATING EXPENDITURES from Line 19	328.71	328.71	32
33. OFFSETS TO OPERATING EXPENDITURES from Line 15			33
34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)	328.71	328.71	34

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SCHEDULE A

ITEMIZED RECEIPTS

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

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

Name of Committee (in Full)
14th District Mondale Delegate Committee

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
David Brown 4614 Bandy Hill Dr. Austin, Tx. 78723	AT&T	4/4/84	$30
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation Comm. Techn	4/5/84	$20
	Aggregate Year-to-Date-$ 50.		

B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Gayle Bruton 12522 Mistletoe Manchaca, Tx. 78852	Southwestern Bell	4/4/84	$25
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation Sve. Rep.		
	Aggregate Year-to-Date-$ 25.00		

C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Florence Clopton 1204 Leander Dr. Leander, Tx. 78641	AT&T	4/4/84	$25
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation Maintence Adm.		
	Aggregate Year-to-Date-$ 25.00		

D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Mr. & Mrs. W.L. Craven 11004 Ranch Rd. 2222 Austin, Tx. 78732	none	4/5/84	$100.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation retired		
	Aggregate Year-to-Date-$ 100.00		

E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Catherine Darby Rt. 1 Box 157G Manor , Tx. 78853	C.W.A.	4/5/84	$25.
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation Clerk		
	Aggregate Year-to-Date-$25.00		

F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Denise Donnelly P.O. Box 14045 Austin, Tx. 78761	AT&T	4/5/84	$50.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation Svce. Ordr. Writer		
	Aggregate Year-to-Date-$50.00		

G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Mrs. Thomas R. Armstrong 17917 Lafayette Dr. Leander, Tx. 78641	AT&T	4/5/84	$70.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation Mkt. rep.		
	Aggregate Year-to-Date-$70.00		

SUBTOTAL of Receipts This Page (optional)	
TOTAL This Period (last page this line number only)	

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SCHEDULE A

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

Name of Committee (in Full)
14th District Mondale Delegate Committee

A. Full Name, Mailing Address and ZIP Code Lorna Pike 3402A Southoak Austin, Tx. 78704 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer AT&T Occupation Svce. rep. Aggregate Year-to-Date-$ 25.00	Date (month, day, year) 4/4/84	Amount of Each Receipt this Period $25.00
B. Full Name, Mailing Address and ZIP Code Howard Pyle 4508 Tejas Trail Austin, Texas 78745 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Southwestern Bell Occupation Systems Tech. Aggregate Year-to-Date-$ 25.00	Date (month, day, year) 4/4/84	Amount of Each Receipt This Period $25.00
C. Full Name, Mailing Address and ZIP Code Evalena Smith 5900 Garden Oaks Dr. Austin, Texas 78745 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer AT&T Occupation Comm-Svc. Observer Aggregate Year-to-Date-$ 25.00	Date (month, day, year) 4/5/84	Amount of Each Receipt This Period $25.00
D. Full Name, Mailing Address and ZIP Code A.L. Spence 5701 Oakclaire Dr. Austin, Tx. 78735 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Southwestern Bell Occupation Tech. Aggregate Year-to-Date-$ 25.00	Date (month, day, year) 4/4/84	Amount of Each Receipt This Period $25.00
E. Full Name, Mailing Address and ZIP Code Roger Duncan 1407A Bridgeway Austin, Texas 78704 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer City Of Austin Occupation City Councilmember Aggregate Year-to-Date-$	Date (month, day, year) 4/5/84	Amount of Each Receipt This Period $20.00
F. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date-$	Date (month, day, year)	Amount of Each Receipt This Period
G. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date-$	Date (month, day, year)	Amount of Each Receipt This Period
SUBTOTAL of Receipts This Page (optional)			
TOTAL This Period (last page this line number only)			$485.00

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SCHEDULE D
(Revised 3/80)

DEBTS AND OBLIGATIONS
Excluding Loans

Page 1 of 1 for
LINE NUMBER ____
(Use separate schedules for each numbered line)

Name of Committee (in Full) 14th District Mondale Delegate Committee	Outstanding Balance Beginning of This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor None				
Nature of Debt (Purpose):				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
1) SUBTOTALS This Period This Page (optional)				
2) TOTAL This Period (last page this line only)				
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)				0
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)				0

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SCHEDULE B **ITEMIZED DISBURSEMENTS**

Page ____ of ____ for
LINE NUMBER _____
(Use separate schedule(s) for each category of the Detailed Summary Page)

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

Name of Committee (in Full)

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			

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SCHEDULE C
(Revised 3/80)

LOANS

Page 1 of 1 for LINE NUMBER ____
(Use separate schedules for each numbered line)

Name of Committee (in Full)
14th District Mondale Delegate Committee

A. Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Cumulative Payment To Date	Balance Outstanding at Close of This Period
None Election: ☐ Primary ☐ General ☐ Other (specify):			

Terms: Date Incurred _____ Date Due _____ Interest Rate _____ %(apr) ☐ Secured

List All Endorsers or Guarantors (if any) to Item A

1. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding: $	
2. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding: $	
3. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding: $	

B. Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Cumulative Payment To Date	Balance Outstanding at Close of This Period
Election: ☐ Primary ☐ General ☐ Other (specify):			

Terms: Date Incurred _____ Date Due _____ Interest Rate _____ %(apr) ☐ Secured

List All Endorsers or Guarantors (if any) to Item B

1. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding: $	
2. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding: $	
3. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding: $	

SUBTOTALS This Period This Page (optional)	0
TOTALS This Period (last page in this line only)	0

Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.

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SCHEDULE E

ITEMIZED INDEPENDENT EXPENDITURES

(See Reverse Side for Instructions)

Name of Committee (In Full)	I.D. No.
14th District Mondale Delegate Committee	

Full Name, Mailing Address & ZIP Code of Each Payee	Purpose of Expenditure	Date (month, day, year)	Amount	Name of Federal Candidate supported or opposed by the expenditure & office sought
Worley Printing 731 W. 23rd Austin, Tx. 78705	Letters and envelopes to past delegates	4/19/84	$203.05	Walter Mondale ☒ Support ☐ Oppose
Travis Co. Assessor-Collector Travis Co. Ct.house Annex Austin, Tx. 78701	Street index	4/12/84	$14.	same as above ☐ Support ☐ Oppose
Common Cause 1200 Guadalupe # 201 Austin, Tx. 78701	Tickets	4/16/84	$20	same ☐ Support ☐ Oppose
Abel Stationers 500 Congress Austin, Tx. 78701	offfice supplies	4/17/84	$29.96	same ☐ Support ☐ Oppose
Worth Beal Rental 3007 Longhorn Blvd. Austin, Tx. 78759	table rental	4/19/84	$29.93	same ☐ Support ☐ Oppose
Misc. supplies, stamps			$31.77	same ☐ Support ☐ Oppose

(a) SUBTOTAL of Itemized Independent Expenditures	$ 296.94	
(b) SUBTOTAL of Unitemized Independent Expenditures	$ 31.77	
(c) TOTAL Independent Expenditures	328.71	$

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, concert with, or at the request or suggestion of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures did not involve the financing of dissemination, distribution, or republication in whole or in part of any campaign materials prepared by the candidate, his campaign committee, or their agent.

Signature _____ Date _____

Subscribed and sworn to before me this _____ day of _____, 19__

My Commission expires _____

NOTARY PUBLIC _____

8504050040 7

SCHEDULE F

ITEMIZED COORDINATED EXPENDITURES MADE BY POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S) ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE (2 U.S.C. §441a(d))

Page ___ of ___ for LINE NUMBER ____

(To be used only by Political Committees in the General Election)

Name of Political Committee (In Full)				
Has your Committee been designated to make coordinated expenditures by a political party committee? ☐ YES ☐ NO If YES, name the designating committee:				
Full Name, Mailing Address and ZIP Code of Subordinate Committee				
Full Name, Mailing Address and ZIP Code of Each Payee	**Name of Federal Candidate Supported, State, District & Office Sought**	**Purpose of Expenditure**	**Date (month, day, year)**	**Amount**
	Aggregate General Election Expenditure for this Candidate—$			
Full Name, Mailing Address and ZIP Code of Each Payee	**Name of Federal Candidate Supported, State, District & Office Sought**	**Purpose of Expenditure**	**Date (month, day, year)**	**Amount**
	Aggregate General Election Expenditure for this Candidate—$			
Full Name, Mailing Address and ZIP Code of Each Payee	**Name of Federal Candidate Supported, State, District & Office Sought**	**Purpose of Expenditure**	**Date (month, day, year)**	**Amount**
	Aggregate General Election Expenditure for this Candidate—$			
Full Name, Mailing Address and ZIP Code of Each Payee	**Name of Federal Candidate Supported, State, District & Office Sought**	**Purpose of Expenditure**	**Date (month, day, year)**	**Amount**
	Aggregate General Election Expenditure for this Candidate—$			
SUBTOTAL of Expenditures This Page (optional)				
TOTAL This Period (last page this line number only)				

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For a Political Committee Other Than an Authorized Committee

RECEIVED AT THE FEC

(Summary Page)

84 JUN 8 AM 8:03

ALIGN AREA

1. Name of Committee (In Full)

14th District Mondale Delegate Committee

Address (Number and Street)

1407A Bridgeway

City, State and ZIP Code

Austin, Tx. 78704

☐ Check here if address is different than previously reported.

2. FEC Identification Number

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

4. TYPE OF REPORT (Check appropriate boxes)

(a) ☐ April 15 Quarterly Report ☐ October 15 Quarterly Report

☐ July 15 Quarterly Report ☐ January 31 Year End Report

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

☒ Monthly Report for May, 1984

☐ Twelfth day report preceding _____ (Type of Election)

election on _____ in the State of _____

☐ Thirtieth day report following the General Election

on _____ in the State of _____

☐ Termination Report

(b) Is this Report an Amendment?

☐ YES ☒ NO

8500400500409

SUMMARY	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period May 1 through May 31, 1984		
6. (a) Cash on hand January 1, 19 84		$ 0
(b) Cash on Hand at Beginning of Reporting Period	$ 156.29	
(c) Total Receipts (from Line 18)	$ 0	$
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ 156.29	$ 156.29
7. Total Disbursements (from Line 28)	$ 0	$
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 156.29	$
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)	$ 0	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	$ 0	

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

Roger Duncan
Type or Print Name of Treasurer

Roger Duncan
SIGNATURE OF TREASURER

Date 6/5/84

For further information contact:
Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4068

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

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

FEC FORM 3X (3/80)

of Receipts and Disbursements
(Page 2, FEC FORM 3X)

Name of Committee (In Full)
14th District Mondale Delegate Committee

Reporting the Period
From: 4/30/84 To: 5/31/84

	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date	
I. RECEIPTS			
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees	0	$485.00	11(a)
(Memo Entry Unitemized $_____)			
(b) Political Party Committees	0	—	11(b)
(c) Other Political Committees	0	—	11(c)
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c))	0	$485.00	11(d)
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES	—		12
13. ALL LOANS RECEIVED	—		13
14. LOAN REPAYMENTS RECEIVED	—		14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	—		15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	—		16
17. OTHER RECEIPTS (Dividends, Interest, etc.)	—		17
18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)	0	$485.00	18
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES	0		19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES			20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			21
22. INDEPENDENT EXPENDITURES (use Schedule E)			22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES. (2 U.S.C. § 441 a(d)) (Use Schedule F)			23
24. LOAN REPAYMENTS MADE			24
25. LOANS MADE			25
26. REFUNDS OF CONTRIBUTIONS TO			
(a) Individuals/Persons Other Than Political Committees			26(a)
(b) Political Party Committees			26(b)
(c) Other Political Committees			26(c)
(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))			26(d)
27. OTHER DISBURSEMENTS	0		27
28. TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	0		28
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)	0		29
30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)			30
31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)			31
32. TOTAL OPERATING EXPENDITURES from Line 19			32
33. OFFSETS TO OPERATING EXPENDITURES from Line 15			33
34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)	0		34

85040500410

SCHEDULE A **ITEMIZED RECEIPTS**

Page 1 of 1 for LINE NUMBER _____
(Use separate schedule(s) for each category of the Detailed Summary Page)

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

Name of Committee (in Full)

A. Full Name, Mailing Address and ZIP Code -0- Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt this Period
B. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
C. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
D. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
E. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
F. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
G. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
SUBTOTAL of Receipts This Page (optional)			
TOTAL This Period (last page this line number only)			0

SCHEDULE B

ITEMIZED DISBURSEMENTS

Page ___ of ___
LINE NUMBER
(Use separate schedule(s) for each category of the Detailed Summary Page)

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

Name of Committee (in Full)

A. Full Name, Mailing Address and ZIP Code — 0 —	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			

8504050041 2

SCHEDULE C
(Revised 3/80)

LOANS

Page 1 of 1 for
LINE NUMBER ____
(Use separate schedules for each numbered line)

Name of Committee (in Full)
14th District Mondale Delegate Committee

A. Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Cumulative Payments To Date	Balance Outstanding at Close of This Period
NONE Election: ☐ Primary ☐ General ☐ Other (specify):			
Terms: Date Incurred _____ Date Due _____ Interest Rate _____ %(apr) ☐ Secured			
List All Endorsers or Guarantors (if any) to Item A			
1. Full Name, Mailing Address and ZIP Code Name of Employer Occupation Amount Guaranteed Outstanding: $			
2. Full Name, Mailing Address and ZIP Code Name of Employer Occupation Amount Guaranteed Outstanding: $			
3. Full Name, Mailing Address and ZIP Code Name of Employer Occupation Amount Guaranteed Outstanding: $			

B. Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Cumulative Payments To Date	Balance Outstanding at Close of This Period
Election: ☐ Primary ☐ General ☐ Other (specify):			
Terms: Date Incurred _____ Date Due _____ Interest Rate _____ %(apr) ☐ Secured			
List All Endorsers or Guarantors (if any) to Item B			
1. Full Name, Mailing Address and ZIP Code Name of Employer Occupation Amount Guaranteed Outstanding: $			
2. Full Name, Mailing Address and ZIP Code Name of Employer Occupation Amount Guaranteed Outstanding: $			
3. Full Name, Mailing Address and ZIP Code Name of Employer Occupation Amount Guaranteed Outstanding: $			
SUBTOTALS This Period This Page (optional)			
TOTALS This Period (last page in this line only)			

Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.

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SCHEDULE D
(Revised 3/80)

DEBTS AND OBLIGATIONS
Excluding Loans

Page ____ of ____ Pgs
LINE NUMBER ____
(Use separate schedule for each numbered line)

Name of Committee (In Full) 14th District Mondale Delegate Comm.	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor NONE				
Nature of Debt (Purpose):				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
1) SUBTOTALS This Period This Page (optional)				
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)				

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SCHEDULE E

ITEMIZED INDEPENDENT EXPENDITURES

(See Reverse Side for Instructions)

Page ____ of ____ Pages

Name of Committee (in Full)	I.D. No.

Full Name, Mailing Address & ZIP Code of Each Payee	Purpose of Expenditure	Date (month, day, year)	Amount	Name of Federal Candidate supported or opposed by the expenditure & office sought
-0-				☐ Support ☐ Oppose
				☐ Support ☐ Oppose
				☐ Support ☐ Oppose
				☐ Support ☐ Oppose
				☐ Support ☐ Oppose
				☐ Support ☐ Oppose

(a) SUBTOTAL of Itemized Independent Expenditures	$	
(b) SUBTOTAL of Unitemized Independent Expenditures	$	
(c) TOTAL Independent Expenditures		$

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, concert with, or at the request or suggestion of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures did not involve the financing of dissemination, distribution, or republication in whole or in part of any campaign materials prepared by the candidate, his campaign committee, or their agent.

_____ _____
Signature Date

Subscribed and sworn to before me this _____ day of _____, 19____

My Commission expires

_____ _____
NOTARY PUBLIC

85040500415

SCHEDULE F

POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S) ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE
(2 U.S.C. §441a(d))

Page ___ of ___ for LINE NUMBER ____

(To be used only by Political Committees in the General Election)

Name of Political Committee (in Full)				
Has your Committee been designated to make coordinated expenditures by a political party committee? ☐ YES ☐ NO If YES, name the designating committee:				
Full Name, Mailing Address and ZIP Code of Subordinate Committee — 0 —				
Full Name, Mailing Address and ZIP Code of Each Payee	**Name of Federal Candidate Supported, State, District & Office Sought**	**Purpose of Expenditure**	**Date (month, day, year)**	**Amount**
	Aggregate General Election Expenditure for this Candidate—$			
Full Name, Mailing Address and ZIP Code of Each Payee	**Name of Federal Candidate Supported, State, District & Office Sought**	**Purpose of Expenditure**	**Date (month, day, year)**	**Amount**
	Aggregate General Election Expenditure for this Candidate—$			
Full Name, Mailing Address and ZIP Code of Each Payee	**Name of Federal Candidate Supported, State, District & Office Sought**	**Purpose of Expenditure**	**Date (month, day, year)**	**Amount**
	Aggregate General Election Expenditure for this Candidate—$			
Full Name, Mailing Address and ZIP Code of Each Payee	**Name of Federal Candidate Supported, State, District & Office Sought**	**Purpose of Expenditure**	**Date (month, day, year)**	**Amount**
	Aggregate General Election Expenditure for this Candidate—$			
SUBTOTAL of Expenditures This Page (optional)				
TOTAL This Period (last page this line number only)				

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Roger Duncan, Treasurer
14th District Mondale
Delegate Committee
1407A Bridgeway
Austin, TX 78704

Re: MUR 1667

Dear Mr. Duncan:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

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SCHEDULE F

ITEMIZED COORDINATED EXPENDITURES MADE BY POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S) ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE
(2 U.S.C. §441a(d))

Page ___ of ___ for LINE NUMBER ___

(To be used only by Political Committees in the General Election)

Name of Political Committee (In Full)

Has your Committee been designated to make coordinated expenditures by a political party committee? ☐ YES ☐ NO
If YES, name the designating committee:

Full Name, Mailing Address and ZIP Code of Subordinate Committee

-0-

Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
	Aggregate General Election Expenditure for this Candidate—$			
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
	Aggregate General Election Expenditure for this Candidate—$			
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
	Aggregate General Election Expenditure for this Candidate—$			
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
	Aggregate General Election Expenditure for this Candidate—$			
SUBTOTAL of Expenditures This Page (optional)				
TOTAL This Period (last page this line number only)				

85040500417

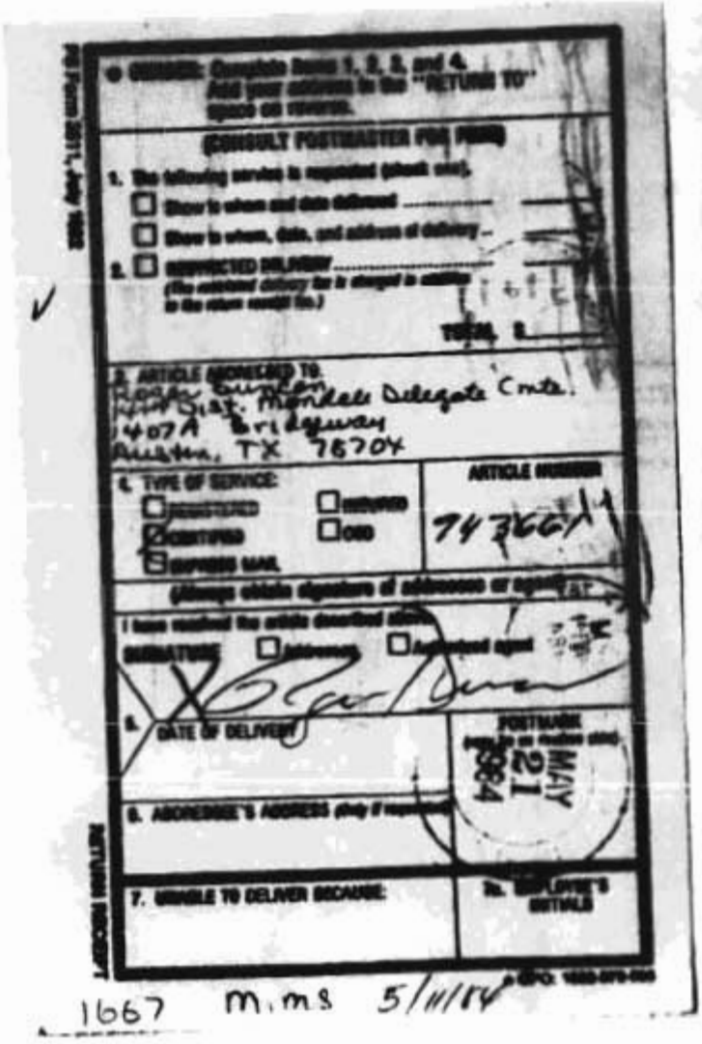
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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



8504050041 8

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Joseph DeLorenzo, Treasurer
2nd District Delegate Committee
For Mondale
1910 Smith Street, Suite 9
N. Providence, RI 02911

Re: MUR 1667

Dear Mr. DeLorenzo:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

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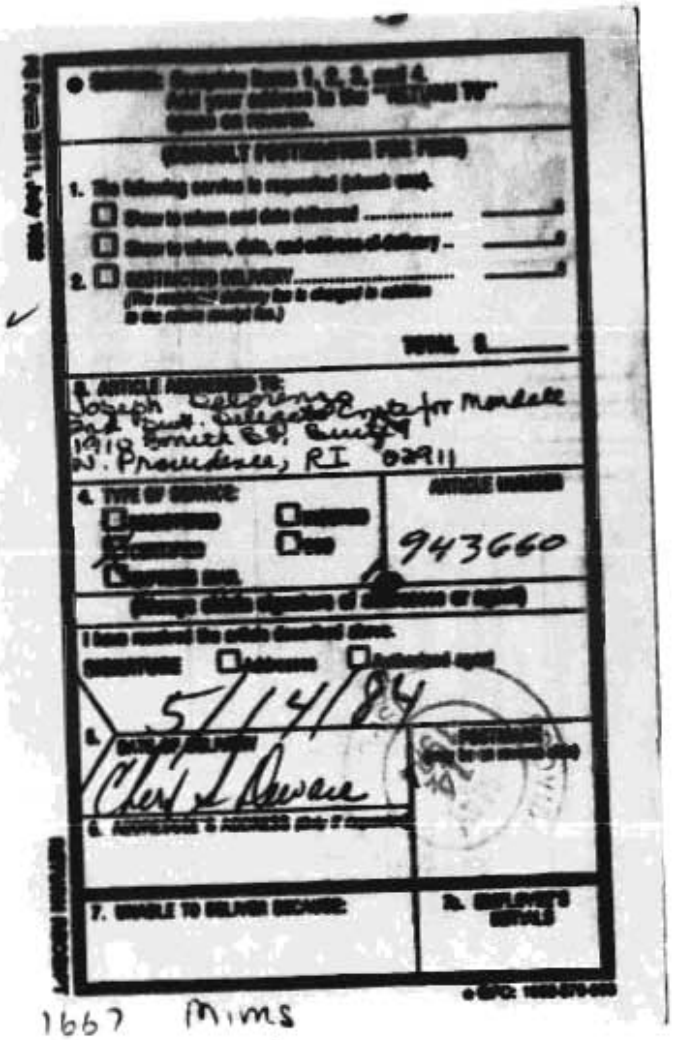
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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



8504050042

RECEIVED AT THE FEC
6 0 0 #4516
84 AUG 31 A8:38

COFFEY, MCGOVERN, NOEL & NEAL, LTD.
COUNSELLORS AT LAW

20 Washington Place
Providence, Rhode Island 02903
(401) 274-1144
Telex 927571 "COMMON"

RECEIVED
OFFICE OF THE
GENERAL COUNSEL
84 AUG 31 A9:45

August 28, 1984

Steven Mims, Esq.
Federal Election Commission
Washington, DC 20463

Re: MUR 1704
1st District Delegate Committee
for Mondale (R.I.)

Dear Mr. Mims:

Please find enclosed a copy of the amended Statement of Organization for the 1st Congressional District. As you can tell from the statement, we have amended it to indicate both committee's affiliation with each other.

It is presently the committee's position that no violation of the Federal Election Campaign Act of 1971 has taken place. Therefore, we do not wish to enter into a conciliation agreement at this time. Although we admit our failure to note the affiliations on the original Statement of Organization, our consolidated financial report should have clearly indicated the committees' affiliation.

It would be greatly appreciated if the Commission could refer us to a prior instance where a violation was found to exist because of such a technical omission. If such a precedent exists, this committee will reevaluate its present position concerning conciliation. We hope the amended Statement of Organization will resolve the present controversy and indicate our willingness to fully disclose any and all affiliations between the committees.

Please call me if you have any questions.

Very truly yours,

John P. McGann

John P. McGann
Attorney for 1st Delegate
Committee for Mondale

1301 Pennsylvania Avenue, N. W.
Washington, D. C. 20004
(202) 737-1000

108 West Shore Road
Warwick, Rhode Island 02889
(401) 274-1144

8504050042 1

STATEMENT OF ORGANIZATION

(see reverse side for instructions)

RECEIVED AT THE FEC

1. (a) Name of Committee (in Full) ☐ Check if name or address is changed.
1st District Delegate Committee for Mondale

2. Date
August 23, 1984

(b) Address (Number and Street)
1910 Smith Street, Suite 9

3. FEC Identification Number

(c) City, State and ZIP Code
North Providence, RI 02911

4. Is this an amended Statement? XX YES ☐ NO

5. TYPE OF COMMITTEE (check one):

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

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

Name of Candidate	Candidate Party Affiliation	Office Sought	State/District

XX (c) This committee supports/opposes only one candidate Walter F. Mondale (name of candidate) and is NOT an authorized committee.

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

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

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

6. Name of Any Connected Organization or Affiliated Committee	Mailing Address and ZIP Code	Relationship
2nd District Delegate Committee for Mondale	1910 Smith Street, Suite 9 North Providence, RI 02911	Affiliated

RECEIVED
FEDERAL ELECTION COMMISSION
GENERAL COUNSEL
1984 AUG 31 AM 8:45

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

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

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

Full Name	Mailing Address and ZIP Code	Title or Position
		Treasurer

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

Full Name	Mailing Address and ZIP Code	Title or Position
Salvatore Mancini	30 East Avenue North Providence, RI	Treasurer

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

Name of Bank, Depository, etc.	Mailing Address and ZIP Code
Greater Providence Deposit	62 Dorrance Street Providence, RI 02903

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

Salvatore Mancini
Type or Print Name of Treasurer

Salvatore Mancini
SIGNATURE OF TREASURER

Aug 28/84
Date

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

For further information contact: Federal Election Commission, Toll Free 800-424-9530, Local 202-523-4068

FEC FORM 1 (3/80)

85040500422

EY, McGOVERN, NOEL & NEAL, LTD.
COUNSELLORS AT LAW
20 WASHINGTON PLACE
PROVIDENCE, RHODE ISLAND 02903

84 AUG 31 A 8:

Steven Mims, Esq.
Federal Election Commission
Washington, DC 20463

84 AUG 31 A 9:45

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Salvatore Mancini, Treasurer
1st District Delegate Committee
For Mondale
1910 Smith Street, Suite 9
N. Providence, RI 02911

Re: MUR 1667

Dear Mr. Mancini:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

8504050042

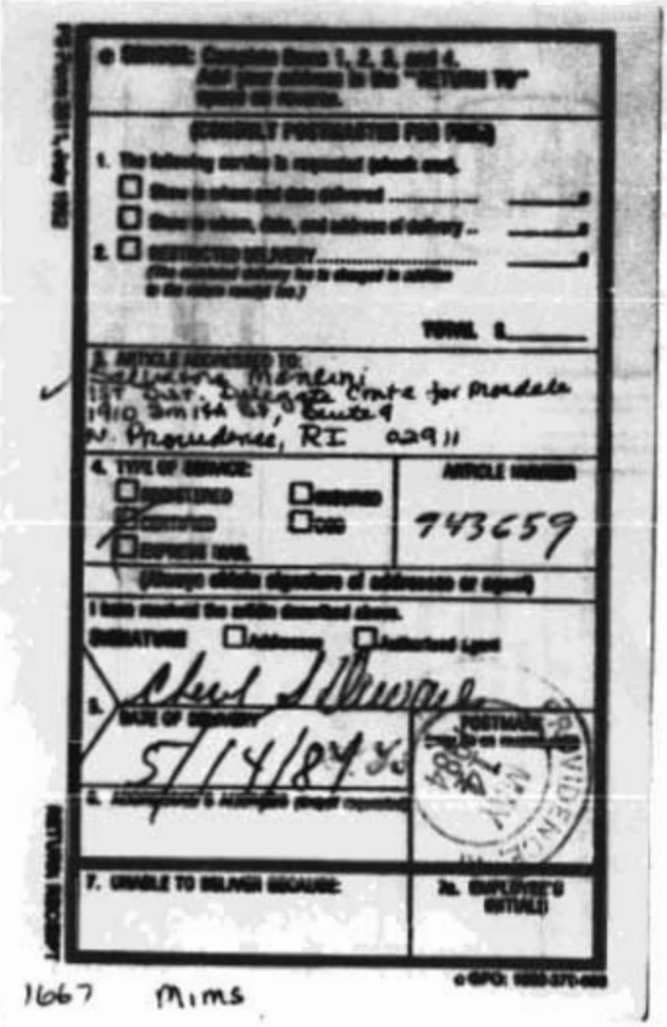
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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



8504050425

RECEIVED AT THE FEC
84 JUL 5 A8:

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1704

NAME OF COUNSEL: Michael E. Veve

ADDRESS: Suite 800
1919 Pennsylvania Ave., N.W.
Washington, D.C. 20006

TELEPHONE: (202) 887-1400

84 JUL 5 A10:18

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.

July 3, 1984
Date

Francisco González (by MEV)
Signature

RESPONDENT'S NAME: Comité Delegados Pro-Mondale

ADDRESS: P.O. Box 112
Trujillo Alto, Puerto Rico 00760

HOME PHONE: —

BUSINESS PHONE: —

8504005004 26

O'CONNOR & HANNAN
ATTORNEYS AT LAW
SUITE 800
1919 PENNSYLVANIA AVENUE, N.W.
WASHINGTON, D.C. 20006

84 JUL 5 A9:02

Federal Election Commission
Washington, D.C. 20463

350 27

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 19, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Delegates Committee With Mondale
P.O. Box 4029
San Juan, PR 00905

Re: MUR 1704

Dear Sir or Madam:

This letter is to notify you that on May 18, 1984 the Federal Election Commission received a complaint which alleges that the committee and its treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1704. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

3504050428

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 19, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Philadelphia Democratic County
Executive Committee
1421 Walnut Street
Philadelphia, PA 19102

Re: MUR 1704

Dear Sir or Madam:

This letter is to notify you that on May 18, 1984 the Federal Election Commission received a complaint which alleges that the committee and its treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1704. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

3504005042 9

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. 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

8504005004 30

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GCC #4657
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PEPPER, HAMILTON & SCHEETZ

ATTORNEYS AT LAW

1777 F STREET, N.W.
WASHINGTON, D.C. 20006
202-872-0100

50 SOUTH MARKET SQUARE
HARRISBURG, PA 17108
717-255-1155

100 RENAISSANCE CENTER
DETROIT, MI 48243
313-259-7110

50TH FLOOR
THE FIDELITY BUILDING
123 SOUTH BROAD STREET
PHILADELPHIA, PENNSYLVANIA 19109-1099
215-563-2000
CABLE ADDRESS "DEPHIL PHILADELPHIA"
TELECOPIER (FAX) 215-735-6999 · (FAX) 215-568-0954
TELEX (WUI) 215-848-2477 · TWX 710-670-0777

600 SOUTH FLOWER STREET
LOS ANGELES, CA 90014
213-617-0101

510 HAMILTON STREET
ALLENTOWN, PA 18101
215-434-0104

ONE CORPORATE PARK DRIVE
WHITE PLAINS, NY 10604
914-694-4500

WRITER'S DIRECT DIAL NUMBER
215-893-3995

September 10, 1984

RECEIVED
OFFICE OF THE
GENERAL COUNSEL
84 SEP 12 P 1:52

Stephen Mims, Esquire
General Counsel's Office
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: Pennsylvania At-Large Delegates For Mondale,
MUR 1667, 1704

Dear Mr. Mims:

In response to the Commission's "reason to believe" letter of August 14, 1982, I am enclosing the affidavit of Joanne Ciulla, the treasurer of Pennsylvania At-Large Delegates For Mondale, explaining that all contributions received by the Committee were reported and supplying documentary proof.

The Commission's concern seems to stem from the apparent practice of the Ironworkers Union of forwarding its contributions to local unions for retransmittal to the ultimate recipients. Because checks were received from local union addresses, Ms. Ciulla recorded those addresses on her report. If this was incorrect, and all the contributions at issue must be recorded with the union's Washington, D.C. address, I am sure Ms. Ciulla is willing to file an amended report.

Please let me know what, if any, further steps are required. Ms. Ciulla has moved to Massachusetts and is anxious to close the Committee.

Yours truly,

James M. Beck

JMB:ecg
Enclosure

P.S. I have not received any "reason to believe" letters regarding the local Mondale Delegate Committees which I also represent. Could you please inform me as to their status and whether they are free to terminate?

3504050431

COMMONWEALTH OF MASSACHUSETTS:
: SS
COUNTY OF MIDDLESEX :

AFFIDAVIT

I, Joanne B. Ciulla, being duly sworn according to law, do depose and say:

1. I am the treasurer of the Pennsylvania At-Large Delegates for Mondale, and I am the author of its disclosure reports to the Federal Election Commission.

2. I am giving this affidavit in connection with litigation before the Federal Election Commission numbered MUR 1667 and 1704 and, specifically, in connection with the matter referred to in the Commission's letter of August 14, 1984 to my attorney, James M. Beck, which is attached as Exhibit "A".

3. In its August 14 letter, the Commission stated that it had found reason to believe "that the Pennsylvania At-Large Delegates for Mondale, and Joanne Ciulla, as treasurer, failed to report receiving contributions totaling $5,000 from the Ironworkers Political Action League."

4. For the following reasons, the Commission's belief regarding these contributions is mistaken.

5. The March, 1984 Monthly Report of the Ironworkers Political Action League, on page 2 of its listing of itemized

3504050432

disbursements, reflects a total of $5,000 in contributions to Pennsylvania At-Large Delegates for Mondale. The Ironworkers' March, 1984 report is attached as Exhibit "B".

6. The Ironworkers' March, 1984 report indicates that the contributions to the Pennsylvania At-Large Delegates for Mondale took the form of four checks: one check for $2,000 and three checks for $1,000 each.

7. An asterisk next to one of the $1,000 checks indicates that it was "returned and voided after close of report period." Thus the contributions received by Pennsylvania At-Large Delegates for Mondale from the Ironworkers Political Action League consisted of only three checks totaling $4,000.

8. The Ironworkers' March, 1984 report indicates that the three checks totaling $4,000 were drawn on March 28, 1984.

9. None of the three Ironworkers checks totaling $4,000 was received by Pennsylvania At-Large Delegates for Mondale prior to the close of its first quarter reporting period on March 31, 1984.

10. The July 15, 1984 Quarterly Report of Pennsylvania At-Large Delegates for Mondale reflects the receipt of each of the three Ironworkers checks totaling $4,000, and is attached as Exhibit "C".

8 5 0 4 0 5 0 4 3 3

11. The fourth entry on page one of the Itemized Receipts section of Pennsylvania At-Large Delegates for Mondale's July 15 Quarterly Report reflects the receipt of $2,000 from "Ironworkers Pol. Action League c/o Ironworkers Local #3 PAC, 2201 Liberty Avenue, Pittsburgh, PA 15222." The "Aggregate Year-to-Date--$" is listed at "2,000." Copies of the envelope in which this check was received and of the check stub are attached as Exhibits "D" and "E" respectively.

12. The fifth entry on page one of the Itemized Receipts section of Pennsylvania At-Large Delegates for Mondale's July 15 Quarterly Report reflects the receipt of $1,000 from "Ironworkers Pol. Action League, 1750 N.Y. Ave. N.W., Washington, D.C. 20006." The "Aggregate Year-to-Date--$" is listed at "3,000." A copy of the check stub is attached as Exhibit "F".

13. The second entry on page two of the Itemized Receipts section of Pennsylvania At-Large Delegates for Mondale's July 15 Quarterly Report reflects the receipt of $1,000 from "Ironworkers P.A.L., 981 N. Peifers Lane, Harrisburg, PA 17109." The "Aggregate Year-to-Date--$" is listed at "4,000." A copy of the envelope in which this check was received is attached as Exhibit "G". Two letters which were received with this contribution are attached as Exhibits "H" and "I".

3504304

14. The Pennsylvania At-Large Delegates for Mondale reported in full the three checks totaling $4,000 which it received from the Ironworkers Political Action League.

15. The different addresses recorded in the Pennsylvania At-Large Delegates for Mondale's July 15 Quarterly Report reflect the addresses from which the checks were received. See Exhibits "D" and "G".

16. The checks themselves appear to have all been written by the Ironworkers Political Action League in Washington, DC. Exhibits "E", "F" and "I" indicate that the check numbers were 52, 53 and 55. Presumably the check which was voided was number 54.

17. Correspondence received with one of the checks indicates that the Ironworkers sent some of the checks to local unions in Pennsylvania for forwarding to Pennsylvania At-Large Delegates for Mondale. See Exhibits "H" and "I". My attorney has requested confirmation of this fact from the Ironworkers Political Action League, but has not yet received a response.

18. As treasurer for Pennsylvania's At-Large Delegates for Mondale, I reported the entire $4,000 in contributions which were received from the Ironworkers Political Action League and aggregated them as required. See Exhibit "C". Because the

8504043

checks came to Pennsylvania At-Large Delegates for Mondale from different addresses, the July 15 Quarterly report reflects this fact.

19. Further the deponent sayeth not.

JOANNE B. CIULLA

Treasurer,
PENNSYLVANIA AT-LARGE
DELEGATES FOR MONDALE

Sworn to and subscribed
before me this 6th day
of September 1984

Notary Public

8504050043 6

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 14, 1984

James M. Beck, Esquire
Pepper, Hamilton and Scheetz
The Fidelity Building, 20th Floor
123 S. Broad Street
Philadelphia, Pennsylvania 19109

Re: MUR 1704
Pennsylvania At-Large Delegates
for Mondale
Joanne Ciulla, as treasurer

Dear Mr. Beck:

The Federal Election Commission previously notified your clients of complaints in MURs 1667 and 1704 alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended (the "Act"). Copies of the complaints were forwarded to your clients at that time.

On August 7, 1984, the Commission voted to merge MUR 1667 with MUR 1704. Accordingly, in all future correspondence, please reference MUR 1704 when addressing these matters. In addition, upon further review of the allegations contained in the complaint in MUR 1704 the Commission, also on August 7, 1984, determined that there is reason to believe that the Pennsylvania At-Large Delegates for Mondale and Joanne Ciulla, as treasurer, violated 2 U.S.C. § 434(b)(3)(B), a provision of the Act. Specifically, it appears that the Pennsylvania At-Large Delegates for Mondale, and Joanne Ciulla, as treasurer, failed to report receiving contributions totaling $5,000 from the Ironworkers Political Action League. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials within ten days of your receipt of this letter. All statements should be submitted under oath.

8504050437

EXHIBIT "A"

RECEIVED AUG 16 1984

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

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 your clients wish the matter to be made public. If you have any questions, please contact Stephen Mims, an attorney assigned to this matter, at (202)523-4143.

Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

Enclosures
Procedures

8504050043 3

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

RECEIVED BY THE FEC

84 APR 19 AM 8:00

Summary Page

ALIGN AREA

1 Name of Committee (In Full)

Ironworkers Political Action League

Address (Number and Street)

1750 New York Avenue, N.W.
Suite 400

City, State and ZIP Code

Washington, D.C. 20006

☐ Check here if address is different than previously reported.

2 FEC Identification Number
C00027359

3 ☐ This committee qualified as a multicandidate committee during the Reporting Period on ____ (Date)

4 TYPE OF REPORT (Check appropriate block)

(a) ☐ April 15 Quarterly Report ☐ October 15 Quarterly Report
☐ July 15 Quarterly Report ☐ January 31 Year End Report
☐ July 31 Mid Year Report (Non Election Year Only)
☒ Monthly Report for .. March 1984
☐ Twelve day report preceding ____ (Primary/General) election on ____ in the State of ____
☐ Thirty day report following the General Election on ____ in the State of ____
☐ Termination Report

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

SUMMARY

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5 Covering Period 3/1/84 through 3/31/84		
6 (a) Cash on hand January 1, 19 84		$ 159,203.10
(b) Cash on Hand at Beginning of Reporting Period	$ 178,512.35	
(c) Total Receipts (from Line 19)	$ 13,247.72	$ 43,014.01
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ 191,760.07	$ 202,217.11
7 Total Disbursements (from Line 28)	$ 22,150.00	$ 32,607.04
8 Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 169,610.07	$ 169,610.07
9 Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)	$ -0-	
10 Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	$ -0-	

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

Type or Print Name of Treasurer: John T. Traylor

Signature of Treasurer: John T. Traylor Date: April 16, 1984

For further information contact:
Federal Election Commission
Toll Free 800-424-9530
Local 202 523-4068

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

All previous editions of FEC FORM 3 are obsolete.

FEC FORM 3 (Rev. 10/83)

EXHIBIT "B"

3 5 3 4 0 5 0 4 3 9

DETAILED SUMMARY PAGE
of Receipts and Disbursements
(Form 3, FEC FORM 3P)

Ironworkers Political Action League C00027359

Report Covering the Period: From 3/1/84 To 3/31/84

	COLUMN A Total This Period	COLUMN B Calendar Year to Date	
I. RECEIPTS			
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees	[illegible]	[illegible]	11(a)
(Memo Entry Unitemized $ 10,912.06)			
(b) Political Party Committees	-0-	-0-	11(b)
(c) Other Political Committees	-0-	-0-	11(c)
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c))	10,912.06	33,268.41	11(d)
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES	[illegible]	[illegible]	12
13. ALL LOANS RECEIVED	-0-	-0-	13
14. LOAN REPAYMENTS RECEIVED	-0-	-0-	14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	-0-	-0-	15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	-0-	-0-	16
17. OTHER RECEIPTS (Dividends, Interest, etc.)	[illegible]	[illegible]	17
18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)	[illegible]	[illegible]	18
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES	-0-	[illegible]	19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES	-0-	-0-	20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	[illegible]	[illegible]	21
22. INDEPENDENT EXPENDITURES (use Schedule E)	-0-	-0-	22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. §441a(d)) (Use Schedule F)	-0-	-0-	23
24. LOAN REPAYMENTS MADE	-0-	-0-	24
25. LOANS MADE	-0-	-0-	25
26. REFUNDS OF CONTRIBUTIONS TO			
(a) Individuals/Persons Other Than Political Committees	-0-	-0-	26(a)
(b) Political Party Committees	-0-	-0-	26(b)
(c) Other Political Committees	-0-	-0-	26(c)
(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))	-0-	-0-	26(d)
27. OTHER DISBURSEMENTS	150.00	2,350.00	27
28. TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	22,150.00	32,607.04	28
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)	10,912.06	33,268.41	29
30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)	-0-	-0-	30
31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)	[illegible]	33,268.41	31
32. TOTAL OPERATING EXPENDITURES from Line 19	[illegible]	[illegible]	32
33. OFFSETS TO OPERATING EXPENDITURES from Line 15	[illegible]	[illegible]	33
34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)	[illegible]	[illegible]	34

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SCHEDULE A — ITEMIZED RECEIPTS — PAGE 1 OF 1 FOR LINE NUMBER 12

ANY INFORMATION COPIED FROM THIS REPORT MAY NOT BE SOLD OR USED BY ANY PERSON FOR SOLICITING CONTRIBUTIONS OR FOR COMMERCIAL PURPOSES

IRONWORKERS POLITICAL ACTION LEAGUE - C00027359

FULL NAME, MAILING ADDRESS, AND ZIP CODE	NAME OF EMPLOYER, OCCUPATION, AND AGGREGATE YEAR TO DATE	DATE	AMOUNT THIS PERIOD
IRONWORKERS L.U. 401 PAC 1929 SPRING GARDEN ST PHILADELPHIA PA 19130	$5,932.23	03/21/04	$932.23

SUBTOTAL THIS PAGE..... $932.23

TOTAL THIS PERIOD..... $932.23

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SCHEDULE A ITEMIZED RECEIPTS PAGE 1 OF 1 FOR LINE NUMBER 17

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IRONWORKERS POLITICAL ACTION LEAGUE - C00027359

FULL NAME, MAILING ADDRESS, AND ZIP CODE	NAME OF EMPLOYER, OCCUPATION, AND AGGREGATE YEAR TO DATE	DATE	AMOUNT THIS PERIOD
INTEREST MONEY MARKET ACCOUNT M&T BANK 1750 NEW YORK AVENUE, NW WASHINGTON DC 20006	$3,813.37	03/30/04	$1,403.43

SUBTOTAL THIS PAGE..... $1,403.43

TOTAL THIS PERIOD..... $1,403.43

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SCHEDULE B — ITEMIZED DISBURSEMENTS — PAGE 1 OF 3 FOR LINE NUMBER 21

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IRONWORKERS POLITICAL ACTION LEAGUE - C00027359

FULL NAME, MAILING ADDRESS, AND ZIP CODE	PURPOSE OF DISBURSEMENT / ELECTION TYPE	DATE	AMOUNT
THE BARRETT COMMITTEE 166 PLEASANT STREET MALDEN MA 02148	CONTRIBUTION-CONGRESSIONAL CANDIDATE 7TH CD MA PRIMARY	03/01/84	$500.00
DOUG WALGREN FOR CONGRESS COMM P O BOX 2525 PITTSBURGH PA 15222	CONTRIBUTION-CONGRESSIONAL CANDIDATE 18TH CD PA PRIMARY	03/01/84	$500.00
FOGLIETTA FOR CONGRESS 2 PENN CENTER PLAZA SUITE 710 PHILADELPHIA PA 19102	CONTRIBUTION-CONGRESSIONAL CANDIDATE 1ST CD PA PRIMARY	03/14/84	$500.00
KULP FOR CONGRESS COMMITTEE WINDMILL CREEK FARM RD #1 PORT ROYAL PA 17082	CONTRIBUTION-CONGRESSIONAL CANDIDATE 9TH CD PA PRIMARY	03/14/84	$300.00
HOWARD FOR CONGRESS COMMITTEE 500 STATE HIGHWAY 34 MATAWAN NJ 07747	CONTRIBUTION-CONGRESSIONAL CANDIDATE 2ND CD NEW JERSEY PRIMARY	03/14/84	$1,000.00
*3RD CD OF IL MONDALE DEL COMM 9312 WEST 107TH PLACE OAK LAWN IL 60453	CONTRIBUTION-3RD CD ILLINOIS MONDALE DELEGATE COMMITTEE PRIMARY	03/14/84	$5,000.00
NY ST AT LGE DEL COMM MONDALE 153 EAST 53RD STREET NEW YORK NY 10022	CONTRIBUTION-NY STATE AT LARGE DELEGATE COMM FOR MONDALE PRIMARY	03/28/84	$1,000.00
NY ST AT LGE DEL COMM MONDALE 153 EAST 53RD STREET NEW YORK NY 10022	CONTRIBUTION-NY STATE AT LARGE DELEGATE COMM FOR MONDALE PRIMARY	03/28/84	$1,000.00
SUBTOTAL THIS PAGE.....			$9,800.00

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IRONWORKERS POLITICAL ACTION LEAGUE - C00027359

FULL NAME, MAILING ADDRESS, AND ZIP CODE	PURPOSE OF DISBURSEMENT ELECTION TYPE	DATE	AMOUNT
NY ST AT LGE DEL COMM MONDALE 153 EAST 53RD STREET NEW YORK NY 10022	CONTRIBUTION-NY STATE AT LARGE DELEGATE COMM FOR MONDALE PRIMARY	03/28/84	$1,000.00
**NY ST AT LGE DEL COMM MONDALE 153 EAST 53RD STREET NEW YORK NY 10022	CONTRIBUTION-NY STATE AT LARGE DELEGATE COMM FOR MONDALE PRIMARY	03/28/84	$1,000.00
NY ST AT LGE DEL COMM MONDALE 153 EAST 53RD STREET NEW YORK NY 10022	CONTRIBUTION-NY STATE AT LARGE DELEGATE COMM FOR MONDALE PRIMARY	03/28/84	$1,000.00
PA AT LGE DEL FOR MONDALE 717 PINE STREET PHILADELPHIA PA 19106	CONTRIBUTION-PENNSYLVANIA AT LARGE DELEGATES FOR MONDALE PRIMARY	03/28/84	$2,000.00
PA AT LGE DEL FOR MONDALE 717 PINE STREET PHILADELPHIA PA 19106	CONTRIBUTION-PENNSYLVANIA AT LARGE DELEGATES FOR MONDALE PRIMARY	03/28/84	$1,000.00
*PA AT LGE DEL FOR MONDALE 717 PINE STREET PHILADELPHIA PA 19106	CONTRIBUTION-PENNSYLVANIA AT LARGE DELEGATES FOR MONDALE PRIMARY	03/28/84	$1,000.00
PA AT LGE DEL FOR MONDALE 717 PINE STREET PHILADELPHIA PA 19106	CONTRIBUTION-PENNSYLVANIA AT LARGE DELEGATES FOR MONDALE PRIMARY	03/28/84	$1,000.00
FRIENDS OF JIM YOUNG P O BOX 1581 ERIE PA 16507	CONTRIBUTION-CONGRESSIONAL CANDIDATE 21ST DISTRICT PA PRIMARY	03/29/84	$1,000.00
SUBTOTAL THIS PAGE.....			$9,000.00

SCHEDULE B ITEMIZED DISBURSEMENTS

ANY INFORMATION COPIED FROM THIS REPORT MAY NOT BE SOLD OR USED BY ANY PERSON FOR SOLICITING CONTRIBUTIONS OR FOR COMMERCIAL PURPOSES

IRONWORKERS POLITICAL ACTION LEAGUE - C00027359

FULL NAME, MAILING ADDRESS, AND ZIP CODE	PURPOSE OF DISBURSEMENT ELECTION TYPE	DATE	AMOUNT
FRIENDS OF PEYSER COMMITTEE BOX 1984 IRVINGTON NY 10533	CONTRIBUTION-CONGRESSIONAL CANDIDATE 20TH CD NY PRIMARY	03/29/84	$1,000.00
COMM TO REELECT MARIO BIAGGI 229 BROADWAY SUITE 1500 NEW YORK NY 10007	CONTRIBUTION-CONGRESSIONAL CANDIDATE 19TH CD NY PRIMARY	03/29/84	$500.00
GEPHARDT-IN-CONGRESS COMMITTEE 3800 HAMPTON AVENUE ST LOUIS MO 63109	CONTRIBUTION-CONGRESSIONAL CANDIDATE 3RD CD MO PRIMARY	03/29/84	$1,000.00

*Checks returned and voided after close of report period.

**We were advised after close of report period that check was not received. Stop payment issued.

SUBTOTAL THIS PAGE.....	$2,500.00
TOTAL THIS PERIOD.....	$21,300.00

13940050044

SCHEDULE B ITEMIZED DISBURSEMENTS

ANY INFORMATION COPIED FROM THIS REPORT MAY NOT BE SOLD OR USED BY ANY PERSON FOR SOLICITING CONTRIBUTIONS OR FOR COMMERCIAL PURPOSES

IRONWORKERS POLITICAL ACTION LEAGUE - C00027359

FULL NAME, MAILING ADDRESS, AND ZIP CODE	PURPOSE OF DISBURSEMENT ELECTION TYPE	DATE	AMOUNT
WHEELING LEAGUE WOMEN VOTERS R D 2 BOX 342A TRIADELPHIA WV 26059	CONTRIBUTION-WHEELING AREA LEAGUE OF WOMEN VOTERS	03/01/04	$100.00
OHIO AFL-CIO 271 EAST STATE STREET COLUMBUS OH 43215	CONTRIBUTION-OHIO AFL-CIO	03/01/04	$300.00
FRIENDS OF HANK KEARNEY COMM 744 KELLY STREET PITTSBURGH PA 15221	CONTRIBUTION-DEM STATE COMM 42ND SENATORIAL DISTRICT PA PRIMARY	03/02/04	$50.00
ED BRYSTAR'S CAMPAIGN COMM P O BOX 942 BUTLER PA 16001	CONTRIBUTION-STATE SENATORIAL CANDIDATE 21ST DISTRICT PA PRIMARY	03/07/04	$100.00
JANE F DOYLE FOR STATE REP P O BOX 1883 ALTOONA PA 16603	CONTRIBUTION-STATE REPRESENTATIVE 79TH DISTRICT PA PRIMARY	03/14/04	$300.00

SUBTOTAL THIS PAGE..... $850.00

TOTAL THIS PERIOD..... $850.00

23056780012356780012356780012356

REPORT OF RECEIPTS AND DISBURSEMENTS

For a Political Committee Other Than an Authorized Committee

(Summary Page)

ALIGN AREA | ALIGN AREA

1. Name of Committee (In Full)
Pennsylvania At-Large Delegates for Mondale

Address (Number and Street)
C/o Jeanne B. Ciulla
29 Birchmont St. #110

City, State and ZIP Code
Cambridge MA 02138

☑ Check here if address is different than previously reported.

2. FEC Identification Number
C00180679

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

4. TYPE OF REPORT (Check appropriate block)

(a) ☐ April 15 Quarterly Report ☐ October 15 Quarterly Report
☑ July 15 Quarterly Report ☐ January 31 Year End Report
☐ July 31 Mid-Year Report (Non-Election Year Only)
☐ Monthly Report for _____
☐ Twelfth day report preceding _____ (Primary/Runoff/Special/General Election) on _____ in the State of _____
☐ Thirtieth day report following the General Election on _____ in the State of _____
☐ Termination Report

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

SUMMARY	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period April 1, 1984 through July 15, 1984		
6. (a) Cash on hand January 1, 19 84		$ -0-
(b) Cash on Hand at Beginning of Reporting Period	$ 6380.15	
(c) Total Receipts (from Line 19)	$ 24,740.00	$ 53,240.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ 31,120.00	$ 53,240.00
7. Total Disbursements (from Line 29)	$ 30,820.15	$ 52,940.00
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 300.00	$ 300.00
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)	$	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	$ 2967.36	

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

Jeanne B. Ciulla
Type or Print Name of Treasurer

Jeanne B Ciulla July 15, 1984
SIGNATURE OF TREASURER Date

For further information contact:
Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4068

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

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

RECEIVED AUG 22 1984

RECEIVED AUG 22 1984

EXHIBIT "C"

3304050004417

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

Name of Committee (In Full): Pennsylvania At Large Delegate for Hart

Report Covering the Period: from April 1, 1984 to July 15, 1984

	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date	
I. RECEIPTS			
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees. (Memo Entry Unitemized $)	24,740.00	53,240.00	11(a)
(b) Political Party Committees.			11(b)
(c) Other Political Committees.			11(c)
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c))	24,740.00	53,240.00	11(d)
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES	-		12
13. ALL LOANS RECEIVED			13
14. LOAN REPAYMENTS RECEIVED			14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)			15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			16
17. OTHER RECEIPTS (Dividends, Interest, etc.)			17
18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)	24,740.00	53,240.00	18
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES	27,920.15	41,430.00	19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES			20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	3,000.00	11,500.00	21
22. INDEPENDENT EXPENDITURES (use Schedule E)			22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES. (2 U.S.C. § 441 a(d)) (Use Schedule F)			23
24. LOAN REPAYMENTS MADE			24
25. LOANS MADE			25
26. REFUNDS OF CONTRIBUTIONS TO			
(a) Individuals/Persons Other Than Political Committees.			26(a)
(b) Political Party Committees.			26(b)
(c) Other Political Committees.			26(c)
(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))			26(d)
27. OTHER DISBURSEMENTS			27
28. TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	30,920.15	52,930.00	28
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)	24,740.00	53,240.00	29
30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)			30
31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)			31
32. TOTAL OPERATING EXPENDITURES from Line 19	27,920.15	41,430.00	32
33. OFFSETS TO OPERATING EXPENDITURES from Line 15			33
34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)	27,920.15	41,430.00	34

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SCHEDULE A

ITEMIZED RECEIPTS

Page 1 of 3

LINE NUMBER 11b

Also separate schedule(s) for each category of the Detailed Summary Page

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Name of Committee (In Full)
P.A. At-Large Delegates for Mondale

A. Full Name, Mailing Address and ZIP Code Intl. Bro. of Telephone Workers PA Executive Board 1410 Chestnut St. Phila PA 19102 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year) 4/1	Amount of Each Receipt this Period $ 2,000
B. Full Name, Mailing Address and ZIP Code Phila. Intl. Bd. Amalgamated Clothing & Textile Workers AFL-CIO, CLC 22 South 22 St Phila PA Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year) 4/1	Amount of Each Receipt This Period $ 2,500
C. Full Name, Mailing Address and ZIP Code Engineers Pol. Ed. Committee 1125 Seventeenth St NW Washington, DC 20036 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year) 4/2	Amount of Each Receipt This Period $ 3,500
D. Full Name, Mailing Address and ZIP Code Ironworkers Pol. action League C/o Ironworkers Local #3 PAC 2291 Liberty ave. Pittsburgh PA 15222 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year) 3/28	Amount of Each Receipt This Period $ 2,000
E. Full Name, Mailing Address and ZIP Code Ironworkers Pol. action League 1750 N.Y. Ave NW Washington, DC 20006 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$ 3,000	Date (month, day, year) 3/28	Amount of Each Receipt This Period $ 1,000
F. Full Name, Mailing Address and ZIP Code Chase Enterprises (Roger M. Freeburg) One Financial Plaza Hartford Connecticut 06103 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Chase Enterprises Occupation Executive VP Aggregate Year-to-Date—$ 5,000	Date (month, day, year) 4/10	Amount of Each Receipt This Period $ 5,000
G. Full Name, Mailing Address and ZIP Code Peter Butterweiser 8325 St. Martins Lane Phila PA 19118 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer self employed Occupation Educational Consultant Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period $ 1,000
SUBTOTAL of Receipts This Page (optional)			$ 17,000
TOTAL This Period (last page this line number only)			

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SCHEDULE A **ITEMIZED RECEIPTS**

Page 2 of 3 for Line Number 11b
(Use separate schedule(s) for each category of the Detailed Summary Page)

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Name of Committee (In Full)
PA A+ - Large Delegates for Mondale

	Name of Employer / Occupation / Aggregate Year-to-Date	Date (month, day, year)	Amount of Each Receipt this Period
A. Full Name, Mailing Address and ZIP Code United Food + Commercial Workers Intl. Union 1775 K St. NW Wash. DC 20006 Receipt For: ● Primary ○ General ○ Other (specify):		4/18	$ 5,000
B. Full Name, Mailing Address and ZIP Code Ironworkers PA 1 781 N. Perfect Lane Hamburg, PA 17105 Receipt For: ● Primary ○ General ○ Other (specify):	Aggregate Year-to-Date—$ 4,000	4/11	$1,000
C. Full Name, Mailing Address and ZIP Code David Wade 175 Pine St. Phila PA 19103 Receipt For: ● Primary ○ General ○ Other (specify):		4/10	$ 50.00
D. Full Name, Mailing Address and ZIP Code Lewis Scone 1700 Market St Suite 2806 Phila PA 19103 Receipt For: ● Primary ○ General ○ Other (specify):		4/10	$ 25.00
E. Full Name, Mailing Address and ZIP Code Ed Rendell 3425 Warden Dr. Phila PA Receipt For: ● Primary ○ General ○ Other (specify):		4/11	$ 25.00
F. Full Name, Mailing Address and ZIP Code Richard Simonson 2929 Intl Union 1775 K NW Wash. DC 20006 Receipt For: ● Primary ○ General ○ Other (specify):		4/11	$ 30.00
G. Full Name, Mailing Address and ZIP Code Leonard B Shore 1263 Dixon La Rydal PA 19046 Receipt For: ● Primary ○ General ○ Other (specify):		4/11	$ 25.00
SUBTOTAL of Receipts This Page (optional)			6155
TOTAL This Period (last page this line number only)			

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Page 3 of 3 Pgs.
LINE NUMBER 11-B
(Also enter on scheduled for each category of the Detailed Summary Page)

SCHEDULE A — ITEMIZED RECEIPTS

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Name of Committee (in Full)

	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
A. Full Name, Mailing Address and ZIP Code Richard Ruben 1700 Market St Phila PA 19103	Occupation	4/11	$ 25.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—$		
B. Full Name, Mailing Address and ZIP Code Bernard M. Hulk P.O. Box 754 Bensalem PA 19020	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation	4/11	$ 25.00
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—$		
C. Full Name, Mailing Address and ZIP Code Democratic Senatorial Campaign Committee 2201 Wisconsin Ave. NW. Wash. DC 20007	Name of Employer This was for the sale of tickets to the Dinner	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation Committee	4/13	535.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—$		
D. Full Name, Mailing Address and ZIP Code New Hampshire 1st District Delegate Committee c/o Nancy Fagan 5 Hanna Dr., Merrimack NH	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation	4/8	1,000
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—$ 2500		
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation		
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—$		
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation		
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—$		
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation		
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—$		
SUBTOTAL of Receipts This Page (optional)			1585
TOTAL This Period (last page this line number only)			24740

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SCHEDULE B **ITEMIZED DISBURSEMENTS**

Page 1 of 4 for LINE NUMBER 19
(Use separate schedule(s) for each category of the Detailed Summary Page)

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Name of Committee (In Full)
PA At-Large Delegates for Mondale

A. Full Name, Mailing Address and ZIP Code Diane Thompson 1418 Walnut St Phila PA 19102	1A	Purpose of Disbursement Car rental Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/1	Amount of Each Disbursement This Period 414 28
B. Full Name, Mailing Address and ZIP Code Diane Thompson Same as above	2A	Purpose of Disbursement Petty Cash Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/1	Amount of Each Disbursement This Period 190.50
C. Full Name, Mailing Address and ZIP Code Diane Thompson Same	3H	Purpose of Disbursement Petty cash Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/2	Amount of Each Disbursement This Period 100.00
D. Full Name, Mailing Address and ZIP Code Mike Fragoso 1418 Walnut St Phila PA 19102	4AB	Purpose of Disbursement per diem Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/2	Amount of Each Disbursement This Period 200
E. Full Name, Mailing Address and ZIP Code Alan Quinlin 1418 Walnut St Phila PA 19102	4A	Purpose of Disbursement per diem Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/2	Amount of Each Disbursement This Period 245.50
F. Full Name, Mailing Address and ZIP Code Diane Thompson 1418 Walnut St Phila PA 19102	6A	Purpose of Disbursement $320 per diem #63 car expense Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/2	Amount of Each Disbursement This Period 383.78
G. Full Name, Mailing Address and ZIP Code Catherine Scott 1418 Walnut St Phila PA 19102	7A	Purpose of Disbursement per diem Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/2	Amount of Each Disbursement This Period 135.00
H. Full Name, Mailing Address and ZIP Code Hal Leach 1418 Walnut St Phila PA 3743 Jocelyn St NW Wash DC 20015	1	Purpose of Disbursement Travel expenses Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/2	Amount of Each Disbursement This Period 88.80
I. Full Name, Mailing Address and ZIP Code Al Quinlin 1418 Walnut St Phila PA 19102	2	Purpose of Disbursement Office expenses Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/2	Amount of Each Disbursement This Period 96.08
SUBTOTAL of Disbursements This Page (optional)				1763.70
TOTAL This Period (last page this line number only)				

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

SCHEDULE B **ITEMIZED DISBURSEMENTS**

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Name of Committee (in Full)
PA At Large Delegates for Mondale

A. Full Name, Mailing Address and ZIP Code Diane Thompson 1418 Walnut St Phila PA 19102	3	Purpose of Disbursement petty cash Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/3	Amount of Each Disbursement This Period $ 100.
B. Full Name, Mailing Address and ZIP Code Coleen Dougherty 1418 Walnut St Phila PA 19102	4	Purpose of Disbursement Per diem Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/2	Amount of Each Disbursement This Period $ 320
C. Full Name, Mailing Address and ZIP Code John O'Leary 1418 Walnut St Phila PA 19102	5	Purpose of Disbursement Per diem Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/2	Amount of Each Disbursement This Period $ 500
D. Full Name, Mailing Address and ZIP Code American Express Co.	6	Purpose of Disbursement Hotel Bill Staff Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/2	Amount of Each Disbursement This Period 137.36
E. Full Name, Mailing Address and ZIP Code Second CD Delegate for Mondale Anthony McKeel 632 Morgan Pl Phila PA 19139	8	Purpose of Disbursement Contribution Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 3/28	Amount of Each Disbursement This Period 1000.00
F. Full Name, Mailing Address and ZIP Code Diane Thompson same as above	9	Purpose of Disbursement US Air Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 3/28	Amount of Each Disbursement This Period 10.00
G. Full Name, Mailing Address and ZIP Code CPR Car Rental 1800 Haddon Rd Pennsauken NJ 08110	10	Purpose of Disbursement Car rental Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/2	Amount of Each Disbursement This Period $ 200
H. Full Name, Mailing Address and ZIP Code Kennedy Printing 5534 Baltimore Ave Phila PA 19143	11	Purpose of Disbursement Printing Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/3	Amount of Each Disbursement This Period $ 3000.00
I. Full Name, Mailing Address and ZIP Code Diane Thompson same	12	Purpose of Disbursement Petty Cash Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/3	Amount of Each Disbursement This Period 100.00
SUBTOTAL of Disbursements This Page (optional)				5167.
TOTAL This Period (last page this line number only)				

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SCHEDULE B **ITEMIZED DISBURSEMENTS**

Page 3 of 4 for LINE NUMBER 19
(Use separate schedule(s) for each category of the Detailed Summary Page)

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Name of Committee (In Full)
PA At-Large Delegates for Mondale

A. Full Name, Mailing Address and ZIP Code Kennedy Printing 5534 Balt. Ave. Phila PA 19143	14	Purpose of Disbursement Printing Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/4	Amount of Each Disbursement This Period $ 1290.90
B. Full Name, Mailing Address and ZIP Code Diane Thompson Same as above	15	Purpose of Disbursement Per diem Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/4	Amount of Each Disbursement This Period $ 280
C. Full Name, Mailing Address and ZIP Code Kennedy Printing Same as above	16	Purpose of Disbursement Printing Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/4	Amount of Each Disbursement This Period 2694.52
D. Full Name, Mailing Address and ZIP Code Publicity Inc. 250 W. Girard Ave Phila PA 19123	17	Purpose of Disbursement Printing Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/5	Amount of Each Disbursement This Period $ 5000.00
E. Full Name, Mailing Address and ZIP Code Custom Graphics 1813 Roosevelt St. Phila PA 19103	19	Purpose of Disbursement Lay-out Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/5	Amount of Each Disbursement This Period 1800
F. Full Name, Mailing Address and ZIP Code 84 Delegate 21st CD Belinda Bloss 2807 Oakwood Erie, PA 16508	20	Purpose of Disbursement Contribution Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/5	Amount of Each Disbursement This Period $ 1,000
G. Full Name, Mailing Address and ZIP Code John Bell 1418 Walnut St. Phila PA 19102	21	Purpose of Disbursement Per diem Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/6	Amount of Each Disbursement This Period $ 350
H. Full Name, Mailing Address and ZIP Code Diane Thompson Same	22	Purpose of Disbursement Petty cash Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period $ 100
I. Full Name, Mailing Address and ZIP Code Coleen Dougher 1418 Walnut St Phila PA 19102	23	Purpose of Disbursement Travel Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period $ 124
SUBTOTAL of Disbursements This Page (optional)				[illegible]
TOTAL This Period (last page this line number only)				

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SCHEDULE B **ITEMIZED DISBURSEMENTS**

LINE NUMBER 19
(Use separate schedule(s) for each category of the Detailed Summary Page)

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Name of Committee (In Full)
PA At Large Delegates for Mondale

A. Full Name, Mailing Address and ZIP Code 24 Glen Fletcher 3030 Tripoli Ln. Bowie, Md 20715	Purpose of Disbursement Per diem Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/6	Amount of Each Disbursement This Period $ 105
B. Full Name, Mailing Address and ZIP Code 25 Publicist Inc. 250 W. Guardian Phila PA 19123	Purpose of Disbursement Printed Materials Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/6	Amount of Each Disbursement This Period 3484.00
C. Full Name, Mailing Address and ZIP Code 26 Diane Thompson Same	Purpose of Disbursement Petty Cash Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/9	Amount of Each Disbursement This Period 100 00
D. Full Name, Mailing Address and ZIP Code 28 Icarus Printing 6334 Baltimore Phila PA 19143	Purpose of Disbursement Printing Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/10	Amount of Each Disbursement This Period 159.00
E. Full Name, Mailing Address and ZIP Code 29 Mike Fregan 1418 Walnut St Phila PA 19102	Purpose of Disbursement Office expenses Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/10	Amount of Each Disbursement This Period 98.34
F. Full Name, Mailing Address and ZIP Code 30 Gail Leach 3743 Jocelyn St. NW Wash. DC 20015	Purpose of Disbursement travel Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/10	Amount of Each Disbursement This Period 81.69
G. Full Name, Mailing Address and ZIP Code 31 Gail Leach Same as above	Purpose of Disbursement Per diem Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/11	Amount of Each Disbursement This Period 400.00
H. Full Name, Mailing Address and ZIP Code 32 Diane Thompson Same as above	Purpose of Disbursement Per diem Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/11	Amount of Each Disbursement This Period 400.00
I. Full Name, Mailing Address and ZIP Code 33 Mike Fregan Same as above	Purpose of Disbursement per diem Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/11	Amount of Each Disbursement This Period 500 00
SUBTOTAL of Disbursements This Page (optional)			5318.03
TOTAL This Period (last page this line number only)			

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SCHEDULE B

ITEMIZED DISBURSEMENTS

Page 5 of 6 for LINE NUMBER 18
(Use separate schedule(s) for each category of the Detailed Summary Page)

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Name of Committee (In Full)
PA At-Large Delegate for Mondale

	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Full Name, Mailing Address and ZIP Code 34 Kathleen Russell 701 Carolina Ave Reading PA 19605	Per diem Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/11	365.00
B. Full Name, Mailing Address and ZIP Code 35 Alan Gumby 1418 Walnut St Phila PA 19102	per diem Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/11	400.00
C. Full Name, Mailing Address and ZIP Code 36 Glen Tilsher 3030 Turquoise La Bowie MD 20715	Travel Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/11	74.25
D. Full Name, Mailing Address and ZIP Code 37 John O'Leary 2771 Beachwood Blvd. Pittsburgh, PA 15217	Per diem Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/11	300.00
E. Full Name, Mailing Address and ZIP Code 38 Coleen Dougher 1921 Biltmore St NW Wash DC	per diem Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/11	400.00
F. Full Name, Mailing Address and ZIP Code 39 John Bell 1418 Walnut St Phila PA 19102	per diem Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	4/11	350.00
G. Full Name, Mailing Address and ZIP Code 40 Pilot Network 1718 Walnut St Phila PA 19102	Food for Staff Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/12	124.71
H. Full Name, Mailing Address and ZIP Code 41 Drug Communications 505 Virginia ave Fort Washington, PA 19034	Tele-copier Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/12	325.68
I. Full Name, Mailing Address and ZIP Code 42 Custom Graphics 1813 Ronstead St Phila PA 19103	Printing Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/12	150.00
SUBTOTAL of Disbursements This Page (optional)			3084.64
TOTAL This Period (last page this line number only)			

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SCHEDULE B

ITEMIZED DISBURSEMENTS

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

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Name of Committee (In Full)
PA At Large Delegates for Mondale

A. Full Name, Mailing Address and ZIP Code 45 American Express Company	Purpose of Disbursement: Staff meal Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year): 4/12	Amount of Each Disbursement This Period: 101.00
B. Full Name, Mailing Address and ZIP Code 46 Williamson for 12 Congressional District 303 S Warren Ave Apollo, PA 15613	Purpose of Disbursement: Campaign Calendars Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year): 6/23	Amount of Each Disbursement This Period: 1000.00
C. Full Name, Mailing Address and ZIP Code 47 Bell of Pennsylvania 1835 Arch St 6th Fl. Phila PA 19103	Purpose of Disbursement: Phone Bill Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year): 6/25	Amount of Each Disbursement This Period: 1500.00
D. Full Name, Mailing Address and ZIP Code Joseph Cella 717 Pine St Phila PA 19106	Purpose of Disbursement: Office expenses Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year): 6/25	Amount of Each Disbursement This Period: 41.00
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement: Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year):	Amount of Each Disbursement This Period:
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement: Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year):	Amount of Each Disbursement This Period:
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement: Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year):	Amount of Each Disbursement This Period:
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement: Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year):	Amount of Each Disbursement This Period:
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement: Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year):	Amount of Each Disbursement This Period:
SUBTOTAL of Disbursements This Page (optional)			2642
TOTAL This Period (last page this line number only)			30820.15

85010504357

SCHEDULE D
(Revised 3/80)

DEBTS AND OBLIGATIONS
Excluding Loans

Page 1 of 1 for LINE NUMBER ____
(Use separate schedules for each numbered line)

Name of Committee (In Full) PA At-Large Delegate for Mark	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor Bell of Pennsylvania Related accounts 1835 arch St Phila PA 19103	4,467.32	-0-	$1,500.00	$2967.32
Nature of Debt (Purpose): Phone Bill				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
1) SUBTOTALS This Period This Page (optional)				
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)				

85040050453

8504050045 9

Ironworkers Local No. 3
Political Action Committee
2201 Liberty Avenue
Pittsburgh, PA 15222

BUILD UNION
BUY AMERICAN
MAILERS ADV.

PITTSBURGH, PA
PM
2 APR
1984

Pa. at Large Delegates for Mondale
% Joanne Ciulla, Treasurer
717 Pine Street
Philadelphia, PA. 19106

EXHIBIT "D"

8 5 0 5 0 0 0 5 0

IRONWORKERS POLITICAL ACTION LEAGUE

Contribution

№ 0052

2000

EXHIBIT "E"

IRONWORKERS POLITICAL ACTION LEAGUE

№ 0053

Contribution

1000

EXHIBIT "F"

8504050461

I.P.A.L.

IRONWORKERS POLITICAL ACTION LEAGUE

981 N. PEIFERS LANE • HARRISBURG, PA 17109

HARRISBURG, PA
PM
2 APR
1984

FIGHT

PENNSYLVANIA AT LARGE DELEGATES
FOR MONDALE
c/o Joanne Ciulla, Treasurer
717 Pine Street
Philadelphia, Pa. 19106

EXHIBIT "G"

I.P.A.L.

★IRONWORKERS POLITICAL ACTION LEAGUE★

901 N. PEPPERS LANE • HARRISBURG, PA 17109 • 717/564-8550

April 2, 1984

PENNSYLVANIA AT LARGE DELEGATES
FOR MONDALE
c/o Joanne Ciulla, Treasurer
717 Pine Street
Philadelphia, Pa. 19106

Dear Ms. Ciulla:

At the request of John H. Lyons, Chairman of Ironworkers Political Action League, I am forwarding a check in the amount of $1,000.00 to assist in the election of the Mondale delegates.

Very truly yours,

Warren H. Spangler

Warren H. Spangler
Business Agent
Local Union No. 404

WHS:hs

Encs.

EXHIBIT "H"

1750 New York Avenue, N.W.
Washington, D.C. 20006

202/383-4800

John H. Lyons
Chairman

Juel D. Drake
Secretary

John T. Traylor
Treasurer

Michael J. Brennan
Political Director

March 28, 1984

Mr. Warren H. Spangler, BA
Local Union No. 404
981 Peifers Lane
Harrisburg, PA 17109

Dear Sir and Brother:

I am pleased to enclose a check in the amount of $1,000.00 made payable to the Pennsylvania At Large Delegates for Mondale. This money is desperately needed to help elect delegates for Mondale and should be sent to Joanne Ciulla, Treasurer, 717 Pine Street, Philadelphia, PA 19106. Your immediate action is very crucial.

IPAL's funds are derived entirely from our members' voluntary contributions. Without participation at the local level, our union cannot succeed in the political arena and could not make the election contributions requested by the locals. Therefore, I want to take this opportunity to commend you and the members of Local 404 for your support of IPAL. Your checkoff program is a fine example of what can be done at the local level to make our voices heard in the political process.

I am sure that the Pennsylvania At Large Delegates for Mondale will appreciate our help. I look forward to hearing more good things about Local 404's political action program.

Fraternally yours,

John H. Lyons

CHAIRMAN

JHL/hds
enclosure - check #0055

EXHIBIT "1"

8504050461

RECEIVED AT THE FEC
84 AUG 20 A9:32

PEPPER, HAMILTON & SCHEETZ

ATTORNEYS AT LAW

1777 F STREET, N. W.
WASHINGTON, D. C. 20006
202-842-8100

10 SOUTH MARKET SQUARE
HARRISBURG, PA 17108
717-238-1158

100 RENAISSANCE CENTER
DETROIT, MI 48243
313-259-7110

20TH FLOOR
THE FIDELITY BUILDING
123 SOUTH BROAD STREET
PHILADELPHIA, PENNSYLVANIA 19109-1099
215-981-4000
CABLE ADDRESS "PEPPIL PHILADELPHIA"
TELECOPIER (#486) 215-238-0380 · (#2800) 215-988-0884
DEA (#2800) 215-546-3477 · TWX 710-670-0777

600 SOUTH OLIVE STREET
LOS ANGELES, CA 90014
213-617-5151

340 HAMILTON STREET
ALLENTOWN, PA 18101
215-434-0154

515 CORPORATE PARK DRIVE
WHITE PLAINS, NY 10604
914-694-4800

WRITER'S DIRECT DIAL NUMBER

(215) 893-3995

GCC
#4371

August 16, 1984

Stephen Mims, Esquire
General Counsel's Office
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: Pennsylvania At-Large Delegates for Mondale,
MUR 1667 & 1704

Dear Steve:

I am in receipt of the Commission's letter regarding its preliminary determination in the above matters. I am relieved by the Commission's apparent rejection of the claims of the complaints that the At-Large Committee was legally affiliated with various other political committees.

I do note that the Commission has found reason to believe that the At-Large Committee failed to report $5,000 in contributions from the Ironworkers Political Action League. Since failure to report contributions was not the major thrust of the above actions, I do not have the documents necessary to make any statements on this at this time.

I would like to accept your offer of conciliation. If any failure to report has occurred I am sure it was inadvertant. I do remember being told that there was some confusion with respect to Ironworker donations, although I do not remember the details. I am undertaking to obtain possession of the At-Large Committee's bank statements. If you could give me more information about the donations which you believe were not reported, such as their dates and amounts, I shall attempt to straighten the matter out. It is also possible that, at some point in the future, it will be necessary to obtain the cancelled checks from the Ironworkers.

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I may not be able to respond within ten days because Ms. Ciulla has moved to Cambridge, Massachusetts, however, I am trying to get the relevant records as quickly as possible. Thank you for your cooperation.

Yours truly,

James M. Beck

JMB/gmb

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ER, HAMILTON & SCHEETZ
20TH FLOOR
THE FIDELITY BUILDING
3 SOUTH BROAD STREET
ILADELPHIA, PA. 19109-1083

RECEIVED AT THE F
84 AUG 20 A9:

Stephen Mims, Esquire
General Counsel's Office
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

RECEIVED AT THE FEC
Gen # 3793
84 JUN 25 P1:11

PEPPER, HAMILTON & SCHEETZ

ATTORNEYS AT LAW

1777 F STREET, N.W.
WASHINGTON, D.C. 20006
202-842-8100

10 SOUTH MARKET SQUARE
HARRISBURG, PA 17108
717-232-1158

400 RENAISSANCE CENTER
DETROIT, MI 48243
313-259-7110

WRITER'S DIRECT DIAL NUMBER

3000 TWO LOGAN SQUARE
18TH AND ARCH STREETS
PHILADELPHIA, PENNSYLVANIA 19103-2799
215-981-4000

TELECOPIER (215) 981-4750
TELEX 710-670-0777

600 SOUTH OLIVE STREET
LOS ANGELES, CA 90014
213-617-0480

840 HAMILTON STREET
ALLENTOWN, PA 18101
215-434-0434

888 CORPORATE WOODS DRIVE
WHITE PLAINS, NY 10604
914-694-6800

June 22, 1984

Stephen Mims, Esquire
General Counsel's Office
Federal Election Commission
1325 K Street, NW
Washington, DC 20463

Re: The National Right to Work Committee, et al. v. Mondale, et al., MUR 1704

Dear Mr. Mims:

This letter and the supporting exhibits constitute the response of the Pennsylvania At-Large Delegates for Mondale Committee ("PALC") to the factual allegations concerning it which have been made in the Complaint filed with the Federal Election Commission ("FEC") by complainants the National Right to Work Committee, et al. ("RTW") against Mr. Walter F. Mondale and his campaign committee (collectively "Mondale Campaign) and a long list of multi-candidate committees associated with various national unions (collectively "Union PAC's").

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To the extent the Complaint alleges that PALC was affiliated with the Mondale Campaign, such charges were exhaustively refuted by PALC in its May 25, 1984 submission in Americans with Hart, Inc. v. Mondale for President Committee, Inc., MUR 1667, which is attached hereto as Exhibit "A" and incorporated as though set forth in full herein. PALC does not address allegations in the Complaint that contributions by the Union PAC's to various Mondale committees somehow affiliate the Union PAC's with each other, as these charges are not aimed at PALC. Moreover, PALC has no relevant first-hand knowledge of the activities of the Mondale Campaign, Union PAC's, Mondale delegate committees in other states or Mondale district delegate committees in Pennsylvania. Therefore, PALC does not comment on the great bulk of the allegations made in the Complaint. PALC is responding solely to refute factual allegations regarding it made in the Complaint.

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Before discussing the Complaint itself, PALC is compelled to address the means used by RTW to gather its alleged "facts" regarding the operation of PALC. As best as can be determined, RTW elected to collect information through the surreptitious use of private investigators who infiltrated the operations of PALC and other Mondale committees under the false

pretense of being volunteers. Presumably, these investigators were paid and directed by RTW.

Aside from the ethical questions raised by this sort of skulduggery, the actions of RTW suggest that it committed several violations of the Federal Election Campaign Act. To the extent RTW paid its private investigators to perform volunteer work for PALC or other Mondale committees, RTW was making contributions in connection with the presidential election which are forbidden under 11 C.F.R. §114.2(a-b)(1983). Even if RTW were allowed to make contributions, to the extent that payments to its investigators with respect to time spent in any one Mondale committee exceeded the limits set in 11 C.F.R. §102.8-.9 (1983), these contributions must be reported, and RTW has withheld the information necessary to allow PALC to file any appropriate amended reports. Finally, to the extent payments by RTW to its investigators with respect to time spent in any one Mondale Committee exceed the limits established in 11 C.F.R. §110.1 (1983), such payments would be illegal. While PALC is currently considering filing a formal complaint with the FEC, it is noted that the Commission has inherent power to investigate RTW's activities under 11 C.F.R. §111.8 (1983).[1]

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1. To the extent that the activities of RTW's investigators (CONTINUED)

Turning now to the allegations of the Complaint, the fact that investigation by three private detectives sent into PALC's offices at various times during the week of the April 10 primary unearthed no more than what is contained in their affidavits demonstrates most eloquently that RTW's charges of affiliation are without foundation.

Moreover, RTW's affidavits are nothing but speculation[2] and hearsay -- largely inaccurate speculation and hearsay. That RTW's detectives were unable to ascertain such an obvious fact as PALC's address (1418 Walnut Street, not 1420 Walnut Street) says much about their credibility.

There is no significance that the Mondale Campaign in Pennsylvania was operated from a suite at the Bellevue Stratford Hotel while PALC was located in a storefront in an adjacent building. The Bellevue is one of the largest hotels in Philadelphia and presumably possesses the type of sophisticated capacity necessary to a presidential campaign. The storefront at

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implicate local laws, PALC has brought the matter to the attention of the district attorney.

2. The statements made in the affidavits are typically qualified by such subjective terms as "seemed" or "appeared."

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1418 Walnut Street has been used by many campaigns in the past and is considered one of the prime locations in Philadelphia for a campaign office. That they are located next to each other is pure coincidence.

The proximity of the Bellevue to PALC headquarters did make for some traffic back and forth, however. Since the Bellevue was so close, a number of PALC staff people stayed there as guests. Furthermore, the Bellevue was the nearest source of food, and its public restrooms were put to use during periods when the facilities at PALC headquarters were either nonfunctional or overtaxed. PALC has no idea what "papers" are being referred to in the hearsay statement made in the Brown Affidavit. It was, however, often necessary to take telephone messages to the Mondale campaign regarding calls which were mistakenly made to PALC. The Act does not forbid all contact between a presidential campaign and delegate committees, it only prohibits control of the latter by the former.

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The affidavits of RTW's investigators attach completely unwarranted significance to certain Mondale campaign pins in the shape of Pennsylvania. See Exhibit "B".[3] The pins were not

3. The pin is described incorrectly. The writing and the (CONTINUED)

produced or sold by PALC or by the Mondale Campaign, and were not an indication of official status. It is believed that they were sold to all comers for a price of no more than a couple of dollars, but that the supply had been exhausted before RTW's investigators arrived. Possession of this pin signified nothing other than that the person wearing the pin was fortunate enough to have acquired one.

The Complaint avers that certain unidentified persons in the PALC office were overheard mentioning "Mondale paychecks." PALC staff personnel received nothing with respect to their work in Pennsylvahia other than a per diem subsistance allowance paid by PALC. Thus, there was no such thing as a "Mondale paycheck" in Pennsylvania. Any explanation of this out-of-context phrase is pure speculation. One possibility is that someone on PALC's staff, in private conversation, used the shorthand "Mondale paycheck" to describe his or her per diem reimbursement from PALC. Such offhand reference is, of course, completely without legal significance.

Attached to the Complaint are copies of various pieces of literature which RTW's investigators took from PALC

boundaries of the Commonwealth are rendered in blue, not black. The background is a gold color.

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headquarters. Most of this literature explicitly indicates that it was paid for by PALC. PALC fails to see any significance in the fact that PALC literature was available in PALC headquarters. There is also a piece which originated with the Second Congressional District Delegates for Mondale. The presence of this piece is due to the simple fact that PALC headquarters was physically located in the Second Congressional District. The affidavits make it clear that, when volunteers were dispatched to pass out campaign literature, they used only material printed by PALC and, possibly, literature from the relevant Mondale congressional district committee.

Also attached are a variety of pieces of literature which were paid for by the Mondale campaign or by Mondale delegate committees in other states. Whenever PALC received such material, it was placed in a storage area behind PALC's office becuase it was of no use. No material of this kind was available to the public, therefore, RTW's investigators could only have acquired it by theft while trespassing in a non-public area of PALC headquarters. Since non-Pennsylvania campaign material was never used by PALC, it is irrelevant.

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It is also claimed that literature from AFL-CIO COPE was found in PALC's office. While it is unknown whether this allegation is correct, the presence of literature from one organization in the office of another has never been held to be an affiliating factor under the Federal Election Campaign Act, at least not in a situation such as this, where it is clear that PALC was not dependent on any other source for campaign material. Moreover, should the Act be construed in such a fashion, it would infringe on the constitutionally protected rights of free speech and association.

The Complaint also questions certain contributions to PALC by the Ironworkers' PAC. RTW asserts that the checks were drawn on March 28. Since the reporting period for PALC's first quarter report (due on April 15) closed March 31, these checks were obviously not received by PALC during the relevant period. All contributions received by PALC from any source have been or will be reported.

The affidavits mention a number of specific individuals. Kathy Russell served as office manager for PALC and was responsible for opening and closing the office. Allegations that she or anyone else coordinated activities with the Mondale

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campaign are false. Jennifer Collins was a volunteer who came to Pennsylvania for the last few days of the campaign, and she was never on PALC's staff. She left immediately after the election and may well live in Washington. There was no one named "Wanda" on PALC's staff, however, a Wanda Williams did work for the Second District delegates and was occasionally in the office. There was an "Ann Lewis" associated with the Thirteenth District delegates; however, she does not match the description given. She certainly had no responsibility for making payments on behalf of PALC. The identities of "Boss Al", Doris Lassons", and "Bill" are complete mysteries. For all PALC knows they could have been other RTW spies.

As the above analysis demonstrates, RTW's affidavits fail to disclose anything which plausibly suggests that PALC either violated federal election law or was affiated with any other organization. Since no such violations or affilations ever existed, this failure is completely understandable. The Complaint itself is merely a futile attempt to supply by innuendo what RTW lacks in factual support. The Commission should find

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that no reason exists to believe that PALC has violated the Federal Election Campaign Act.

Respectfully submitted,

PETER HEARN
JAMES M. BECK
Pepper, Hamilton & Scheetz
2001 The Fidelity Building
123 South Broad Street
Philadelphia, PA 19103
(215) 893-3000

Attorneys for JOANNE CIULLA, TREASURER, PENNSYLVANIA DELEGATES AT-LARGE FOR MONDALE

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PEPPER, HAMILTON & SCHEETZ
ATTORNEYS AT LAW
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DEX (AGP3) 215-946-2477 · TWX 710-670-0777

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606 SOUTH OLIVE STREET
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213-617-0161

512 HAMILTON STREET
ALLENTOWN, PA 18101
215-434-6104

SIX CORPORATE PARK DRIVE
WHITE PLAINS, NY 10604
914-694-6866

May 25, 1984

Stephen Mims
General Counsel's Office
Federal Election Commission
1325 K Street, NW
Washington, DC 20463

Re: Americans with Hart, Inc. v. Mondale for President Committee, Inc., MUR 1667

Dear Mr. Mims:

This letter and supporting exhibits constitute the response of the Pennsylvania At-Large Delegates for Mondale Committee ("PALC") to the allegations concerning it,[1] which have been made in the amended complaint filed with the Federal Election Commission ("FEC") by complainant Americans with Hart, Inc. ("Hart") against respondent Mondale for President Committee, Inc. ("MPC" or "Mondale campaign").

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1. PALC has no firsthand knowledge of the activities of the Mondale for President Committee, Inc., Mondale delegate committees in other states, or Mondale district delegate committees in Pennsylvania, except insofar as the activities of these other committees brought them into contact with PALC. Therefore, PALC cannot comment on the great bulk of the allegations made in the Hart complaint.

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EXHIBIT "A"

PALC will not attempt a detailed analysis of pertinent provisions of federal election law or federal regulations. Such analysis is not necessary at this time, and may well prove to be redundant. In this submission PALC is responding to specific charges that certain of its actions were either illegal or created an affiliation between PALC and MPC.

Before turning to these charges, a description of the legal and political climate in which PALC operated is necessary. The salient feature of Pennsylvania's primary system is the direct election of delegates. Except in the secondary sense that someone who votes for a presidential candidate is more likely to vote for his or her pledged delegates, there is no connection between the success of a presidential candidate and the success of his or her delegates.[2] Thus no Mondale delegate candidate in Pennsylvania could expect to get elected by passively relying on the appeal of Walter Mondale. Under this dual system, many of the delegate candidates would have organized something in the nature of delegate committees without any encouragement from the Mondale campaign.

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2. For instance, in the First Congressional District, Mondale won the non-binding "beauty contest" while seven of his nine delegate candidates simultaneously went down to defeat. See Exhibit "A".

The 1984 procedure for the election of delegates is a departure from past Pennsylvania practice. In 1980, delegates were apportioned in rough accordance with the popular vote received by the candidates in each congressional district. It is true that the Mondale campaign "encouraged" the formation of delegate committees in Pennsylvania in the sense that it provided information describing the legal and practical aspects of such committees. See Exhibits "B" and "C". Since many delegate candidates were unaware of the new Pennsylvania delegate selection procedures, the Mondale campaign undertook to inform its delegate candidates of the necessity to run their own campaigns and to do so effectively. This action by the Mondale campaign promoted compliance with FEC regulations, as well, since most delegate candidates did not know that federal election law was applicable.

At-large delegate candidates occupy an unusual position in the Pennsylvania scheme. Thirty-nine members of the Pennsylvania delegation to the Democratic Convention will be at-large delegates, but such delegates are not chosen directly by the electorate. There were no at-large delegates on the ballot

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in the Pennsylvania primary.[3] At large delegates are chosen at a party caucus, and are apportioned among presidential candidates according to the number of popularly elected district delegates pledged to each candidate. To maximize the number of Mondale at-large delegates, which was the purpose of PALC, it was necessary to maximize the election of district delegates pledged to Mondale.

The nature of delegate selection in Pennsylvania must be kept in mind in considering the accusations made by Hart regarding PALC.

I. Staffing

PALC was formed when several prominent Mondale supporters who figured to become at-large delegates were informed by the Mondale campaign that, because of the dual system of delegate selection in Pennsylvania, the Mondale campaign would be concentrating its limited resources exclusively on Mondale's own campaign in the state -- primarily on mass media and phone banks. The delegate candidates, both district and at-large, were essentially on their own. To the extent there was to be any

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3. Thus, to accord great prominence to at-large delegate candidates in literature published by PALC would have been counterproductive and confusing, since voters would not find their names on the ballot.

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grass roots campaign, such as literature, rallies, election paraphernalia, get-out-the-vote drives, etc., it was up to the delegates to organize and finance such activities.[4]

These prominent Mondale supporters were also informed that, in order to comply with federal law, any activity which they chose to take had to be organized and financed under the aegis of a delegate committee, which would be separate from and independent of the Mondale campaign itself. It is not known how many prominent Mondale supporters were thus contacted. Four such persons, Richard Caliguri, Mayor of Pittsburgh; Wilson Goode, Mayor of Philadelphia; Edward Rendell, District Attorney of Philadelphia; and Louis Tullio, Mayor of Erie, formed PALC on March 23, 1984. See Statement of Organization, attached as Exhibit "D." Mr. Rendell became chairman and Joanne Ciulla, who had previously served as treasurer in Mr. Rendell's re-election campaign, became treasurer.

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4. The implication that PALC was being "used" by MPC, Hart April 18 Submission at 3, is incorrect. Rather than "using" PALC to "take over entire sections" of the campaign, MPC in effect abdicated responsibility for grass roots efforts to the delegates. There was never a choice between a Mondale grass roots effort and a delegate grass roots effort. The choice was between a delegate grass roots effort and none at all. Moreover, from a legal standpoint, Hart's argument confirms that delegate committees in Pennsylvania were conducting precisely the types of activities envisioned in the FEC's regulations. See 11 C.F.R. §110.13(d).

The members of PALC intended that it would undertake a significant state-wide effort to encourage the election of Mondale delegates. Thus there was a need to find staff with experience in organizing delegate campaigns. Such campaigns were new to Pennsylvania, as direct election of delegates had not previously been the law of the Commonwealth. Since remuneration was to be limited to a per diem subsistance allowance, if that, another effective qualification was a commitment to Mondale and his delegates which would motivate the staff to work long hours for no pay.

It was also necessary to staff PALC quickly, since the Pennsylvania primary was on April 10, 1984. Given the temporary nature of the positions, the qualifications required, and the limited time and resources which could be devoted to recruitment, most if not all of the positions were filled by Mondale volunteers who became available as the primary process was completed in other states. The precise nature of the previous affiliation between members of PALC's staff and the Mondale campaign is not known. PALC does not believe that the previous employment, or lack of same, of its staff is relevant to this matter.

The criteria for affiliation are set forth in 11 C.F.R. §100.5(g)(2)(ii). Of the five factors listed in this section,

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prior work history could only be relevant to

> - the authority, power or ability of one committee [(MPC)] to hire, appoint, discipline, discharge, demote or remove or otherwise influence the decision of the officers or members of the other committee [(PALC)].

Id. Obviously MPC had no power at all over the members of PALC, since they are all well-known and significant elected officials in Pennsylvania. Ms. Ciulla, PALC's treasurer and only non-member officer, has no political connection to Mondale's campaign and her previous political involvement has been with Mr. Rendell.

Hart is attempting to create an aura of impropriety out of the mere presence of persons who previously worked for Mondale on PALC's staff. It is not surprising that PALC was staffed from the one known source of people with both the experience and the desire to undertake the work PALC had to perform after MPC abdicated responsibility for grass roots activity to Mondale delegate candidates. Hart cites no instance of any action by PALC which may be construed as being the result of impermissible influence by MPC.[5] The past employment history of PALC staff

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5. With respect to other states, Hart has attempted to show improper coordination by focusing on material printed by Mondale delegate committees. He has not done so with respect to Pennsylvania, with good reason. PALC designed all of its own literature and never merely put its name to any MPC material. (CONTINUED)

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members is not a sufficient basis for concluding that PALC was affiliated with MPC.

II. Contributions to PALC

On page five of Hart's April 27 Submission, Hart attacks two contributions totalling $2,500 received by PALC from different Mondale delegate committees in New Hampshire. These contributions are well under the legal limit of $5,000, and demonstrate nothing about the relationship between PALC and any other Mondale committee. PALC did not request that these contributions be made. Nor was PALC aware of the contribution history of the New Hampshire committees. The only contact between PALC and the New Hampshire committees regarding these contributions was well after the fact when PALC sought to collect the information required by the FEC's reporting requirements.

These contributions do not implicate the affiliation criteria of 11 C.F.R. §100.5(g)(2)(ii). PALC did not engage in a "similar pattern of contributions." Indeed, it has never contributed to any out-of-state Mondale delegate committee. Nor

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See Exhibit "E". With respect to the amount of space devoted to Mr. Mondale, the FEC has never imposed any restrictions as to the content of printed matter published by delegate committees. Moreover, as already noted, any force which Hart's argument regarding insufficient promotion of delegate candidacies may have in the abstract is totally lost when applied to PALC, since its delegate candidates did not appear on the ballot.

does the amount involved, a total of $2,500, constitute "a substantial portion" of PALC's funds. See PALC Report of Receipts and Disbursements (attached as Exhibit "F"). It is immediately obvious from the figures presented by Hart that $2,500 does not constitute "a substantial portion" of the funds of the New Hampshire committees.

Hart also makes a general attack on the acceptance by Mondale delgate committees of so-called "PAC money." See, e.g., April 27, Submission at 10. Hart's repeated reference to this so-called "issue" suggests that this action is being pursued for political rather than legal reasons, since receipt of "PAC money" is detrimental to Hart's legal position on the issue of affiliation. Acceptance of such contributions demonstrates that MPC's wishes were being ignored by the very delegate committees Hart claims that it controls.

PALC accepted contributions from political action committees knowing full well MPC's position. While MPC is a national campaign with national concerns, the outlook of PALC is limited to its function: to promote the election of the greatest possible number of Mondale at-large delegates from Pennsylvania. With respect to PALC, the great bulk of PAC contributions are those from labor union PACs. See Exhibit "F". Although Hart may feel otherwise, contributions from labor

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have been traditionally welcomed by most Pennsylvania Democrats.[6] Clearly, Hart's attempt to find fault with contributions received by PALC is more political than legal, and does not supply the basis for concluding that any violation of federal election law has been committed.

III. Contributions by PALC

Hart makes much of the fact that PALC contributed to several district delegate committees in Pennsylvania in late March. Hart April 27 Submission at 6. See Exhibit "F". These contributions are perfectly legal; Hart does not contend otherwise. Hart's argument that these contributions are evidence of "coordination" misapprehends the nature of PALC.

As previously described, at-large delegates are not on the ballot in Pennsylvania and are apportioned on the basis of pledged delegates elected at the district level. Thus, for PALC to augment the total of Mondale at-large delegates, it assisted the election of Mondale district delegates. Early on in the Pennsylvania campaign, PALC knew of the needs and capabilities of the district committees. MPC had nothing to do with PALC's

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6. That Mondale delegate committees in Pennsylvania would accept contributions from labor political action committees is particularly understandable here, since many of those seeking to become Mondale delegates are members of labor unions.

contributions to the district delegate committees. The contributions represent "seed money" given by PALC to district committees which PALC believed could use money effectively but had not yet been able to raise money themselves. PALC could not dictate how the district delegate committees spent the contributions. Hart has provided no reason to believe that these contributions are so significant as to constitute grounds for a finding of affiliation under 11 C.F.R. §100.5(g)(2)(ii).

IV. Per Diem Payments

Hart attacks payment of per diem subsistence payments to staff and other volunteers. April 27 Submission at 8. Hart appears to be arguing that such payments, which PALC admits to making (see Exhibit "F"), are inconsistent with "'volunteer activities,' since volunteer work is not paid employment." Id. Hart's definition of volunteer work is simplistic and is belied by the statutory history of the Federal Election Campaign Act. In a related context, Congress explained: "Payments . . . for travel and subsistence or customary token payments . . . to individuals do[] not, however, remove the individual from the volunteer category." H.R. Rep. No. 96-422, 96th Cong., 1st Sess. at 9 (1979) (reprinted in [1979] U.S. Code, Cong. & Ad. News at 2869) (discussing payments to volunteers by party organizations). PALC's payment of per diem subsistence

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allowances to members of its staff and to other volunteers does not constitute a violation of federal election law.

V. Conclusion

For the reasons set forth in this response, the Commission should find no reason to believe that PALC has violated the Federal Election Campaign Act.

Respectfully submitted,

PETER HEARN
JAMES M. BECK
Pepper, Hamilton & Scheetz
2001 The Fidelity Building
123 South Broad Street
Philadelphia, PA 19103
(215) 893-3000

Attorneys for JOANNE CIULLA, TREASURER, PENNSYLVANIA DELEGATES AT-LARGE FOR MONDALE

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Exhibit A

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1st C.I.

WARD	MONDALE	HART	JACKSON
1	2432	1905	411
2	1966	1514	1854
5	2214	2108	666
7	2510	1918	192
13	1512	323	5315
14	543	67	2235
15	1917	1453	1092
18	1261	1183	426
19	1336	358	1031
20	636	77	1820
25	2674	2133	312
26	2794	2434	492
27	1138	1577	1473
PART OF 30	418	110	1426
31	1406	1895	109
36	3411	1685	6753
37	1281	128	3355
39	4930	4088	806
PART OF 42	1667 ~~821~~	404 ~~413~~	2457 ~~2605~~
43	1829	443	2605
47	1079	51	1851
48	2041	1437	1299
49	1353	518	329
	42,848	27,839	41,27

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EXHIBIT "A"

	1	2	5	7	13	14	15	18	19	20	25	26	27	30	31	36	37	39	42	45	47	48	49	TOTALS
EDWARD HALIN	155	242	134	65	144	42	76	67	47	56	74	364	60	80	76	253	110	165	345	145	54	196	148	3912
EDELL KATZ	124	144	136	74	58	21	93	58	26	49	104	154	93	52	80	233	51	321	173	101	57	189	125	2522
BASIL GATTO	166	161	112	66	74	25	64	51	40	35	76	311	28	48	64	243	30	534	125	61	33	256	82	3151
MADELINE SHLEBY	114	247	934	73	108	28	153	115	33	47	109	91	534	112	71	213	45	377	234	51	63	70	102	4640
LOUISE CIOTTU	111	154	108	63	57	31	72	44	40	26	90	324	47	37	68	225	77	415	140	32	53	241	103	2755
RITA RUFO	215	167	137	65	78	80	56	81	43	44	115	353	56	57	74	303	96	477	143	75	66	644	137	3814
MARTIN MADDALONI M	665	711	1425	627	401	114	773	257	128	436	1190	2447	705	176	644	2436	144	1325	634	200	451	739	566	17826
HENRY REDDY J	187	947	616	91	3702	1165	635	125	232	963	151	225	1237	575	76	3342	1238	467	150	477	162	364	2465	20378
HENRY NICHOLAS M	569	792	1631	259	639	134	798	260	122	221	407	1445	864	159	526	1653	316	1637	598	345	549	491	621	14180
JAMES RATNER	116	175	247	62	95	33	57	26	16	30	68	148	64	71	61	242	45	263	152	56	23	124	122	2350
LYDIA VELEZ J	209	954	688	110	2375	1148	607	466	287	970	127	785	1218	840	57	3211	1147	423	151	576	605	531	342	19665
BASIL MERENDA JR.	96	130	73	50	232	59	83	58	76	88	68	208	76	31	53	153	157	324	145	146	70	1158	221	3828
SHIRLEY GREGORY M	127	220	192	85	322	142	145	140	82	125	108	451	224	78	393	491	215	219	257	234	117	241	1445	6008
LAURA RICHLIN	64	153	213	66	204	81	135	63	75	73	72	66	149	41	51	115	129	156	115	136	111	74	205	2540
MARY GOLDMAN M	517	655	1634	289	645	173	766	385	176	165	342	951	1034	150	552	722	221	1130	665	451	327	459	651	13540
FRANCOISE AKAREB	446	795	1661	232	932	151	377	317	123	77	526	668	1454	154	965	563	204	1233	566	276	521	446	475	12616
WILBUR LOCKETT J	171	870	641	90	2159	1154	67	251	263	936	141	178	1140	765	65	3306	1134	313	155	492	648	731	2553	20140
SARAH KERR	65	148	314	52	195	79	131	65	73	106	109	87	132	35	68	112	117	135	116	135	134	111	197	2715
ANDREA D PISCIOTTA	53	121	170	35	160	75	144	66	51	102	60	67	150	18	62	95	133	127	116	125	136	51	159	2295
MARC GALLO	100	155	147	64	156	61	127	65	71	72	105	239	85	31	63	131	122	349	141	124	99	103	136	2739
JOSHUA NEIMAN	57	58	78	25	58	29	65	29	28	46	81	44	65	17	35	68	34	101	62	31	41	41	93	1263
ROBERT SPELL	66	110	134	44	75	24	53	40	37	53	111	72	107	41	27	163	115	147	71	45	31	101	66	1469
FRANCES CAPETOLA M	550	716	1458	581	724	244	625	297	162	174	1228	1167	964	207	548	1438	342	1445	1231	547	494	1551	1261	17900
FRANCES HAIRSTON J	160	783	578	122	2082	578	617	157	233	966	131	1561	1004	712	111	3020	1401	376	216	731	511	741	2246	13685
JAMES BARRETT	41	57	77	41	112	42	11	73	52	54	134	104	71	18	91	445	74	165	135	114	61	104	132	2534
ROBERT HERZ	42	149	144	85	169	76	146	61	48	56	168	554	218	136	46	135	128	76	156	131	75	63	176	2454

1st C.D. & 1st J.

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	1	2	5	7	13	14	15	18	19	20	25	26	27	30	31	36	37	39	42	45	47	48	49	TOTALS	
BARBARA RHODES	167	649	407	13	319	796	341	190	137	561	213	255	892	536	130	1945	765	363	324	445	34	563	1311	14	887
PETER MURSING	42	61	48	61	65	31	97	60	18	99	52	52	47	30	67	81	68	101	114	75	73	36	79	1	513
PATSY SMITH	428	595	406	326	537	136	754	255	118	166	430	582	719	94	267	447	238	832	677	414	469	348	630	10	830
ERIC WEINSTEIN	401	714	165	397	266	63	942	304	89	96	598	359	1594	77	403	319	121	1112	762	247	87	319	416	11	715
ESTELLE MONROE	52	71	101	79	121	38	129	68	55	53	115	97	97	14	91	328	59	118	222	111	65	80	165	2	352
JANE POLLOCK	352	628	1624	341	209	48	893	216	61	51	574	566	1533	51	372	284	56	1138	943	181	52	320	326	10	916
GARY FRIEDMAN	49	91	154	62	137	69	145	30	30	47	104	72	126	31	61	139	93	193	218	74	49	42	189	2	152
JANET PINA J	165	816	563	101	244	263	636	125	211	944	119	234	1177	680	60	2010	1235	371	127	828	659	746	1259	18	6.51
PATRICIA HUGHES H	376	644	1503	1058	518	133	545	367	186	190	446	873	806	141	583	732	229	1185	1223	419	456	425	585	13	646
PETER LEE	380	681	1577	381	323	40	866	257	74	53	541	564	1446	77	347	358	68	1109	818	169	66	334	352	10	806
DANA JACOBE J	137	758	552	78	2454	1068	548	120	208	1011	107	159	1227	783	57	3013	1193	342	123	803	614	741	2257	18	357
ELIZABETH CARLTON	366	616	1565	329	153	26	844	288	66	63	544	505	1403	49	374	254	22	1055	836	149	40	262	292	10	061
EDWARD WILLIAMS	37	46	84	56	96	57	57	36	29	20	66	55	71	30	50	83	61	105	117	46	50	35	102	1	387
MARTINE ZUIDMANS	19	110	96	64	97	20	85	39	27	44	37	25	94	31	43	92	42	97	43	62	79	34	81	1	371
MARIE LEDERER H	407	602	1344	654	436	103	799	742	144	155	1367	892	690	117	670	694	181	998	954	385	411	583	476	13	779
ANDREW MACKENZIE	384	633	1624	334	141	24	806	261	44	44	540	531	1377	45	353	283	28	968	775	141	47	301	278	9	962
WENDY C. BEAR	44	46	38	43	38	11	82	28	16	14	21	24	48	44	34	169	26	38	45	27	20	29	42		927
DAVID C. HENRY J	129	799	505	69	2415	1142	558	123	185	948	108	136	1282	792	44	2958	1155	329	91	822	602	751	2303	18	306
MARGARET SCHERNECKE	64	188	36	44	72	22	52	32	27	42	34	22	43	25	28	105	38	142	68	54	53	59	85	1	355
HOWARD WEINER	374	619	1546	345	147	23	853	255	44	46	486	459	1494	39	335	236	21	949	836	123	30	372	263	9	796
BELINDA LAI	392	601	1377	303	144	23	846	296	41	35	457	445	1936	39	336	242	19	838	898	125	52	247	280	9	902
NORMAN LAUDERDALE H	1394	585	1870	329	347	98	780	390	102	112	1533	538	638	97	498	686	85	1551	907	331	335	330	465	14	827
DANIEL SULLIVAN	1128	198	82	412	192	18	91	135	22	37	1065	323	188	62	394	1028	26	1738	584	79	79	152	19	8	169
ANDREA HALL	78	507	219	53	391	644	890	76	89	540	139	97	848	540	47	1927	648	184	149	336	332	488	1025	10	804
ERICK BROWN	45	16	29	52	21	6	27	24	19	27	47	25	16	5	24	48	5	74	59	8	22	42	28		674
FLORENCE LOSCO	571	145	82	95	47	7	46	38	17	17	64	110	60	8	37	62	13	538	140	37	34	103	57	2	226
JONATHAN NARINS	11	9	29	28	15	6	17	17	18	9	17	28	22	6	52	26	4	18	37	4	15	19	19		424
CECILE PEREZ M	378	441	1149	579	231	166	723	305	158	111	1210	1435	514	89	1576	412	151	1521	541	365	129	1341	447	9	797

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EXHIBIT B

Mondale for President
2301 Wisconsin Avenue, N.W.
Washington, D.C. 20007
Telephone: 202-625-1980

MONDALE

TO: MONDALE DELEGATES

FROM: ELAINE KAMARCK

DATE: JANUARY 12, 1984

RE: CONDUCTING YOUR CAMPAIGN FOR DELEGATE TO THE NATIONAL CONVENTION

Under the federal election laws, persons seeking election as delegates or alternates to the National Convention can form committees which are allowed to raise and expend money to support their candidacies. Care must be taken to assure that the enclosed legal guidelines are followed. This program can be of enormous benefit in assuring your election as a delegate. Following is a brief outline on how these committees should work.

I. Forming the Committee

Immediately upon being slated as a Mondale delegate, the campaign will assist each slate of delegates in forming a committee if they so desire. A memorandum explaining the legal procedures for forming a committee and registering and reporting to the FEC accompany this memo.

II. Raising Money

As soon as possible, the delegate committees should develop a fundraising plan which contains the following components:

1. Plan one or more grass roots fundraisers in your Congressional District

2. Solicit other Mondale supporters in your district for contributions to the Committee. (IMPORTANT NOTE: A person who has contributed the maximum amount to the Mondale campaign is allowed to make a contribution of up to $5,000 per person to each Mondale delegate committee subject only to the annual $25,000 limit per individual on contributions to all federal candidates.)

3. Solicit local organizations to which you may belong for contributions. (IMPORTANT NOTE: Contributions by corporations, labor unions, foreign nationals and federal contractors are not permitted. But

EXHIBIT "B"

Paid for by Mondale for President, Inc.

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Mondale for President
2301 Wisconsin Avenue, N.W.
Washington, D.C. 20007
Telephone: 202-625-1984

MONDALE

contributions from Political Action Committees of issue groups or labor unions are permitted. Individuals and Political Action Committees can contribute up to five thousand dollars to a delegate committee. Walter Mondale has made a decision not to accept money from P.A.C.'s for his campaign. Each delegate committee may make their own decision regarding P.A.C. money.)

III. Spending Money

The money raised by Delegate Committees must be spent in the district on the conduct of a grassroots campaign. Under no circumstances can money be spent for general public advertising such as T.V., radio, newspaper ads, billboards or direct mail.

Money can be spent for campaign materials to be used by volunteers such as bumper stickers, handbills, brochures, posters and yard signs which advocate the selection of a group of delegates. These materials may include information about the Mondale candidacy as well as information about the delegate candidates. There are no requirements as to the the amount of space which must be devoted to the delegate-candidates versus the amount of space devoted to Mondale, provided the purpose and message are directed towards the selection of the delegate candidates.

Before spending any money:

- Design your campaign materials.
- Arrange for a volunteer group to distribute materials.
- Plan a "Get Out the Vote" program using volunteers. (IMPORTANT NOTE: Delegate Committees can reimburse volunteers for their expenses.)

IV. Reporting

You will have to file quarterly reports with the Federal Election Commission. Therefore be sure to:

- Keep careful records of all receipts and expenditures.
- Write checks whenever possible for all expenditures so that record keeping is easier.
- Please follow the instructions on the enclosed memorandum and when in doubt do not hesitate to call the Office of the Legal Counsel here at the campaign headquarters.

Paid for by Mondale for President, Inc.

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EXHIBIT C

MEMORANDUM

January 6, 1984

RE: Delegate Expenditure Committees

FROM: David Ifshin
Lyn Oliphant

FORMING A DELEGATE COMMITTEE

Under federal election law, if a group of delegates plans to raise or spend in excess of $1000 on behalf of the delegate slate, it must form a delegate committee. This committee must file two types of forms containing routine information with the Federal Election Commission: a Statement of Organization (Form 1) and a Report of Receipts and Expenditures (Form 3X). Copies of these forms are attached. Additional forms may be obtained from the legal office at the national headquarters.

The first step for a delegate committee is to designate a treasurer and to open a separate committee bank account.

Within 10 days of the time when your delegate committee raises contributions totalling in excess of $1000 or spends more than $1000, the treasurer must file a Statement of Organization with the FEC (Form 1).

HOW TO FILL OUT A STATEMENT OF ORGANIZATION

A Statement of Organization is a simple form designed to provide the FEC with basic information about political committees. Complete instructions are on the back of the form. In order to prepare a Statement for a delegate committee, the following should be kept in mind.

Line 1: Your committee's name is inserted on line 1. Under the

EXHIBIT "C"

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law, the name of your committee must include the word "delegate(s)," and may include the name of the presidential candidate which it supports. For example, "XYZ Delegate Committee" or "XYZ Delegates for Mondale."

Line 2: This line requests the date when your group became a political committee. The date may be anytime prior to 10 days before the committee receives or expends its first $1000.

Line 3: If your committee is registering for the first time, you need not fill in this blank.

Line 4: If your committee is registering for the first time, you should check "NO."

Line 5: Delegate committees should check "(c)" and fill in the name of Walter F. Mondale.

Line 6: Fill in "NONE."

Line 7: This line requests the name of the person who will keep the records and books of your committee. If this is the treasurer, you may simply fill in "Treasurer."

Line 8: This line requests the name and address of the treasurer and assistant treasurer, if any. Your committee must have a treasurer, but need not have an assistant treasurer. The treasurer and assistant treasurer may, but are not required to be, candidates for delegate.

Line 9: Your committee funds must be kept in a separate checking account which contains only committee funds. This line requests the name and address of the bank in which the committee has its account. If for any reason a second account is needed or the funds are to be kept anywhere other than a bank, please consult with your state coordinator. Under the law, each committee makes

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all its disbursements by check drawn on the committee's account, except for expenditures of less than $100 made from a petty cash fund. If a petty cash fund is established, records must be kept of all disbursements from it.

Once the Statement of Organization has been completed, the treasurer must sign and date it. It should then be sent to the Federal Election Commission, 1325 K Street, N.W., Washington, D.C. 20463. A copy must also be filed with the Secretary of State in your state. Any changes in the information reported on the Form must be reported to the FEC in writing within 10 days of the date of the change. Please send a copy of the Statement of Organization and all other filings of the committee with the FEC to the national headquarters, attention General Counsel's office.

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REPORTING REQUIREMENTS FOR RECEIPTS AND DISBURSEMENTS (Form 3X)

The Report of Receipts and Disbursements is a means of providing public disclosure of the financial activity of political committees. Complete instructions for periodic reporting of your financial activity are contained on the attached Report of Receipts and Disbursements (Form 3X). When completed, these reports should be forwarded to the Federal Election Commission, 1325 K Street, N.W., Washington, D.C. 20463. (A copy of the portion of the report applicable to activity in connection with a candidate's election in a state must also be filed with the Secretary of State in that state.) Please send a copy of all reports to the national headquarters, attention General Counsel's Office.

I. Quarterly Reports

Under the law, delegate committees must file quarterly Reports of Receipts and Disbursements (Form 3X) no later than April 15, July 15, October 15, and January 31 of next year. Each report must itemize the funds the committee has raised and expended during the period since the filing of the previous report.

II. Pre-election Reports

In addition to the quarterly reports, a preelection report is filed no later than the 12th day before a primary election in connection with which your committee makes contributions or expenditures. Such reports must include all transactions from the closing date of the last quarterly report filed, through the 20th day before the election. The Commission publishes lists of filing dates which are forwarded to all registered committees.

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That information will also be available through the legal office at the national headquarters.

III. Contents of Reports - Receipts

The FEC forms divide receipts into eight categories for the purpose of reporting. These are:

Contributions from Individuals/Persons
Contributions from Political Committees
Transfers from Affiliated Committees
Loans Received
Loan Repayments Received
Offsets to Operating Expenditures
Contribution Refunds Received from Candidates and Committees
Other Receipts

Total receipts in these categories are reported on the Detailed Summary Page.

In addition, certain receipts are itemized on a separate Schedule A, (e.g. contributions from individuals/persons in excess of $200 or aggregating in excess of $200 during a calendar year). The instructions for Form 3X indicate those receipts which must be itemized on Schedule A. A separate Schedule A must be used for each category of receipt.

IV. Contents of Reports - Disbursements

Similarly, the FEC forms divide disbursements into eight categories for the purpose of reporting. These are:

Operating Expenditures
Transfers to Affiliated Committees
Contributions to Federal Candidates and Political Committees
Independent Expenditures
Loan Repayments Made
Loans Made
Contribution Refunds Made
Other Disbursements

Total disbursements in these categories are reported on the

In addition, some disbursements must be itemized on a separate Schedule B. Three categories (operating expenditures, independent expenditures, and other disbursements) must be itemized on Schedule B only if they exceed $200 or when added to other disbursements made to the same person, aggregate over $200 during a calendar year. Disbursements under the other categories must be itemized on Schedule B regardless of amount. A separate Schedule B must be used for each category of disbursement.

V. Additional Schedules for Receipts and Expenditures

Certain kinds of receipts and expenditures must also be listed on specific schedules in addition to the general Schedules A and B. These are: loans owed by and to the committee (Schedule C); other debts and obligations (Schedule D); and independent expenditures (Schedule E).

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RECORDKEEPING REQUIREMENTS

Federal election law requires your committee to keep records of all receipts and disbursements. The treasurer has the responsibility to exercise best efforts to obtain and maintain these records.

There is no specific recordkeeping or accounting system required by the law. However, it is recommended that a committee keep a separate account for each of the various categories of receipts and disbursements on the Detailed Summary Page. This will assist you in filling out the Detailed Summary Page as well as Schedules A-E, as necessary.

For contributions received in the form of a check, it is recommended that photocopies of the checks be made and kept by

the committee's treasurer.

All disbursements must be made by check or similar draft from a committee depository, except petty cash expenditures of $100 or less. A written journal of disbursements from petty cash must be maintained.

The Committee treasurer must preserve all records for 3 years after the filing date of the report corresponding to the records.

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Exhibit D

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STATEMENT OF ORGANIZATION

(see reverse side for instructions)

1. (a) Name of Committee (in Full) ☐ Check if name or address is changed.
Delegates At-Large for Mondale

2. Date
March 23, 1984

(b) Address (Number and Street)
1416 Walnut St

3. FEC Identification Number

(c) City, State and ZIP Code
Phila. Phila PA 19105

4. Is this an amended Statement? ☐ YES ☒ NO

5. TYPE OF COMMITTEE (check one):

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

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

Name of Candidate	Candidate Party Affiliation	Office Sought	State/District

☒ (c) This committee supports/opposes only one candidate Delegates for Mondale (name of candidate) and is NOT an authorized committee.

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

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

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

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

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

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

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

Full Name	Mailing Address and ZIP Code	Title or Position
Joanne B Ciulla	717 Pine St Phila PA 19106	Treasurer

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

Full Name	Mailing Address and ZIP Code	Title or Position
Joanne B Ciulla	Treasurer	(215) 925-7667

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

Name of Bank, Depository, etc.	Mailing Address and ZIP Code
Continental Bank	Center Square 1500 Market St Phila PA 19102

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

Joanne B Ciulla — Joanne B Ciulla — _____

Type or Print Name of Treasurer — SIGNATURE OF TREASURER — Date

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

For further information contact: Federal Election Commission, Toll Free 800-424-9530, Local 202-523-4068

FEC FORM 1 (3/80)

EXHIBIT "D"

Exhibit E

8504050057

8 5 0 4 0 5 0 0 5 0 9

INVOICE/STATEMENT

publiSET, Inc.
250 W. GIRARD AVE. PHILA., PA. 19123
(215) 925-7827

DATE
4-10-84

Dianne Thompson
Mondale Pennsylvania at Large
Delegate Committee
1418 Walnut Street
Philadelphia, Pa. 19102

PLEASE DETACH AND RETURN WITH YOUR REMITTANCE

$ _____

DATE	ISSUE NO.	CHARGES AND CREDITS	AMOUNT
4-5-84		Consulting, redesign and mechnical creation	1,424.00
		Printing 300,000 13" newsprint tabs	7,000.00
			8,424.00
		Paid Ch #1017 4-5-84	5,000.00
		Paid balance 4-6-84	3,484.00
			-0-

2 Ck's 5000.00 3,484.00

CURRENT	PAST DUE	PAST DUE	PAST DUE

A FINANCE CHARGE OF 1½ PERCENT IS APPLIED TO ANY PORTION OF THE NEW BALANCE OVER 30 DAYS. MINIMUM DATE SHALL MINIMUM CHARGE IS 75 CENTS. BILLS ARE DUE AND PAYABLE ON THE DATE OF THE NEWSPAPER IN WHICH THE AD APPEARED

A
PAY LAST AMOUNT IN THIS COLUMN

CUSTOMER COPY – PLEASE KEEP FOR YOUR RECORDS

EXHIBIT "E"

Custom Graphics

1813 Ranstead Street Philadelphia, PA 19103 56[illegible] 0114

Providing quality photocomposing via telecommunication with compu[illegible] and word processing systems, as well as serving all of your photocomposing [illegible]eds. Processes — from 25% to 300%. Fast pick-up and delivery — fast turn[illegible]und.

Mondale Delegate Selection Committee
1418 Walnut Street
Philadelphia, PA 19102

Re: Mr. John Bell

INVOICE #	360
CG JOB #	MD/314
DATE	April 04, 1984
YOUR P.O. #	Mondale
YOUR JOB #	for President
CLIENT	

DESCRIPTION	AMOUNT
Typography & stats for, design & Layout, for production of 4 sided tabloid, with inserts and 5 artist rendings	
ISRAEL & THE MIDDLE EAST	
SENIOR CITIZENS	
THREE MILE ISLAND	
JOBS & THE ECONOMY.	$1,800.00
SUBTOTAL	$1,800.00
TAX	
AMOUNT DUE	$1,800.00

TERMS DUE UPON RECEIPT

8504050509

Custom Graphics

1813 Ranstead Street Philadelphia, PA 19103 568-0114

Providing quality photocypesetting via telecommunicat... with computers and word processing systems, as well as serving all of your ph...ocypesetting needs. Photostats – from 25% to 300%. Fast pick-up and deliv..., – fast turnaround.

INVOICE #	400
CG JOB #	MD/345
DATE	April 06, 1984
YOUR PO.#	Mondale for
YOUR JOB #	President
CLIENT	Flyers

Mondale Delegate Selection Committee
1418 Walnut Street
Philddelphia, PA 19202

Re: John Bell

DESCRIPTION	AMOUNT
Typography, Stats, design, layout, type spec composition of flyers	
MONDALE HA PROBADO SER UN AMIGO DE LOS HOSPANOS	$150.00
SUBTOTAL	$150.00
TAX	
AMOUNT DUE	$150.00

Check
10-12
4-13-84

TERMS DUE UPON RECEIPT

8504050510

8504050051 1

Exhibit F

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

(Summary Page)

ALIGN AREA | | ALIGN AREA

1. Name of Committee (In Full)

PENNSYLVANIA AT-LARGE DELEGATES FOR MONDALE

Address (Number and Street)

C/O JOANNE CIULLA
717 PINE ST.

City, State and ZIP Code

PHILADELPHIA, PA 19106

☐ Check here if address is different than previously reported.

2. FEC Identification Number

C 00183679

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

4. TYPE OF REPORT (Check appropriate boxes)

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

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

SUMMARY

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period JAN 1, 1984 through MARCH 31, 1984		
6. (a) Cash on hand January 1, 19 84		$ 00.00
(b) Cash on Hand at Beginning of Reporting Period	$ 00.00	
(c) Total Receipts (from Line 18)	$ 22,500.00	$ 22,500.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ 22,500.00	$ 22,500.00
7. Total Disbursements (from Line 28)	$ 16,619.85	$ 16,619.85
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 5,880.15	$ 5,880.15
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)	$ —	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	$ —	

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

Joanne B. Ciulla
Type or Print Name of Treasurer

Joanne B. Ciulla
SIGNATURE OF TREASURER

April 13, 1984
Date

For further information contact:
Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4068

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

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

FEC FORM 3X (3/80)

EXHIBIT "F"

85040500512

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

Name of Committee (In Full): PA. AT LARGE DELEGATES FOR MONDALE

Report Covering the Period: From: JAN 1 84 To: DEC 31 1984

	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date	
I. RECEIPTS			
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees.	$0.00	$0.00	11(a)
(Memo Entry Unitemized $)			
(b) Political Party Committees			11(b)
(c) Other Political Committees.	$25.00	$25.00	11(c)
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c))	$25.00	$25.00	11(d)
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES.	$0.00	$0.00	12
13. ALL LOANS RECEIVED	$0.00	$0.00	13
14. LOAN REPAYMENTS RECEIVED.	$0.00	$0.00	14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	$0.00	$0.00	15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	$0.00	$0.00	16
17. OTHER RECEIPTS (Dividends, Interest, etc.)	$0.00	$0.00	17
18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)	$25.00	$25.00	18
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES.	$14,119.25	$14,119.25	19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES			20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	$2,500.00	$2,500.00	21
22. INDEPENDENT EXPENDITURES (use Schedule E)			22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES. (2 U.S.C. §441 a(d)) (Use Schedule F)			23
24. LOAN REPAYMENTS MADE.			24
25. LOANS MADE			25
26. REFUNDS OF CONTRIBUTIONS TO			
(a) Individuals/Persons Other Than Political Committees.			26(a)
(b) Political Party Committees			26(b)
(c) Other Political Committees.			26(c)
(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))			26(d)
27. OTHER DISBURSEMENTS			27
28. TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27).	$16,619.25	$16,619.25	28
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)	$25.00	$25.00	29
30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)	—		30
31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)	$25.00	$25.00	31
32. TOTAL OPERATING EXPENDITURES from Line 19	14,119.25	14,119.25	32
33. OFFSETS TO OPERATING EXPENDITURES from Line 15	—	—	33
34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)	14,119.25	14,119.25	34

85040500513

Page 1 of 2 pages
LINE NUMBER 11c
(Use separate schedule(s) for each category of the Detailed Summary Page)

SCHEDULE A — ITEMIZED RECEIPTS

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

Name of Committee (In Full)
FR. AT-LARGE DELEGATES FOR MONDALE

	Name of Employer / Occupation	Date (month, day, year)	Amount of Each Receipt this Period
A. Full Name, Mailing Address and ZIP Code FAC BRICKLAYERS + ALLIED CRAFTSMAN 815 FIFTEENTH ST. N.W. WASH. D.C. 20005 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—$ 2,000	3/22/84	2,000.00
B. Full Name, Mailing Address and ZIP Code AMERICAN FEDERATION OF TEACHERS 11 DUPONT CIRCLE N.W. WASH. D.C. 20036 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—$ 5,000.	3/22/84	5,000.00
C. Full Name, Mailing Address and ZIP Code NEW HAMPSHIRE 2ND DIST DELEGATES FOR MONDALE 4 NEIL DR. ALLENTOWN, N.H. Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—$ 1,500	3/22/84	1,500.00
D. Full Name, Mailing Address and ZIP Code NEW HAMPSHIRE 1ST DIST. DELEGATES FOR MONDALE 5 HAYDES DR. MERIMAK, N.H. Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—$ 1,000	3/22/84	1,000.00
E. Full Name, Mailing Address and ZIP Code SEIU COMMITTEE ON POLITICAL EDUCATION SERVICE EMPLOYEES INT'L UNION, AFL-CIO 2020 K ST N.W. WASH D.C. 20006 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—$ 4,000	3/26/84	14,613.00
F. Full Name, Mailing Address and ZIP Code UNITED AUTO WORKERS INT'L UNION 8000 EAST JEFFERSON AVE. DETROIT, MICH 48214 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—$ 5,000	3/24/84	5,000.00
G. Full Name, Mailing Address and ZIP Code AMER. FED. OF STATE CO. + MUN. EMP. LEGISLATIVE/POLITICAL ACTION PRM 1625 L ST N.W. WASH D.C. 20036 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—$ 5,000	3/22/84	5,000.00
SUBTOTAL of Receipts This Page (optional)			22,550
TOTAL This Period (last page this line number only)			

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Page 2 of 2 for
LINE NUMBER 11c.
Also enter on each subsequent page of the Detailed Summary Page

SCHEDULE A **ITEMIZED RECEIPTS**

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

Name of Committee (In Full)
PA. AT-LARGE DELEGATES FOR MONDALE

A. Full Name, Mailing Address and ZIP Code CLOTHWORKERS WORKERS OF AMER. - C.O.P.E. 1925 K ST. N.W. WASH. D.C. 20006	Name of Employer Occupation Aggregate Year-to-Date—$ 5000	Date (month, day, year) 5/24/84	Amount of Each Receipt this Period $5,000.00
Receipt For: ■ Primary ☐ General ☐ Other (specify):			
B. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):			
C. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):			
D. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):			
E. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):			
F. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):			
G. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):			
SUBTOTAL of Receipts This Page (optional)			$5000.00
TOTAL This Period (last page this line number only)			$28,500.00

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SCHEDULE B — ITEMIZED DISBURSEMENTS

Page 1 of 3
LINE NUMBER 21b
(Use separate schedule(s) for each category of the Detailed Summary Page)

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

Name of Committee (In Full)

PA. AT-LARGE DELEGATES FOR MONDALE

	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Full Name, Mailing Address and ZIP Code BELL OF PENNSYLVANIA ONE PARKWAY PHIL., PA. 19102	TELEPHONE SERVICE Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	3/23/84	$1,600.00
B. Full Name, Mailing Address and ZIP Code GRAY COMMUNICATIONS 575 VIRGINIA DR. FORT WASH., PA. 19034	TELEPHONE EQUIP. Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	3/22/84	$2,761.60
C. Full Name, Mailing Address and ZIP Code BELLEVUE STRATFORD HOTEL BROAD & WALNUT ST. PHIL. PA 19102	STAFF LODGING Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	3/23/84	$109.60
D. Full Name, Mailing Address and ZIP Code RICHARD I. RUBIN & CO., INC 1760 MARKET ST. PHIL., PA 19103	RENT ON OFFICE Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	3/23/84	$500.00
E. Full Name, Mailing Address and ZIP Code DIANE THOMPSON 1418 WALNUT ST. PHIL., PA. 19102	PETTY CASH-OFC SUPPLIES Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	3/25/84	$100.00
F. Full Name, Mailing Address and ZIP Code U.S. AIR, INC. WASH. NAT'L AIRPORT WASH, D.C. 20001	STAFF TRAVEL Disbursement for: ☐ Primary ☐ General ☐ Other (specify): (PHL-PITT)	3/27/84	$124.60
G. Full Name, Mailing Address and ZIP Code BENJAMIN ASHER 54 WINDMERE RD. NEWTON, MA. 02166	PER DIEM Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	3/27/84	$201.60
H. Full Name, Mailing Address and ZIP Code BENJAMIN ASHER 54 WINDMERE RD. NEWTON, MA 02166	TRAVEL EXPENSES Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	3/27/84	$134.75
I. Full Name, Mailing Address and ZIP Code ALAN QUIRKLAN 1418 WALNUT ST. PHL. PA 19102	PER DIEM Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	3/27/84	$234.50
SUBTOTAL of Disbursements This Page (optional)			$5764.25
TOTAL This Period (last page this line number only)			

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SCHEDULE B **ITEMIZED DISBURSEMENTS**

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

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

Name of Committee (In Full)

PA. AT-LARGE DELEGATES FOR MONDALE

	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Full Name, Mailing Address and ZIP Code MARTIN DAVIS 3528 EISENBROWN Rd READING, PA	REIM. FOR MISC. EXPS Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	3/28/84	$121.90
B. Full Name, Mailing Address and ZIP Code CARRIE E. THOMPSON 1418 WALNUT ST. PHIL., PA. 19102	REIM FOR FREIGHT CHRGS Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	3/28/84	$189.20
C. Full Name, Mailing Address and ZIP Code DIANE THOMPSON 1418 WALNUT ST. PHIL., PA 19102	PER DIEM Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	3/28/84	$280.00
G. Full Name, Mailing Address and ZIP Code GAIL LEACH 3743 JOCELYN ST., N.W. WASH. D.C. 20015	PER DIEM Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	3/28/84	$280.00
E. Full Name, Mailing Address and ZIP Code CATHERINE RUSSELL 701 CAROLINA AVE READING, PA 19605	PER DIEM Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	3/28/84	$235.50
F. Full Name, Mailing Address and ZIP Code MICHAEL FRAZIER 1418 WALNUT ST PHIL., PA 19102	PER DIEM Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	3/28/84	$350.00
G. Full Name, Mailing Address and ZIP Code CFR LEASING P.O. BOX 622 / 1800 HILTON RD NEW CASTLE, DEL 19720 / PEQUANNOCK, NJ 07440	CAR RENTAL Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	3/28/84	$600.00
H. Full Name, Mailing Address and ZIP Code GRAY COMMUNICATIONS 575 VIRGINIA AVE. FORT WASH., PA 19034	TELEPHONE EQUIPMT. Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	3/29/84	$307.10
I. Full Name, Mailing Address and ZIP Code DIANE THOMPSON 1418 WALNUT ST. PHIL., PA 19102	FULLTIME RENTAL & PETTY CASH FOR OFFICE Disbursement for: ☐ Primary ☐ General ☐ Other (specify): SUPPLIES	3/29/84	$150.00
SUBTOTAL of Disbursements This Page (optional)			$2512.60
TOTAL This Period (last page this line number only)			

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SCHEDULE B — **ITEMIZED DISBURSEMENTS**

LINE NUMBER 11
(Use separate schedule(s) for each category of the Detailed Summary Page)

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

Name of Committee (In Full)

PA. AT-LARGE DELEGATES FOR MONDALE

	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Full Name, Mailing Address and ZIP Code CATHERINE RUSSELL 701 CAROLINA AVE. READING, PA 19605	STAFF DINNER EXPENSES Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	3/29/84	$108.00
B. Full Name, Mailing Address and ZIP Code DIANE THOMPSON 1418 WARNER ST. PHIL. PA 19102	PETTY CASH FOR Disbursement for: ☐ Primary ☐ General ☐ Other (specify): OFC SUPPLIES	3/29/84	$100.00
C. Full Name, Mailing Address and ZIP Code KENNEDY PRINTING 5534 BALTIMORE AVE PHIL, PA 19143	Purpose of Disbursement PRINTING OF SCHEDULES AND BROCHURES: BALLOT AND ABSENTEE Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	3/29/84	$502.00
D. Full Name, Mailing Address and ZIP Code SURVEY SAMPLING, INC 180 POST RD. EAST WESTPORT, CONN. 06880	PHONE SURVEY Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	3/30/84	$535.00
E. Full Name, Mailing Address and ZIP Code DIANE THOMPSON 1418 WARNER ST. PHIL, PA 19102	OFFICE EXP. - PETTY CASH Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	3/30/84	$100.00
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			$5843.00
TOTAL This Period (last page this line number only)			$14119.85

85040505013

8504050051 2

MONDALE

EXHIBIT "B"



PEPPER, HAMILTON & SCHEETZ
ATTORNEYS AT LAW
2001 FIDELITY BUILDING
123 SOUTH BROAD STREET
PHILADELPHIA, PA. 19109

TO

Stephen Mims, Esquire
General Counsel's Office
Federal Election Commission
1325 K Street, NW
Washington, DC 20463

Mail

REGISTERED MAIL

R 185 154 953

RECEIVED BY THE FEC
Gen # 3815

PEPPER, HAMILTON & SCHEETZ

84 JUN 26 A 8:44

ATTORNEYS AT LAW

1777 F STREET, N.W.
WASHINGTON, D.C. 20006
202-842-0100

10 SOUTH MARKET SQUARE
HARRISBURG, PA 17108
717-255-1155

100 RENAISSANCE CENTER
DETROIT, MI 48243
313-259-7110

30th FLOOR
THE FIDELITY BUILDING
123 SOUTH BROAD STREET
PHILADELPHIA, PENNSYLVANIA 19109-1099
215-563-5000
CABLE ADDRESS "PEPFIL PHILADELPHIA"
TELECOPIER (group 3) 215-732-6030 · (group 2) 215-568-0644
DCX (42300) 215-568-3477 · TWX 710-670-0777

600 SOUTH OLIVE STREET
LOS ANGELES, CA 90014
213-617-0161

518 HAMILTON STREET
ALLENTOWN, PA 18101
215-434-0104

SIX CORPORATE PARK DRIVE
WHITE PLAINS, NY 10604
914-694-4500

WRITER'S DIRECT DIAL NUMBER
(215) 893-3995

June 22, 1984

84 JUN 26 A8:02

Stephen Mims, Esquire
General Counsel's Office
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: The National Right to Work Committee, et al. v. Mondale, et al., MUR 1704

Dear Mr. Mims:

I am enclosing under separate cover the responses of the Pennsylvania At-Large Delegates for Mondale Committee and the Second Congressional District Delegates for Mondale Committee to the Complaint in the above-captioned action. As the Complaint is almost wholly irrelevant to the other committees that I represent or advise, with the sole exception of the Seventh Congressional District Mondale Delegates, I will not file or advise any response on behalf of these other committees (Third, Fourth, Sixth, Eighth, Twelfth, Seventeenth and Nineteenth). I do expect that local counsel for the Seventh will take my advice and file a response.

Yours truly,

James M. Beck

JMB/bch

8504050521

PPER, HAMILTON & SCHEETZ
20TH FLOOR
THE FIDELITY BUILDING
123 SOUTH BROAD STREET
PHILADELPHIA, PA. 19109

FEC

84 JUN 28 A 8:44

Stephen Mims, Esquire
General Counsel's Office
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 29463

Conf 3568
RECEIVED AT THE FEC

Dear Sirs,

Please send all correspondence to me c/o James M. Beck
Pepper Hamilton & Scheetz
123 South Broad St.
Phila PA 19109.

Our office at 1410 Walnut Street is closed.

Thank you.

Joanne B. Cirilla
Treasurer PA At-Large
Delegates for Mondale

85040500523

Ciulla

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MUR 1667
Mims

May 25, 1984

REGISTERED MAIL

Stephen Mims
General Counsel's Office
Federal Election Commission
1325 K Street, NW
Washington, DC 20463

84 MAY 29 A4:31

Re: Americans with Hart, Inc., v. Mondale for President Committee, Inc., MUR 1667

Dear Mr. Mims:

Enclosed please find the response of the Pennsylvania At-Large Delegates for Mondale Committee to the allegations made against it by Americans with Hart, Inc. in the above-captioned matter.

Yours truly,

James M. Beck

JMB/ms

Enclosure

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May 25, 1984

Stephen Mims
General Counsel's Office
Federal Election Commission
1325 K Street, NW
Washington, DC 20463

Re: Americans with Hart, Inc. v. Mondale for President Committee, Inc., MUR 1667

Dear Mr. Mims:

This letter and supporting exhibits constitute the response of the Pennsylvania At-Large Delegates for Mondale Committee ("PALC") to the allegations concerning it,[1] which have been made in the amended complaint filed with the Federal Election Commission ("FEC") by complainant Americans with Hart, Inc. ("Hart") against respondent Mondale for President Committee, Inc. ("MPC" or "Mondale campaign").

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1. PALC has no firsthand knowledge of the activities of the Mondale for President Committee, Inc., Mondale delegate committees in other states, or Mondale district delegate committees in Pennsylvania, except insofar as the activities of these other committees brought them into contact with PALC. Therefore, PALC cannot comment on the great bulk of the allegations made in the Hart complaint.

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PALC will not attempt a detailed analysis of pertinent provisions of federal election law or federal regulations. Such analysis is not necessary at this time, and may well prove to be redundant. In this submission PALC is responding to specific charges that certain of its actions were either illegal or created an affiliation between PALC and MPC.

Before turning to these charges, a description of the legal and political climate in which PALC operated is necessary. The salient feature of Pennsylvania's primary system is the direct election of delegates. Except in the secondary sense that someone who votes for a presidential candidate is more likely to vote for his or her pledged delegates, there is no connection between the success of a presidential candidate and the success of his or her delegates.[2] Thus no Mondale delegate candidate in Pennsylvania could expect to get elected by passively relying on the appeal of Walter Mondale. Under this dual system, many of the delegate candidates would have organized something in the nature of delegate committees without any encouragement from the Mondale campaign.

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2. For instance, in the First Congressional District, Mondale won the non-binding "beauty contest" while seven of his nine delegate candidates simultaneously went down to defeat. See Exhibit "A".

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The 1984 procedure for the election of delegates is a departure from past Pennsylvania practice. In 1980, delegates were apportioned in rough accordance with the popular vote received by the candidates in each congressional district. It is true that the Mondale campaign "encouraged" the formation of delegate committees in Pennsylvania in the sense that it provided information describing the legal and practical aspects of such committees. See Exhibits "B" and "C". Since many delegate candidates were unaware of the new Pennsylvania delegate selection procedures, the Mondale campaign undertook to inform its delegate candidates of the necessity to run their own campaigns and to do so effectively. This action by the Mondale campaign promoted compliance with FEC regulations, as well, since most delegate candidates did not know that federal election law was applicable.

At-large delegate candidates occupy an unusual position in the Pennsylvania scheme. Thirty-nine members of the Pennsylvania delegation to the Democratic Convention will be at-large delegates, but such delegates are not chosen directly by the electorate. There were no at-large delegates on the ballot

in the Pennsylvania primary.[3] At large delegates are chosen at a party caucus, and are apportioned among presidential candidates according to the number of popularly elected district delegates pledged to each candidate. To maximize the number of Mondale at-large delegates, which was the purpose of PALC, it was necessary to maximize the election of district delegates pledged to Mondale.

The nature of delegate selection in Pennsylvania must be kept in mind in considering the accusations made by Hart regarding PALC.

I. Staffing

PALC was formed when several prominent Mondale supporters who figured to become at-large delegates were informed by the Mondale campaign that, because of the dual system of delegate selection in Pennsylvania, the Mondale campaign would be concentrating its limited resources exclusively on Mondale's own campaign in the state -- primarily on mass media and phone banks. The delegate candidates, both district and at-large, were essentially on their own. To the extent there was to be any

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3. Thus, to accord great prominence to at-large delegate candidates in literature published by PALC would have been counterproductive and confusing, since voters would not find their names on the ballot.

grass roots campaign, such as literature, rallies, election paraphernalia, get-out-the-vote drives, etc., it was up to the delegates to organize and finance such activities.[4]

These prominent Mondale supporters were also informed that, in order to comply with federal law, any activity which they chose to take had to be organized and financed under the aegis of a delegate committee, which would be separate from and independent of the Mondale campaign itself. It is not known how many prominent Mondale supporters were thus contacted. Four such persons, Richard Caliguri, Mayor of Pittsburgh; Wilson Goode, Mayor of Philadelphia; Edward Rendell, District Attorney of Philadelphia; and Louis Tullio, Mayor of Erie, formed PALC on March 23, 1984. See Statement of Organization, attached as Exhibit "D." Mr. Rendell became chairman and Joanne Ciulla, who had previously served as treasurer in Mr. Rendell's re-election campaign, became treasurer.

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4. The implication that PALC was being "used" by MPC, Hart April 18 Submission at 3, is incorrect. Rather than "using" PALC to "take over entire sections" of the campaign, MPC in effect abdicated responsibility for grass roots efforts to the delegates. There was never a choice between a Mondale grass roots effort and a delegate grass roots effort. The choice was between a delegate grass roots effort and none at all. Moreover, from a legal standpoint, Hart's argument confirms that delegate committees in Pennsylvania were conducting precisely the types of activities envisioned in the FEC's regulations. See 11 C.F.R. §110.13(d).

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The members of PALC intended that it would undertake a significant state-wide effort to encourage the election of Mondale delegates. Thus there was a need to find staff with experience in organizing delegate campaigns. Such campaigns were new to Pennsylvania, as direct election of delegates had not previously been the law of the Commonwealth. Since remuneration was to be limited to a per diem subsistance allowance, if that, another effective qualification was a commitment to Mondale and his delegates which would motivate the staff to work long hours for no pay.

It was also necessary to staff PALC quickly, since the Pennsylvania primary was on April 10, 1984. Given the temporary nature of the positions, the qualifications required, and the limited time and resources which could be devoted to recruitment, most if not all of the positions were filled by Mondale volunteers who became available as the primary process was completed in other states. The precise nature of the previous affiliation between members of PALC's staff and the Mondale campaign is not known. PALC does not believe that the previous employment, or lack of same, of its staff is relevant to this matter.

The criteria for affiliation are set forth in 11 C.F.R. §100.5(g)(2)(ii). Of the five factors listed in this section,

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prior work history could only be relevant to

> - the authority, power or ability of one committee [(MPC)] to hire, appoint, discipline, discharge, demote or remove or otherwise influence the decision of the officers or members of the other committee [(PALC)].

Id. Obviously MPC had no power at all over the members of PALC, since they are all well-known and significant elected officials in Pennsylvania. Ms. Ciulla, PALC's treasurer and only non-member officer, has no political connection to Mondale's campaign and her previous political involvement has been with Mr. Rendell.

Hart is attempting to create an aura of impropriety out of the mere presence of persons who previously worked for Mondale on PALC's staff. It is not surprising that PALC was staffed from the one known source of people with both the experience and the desire to undertake the work PALC had to perform after MPC abdicated responsibility for grass roots activity to Mondale delegate candidates. Hart cites no instance of any action by PALC which may be construed as being the result of impermissible influence by MPC.[5] The past employment history of PALC staff

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5. With respect to other states, Hart has attempted to show improper coordination by focusing on material printed by Mondale delegate committees. He has not done so with respect to Pennsylvania, with good reason. PALC designed all of its own literature and never merely put its name to any MPC material. (CONTINUED)

members is not a sufficient basis for concluding that PALC was affiliated with MPC.

II. Contributions to PALC

On page five of Hart's April 27 Submission, Hart attacks two contributions totalling $2,500 received by PALC from different Mondale delegate committees in New Hampshire. These contributions are well under the legal limit of $5,000, and demonstrate nothing about the relationship between PALC and any other Mondale committee. PALC did not request that these contributions be made. Nor was PALC aware of the contribution history of the New Hampshire committees. The only contact between PALC and the New Hampshire committees regarding these contributions was well after the fact when PALC sought to collect the information required by the FEC's reporting requirements.

These contributions do not implicate the affiliation criteria of 11 C.F.R. §100.5(g)(2)(ii). PALC did not engage in a "similar pattern of contributions." Indeed, it has never contributed to any out-of-state Mondale delegate committee. Nor

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See Exhibit "E". With respect to the amount of space devoted to Mr. Mondale, the FEC has never imposed any restrictions as to the content of printed matter published by delegate committees. Moreover, as already noted, any force which Hart's argument regarding insufficient promotion of delegate candidacies may have in the abstract is totally lost when applied to PALC, since its delegate candidates did not appear on the ballot.

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does the amount involved, a total of $2,500, constitute "a substantial portion" of PALC's funds. See PALC Report of Receipts and Disbursements (attached as Exhibit "F"). It is immediately obvious from the figures presented by Hart that $2,500 does not constitute "a substantial portion" of the funds of the New Hampshire committees.

Hart also makes a general attack on the acceptance by Mondale delgate committees of so-called "PAC money." See, e.g., April 27, Submission at 10. Hart's repeated reference to this so-called "issue" suggests that this action is being pursued for political rather than legal reasons, since receipt of "PAC money" is detrimental to Hart's legal position on the issue of affiliation. Acceptance of such contributions demonstrates that MPC's wishes were being ignored by the very delegate committees Hart claims that it controls.

PALC accepted contributions from political action committees knowing full well MPC's position. While MPC is a national campaign with national concerns, the outlook of PALC is limited to its function: to promote the election of the greatest possible number of Mondale at-large delegates from Pennsylvania. With respect to PALC, the great bulk of PAC contributions are those from labor union PACs. See Exhibit "F". Although Hart may feel otherwise, contributions from labor

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have been traditionally welcomed by most Pennsylvania Democrats.[6] Clearly, Hart's attempt to find fault with contributions received by PALC is more political than legal, and does not supply the basis for concluding that any violation of federal election law has been committed.

III. Contributions by PALC

Hart makes much of the fact that PALC contributed to several district delegate committees in Pennsylvania in late March. Hart April 27 Submission at 6. See Exhibit "F". These contributions are perfectly legal; Hart does not contend otherwise. Hart's argument that these contributions are evidence of "coordination" misapprehends the nature of PALC.

As previously described, at-large delegates are not on the ballot in Pennsylvania and are apportioned on the basis of pledged delegates elected at the district level. Thus, for PALC to augment the total of Mondale at-large delegates, it assisted the election of Mondale district delegates. Early on in the Pennsylvania campaign, PALC knew of the needs and capabilities of the district committees. MPC had nothing to do with PALC's

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6. That Mondale delegate committees in Pennsylvania would accept contributions from labor political action committees is particularly understandable here, since many of those seeking to become Mondale delegates are members of labor unions.

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contributions to the district delegate committees. The contributions represent "seed money" given by PALC to district committees which PALC believed could use money effectively but had not yet been able to raise money themselves. PALC could not dictate how the district delegate committees spent the contributions. Hart has provided no reason to believe that these contributions are so significant as to constitute grounds for a finding of affiliation under 11 C.F.R. §100.5(g)(2)(ii).

IV. Per Diem Payments

Hart attacks payment of per diem subsistence payments to staff and other volunteers. April 27 Submission at 8. Hart appears to be arguing that such payments, which PALC admits to making (see Exhibit "F"), are inconsistent with "'volunteer activities,' since volunteer work is not paid employment." Id. Hart's definition of volunteer work is simplistic and is belied by the statutory history of the Federal Election Campaign Act. In a related context, Congress explained: "Payments . . . for travel and subsistence or customary token payments . . . to individuals do[] not, however, remove the individual from the volunteer category." H.R. Rep. No. 96-422, 96th Cong., 1st Sess. at 9 (1979) (reprinted in [1979] U.S. Code, Cong. & Ad. News at 2869) (discussing payments to volunteers by party organizations). PALC's payment of per diem subsistence

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allowances to members of its staff and to other volunteers does not constitute a violation of federal election law.

V. Conclusion

For the reasons set forth in this response, the Commission should find no reason to believe that PALC has violated the Federal Election Campaign Act.

Respectfully submitted,

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Attorneys for JOANNE CIULLA, TREASURER, PENNSYLVANIA DELEGATES AT-LARGE FOR MONDALE

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1st C.D.

WARD		MONDALE	HART	JACKSON
	1	2432	1905	411
	2	1966	1544	1854
	5	2214	2108	666
	7	2510	1918	192
	13	1512	323	5315
	14	543	67	2235
	15	1917	1453	1092
	18	1261	1183	426
	19	1336	358	1031
	20	636	77	1820
	25	2674	2133	312
	26	2794	2434	492
	27	1138	1577	1473
PART OF	30	418	110	1426
	31	1906	1895	109
	36	3411	1685	6753
	37	1281	128	3355
	39	4930	4088	806
PART OF	42	1667 ~~821~~	404 ~~443~~	2457 ~~2605~~
	43	1829	443	2605
	47	1079	51	1851
	48	2041	1437	1299
	49	1353	518	3297
		42,848	27,839	41,27[illegible]

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EXHIBIT "A"

WARD:	1	2	5	7	13	14	15	18	19	20	25	26	27	30	31	36	37	39	42	43	47	48	49	TOTALS
EDWARD MALIN	155	242	124	68	144	42	79	67	47	56	74	364	60	80	76	353	40	365	345	115	58	196	148	3912
EILEEN KATZ	124	144	136	74	89	21	93	58	26	19	104	184	93	52	80	233	51	327	173	101	59	189	125	2522
BASIL GATTO	166	161	112	68	74	25	61	51	40	35	97	371	28	42	64	293	38	394	125	67	53	256	82	3151
MADELINE SHERRY	114	247	934	73	106	28	155	115	33	47	109	91	584	42	71	213	45	377	234	57	63	90	102	4640
LOUISE CIOTTU	191	154	108	63	87	31	45	44	40	26	90	324	47	37	68	225	47	495	140	52	53	249	103	2755
RITA RUFO	215	169	137	65	98	80	56	81	43	44	115	353	56	57	74	323	96	477	143	95	66	244	137	3814
MARTIN MADDALONI M	605	771	1425	617	401	114	773	259	128	136	1190	2345	705	196	614	2636	144	1525	634	350	459	739	566	17826
HENRY REDDY J	189	247	616	91	3702	1165	635	125	232	953	151	229	1297	878	76	3342	1238	467	150	577	712	364	2463	20378
HENRY NICHOLAS M	569	792	1681	294	639	134	798	260	122	221	467	1445	864	189	526	1659	346	1627	595	345	549	497	621	14180
JAMES RAINER	116	195	247	62	95	83	57	28	16	30	68	148	64	71	61	292	45	263	157	56	28	124	122	2380
LYDIA VELEZ J	204	854	688	110	2379	1148	607	466	287	990	127	195	1218	840	57	3211	1167	423	151	576	668	831	2420	19665
BASIL MERENDA JR.	96	190	73	50	222	59	83	58	76	88	65	208	76	31	53	183	157	324	143	146	90	1158	2271	3828
SHIRLEY GREGORY M	127	220	792	85	522	142	140	140	82	123	108	451	224	78	393	431	215	249	257	254	177	246	1485	6008
LAURA RICHLIN	64	153	213	66	204	81	135	63	75	73	72	66	149	44	51	115	129	156	115	136	171	74	2065	2540
MARY GOLDMAN M	517	685	1684	209	648	173	766	348	176	185	342	981	1034	150	552	922	221	1134	665	451	329	459	651	13540
FRANCOISE MCAREE	446	795	1661	232	432	151	879	307	123	97	526	668	459	154	365	563	264	1225	506	245	124	416	495	12616
WILBUR LOCKETT J	171	870	641	90	2659	1118	67	251	263	936	141	178	1160	769	65	3206	1330	313	155	992	648	137	2555	20140
SARAH KERR	65	148	304	52	195	79	131	85	73	106	109	87	192	35	65	112	117	135	106	135	134	67	197	2715
ANDREA D PLOSCOWE	58	121	170	38	160	78	144	66	51	102	80	67	150	18	62	98	133	127	106	125	136	51	159	2295
MARC GALLO	100	155	447	64	156	61	127	65	71	72	105	239	85	31	63	131	122	249	90	124	99	153	156	2739
JOSHUA NEIMAN	59	58	78	25	80	29	65	28	28	48	81	44	65	17	35	68	54	101	62	31	51	41	93	1263
ROBERT SPELL	66	110	138	44	75	24	53	40	27	53	41	72	107	41	37	163	115	147	76	45	31	111	66	1469
FRANCES CAPETOLA M	580	796	1458	581	724	244	925	297	162	194	1224	1167	944	207	548	1458	342	1445	1231	541	404	1581	1260	17900
FRANCES HAIRSTON J	160	783	576	122	2482	588	617	157	233	966	131	156	1004	712	111	3020	1403	376	216	934	583	701	2240	18655
JAMES BARRETT	76	54	77	44	112	42	116	73	52	54	134	104	71	18	94	445	74	148	175	114	61	142	132	2534
ROBERT HIRTZ	42	149	144	85	189	76	146	61	48	56	108	54	238	136	96	135	128	76	134	131	75	63	176	2459

List C.D. Eligibles 6th 5 0 0 5 0 8 5

	1	2	5	7	13	14	15	18	19	20	25	26	27	30	31	36	37	39	42	43	47	48	49	TOTALS	
BARBARA RHODES	167	649	407	134	319	786	341	190	137	581	213	255	872	538	130	1905	768	365	324	445	364	563	1371	14	887
PETER MUNSING	42	61	48	61	65	31	91	60	48	99	62	52	47	30	67	81	68	101	114	75	73	36	79	1	513
PATSY SMITH	438	555	406	326	537	136	784	255	458	166	430	592	719	94	287	447	250	832	697	494	469	346	630	10	830
ERIC NEILSTEIN	401	714	165	391	266	63	962	304	89	96	598	559	1584	77	403	319	121	1112	962	247	87	319	416	11	715
ESTELLE MONROE	62	71	101	99	121	38	129	68	55	53	115	97	97	14	91	328	59	118	232	111	65	80	165	2	352
JANE POLLOCK	352	678	1624	341	209	48	893	236	61	51	574	586	1533	51	372	284	56	1138	943	181	52	320	326	10	996
GARY FRIEDMAN	49	91	154	61	139	69	145	30	30	47	104	72	136	31	61	139	93	183	218	74	49	42	189	2	152
JANET PIÑA F	165	816	563	181	244	1203	625	125	211	944	119	234	1177	680	60	2010	1229	371	827	828	657	700	2259	18	651
PATRICIA HUGHES M	374	648	1588	1068	578	183	546	307	196	190	1146	873	806	141	583	732	229	1155	1223	419	458	435	585	13	546
PETER LEE	350	681	1577	391	323	40	966	257	74	53	541	564	1446	77	367	359	68	1109	878	169	66	334	352	10	806
SONIA JACOBE F	132	758	552	78	2454	1088	598	120	208	1011	107	159	1227	785	57	9013	1193	342	123	803	624	741	2257	18	357
ELIZABETH CARLTON	346	616	1526	329	153	36	899	288	66	63	544	505	1403	49	374	254	22	1055	836	149	40	262	292	10	061
EDWARD WILLIAMS	37	46	86	56	96	57	57	36	29	20	66	55	74	30	50	83	61	105	117	48	50	35	102	1	387
MARTINE ZUIDMANS	19	110	96	64	97	20	85	39	27	44	39	25	94	31	43	92	42	99	43	62	79	38	81	1	371
MARIE LEDERER M	407	602	1944	684	436	103	799	742	144	155	1367	892	690	117	680	694	181	978	894	385	411	583	476	13	779
ANDREW MACKENZIE	301	633	1634	234	141	24	806	261	44	44	540	531	1377	45	353	285	28	968	775	141	47	301	278	9	962
WENDY G. BEAR	44	46	38	43	38	11	82	28	16	14	21	24	48	44	34	169	26	38	45	27	20	29	42		927
DAVID C. HENRY F	129	799	505	69	2458	1062	558	123	185	946	108	136	1282	772	44	2958	1185	329	91	822	602	751	2303	18	306
MARGARET SCHERNOFF	64	188	96	44	72	22	52	32	87	42	34	32	43	25	28	105	38	142	68	54	53	59	85	1	355
HOWARD WEINER	374	619	1546	345	147	23	853	255	44	46	486	489	1494	39	335	236	21	949	836	123	31	272	263	9	796
BELINDA LAI	392	601	1577	903	144	28	846	246	41	35	457	445	1496	29	236	242	19	838	898	125	52	247	280	9	902
[redacted]MAN LAUDENSLAGER M	1844	585	1870	529	347	98	780	290	102	112	1835	838	658	97	498	886	85	1551	907	331	385	530	463	14	827
DANIEL SULLIVAN	1128	198	82	442	182	18	91	135	22	39	1065	323	188	62	394	1029	26	1738	584	99	79	152	19	8	169
ANDREA HALL	78	507	214	53	1391	644	890	76	89	540	139	97	848	540	47	1927	648	184	149	336	332	488	1025	10	804
ERICK BROWN	45	16	29	52	21	6	27	24	19	27	47	25	16	9	24	48	5	74	59	8	22	42	28		674
FLORENCE LOSCO	591	143	82	45	47	7	46	38	17	17	64	110	60	8	37	62	13	538	140	37	34	103	57	2	226
JONATHAN NARINS	11	9	29	28	15	6	17	17	18	9	17	28	22	6	52	26	4	18	37	4	15	19	19		424
CECILE PEREZ M	278	441	1149	579	231	164	523	205	158	111	740	425	514	89	156	412	151	595	541	255	178	340	442	9	737

8 5 0 4 0 5 0 0 5 4 0

Mondale for President
2301 Wisconsin Avenue, N.W.
Washington, D.C. 20007
Telephone: 202-625-1984

MONDALE

TO: MONDALE DELEGATES

FROM: ELAINE KAMARCK

DATE: JANUARY 12, 1984

RE: CONDUCTING YOUR CAMPAIGN FOR DELEGATE TO THE NATIONAL CONVENTION

Under the federal election laws, persons seeking election as delegates or alternates to the National Convention can form committees which are allowed to raise and expend money to support their candidacies. Care must be taken to assure that the enclosed legal guidelines are followed. This program can be of enormous benefit in assuring your election as a delegate. Following is a brief outline on how these committees should work.

I. Forming the Committee

Immediately upon being slated as a Mondale delegate, the campaign will assist each slate of delegates in forming a committee if they so desire. A memorandum explaining the legal procedures for forming a committee and registering and reporting to the FEC accompany this memo.

II. Raising Money

As soon as possible, the delegate committees should develop a fundraising plan which contains the following components:

1. Plan one or more grass roots fundraisers in your Congressional District

2. Solicit other Mondale supporters in your district for contributions to the Committee. (IMPORTANT NOTE: A person who has contributed the maximum amount to the Mondale campaign is allowed to make a contribution of up to $5,000 per person to each Mondale delegate committee subject only to the annual $25,000 limit per individual on contributions to all federal candidates.)

3. Solicit local organizations to which you may belong for contributions. (IMPORTANT NOTE: Contributions by corporations, labor unions, foreign nationals and federal contractors are not permitted. But

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EXHIBIT "B"

Paid for by Mondale for President, Inc.

Mondale for President
2301 Wisconsin Avenue, N.W.
Washington, D.C. 20007
Telephone: 333-625-1000

MONDALE

contributions from Political Action Committees of issue groups or labor unions are permitted. Individuals and Political Action Committees can contribute up to five thousand dollars to a delegate committee. Walter Mondale has made a decision not to accept money from P.A.C.'s for his campaign. Each delegate committee may make their own decision regarding P.A.C. money.)

III. Spending Money

The money raised by Delegate Committees must be spent in the district on the conduct of a grassroots campaign. Under no circumstances can money be spent for general public advertising such as T.V., radio, newspaper ads, billboards or direct mail.

Money can be spent for campaign materials to be used by volunteers such as bumper stickers, handbills, brochures, posters and yard signs which advocate the selection of a group of delegates. These materials may include information about the Mondale candidacy as well as information about the delegate candidates. There are no requirements as to the the amount of space which must be devoted to the delegate-candidates versus the amount of space devoted to Mondale, provided the purpose and message are directed towards the selection of the delegate candidates.

Before spending any money:

- Design your campaign materials.
- Arrange for a volunteer group to distribute materials.
- Plan a "Get Out the Vote" program using volunteers. (IMPORTANT NOTE: Delegate Committees can reimburse volunteers for their expenses.)

IV. Reporting

You will have to file quarterly reports with the Federal Election Commission. Therefore be sure to:

- Keep careful records of all receipts and expenditures.
- Write checks whenever possible for all expenditures so that record keeping is easier.
- Please follow the instructions on the enclosed memorandum and when in doubt do not hesitate to call the Office of the Legal Counsel here at the campaign headquarters.

Paid for by Mondale for President, Inc.

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[redacted]

January 6, 1984

RE: Delegate Expenditure Committees

FROM: David Ifshin
Lyn Oliphant

FORMING A DELEGATE COMMITTEE

Under federal election law, if a group of delegates plans to raise or spend in excess of $1000 on behalf of the delegate slate, it must form a delegate committee. This committee must file two types of forms containing routine information with the Federal Election Commission: a Statement of Organization (Form 1) and a Report of Receipts and Expenditures (Form 3X). Copies of these forms are attached. Additional forms may be obtained from the legal office at the national headquarters.

The first step for a delegate committee is to designate a treasurer and to open a separate committee bank account.

Within 10 days of the time when your delegate committee raises contributions totalling in excess of $1000 or spends more than $1000, the treasurer must file a Statement of Organization with the FEC (Form 1).

HOW TO FILL OUT A STATEMENT OF ORGANIZATION

A Statement of Organization is a simple form designed to provide the FEC with basic information about political committees. Complete instructions are on the back of the form. In order to prepare a Statement for a delegate committee, the following should be kept in mind.

Line 1: Your committee's name is inserted on line 1. Under the

EXHIBIT "C"

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law, the name of your committee must include the word "delegate(s)," and may include the name of the presidential candidate which it supports. For example, "XYZ Delegate Committee" or "XYZ Delegates for Mondale."

Line 2: This line requests the date when your group became a political committee. The date may be anytime prior to 10 days before the committee receives or expends its first $1000.

Line 3: If your committee is registering for the first time, you need not fill in this blank.

Line 4: If your committee is registering for the first time, you should check "NO."

Line 5: Delegate committees should check "(c)" and fill in the name of Walter F. Mondale.

Line 6: Fill in "NONE."

Line 7: This line requests the name of the person who will keep the records and books of your committee. If this is the treasurer, you may simply fill in "Treasurer."

Line 8: This line requests the name and address of the treasurer and assistant treasurer, if any. Your committee must have a treasurer, but need not have an assistant treasurer. The treasurer and assistant treasurer may, but are not required to be, candidates for delegate.

Line 9: Your committee funds must be kept in a separate checking account which contains only committee funds. This line requests the name and address of the bank in which the committee has its account. If for any reason a second account is needed or the funds are to be kept anywhere other than a bank, please consult with your state coordinator. Under the law, each committee makes

all its disbursements by check drawn on the committee's account, except for expenditures of less than $100 made from a petty cash fund. If a petty cash fund is established, records must be kept of all disbursements from it.

Once the Statement of Organization has been completed, the treasurer must sign and date it. It should then be sent to the Federal Election Commission, 1325 K Street, N.W., Washington, D.C. 20463. A copy must also be filed with the Secretary of State in your state. Any changes in the information reported on the Form must be reported to the FEC in writing within 10 days of the date of the change. Please send a copy of the Statement of Organization and all other filings of the committee with the FEC into the national headquarters, attention General Counsel's office.

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REPORTING REQUIREMENTS FOR RECEIPTS AND DISBURSEMENTS (Form 3X)

The Report of Receipts and Disbursements is a means of providing public disclosure of the financial activity of political committees. Complete instructions for periodic reporting of your financial activity are contained on the attached Report of Receipts and Disbursements (Form 3X). When completed, these reports should be forwarded to the Federal Election Commission, 1325 K Street, N.W., Washington, D.C. 20463. (A copy of the portion of the report applicable to activity in connection with a candidate's election in a state must also be filed with the Secretary of State in that state.) Please send a copy of all reports to the national headquarters, attention General Counsel's Office.

I. Quarterly Reports

Under the law, delegate committees must file quarterly Reports of Receipts and Disbursements (Form 3X) no later than April 15, July 15, October 15, and January 31 of next year. Each report must itemize the funds the committee has raised and expended during the period since the filing of the previous report.

II. Pre-election Reports

In addition to the quarterly reports, a preelection report is filed no later than the 12th day before a primary election in connection with which your committee makes contributions or expenditures. Such reports must include all transactions from the closing date of the last quarterly report filed, through the 20th day before the election. The Commission publishes lists of filing dates which are forwarded to all registered committees.

That information will also be available through the legal office at the national headquarters.

III. Contents of Reports - Receipts

The FEC forms divide receipts into eight categories for the purpose of reporting. These are:

Contributions from Individuals/Persons
Contributions from Political Committees
Transfers from Affiliated Committees
Loans Received
Loan Repayments Received
Offsets to Operating Expenditures
Contribution Refunds Received from Candidates and Committees
Other Receipts

Total receipts in these categories are reported on the Detailed Summary Page.

In addition, certain receipts are itemized on a separate Schedule A, (e.g. contributions from individuals/persons in excess of $200 or aggregating in excess of $200 during a calendar year). The instructions for Form 3X indicate those receipts which must be itemized on Schedule A. A separate Schedule A must be used for each category of receipt.

IV. Contents of Reports - Disbursements

Similarly, the FEC forms divide disbursements into eight categories for the purpose of reporting. These are:

Operating Expenditures
Transfers to Affiliated Committees
Contributions to Federal Candidates and Political Committees
Independent Expenditures
Loan Repayments Made
Loans Made
Contribution Refunds Made
Other Disbursements

Total disbursements in these categories are reported on the

Detailed Summary Page.

In addition, some disbursements must be itemized on a separate Schedule B. Three categories (operating expenditures, independent expenditures, and other disbursements) must be itemized on Schedule B only if they exceed $200 or when added to other disbursements made to the same person, aggregate over $200 during a calendar year. Disbursements under the other categories must be itemized on Schedule B regardless of amount. A separate Schedule B must be used for each category of disbursement.

V. Additional Schedules for Receipts and Expenditures

Certain kinds of receipts and expenditures must also be listed on specific schedules in addition to the general Schedules A and B. These are: loans owed by and to the committee (Schedule C); other debts and obligations (Schedule D); and independent expenditures (Schedule E).

RECORDKEEPING REQUIREMENTS

Federal election law requires your committee to keep records of all receipts and disbursements. The treasurer has the responsibility to exercise best efforts to obtain and maintain these records.

There is no specific recordkeeping or accounting system required by the law. However, it is recommended that a committee keep a separate account for each of the various categories of receipts and disbursements on the Detailed Summary Page. This will assist you in filling out the Detailed Summary Page as well as Schedules A-E, as necessary.

For contributions received in the form of a check, it is recommended that photocopies of the checks be made and kept by

the committee's treasurer.

All disbursements must be made by check or similar draft from a committee depository, except petty cash expenditures of $100 or less. A written journal of disbursements from petty cash must be maintained.

The Committee treasurer must preserve all records for 3 years after the filing date of the report corresponding to the records.

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STATEMENT OF ORGANIZATION

(see reverse side for instructions)

1. (a) Name of Committee (In Full) ☐ Check if name or address is changed.
Delegates At-Large for Mondale

2. Date
March 23, 1987

(b) Address (Number and Street)
1418 Walnut St.

3. FEC Identification Number

(c) City, State and ZIP Code
Philadelphia PA 19103

4. Is this an amended Statement? ☐ YES ☒ NO

5. TYPE OF COMMITTEE (check one):

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

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

Name of Candidate	Candidate Party Affiliation	Office Sought	State/District

☒ (c) This committee supports/opposes only one candidate Delegates for Mondale and is NOT an authorized committee.
(name of candidate)

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

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

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

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

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

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

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

Full Name	Mailing Address and ZIP Code	Title or Position
Joanne B. Ciulla	717 Pine St. Phila. PA 19106	Treasurer

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

Full Name	Mailing Address and ZIP Code	Title or Position
Joanne B Ciulla	+Treasurer (215) 925-3667	

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

Name of Bank, Depository, etc.	Mailing Address and ZIP Code
Continental Bank	Centre Square 1500 Market St. Phila PA 19102

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

Joanne B Ciulla — Joanne B Ciulla — _____
Type or Print Name of Treasurer — SIGNATURE OF TREASURER — Date

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

For further information contact: Federal Election Commission, Toll Free 800-424-9530, Local 202-523-4068

FEC FORM 1 (3/80)

EXHIBIT "D"

85040050553

INVOICE/STATEMENT

publiSET Inc.
220 W. GIRARD AVE. PHILA., PA. 19123
(215) 925-7827

DATE
4-10-84

Dianne Thompson
Mondale Pennsylvania at Large
Delegate Committee
1418 Walnut Street
Philadelphia, Pa. 19102

PLEASE DETACH AND RETURN WITH YOUR REMITTANCE $ _____

DATE	ISSUE NO.	CHARGES AND CREDITS	AMOUNT
4-5-84		Consulting, redesign and mechnical creation	1,424.00
		Printing 300,000 13" newsprint tabs	7,000.00
			8,424.00
		Paid Ch #1017 4-5-84	5,000.00
		Paid balance 4-6-84	3,484.00
			-0-

2 check 5000.00 3,484.00

CURRENT | PAST DUE | PAST DUE | PAST DUE

A FINANCE CHARGE OF 1½ PERCENT IS APPLIED TO ANY PORTION OF THE NEW BALANCES OVER 30 DAYS. (ANNUAL RATE 18%.) MINIMUM CHARGE IS 75 CENTS. BILLS ARE DUE AND PAYABLE ON THE DATE OF THE NEWSPAPER IN WHICH THE AD APPEARED.

PAY LAST AMOUNT IN THIS COLUMN.

CUSTOMER COPY – PLEASE KEEP FOR YOUR RECORDS

EXHIBIT "E"

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Custom Graphics

1813 Ranstead Street Philadelphia, PA 19103 565 0114

Providing quality phototypesetting via telecommunication with compu s and word processing systems, as well as serving all of your phototypesetting eeds. Photostats – from 25% to 300%. fast pick-up and delivery – fast turnaround.

Mondale Delegate Selection Committee
1418 Walnut Street
Philadelphia, PA 19102

Re: Mr. John Bell

INVOICE #	360
CG JOB #	MD/314
DATE	April 04, 1984
YOUR P.O. #	Mondale
YOUR JOB #	for President
CLIENT	

DESCRIPTION	AMOUNT
Typography & stats for, design & Layout, for production of 4 sided tabloid, with inserts and 5 artist rendings	
ISRAEL & THE MIDDLE EAST	
SENIOR CITIZENS	
THREE MILE ISLAND	
JOBS & THE ECONOMY	$1,800.00
SUBTOTAL	$1,800.00
TAX	
AMOUNT DUE	$1,800.00

TERMS DUE UPON RECEIPT

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Custom Graphics

1813 Ranstead Street Philadelphia, PA 19103 568-0114

Providing quality photocypesetting via telecommunicat· ..with computers and word processing systems, as well as serving all of your ph··tocypesecting needs. Phonesets – from 25% to 300%. Fast pick-up and deliv··y – fast turnaround.

INVOICE #	400
CG JOB #	MD/345
DATE	April 06, 1984
YOUR P.O. #	Mondale for
YOUR JOB #	President
CLIENT	Flyers

Mondale Delegate Selection Committee
1418 Walnut Street
Philddelphia, PA 19102

Re: John Bell

DESCRIPTION	AMOUNT
Typography, Stats, design, layout, type spec composition of flyers	
MONDALE HA PROBADO SER UN AMIGO DE LOS HOSPANOS	$150.00
SUBTOTAL	$150.00
TAX	
AMOUNT DUE	$150.00

Check
10472
4-13-84

TERMS DUE UPON RECEIPT

8504050053

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

(Summary Page)

ALIGN AREA | | ALIGN AREA

1. Name of Committee (In Full)

PENNSYLVANIA AT-LARGE DELEGATES FOR MONDALE

Address (Number and Street)

C/O JOANNE CIULLA
717 PINE ST.

City, State and ZIP Code

PHILADELPHIA, PA 19106

☐ Check here if address is different than previously reported.

2. FEC Identification Number

C00180679

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

4. TYPE OF REPORT (Check appropriate box)

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

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

SUMMARY	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period JAN 1, 1984 through MARCH 31, 1984		
6. (a) Cash on hand January 1, 1984		$ 00.00
(b) Cash on Hand at Beginning of Reporting Period	$ 00.00	
(c) Total Receipts (from Line 18)	$ 23,500.00	$ 23,500.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ 23,500.00	$ 23,500.00
7. Total Disbursements (from Line 28)	$ 22,619.85	$ 22,619.85
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 880.15	$ 880.15
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)	$ —	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	$ —	

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

Joanne B. Ciulla
Type or Print Name of Treasurer

Joanne B. Ciulla
SIGNATURE OF TREASURER

April 13, 1984
Date

For further information contact:
Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4068

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

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

FEC FORM 3X (3/80)

EXHIBIT "F"

8504050054

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

Name of Committee (In Full): DC. AT LARGE DELEGATES FOR MONDALE

Report Covering the Period: From: JUNE 1984 To: OCT. 31 1984

	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date	
I. RECEIPTS			
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees	00.00	00.00	11(a)
(Memo Entry Unitemized $ _____)			
(b) Political Party Committees			11(b)
(c) Other Political Committees	28,500	28,500	11(c)
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c))	28,500	28,500	11(d)
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES	00.00	00.00	12
13. ALL LOANS RECEIVED	00.00	00.00	13
14. LOAN REPAYMENTS RECEIVED	00.00	00.00	14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	00.00	00.00	15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	00.00	00.00	16
17. OTHER RECEIPTS (Dividends, Interest, etc.)	00.00	00.00	17
18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)	28,500.00	28,500.00	18
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES	14117.85	14117.85	19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES			20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	8500.00	8500.00	21
22. INDEPENDENT EXPENDITURES (use Schedule E)			22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. § 441 a(d)) (Use Schedule F)			23
24. LOAN REPAYMENTS MADE			24
25. LOANS MADE			25
26. REFUNDS OF CONTRIBUTIONS TO			
(a) Individuals/Persons Other Than Political Committees			26(a)
(b) Political Party Committees			26(b)
(c) Other Political Committees			26(c)
(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))			26(d)
27. OTHER DISBURSEMENTS			27
28. TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	22614.85	22614.85	28
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)	28500.00	28500.00	29
30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)	—		30
31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)	28500.00	28,500.00	31
32. TOTAL OPERATING EXPENDITURES from Line 19	14,117.85	14,117.85	32
33. OFFSETS TO OPERATING EXPENDITURES from Line 15	—	—	33
34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)	14,117.85	14,117.85	34

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SCHEDULE A **ITEMIZED RECEIPTS**

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

Name of Committee (In Full)
DP. AT-LARGE DELEGATES FOR MONDALE

	Name of Employer / Occupation / Aggregate Year-to-Date	Date (month, day, year)	Amount of Each Receipt this Period
A. Full Name, Mailing Address and ZIP Code PAC BRICKLAYERS + ALLIED CRAFTSMEN 815 FIFTEENTH ST. N.W. WASH, D.C. 20005 Receipt For: ☑ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—$ 2,000	3/26/84	2,000.00
B. Full Name, Mailing Address and ZIP Code AMERICAN FEDERATION OF TEACHERS 11 DUPONT CIRCLE N.W. WASH. D.C. 20036 Receipt For: ☑ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—$ 5,000.	3/22/84	5,000.00
C. Full Name, Mailing Address and ZIP Code NEW HAMPSHIRE 2ND DIST. DELEGATES FOR MCDDALE 4 NEIL DR. ALLENTOWN, N.H. Receipt For: ☑ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—$ 1,500	3/22/84	1,500.00
D. Full Name, Mailing Address and ZIP Code NEW HAMPSHIRE 1ST DIST. DELEGATES FOR MONDALE 5 HAYDES DR. MERIMAK, N.H. Receipt For: ☑ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—$ 1,000	3/22/84	1,000.00
E. Full Name, Mailing Address and ZIP Code SEIU COMMITTEE ON POLITICAL EDUCATION SERVICE EMPLOYEES INT'L UNION, AFL-CIO 2020 K ST. N.W. WASH D.C. 20006 Receipt For: ☑ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—$ 4,500	3/26/84	4,000.00
F. Full Name, Mailing Address and ZIP Code UNITED AUTO WORKERS INT'L UNION 8000 EAST JEFFERSON AVE. DETROIT, MICH. 48214 Receipt For: ☑ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—$ 5,000	3/26/84	5,000.00
G. Full Name, Mailing Address and ZIP Code AMER. FED. OF STATE CO. + MUN. EMP. LEGISLATIVE/POLITICAL ACTION DEPT. 1625 L ST. N.W. WASH D.C. 20036 Receipt For: ☑ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—$ 5,000	3/22/84	5,000.00
SUBTOTAL of Receipts This Page (optional)			22,500
TOTAL This Period (last page this line number only)			

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SCHEDULE A **ITEMIZED RECEIPTS**

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

Name of Committee (In Full)
PA. AT-LARGE DELEGATES FOR MONDALE

A. Full Name, Mailing Address and ZIP Code COMMUNICATIONS WORKERS OF AMER.-C.O.P.E. 1925 K ST., N.W. WASH., D.C. 20006 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$ 5000	Date (month, day, year) 5/29/84	Amount of Each Receipt this Period $5,000.00
B. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
C. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
D. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
E. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
F. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
G. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
SUBTOTAL of Receipts This Page (optional)			$5000.00
TOTAL This Period (last page this line number only)			$28,500.00

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Page 1 of 3 pages

SCHEDULE B **ITEMIZED DISBURSEMENTS**

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)

PA. AT-LARGE DELEGATES FOR MONDALE

A. Full Name, Mailing Address and ZIP Code BELL OF PENNSYLVANIA ONE PARKWAY PHIL., PA. 19102	Purpose of Disbursement TELEPHONE SERVICE Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 3/23/84	Amount of Each Disbursement This Period $1,600.00
B. Full Name, Mailing Address and ZIP Code GRAY COMMUNICATIONS 575 VIRGINIA DR. FORT WASH., PA. 19034	Purpose of Disbursement TELEPHONE EQUIP. Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 3/22/84	Amount of Each Disbursement This Period $2,761.00
C. Full Name, Mailing Address and ZIP Code BELLEVUE STRATFORD HOTEL BROAD & WALNUT ST. PHIL. PA 19102	Purpose of Disbursement STAFF LODGING Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 3/23/84	Amount of Each Disbursement This Period $109.00
D. Full Name, Mailing Address and ZIP Code RICHARD I. RUBIN & CO., INC 1760 MARKET ST. PHIL., PA 19103	Purpose of Disbursement RENT ON OFFICE Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 3/23/84	Amount of Each Disbursement This Period $500.00
E. Full Name, Mailing Address and ZIP Code DIANE THOMPSON 1418 WALNUT ST. PHIL., PA. 19102	Purpose of Disbursement PETTY CASH-OFC SUPPLIES Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 3/25/84	Amount of Each Disbursement This Period $100.00
F. Full Name, Mailing Address and ZIP Code U.S. AIR, INC. WASH. NAT'L AIRPORT WASH., D.C. 20001	Purpose of Disbursement STAFF TRAVEL Disbursement for: ☐ Primary ☐ General ☐ Other (specify): (PHL-PITTS)	Date (month, day, year) 3/27/84	Amount of Each Disbursement This Period $124.00
G. Full Name, Mailing Address and ZIP Code BENJAMIN ASHER 54 WINDMERE RD. NEWTON, MA. 02166	Purpose of Disbursement PER DIEM Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 3/27/84	Amount of Each Disbursement This Period $201.60
H. Full Name, Mailing Address and ZIP Code BENJAMIN ASHER 54 WINDMERE RD. NEWTON, MA 02166	Purpose of Disbursement TRAVEL EXPENSES Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 3/27/84	Amount of Each Disbursement This Period $134.75
I. Full Name, Mailing Address and ZIP Code ALAN GULKULAN 1418 WALNUT ST. PHL., PA 19102	Purpose of Disbursement PER DIEM Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 3/27/84	Amount of Each Disbursement This Period $234.50
SUBTOTAL of Disbursements This Page (optional)			$5764.25
TOTAL This Period (last page this line number only)			

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Page 2 of 3 pgs
LINE NUMBER 21
Enter amount scheduled for each category of the Detailed Summary Page

SCHEDULE B — ITEMIZED DISBURSEMENTS

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)

PA. AT-LARGE DELEGATES FOR MONDALE

	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Full Name, Mailing Address and ZIP Code MARTIN DAVIS 3228 EISENBROWN RD READING, PA	REIM. FOR MISC MILES Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	3/28/84	$121.90
B. Full Name, Mailing Address and ZIP Code CLARE E. THOMPSON 1418 WALNUT ST. PHIL., PA. 19102	REIM FOR FREIGHT CHARGES Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	3/28/84	$189.20
C. Full Name, Mailing Address and ZIP Code DIANE THOMPSON 1418 WALNUT ST. PHIL., PA 19102	PER DIEM Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	3/24/84	$280.00
D. Full Name, Mailing Address and ZIP Code GAIL LEACH 3743 JOCELYN ST., N.W. WASH. D.C. 20015	PER DIEM Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	3/24/84	$280.00
E. Full Name, Mailing Address and ZIP Code CATHERINE RUSSELL 701 CAROLINA AVE READING, PA 19605	PER DIEM Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	3/24/84	$235.50
F. Full Name, Mailing Address and ZIP Code MICHAEL FRAZIER 1418 WALNUT ST PHIL., PA 19102	PER DIEM Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	3/28/84	$350.00
G. Full Name, Mailing Address and ZIP Code CFR LEASING P.O. BOX 622/1800 HILTON RD NEW CASTLE, DEL 19720/PENNSAUKEN, NJ 08110	CAR RENTAL Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	3/28/84	$600.00
H. Full Name, Mailing Address and ZIP Code GRAY COMMUNICATIONS 575 VIRGINIA AVE. FORT WASH., PA 19034	TELEPHONE EQUIPMT. Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	3/29/84	$307.00
I. Full Name, Mailing Address and ZIP Code DIANE THOMPSON 1418 WALNUT ST. PHIL., PA 19102	FULL-TIME RENTAL & PETTY CASH FOR OFFICE Disbursement for: ☐ Primary ☐ General ☐ Other (specify): SUPPLIES	3/29/84	$150.00
SUBTOTAL of Disbursements This Page (optional)			$2512.60
TOTAL This Period (last page this line number only)			

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SCHEDULE B **ITEMIZED DISBURSEMENTS**

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

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

Name of Committee (In Full)

PA. AT-LARGE DELEGATES FOR MONDALE"

	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Full Name, Mailing Address and ZIP Code CATHERINE RUSSELL 701 CAROLINA AVE. READING, PA 19605.	STAFF DINNER EXPENSES Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	3/29/84	$108.00
B. Full Name, Mailing Address and ZIP Code DIANE THOMPSON 1418 WARNET ST. PHIL. PA 19102	PETTY CASH FOR Disbursement for: ☐ Primary ☐ General ☐ Other (specify): OFC SUPPLIES	3/29/84	$100.00
C. Full Name, Mailing Address and ZIP Code KENNEDY PRINTING 5534 BALTIMORE AVE PHIL, PA 19143	Purpose of Disbursement PRINTING OF SCALE AND BROCHURES; BUTTONS Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	3/29/84	$502.00
D. Full Name, Mailing Address and ZIP Code SURVEY SAMPLING, INC 180 POST RD. EAST WESTPORT, CONN. 06880	Purpose of Disbursement PHONE SURVEY Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	3/30/84	$535.00
E. Full Name, Mailing Address and ZIP Code DIANE THOMPSON 1418 WARNET ST. PHIL, PA 19102	Purpose of Disbursement OFFICE EXP. - PETTY CASH Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	3/30/84	$100.00
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			$5843.00
TOTAL This Period (last page this line number only)			$14119.85

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Page 1 of 1 Pages
LINE NUMBER 21
(Use separate schedule(s) for each category of the Detailed Summary Page)

SCHEDULE B **ITEMIZED DISBURSEMENTS**

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Name of Committee (In Full)

PA. AT LARGE DELEGATES FOR MONDALE

Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for / Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
A. 13th CONG. DIST. DEL. FOR MONDALE JOSEPH MANKO, TREAS. PACKARD BLDG, 12th FL. PHIL, PA	Purpose: 13th CONG - GENERAL DIST. DELEGATES; DELEGATE TO DEMO. CONVENTION / Disbursement for: Primary / Other: $1500 YTD	3/05/84	$1000.00
B. THE MONDALE TEAM - 8th C.D. THOMAS MELLON, TREAS. EAST COURT ST. DOYLESTOWN, PA 18901	Purpose: 8th CONG DIST. DELEGATES; DELEGATE TO DEM. NATIONAL CONVENTION / $1500 YTD / Disbursement for: Primary / Other:	3/27/84	$1000.00
C. 15th CONG. DIST. DEL. FOR MONDALE C/O KAREN RITTER 4075 TILGHMAN ST. ALLENTOWN, PA 18104	Purpose: 15th CONG. DIST DELEGATES; DELEGATE TO DEM. NAT'L CONVENTION / $1500 YTD / Disbursement for: Primary / Other:	3/27/84	$1000.00
D. MONDALE DELEGATE COMM. - 6th C.D. LARRY MELLIN TREAS. 4622 DOUGLASS ST. READING, PA. 19601	Purpose: 6th CONG. DIST. DELEGATES; DELEGATE TO DEMO. NAT'L CONVENTION; $1500 YTD / Disbursement for: Primary / Other:	3/27/84	$1000.00
E. 13th CONG. DIST. DELEGATES FOR MONDALE JOSEPH MANKO, TREAS. PACKARD BLDG, 12th FL. PHIL PA 19102	Purpose: 13th CONG. DIST. DELEGATES; DELEGATE TO DEMO. NAT'L CONVENTION; $1500 YTD / Disbursement for: Primary / Other:	3/28/84	$500.00
F. '84 DELEGATES FOR MONDALE DELORES BROSS, TREAS. 2807 OAK WOOD ERIE PA 16508	Purpose: 2nd CONG. DIST. DELEGATES; DELEGATES TO DEMO NATIONAL CONV. $1000 YTD / Disbursement for: Primary / Other:	3/28/84	$1000.00
G. 10th CONG. DIST. DELE. COMM. JOSEPH COGNETTI, TREAS. 232 VASSAR AVE. CLARKS GREEN, PA 18411	Purpose: 10th CONG. DIST. DELEGATES; DELEGATES TO DEM'O NAT'L CONVENTION $1500 YTD / Disbursement for: Primary / Other:	3/28/84	$1000.00
H. THE MONDALE TEAM - 8th C.D. THOMAS MELLON, TREAS. EAST COURT ST. DOYLESTOWN, PA 18901	Purpose: 8th CONG. DIST. DELEGATES; DELEGATE TO DEM. NAT'L CONVENTION; $2000 YTD / Disbursement for: Primary / Other:	3/29/84	$1000.00
I. 7th CONG. DIST. MONDALE DEL. PAC NANCY BALLIS, TREAS. 90 BARBARA RD. CREXEL HILL, PA 19026	Purpose: 7th CONG. DIST. DELEGATES; DELEGATES TO DEM. NAT'L CONVENTION; $1500 YTD / Disbursement for: Primary / Other:	3/29/84	$1000.00
SUBTOTAL of Disbursements This Page (optional)			$8500.00
TOTAL This Period (last page this line number only)			$8500.00

*SEE SEPARATE SHEET WHICH IDENTIFIES DELEGATES BY CONG. DIST.

8504050056



PEPPER, HAMILTON & SCHEETZ
ATTORNEYS AT LAW
2001 FIDELITY BUILDING
123 SOUTH BROAD STREET
PHILADELPHIA, PA. 19109

To

Stephen Mims
General Counsel's Office
Federal Election Commission
1325 K Street, NW
Washington, DC 20463

REGISTERED MAIL

REGISTERED MAIL

R 185 154 941

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84 MAY 21 A9:28

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ATTORNEYS AT LAW

1777 F STREET, N.W.
WASHINGTON, D.C. 20006
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SIX CORPORATE PARK DRIVE
WHITE PLAINS, NY 10604
914-694-4800

WRITER'S DIRECT DIAL NUMBER
(215) 893-3995

May 17, 1984

94 MAY 21 P3:12

8504005063

Mr. Stephen Mims
General Counsel's Office
Federal Election Commission
1325 K Street, NW
Washington, DC 20463

Re: Americans With Hart, Inc., v. Mondale
For President Committee, Inc., MUR 1667

Dear mr. Mims:

This letter is to confirm our telephone communication of May 15, 1984 in which you informed me that the Commission had reconsidered its previous action and had decided to grant my client, Pennsylvania At-Large Delegates for Mondale, fifteen days from its receipt of Hart's second supplemental submission in which to file its response. As indicated in my letter of May 11, Hart's second supplemental submission was received by my client on May 10, 1984, therefore I understand that the response is now due on May 25, 1984, with three aditional days allowed for mailing to the Commission by registered mail.

My client thanks the Commission for reconsidering in light of my client's somewhat unusual position, as described in my letter of May 11. The decision of the Commission is reassuring, since it suggests that any action by the Commission will take into account the particular facts as they relate to my client.

You also mentioned that the Commission had received yet another submission from Hart, which you were not sending out to the various Mondale committees because the Commission did not

believe that a response was required. If possible, I would appreciate a copy of this latest submission, if you are sending out copies on a "for information only" basis.

Yours truly,

James M. Beck

JMB/ms

cc: Lee Ann Elliot, Chairman
Thomas E. Harris, Vice Chairman
Joan D. Aikens
Danny Lee McDonald
John Warren McGarry

8504050054

ames M. Beck
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84 MAY 21 A9:29

Mr. Stephen Mims
General Counsel's Office
Federal Election Commission
1325 K Street, NW
Washington, DC 20463

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84 MAY 14 AM 10:18

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ATTORNEYS AT LAW

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914-694-4500

WRITER'S DIRECT DIAL NUMBER
(215) 893-3995

May 11, 1984

VIA FEDERAL EXPRESS

Stephen Mims, Esquire
General Counsel's Office
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: Americans with Hart, Inc. v. Mondale for President Committee, Inc., MUR 1667

Dear Mr. Mims:

This letter is in response to your telephone call of May 10, 1984, in which you informed me that the FEC had denied my client, Pennsylvania Delegates At-Large for Mondale, a fifteen day extension in which to respond to charges made against it in the above-captioned matter. While it was within the discretion of the FEC to deny this request, you also stated that the latest Hart submission, the third in as many weeks ("Hart III"), was not to be considered an "amendment" to the original complaint. The effect of your characterization of Hart III was to deny my client its statutory entitlement under 2 U.S.C. §437(g) to fifteen days from date it received Hart III in which to file its response.

Since Hart III was once again directed to my client's closed campaign office, it was only delivered to my client the morning of the date of your call. I had not had the opportunity to review it before you called. Having now read Hart III, I must disagree strongly with the decision not to characterize it as an "amendment" with respect to my client.

Hart's initial complaint of April 6 ("Hart I"), while it made mention of Pennsylvania, made no allegations regarding my client. The first reference to the Pennsylvania At-Large committee occurred in a footnote on page 7 of Hart's first amendment ("Hart II"). The footnote concerned the staff

84 MAY 14 PM 2:19

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of my client. This is the sole mention of Pennsylvania At-Large in Hart II, and it was only after Hart II that the FEC decided to treat my client as if it were a respondent in this case.

The FEC's refusal to treat Hart III as an "amendment" with respect to my client is erroneous because Hart III drastically changes the allegations to which my client must respond. While staffing was the only aspect of my client's operation being challenged heretofore, Hart III makes three new allegations concerning completely unrelated areas: contributions to my client, id. at 5, transfer of funds by my client to other delegate committees in Pennsylvania, id. at 6, and per diem subsistance payments to volunteers. Id. at 8. Thus, instead of one issue, my client is now expected to research and respond to four.

The FEC's action with respect to my client is particularly egregious since Hart III was not received until May 10, only five days before the response is due. By the same logic, if Hart III (or even Hart IV) were to have arrived on May 14, my client would be required to respond to new charges overnight.

My client requests that the FEC immediately reconsider its position that Hart III does not constitute an "amendment" with respect to Pennsylvania Delegates At-Large for Mondale. The Commission is acting in contravention of the statute which specifies the procedures that it must follow, with the result that my client is being denied the opportunity and means to challenge fully the allegations against it. Inevitably, this denial will impact on the ability of my client to receive a fair and impartial hearing by the Commission.

Thank you for your prompt consideration of this matter.

Yours truly,

James M. Beck
Counsel for Joanne Ciulla,
Treasurer, Pennsylvania
Delegates At-Large for Mondale

JM/bh
cc: Lee Ann Elliot, Chairman
Thomas E. Harris, Vice Chairman
Joan D. Aikens
Danny Lee McDonald
John Warren McGarry

8504050567

JAMES M. BECK

PEPPER, HAMILTON & SCHEETZ
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PHILADELPHIA, PA. 19109

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84 MAY 14 A10:18

Stephen Mims, Esquire
General Counsel's Office
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

BCC # 3151

PEPPER, HAMILTON & SCHEETZ

ATTORNEYS AT LAW

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10 SOUTH MARKET SQUARE
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DCA (#36001) 215-546-3477 · TWX 710-670-0777

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510 HAMILTON STREET
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WHITE PLAINS, NY 10604
914-694-4600

WRITER'S DIRECT DIAL NUMBER
(215) 893-3995

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COMMISSION SECRETARY

84 MAY 14 P12:54

MUR 1667
Mims 3146
Copy of

May 11, 1984

VIA FEDERAL EXPRESS

Stephen Mims, Esquire
General Counsel's Office
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

84 MAY 14 P3:09

Re: Americans with Hart, Inc. v. Mondale for President Committee, Inc., MUR 1667

Dear Mr. Mims:

This letter is in response to your telephone call of May 10, 1984, in which you informed me that the FEC had denied my client, Pennsylvania Delegates At-Large for Mondale, a fifteen day extension in which to respond to charges made against it in the above-captioned matter. While it was within the discretion of the FEC to deny this request, you also stated that the latest Hart submission, the third in as many weeks ("Hart III"), was not to be considered an "amendment" to the original complaint. The effect of your characterization of Hart III was to deny my client its statutory entitlement under 2 U.S.C. §437(g) to fifteen days from date it received Hart III in which to file its response.

Since Hart III was once again directed to my client's closed campaign office, it was only delivered to my client the morning of the date of your call. I had not had the opportunity to review it before you called. Having now read Hart III, I must disagree strongly with the decision not to characterize it as an "amendment" with respect to my client.

Hart's initial complaint of April 6 ("Hart I"), while it made mention of Pennsylvania, made no allegations regarding my client. The first reference to the Pennsylvania At-Large committee occurred in a footnote on page 7 of Hart's first amendment ("Hart II"). The footnote concerned the staff

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of my client. This is the sole mention of Pennsylvania At-Large in Hart II, and it was only after Hart II that the FEC decided to treat my client as if it were a respondent in this case.

The FEC's refusal to treat Hart III as an "amendment" with respect to my client is erroneous because Hart III drastically changes the allegations to which my client must respond. While staffing was the only aspect of my client's operation being challenged heretofore, Hart III makes three new allegations concerning completely unrelated areas: contributions to my client, id. at 5, transfer of funds by my client to other delegate committees in Pennsylvania, id. at 6, and per diem subsistance payments to volunteers. Id. at 8. Thus, instead of one issue, my client is now expected to research and respond to four.

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My client requests that the FEC immediately reconsider its position that Hart III does not constitute an "amendment" with respect to Pennsylvania Delegates At-Large for Mondale. The Commission is acting in contravention of the statute which specifies the procedures that it must follow, with the result that my client is being denied the opportunity and means to challenge fully the allegations against it. Inevitably, this denial will impact on the ability of my client to receive a fair and impartial hearing by the Commission.

Thank you for your prompt consideration of this matter.

Yours truly,

James M. Beck
Counsel for Joanne Ciulla,
Treasurer, Pennsylvania
Delegates At-Large for Mondale

JM/bh
cc: Lee Ann Elliot, Chairman
Thomas E. Harris, Vice Chairman
Joan D. Aikens
Danny Lee McDonald
John Warren McGarry

8504050570

JAMES M. BECK

PEPPER, HAMILTON & SCHEETZ
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123 SOUTH BROAD STREET
PHILADELPHIA, PA. 19109

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84 MAY 14 A10 : 1

Lee Ann Elliot, Chairman
General Counsel;s Office
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

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CCC #3093
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ATTORNEYS AT LAW

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202-842-8100

10 SOUTH MARKET SQUARE
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SIX CORPORATE PARK DRIVE
WHITE PLAINS, NY 10604
914-694-4800

WRITER'S DIRECT DIAL NUMBER
(215) 893-3995

May 8, 1984

9 P2:30

8504005572

BY OVERNIGHT COURIER

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

Re: Americans with Hart, Inc. v. Mondale for President Committee, Inc., MUR 1667

Dear Mr. Mims:

Enclosed please find the Statement of Designation of Counsel executed by Joanne B. Ciulla, Treasurer of Pennsylvania Delegates At-Large for Mondale, in the above-captioned matter. Please note Ms. Ciulla's address. Your initial letter was addressed to the campaign office, which is closed.

On April 30, 1984, Ms. Ciulla received your letter of April 26. Therefore, her response is due on May 15, 1984. Ms. Ciulla requests an extension of fifteen days, until May 30, 1984, in which to file a response. The press of other urgent business, along with delay arising from the necessity of forwarding the notification materials, make it impractical to file a proper response within the fifteen days allotted.

Please advise if this request for an extension is granted. Thank you for your consideration.

Yours truly,

James M. Beck
Counsel for Joanne B. Ciulla,
Treasurer
Pennsylvania At-Large Delegates
for Mondale

JMB/ms

Enclosure

cc: John M. Quinn, Esquire
Joanne Ciulla

8504050057

STATEMENT OF DESIGNATION OF COUNSEL

MUR MUR 1667

NAME OF COUNSEL: Pepper, Hamilton & Scheetz (Peter Hearn, James M. Beck, Esqs.')

ADDRESS: 2001 The Fidelity Building
123 South Broad Street
Philadelphia, PA 19103

TELEPHONE: (215) 893-3000

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 4, 1984
Date

Joanne B. Ciulla
Signature

RESPONDENT'S NAME: Joanne B. Ciulla, Treasurer

ADDRESS: Mondale At-Large Delegates Committee
717 Pine St.
Philadelphia, PA 19106

HOME PHONE: 925-3667

BUSINESS PHONE: 951-1327

8504030057 1

PEPPER, HAMILTON & SCHEETZ
20TH FLOOR
THE FIDELITY BUILDING
123 SOUTH BROAD STREET
PHILADELPHIA, PA. 19109

RECEIVED BY THE FEC
84 MAY 9 A9:13

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

STATEMENT OF DESIGNATION OF COUNSEL

MUR MUR 1667

NAME OF COUNSEL: Pepper, Hamilton & Scheetz (Peter Hearn, James M. Beck, Esqs.')

ADDRESS: 2001 The Fidelity Building
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Signature

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ADDRESS: Mondale At-Large Delegates Committee
717 Pine St.
Philadelphia, PA 19106

HOME PHONE: 925-3667

BUSINESS PHONE: 951-1327

8504050575

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Lawrence P. Murin, Treasurer
Mondale Delegates Committe
422 Douglass Street
Reading, PA 19601

Re: MUR 1667

Dear Mr. Murin:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

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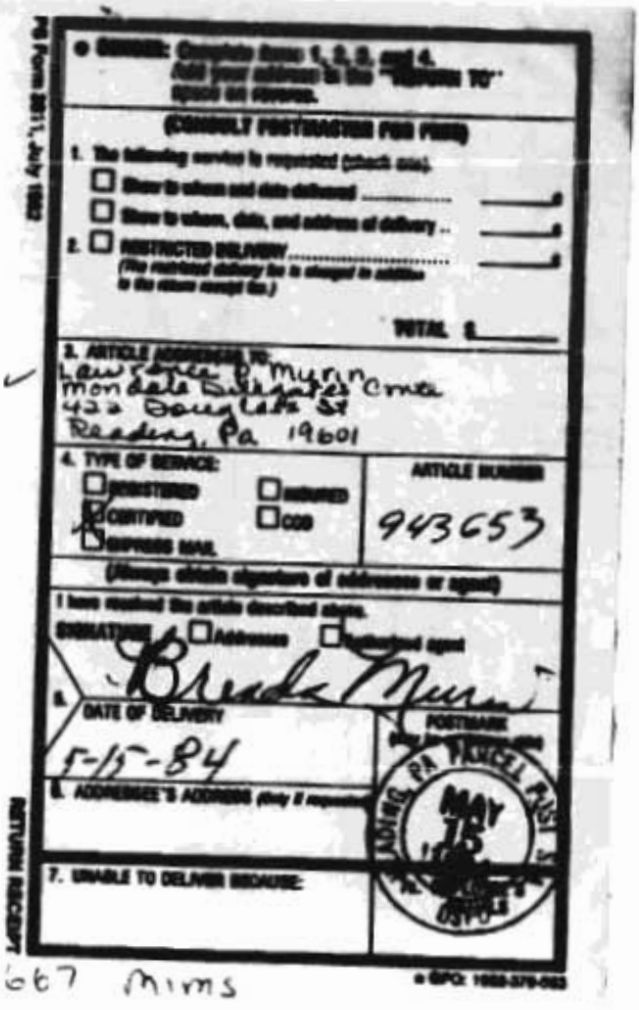
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Thomas E.Mellon, Jr, Treasurer
Mondale Delegate Team
East Court Street
Doylestown, PA 18901

Re: MUR 1667

Dear Mr. Melon:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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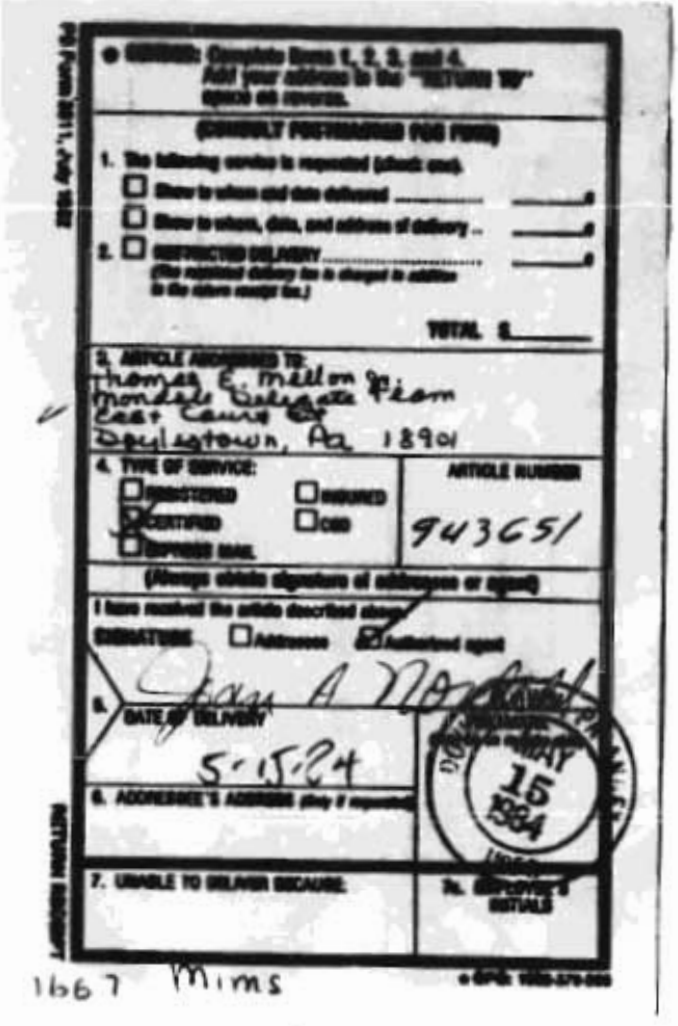
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Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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



8504058

RECEIVED AT THE FEC
GCC#3386
84 MAY 31 AM 11:

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1667

NAME OF COUNSEL: LeRoy G. Levan

ADDRESS: 539 Court St.
Reading Pa. 19601

TELEPHONE: (215) 374-3148

MUR 1667
Memo

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.

5/22/84
Date

C P Murin
Signature

RESPONDENT'S NAME: Lawrence P. Murin, Treasurer
Mondale Delegates Committee

ADDRESS: 422 Douglass St.
Reading Pa. 19601

HOME PHONE: (215) 372-8288

BUSINESS PHONE: (215) 372-4601

8504050058



Larry P. Murin
422 Douglass Street
Reading, PA 19601





Federal Elections Commission
1325 K Street, n.w.
Washington, D.C. 20463

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Kathleen Neary, Treasurer
Delegates for Mondale Committee
28 West Laughead Avenue
Boothwyn, PA 19061

Re: MUR 1667

Dear Ms. Neary:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

8504050583

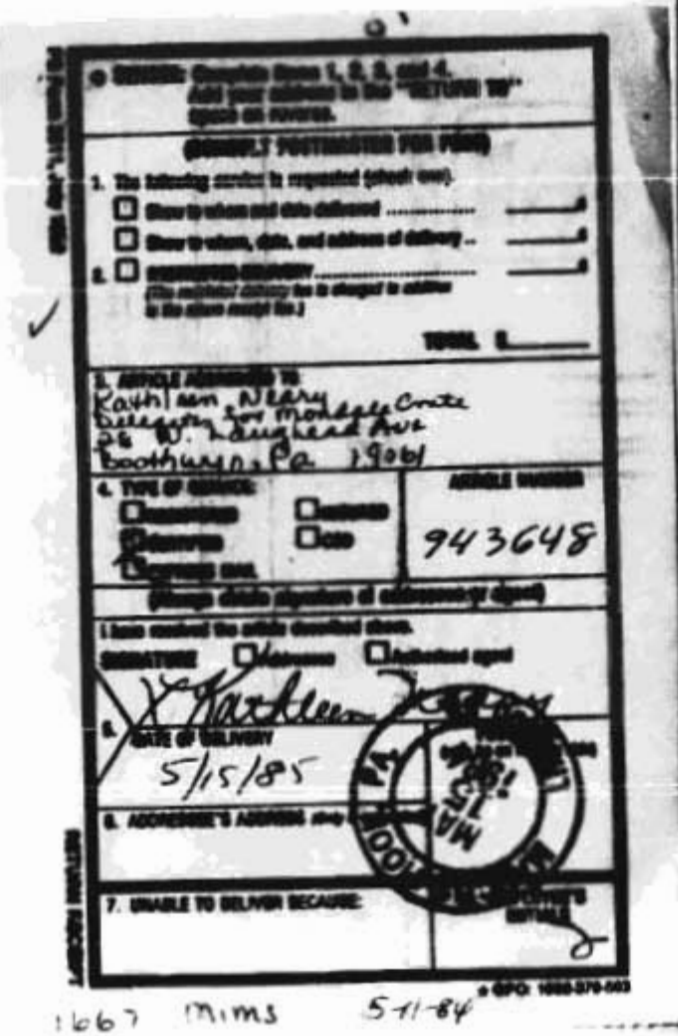
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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



1667 Mims 5-11-84

8504058

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SENECA AND O'DELL, P
ATTORNEYS AT LAW
335 NORTH MAIN STREET
WASHINGTON, PENNSYLVANIA 15301

GCC#4443

RECEIVED AT THE FEC
84 AUG 27 AM 8:34

DATE August 22, 1984

TO Stephen Mims, Esquire
Office of the General Counsel
Federal Election Commission
Washington, D.C. 20463

SUBJECT MUR 1704
22nd Congressional District
Delegates for Mo[illegible]

RECEIVED
GENERAL COUNSEL

Dear Mr. Mims;

Upon review of my entire file, I discovered that the type written April REport which I prepared with the name and address of the [illegible]WPAC in [illegible] was filed with the Pa. Elections Board on March 30, 1984.

As you recalled, I had spoken to you by phone prior to even receiving a Report form from your office. The purpose of that phone call was two-fold: a) to beadvised of what type of expenditures could be made in the name of our delegates and b) to have the Report forms sent to me as the FEC had failed to do so. With respect to the first item, once you gave me advice on publications, we decided not to do any advertising on the radio or newspaper whatsoever. With respect to the second, I finally received the forms on April 14, 1984 and they were due the nextday. Thus, I hand wrote them hurriedly and mailed them right then. In so doing, I inadvertently omitted the names of the two PAC contributions although I have referred to them in following correspondence and in phone calls with you. Obviously, I had no intention in omitting that information.

Therefore, I am willing to sign a conciliation with you as long as it specifically details the foregoing.

SIGNED

DEBRA O'DELL SENECA

QUICK LETTER

SENECA AND O'DELL, P.C.

ATTORNEYS AT LAW
336 NORTH MAIN STREET
WASHINGTON, PENNSYLVANIA 15301

DATE August 21, 1984

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

SUBJECT Report for 22nd Congressional District Delegate for Mondale
No. C00180166

AUG 27 P 1:4

RECEIVED
FEDERAL ELECTION COMMISSION
GENERAL COUNSEL

Dear Sirs;

Please findenclosed an AMENDED Report for the April 15, 1984 Quarterly Report in the above captioned matter. As you already know, I received the original forms late from your office and hurriedly filled them out to make your deadline. In so doing, I inadvertently omitted the names and addresses of the two contributions from UMWPAC and USWPAC which have been referred to by me in other correspondence and also, the Pa. State Filing Report.

Kindly file this with the proper docket at No. C00180166. Thank you.

Very truly yours,

SIGNED Deborah O'Dell Seneca
DEBORAH O'DELL SENECA

cc: Stephen Mims ✓

C00180166

SENECA AND O'DELL, P.C.
ATTORNEYS AT LAW
335 NORTH MAIN STREET
WASHINGTON, PENNSYLVANIA 15301

8504005037

STEPHEN MIMS, ESQUIRE
Office of the General Counsel
Federal Election Commission
Washington, D.C. 20463

RECEIVED AT THE FEC

84 AUG 23 A 9:08

SENECA AND O'DELL, P.C.
ATTORNEYS AT LAW
335 NORTH MAIN STREET
WASHINGTON, PENNSYLVANIA 15301

ANTHONY J. SENECA
DEBBIE O'DELL

TELEPHONE 228-7777
228-1670

GCC #4416

August 21, 1984

Stephen Mims, Esquire
Office of the General Counsel
Federal Election Commission
Washington, D.C. 20463

Re: MUR1704
22nd Congressional
District Delegate Committee for Mondale (PA)

Dear Mr. Mims;

This is to confirm our telephone conversation of this date relative to the above captioned matter. I have enclosed a copy of the amended Report for the April 15 Quarterly which inadvertently left out the names and addresses of the two contributions for that period.

I trust that this will correct the violation referred to in the letter of Lee Ann Elliott dated August 14, 1984. Thank you for your assistance in this matter.

The original Report has been filed with the FEC per your instructions.

Very truly yours,
SENECA & O'DELL, P.C.

DEBBIE O'DELL SENECA

DOD/aa

84 AUG 23 A10:10

GENERAL COUNSEL

8504005033

AMENDED

REPORT OF RECEIPTS AND DISBURSEMENTS

For a Political Committee Other Than an Authorized Committee

(Summary Page)

ALLEN AREA

1. Name of Committee (In Full)

22nd Congressional District Delegates for Mondale

Address (Number and Street)

335 N. Main Street

City, State and ZIP Code

Washington, Pa. 15301

☐ Check here if address is different than previously reported.

2. FEC Identification Number

3. ☒ This committee qualified as a multicandidate committee during this Reporting Period on March 20, 1984 (Date)

4. TYPE OF REPORT (Check appropriate block)

(a) ☒ April 15 Quarterly Report ☐ October 15 Quarterly Report

☐ July 15 Quarterly Report ☐ January 31 Year End Report

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

☐ Monthly Report for _____

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

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

☐ Termination Report

(b) Is this Report an Amendment?

☒ YES ☐ NO

SUMMARY	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period March 20 1984 through April 15, 1984		
6. (a) Cash on hand January 1, 19 84		$ —0—
(b) Cash on Hand at Beginning of Reporting Period	$ —0—	
(c) Total Receipts (from Line 16)	$ 7,000.00	$ 7,000.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ 7,000.00	$ 7,000.00
7. Total Disbursements (from Line 28)	$ 4,792.25	$ 4,792.25
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 2,207.75	$ 2,207.75
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)	$ —0—	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	$ —0—	

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

DEBBIE O'DELL SENECA

Type or Print Name of Treasurer

Debbie O'Dell Seneca August 21, 1984

SIGNATURE OF TREASURER Date

For further information contact:
Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4068

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

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

FEC FORM 3X (3/80)

85040500589

ITEMIZED RECEIPTS

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

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

Name of Committee (In Full)
22nd Congressional District Delegates forMondale

	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
A. Full Name, Mailing Address and ZIP Code United Mineworkers of America Political Action Fund Washington, D.C.	N/A	March 23 1984	$5,000.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation N/A		
	Aggregate Year-to-Date—$5,000.00		
B. Full Name, Mailing Address and ZIP Code United Steelworkers of America Political Action Fund 5 Gateway Center Pittsburgh, Pa. 15222	Name of Employer N/A	Date (month, day, year) April 9, 1984	Amount of Each Receipt This Period $2,000.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation N/A		
	Aggregate Year-to-Date—$2,000.00		
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation		
	Aggregate Year-to-Date—$		
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation		
	Aggregate Year-to-Date—$		
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation		
	Aggregate Year-to-Date—$		
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation		
	Aggregate Year-to-Date—$		
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation		
	Aggregate Year-to-Date—$		
SUBTOTAL of Receipts This Page (optional)			
TOTAL This Period (last page this line number only)			$7,000.00

8504050059

SENECA AND O'DELL, P.C.
ATTORNEYS AT LAW
335 NORTH MAIN STREET
WASHINGTON, PENNSYLVANIA 15301

PITTSBURGH, PA
PM
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84 AUG 23 AM 10

STEPHEN MIMS, ESQUIRE
Office of the General Counsel
Federal Election Commission

Washington, D.C. 20463

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84 JUN 12 A8:57

SENECA AND O'DELL, P.C.
ATTORNEYS AT LAW
335 NORTH MAIN STREET
WASHINGTON, PENNSYLVANIA 15301

ANTHONY J. SENECA
DEBBIE O'DELL

TELEPHONE 225-7777
225-1670

June 6, 1984

84 JUN 12 A10:23

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

In re: In the matter of the Complaint of Americans with Hart, Inc., vs. Mondale for President, Inc.
M.U.R. 1667

✓ The National Right to Work Committee, et al vs. Walter F. Mondale, et al
M.U.R. 1704

8504050592

Dear Sirs:

Please consider this letter an Answer to the above captioned Complaints. Since the additional Complaints were improperly filed, I will not respond to same.

After reviewing all of the documentation in the above two captioned cases, it is apparent that our Delegate Committee being the 22nd Congressional District Delegates for Mondale, is not a named Defendant in either and thus, need not enter a defense. However, as Treasurer for that Delegate Committee, I would like to merely respond by saying that the Committee was formed for the specific purpose to elect six delegates and two alternate delegates to the 1984 National Democratic Convention in San Francisco. All monies expended by this Delegate Committee were made for that purpose and the remaining amount is to be spent to help defray the costs of these elected people to attend the Convention.

At no time was money expended for advertising, particularly newspapers, radio announcements and television since same is prohibited by The Federal Election Law. The members of our Delegate Committee worked together in all five counties to see that each and every member of our committee was elected and that our monies were expended for this purpose. By reading of The Federal Elections Code and Regulations which were sent to me by your office, the expenditures were permitted and we did not commit any willful or known violation of The Federal Elections Act.

Very truly yours,

SENECA & O'DELL, P.C.

BY Debbie O'Dell Seneca
DEBBIE O'DELL SENECA, Treasurer

dod/aa
cc: Kenneth A. Gross, Assoc. General Counsel

SENECA AND O'DELL, P.C.
ATTORNEYS AT LAW
335 NORTH MAIN STREET
WASHINGTON, PENNSYLVANIA 15301

PITTSBURGH, PA 152
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8 JUN
1984
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FEDERAL ELECTIONS COMMISSION
1325 K Street, N.W.
Washington, D.C. 20463

RECEIVED AT THE FEC
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SENECA AND O'DELL, P.C.
ATTORNEYS AT LAW
330 NORTH MAIN STREET
WASHINGTON, PENNSYLVANIA 15301

ANTHONY J. SENECA
DEBBIE O'DELL

TELEPHONE 225-7777
225-1070

June 6, 1984

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

In re: In the matter of the Complaint of Americans with Hart, Inc., vs. Mondale for President, Inc.
M.U.R. 1667

The National Right to Work Committee, et al vs. Walter F. Mondale, et al
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SENECA & O'DELL, P.C.

BY Debbie O'Dell Seneca
DEBBIE O'DELL SENECA, Treasurer

dod/aa
cc: Kenneth A. Gross, Assoc. General Counsel

8504050059 4

SENECA AND O'DELL, P.C.
ATTORNEYS AT LAW
335 NORTH MAIN STREET
WASHINGTON, PENNSYLVANIA 15301



84 JUN 13 PM 12:

Kenneth A. Gross, Assoc. General Counsel
Federal Elections Commission
1325 K Street, N.W.
Washington, D.C. 20643

RECEIVED AT THE FEC
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84 JUN 12 A8:57

SENECA AND O'DELL, P.C.
ATTORNEYS AT LAW
335 NORTH MAIN STREET
WASHINGTON, PENNSYLVANIA 15301

ANTHONY J. SENECA
DEBBIE O'DELL

TELEPHONE 228-7777
228-1670

June 6, 1984

84 JUN 12 A10:23

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

In re: In the matter of the Complaint of Americans with Hart, Inc., vs. Mondale for President, Inc.
M.U.R. 1667

The National Right to Work Committee, et al vs. Walter F. Mondale, et al
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Very truly yours,

SENECA & O'DELL, P.C.

BY Debbie O'Dell Seneca
DEBBIE O'DELL SENECA, Treasurer

dod/aa
cc: Kenneth A. Gross, Assoc. General Counsel

8504050526

FEDERAL ELECTION COMMISSION
WASHINGTON D C 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Debbie O'Dell Seneca, Treasurer
22nd Congressional District
Delegate Committee for Mondale
335 North Main Street
Washington, PA 15301

Re: MUR 1667

Dear Ms. Seneca:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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If you intend to be represented by counsel in this matter please advise the Commission by 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.

8504050597

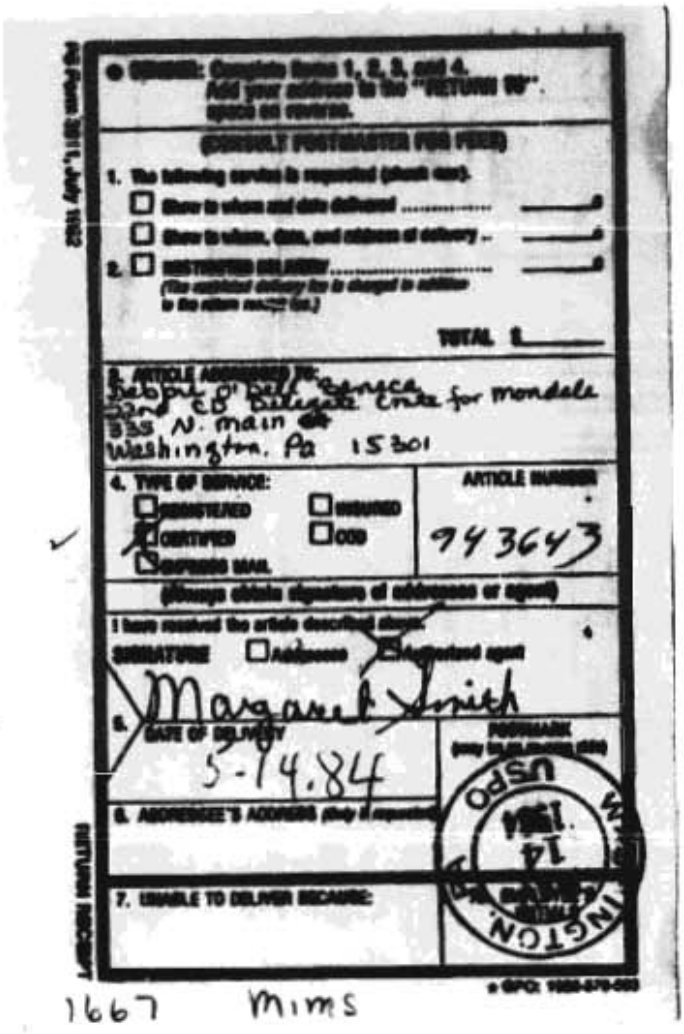
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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



1667 Mims

8500405

RECEIVED AT THE FEC
GCC#3541
84 JUN 8 AM:11

June 4, 1984

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

IN RE: MUR 1704

Dear Attorney Stephen Mims:

In Response to the Complaint filed by The Right to Work Committee and Ralph Martin (Bud) Heetinga,Jr. VS Walter F. Mondale and Mondale for President Campgain Committee et al

We the Committee and muself as Treasurer of the 21st Congerssional District 1984 Delegates for Mondale have committed no violation of the Federal Election Campaign Act of 1971 as amended ("the Act")

Point of information for the Federal Elec tion Commission, in the Affidavit enclosed with the Complaint MUR 1704, it was stated that the identification of the Mondale Staff people was made by the wearing of a Gold Pin in the Shape of the Commonwealth of Pennsylvania with the name "Mondale" printed on it. This pin that they refer to was available to anyone who wanted to purchase them for either $2.00 or $3.00 at the AFL-CIO Convention held in Pittsburgh,Pennsykvania or from some of the Unions that were selling them. I myself purchased 6 of them to give to some of my friends. I know as a fact that at least four of the Delegates from the 21st Congressional District wore them all the time and are still wearing them.

Sincerely,

Dolores C Bross

Dolores C. Bross,Treasurer
21st Congressional District
1984 Delegates for Mondale

AFFIDAVIT:

June 4, 1984; I hereby swear that the above is true and correct to the best of my knowledge and belief.

Sworn before me this 4th day
of June, 1984

Edna Greene

DEPUTY PROTHONOTARY
My Commission Expires First Mon. in Jan., 1988

8504050059 7

Dolores Bross
2807 Oakwood Street
Erie, Pennsylvania

RETURN RECEIPT REQUESTED

CERTIFIED

P 530 218 918

MAIL

Att: Attorney Stephen Mins





84 JUN 4 AM 10:

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

RECEIVED AT THE FEC
Ca# 3633

May 21, 1984 84 JUN 15 P12:22

Atty. Stephen Mims:
Federal Election Commission
1325 K. Street N.W.
Washington, D.C. 20463

IN RE: MUR 1667

Dear Atty Mims:

The 21st Congressional Delegate Committe 1984 Delegates for Mondale and my self as Treasure, have not violated any of the Federal Election Campaign Act of 1971.

We therefore feel no action should be taken against the committee or myself as Treasurer.

The monies given to our committee was received in March, long before the Suit was filed by the Hart People.

The monies received by our committee was used strickly to help elect the 5 delegates and the two alternates. None of the monies was used for any other purpose. Candidate Mondale received none of the $3750.00 that we received.

The reason we have not terminated our committee, is that we are waiting for a final bill from General Telephone Company, as soon as that is received we shall terminate our committee.

Sincerely,

Dolores Bross

Dolores Bross, Treasurer
21st Congressional District
1984 Delegates for Mondale.

8504500601

May 21, 1984: I hereby certify that the statement above are true and correct to the best of my knowledge and belief.

Dolores Bross

Sown before me this 21st day
of May, 1984

Betty Stevens

NOTARY PUBLIC
My Commission Expires First Mon. in Jan., 1988

Dolores C. Bross
2807 Oakwood Street
Erie, Pennsylvania

0 6 3

ERIE, PA 165 W
PM
21 MAY
1984

84 JUN

RETURN RECEIPT
REQUESTED

Attorney Stephen Mims
Federal Election Commission
1325 K Street N.W.
Washington, D.C. 10463

CERTIFIE
P 530 216
MAIL

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Dolores C. Bross, Treasurer
21st Congressional District 1984
Delegates for Mondale
2807 Oakwood Street
Erie, PA 16508

Re: MUR 1667

Dear Ms. Bross:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

8504050060 3

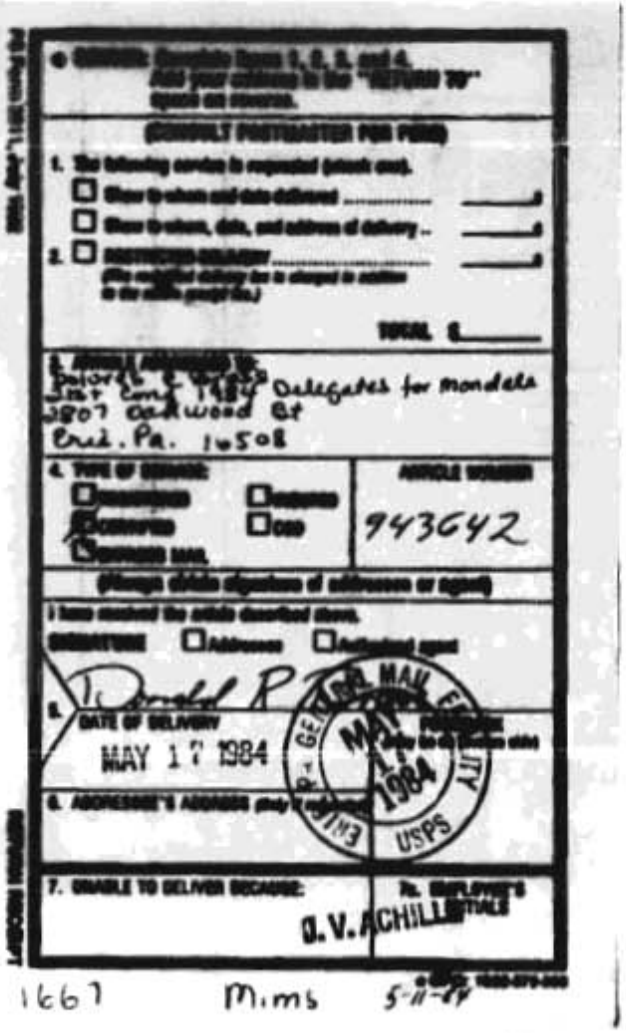
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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



1667 Mims 5-11-84

8574005060 1

GCC 3652
RECEIVED BY THE FEC
84 JUN 18 A8:46
84 JUN 18 A10:45

1032 S. Braddock Ave.
Pittsburgh, PA 15218

June 12, 1984

Kenneth A. Gross, Associate General Counsel
Federal Election Commission
Washington, DC 20463

Re: MUR 1704

Dear Mr. Gross,

This is in response to a letter from you dated May 29, 1984. Because neither the Mondale Delegates-20th District Committee, of which I am treasurer, nor the organizations which donated to our compaign are mentioned in the complaint, I am not responding at this time. However, we reserve the right to respond at a future date if it becomes necessary.

Sincerely,

Kathleen Smith

Kathleen Smith, Treasurer
Mondale Delegates-20th District

8504005006 05

1032 S. Braddock Ave
Pgh PA 15218



Kenneth A. Gross, Associate General Co
Federal Election Commission
Washington DC 20463

FEC 4053006

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Kathleen Smith, Treasurer
Mondale Delegates - 20th
District
1032 S. Braddock Avenue
Pittsburgh, PA 15218

Re: MUR 1667

Dear Ms. Smith:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

8504500607

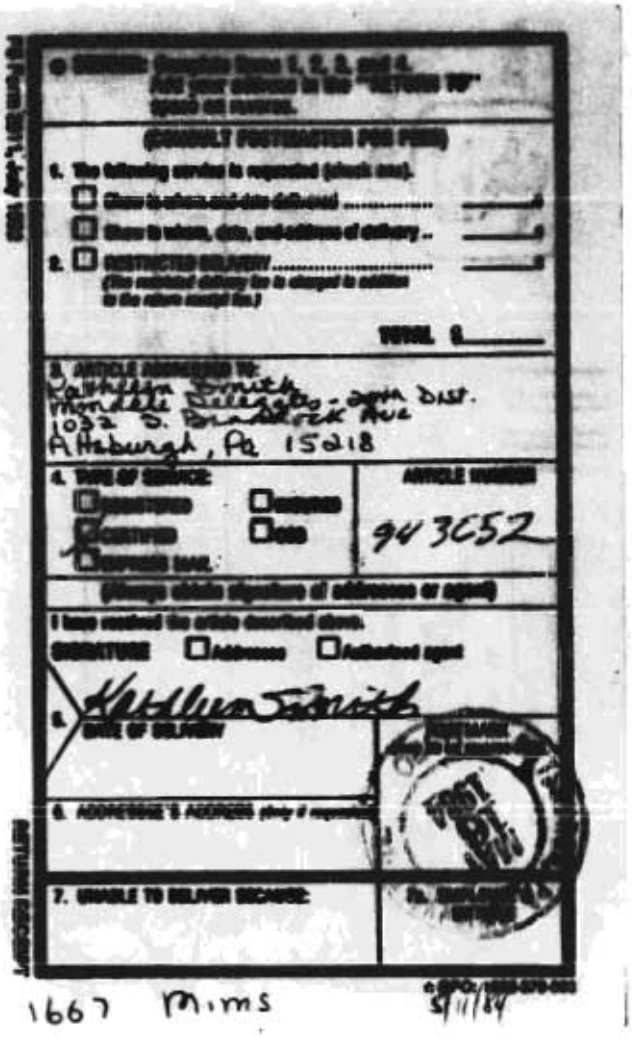
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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



RECEIVED AT THE FEC
GCC #3409
84 MAY 1 A10:57

PEPPER, HAMILTON & SCHEETZ
ATTORNEYS AT LAW

1777 F STREET, N.W.
WASHINGTON, D.C. 20006
202-842-0100

10 SOUTH MARKET SQUARE
HARRISBURG, PA 17108
717-255-1155

100 RENAISSANCE CENTER
DETROIT, MI 48243
313-259-7110

20TH FLOOR
THE FIDELITY BUILDING
123 SOUTH BROAD STREET
PHILADELPHIA, PENNSYLVANIA 19109
215-563-5000
CABLE ADDRESS "PEPFIL PHILADELPHIA"
TELECOPIER (#488) 215-732-0038 · (#600) 215-568-0804
DEX (#2100) 215-545-3477 · TWX 710-670-0777

606 SOUTH OLIVE STREET
LOS ANGELES, CA 90014
213-617-8181

618 HAMILTON STREET
ALLENTOWN, PA 18101
215-434-0104

SIX CORPORATE PARK DRIVE
WHITE PLAINS, NY 10604
914-694-4500

May 29, 1984

Stephen Mims
General Counsel's Office
Federal Election Commission
1325 K Street, N.W.
Washington, DC 20463

84 MAY 2 A3:08

Re: Americans with Hart, Inc. v. Mondale
for President Committee, Inc. MUR 1667

Dear Mr. Mims:

This letter is the response of the 19th Congressional District Delegates for Mondale Committee of Pennsylvania ("19th District Committee" or "Committee") to allegations contained in the amended complaint filed with the Federal Election Commission ("FEC") by complainant Americans with Hart, Inc. ("Hart") against respondent Mondale for President Committee, Inc. ("MPC" or "Mondale campaign"). Because the 19th District Committee has no knowledge whatsoever regarding the activities of MPC or any delegate committee within or without Pennsylvania, this letter will respond only to those allegations that certain actions by the 19th District Committee were either illegal or created an affiliation between the 19th District Committee and MPC.

8504050069

When considering these allegations, it is important to keep in mind that the direct election of delegates in the April 10th Pennsylvania primary was a newly instituted election procedure. No connection existed between the success of Walter Mondale and the success of Mondale delegates. Presumably, then, many of the delegate candidates would have set up something akin to delegate committees without any encouragement from the Mondale campaign.

I. Staffing

The 19th District Committee was made up of the four delegates and one alternate delegate candidates running in the primary and Ms. Louann Shrader as Treasurer. Ms. Shrader had no political connection to the Mondale campaign. Only those from the 19th District area were staff members. There were no disbursements to any staff members. No one on the Committee did anything upon orders from MPC or any other committee.

II. Contributions to the 19th District Committee

The 19th District Committee had a total of $86 in receipts, the bulk of which came from the contributions of two delegate candidates. The 19th District Committee received no money from MPC, the Pennsylvania At-large Delegates Committee ("PALC"), or any other political committee.

8504050610

III. Disbursements

The 19th District Committee spent a total of $227.21 on a few grassroots activities, including the purchase of buttons and some printing. The Committee also spent $50.00 for space in the program booklet distributed at the York County Democratic Dinner in late March. The Hart delegates also took out space in this booklet. No other "advertising" of any sort took place.

The 19th District Committee made no contributions to the Mondale national campaign, to PALC, or to any other delegate committee.

IV. Conclusion

For the reasons set forth in this response, the Commission should find no reason to believe that the 19th District Committee has violated the Federal Election Campaign Act.

Respectfully submitted,

PETER HEARN
JAMES M. BECK
Pepper, Hamilton & Scheetz
2001 The Fidelity Building
123 South Broad Street
Philadelphia, PA 19109
(215) 893-3000

Attorneys for LOUANN SHRADER,
TREASURER, 19TH DISTRICT COMMITTEE

8504050061

8504050012

PEPPER, HAMILTON & SCHEETZ
TWENTIETH FLOOR
THE FIDELITY BUILDING
PHILADELPHIA, PA. 19109

PHILADELPHIA PA MAY 23 U.S. POSTAGE 1.89

PEPPER, HAMILTON & SCHEETZ
ATTORNEYS AT LAW
2001 FIDELITY BUILDING
123 SOUTH BROAD STREET
PHILADELPHIA, PA. 19109

To

Stephen Mims, Esquire
General Counsel's Office
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

CERTIFIED
P 308 263 056
MAIL

FEC
84 MAY 25 A 9:57
FEC #3319

PEPPER, HAMILTON & SCHEETZ

ATTORNEYS AT LAW

1777 F STREET, N.W.
WASHINGTON, D.C. 20006
202-842-8100

10 SOUTH MARKET SQUARE
HARRISBURG, PA 17108
717-255-1155

100 RENAISSANCE CENTER
DETROIT, MI 48243
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215-893-3000
CABLE ADDRESS "PEPPIL PHILADELPHIA"
TELECOPIER (#465) 215-732-6028 · (#200) 215-988-9584
DEX (#4100) 215-546-3477 · TWX 710-670-1777

606 SOUTH OLIVE STREET
LOS ANGELES, CA 90014
213-617-8181

512 HAMILTON STREET
ALLENTOWN, PA 18101
215-434-0104

515 CORPORATE PARK DRIVE
WHITE PLAINS, NY 10604
914-694-4500

WRITER'S DIRECT DIAL NUMBER

(215) 893-3000

May 24, 1984

VIA FEDERAL EXPRESS

Stephen Mims, Esquire
General Counsel's Office
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: Americans with Hart, Inc. v. Mondale for President Committee, Inc., MUR 1667

Dear Mr. Mims:

Jim Beck and I have been approached by several Mondale district delegate committees in Pennsylvania and have been asked to represent them now that they have been served in the above-captioned matter. In addition to these committees mentioned in Jim's letters of May 18, we have received materials from three more such committees, the Third, Twelfth, and Nineteenth District Delegates for Mondale. We may receive materials from a number of others. Enclosed is a statement of designation of counsel for the Nineteenth District committee.

We do not know how many of these committees our firm will eventually represent, nor do we have any idea how long it will take for the necessary materials to reach us. Your mailings to the district committees appear to have been received on May 14 or 15, thereby making responses due on May 29 or 30.

8504005006 1 3

While we appreciate the Commission's general view regarding extensions, we believe that an extension, until June 15, for the responses of the Pennsylvania district delegate committees is warranted. In light of the peripheral involvement of the district committees in this matter, grant of the requested extension would not hinder the Commission's deliberations. This extension would allow us to ensure that any charges against the district delegate committees are responded to in a complete and orderly fashion even as to latecomers.

Thank you for your consideration of this request. Please advise me as soon as possible of the Commission decision.

Yours truly,

Susan M. Harrison

Susan M. Harrison

SMH/lk

Enclosure

8504050061 4

RECEIVED AT THE FEC
84 MAY 21 A8:38

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1667

NAME OF COUNSEL: Jim Beck and/or Peter Hearn of Pepper, Hamilton, & Sheetz

ADDRESS: 2001 Fidelity Building
123 South Broad Street
Philadelphia, PA 19109

TELEPHONE: (215) 893-3995

Merk 1667 Memo

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 15, 1984
Date

Louann Shrader
Signature

RESPONDENT'S NAME: Louann Shrader

ADDRESS: R.D. 5 Box 259 Oakhill Drive
Hanover, PA 17331

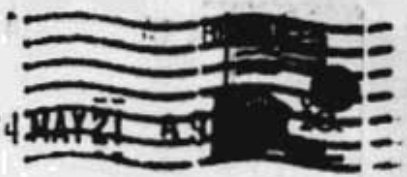
HOME PHONE: (717) 632-6023

BUSINESS PHONE: (717) 359-4146

8504050061 3

buann Shrader
.D. # Box 259
akhill DR
nover PA 17331

LANCASTER, PA 176
4 PM
15 MAY
1984



85040061

Federal Election Commission

1325 K Street, NW

Washington, DC 20463

HAND DELIVERED
84 MAY 25 A9:57

STATEMENT OF DESIGNATION OF COUNSEL

DA 10th

MUR 1667

NAME OF COUNSEL: Jim Beck and/or Peter Hearn of Pepper, Hamilton, & Sheetz

ADDRESS: 2001 Fidelity Building
123 South Broad Street
Philadelphia, PA 19109

TELEPHONE: (215) 893-3995

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May 15, 1984
Date

Louann Shrader
Signature

RESPONDENT'S NAME: Louann Shrader

ADDRESS: R.D. 5 Box 259 Oakhill Drive
Hanover, PA 17331

HOME PHONE: (717) 632-6023

BUSINESS PHONE: (717) 359-4146

RECEIVED MAY 21 1984

8504050061 7

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Louann Shrader, Treasurer
19th Congressional District
Delegates for Mondale Committee
RD 5 Box 2590akhill Drive
Hanover, PA 17331

Re: MUR 1667

Dear Ms. Shrader:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

8504050061 3

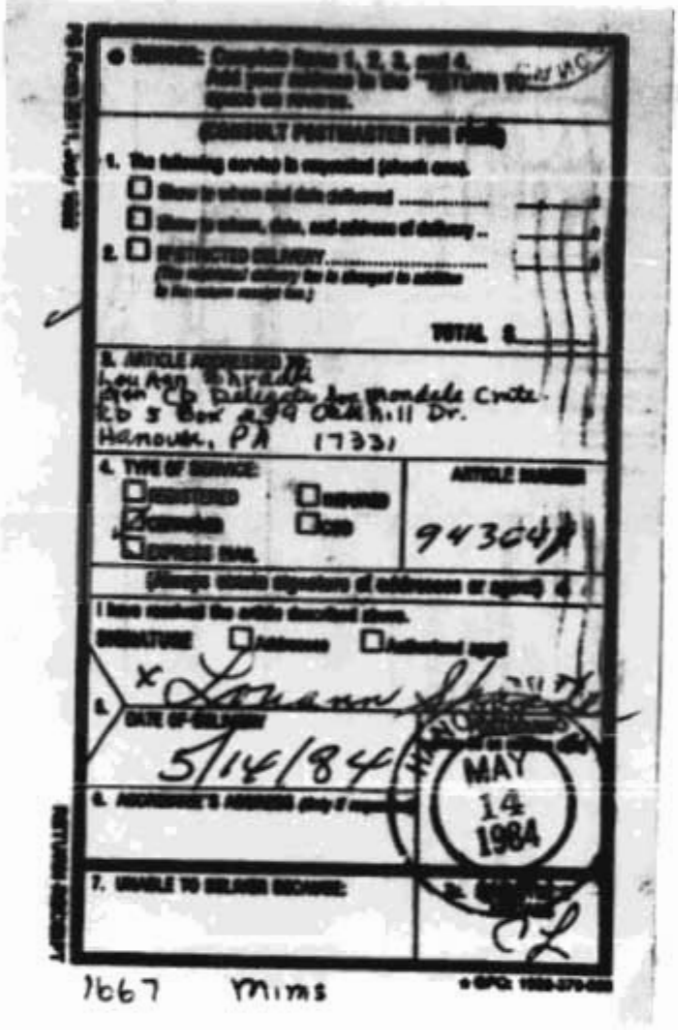
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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



BERKMAN RUSLANDER
POHL LIEBER & ENGEL

40th Floor, One Oxford Centre
Pittsburgh, Pennsylvania 15219-6498

ARTHUR J. ROONEY, II
(412) 392-2188

RECEIVED AT THE FEC
GCC#3508

June 1, 1984

Mr. Stephen Mims
Federal Election Commission
Washington, D.C. 20463

Re: MUR 1704

Dear Mr. Mims:

I have received a letter of this date from Kenneth Gross, Associate General Counsel, Federal Election Commission, indicating a Complaint has been filed with respect to the matter numbered MUR 1704. The envelop containing this correspondence was received in the mail room of our office and was signed by one of the staff people in the mail room. The person who signed acknowledging receipt of the envelop indicated that the package was opened when he received it. When the package reached my office the copy of the Complaint which was supposed to have been included was not contained in the envelop.

Please forward a copy of the Complaint in connection with this matter so that I might prepare an appropriate response. I would also request that the time for my response be extended until such time as I receive a copy of the Complaint.

If you have any questions, please contact the undersigned.

Truly yours,

Arthur J. Rooney II
for BERKMAN RUSLANDER POHL LIEBER & ENGEL

AJR:po
Enc.

8504050062 0

RECEIVED JUN 0 1 1984

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 29, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Art Rooney, II, Treasurer
PA 18th Congressional District
Delegates For Mondale
1 Oxford Ctr, 40th fl
Pittsburgh, PA 15219

Re: MUR 1704

Dear Mr. Rooney:

This letter is to notify you that on May 18, 1984 the Federal Election Commission received a complaint which alleges that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1704. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

8504500621

If you have any questions, please contact Stephen Nims, the staff member assigned to this matter at (202) 523-4143. 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

8504050062 2

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

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

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

8504050062 3

STATEMENT OF DESIGNATION OF COUNSEL

MUR _____

NAME OF COUNSEL: _____

ADDRESS: _____

_____

_____

TELEPHONE: _____

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

_____ _____

Date Signature

RESPONDENT'S NAME: _____

ADDRESS: _____

_____

_____

HOME PHONE: _____

BUSINESS PHONE: _____

8504050062 4

AJR
N RUSLANDER
EBER & ENGEL
Oxford Centre
ennsylvania 15219-6498

RECEIVED AT THE F
PITTSBURGH
JUN 04 1991
POSTAGE
PA

Mr. Stephen Mims
Federal Election Commission
Washington, D.C. 20463

RECEIVED AT THE FEC
Gen 3300
84 MAY 24 AM 10 55

BERKMAN RUSLANDER
POHL LIEBER & ENGEL

40th Floor, One Oxford Centre
Pittsburgh, Pennsylvania 15219-6498

May 23, 1984

ALAN A. GARFINKEL
(412) 392-2083

84 MAY 25 AM 12:44

EXPRESS MAIL

Stephen Mims, Esquire
Federal Election Commission
Washington, DC 20463

mms

Re: MUR 1667

Dear Mr. Mims:

Confirming our telephone conversation of this date, this Firm represents Art Rooney, II, Treasurer, PA 18th Congressional District Delegates For Mondale in connection with the Complaint filed against Mr. Rooney and the Committee.

We hereby formally request an extension of time until June 15, 1984 within which to respond to the Complaint. Mr. Rooney received the Complaint on May 16, 1984, and I have been unable to meet with my client until yesterday or marshall the facts and data necessary to respond to the allegations for the reason that I was in trial and Mr. Rooney has just recently returned from a business trip.

Accordingly, any consideration to this extension of time by the Commission will be appreciated and appears necessary at this time in order to prepare an adequate response.

I am enclosing Mr. Rooney's Statement of Designation of Counsel.

I shall await word from you.

Sincerely,

Alan A. Garfinkel
for BERKMAN RUSLANDER POHL LIEBER & ENGEL

AAG:pjp

Enclosure

8504050625

RECEIVED AT THE FEC

84 MAY 24 AM 9:35

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1667

NAME OF COUNSEL: Alan A. Garfinkel, Esq.
BERKMAN RUSLANDER POHL LIEBER & ENGEL

ADDRESS:

40th Floor, One Oxford Centre
Pittsburgh, PA 15219-6498

TELEPHONE: 412/392-2033

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.

5-23-84
Date

Signature

Art Rooney, II, Treasurer, PA 18th Congressional District Delegates For Mondale and PA 18th Congressional District Delegates For Mondale

RESPONDENT'S NAME:

ADDRESS: 40th Floor

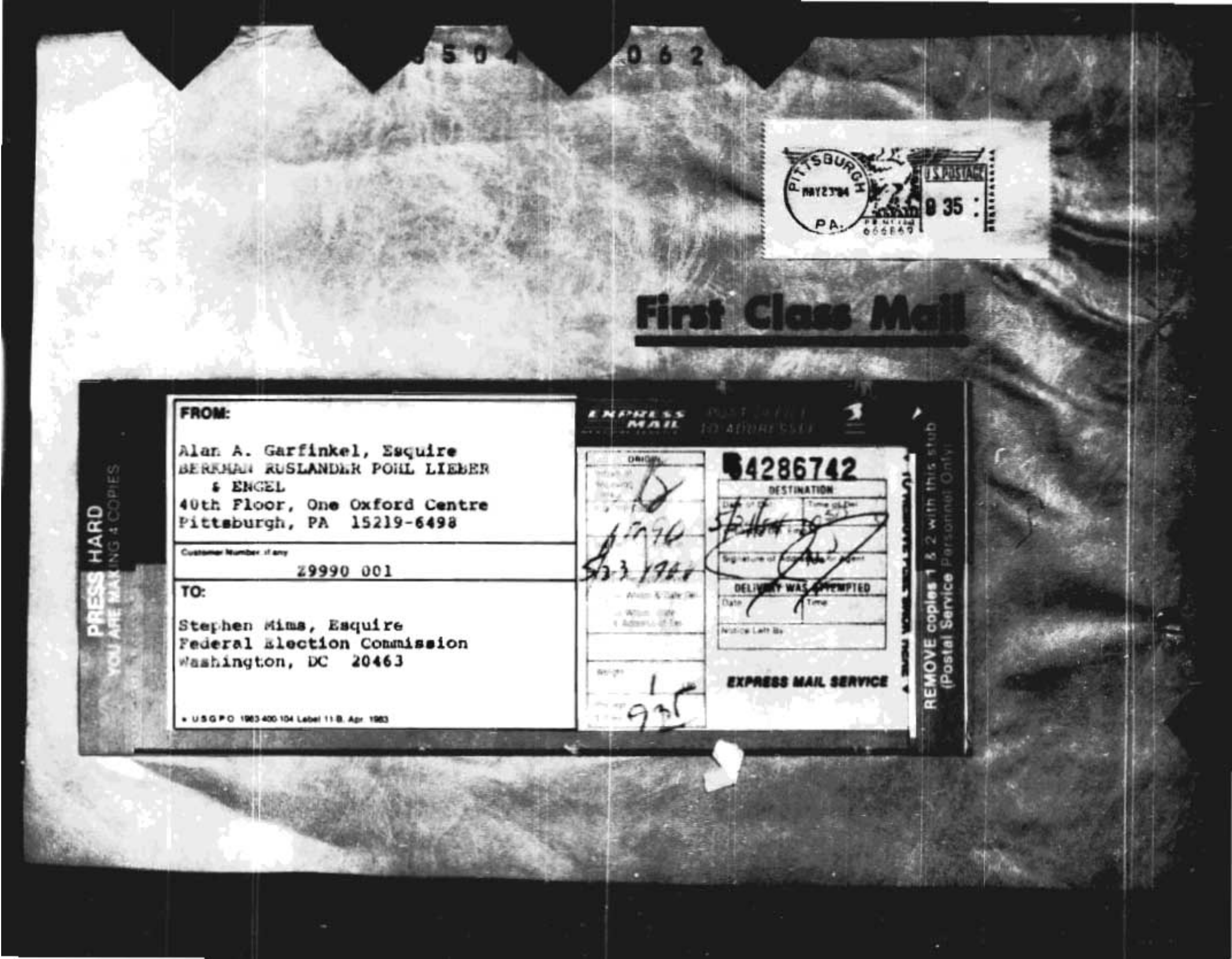
One Oxford Centre

Pittsburgh, PA 15219-6498

HOME PHONE: 412/561-7798

BUSINESS PHONE: 412/392-2138

8504050006 27


PITTSBURGH
PA.
U.S.POSTAGE
35
First Class Mail
PRESS HARD
YOU ARE MAKING 4 COPIES
FROM:
Alan A. Garfinkel, Esquire
BERKMAN RUSLANDER POHL LIEBER
& ENGEL
40th Floor, One Oxford Centre
Pittsburgh, PA 15219-6498
Customer Number if any
29990 001
TO:
Stephen Mims, Esquire
Federal Election Commission
Washington, DC 20463
EXPRESS MAIL
B4286742
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DELIVERY WAS ATTEMPTED
Date
Time
EXPRESS MAIL SERVICE
REMOVE copies 1 & 2 with this stub
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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Art Rooney, II, Treasurer
PA 18th Congressional District
Delegates For Mondale
1 Oxford Ctr, 40th fl
Pittsburgh, PA 15219

Re: MUR 1667

Dear Mr. Rooney:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

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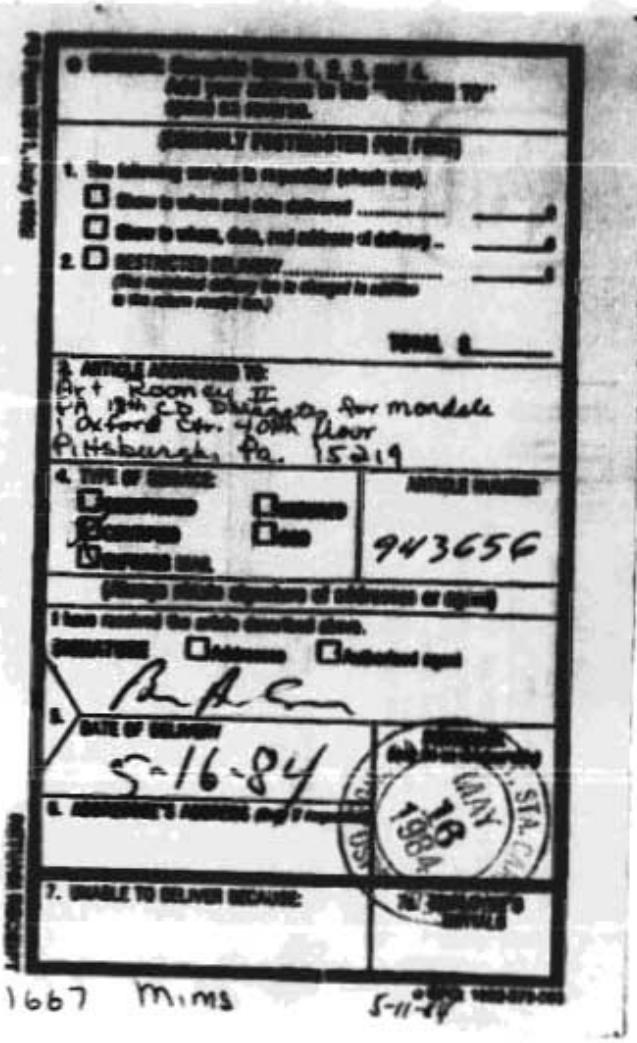
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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



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84 JUN 7 A8:46

FEC #2606

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1704

NAME OF COUNSEL: Pepper, Hamilton + Sheetz (Peter Herne + James Beck)

ADDRESS: 2001 Fidelity Building
123 S. Broad St.
Philadelphia PA 19103

TELEPHONE: 215-893-3995

84 JUN 7 A9:45

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.

6/3/84
Date

Susan D. Carle
Signature

RESPONDENT'S NAME: Susan Carle

ADDRESS: 1037 Maclay St.
Harrisburg PA 17103

HOME PHONE: 233-6022

BUSINESS PHONE: 232-5053

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4 JUN
1984

4 JUN

ZIP

Federal Election Commission
1325 K. St, N.W.
Washington DC 20463

Attn: Mr. Kenneth A. Gross

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GCC #3410
84 MAY 1 A10:56

PEPPER, HAMILTON & SCHEETZ
ATTORNEYS AT LAW

1777 F STREET, N.W.
WASHINGTON, D.C. 20006
202-842-0100

10 SOUTH MARKET SQUARE
HARRISBURG, PA 17108
717-255-1155

100 RENAISSANCE CENTER
DETROIT, MI 48243
313-259-7110

20th FLOOR
THE FIDELITY BUILDING
123 SOUTH BROAD STREET
PHILADELPHIA, PENNSYLVANIA 19109
215-568-3000
CABLE ADDRESS "PEPFIL PHILADELPHIA"
TELECOPIER (215) 732-6020 (215) 568-7584
DEX (215) 219 548-3427 TWX 710 670-0777

606 SOUTH OLIVE STREET
LOS ANGELES, CA 90014
213-617-8181

512 HAMILTON STREET
ALLENTOWN, PA 18101
215-434-0104

SIX CORPORATE PARK DRIVE
WHITE PLAINS, NY 10604
914-694-4500

May 29, 1984

Stephen Mims
General Counsel's Office
Federal Election Commission
1325 K Street, N.W.
Washington, DC 20463

84 MAY 2 A3:10

Re: Americans with Hart, Inc. v. Mondale
for President Committee, Inc., MUR 1667

Dear Mr. Mims:

This letter constitutes the response of the Pennsylvania 17th Congressional District Delegates for Mondale Campaign Committee ("17th District Committee" or "Committee") to the allegations contained in the amended complaint filed with the Federal Election Commission ("FEC") by complainant Americans with Hart, Inc. ("Hart") against respondent Mondale for President Committee, Inc. ("MPC" or "Mondale campaign"). The 17th District Committee has no firsthand information about the activities of MPC, Mondale delegate committees in other states, or other Mondale district delegate committees in Pennsylvania. Consequently, this submission will respond only to those charges alleging that certain actions of the 17th District Committee were either illegal or created an affiliation between the 17th District Committee and MPC.

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Before addressing these charges, a brief description of the Pennsylvania delegate selection procedures is necessary. The procedure in Pennsylvania for delegate selection in 1984 was vastly different from the previous system. In 1980 and before, delegates were apportioned in rough proportion to the popular vote received by presidential candidates in each congressional district. In 1984, however, delegates were directly elected. Thus no necessary connection existed between the success of Walter Mondale and the success of his pledged delegates. The appeal of Walter Mondale would not automatically translate into the election of his delegates. It is therefore probable that delegate committees of some sort would have been organized without encouragement from the Mondale campaign.

Hart's allegations should be examined in light of the character of Pennsylvania's delegate selection procedure.

I. Formation

The 17th District Committee was put together by a few local labor officials and activists on March 29, 1984, less than two weeks before the April 10th Pennsylvania primary. These union members had no previous connection to the Mondale campaign. The Committee received no advice from the Mondale campaign on how to organize, finance, or supervise its activities. Formation was prompted by information from union sources

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that Mr. Mondale's statewide strategy did not include assisting the election of individual delegates. Rather, responsibility for the organization and financing of all grassroots activities -- printing and distribution of slate ("palm") cards, leafletting, etc. -- fell entirely to the delegates. The FEC's regulations themselves confirm the propriety of such delegate-run activities. See 11 C.F.R. §110.13(d)(2)(i).

17th District Committee members were also informed on how to comply with federal regulations. Such assistance promoted compliance with federal election law since most members not only were unfamiliar with these regulations but were unaware that federal law was even applicable.

8504050063

II. Staffing; Activities

Considering its lack of familiarity with the new delegate selection procedure and its severe limitations on money and time, the 17th District Committee was fortunate to have the assistance of an experienced Mondale volunteer during the week before the primary. He was remunerated on a per diem subsistence basis. See Itemized Disbursements (attached as Exhibit "A"). Such payment by the Committee does not violate federal election law.

To what extent, if any, there was previous affiliation between this person and the Mondale campaign is not known.

Furthermore, MPC had absolutely no power or control over the members of the 17th District Committee. See 11 C.F.R. §100.5(g)(2)(ii). Ms. Susan Carle, Treasurer of the Committee, has had no connection to Mondale's campaign.

There has been no impermissible influence by MPC on any action of the 17th District Committee, and Hart points to none. All printed materials were designed by the Committee itself. The Committee did no public advertising. The Committee did not participate in any of MPC's advertisements. Speculation regarding the prior work history of one volunteer does not suffice to constitute "affiliation" between the 17th District Committee and MPC.

III. Contributions to the 17th District Committee

The 17th District Committee received a total of $1,075 in contributions. See Itemized Receipts (Exhibit "B"). None of these receipts was even questionable. In fact, the very acceptance of a "PAC" contribution demonstrates the independence of the 17th District Committee from the Mondale campaign, since such contributions were discouraged and shunned by MPC. In addition, it made perfect sense for the Committee to accept the labor union contribution since one of the delegates from the 17th District is a representative of an affiliate of that union.

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IV. Contributions by the 17th District Committee

The 17th District Committee made no contributions to the Mondale national campaign, to the state at-large committee, or to other district delegate committees, either within Pennsylvania or in other states.

V. Conclusion

For the reasons set forth in this response, the Commission should find no reason to believe that the 17th District Committee has violated the Federal Election Campaign Act.

Respectfully submitted,

PETER HEARN
JAMES M. BECK
Pepper, Hamilton & Scheetz
2001 The Fidelity Building
123 South Broad Street
Philadelphia, PA 19109
(215) 893-3000

Attorneys for SUSAN CARLE,
TREASURER, 17TH DISRICT COMMITTEE

8504050906737

SCHEDULE B **ITEMIZED DISBURSEMENTS**

Page ____ of ____ for
LINE NUMBER _____
(Use separate schedule(s) for each category of the Detailed Summary Page)

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

Name of Committee (in Full)
Pa. 17th Congressional District Delegates for Mondale

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Postmaster Harrisburg	mailing fees Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/3/84	49.29
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Sir Speedy 1005 Market St. Lemoyne 17043	printing Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/3/84	450.63
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Postmaster Harrisburg	mailing Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/5/84	26.30
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Excellent Inn 4123 N. Front St. Harrisburg 17110	Refreshments Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/13/84	75.00
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Bob Joy 2108 Chestnut St. Harrisburg 17104	travel, food + mileage expenses Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/5; 4/10; 4/11/84	459.00
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
SUBTOTAL of Disbursements This Page (optional)			1060.22
TOTAL This Period (last page this line number only)			1060.22

EXHIBIT "A"

8504100638

SCHEDULE A

ITEMIZED RECEIPTS

Page ____ of ____ for
LINE NUMBER ____
(Use separate schedule(s) for each category of the Detailed Summary Page)

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

Name of Committee (in Full)
Pa. 17th Congressional District Delegates for Mondale

A. Full Name, Mailing Address and ZIP Code SEIU COPE Political Campaign Committee 2020 K Street NW Washington DC 20006 Receipt For: X Primary ☐ General ☐ Other (specify):	Name of Employer 1000 Occupation Aggregate Year-to-Date-$ 1000	Date (month, day, year) 3/27/84	Amount of Each Receipt this Period 1000.00
B. Full Name, Mailing Address and ZIP Code Franklin Kury 240 N. 3rd St. Harrisburg 17101 Receipt For: X Primary ☐ General ☐ Other (specify):	Name of Employer Reed, Smith, Shaw and McClay Occupation Attorney Aggregate Year-to-Date-$ 50	Date (month, day, year) 4/8/84	Amount of Each Receipt This Period 50.00
C. Full Name, Mailing Address and ZIP Code Sarah Pearce 1309 Penn St. Harrisburg PA Receipt For: X Primary ☐ General ☐ Other (specify):	Name of Employer Central Susquehanna Intermediate Unit Occupation technical advisor Aggregate Year-to-Date-$ 25	Date (month, day, year) 4/8/84	Amount of Each Receipt This Period 25.00
D. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date-$	Date (month, day, year)	Amount of Each Receipt This Period
E. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date-$	Date (month, day, year)	Amount of Each Receipt This Period
F. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date-$	Date (month, day, year)	Amount of Each Receipt This Period
G. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date-$	Date (month, day, year)	Amount of Each Receipt This Period
SUBTOTAL of Receipts This Page (optional)			
TOTAL This Period (last page this line number only)			

EXHIBIT "B"

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PEPPER, HAMILTON & SCHEETZ
TWENTIETH FLOOR
THE FIDELITY BUILDING
PHILADELPHIA, PA. 19109



PEPPER, HAMILTON & SCHEETZ
ATTORNEYS AT LAW
2001 FIDELITY BUILDING
123 SOUTH BROAD STREET
PHILADELPHIA, PA. 19109

To

Stephen Mims, Esquire
General Counsel's Office
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

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84 MAY 24 A9:16

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1667

NAME OF COUNSEL: Pepper, Hamilton + Sheetz (Peter Herne + James Beck)

ADDRESS: 2001 Fidelity Bldg.
123 S. Broad St
Philadelphia PA 19103

TELEPHONE: 215-893-3995

mims

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.

5/21/84
Date

Susan D. Carle
Signature

RESPONDENT'S NAME: Susan Carle

ADDRESS: 1037 Maclay St
Harrisburg PA 17103

HOME PHONE: 233-6022

BUSINESS PHONE: 232-5053

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ngressional Mondale Delegates
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84 MAY 21

Federal Election Commission
Washington DC
20463

Attn: Stephen Mims

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PEPPER, HAMILTON & SCHEETZ

ATTORNEYS AT LAW

1777 F STREET, N.W.
WASHINGTON, D.C. 20006
202-842-8100

10 SOUTH MARKET SQUARE
HARRISBURG, PA 17108
717-255-1155

100 RENAISSANCE CENTER
DETROIT, MI 48243
313-259-7110

3000 TWO LOGAN SQUARE
18TH AND ARCH STREETS
PHILADELPHIA, PENNSYLVANIA 19103-2799
215-981-4000
CABLE ADDRESS "PEPHIL PHILADELPHIA"
TELECOPIER (215) 981-4750
DEX (215) 981-4750 · TWX 710-670-0777

600 SOUTH OLIVE STREET
LOS ANGELES, CA 90014
213-617-8151

840 HAMILTON STREET
ALLENTOWN, PA 18101
215-434-0104

312 CORPORATE PARK DRIVE
WHITE PLAINS, NY 10604
914-694-6800

WRITER'S DIRECT DIAL NUMBER
(215) 893-3995

17th PA.

May 18, 1984

MUR 1667
Mims

VIA FEDERAL EXPRESS

Stephen Mims, Esquire
General Counsel's Office
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: Americans with Hart, Inc. v. Mondale for President Committee, Inc., MUR 1667

Dear Mr. Mims:

I have been approached by several Mondale district delegate committees in Pennsylvania and have been asked to represent them now that they have been served in the above-captioned matter. To date, I have received materials from two such committees, the Fourth District Delegates for Mondale and the Pennsylvania Seventeenth Congressional District Delegates for Mondale. I am expecting materials from a number of others. Enclosed is a statement of designation of counsel for the Fourth District committee. The committee for the Seventeenth District forgot to fill out its statement, which will be forwarded to you as soon as it is received.

I do not know how many of these committees I or my firm will eventually represent, not do I have any idea how long it will take for the necessary materials to reach me. Your mailings to the district committees appear to have been received on May 14 or 15, thereby making responses due on May 29 or 30.

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While I appreciate the Commission's general view regarding extentions, I believe that an extention, until June 15, for the responses of the Pennsylvania district delegate committees is warranted. In light of the peripheral involvement of the district committees in this matter, grant of the requested extention would not hinder the Commission's deliberations. This extention would allow me to ensure that any charges against the district delegate committees are responded to in a complete and orderly fashion even as to latecomers.

Thank you for your consideration of this request. Please advise me as soon as possible of the Commission decision.

Yours truly,

James M. Beck

JMB/ms

Enclosure

8504050064 4

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Susan D. Carle, Treasurer
Pennsylvania 17th Congressional
District Delegates For Mondale
1037 Maclay Street
Harrisburg, PA 17103

Re: MUR 1667

Dear Ms. Carle:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

8504050643

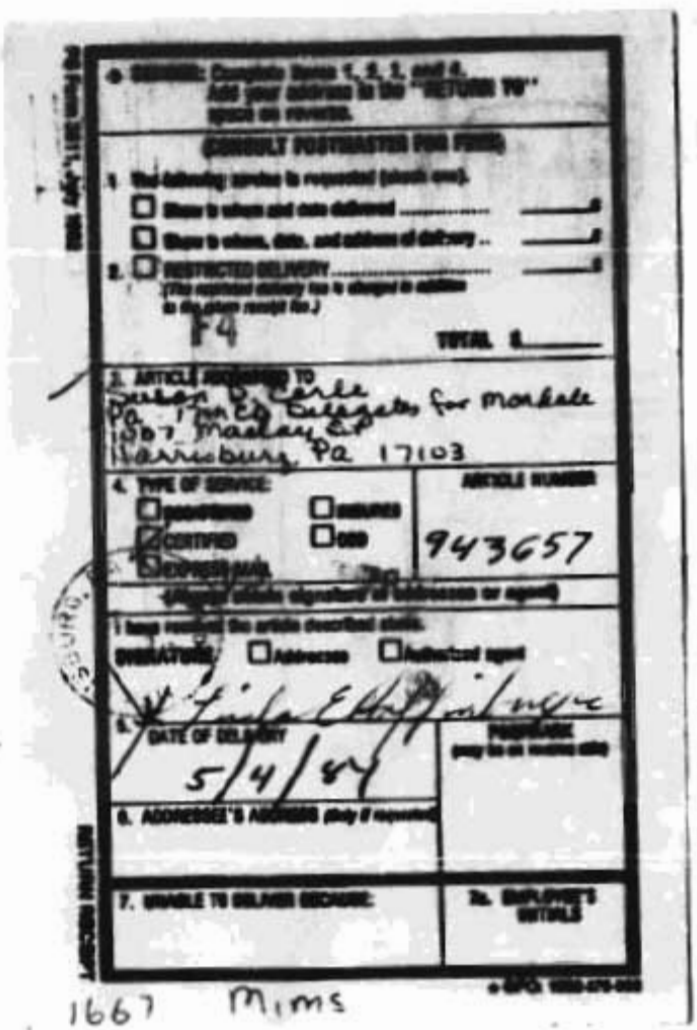
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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



RECEIVED AT THE FEC
Ccc# 3784
84 JUN 25 P12:30

Apartment #3
244 East Orange Street
Lancaster, Pa. 17602

Stephen Mims, Esquire
Federal Election Commission
Washington, D.C. 20463

Re: MUR 1704

Dear Mr. Mims:

I served as treasurer for the Walter Mondale Delegate Committee here in Lancaster County, Pennsylvania, which covers the 16th Congressional District. I am responding to MUR 1704 and your correspondence dated May 29, 1984. Although I am somewhat unclear as to what information or documentation the Commission requests, I can assure you that our Committee received absolutely nothing from any political action committees. In effect, essentially all the money raised by the Committee was donated by the delegates and myself. This amount would approximate $500.00. I do have in my possession various receipts regarding our expenditures, should you need them.

If you have any other questions, I would, of course, be happy to comply.

Very truly yours,

Philip B. Ebersole

PBE:sa

8504050064 7

. Ebersole
rtment #3
t Orange Street
caster, Pa. 17602

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HARRISBURG, PA
PM
21 JUN
1984

ALWAYS USE
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84 JUN 25

Stephen Mims, Esquire
Federal Election Commission
Washington, D.C. 20463

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Philip B. Ebersole, Treasurer
Delegate Committee for Mondale
16th Congressional District
Apartment #3
244 East Orange Street
Lancaster, PA 17602

Re: MUR 1667

Dear Mr. Ebersole:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

8524050064 9

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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

8504050065 0

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 19, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

15th C.D. Delegates for Mondale
4095 Tilghman Street
Allentown, PA 18104

Re: MUR 1704

Dear Sir or Madam:

This letter is to notify you that on May 18, 1984 the Federal Election Commission received a complaint which alleges that the committee and its treasuref, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1704. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

8 5 0 4 0 5 0 0 6 5 1

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. 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

8504050065 2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 30, 1984

James M. Beck, Esquire
Pepper, Hamilton & Scheetz
The Fidelity Building, 20th Floor
123 South Broad Street
Philadelphia, PA 19109

Re: MUR 1704
PA 14th Congressional District Delegates
For Mondale
Richard Brabender, as Treasurer

Dear Mr. Beck:

The Commission has previously notified you of complaints that it received on April 6, 1984, and May 18, 1984, in the above-captioned matter.

This is to notify you that on November 27, 1984, the Commission voted to take no further action with respect to you/your clients and close the file in this matter. Accordingly, the file will be made a part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within 10 days.

If you should have any questions, please contact Stephen Mims, an attorney assigned to this matter, at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

RECEIVED DEC 3 - 1984

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RECEIVED AT THE FEC
84 AUG 22 A10:46

PEPPER, HAMILTON & SCHEETZ

ATTORNEYS AT LAW

1777 F STREET, N.W.
WASHINGTON, D.C. 20006
202-842-8100

10 SOUTH MARKET SQUARE
HARRISBURG, PA 17108
717-255-1155

100 RENAISSANCE CENTER
DETROIT, MI 48243
313-259-7110

50TH FLOOR
THE FIDELITY BUILDING
123 SOUTH BROAD STREET
PHILADELPHIA, PENNSYLVANIA 19109-1099
215-563-2000
CABLE ADDRESS "PEPHIL PHILADELPHIA"
TELECOPIER (#486) 215-735-6030 · (#36001) 215-988-0884
DEX (#36001) 215-848-2477 · TWX 710-670-0777

606 SOUTH OLIVE STREET
LOS ANGELES, CA 90014
213-617-0151

510 HAMILTON STREET
ALLENTOWN, PA 18101
215-434-0104

SIX CORPORATE PARK DRIVE
WHITE PLAINS, NY 10604
914-694-4500

WRITER'S DIRECT DIAL NUMBER
(215) 893-3995

August 20, 1984

Stephen Mims, Esquire
General Counsel's Office
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 1667, 1704

Dear Steve:

Enclosed please find the letter which I received concerning the Pa. 14th Congressional District Delegates for Mondale. Please be advised that I do not represent this Committee.

Yours truly,

James M. Beck

JMB/bch

Enclosure

8504005063

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 16, 1984

James M. Beck, Esquire
Pepper, Hamilton & Scheetz
The Fidelity Building, 20th Floor
123 South Broad Street
Philadelphia, PA 19109

Re: MURs 1667 and 1704
PA 14th Congressional District
Delegates For Mondale
Richard Brabender, as Treasurer

Dear Mr. Beck:

You were previously notified of the Federal Election Commission's receipt of the complaints in MURs 1667 and 1704 alleging possible violations of the Federal Election Campaign Act, as amended. This is to advise you that on August 7, 1984, the Commission voted to merge MUR 1667 with MUR 1704. Accordingly, in all future correspondence, please reference MUR 1704 when addressing these matters.

If you should have any questions regarding this matter, please contact Stephen Mims, an attorney assigned to this matter, at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

by: Kenneth A. Gross
Associate General Counsel

RECEIVED AUG 20 1984

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PEPPER, HAMILTON & SCHEETZ
20TH FLOOR
THE FIDELITY BUILDING
123 SOUTH BROAD STREET
PHILADELPHIA, PA. 19109-1083



Stephen Mims, Esquire
General Counsel's Office
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Richard Brabender, Treasurer
PA 14th Congressional District
Delegates For Mondale
3411 Library Road
Pittsburgh, PA 15234

Re: MUR 1667

Dear Mr. Brabender:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

8504005067

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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

8504050063 9

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1704

NAME OF COUNSEL: Gerald Gornish

ADDRESS: 12th Floor Packard Bldg
Phila, PA 19102

TELEPHONE: 215-977-2198

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.

6/1/84
Date

Signature

RESPONDENT'S NAME: JOSEPH M MARKO

ADDRESS: 12th FL. PACKARD BLDG
PHILA. PA 19102

HOME PHONE: 215-667-3735

BUSINESS PHONE: 215-977-2198

8504050063 7

TWELFTH FLOOR-PACKARD BUILDING
PHILADELPHIA, PA. 19102

RECEIVED BY THE FEC
84 JUN 14 P1:03

June 12, 1984

Kenneth A. Gross, Esquire
Associate General Counsel
Federal Election Commission
Washington, DC 20463

Re: MUR 1704

Dear Mr. Gross:

I am in receipt of your letter dated May 29, 1984, and the attachments thereto. Since the materials attached raise no significantly different items than those that were sent to me in connection with matter #MUR 1667, I have enclosed herewith for your information a copy of my letter dated May 25, 1984 to Lawrence M. Noble, Deputy General Counsel, in connection with MUR 1667, as well as the attachments thereto, and would appreciate your accepting that letter as a response to the complaints in the subject matter.

I have also attached hereto a copy of a Statement of Designation of Counsel, wherein I have designated one of my partners, Gerald Gornish, as my counsel in case there are any further actions to be taken in this regard.

For the reasons stated in my letter to Mr. Noble, I similarly feel that no further actions should be taken with respect to this matter and that the file be closed.

I would appreciate your confirming receipt of this submission by signing and returning the extra copy of this letter in the enclosed self-addressed envelope, and in the meantime I am again submitting this letter and the enclosures in accordance with your offer of confidentiality.

Very truly yours,

Joseph M. Manko

JMM:lar
Enclosures
CERTIFIED MAIL - Return Receipt Requested

8504060630

TWELFTH FLOOR-PACKARD BUILDING
PHILADELPHIA, PA. 19102

June 12, 1984

Kenneth A. Gross, Esquire
Associate General Counsel
Federal Election Commission
Washington, DC 20463

Re: MUR 1704

Dear Mr. Gross:

I am in receipt of your letter dated May 29, 1984, and the attachments thereto. Since the materials attached raise no significantly different items than those that were sent to me in connection with matter #MUR 1667, I have enclosed herewith for your information a copy of my letter dated May 25, 1984 to Lawrence M. Noble, Deputy General Counsel, in connection with MUR 1667, as well as the attachments thereto, and would appreciate your accepting that letter as a response to the complaints in the subject matter.

I have also attached hereto a copy of a Statement of Designation of Counsel, wherein I have designated one of my partners, Gerald Gornish, as my counsel in case there are any further actions to be taken in this regard.

For the reasons stated in my letter to Mr. Noble, I similarly feel that no further actions should be taken with respect to this matter and that the file be closed.

I would appreciate your confirming receipt of this submission by signing and returning the extra copy of this letter in the enclosed self-addressed envelope, and in the meantime I am again submitting this letter and the enclosures in accordance with your offer of confidentiality.

Very truly yours,

Joseph M. Manko

JMM:lar
Enclosures
CERTIFIED MAIL - Return Receipt Requested

RECEIPT ACKNOWLEDGED: _____

3504005065 1

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1704

NAME OF COUNSEL: Gerald Gornish

ADDRESS: 12th Flor Packard Bldg
Phila, PA 19102

TELEPHONE: 215-977-2198

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.

6/1/84
Date

Signature

RESPONDENT'S NAME: JOSEPH M. MANKO

ADDRESS: 12th FL. PACKARD BLDG
PHILA. PA 19102

HOME PHONE: 215-667-3735

BUSINESS PHONE: 215-977-2198

8504030066?

TWELFTH FLOOR-PACKARD BUILDING
PHILADELPHIA, PA. 19102

May 25, 1984

Lawrence M. Noble
Deputy General Counsel
Federal Election Commission
Washington, DC 20463

Re: MUR 1667

Dear Mr. Noble:

This will acknowledge receipt on May 16, 1984 of your letter dated May 11, 1984 notifying me that complaints had been filed by Americans with Hart, Inc. alleging possible violations by a Mondale delegate committee, of which I serve as treasurer, of the Federal Election Campaign Act of 1971 (the "Act"). By submission of this letter, which I have prepared solely on my own without any communication with the national Mondale organization or any other delegate committee, I am availing myself of the opportunity afforded to me to demonstrate that no action should be taken against the committee or me in connection with this matter.

I have read carefully the copy of the complaint and supplements which were enclosed with your May 11 letter, which charge (1) improper evasion of spending limits through the use of the delegate committees, (2) improper acceptance of PAC contributions beyond permitted limits, and (3) affiliation among Mondale delegate committees and with the national Mondale organization.

For the reasons set forth below, it is my belief that the activities of my committee, in general, and myself, as treasurer, do not fall within the ambit of such charges or violate the Act, and accordingly no action should be taken by the Commission against the committee or me.

Background

As to the origin of our committee, once I was advised in late January or early February that I had been endorsed by the Mondale organization to run as a candidate for delegate to the Democratic National Convention this July for Pennsylvania's 13th Congressional District (the "District"), I spoke with one other similarly nominated candidate, Penny Gerber, as to what efforts we should make to enhance our chances of being elected. As an elected commissioner in Lower Merion Township, I felt that I would have a good

File

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opportunity to gain support for all four Mondale nominees in the District, and Mrs. Gerber and the other two endorsed nominees in their areas within the District.1/ Mrs. Gerber and I agreed that we would stand a much better chance of being elected if we could get our names before the registered voters in the District, and it would be advisable to raise enough money to print "palm" cards to distribute on primary election day (April 10). We agreed to attempt to cover the expenses of printing these palm cards and get volunteers to distribute them at the polling places on election day.

Shortly thereafter, standard forms were sent out by the national Mondale organization to all endorsed delegates as to the formation of delegate committees. Since the formation of such a committee appeared to us to be a proper manner in which to proceed within the requirements of the Act, Mrs. Gerber and I decided to form our committee. As a partner at a large law firm, which had an administrative staff and was located in the same building as First Pennsylvania Bank, I agreed to be treasurer. On the other hand, Mrs. Gerber agreed that a portion of her husband's law firm in Norristown could be made available to accommodate any paid or volunteer persons since Norristown was located at or near the center of the District.

I filed the necessary papers to form the delegate committee for the District, and subsequently filed the initial and final reports in a timely fashion. Shortly before the primary, when a number of students who had worked for one or more Mondale delegate committees in states with earlier primaries came to Pennsylvania to continue to help as unpaid volunteers, Mrs. Gerber advised me that several of these young people offered to assist us, four of whom2/ devoted several weeks prior to the primary in an effort to help elect the four endorsed delegates in the District. The names of these four individuals, as well as four other young people who rendered sporadic assistance right before the election, are listed in the campaign reports, copies of which are attached hereto.

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1. I never met Marilyn Horen, one of the other endorsed delegates, and only met Thomas Miller on two subsequent occasions, on neither of which we discussed the delegate committee or its activities.

2. Ann Lewis, John Dorgon, John Sutter and Cathy Schierman were the four principal volunteers. Ms. Lewis was "in charge."

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Independence of the Delegate Committee as to its Formation, Activities, Expenses and Receipts

Having read the complaint and supplements, the charges attack the "independence" of delegate committees and their activities from the national Mondale organization. Since our delegate committee operated in a totally autonomous manner, I have devoted the remainder of this response to distinguishing us and our activities from a number of other Mondale delegate committees alleged by Americans with Hart, Inc. to have been formed and/or operated in a non-autonomous manner. These distinctions appear in no special order of priority.

1. As indicated above, the decision to form and the formation of the committee, its composition and operation, and the filing of all reports were handled strictly by Mrs. Gerber and me, with no outside assistance or direction.

2. The two printers, the auto rental company and several other merchants with whom we dealt were all local, all were selected by us with no outisde assistance or direction, and all the committee's expenses were directed solely to our own election as delegates.

3. The palm cards we printed and distributed devoted almost all the space and prominence to our four names and ballot positions, with very little space devoted to Vice President Mondale and his ballot position. I have attached a copy of the palm cards given out in Montgomery County and Philadelphia County, parts of whose areas comprise the District. Thus, the primary emphasis was on the four delegate candidates and their ballot positions, rather than Vice President Mondale. These materials stand out in stark contrast to those described in the March 28, 1984 New York Post article, a copy of which was attached as an exhibit to the complaint. Our committee purchased no other materials; in fact, we did not even send a general mailing to the electorate, use handbills or any other election materials.

4. The palm cards were handed out by unpaid volunteers at the polling places, with the exception of the eight volunteers who received per diem reimbursement and whose names and amounts of such per diem reimbursement appear on the reports. Not only did we not purchase other materials, but in fact we had a great deal of difficulty finding sufficient Mondale literature to use prior to the election or at the polling places.

5. As to contributions, as the reports indicate, all contributions were from local individuals, many of whom were lawyers in or clients of Mrs. Gerber's husband's law firm or fellow attorneys in Norristown who work with Richard Gerber, except the two contributions that were made by the Pennsylvania At-Large Delegate Committee, chaired by Edward Rendell, the District Attorney in Philadelphia. Accordingly, we accepted no money from "political action committees" or labor unions; we raised funds at a grass roots (and obviously minimal) level, barely sufficient to cover the expenditures which we made (as shown in the reports).

6. As treasurer, I received no guidance from legal counsel for the national Mondale campaign or any other official for that matter in the conduct of the affairs of the delegate committee, other than the receipt of the initial forms as to the manner in which such a committee could be created. Thus, Mrs. Gerber and I conducted all efforts on our own behalf; we did not discuss any such efforts with any other delegate committees; I was and remain unaware of the people who comprised such other committees or even which districts in Pennsylvania have such committees. Other than the request that the At-Large Delegate Committee make the two small contributions it made to our delegate committee, there was no communication with that committee either as to the conduct of our efforts to be elected or otherwise.

7. Other than the small fund raising effort, all our committee did was (a) try to get people to distribute the palm cards after we had them printed, (b) meet with ward leaders and other Democratic officials in the District, and (c) help organize three events; viz, a small gathering hosted by my parents to hear Claude Pepper speak in support of Vice President Mondale, during which speech Representative Pepper indicated that we were running for delegates; Vice President and Mrs. Mondale's appearance at Bryn Mawr College; and Mrs. Mondale's appearance at the Trevose Inn in Feasterville. Mrs. Gerber's company provided a bus for the latter two events (as indicated in the reports).

Conclusion

Accordingly, from all I can deduce from the materials sent to me and my own reading of the various statutes and regulations, although we were a "delegate committee" under 11 CFR §110.14(b)(2), our contributions

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were proper, our expenditures autonomous and the whole conduct of our effort totally geared to the election of the four endorsed delegates with little or no effort made in support of Mondale and certainly no effort made to support any other delegate committees or delegates involved in Pennsylvania or elsewhere.

I have attached hereto my affidavit confirming under oath the veracity of the statements made in this letter. In accordance with your offer, I am submitting this letter in confidentiality in accordance with 2 U.S.C. §437g(a)(4)(B) and (12)(A) and accept your willingness to maintain it in that manner.

Finally, although I see no reason why there should be any further activity with regard to this matter, I have asked one of my partners, Gerald Gornish, to serve as my counsel and enclose a completed copy of the "Statement of Designation of Counsel".

I would appreciate your confirming receipt of this submission by signing and returning the extra copy of this letter in the enclosed self-addressed envelope. I would be happy to provide any further information you may find necessary in making your recommendation to the Commission, and urge you to concur with me and advise the Commission that the general complaint does not apply to our committee, no violation of the Act exists, and the file be closed.

Very truly yours,

Joseph M. Manko

JMM:lar
Enclosures

CERTIFIED MAIL/RETURN RECEIPT REQUESTED

8504050067

VERIFICATION

COUNTY OF PHILADELPHIA :
ss
COMMONWEALTH OF PENNSYLVANIA :

Joseph M. Manko, being duly sworn, deposes and says that he was the treasurer for the Mondale 13th Delegate Committee and is authorized on its behalf to submit the accompanying letter to the Federal Election Commission, and to the best of his knowledge and belief, said contents are true and correct.

Joseph M. Manko

Sworn to and subscribed
before me this 25th day
of May, 1984.

Notary Public

ROBIN L. LUMB
Notary Public, Phila., Phila. Co.
My Commission Expires Nov. 6, 1986

3504050063

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1667

NAME OF COUNSEL: Gerald Gornish, Esquire

ADDRESS: Wolf, Block, Schorr and Solis-Cohen
12th Floor Packard Building
Philadelphia, PA 19102

TELEPHONE: 215-977-2118

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.

5/25/84
Date

Signature

RESPONDENT'S NAME: Joseph M. Manko, Esquire

ADDRESS: 96 E. Levering Mill Road
Bala Cynwyd, PA 19004

HOME PHONE: 215-667-3735

BUSINESS PHONE: 215-977-2178

8520405006552

STATEMENT OF ORGANIZATION

(see reverse side for instructions)

(a) Name of Committee (in Full) — Check if name or address is changed	2. Date
Mondale 13th Delegate Committee	March 12, 1984
(b) Address (Number and Street)	3. FEC Identification Number
12th Floor, Packard Building	N/A
(c) City, State and ZIP Code	4. Is this an amended Statement? ☐ YES ☒ NO
Philadelphia, PA 19102	

5. TYPE OF COMMITTEE (check one):

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

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

Name of Candidate	Candidate Party Affiliation	Office Sought	State/District

☒ (c) This committee supports/opposes only one candidate Walter Mondale (name of candidate) and is NOT an authorized committee.

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

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

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

6. Name of Any Connected Organization or Affiliated Committee	Mailing Address and ZIP Code	Relationship
NONE		

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

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

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

Full Name	Mailing Address and ZIP Code	Title or Position
Mary McCullough	12th Floor, Packard Bldg.,Phila, PA 19102	

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

Full Name	Mailing Address and ZIP Code	Title or Position
Joseph M. Manko	12th Floor, Packard Bldg.,Phila,PA 19102	

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

Name of Bank, Depository, etc.	Mailing Address and ZIP Code
First PA Bank	15th and Chestnut Sts. Philadelphia, PA 19102

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

Joseph M. Manko — Type or Print Name of Treasurer

[signature] — SIGNATURE OF TREASURER

3/12/84 — Date

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

For further information contact: Federal Election Commission, Toll Free 800-424-9530, Local 202-523-4068

FEC FORM 1 (3/80)

850420670

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

(Summary Page)

ALIGN AREA | | ALIGN AREA

1. Name of Committee (In Full)

Mondale 13th Delegate Committee

Address (Number and Street)

12th Floor Packard Building
15th and Chestnut Streets

City, State and ZIP Code

Philadelphia, PA 19102

☐ Check here if address is different than previously reported.

2. FEC Identification Number
C00180711

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

4. TYPE OF REPORT (Check appropriate box(es))

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

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

SUMMARY	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period 3/27/84 through 3/31/84		
6. (a) Cash on hand January 1, 1984		$ -0-
(b) Cash on Hand at Beginning of Reporting Period 3/27/84	$ -0-	
(c) Total Receipts (from Line 18)	$1,600.00	$ 1,600.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$1,600.00	$ 1,600.00
7. Total Disbursements (from Line 28)	$1,330.98	$ 1,330.98
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 269.02	$ 269.02
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)	$ -0-	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	$ -0-	

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

Joseph M. Manko
Type or Print Name of Treasurer

Joseph M. Manko
SIGNATURE OF TREASURER

4/9/84
Date

For further information contact:
Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4068

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

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

FEC FORM 3X (3/80)

RECEIVED
APR 16
FEC MAIL CENTER

3 3 0 4 3 5 2 0 6 7 1

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

Name of Committee (In Full)	Report Covering the Period	
Mondale 13th Delegate Committee	From: 3/27/84	To: 3/31/84

	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date	
I. RECEIPTS			
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees	100.00	100.00	11(a)
(Memo Entry Unitemized $)			
(b) Political Party Committees	-0-	-0-	11(b)
(c) Other Political Committees	1,500.00	1,500.00	11(c)
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c))	1,600.00	1,600.00	11(d)
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES	-0-	-0-	12
13. ALL LOANS RECEIVED	-0-	-0-	13
14. LOAN REPAYMENTS RECEIVED	-0-	-0-	14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	-0-	-0-	15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	-0-	-0-	16
17. OTHER RECEIPTS (Dividends, Interest, etc.)	-0-	-0-	17
18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)	1,600.00	1,600.00	18
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES	1,330.98	1,330.98	19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES	-0-	-0-	20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	-0-	-0-	21
22. INDEPENDENT EXPENDITURES (use Schedule E)	-0-	-0-	22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. § 441 a(d)) (Use Schedule F)	-0-	-0-	23
24. LOAN REPAYMENTS MADE	-0-	-0-	24
25. LOANS MADE	-0-	-0-	25
26. REFUNDS OF CONTRIBUTIONS TO			
(a) Individuals/Persons Other Than Political Committees	-0-	-0-	26(a)
(b) Political Party Committees	-0-	-0-	26(b)
(c) Other Political Committees	-0-	-0-	26(c)
(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))	-0-	-0-	26(d)
27. OTHER DISBURSEMENTS	-0-	-0-	27
28. TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	1,330.98	1,330.98	28
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)	1,600.00	1,600.00	29
30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)	-0-	-0-	30
31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)	1,600.00	1,600.00	31
32. TOTAL OPERATING EXPENDITURES from Line 19	1,330.98	1,330.98	32
33. OFFSETS TO OPERATING EXPENDITURES from Line 15	-0-	-0-	33
34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)	1,330.98	1,330.98	34

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SCHEDULE A **ITEMIZED RECEIPTS**

Page 1 of 1 for Line Number 11A
(Use separate schedule(s) for each category of the Detailed Summary Page)

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

Name of Committee (In Full)
Mondale 13th Delegate Committee

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Joseph M. Manko 96 E. Levering Mill Road Bala Cynwyd, PA 19004	Wolf, Block, Schorr and Solis-Cohen	3/27/84	100.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation: Attorney Aggregate Year-to-Date—$ 100.00		
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation Aggregate Year-to-Date—$		
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation Aggregate Year-to-Date—$		
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation Aggregate Year-to-Date—$		
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation Aggregate Year-to-Date—$		
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation Aggregate Year-to-Date—$		
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation Aggregate Year-to-Date—$		
SUBTOTAL of Receipts This Page (optional)			100.00
TOTAL This Period (last page this line number only)			100.00

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SCHEDULE A **ITEMIZED RECEIPTS**

Page 1 of 1 for Line Number 3b.c.
(Use separate schedule(s) for each category of the Detailed Summary Page)

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

Name of Committee (in Full)
Mondale 13th Delegate Committee

A. Full Name, Mailing Address and ZIP Code At-Large Delegates for Mondale 1418 Walnut Street Philadelphia, PA 19102 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$ 1,500.00	Date (month, day, year) 3/27/84 3/29/84	Amount of Each Receipt this Period 1,000.00 500.00
B. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
C. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
D. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
E. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
F. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
G. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
SUBTOTAL of Receipts This Page (optional)			1,500.00
TOTAL This Period (last page this line number only)			1,500.00

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SCHEDULE B

ITEMIZED DISBURSEMENTS

Page 1 of 1 for LINE NUMBER 19
(Use separate schedule(s) for each category of the Detailed Summary Page)

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Name of Committee (in Full)
Mondale 13th Delegate Committee

	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Full Name, Mailing Address and ZIP Code Rent-A-Dent First & Governor Prince Blvd Lester, PA 19113	car rental Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	3/27/84	178.48
B. Full Name, Mailing Address and ZIP Code Matt Harvey 4811 Linscott Ave. Downer's Grove, IL 60515	per diem Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	3/28/84	126.00
C. Full Name, Mailing Address and ZIP Code Laura Tucker 1424 Judson Evanston, IL 60201	per diem Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	3/28/84	140.00
D. Full Name, Mailing Address and ZIP Code John Sutter 5155 Morgan Ave. S. Minneapolis, MN 55419	per diem Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	3/28/84	126.00
E. Full Name, Mailing Address and ZIP Code Janette Pittsford RR 2, Box 161 Middletown, IN 47356	per diem Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	3/28/84	126.00
F. Full Name, Mailing Address and ZIP Code Anne Lewis 55 East 86th Street New York, NY 10021	per diem Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	3/28/84	234.50
G. Full Name, Mailing Address and ZIP Code C.F.R. 1800 Hylton Street Pennsauken, NJ 08110	car rental Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	3/29/84	400.00
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			1,330.98
TOTAL This Period (last page this line number only)			1,330.98

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REPORT OF RECEIPTS AND DISBURSEMENTS
For [redacted]rsonal Committee Other Than an Authorized [redacted]mmittee

(Summary Page)

ALIGN AREA | | ALIGN AREA

1. Name of Committee (In Full)

Mondale 13th Delegate Committee

Address (Number and Street)

12th Floor Packard Building
15th and Chestnut Streets

City, State and ZIP Code

Philadelphia, PA 19102

☐ Check here if address is different than previously reported

2. FEC Identification Number
C00180711

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

4. TYPE OF REPORT (Check appropriate box(es))

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

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

SUMMARY	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period 3/31/84 through 5/18/84		
6. (a) Cash on hand January 1, 1984		$ -0-
(b) Cash on Hand at Beginning of Reporting Period	$ 269.02	
(c) Total Receipts (from Line 18)	$ 3,347.00	$ 4,947.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ 3,616.02	$ 4,947.00
7. Total Disbursements (from Line 28)	$ 3,616.02	$ 4,947.00
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ -0-	$ -0-
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)	$ -0-	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	$ -0-	

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

Joseph M. Manko
Type or Print Name of Treasurer

[signature]
SIGNATURE OF TREASURER

5/16/84
Date

For further information contact:
Federal Election Commission
Toll Free 800-424-9530
Local 202 523-4068

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

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

FEC FORM 3X (3/80)

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

Name of Committee (in Full): Mondale 13th Delegate Committee

Report Covering the Period: From 3/31/84 To 5/18/84

	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date	
I. RECEIPTS			
11. CONTRIBUTIONS (other than loans) FROM			
(a) Individuals/Persons Other Than Political Committees	3,347.00	3,447.00	11(a)
(Memo Entry Unitemized $_____)			
(b) Political Party Committees	-0-		11(b)
(c) Other Political Committees	-0-	1,500.00	11(c)
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c))	3,347.00	4,947.00	11(d)
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES	-0-	-0-	12
13. ALL LOANS RECEIVED	-0-	-0-	13
14. LOAN REPAYMENTS RECEIVED	-0-	-0-	14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	-0-	-0-	15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	-0-	-0-	16
17. OTHER RECEIPTS (Dividends, Interest, etc.)	-0-	-0-	17
18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)	3,347.00	4,947.00	18
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES	3,616.02	4,947.00	19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES	-0-	-0-	20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	-0-	-0-	21
22. INDEPENDENT EXPENDITURES (use Schedule E)	-0-	-0-	22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. §441 a(d)) (Use Schedule F)	-0-	-0-	23
24. LOAN REPAYMENTS MADE	-0-	-0-	24
25. LOANS MADE	-0-	-0-	25
26. REFUNDS OF CONTRIBUTIONS TO			
(a) Individuals/Persons Other Than Political Committees	-0-	-0-	26(a)
(b) Political Party Committees	-0-	-0-	26(b)
(c) Other Political Committees	-0-	-0-	26(c)
(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))	-0-	-0-	26(d)
27. OTHER DISBURSEMENTS	-0-	-0-	27
28. TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	3,616.02	4,947.00	28
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)	3,347.00	4,947.00	29
30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)	-0-	-0-	30
31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)	3,347.00	4,947.00	31
32. TOTAL OPERATING EXPENDITURES from Line 19	3,616.02	4,947.00	32
33. OFFSETS TO OPERATING EXPENDITURES from Line 15	-0-	-0-	33
34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)	3,616.02	4,947.00	34

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SCHEDULE A **ITEMIZED RECEIPTS**

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Name of Committee (in Full)
Mondale 13th Delegate Committee

	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
A. Full Name, Mailing Address and ZIP Code Lawrence T. Tornetta 833 East Germantown Pike Norristown, PA 19401	Tornetta Realty Occupation Realtor	4/4/84	200.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify)	Aggregate Year-to-Date-$200.00		
B. Full Name, Mailing Address and ZIP Code Mitchell W. Miller 1901 DeKalb Street Norristown, PA 19401	Name of Employer Miller & Turatsky Occupation Attorney	Date (month, day, year) 4/4/84	Amount of Each Receipt This Period 200.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify)	Aggregate Year-to-Date-$ 200.00		
C. Full Name, Mailing Address and ZIP Code Leonard A. Talone 825 Fayette Street Conshohocken, PA 19428	Name of Employer Wisler, Perlstein, Talone, Craig & Garrity Occupation Attorney	Date (month, day, year) 4/4/84	Amount of Each Receipt This Period 100.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify)	Aggregate Year-to-Date-$ 100.00		
D. Full Name, Mailing Address and ZIP Code S. Harrison Dogole 2503 Lombard Street Philadelphia, PA 19146	Name of Employer Globe Security Systems Occupation Businessman	Date (month, day, year) 4/6/84	Amount of Each Receipt This Period 500.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify)	Aggregate Year-to-Date-$ 500.00		
E. Full Name, Mailing Address and ZIP Code Gary Kleitman Suite 704, One Montgomery Plaza Norristown, PA 19401	Name of Employer Kleitman, Pincus, Haskins Occupation Attorney	Date (month, day, year) 4/9/84	Amount of Each Receipt This Period 50.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify)	Aggregate Year-to-Date-$ 50.00		
F. Full Name, Mailing Address and ZIP Code Andrew B. Cantor 515 Swede Street Norristown, PA 19401	Name of Employer Wisler, Perlstein, Talone, Craig & Garrity Occupation Attorney	Date (month, day, year) 4/9/84	Amount of Each Receipt This Period 100.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify)	Aggregate Year-to-Date-$ 100.00		
G. Full Name, Mailing Address and ZIP Code Arthur Poley 325 Sawmill Lane Horsham, PA	Name of Employer Arthur Poley Landscaping Occupation Landscaper	Date (month, day, year) 4/9/84	Amount of Each Receipt This Period 1,000.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date-$ 1,000.00		
SUBTOTAL of Receipts This Page (optional)			
TOTAL This Period (last page this line number only)			

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SCHEDULE A **ITEMIZED RECEIPTS**

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Name of Committee (in Full)
Mondale 13th Delegate Committee

A. Full Name, Mailing Address and ZIP Code Elliot Weinberg Receipt For: ☒ Primary ☐ General ☐ Other (specify)	Name of Employer Occupation Aggregate Year-to-Date—$25.00	Date (month, day, year) 4/12/84	Amount of Each Receipt this Period 25.00
B. Full Name, Mailing Address and ZIP Code Leon H. Fox, Jr. 6 Firethorne Circle Lafayette Hill, PA 19444 Receipt For ☒ Primary ☐ General ☐ Other (specify)	Name of Employer Occupation Aggregate Year-to-Date—$200.00	Date (month, day, year) 4/12/84	Amount of Each Receipt This Period 200.00
C. Full Name, Mailing Address and ZIP Code William H. Pugh 510 Swede Street Norristown, PA 19401 Receipt For ☒ Primary ☐ General ☐ Other (specify)	Name of Employer Kane, Pugh, Bonner, & Knoell Occupation Attorney Aggregate Year-to-Date—$200.00	Date (month, day, year) 4/12/84	Amount of Each Receipt This Period 200.00
D. Full Name, Mailing Address and ZIP Code Joseph M. Manko 96 E. Levering Mill Road Bala Cynwyd, PA 19004 Receipt For ☒ Primary ☐ General ☐ Other (specify)	Name of Employer Wolf, Block, Schorr & Solis-Cohen Occupation Attorney Aggregate Year-to-Date—$500.00	Date (month, day, year) 4/12/84	Amount of Each Receipt This Period 400.00
E. Full Name, Mailing Address and ZIP Code Frank Murphy Receipt For ☒ Primary ☐ General ☐ Other (specify)	Name of Employer Occupation Aggregate Year-to-Date—$100.00	Date (month, day, year) 4/12/84	Amount of Each Receipt This Period 100.00
F. Full Name, Mailing Address and ZIP Code Penny Gerber Suite 415, One Plymouth Meeting Plymouth Meeting, PA 19462 Receipt For: ☒ Primary ☐ General ☐ Other (specify)	Name of Employer PenDel Coach Lines, Inc. Occupation Businesswoman Aggregate Year-to-Date—$ 272.00	Date (month, day, year) 4/10/84	Amount of Each Receipt This Period 272.00 In-Kind Contribution
G. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
SUBTOTAL of Receipts This Page (optional)			
TOTAL This Period (last page this line number only)			3,347.00

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SCHEDULE B **ITEMIZED DISBURSEMENTS**

LINE NUMBER 19
(Use separate schedule(s) for each category of the Detailed Summary Page)

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

Name of Committee (in Full)

Mondale 13th Delegate Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Swift Print, Inc. 461 Bethlehem Pike Fort Washington, PA 19034	Printing Disbursement for ☒ Primary ☐ General ☐ Other (specify)	4/4/84	45.58
B. Full Name, Mailing Address and ZIP Code John Bergandino 801 Buttonwood Street Norristown, PA 19401	Purpose of Disbursement Signs Disbursement for ☒ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 4/4/84	Amount of Each Disbursement This Period 100.00
C. Full Name, Mailing Address and ZIP Code Kennedy Printing Co. 5534 Baltimore Ave. Philadelphia, PA 19143	Purpose of Disbursement Printing Disbursement for ☒ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 4/4/84 4/6/84 4/19/84	Amount of Each Disbursement This Period 300.00 281.94 262.88
D. Full Name, Mailing Address and ZIP Code John C. Dorgon 819 East Capital Street Washington, DC 20003	Purpose of Disbursement Per Diem Disbursement for ☒ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 4/6/84	Amount of Each Disbursement This Period 54.00
E. Full Name, Mailing Address and ZIP Code David Levine 297 LaMark Drive Amherst, NY 14226	Purpose of Disbursement Per Diem Disbursement for ☒ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 4/6/84	Amount of Each Disbursement This Period 54.00
F. Full Name, Mailing Address and ZIP Code Catherine Scheirman 1312 Connecticut Lawrence, KS 66044	Purpose of Disbursement Per Diem Disbursement for ☒ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 4/6/84	Amount of Each Disbursement This Period 54.00
G. Full Name, Mailing Address and ZIP Code Tommy Wells 913 Forest Drive Birmingham, AL 35209	Purpose of Disbursement Per Diem Disbursement for ☒ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 4/6/84	Amount of Each Disbursement This Period 54.00
H. Full Name, Mailing Address and ZIP Code Laura Tucker 1424 Judson Evanston, IL 60201	Purpose of Disbursement Travel Disbursement for ☒ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 4/10/84	Amount of Each Disbursement This Period 140.00
I. Full Name, Mailing Address and ZIP Code Ann Lewis 55 East 86th Street New York, NY 10021	Purpose of Disbursement Travel Disbursement for: ☒ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 4/10/84	Amount of Each Disbursement This Period 145.00
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			

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SCHEDULE B

ITEMIZED DISBURSEMENTS

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Name of Committee (in Full)
Mondale 13th Delegate Committee

	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Full Name, Mailing Address and ZIP Code Tommy Wells 913 Forest Drive Birmingham, AL 35209	Travel Disbursement for ☒ Primary ☐ General ☐ Other (specify)	4/10/84	26.50
B. Full Name, Mailing Address and ZIP Code John Sutter 5155 Morgan Ave. South Minneapolis, MN 55419	Travel Disbursement for ☒ Primary ☐ General ☐ Other (specify)	4/10/84	165.00
C. Full Name, Mailing Address and ZIP Code Matt Harvey 4811 Linscott Ave. Downer's Grove, IL 60515	Travel Disbursement for ☒ Primary ☐ General ☐ Other (specify)	4/10/84	40.00
D. Full Name, Mailing Address and ZIP Code David Levine 297 LaMark Drive Amherst, NY 14226	Travel Disbursement for ☒ Primary ☐ General ☐ Other (specify)	4/10/84	65.00
E. Full Name, Mailing Address and ZIP Code Catherine Scheirman 1312 Connecticut Lawrence, KS 66044	Travel Disbursement for ☒ Primary ☐ General ☐ Other (specify)	4/10/84	163.00
F. Full Name, Mailing Address and ZIP Code John C. Dorgon 819 East Capital Street Washington, DC 20003	Travel Disbursement for ☒ Primary ☐ General ☐ Other (specify)	4/10/84	26.50
G. Full Name, Mailing Address and ZIP Code Rent-A-Dent 1st and Governor Prince Blvd. Lester, PA 19113	Car Rental Disbursement for ☒ Primary ☐ General ☐ Other (specify)	4/11/84	130.60
H. Full Name, Mailing Address and ZIP Code Budget Rent-A-Car Swede & Georgetown Pike Norristown, PA 19401	Car Rental Disbursement for ☒ Primary ☐ General ☐ Other (specify)	4/11/84	370.00
I. Full Name, Mailing Address and ZIP Code Lane 1813 Ranstead Street Philadelphia, PA 19103	Printing Disbursement for ☒ Primary ☐ General ☐ Other (specify)	4/11/84	200.00
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			

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SCHEDULE B **ITEMIZED DISBURSEMENTS**

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)
Mondale 13th Delegate Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Coach Inn Motor Hotel 285 Commerce Drive Fort Washington, PA 19034	Catering Costs Disbursement for ☒ Primary ☐ General ☐ Other (specify)	4/12/84	124.47
B. Full Name, Mailing Address and ZIP Code	**Purpose of Disbursement**	**Date (month, day, year)**	**Amount of Each Disbursement This Period**
Cathy Schierman 1312 Connecticut Lawrence, KS 66044	Office Supplies Disbursement for ☒ Primary ☐ General ☐ Other (specify)	4/12/84	24.02
C. Full Name, Mailing Address and ZIP Code	**Purpose of Disbursement**	**Date (month, day, year)**	**Amount of Each Disbursement This Period**
Ann Lewis 55 East 86th Street New York, NY 10021	Office Supplies Disbursement for ☒ Primary ☐ General ☐ Other (specify)	4/12/84	135.00
D. Full Name, Mailing Address and ZIP Code	**Purpose of Disbursement**	**Date (month, day, year)**	**Amount of Each Disbursement This Period**
John Dorgon 819 East Capital Street Washington, DC 20003	Office Supplies Disbursement for ☒ Primary ☐ General ☐ Other (specify)	4/12/84	32.08
E. Full Name, Mailing Address and ZIP Code	**Purpose of Disbursement**	**Date (month, day, year)**	**Amount of Each Disbursement This Period**
John Sutter 5155 Morgan Ave. South Minneapolis, MN 55419	Office Supplies Disbursement for ☒ Primary ☐ General ☐ Other (specify)	4/12/84	12.15
F. Full Name, Mailing Address and ZIP Code	**Purpose of Disbursement**	**Date (month, day, year)**	**Amount of Each Disbursement This Period**
Tommy Wells 913 Forest Drive Birmingham, AL 35209	Per Diem Disbursement for ☒ Primary ☐ General ☐ Other (specify)	4/12/84	18.00
G. Full Name, Mailing Address and ZIP Code	**Purpose of Disbursement**	**Date (month, day, year)**	**Amount of Each Disbursement This Period**
John Sutter 5155 Morgan Ave. South Minneapolis, MN 55419	Travel Disbursement for ☒ Primary ☐ General ☐ Other (specify)	4/13/84	165.00
H. Full Name, Mailing Address and ZIP Code	**Purpose of Disbursement**	**Date (month, day, year)**	**Amount of Each Disbursement This Period**
Wolf, Block, Schorr and Solis-Cohen 12th Floor Packard Building Philadelphia, PA 19102	Postage Disbursement for ☒ Primary ☐ General ☐ Other (specify)	4/13/84	4.00
I. Full Name, Mailing Address and ZIP Code	**Purpose of Disbursement**	**Date (month, day, year)**	**Amount of Each Disbursement This Period**
Penny Gerber Suite 415 One Plymouth Meet. Plymouth Meeting, PA 19462	Travel Expense (Charter Bus) Disbursement for ☒ Primary ☐ General ☐ Other (specify)	4/10/84	272.00 In-Kind Contribution
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			

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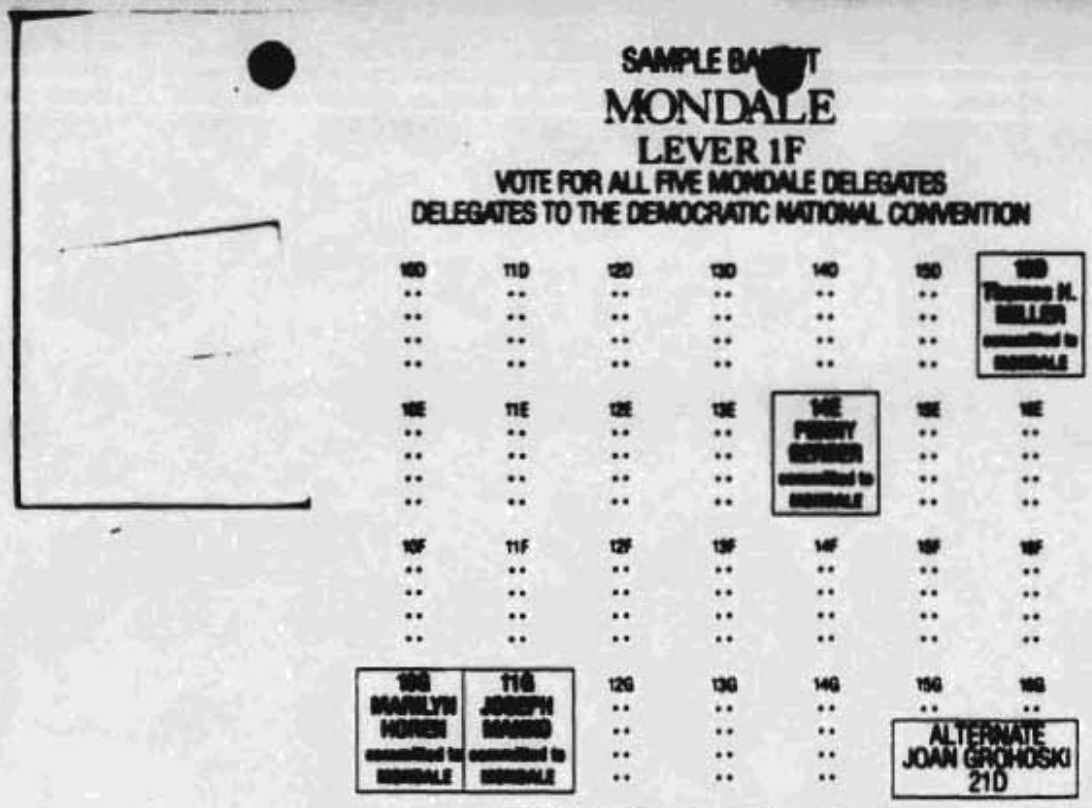
SCHEDULE B — ITEMIZED DISBURSEMENTS

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)
Mondale 13th Delegate Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Ann Lewis 55 East 86th Street New York, NY 10021	Per Diem Disbursement for ☐ Primary ☐ General ☐ Other (specify)	5/17/84	151.30
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			3,616.02

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PRESIDENT

MONDALE #105

DELEGATES

Thomas **MILLER** #142

Penny **GERBER** #147

Marilyn **HOREN** #157

Joseph **MANKO** #158

ALTERNATE

Joan **GROHOSKI** #190

Paid for by the Mondale 13th Delegate Committee

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FEC

14 P1:02

LAW OFFICES OF
F. BLOCK, SCHORR AND SOLIS-COHEN
TWELFTH FLOOR, PACKARD BUILDING
E. CORNER 15TH AND CHESTNUT STREETS
PHILADELPHIA, PA. 19102

FIRST CLASS MAIL

RTIFIED

295-813

ECEIPT REQUESTED

JMM
FROM
WOLF, BLOCK, SCHORR AND SOLIS-COHEN
Twelfth Floor - Packard Building
Philadelphia, PA 19102

Kenneth A. Gross, Esquire
Associate General Counsel
Federal Election Commission
Washington, DC 20463

CERTIFIED MAIL - R.R.R.

RECEIVED AT THE FEC
84 MAY 29 P1:07

TWELFTH FLOOR-PACKARD BUILDING
PHILADELPHIA, PA. 19102

May 25, 1984

MUR 1667

Lawrence M. Noble
Deputy General Counsel
Federal Election Commission
Washington, DC 20463

Re: MUR 1667

Dear Mr. Noble:

This will acknowledge receipt on May 16, 1984 of your letter dated May 11, 1984 notifying me that complaints had been filed by Americans with Hart, Inc. alleging possible violations by a Mondale delegate committee, of which I serve as treasurer, of the Federal Election Campaign Act of 1971 (the "Act"). By submission of this letter, which I have prepared solely on my own without any communication with the national Mondale organization or any other delegate committee, I am availing myself of the opportunity afforded to me to demonstrate that no action should be taken against the committee or me in connection with this matter.

I have read carefully the copy of the complaint and supplements which were enclosed with your May 11 letter, which charge (1) improper evasion of spending limits through the use of the delegate committees, (2) improper acceptance of PAC contributions beyond permitted limits, and (3) affiliation among Mondale delegate committees and with the national Mondale organization.

For the reasons set forth below, it is my belief that the activities of my committee, in general, and myself, as treasurer, do not fall within the ambit of such charges or violate the Act, and accordingly no action should be taken by the Committee against the committee or me.

Background

As to the origin of our committee, once I was advised in late January or early February that I had been endorsed by the Mondale organization to run as a candidate for delegate to the Democratic National Convention this July for Pennsylvania's 13th Congressional District (the "District"), I spoke with one other similarly nominated candidate, Penny Gerber, as to what efforts we should make to enhance our chances of being elected. As an elected commissioner in Lower Merion Township, I felt that I would have a good

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opportunity to gain support for all four Mondale nominees in the District, and Mrs. Gerber and the other two endorsed nominees in their areas within the District.1/ Mrs. Gerber and I agreed that we would stand a much better chance of being elected if we could get our names before the registered voters in the District, and it would be advisable to raise enough money to print "palm" cards to distribute on primary election day (April 10). We agreed to attempt to cover the expenses of printing these palm cards and get volunteers to distribute them at the polling places on election day.

Shortly thereafter, standard forms were sent out by the national Mondale organization to all endorsed delegates as to the formation of delegate committees. Since the formation of such a committee appeared to us to be a proper manner in which to proceed within the requirements of the Act, Mrs. Gerber and I decided to form our committee. As a partner at a large law firm, which had an administrative staff and was located in the same building as First Pennsylvania Bank, I agreed to be treasurer. On the other hand, Mrs. Gerber agreed that a portion of her husband's law firm in Norristown could be made available to accommodate any paid or volunteer persons since Norristown was located at or near the center of the District.

I filed the necessary papers to form the delegate committee for the District, and subsequently filed the initial and final reports in a timely fashion. Shortly before the primary, when a number of students who had worked for one or more Mondale delegate committees in states with earlier primaries came to Pennsylvania to continue to help as unpaid volunteers, Mrs. Gerber advised me that several of these young people offered to assist us, four of whom2/ devoted several weeks prior to the primary in an effort to help elect the four endorsed delegates in the District. The names of these four individuals, as well as four other young people who rendered sporadic assistance right before the election, are listed in the campaign reports, copies of which are attached hereto.

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1. I never met Marilyn Horen, one of the other endorsed delegates, and only met Thomas Miller on two subsequent occasions, on neither of which we discussed the delegate committee or its activities.

2. Ann Lewis, John Dorgon, John Sutter and Cathy Schierman were the four principal volunteers. Ms. Lewis was "in charge."

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Independence of the Delegate Committee as to its Formation, Activities, Expenses and Receipts

Having read the complaint and supplements, the charges attack the "independence" of delegate committees and their activities from the national Mondale organization. Since our delegate committee operated in a totally autonomous manner, I have devoted the remainder of this response to distinguishing us and our activities from a number of other Mondale delegate committees alleged by Americans with Hart, Inc. to have been formed and/or operated in a non-autonomous manner. These distinctions appear in no special order of priority.

1. As indicated above, the decision to form and the formation of the committee, its composition and operation, and the filing of all reports were handled strictly by Mrs. Gerber and me, with no outside assistance or direction.

2. The two printers, the auto rental company and several other merchants with whom we dealt were all local, all were selected by us with no outisde assistance or direction, and all the committee's expenses were directed solely to our own election as delegates.

3. The palm cards we printed and distributed devoted almost all the space and prominence to our four names and ballot positions, with very little space devoted to Vice President Mondale and his ballot position. I have attached a copy of the palm cards given out in Montgomery County and Philadelphia County, parts of whose areas comprise the District. Thus, the primary emphasis was on the four delegate candidates and their ballot positions, rather than Vice President Mondale. These materials stand out in stark contrast to those described in the March 28, 1984 New York Post article, a copy of which was attached as an exhibit to the complaint. Our committee purchased no other materials; in fact, we did not even send a general mailing to the electorate, use handbills or any other election materials.

4. The palm cards were handed out by unpaid volunteers at the polling places, with the exception of the eight volunteers who received per diem reimbursement and whose names and amounts of such per diem reimbursement appear on the reports. Not only did we not purchase other materials, but in fact we had a great deal of difficulty finding sufficient Mondale literature to use prior to the election or at the polling places.

5. As to contributions, as the reports indicate, all contributions were from local individuals, many of whom were lawyers in or clients of Mrs. Gerber's husband's law firm or fellow attorneys in Norristown who work with Richard Gerber, except the two contributions that were made by the Pennsylvania At-Large Delegate Committee, chaired by Edward Rendell, the District Attorney in Philadelphia. Accordingly, we accepted no money from "political action committees" or labor unions; we raised funds at a grass roots (and obviously minimal) level, barely sufficient to cover the expenditures which we made (as shown in the reports).

6. As treasurer, I received no guidance from legal counsel for the national Mondale campaign or any other official for that matter in the conduct of the affairs of the delegate committee, other than the receipt of the initial forms as to the manner in which such a committee could be created. Thus, Mrs. Gerber and I conducted all efforts on our own behalf; we did not discuss any such efforts with any other delegate committees; I was and remain unaware of the people who comprised such other committees or even which districts in Pennsylvania have such committees. Other than the request that the At-Large Delegate Committee make the two small contributions it made to our delegate committee, there was no communication with that committee either as to the conduct of our efforts to be elected or otherwise.

7. Other than the small fund raising effort, all our committee did was (a) try to get people to distribute the palm cards after we had them printed, (b) meet with ward leaders and other Democratic officials in the District, and (c) help organize three events; viz, a small gathering hosted by my parents to hear Claude Pepper speak in support of Vice President Mondale, during which speech Representative Pepper indicated that we were running for delegates; Vice President and Mrs. Mondale's appearance at Bryn Mawr College; and Mrs. Mondale's appearance at the Trevose Inn in Feasterville. Mrs. Gerber's company provided a bus for the latter two events (as indicated in the reports).

Conclusion

Accordingly, from all I can deduce from the materials sent to me and my own reading of the various statutes and regulations, although we were a "delegate committee" under 11 CFR §110.14(b)(2), our contributions

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were proper, our expenditures autonomous and the whole conduct of our effort totally geared to the election of the four endorsed delegates with little or no effort made in support of Mondale and certainly no effort made to support any other delegate committees or delegates involved in Pennsylvania or elsewhere.

I have attached hereto my affidavit confirming under oath the veracity of the statements made in this letter. In accordance with your offer, I am submitting this letter in confidentiality in accordance with 2 U.S.C. §437g(a)(4)(B) and (12)(A) and accept your willingness to maintain it in that manner.

Finally, although I see no reason why there should be any further activity with regard to this matter, I have asked one of my partners, Gerald Gornish, to serve as my counsel and enclose a completed copy of the "Statement of Designation of Counsel".

I would appreciate your confirming receipt of this submission by signing and returning the extra copy of this letter in the enclosed self-addressed envelope. I would be happy to provide any further information you may find necessary in making your recommendation to the Commission, and urge you to concur with me and advise the Commission that the general complaint does not apply to our committee, no violation of the Act exists, and the file be closed.

Very truly yours,

Joseph M. Manko

JMM:lar
Enclosures

CERTIFIED MAIL/RETURN RECEIPT REQUESTED

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VERIFICATION

COUNTY OF PHILADELPHIA :
ss
COMMONWEALTH OF PENNSYLVANIA :

Joseph M. Manko, being duly sworn, deposes and says that he was the treasurer for the Mondale 13th Delegate Committee and is authorized on its behalf to submit the accompanying letter to the Federal Election Commission, and to the best of his knowledge and belief, said contents are true and correct.

Joseph M. Manko

Sworn to and subscribed
before me this 25th day
of May, 1984.

Notary Public

ROBIN L. LUMB
Notary Public, Phila., Phila. Co.
My Commission Expires Nov. 8, 1986

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STATEMENT OF DESIGNATION OF COUNSEL

MUR 1667

NAME OF COUNSEL: Gerald Gornish, Esquire

ADDRESS: Wolf, Block, Schorr and Solis-Cohen
12th Floor Packard Building
Philadelphia, PA 19102

TELEPHONE: 215-977-2118

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.

5/25/84
Date

Signature

RESPONDENT'S NAME: Joseph M. Manko, Esquire

ADDRESS: 96 E. Levering Mill Road
Bala Cynwyd, PA 19004

HOME PHONE: 215-667-3735

BUSINESS PHONE: 215-977-2178

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STATEMENT OF ORGANIZATION

(see reverse side for instructions)

1. (a) Name of Committee (in Full) — Check if name or address is changed
Mondale 13th Delegate Committee

2. [illegible]
March 12, 1984

(b) Address (Number and Street)
12th Floor, Packard Building

3. FEC Identification Number
N/A

(c) City, State and ZIP Code
Philadelphia, PA 19102

4. Is this an amended Statement? ☐ YES ☒ NO

5. TYPE OF COMMITTEE (check one):

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

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

Name of Candidate	Candidate Party Affiliation	Office Sought	State/District

☒ (c) This committee supports/opposes only one candidate Walter Mondale (name of candidate) and is NOT an authorized committee.

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

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

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

6.

Name of Any Connected Organization or Affiliated Committee	Mailing Address and ZIP Code	Relationship
NONE		

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

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

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

Full Name	Mailing Address and ZIP Code	Title or Position
Mary McCullough	12th Floor, Packard Bldg.,Phila, PA 19102	

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

Full Name	Mailing Address and ZIP Code	Title or Position
Joseph M. Manko	12th Floor, Packard Bldg.,Phila,PA 19102	

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

Name of Bank, Depository, etc.	Mailing Address and ZIP Code
First PA Bank	15th and Chestnut Sts. Philadelphia, PA 19102

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

Joseph M. Manko — Type or Print Name of Treasurer

[signature] — SIGNATURE OF TREASURER

3/12/84 — Date

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

For further information contact: Federal Election Commission, Toll Free 800-424-9530, Local 202-523-4068

FEC FORM 1 (3/80)

85040069 3

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

(Summary Page)

ALIGN AREA | ALIGN AREA

1. Name of Committee (In Full)

Mondale 13th Delegate Committee

Address (Number and Street)

12th Floor Packard Building
15th and Chestnut Streets

City, State and ZIP Code

Philadelphia, PA 19102

☐ Check here if address is different than previously reported.

2. FEC Identification Number
C00180711

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

4. TYPE OF REPORT (Check appropriate boxes)

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

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

SUMMARY	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period 3/27/84 through 3/31/84		
6. (a) Cash on hand January 1, 1984		$ -0-
(b) Cash on Hand at Beginning of Reporting Period 3/27/84	$ -0-	
(c) Total Receipts (from Line 18)	$1,600.00	$ 1,600.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$1,600.00	$ 1,600.00
7. Total Disbursements (from Line 28)	$1,330.98	$ 1,330.98
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 269.02	$ 269.02
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)	$ -0-	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	$ -0-	

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

Joseph M. Manko
Type or Print Name of Treasurer

Joseph M. Manko
SIGNATURE OF TREASURER

4/9/84
Date

For further information contact:
Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4068

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

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

FEC FORM 3X (3/80)

RECEIVED
APR 16
FEC MAIL CENTER

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

Name of Committee (In Full): Mondale 13th Delegate Committee

Report Covering the Period: From: 3/27/84 To: 3/31/84

	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date	
I. RECEIPTS			
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees	100.00	100.00	11(a)
(Memo Entry Unitemized $)			
(b) Political Party Committees	-0-	-0-	11(b)
(c) Other Political Committees	1,500.00	1,500.00	11(c)
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c))	1,600.00	1,600.00	11(d)
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES	-0-	-0-	12
13. ALL LOANS RECEIVED	-0-	-0-	13
14. LOAN REPAYMENTS RECEIVED	-0-	-0-	14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	-0-	-0-	15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	-0-	-0-	16
17. OTHER RECEIPTS (Dividends, Interest, etc.)	-0-	-0-	17
18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)	1,600.00	1,600.00	18
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES	1,330.98	1,330.98	19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES	-0-	-0-	20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	-0-	-0-	21
22. INDEPENDENT EXPENDITURES (use Schedule E)	-0-	-0-	22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. §441 a(d)) (Use Schedule F)	-0-	-0-	23
24. LOAN REPAYMENTS MADE	-0-	-0-	24
25. LOANS MADE	-0-	-0-	25
26. REFUNDS OF CONTRIBUTIONS TO			
(a) Individuals/Persons Other Than Political Committees	-0-	-0-	26(a)
(b) Political Party Committees	-0-	-0-	26(b)
(c) Other Political Committees	-0-	-0-	26(c)
(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))	-0-	-0-	26(d)
27. OTHER DISBURSEMENTS	-0-	-0-	27
28. TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	1,330.98	1,330.98	28
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)	1,600.00	1,600.00	29
30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)	-0-	-0-	30
31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)	1,600.00	1,600.00	31
32. TOTAL OPERATING EXPENDITURES from Line 19	1,330.98	1,330.98	32
33. OFFSETS TO OPERATING EXPENDITURES from Line 15	-0-	-0-	33
34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)	1,330.98	1,330.98	34

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SCHEDULE A **ITEMIZED RECEIPTS**

Page 1 of 1 for LINE NUMBER 11A
(Use separate schedule(s) for each category of the Detailed Summary Page)

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

Name of Committee (in Full)
Mondale 13th Delegate Committee

A. Full Name, Mailing Address and ZIP Code Joseph M. Manko 96 E. Levering Mill Road Bala Cynwyd, PA 19004 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Wolf, Block, Schorr and Solis-Cohen Occupation Attorney Aggregate Year-to-Date—$ 100.00	Date (month, day, year) 3/27/84	Amount of Each Receipt this Period 100.00
B. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
C. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
D. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
E. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
F. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
G. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
SUBTOTAL of Receipts This Page (optional)			100.00
TOTAL This Period (last page this line number only)			100.00

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SCHEDULE A **ITEMIZED RECEIPTS**

Page 1 of 1 for LINE NUMBER 11c.
(Use separate schedule(s) for each category of the Detailed Summary Page)

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

Name of Committee (in Full)
Mondale 13th Delegate Committee

A. Full Name, Mailing Address and ZIP Code At-Large Delegates for Mondale 1418 Walnut Street Philadelphia, PA 19102 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$ 1,500.00	Date (month, day, year) 3/27/84 3/29/84	Amount of Each Receipt this Period 1,000.00 500.00
B. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
C. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
D. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
E. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
F. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
G. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
SUBTOTAL of Receipts This Page (optional)			1,500.00
TOTAL This Period (last page this line number only)			1,500.00

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SCHEDULE B

ITEMIZED DISBURSEMENTS

Page 1 of 1 for LINE NUMBER 19
(Use separate schedule(s) for each category of the Detailed Summary Page)

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

Name of Committee (in Full)
Mondale 13th Delegate Committee

	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Full Name, Mailing Address and ZIP Code Rent-A-Dent First & Governor Prince Blvd Lester, PA 19113	car rental Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	3/27/84	178.48
B. Full Name, Mailing Address and ZIP Code Matt Harvey 4811 Linscott Ave. Downer's Grove, IL 60515	per diem Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	3/28/84	126.00
C. Full Name, Mailing Address and ZIP Code Laura Tucker 1424 Judson Evanston, IL 60201	per diem Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	3/28/84	140.00
D. Full Name, Mailing Address and ZIP Code John Sutter 5155 Morgan Ave. S. Minneapolis, MN 55419	per diem Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	3/28/84	126.00
E. Full Name, Mailing Address and ZIP Code Janette Pittsford RR 2, Box 161 Middletown, IN 47356	per diem Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	3/28/84	126.00
F. Full Name, Mailing Address and ZIP Code Anne Lewis 55 East 86th Street New York, NY 10021	per diem Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	3/28/84	234.50
G. Full Name, Mailing Address and ZIP Code C.F.R. 1800 Hylton Street Pennsauken, NJ 08110	car rental Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	3/29/84	400.00
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			1,330.98
TOTAL This Period (last page this line number only)			1,330.98

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

(Summary Page)

ALIGN AREA

1 Name of Committee (In Full)

Mondale 13th Delegate Committee

Address (Number and Street)

12th Floor Packard Building
15th and Chestnut Streets

City, State and ZIP Code

Philadelphia, PA 19102

☐ Check here if address is different than previously reported

2 FEC Identification Number
C00180711

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

4 TYPE OF REPORT (Check appropriate boxes)

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

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

SUMMARY	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5 Covering Period 3/31/84 through 5/18/84		
6 (a) Cash on hand January 1, 1984		$ -0-
(b) Cash on Hand at Beginning of Reporting Period	$ 269.02	
(c) Total Receipts (from Line 18)	$ 3,347.00	$ 4,947.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ 3,616.02	$ 4,947.00
7 Total Disbursements (from Line 28)	$ 3,616.02	$ 4,947.00
8 Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ -0-	$ -0-
9 Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)	$ -0-	
10 Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	$ -0-	

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

Joseph M. Manko
Type or Print Name of Treasurer

Signature of Treasurer _____ Date 5/16/84

For further information contact:
Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4068

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

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

FEC FORM 3X (3/80)

8504005006922

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

Name of Committee (in Full): Mondale 13th Delegate Committee

Report Covering the Period: From 3/31/84 To 5/18/84

	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date	
I. RECEIPTS			
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees	3,347.00	3,447.00	11(a)
(Memo Entry Unitemized $)			
(b) Political Party Committees	-0-		11(b)
(c) Other Political Committees	-0-	1,500.00	11(c)
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c))	3,347.00	4,947.00	11(d)
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES	-0-	-0-	12
13. ALL LOANS RECEIVED	-0-	-0-	13
14. LOAN REPAYMENTS RECEIVED	-0-	-0-	14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	-0-	-0-	15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	-0-	-0-	16
17. OTHER RECEIPTS (Dividends, Interest, etc.)	-0-	-0-	17
18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)	3,347.00	4,947.00	18
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES	3,616.02	4,947.00	19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES	-0-	-0-	20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	-0-	-0-	21
22. INDEPENDENT EXPENDITURES (use Schedule E)	-0-	-0-	22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. §441 a(d)) (Use Schedule F)	-0-	-0-	23
24. LOAN REPAYMENTS MADE	-0-	-0-	24
25. LOANS MADE	-0-	-0-	25
26. REFUNDS OF CONTRIBUTIONS TO:			
(a) Individuals/Persons Other Than Political Committees	-0-	-0-	26(a)
(b) Political Party Committees	-0-	-0-	26(b)
(c) Other Political Committees	-0-	-0-	26(c)
(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))	-0-	-0-	26(d)
27. OTHER DISBURSEMENTS	-0-	-0-	27
28. TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	3,616.02	4,947.00	28
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)	3,347.00	4,947.00	29
30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)	-0-	-0-	30
31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)	3,347.00	4,947.00	31
32. TOTAL OPERATING EXPENDITURES from Line 19	3,616.02	4,947.00	32
33. OFFSETS TO OPERATING EXPENDITURES from Line 15	-0-	-0-	33
34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)	3,616.02	4,947.00	34

8 0 4 0 5 0 0 7 0 0

SCHEDULE A ● **ITEMIZED RECEIPTS** ●

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

Name of Committee (in Full)
Mondale 13th Delegate Committee

	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
A. Full Name, Mailing Address and ZIP Code Lawrence T. Tornetta 833 East Germantown Pike Norristown, PA 19401	Tornetta Realty	4/4/84	200.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify)	Occupation: Realtor		
	Aggregate Year-to-Date-$200.00		
B. Full Name, Mailing Address and ZIP Code Mitchell W. Miller 1901 DeKalb Street Norristown, PA 19401	Miller & Turatsky	4/4/84	200.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify)	Occupation: Attorney		
	Aggregate Year-to-Date-$ 200.00		
C. Full Name, Mailing Address and ZIP Code Leonard A. Talone 825 Fayette Street Conshohocken, PA 19428	Wisler, Perlstein, Talone, Craig & Garrity	4/4/84	100.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify)	Occupation: Attorney		
	Aggregate Year-to-Date-$ 100.00		
D. Full Name, Mailing Address and ZIP Code S. Harrison Dogole 2503 Lombard Street Philadelphia, PA 19146	Globe Security Systems	4/6/84	500.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify)	Occupation: Businessman		
	Aggregate Year-to-Date-$ 500.00		
E. Full Name, Mailing Address and ZIP Code Gary Kleitman Suite 704, One Montgomery Plaza Norristown, PA 19401	Kleitman, Pincus, Haskins	4/9/84	50.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify)	Occupation: Attorney		
	Aggregate Year-to-Date-$ 50.00		
F. Full Name, Mailing Address and ZIP Code Andrew B. Cantor 515 Swede Street Norristown, PA 19401	Wisler, Perlstein, Talone, Craig & Garrity	4/9/84	100.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify)	Occupation: Attorney		
	Aggregate Year-to-Date-$ 100.00		
G. Full Name, Mailing Address and ZIP Code Arthur Poley 325 Sawmill Lane Horsham, PA	Arthur Poley Landscaping	4/9/84	1,000.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify)	Occupation: Landscaper		
	Aggregate Year-to-Date-$ 1,000.00		
SUBTOTAL of Receipts This Page (optional)			
TOTAL This Period (last page this line number only)			

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SCHEDULE A **ITEMIZED RECEIPTS**

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

Name of Committee (in Full)
Mondale 13th Delegate Committee

	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
A. Full Name, Mailing Address and ZIP Code Elliot Weinberg		4/12/84	25.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify)	Occupation		
	Aggregate Year-to-Date – $25.00		
B. Full Name, Mailing Address and ZIP Code Leon H. Fox, Jr. 6 Firethorne Circle Lafayette Hill, PA 19444	Name of Employer	4/12/84	200.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify)	Occupation		
	Aggregate Year-to-Date – $200.00		
C. Full Name, Mailing Address and ZIP Code William H. Pugh 510 Swede Street Norristown, PA 19401	Name of Employer Kane, Pugh, Bonner, & Knoell	4/12/84	200.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify)	Occupation Attorney		
	Aggregate Year-to-Date – $200.00		
D. Full Name, Mailing Address and ZIP Code Joseph M. Manko 96 E. Levering Mill Road Bala Cynwyd, PA 19004	Name of Employer Wolf, Block, Schorr & Solis-Cohen	4/12/84	400.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify)	Occupation Attorney		
	Aggregate Year-to-Date – $500.00		
E. Full Name, Mailing Address and ZIP Code Frank Murphy	Name of Employer	4/12/84	100.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify)	Occupation		
	Aggregate Year-to-Date – $100.00		
F. Full Name, Mailing Address and ZIP Code Penny Gerber Suite 415, One Plymouth Meeting Plymouth Meeting, PA 19462	Name of Employer PenDel Coach Lines, Inc.	4/10/84	272.00 In-Kind Contribution
Receipt For: ☒ Primary ☐ General ☐ Other (specify)	Occupation Businesswoman		
	Aggregate Year-to-Date – $ 272.00		
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Occupation		
	Aggregate Year-to-Date – $		
SUBTOTAL of Receipts This Page (optional)			
TOTAL This Period (last page this line number only)			3,347.00

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SCHEDULE B **ITEMIZED DISBURSEMENTS**

Page 1 of 4
LINE NUMBER 18
(Use separate schedule(s) for each category of the Detailed Summary Page)

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Name of Committee (in Full)
Mondale 13th Delegate Committee

	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Full Name, Mailing Address and ZIP Code Swift Print, Inc. 461 Bethlehem Pike Fort Washington, PA 19034	Printing Disbursement for ☒ Primary ☐ General ☐ Other (specify)	4/4/84	45.58
B. Full Name, Mailing Address and ZIP Code John Bergandino 801 Buttonwood Street Norristown, PA 19401	Signs Disbursement for ☒ Primary ☐ General ☐ Other (specify)	4/4/84	100.00
C. Full Name, Mailing Address and ZIP Code Kennedy Printing Co. 5534 Baltimore Ave. Philadelphia, PA 19143	Printing Disbursement for ☒ Primary ☐ General ☐ Other (specify)	4/4/84 4/6/84 4/19/84	300.00 281.94 262.88
D. Full Name, Mailing Address and ZIP Code John C. Dorgon 819 East Capital Street Washington, DC 20003	Per Diem Disbursement for ☒ Primary ☐ General ☐ Other (specify)	4/6/84	54.00
E. Full Name, Mailing Address and ZIP Code David Levine 297 LaMark Drive Amherst, NY 14226	Per Diem Disbursement for ☒ Primary ☐ General ☐ Other (specify)	4/6/84	54.00
F. Full Name, Mailing Address and ZIP Code Catherine Scheirman 1312 Connecticut Lawrence, KS 66044	Per Diem Disbursement for ☒ Primary ☐ General ☐ Other (specify)	4/6/84	54.00
G. Full Name, Mailing Address and ZIP Code Tommy Wells 913 Forest Drive Birmingham, AL 35209	Per Diem Disbursement for ☒ Primary ☐ General ☐ Other (specify)	4/6/84	54.00
H. Full Name, Mailing Address and ZIP Code Laura Tucker 1424 Judson Evanston, IL 60201	Travel Disbursement for ☒ Primary ☐ General ☐ Other (specify)	4/10/84	140.00
I. Full Name, Mailing Address and ZIP Code Ann Lewis 55 East 86th Street New York, NY 10021	Travel Disbursement for ☒ Primary ☐ General ☐ Other (specify)	4/10/84	145.00
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			

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SCHEDULE B ● **ITEMIZED DISBURSEMENTS** ●

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Name of Committee (in Full)
Mondale 13th Delegate Committee

	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Full Name, Mailing Address and ZIP Code Tommy Wells 913 Forest Drive Birmingham, AL 35209	Travel Disbursement for ☒ Primary ☐ General ☐ Other (specify)	4/10/84	26.50
B. Full Name, Mailing Address and ZIP Code John Sutter 5155 Morgan Ave. South Minneapolis, MN 55419	Travel Disbursement for ☒ Primary ☐ General ☐ Other (specify)	4/10/84	165.00
C. Full Name, Mailing Address and ZIP Code Matt Harvey 4811 Linscott Ave. Downer's Grove, IL 60515	Travel Disbursement for ☒ Primary ☐ General ☐ Other (specify)	4/10/84	40.00
D. Full Name, Mailing Address and ZIP Code David Levine 297 LaMark Drive Amherst, NY 14226	Travel Disbursement for ☒ Primary ☐ General ☐ Other (specify)	4/10/84	65.00
E. Full Name, Mailing Address and ZIP Code Catherine Scheirman 1312 Connecticut Lawrence, KS 66044	Travel Disbursement for ☒ Primary ☐ General ☐ Other (specify)	4/10/84	163.00
F. Full Name, Mailing Address and ZIP Code John C. Dorgon 819 East Capital Street Washington, DC 20003	Travel Disbursement for ☒ Primary ☐ General ☐ Other (specify)	4/10/84	26.50
G. Full Name, Mailing Address and ZIP Code Rent-A-Dent 1st and Governor Prince Blvd. Lester, PA 19113	Car Rental Disbursement for ☒ Primary ☐ General ☐ Other (specify)	4/11/84	130.60
H. Full Name, Mailing Address and ZIP Code Budget Rent-A-Car Swede & Georgetown Pike Norristown, PA 19401	Car Rental Disbursement for ☒ Primary ☐ General ☐ Other (specify)	4/11/84	370.00
I. Full Name, Mailing Address and ZIP Code Lane 1813 Ranstead Street Philadelphia, PA 19103	Printing Disbursement for ☒ Primary ☐ General ☐ Other (specify)	4/11/84	200.00
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			

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SCHEDULE B

ITEMIZED DISBURSEMENTS

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Name of Committee (in Full)

Mondale 13th Delegate Committee

	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Full Name, Mailing Address and ZIP Code Coach Inn Motor Hotel 285 Commerce Drive Fort Washington, PA 19034	Catering Costs Disbursement for ☒ Primary ☐ General ☐ Other (specify)	4/12/84	124.47
B. Full Name, Mailing Address and ZIP Code Cathy Schierman 1312 Connecticut Lawrence, KS 66044	Office Supplies Disbursement for ☒ Primary ☐ General ☐ Other (specify)	4/12/84	24.02
C. Full Name, Mailing Address and ZIP Code Ann Lewis 55 East 86th Street New York, NY 10021	Office Supplies Disbursement for ☒ Primary ☐ General ☐ Other (specify)	4/12/84	135.00
D. Full Name, Mailing Address and ZIP Code John Dorgon 819 East Capital Street Washington, DC 20003	Office Supplies Disbursement for ☒ Primary ☐ General ☐ Other (specify)	4/12/84	32.08
E. Full Name, Mailing Address and ZIP Code John Sutter 5155 Morgan Ave. South Minneapolis, MN 55419	Office Supplies Disbursement for ☒ Primary ☐ General ☐ Other (specify)	4/12/84	12.15
F. Full Name, Mailing Address and ZIP Code Tommy Wells 913 Forest Drive Birmingham, AL 35209	Per Diem Disbursement for ☒ Primary ☐ General ☐ Other (specify)	4/12/84	18.00
G. Full Name, Mailing Address and ZIP Code John Sutter 5155 Morgan Ave. South Minneapolis, MN 55419	Travel Disbursement for ☒ Primary ☐ General ☐ Other (specify)	4/13/84	165.00
H. Full Name, Mailing Address and ZIP Code Wolf, Block, Schorr and Solis-Cohen 12th Floor Packard Building Philadelphia, PA 19102	Postage Disbursement for ☒ Primary ☐ General ☐ Other (specify)	4/13/84	4.00
I. Full Name, Mailing Address and ZIP Code Penny Gerber Suite 415 One Plymouth Meet. Plymouth Meeting, PA 19462	Travel Expense (Charter Bus) Disbursement for ☒ Primary ☐ General ☐ Other (specify)	4/10/84	272.00 In-Kind Contribution
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			

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SCHEDULE B **ITEMIZED DISBURSEMENTS**

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Name of Committee (in Full)
Mondale 13th Delegate Committee

	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Full Name, Mailing Address and ZIP Code Ann Lewis 55 East 86th Street New York, NY 10021	Per Diem Disbursement for ☒ Primary ☐ General ☐ Other (specify)	5/17/84	151.30
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)		
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)		
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)		
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)		
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)		
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)		
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)		
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)		
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			3,616.02

8504050705

PRESIDENT

MONDALE #105

DELEGATES

Thomas **MILLER** #142

Penny **GERBER** #147

Marilyn **HOREN** #157

Joseph **MANKO** #158

ALTERNATE

Joan **GROHOSKI** #190

Paid for by the Mondale 13th Delegate Committee

P3

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SAMPLE BALLOT

MONDALE

LEVER 1F

VOTE FOR ALL FIVE MONDALE DELEGATES

DELEGATES TO THE DEMOCRATIC NATIONAL CONVENTION

10D	11D	12D	13D	14D	15D	16D
••	••	••	••	••	••	Thomas H. MILLER committed to MONDALE
••	••	••	••	••	••	
••	••	••	••	••	••	
••	••	••	••	••	••	
10E	11E	12E	13E	14E	15E	16E
••	••	••	••	PENNY GERBER committed to MONDALE	••	••
••	••	••	••		••	••
••	••	••	••		••	••
••	••	••	••		••	••
10F	11F	12F	13F	14F	15F	16F
••	••	••	••	••	••	••
••	••	••	••	••	••	••
••	••	••	••	••	••	••
••	••	••	••	••	••	••
10G	11G	12G	13G	14G	15G	16G
MARILYN HOREN committed to MONDALE	JOSEPH MANKO committed to MONDALE	••	••	••	••	••
		••	••	••	ALTERNATE JOAN GROHOSKI 21D	
		••	••	••		

PAID FOR BY THE MONDALE 13th DELEGATE COMMITTEE

P3

TWELFTH FLOOR-PACKARD BUILDING
PHILADELPHIA, PA. 19102

May 25, 1984

Lawrence M. Noble
Deputy General Counsel
Federal Election Commission
Washington, DC 20463

Re: MUR 1667

Dear Mr. Noble:

This will acknowledge receipt on May 16, 1984 of your letter dated May 11, 1984 notifying me that complaints had been filed by Americans with Hart, Inc. alleging possible violations by a Mondale delegate committee, of which I serve as treasurer, of the Federal Election Campaign Act of 1971 (the "Act"). By submission of this letter, which I have prepared solely on my own without any communication with the national Mondale organization or any other delegate committee, I am availing myself of the opportunity afforded to me to demonstrate that no action should be taken against the committee or me in connection with this matter.

I have read carefully the copy of the complaint and supplements which were enclosed with your May 11 letter, which charge (1) improper evasion of spending limits through the use of the delegate committees, (2) improper acceptance of PAC contributions beyond permitted limits, and (3) affiliation among Mondale delegate committees and with the national Mondale organization.

For the reasons set forth below, it is my belief that the activities of my committee, in general, and myself, as treasurer, do not fall within the ambit of such charges or violate the Act, and accordingly no action should be taken by the Commission against the committee or me.

Background

As to the origin of our committee, once I was advised in late January or early February that I had been endorsed by the Mondale organization to run as a candidate for delegate to the Democratic National Convention this July for Pennsylvania's 13th Congressional District (the "District"), I spoke with one other similarly nominated candidate, Penny Gerber, as to what efforts we should make to enhance our chances of being elected. As an elected commissioner in Lower Merion Township, I felt that I would have a good

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opportunity to gain support for all four Mondale nominees in the District, and Mrs. Gerber and the other two endorsed nominees in their areas within the District.1/ Mrs. Gerber and I agreed that we would stand a much better chance of being elected if we could get our names before the registered voters in the District, and it would be advisable to raise enough money to print "palm" cards to distribute on primary election day (April 10). We agreed to attempt to cover the expenses of printing these palm cards and get volunteers to distribute them at the polling places on election day.

Shortly thereafter, standard forms were sent out by the national Mondale organization to all endorsed delegates as to the formation of delegate committees. Since the formation of such a committee appeared to us to be a proper manner in which to proceed within the requirements of the Act, Mrs. Gerber and I decided to form our committee. As a partner at a large law firm, which had an administrative staff and was located in the same building as First Pennsylvania Bank, I agreed to be treasurer. On the other hand, Mrs. Gerber agreed that a portion of her husband's law firm in Norristown could be made available to accommodate any paid or volunteer persons since Norristown was located at or near the center of the District.

I filed the necessary papers to form the delegate committee for the District, and subsequently filed the initial and final reports in a timely fashion. Shortly before the primary, when a number of students who had worked for one or more Mondale delegate committees in states with earlier primaries came to Pennsylvania to continue to help as unpaid volunteers, Mrs. Gerber advised me that several of these young people offered to assist us, four of whom2/ devoted several weeks prior to the primary in an effort to help elect the four endorsed delegates in the District. The names of these four individuals, as well as four other young people who rendered sporadic assistance right before the election, are listed in the campaign reports, copies of which are attached hereto.

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1. I never met Marilyn Horen, one of the other endorsed delegates, and only met Thomas Miller on two subsequent occasions, on neither of which we discussed the delegate committee or its activities.

2. Ann Lewis, John Dorgon, John Sutter and Cathy Schierman were the four principal volunteers. Ms. Lewis was "in charge."

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Independence of the Delegate Committee as to its Formation, Activities, Expenses and Receipts

Having read the complaint and supplements, the charges attack the "independence" of delegate committees and their activities from the national Mondale organization. Since our delegate committee operated in a totally autonomous manner, I have devoted the remainder of this response to distinguishing us and our activities from a number of other Mondale delegate committees alleged by Americans with Hart, Inc. to have been formed and/or operated in a non-autonomous manner. These distinctions appear in no special order of priority.

1. As indicated above, the decision to form and the formation of the committee, its composition and operation, and the filing of all reports were handled strictly by Mrs. Gerber and me, with no outside assistance or direction.

2. The two printers, the auto rental company and several other merchants with whom we dealt were all local, all were selected by us with no outisde assistance or direction, and all the committee's expenses were directed solely to our own election as delegates.

3. The palm cards we printed and distributed devoted almost all the space and prominence to our four names and ballot positions, with very little space devoted to Vice President Mondale and his ballot position. I have attached a copy of the palm cards given out in Montgomery County and Philadelphia County, parts of whose areas comprise the District. Thus, the primary emphasis was on the four delegate candidates and their ballot positions, rather than Vice President Mondale. These materials stand out in stark contrast to those described in the March 28, 1984 New York Post article, a copy of which was attached as an exhibit to the complaint. Our committee purchased no other materials; in fact, we did not even send a general mailing to the electorate, use handbills or any other election materials.

4. The palm cards were handed out by unpaid volunteers at the polling places, with the exception of the eight volunteers who received per diem reimbursement and whose names and amounts of such per diem reimbursement appear on the reports. Not only did we not purchase other materials, but in fact we had a great deal of difficulty finding sufficient Mondale literature to use prior to the election or at the polling places.

5. As to contributions, as the reports indicate, all contributions were from local individuals, many of whom were lawyers in or clients of Mrs. Gerber's husband's law firm or fellow attorneys in Norristown who work with Richard Gerber, except the two contributions that were made by the Pennsylvania At-Large Delegate Committee, chaired by Edward Rendell, the District Attorney in Philadelphia. Accordingly, we accepted no money from "political action committees" or labor unions; we raised funds at a grass roots (and obviously minimal) level, barely sufficient to cover the expenditures which we made (as shown in the reports).

6. As treasurer, I received no guidance from legal counsel for the national Mondale campaign or any other official for that matter in the conduct of the affairs of the delegate committee, other than the receipt of the initial forms as to the manner in which such a committee could be created. Thus, Mrs. Gerber and I conducted all efforts on our own behalf; we did not discuss any such efforts with any other delegate committees; I was and remain unaware of the people who comprised such other committees or even which districts in Pennsylvania have such committees. Other than the request that the At-Large Delegate Committee make the two small contributions it made to our delegate committee, there was no communication with that committee either as to the conduct of our efforts to be elected or otherwise.

7. Other than the small fund raising effort, all our committee did was (a) try to get people to distribute the palm cards after we had them printed, (b) meet with ward leaders and other Democratic officials in the District, and (c) help organize three events; viz, a small gathering hosted by my parents to hear Claude Pepper speak in support of Vice President Mondale, during which speech Representative Pepper indicated that we were running for delegates; Vice President and Mrs. Mondale's appearance at Bryn Mawr College; and Mrs. Mondale's appearance at the Trevose Inn in Feasterville. Mrs. Gerber's company provided a bus for the latter two events (as indicated in the reports).

Conclusion

Accordingly, from all I can deduce from the materials sent to me and my own reading of the various statutes and regulations, although we were a "delegate committee" under 11 CFR §110.14(b)(2), our contributions

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were proper, our expenditures autonomous and the whole conduct of our effort totally geared to the election of the four endorsed delegates with little or no effort made in support of Mondale and certainly no effort made to support any other delegate committees or delegates involved in Pennsylvania or elsewhere.

I have attached hereto my affidavit confirming under oath the veracity of the statements made in this letter. In accordance with your offer, I am submitting this letter in confidentiality in accordance with 2 U.S.C. §437g(a)(4)(B) and (12)(A) and accept your willingness to maintain it in that manner.

Finally, although I see no reason why there should be any further activity with regard to this matter, I have asked one of my partners, Gerald Gornish, to serve as my counsel and enclose a completed copy of the "Statement of Designation of Counsel".

I would appreciate your confirming receipt of this submission by signing and returning the extra copy of this letter in the enclosed self-addressed envelope. I would be happy to provide any further information you may find necessary in making your recommendation to the Commission, and urge you to concur with me and advise the Commission that the general complaint does not apply to our committee, no violation of the Act exists, and the file be closed.

Very truly yours,

Joseph M. Manko

JMM:lar
Enclosures

CERTIFIED MAIL/RETURN RECEIPT REQUESTED

RECEIPT ACKNOWLEDGED:

_____

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Very truly yours,

Joseph M. Manko

JMM:lar
Enclosures

CERTIFIED MAIL/RETURN RECEIPT REQUESTED

RECEIPT ACKNOWLEDGED:

_____

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LAW OFFICES OF
. BLOCK, SCHORR AND SOLIS-COHEN
TWELFTH FLOOR, PACKARD BUILDING
. CORNER 15TH AND CHESTNUT STREETS
PHILADELPHIA, PA. 19102

FIRST CLASS MAIL

CERTIFIED
No. 896-885

JIM
FROM
WOLF, BLOCK, SCHORR AND SOLIS-COHEN
Twelfth Floor - Packard Building
Philadelphia, PA 19102

Lawrence M. Noble
Deputy General Counsel
Federal Election Commission
Washington, DC 20463

CERTIFIED MAIL - R.R.R.

RETURN RECEIPT REQUESTED

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Joseph P. Manko, Treasurer
Mondale 13th Delegate Committee
12th Floor Packard Building
Philadelphia, PA 19102

Re: MUR 1667

Dear Mr. Manko:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

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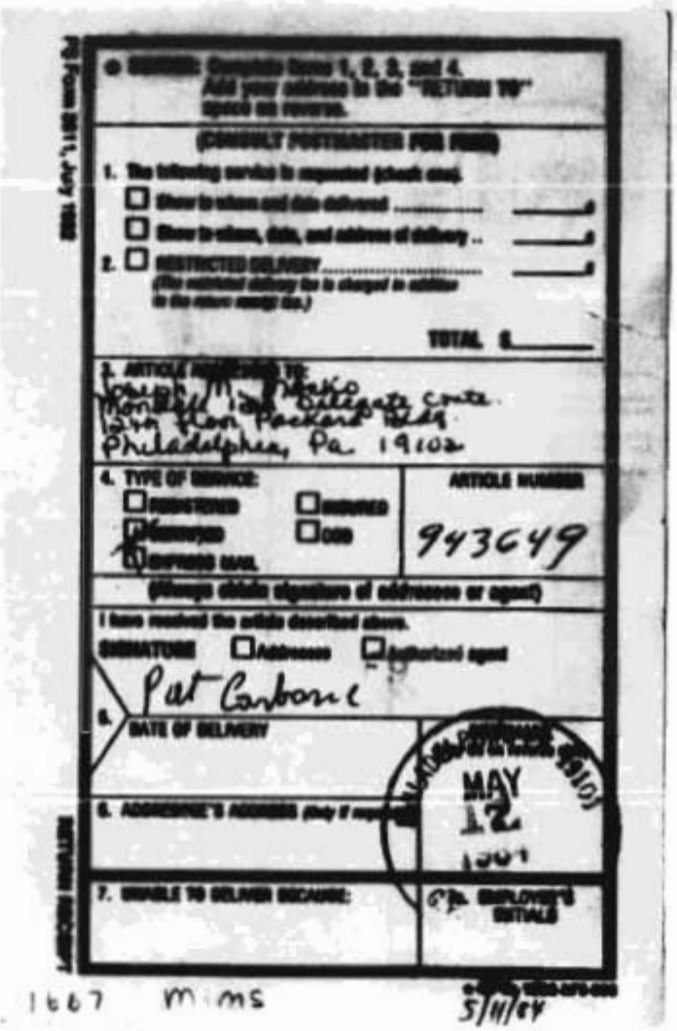
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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



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RECEIVED AT THE FEC
GCC#3411
84 MAY 31 AM 8:54

PEPPER, HAMILTON & SCHEETZ

ATTORNEYS AT LAW

1777 F STREET, N.W.
WASHINGTON, D.C. 20006
202-842-8100

10 SOUTH MARKET SQUARE
HARRISBURG, PA 17108
717-255-1155

100 RENAISSANCE CENTER
DETROIT, MI 48243
313-259-7110

20TH FLOOR
THE FIDELITY BUILDING
123 SOUTH BROAD STREET
PHILADELPHIA, PENNSYLVANIA 19109
215-563-2000

CABLE ADDRESS "PEPTIL PHILADELPHIA"
TELECOPIER (G-488) 215-735-9888 · (G-200) 215-568-8864
DEX (G-2100) 215-848-3827 · TWX 710-670-0777

606 SOUTH OLIVE STREET
LOS ANGELES, CA 90014
213-617-0181

518 HAMILTON STREET
ALLENTOWN, PA 18101
215-434-0104

SIX CORPORATE PARK DRIVE
WHITE PLAINS, NY 10604
914-694-4800

May 29, 1984

Stephen Mims
General Counsel's Office
Federal Election Commission
1325 K Street, N.W.
Washington, DC. 20463

Re: Americans with Hart, Inc. v. Mondale
for President Committee, Inc., MUR 1667

Dear Mr. Mims:

This letter and supporting exhibits constitute the response of the Mondale Delegate Committee - 12th Congressional District ("12th District Committee" or "Committee") to allegations made in an amended complaint filed with the Federal Election Commission ("FEC") by Americans with Hart, Inc. ("Hart") against Mondale for President Committee ("MPC"). Because the Hart Complaint contains no specific charges against the 12th District Committee and because the 12th District Committee is not knowledgeable about the activities of other delegate committees or of MPC, this submission will only briefly outline and explain those 12th District Committee activities which would appear to be pertinent to Hart's vague charges.

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I. Organization

The Committee was organized on March 9, 1984. See Exhibit "A", "Statement of Organization." William H. Kerr, a local school teacher and candidate for alternate delegate, served as Treasurer. The Committee was formed to finance and conduct the campaigns of seven individuals from the Twelfth District for election to five delegate and two alternate positions at the Democratic National Convention.

Although the delegate candidates had received some literature from MPC explaining federal election law requirements regarding delegate committees, the impetus for establishing the Committee was actually Pennsylvania's new dual primary system itself. Contrary to Hart's allegations that the Mondale delegate committees were established by MPC "for the very purpose of circumventing the contribution expenditure limitations," (See Hart April 6 Complaint at p.7), the 12th District Committee was founded upon the exigencies arising from the state's primary system. Because delegates were directly elected, independent of the percentage of votes captured by the candidates to whom they were pledged, the district's delegate candidates had to conduct their own campaigns in order to assure their election.

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II. Contributions and Disbursements

Attached is Exhibit "B" which constitutes the Committee's quarterly "Report of Receipts and Disbursements" filed with the FEC. To update that report, the "Guaranteed Outstanding Contributions" listed in Schedule C have all been received. Only a few of the debts and obligations listed in Schedule D remain outstanding. Until such debts are paid, the Committee will continue to file all necessary reports with the FEC.

Contributions made to the 12th District Committee included donations from each of the 7 candidates who formed the Committee. Additionally, three unions, associated with certain of the delegate candidates, donated money through their Political Action Committees (PAC's). Each of these PAC contributions was well under the legal limit of $5,000. Thus, Hart's repeated reference to use of PAC money appears to be less a legal issue than political posturing. Receipt of PAC money carries no implication of affiliation with either MPC or with other delegate committees, the gravamen of Hart's charges. To the contrary, MPC expressed its opposition to acceptance of PAC funds by local delegate committees, and yet the 12th District Committee nevertheless accepted these contributions.

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In a similar vein, the Committee received no transfers of funds from other delegate committees, either in-state or out-of-state.

The Committee did make two loans to other delegate committees. See Schedule B of Exhibit B. The Committee is still trying to have these loans repaid. The sums involved were relatively small and do not satisfy the affiliation criteria of 11 C.F.R. §100.5(g)(2)(ii). The only criterion even remotely applicable would be that of §100.5(g)(2)(ii)(E). Under that test, committees may be deemed affiliated where a transfer of funds between committees represents "a substantial portion of the funds of either the transferor or transferee committee." Id. Here, the combined sum amounts to well under a third of the Committee's funds. The transfers did not create an affiliation among the committees.

III. Staffing

Most of the Committee's local campaign activities were performed by resident volunteers. In addition, the Committee had five workers from out of the state who were obtained with the help of PALC. They performed certain organizational and administrative chores in support of the Committee's activities, and were reimbursed on a per diem basis for food, lodging and travel expenses. See Schedule B of Exhibit "B". Insofar as the

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Committee is aware, these five received no other remuneration, either from PALC or MPC.

Many local volunteers actively participated in the campaign, distributing fliers, organizing and attending rallies, and making telephone calls to prospective voters. The campaign was a grass roots, independent venture directed solely at the election of delegates for the 12th district. There was no affiliation or coordination with MPC at any stage of the campaign, contrary to Hart's charges.

IV. Conclusion

Based on the foregoing information, the Commission should find that the 12th District Committee did not violate the Federal Election Campaign Act.

Respectfully submitted,

PETER HEARN
JAMES M. BECK
Pepper, Hamilton and Scheetz
2001 The Fidelity Building
123 South Broad Street
Philadelphia, PA 19109
(215) 893-3000

Attorneys for WILLIAM H. KERR, TREASURER, MONDALE DELEGATE COMMITTEE - 12th CONGRESSIONAL DISTRICT

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STATEMENT OF ORGANIZATION

(see reverse side for instructions)

1. (a) Name of Committee (in Full) — Check if name or address is changed.
Mondale Delegate Committee-12th Congressional District

2. [illegible] March 9,1984

(b) Address (Number and Street)
303 South Warren Avenue,

3. FEC Identification Number

(c) City, State and ZIP Code
Apollo, Pennsylvania 15613

4. Is this an amended Statement? ☐ YES ☒ NO

5. TYPE OF COMMITTEE (check one):

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

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

Name of Candidate	Candidate Party Affiliation	Office Sought	State/District

☒ (c) This committee supports/opposes only one candidate [illegible] and is NOT an authorized committee.
(name of candidate)

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

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

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

6. Name of Any Connected Organization or Affiliated Committee	Mailing Address and ZIP Code	Relationship
NONE		

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

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

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

Full Name	Mailing Address and ZIP Code	Title or Position
Treasurer		

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

Full Name	Mailing Address and ZIP Code	Title or Position
William H. Kerr	303 [illegible], Apollo, PA 15613	Treasurer
Harvey W. Bruner, Jr.	105 [illegible], Apollo, PA 15613	Ass't Treas.

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

Name of Bank, Depository, etc.	Mailing Address and ZIP Code
Apollo Trust Company	[illegible] Warren Avenue, Apollo, PA 15

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

William H. Kerr — Type or Print Name of Treasurer

William H. Kerr — SIGNATURE OF TREASURER

March 9,1984 — Date

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

For further information contact: Federal Election Commission, Toll Free 800-424-9530, Local 202-523-4068

FEC FORM 1 (3/80)

EXHIBIT "A"

RECEIVED MAY 21 1984

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

ACKNOWLEDGEMENT OF RECEIPT OF STATEMENT OF ORGANIZATION

Filed pursuant to the Federal Election Campaign Act of 1971, as amended

WILLIAM H. KERR, TREAS.
MONDALE DELEGATE COMMITTEE-12TH CONGRESSIONAL DISTRICT
303 SOUTH WARREN AVENUE
APOLLO, PENNSYLVANIA 15613

DATE: 03/12/84

NOTICE REGARDING FILINGS UNDER THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED

Your assigned FEC IDENTIFICATION NUMBER is C00178954

In the future this number should be entered on all subsequent reports filed under the Act, as well as on all communications concerning such reports and statements. This acknowledgement will be the only receipt provided directly by the Commission, for documents filed. The Commission recommends that all future filings be mailed Certified or Registered, Return Receipt Requested, in order to insure timeliness of your filings and to provide additional receipts for your records.

FEDERAL ELECTION COMMISSION

FEC FORM 20 (10/12/76)
(Supersedes FEC Forms 13, 14, and 15)

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RECEIVED

REPORT OF RECEIPTS AND DISBURSEMENTS
For [illegible] Committee Other Than an Authorized Committee

(Summary Page)

ALIGN AREA [ ] [ ] ALIGN AREA

1. Name of Committee (In Full)
Mondale Delegate Committee
12th Congressional District

Address (Number and Street)
303 South Warren Avenue

City, State and ZIP Code
Apollo, PA 15613

[ ] Check here if address is different than previously reported.

2. FEC Identification Number
C00178954

3. [X] This committee qualified as a multicandidate committee during this Reporting Period on March 12, 1984 (Date)

4. TYPE OF REPORT (Check appropriate boxes)

(a) [X] April 15 Quarterly Report [ ] October 15 Quarterly Report
[ ] July 15 Quarterly Report [ ] January 31 Year End Report
[ ] July 31 Mid Year Report (Non Election Year Only)
[ ] Monthly Report for _____
[ ] Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____
[ ] Thirtieth day report following the General Election on _____ in the State of _____
[ ] Termination Report

(b) Is this Report an Amendment?
[ ] YES [X] NO

SUMMARY

5. Covering Period January 1 through March 31, 1984

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. (a) Cash on hand January 1, 19 84		$ -0-
(b) Cash on Hand at Beginning of Reporting Period	$ -0-	
(c) Total Receipts (from Line 18)	$ 6,750.00	$ 6,750.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ 6,750.00	$ 6,750.00
7. Total Disbursements (from Line 28)	$ 5,089.46	$ 5,089.46
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 1,660.54	$ 1,660.54
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)	$ 4,874.75	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	$ 8,801.23	

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

William H. Kerr
Type or Print Name of Treasurer

William H. Kerr
SIGNATURE OF TREASURER

April 11, 1984
Date

For further information contact:
Federal Election Commission
Toll Free 800 424 9530
Local 202 523 4068

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

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

[ ] [ ] [ ] [ ] [ ] [ ] [ ] [ ] [ ]

FEC FORM 3X (3/80)

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EXHIBIT "B"

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

Name of Committee (in Full): Mondale Delegate Committee-12th Congressional District

Report Covering the Period: From January 1 To March 31, 1984

	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date	
I. RECEIPTS			
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees	750.00	750.00	11(a)
(Memo Entry Unitemized $ 750.00)			
(b) Political Party Committees	-0-	-0-	11(b)
(c) Other Political Committees	6,000.00	6,000.00	11(c)
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c))	6,750.00	6,750.00	11(d)
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES	-0-	-0-	12
13. ALL LOANS RECEIVED	-0-	-0-	13
14. LOAN REPAYMENTS RECEIVED	-0-	-0-	14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	-0-	-0-	15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	-0-	-0-	16
17. OTHER RECEIPTS (Dividends, Interest, etc.)	-0-	-0-	17
18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)	6,750.00	6,750.00	18
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES	3,880.46	3,880.46	19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES	1,709.00	1,709.00	20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	-0-	-0-	21
22. INDEPENDENT EXPENDITURES (use Schedule E)	-0-	-0-	22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. § 441 a(d)) (Use Schedule F)	-0-	-0-	23
24. LOAN REPAYMENTS MADE	-0-	-0-	24
25. LOANS MADE	-0-	-0-	25
26. REFUNDS OF CONTRIBUTIONS TO			
(a) Individuals/Persons Other Than Political Committees	-0-	-0-	26(a)
(b) Political Party Committees	-0-	-0-	26(b)
(c) Other Political Committees	-0-	-0-	26(c)
(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))	-0-	-0-	26(d)
27. OTHER DISBURSEMENTS	-0-	-0-	27
28. TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	5,089.46	5,089.46	28
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)	6,750.00	6,750.00	29
30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)	-0-	-0-	30
31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)	6,750.00	6,750.00	31
32. TOTAL OPERATING EXPENDITURES from Line 19	3,880.46	3,880.46	32
33. OFFSETS TO OPERATING EXPENDITURES from Line 15	-0-	-0-	33
34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)	3,880.46	3,880.46	34

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Page 1 of 4 for LINE NUMBER ____
(Use separate schedule(s) for each category of the Detailed Summary Page)

SCHEDULE A — ITEMIZED RECEIPTS

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

Name of Committee (in Full)
Mondale Delegate Committee--12th Congressional District

	Name of Employer / Occupation / Aggregate Year-to-Date	Date (month, day, year)	Amount of Each Receipt this Period
A. Full Name, Mailing Address and ZIP Code Ernest Wadsworth 311 Pine Street Johnstown, PA 15902 Receipt For: X Primary ☐ General ☐ Other (specify):	Occupation: Retired Aggregate Year-to-Date: $ 150.00	3/15/84	$ 150.00
B. Full Name, Mailing Address and ZIP Code Jeanne C. Griffith 8 North Hamilton Avenue Greensburg, PA 15601 Receipt For: X Primary ☐ General ☐ Other (specify):	Name of Employer: County of Westmoreland Occupation: Elected Official Aggregate Year-to-Date: $ 250.00	3/15/84	$ 100.00
C. Full Name, Mailing Address and ZIP Code Rosemary Trump 338 Nature Trail Lane Murrysville, PA 15668 Receipt For: X Primary ☐ General ☐ Other (specify):	Name of Employer: Service Employees International Union Occupation: Executive Officer Aggregate Year-to-Date: $ 350.00	3/15/84	$ 100.00
D. Full Name, Mailing Address and ZIP Code Blair Pawlowski South Center Street Ebensburg, PA 15931 Receipt For: X Primary ☐ General ☐ Other (specify):	Name of Employer: Self-employed Occupation: Attorney Aggregate Year-to-Date: $ 450.00	3/16/84	$ 100.00
E. Full Name, Mailing Address and ZIP Code Central Westmoreland County Labor Union Council AFL-CIO, P. O. Box 2 Greensburg, PA 15601 Receipt For: X Primary ☐ General ☐ Other (specify):	Name of Employer: N/A Occupation: Aggregate Year-to-Date: $ 550.00	3/20/84	$ 100.00
F. Full Name, Mailing Address and ZIP Code Service Employees International Union, AFL-CIO/CLC, Cope Fund 2020 K St., N. W. Washington, DC 20006 Receipt For: X Primary ☐ General ☐ Other (specify):	Name of Employer: N/A Occupation: Aggregate Year-to-Date: $ 1,550.00	3/20/84	$1,000.00
G. Full Name, Mailing Address and ZIP Code Helen K. Whiteford Johnstown, PA 15901 Receipt For: X Primary ☐ General ☐ Other (specify):	Name of Employer: United Mine Workers of America Occupation: Secretary Aggregate Year-to-Date: $ 1,650.00	3/26/84	$ 100.00
SUBTOTAL of Receipts This Page (optional)			$1,650.00
TOTAL This Period (last page this line number only)			

85040500725

SCHEDULE A **ITEMIZED RECEIPTS**

Page ___ of ___ Pages
LINE NUMBER ___
Use separate schedule(s) for each category of the Detailed Summary Page

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

Name of Committee (in Full)
Mondale Delegate Committee--12th Congressional District

A. Full Name, Mailing Address and ZIP Code United Mine Workers of America Political Action Committee Voluntary Contribution Fund Washington, DC 20006 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer N/A Occupation Aggregate Year-to-Date--$ 6,650.00	Date (month, day, year) 3/26/84	Amount of Each Receipt this Period $5,000.00
B. Full Name, Mailing Address and ZIP Code William H. Kerr 303 South Warren Avenue Apollo, PA 15613 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Kiski Area School District Occupation Teacher Aggregate Year-to-Date--$ 6,750.00	Date (month, day, year) 3/30/84	Amount of Each Receipt This Period $ 100.00
C. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date--$	Date (month, day, year)	Amount of Each Receipt This Period
D. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date $	Date (month, day, year)	Amount of Each Receipt This Period
E. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date - $	Date (month, day, year)	Amount of Each Receipt This Period
F. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date $	Date (month, day, year)	Amount of Each Receipt This Period
G. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date $	Date (month, day, year)	Amount of Each Receipt This Period
SUBTOTAL of Receipts This Page (optional)			$5,100.00
TOTAL This Period (last page this line number only)			$6,750.00

85040500726

SCHEDULE B **ITEMIZED DISBURSEMENTS**

Page 1 of 3 for
LINE NUMBER
(Use separate schedule(s) for each category of the Detailed Summary Page)

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

Name of Committee (in Full)

Mondale Delegate Committee--12th Congressional District

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Ivan Young Greensburg, PA 15601	Rental Fee Greensburg Headquarters Disbursement for: [X] Primary [ ] General [ ] Other (specify):	3/16/84	$ 300.00
B. Full Name, Mailing Address and ZIP Code Commercial Printing Company 310 Beaver Street Greensburg, PA 15601	Purpose of Disbursement Printing of Delegate Cards Disbursement for: [X] Primary [ ] General [ ] Other (specify):	Date (month, day, year) 3/20/84	Amount of Each Disbursement This Period $ 514.10
C. Full Name, Mailing Address and ZIP Code Kenneth Hilty 213 First Street Apollo, PA 15613	Purpose of Disbursement Rental Fee Apollo Headquarters Disbursement for: [X] Primary [ ] General [ ] Other (specify):	Date (month, day, year) 3/21/84	Amount of Each Disbursement This Period $ 125.00
D. Full Name, Mailing Address and ZIP Code Dan Salerno 24Nesuts Street New Britain, Conn. 06053	Purpose of Disbursement Travel expenses Disbursement for: [X] Primary [ ] General [ ] Other (specify):	Date (month, day, year) 3/24/84	Amount of Each Disbursement This Period $ 204.40
E. Full Name, Mailing Address and ZIP Code Bell of Pennsylvania Gateway Center 201 Stanwix Street Pittsburgh, PA 15222	Purpose of Disbursement Telephone Installation Greensburg Headquarters Disbursement for: [X] Primary [ ] General [ ] Other (specify)	Date (month, day, year) 3/26/84	Amount of Each Disbursement This Period $ 600.00
F. Full Name, Mailing Address and ZIP Code Dan Salerno 24 Nesuts Street New Britain, Conn. 06053	Purpose of Disbursement Per Diem Disbursement for: [X] Primary [ ] General [ ] Other (specify):	Date (month, day, year) 3/26/84	Amount of Each Disbursement This Period $ 250.00
G. Full Name, Mailing Address and ZIP Code Roy Arsenault 6 Jolly Lane Londonderry, NH 03053	Purpose of Disbursement Per Diem Disbursement for: [X] Primary [ ] General [ ] Other (specify):	Date (month, day, year) 3/26/84	Amount of Each Disbursement This Period $ 150.00
H. Full Name, Mailing Address and ZIP Code Steve Barnes Rt #1, Box 72 Yarmouth, ME 04096	Purpose of Disbursement Per Diem Disbursement for: [X] Primary [ ] General [ ] Other (specify):	Date (month, day, year) 3/26/84	Amount of Each Disbursement This Period $ 225.00
I. Full Name, Mailing Address and ZIP Code Thomas Tremble 119 Cedar (#9) Bangor, [illegible] 04401	Purpose of Disbursement Per Diem Disbursement for: [X] Primary [ ] General [ ] Other (specify):	Date (month, day, year) 3/26/84	Amount of Each Disbursement This Period $ [illegible]
SUBTOTAL of Disbursements This Page (optional)			2,515.50
TOTAL This Period (last page this line number only)			

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SCHEDULE B **ITEMIZED DISBURSEMENTS**

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)
Mondale Delegate Committee--12th Congressional District

	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Full Name, Mailing Address and ZIP Code Chris Crowley 6 Cleveland Place Boston, MA 02113	Per Diem Disbursement for: X Primary ☐ General ☐ Other (specify):	3/26/84	$ 250.00
B. Full Name, Mailing Address and ZIP Code Chris Crowley 6 Cleveland Place Boston, MA 02113	Purpose of Disbursement Petty Cash Greensburg Headquarters Disbursement for: X Primary ☐ General ☐ Other (specify):	Date (month, day, year) 3/26/84	Amount of Each Disbursement This Period $ 50.00
C. Full Name, Mailing Address and ZIP Code General Telephone Co. 421 Locust Street Johnstown, PA 15901	Purpose of Disbursement Telephone Installation Johnstown Headquarters Disbursement for: X Primary ☐ General ☐ Other (specify):	Date (month, day, year) 3/26/84	Amount of Each Disbursement This Period $ 200.00
D. Full Name, Mailing Address and ZIP Code Mondale Delegate Committee 7th Congressional District Provident National Bank Philadelphia, PA 19101	Purpose of Disbursement Temporary Transfer Disbursement for X Primary ☐ General ☐ Other (specify):	Date (month, day, year) 3/26/84	Amount of Each Disbursement This Period $1,209.00
E. Full Name, Mailing Address and ZIP Code Mondale Delegate Committee 18th Congressional District One Oxford Center Pittsburgh, PA	Purpose of Disbursement Temporary Transfer Disbursement for X Primary ☐ General ☐ Other (specify)	Date (month, day, year) 3/30/84	Amount of Each Disbursement This Period $ 500.00
F. Full Name, Mailing Address and ZIP Code Steve Barnes RR #1, Box 72 Yarmouth, ME 04096	Purpose of Disbursement Travel Expenses Disbursement for: X Primary ☐ General ☐ Other (specify):	Date (month, day, year) 3/31/84	Amount of Each Disbursement This Period $ 43.75
G. Full Name, Mailing Address and ZIP Code Chris Crowley 6 Cleveland Place Boston, MA 02113	Purpose of Disbursement Travel Expenses Disbursement for: X Primary ☐ General ☐ Other (specify):	Date (month, day, year) 3/31/84	Amount of Each Disbursement This Period $ 243.21
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			$2,495.96
TOTAL This Period (last page this line number only)			$5,089.46

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SCHEDULE C
(Revised 3/80)

GUARANTEED OUTSTANDING CONTRIBUTIONS

XXXXXXX

Page 1 of C for LINE NUMBER ____
(Use separate schedules for each numbered line)

Name of Committee (in Full)
Mondale Delegate Committee--12th Congressional District

A. Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Cumulative Payment To Date	Balance Outstanding at Close of This Period
- N/A	N/A	N/A	N/A

Election: X Primary ☐ General ☐ Other (specify)
Terms: Date Incurred N/A Date Due 4/84 Interest Rate N/A % (apr) ☐ Secured

List All Endorsers or Guarantors (if any) to Item A

1. Full Name, Mailing Address and ZIP Code United Steel Workers of America Political Action Fund Five Gateway Center Pittsburgh, PA 15222	Name of Employer N/A Occupation N/A Amount Guaranteed Outstanding $ 2,000.00	
2. Full Name, Mailing Address and ZIP Code James J. Manderino Campaign Fund Committee Harrisburg, PA 17101	Name of Employer N/A Occupation N/A Amount Guaranteed Outstanding $ 1,000.00	
3. Full Name, Mailing Address and ZIP Code Murtha For Re-election Committee 304 Fisher Building Johnstown, PA 15901	Name of Employer N/A Occupation N/A Amount Guaranteed Outstanding $ 1,000.00	

B. Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Cumulative Payment To Date	Balance Outstanding at Close of This Period

Election: ☐ Primary ☐ General ☐ Other (specify)
Terms: Date Incurred ____ Date Due ____ Interest Rate ____ % (apr) ☐ Secured

List All Endorsers or Guarantors (if any) to Item B

1. Full Name, Mailing Address and ZIP Code Delegate Endorsers and Guarantors attending rallies.	Name of Employer N/A Occupation Amount Guaranteed Outstanding $ 874.75	
2. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding $	
3. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding $	

SUBTOTALS This Period This Page (optional)	$4,874.75
TOTALS This Period (last page in this line only)	

Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.

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SCHEDULE D
(Revised 3/80)

DEBTS AND OBLIGATIONS
Excluding Loans

Page 1 of 2 for LINE NUMBER _____
(Use separate schedules for each numbered line)

Name of Committee (in Full) Mondale Delegate Committee 12th Congressional District	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor Valley Printing 667 Main Street Johnstown, PA 15901	-0-	$1,955.00	-0-	$1,955.00
Nature of Debt (Purpose): *Campaign Literature				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor Moyer Printing 500 S. Fourth Street Jeannette, PA 15644	-0-	$ 100.70	-0-	$ 100.70
Nature of Debt (Purpose): Campaign Literature				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor Buhl Bros. Printing Box 488, R. D. #2 New Kensington, PA 15608	-0-	$ 581.60	-0-	$ 581.60
Nature of Debt (Purpose): Campaign Literature				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor Greensburg Commercial Printing Co. 310 Beaver Street Greensburg, PA 15601	-0-	$ 395.38	-0-	$ 395.38
Nature of Debt (Purpose): Campaign Literature				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor Budget Rent-A-Car Greensburg, PA 15601	-0-	$ 362.55	-0-	$ 362.55
Nature of Debt (Purpose): dental Vehicles				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor Kiski Valley Leasing Co. Box 296 Apollo, PA 15613	-0-	$1,169.58	-0-	$1,169.58
Nature of Debt (Purpose): Rental Vehicles				
1) SUBTOTALS This Period This Page (optional)				$4,364.81
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)				

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SCHEDULE D
(Revised 3/80)

DEBTS AND OBLIGATIONS
Excluding Loans

Page 2 of D for
LINE NUMBER ____
(Use separate schedules for each numbered line)

Name of Committee (in Full)	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
Mondale Delegate Committee 12th Congressional District				
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor Penn Typewriter Exchange 528 Franklin Street Johnstown, PA 15901	-0-	$ 9.54	-0-	$ 9.54
Nature of Debt (Purpose): Typewriter Rental				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor Johnstown Regional Central Labor Council 229 Bedford Street Johnstown, PA 15901	-0-	$ 50.00	-0-	$ 50.00
Nature of Debt (Purpose): Delegate Campaign Ad				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor Alltel Penna., Inc. Arch Street Kittanning, PA 16201	-0-	$ 600.00 (estimated)	-0-	$ 600.00 BILL $536.73 NOT PAID
Nature of Debt (Purpose): Telephone-Apollo Headquarters				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor Bell of Pennsylvania Gateway Center 201 Stanwix Street Pittsburgh, PA 15222	-0-	$ 600.00 (estimated)	-0-	$ 600.00
Nature of Debt (Purpose): Telephone-- Greensburg Headquarters				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor General Telephone Co. 421 Locust Street Johnstown, PA 15901	-0-	$ 600.00 (estimated)	-0-	$ 600.00 BILL $375.30 NOT PAID
Nature of Debt (Purpose): Telephone-- Johnstown Headquarters				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor Chris Crowley Steve Barnes Thomas Tremble Roy Arsenault Dan Salerno	-0-	$2,576.97	-0-	$2,576.97 PAID
Nature of Debt (Purpose): Per Diem Workers/Travel				
1) SUBTOTALS This Period This Page (optional)				$4,436.42
2) TOTAL This Period (last page this line only)				$8,801.25
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)				

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PEPPER, HAMILTON & SCHEETZ
TWENTIETH FLOOR
THE FIDELITY BUILDING
PHILADELPHIA, PA. 19109



PEPPER, HAMILTON & SCHEETZ
ATTORNEYS AT LAW
2001 FIDELITY BUILDING
123 SOUTH BROAD STREET
PHILADELPHIA, PA. 19109

TO

Stephen Mims, Esquire
General Counsel's Office
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

CERTIFIED
P 308 263 053
MAIL

RECEIVED AT THE FEC
84 MAY 1 AM 8:48

PEPPER, HAMILTON & SCHEETZ

ATTORNEYS AT LAW

1777 F STREET, N.W.
WASHINGTON, D.C. 20006
202-842-0100

10 SOUTH MARKET SQUARE
HARRISBURG, PA 17108
717-255-1155

100 RENAISSANCE CENTER
DETROIT, MI 48243
313-259-7110

20TH FLOOR
THE FIDELITY BUILDING
123 SOUTH BROAD STREET
PHILADELPHIA, PENNSYLVANIA 19109
215-563-2000
CABLE ADDRESS "PEPFIL PHILADELPHIA"
TELECOPIER (G4&5) 215-732-0038 · (G200) 215-568-8804
DEX (G 2100) 215-568-3477 · TWX 710-670-0777

633 SOUTH OLIVE STREET
LOS ANGELES, CA 90014
213-617-8151

512 HAMILTON STREET
ALLENTOWN, PA 18101
215-434-0104

SIX CORPORATE PARK DRIVE
WHITE PLAINS, NY 10604
914-694-4600

WRITER'S DIRECT DIAL NUMBER

May 29, 1984

MUR 1667 — Mims

84 MAY 31 PM 1:23

Stephen Mims
General Counsel's Office
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: Americans with Hart, Inc. v. Mondale for President Committee, Inc. MUR 1667.

Dear Mr. Mims:

Enclosed please find a copy of the Statement of Designation of Counsel submitted in behalf of the Mondale Delegate Committee -- 12th Congressional District, William H. Kerr, Treasurer.

Yours truly,

JAMES M. BECK
Attorney for WILLIAM H. KERR.
TREASURER, MONDALE DELEGATE
COMMITTEE -- 12th CONGRESSIONAL
DISTRICT.

JMB: ljk
Enclosure

8504007333

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1667

NAME OF COUNSEL: PETER HEARN & JAMES M. BECK

ADDRESS: PEPPER, HAMILTON and SCHEETZ
2001 THE FIDELITY BUILDING
123 SOUTH BROAD STREET
PHILADELPHIA, PA 19103

TELEPHONE: (215) 893-3000

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.

5/20/84
Date

William H. Kerr
Signature

MONDALE DELEGATE COMMITTEE -- 12th CONGRESSIONAL DISTRICT

RESPONDENT'S NAME: WILLIAM H. KERR, TREASURER

ADDRESS: 303 SOUTH WARREN AVENUE
APOLLO, PA 15613

HOME PHONE: (412) 478-3330

BUSINESS PHONE:

RECEIVED MAY 21 1984

8504050073 4

PPER, HAMILTON & SCHEETZ
20TH FLOOR
THE FIDELITY BUILDING
123 SOUTH BROAD STREET
PHILADELPHIA, PA. 19109

THE FEC
84 MAY 1 A8:48

Stephen Mims
General Counsel's Office
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

FEC
84 MAY 25 A 9:57

PEPPER, HAMILTON & SCHEETZ

ATTORNEYS AT LAW

1777 F STREET, N.W.
WASHINGTON, D.C. 20006
202-842-8100

10 SOUTH MARKET SQUARE
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717-255-1155

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TELECOPIER (#488) 215-732-8029 · (#ECC) 215-988-0884
DEX (#4100) 215-546-3477 · TWX 710-670-0777

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512 HAMILTON STREET
ALLENTOWN, PA 18101
215-434-0104

SIX CORPORATE PARK DRIVE
WHITE PLAINS, NY 10604
914-694-4500

ECC #3314

WRITER'S DIRECT DIAL NUMBER

(215) 893-3000

May 24, 1984

VIA FEDERAL EXPRESS

Stephen Mims, Esquire
General Counsel's Office
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: Americans with Hart, Inc. v. Mondale for President Committee, Inc., MUR 1667

Dear Mr. Mims:

Jim Beck and I have been approached by several Mondale district delegate committees in Pennsylvania and have been asked to represent them now that they have been served in the above-captioned matter. In addition to these committees mentioned in Jim's letters of May 18, we have received materials from three more such committees, the Third, Twelfth, and Nineteenth District Delegates for Mondale. We may receive materials from a number of others. Enclosed is a statement of designation of counsel for the Nineteenth District committee.

We do not know how many of these committees our firm will eventually represent, nor do we have any idea how long it will take for the necessary materials to reach us. Your mailings to the district committees appear to have been received on May 14 or 15, thereby making responses due on May 29 or 30.

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While we appreciate the Commission's general view regarding extensions, we believe that an extension, until June 15, for the responses of the Pennsylvania district delegate committees is warranted. In light of the peripheral involvement of the district committees in this matter, grant of the requested extension would not hinder the Commission's deliberations. This extension would allow us to ensure that any charges against the district delegate committees are responded to in a complete and orderly fashion even as to latecomers.

Thank you for your consideration of this request. Please advise me as soon as possible of the Commission decision.

Yours truly,

Susan M. Harrison

Susan M. Harrison

SMH/lk

Enclosure

8504050007 37

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

William H. Kerr, Treasurer
Mondale Delegate Committee -
12th Congressional District
303 South Warren Avenue
Apollo, PA 15613

Re: MUR 1667

Dear Mr. Kerr:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

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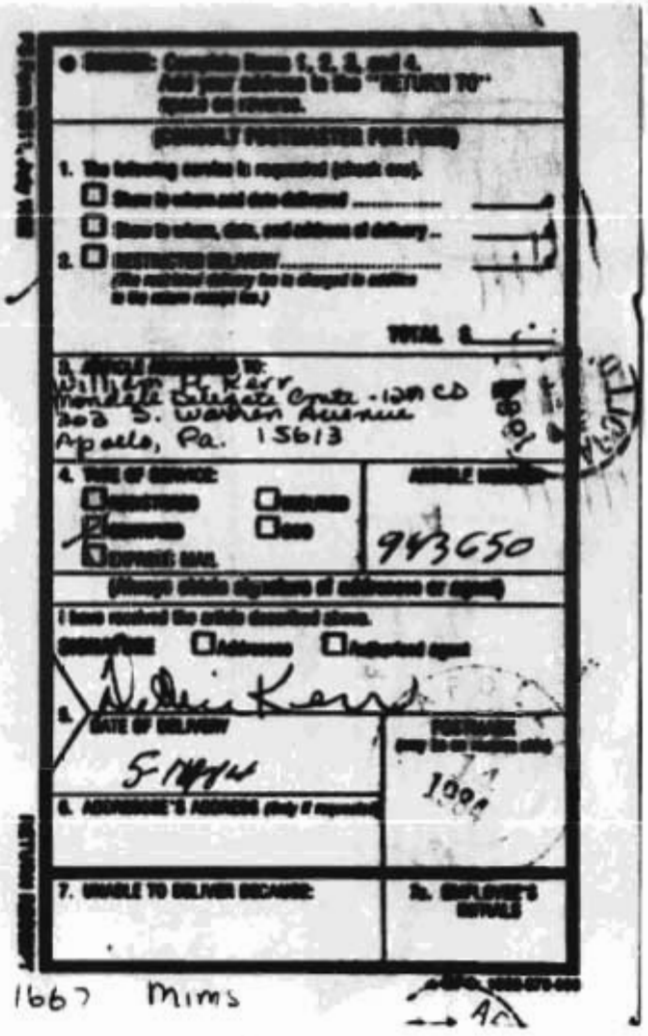
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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



8504050359

FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

TO: Clerk DATE:

FROM: Lois

- ☐ APPROVAL
- ☐ AS REQUESTED
- ☐ CONCURRENCE
- ☐ CORRECTION
- ☐ FILING
- ☐ FULL REPORT
- ☐ HANDLE DIRECT
- ☐ ANSWER OR ACKNOWLEDGE ON OR BEFORE _____
- ☐ PREPARE REPLY FOR THE SIGNATURE OF _____
- ☐ IMMEDIATE ACTION
- ☐ INITIALS
- ☐ NECESSARY ACTION
- ☐ NOTE AND RETURN
- ☐ PER OUR CONVERSATION
- ☐ PER TELEPHONE CONVERSATION
- ☐ RECOMMENDATION
- ☐ SEE ME
- ☐ SIGNATURE
- ☐ YOUR COMMENT
- ☐ YOUR INFORMATION
- ☐

REMARKS:

Please circulate to Commission for their info

Thanx

8502405007 1

U.S. G.P.O. 1984-430-928/6224

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary

FROM: Office of General Counsel

DATE: December 24, 1984

SUBJECT: MUR 1704 - Letter from Weinberg

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

Open Session _____

Closed Session _____

CIRCULATIONS		DISTRIBUTION	
48 Hour Tally Vote	[ ]	Compliance	[X]
Sensitive	[ ]		
Non-Sensitive	[ ]	Audit Matters	[ ]
24 Hour No Objection	[ ]	Litigation	[ ]
Sensitive	[ ]		
Non-Sensitive	[ ]	Closed MUR Letters	[ ]
Information	[X]	Status Sheets	[ ]
Sensitive	[X]		
Non-Sensitive	[ ]	Advisory Opinions	[ ]
Other	[ ]	Other (see distribution below)	[ ]

8504050074 1

RECEIVED AT THE FEC

Case #3561

8 [illegible]

Dear Sir:

This letter is in response to registered mail Re Mur 1704 that I Mr Mc Hugh received on Sat June 2nd I volunteered to serve on the Mondale Committee as Treasurer for the Louisiana Delegates for Mondale and believe me I am sorry I will think twice the next time because with all this registered mail its frightening.

I served as treasurer for one (1) Fund Raiser for the delegates which you have in your possession my last report. The highest Contribution for breakfast tickets was (1) Hundred dollars and I have in my possession every name and address of each person who attended the breakfast also the Stubs. We realized a little over $2,000 before expenses and after the expenses were paid we ended up with $823 and cents then after I had Registered Mail to pay also postage and etc and the bal which is in my final report was devided between all delegates with names and addresses on my final report to be used as expenses for the convention I spoke to the Federal Election Commission

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to see if I could devide the money to the delegates for expenses for Convention and they gave me the O.K. also I spoke to Counsel Stephens Memg and made him aware of what I had done. Any further questions that I can help with I will certainly do. But at no time did I expend any monies for Mondale. I had no Headquarters nor were there any paid people. I would'nt even allow balloons for Mondale. I hope I have done everything that was in Conformity with the Federal Election Commission. I am a greenhorn at all of this only I tried my best. I have no title I am only an average citizen who has been really educated with all this Registered Materials furnished to me. As I've said we only had (1) one fundraiser a breakfast $10 per ticket $3 for Children and that was the extent of my Contributions to the delegates. I feel its certainly informative and the questions asked should be - as if nothing else it will educate a lot of unexperienced people It did me. But at no time have I violated any rules.

Sincerely Yours
Mrs Mc Hugh
11 Bryden St Pittsto Pa
18640

Delegate
Treasurer for Mondale
11th Congressional District
Penna.

8504050007743

P.S. When I wanted to enquire about closing the account which you asked me to do but the beginning then I two days later I received your mail telling me I could end my report but you traveled & unable to terminate my report. Well anyway Attorney Joseph Musso Chapel Place Pittston called the Federal Elections Commission to ask the question about the awarding of monies as expenses for the convention & they told him it was O.K. That was my only unanswered question. As I've said I feel I have done nothing wrong & if I have it was not deliberate nor was I aware of it & I am sure this will be my last time to volunteer my services who needs it; at my age its all scary. Thanks for listening this you don't read letters

Sincerely
Mae M. Hughes

If you wish name & address of the people who purchased the 10 tickets & the 3 tickets I will forward that info to you at once.

8504050007744

Federal Election Commission
Washington DC. 20463

Re Mur 1704.
Attorneys
Stephens Mims et al
Kenneth A. Gross - Counsel

8504050074 5

8 3 3 4 0 5 0 0 7 4 6



Jeanne Kenneth A. Gross
Federal Election Commission
Washington D.C. 20463

Re Mur
1704.

CERTIFIED
P 754 132 105
MAIL

RETURN RECEIPT
REQUESTED

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mae McHugh, Treasurer
11th Congressional Delegates
for Mondale
11 Bryden Street
Pittston, PA 18640

Re: MUR 1667

Dear Ms. HcHugh:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

8504050074 7

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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



8574050074 8

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Joseph M. Cognetti, Treasurer
10th Congressional District
Mondale Delegate Committee
520 Spruce Street
Scranton, PA 18503

Re: MUR 1667

Dear Mr. Cognetti:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against the committee and you, as treasurer, 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.

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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.

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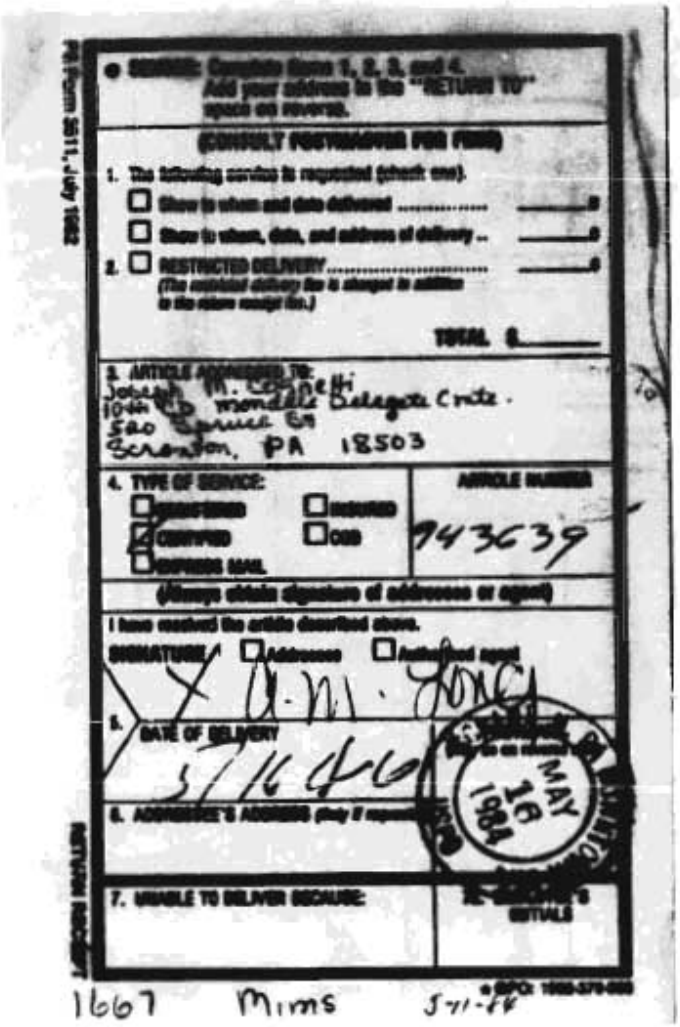
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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



1667 Mims 571-86

8574050070350

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Gerard S. Ziegler, Treasurer
Ninth Congressional District
Delegates For Mondale
3332 Broad Avenue
Altoona, PA 16601

Re: MUR 1667

Dear Mr. Ziegler:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

8504005075 1

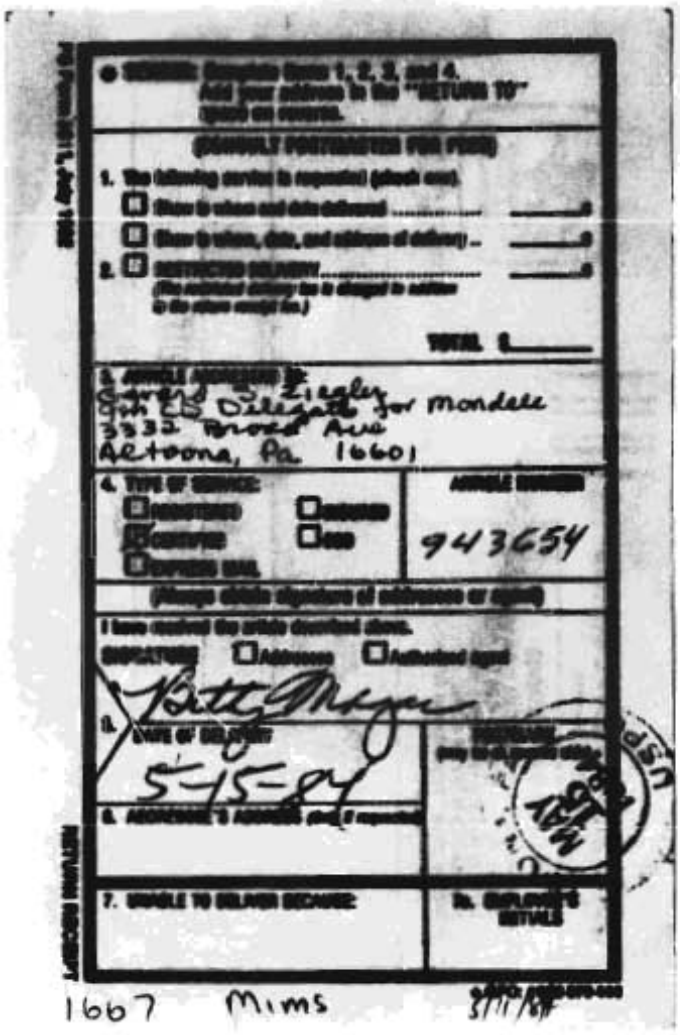
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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



8504005052

RECEIVED
FEC MAIL CENTER
3797
84 JUN 25 PM 2:50

LAW OFFICES
Mellon and Mellon

THOMAS E. MELLON, JR.
ROBERT J. MELLON
SARA WEBSTER

50 EAST COURT STREET
DOYLESTOWN, PENNSYLVANIA 18901
(215) 348-7700

June 20, 1984

Stephen Mims, Esquire
General Counsel's Office
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

RE: The National Right To Work Committee, et al
v. Walter F. Mondale and Mondale For
President Campaign Committee, et al
No. MUR 1704

Dear Mr. Mims:

Please allow this letter to serve as the response of the Eighth Congressional District Delegates For Mondale Campaign Committee to the complaint in the above-captioned matter. We have no involvement whatsoever with any of the allegations contained in the aforesaid complaint. As counsel for the 8th District Committee, I believe we have sufficiently responded to this entire matter in general in our May 30 letter to you and I incorporate the same as though fully set forth herein.

Very truly yours,

THOMAS E. MELLON, JR.

TEM:jan
CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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LAW OFFICES

Miller and Miller

90 EAST COURT STREET

BUTLERTOWN, PENNSYLVANIA 18001

RECEIVED AT

84 JUN 25 P12:59

Stephen Mims, Esquire
General Counsel's Office
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

CERTIFIED

P 224 074 753

MAIL

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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MUR 1667
RECEIVED AT THE FEC
84 JUN 4 P1:28

LAW OFFICES
Mellon and Mellon

THOMAS B. MELLON, JR.
ROBERT J. MELLON
SARA WEBSTER

84 JUN 4 P3:31

80 EAST COURT STREET
DOYLESTOWN, PENNSYLVANIA 18901
(215) 348-7700

May 30, 1984

Stephen Mims, Esquire
General Counsel's Office
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

RE: Americans with Hart, Inc. v. Mondale for President Committee, Inc., MUR 1667

Dear Mr. Mims:

Please allow this letter to serve as the response of the Pennsylvania 8th Congressional District Delegates for Mondale Campaign Committee ("8th District Committee" or "Committee") to the allegations contained in the amended complaint filed with the Federal Election Commission ("FEC") by complainant, Americans with Hart, Inc. ("Hart") against respondent, Mondale for President Committee, Inc. ("MPC" or "Mondale campaign". I am the treasurer of the 8th District Committee. The 8th District Committee has no firsthand information about the activities of MPC, Mondale delegate committees in other states, or other Mondale district delegate committees in Pennsylvania. Consequently, this submission will respond only to those charges alleging that certain actions of the 8th District Committee were either illegal or created an affiliation between the 8th District Committee and MPC.

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Before addressing these charges, some knowledge of the Pennsylvania delegate selection procedures is helpful. The procedure in Pennsylvania for delegate selection in 1984 was entirely changed from previous elections. Prior to 1984, delegates were apportioned in rough proportion to the popular vote received by presidential candidates in each congressional district. In 1984, however, delegates were directly elected. Thus, the success of Walter Mondale as a presidential candidate did not automatically carry over to his pledged delegates. Hart's allegations should be examined in light of the character of Pennsylvania's delegate selection procedure.

I. Formation

The 8th District Committee was organized by the local delegate candidates on April 2, 1984. No FEC registration number was received until after the election. The delegate candidates had received form letters from the Mondale campaign explaining how to organize and file reports for delegate committees, however, they were not told by MPC to form the Committee. The delegate candidates had been informed that Mr. Mondale's statewide strategy did not include assisting the election of individual delegates. Rather, responsibility

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for the organization and financing of all grassroots activities -- printing and distribution of slate ("palm") cards, leafletting, etc. -- fell entirely to the delegates. These activities are completely proper under the FEC's regulations. See 11 C.F.R. §110.13(d)(2)(i).

II. Staffing; Activities

Considering its lack of familiarity with the new delegate selection procedure and its severe limitations on money and time, the 8th District Committee was fortunate to have the assistance of Mondale volunteers during the time immediately prior to the primary. They were remunerated on a per diem subsistence basis. Such payment by the Committee does not violate federal election law. See attached Exhibit "A".

The extent, if any, of previous affiliation between these volunteers and the Mondale campaign is not known. Furthermore, MPC had no power or control over the members of the 8th District Committee. See 11 C.F.R. §100.5(g)(2)(ii). As Treasurer of the Committee, I have no connection to Mondale's campaign.

There has been no impermissible influence by MPC on any action of the 8th District Committee, and Hart points to

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none. All printed materials were designed by the Committee itself. The Committee did no public advertising. The Committee did not participate in any of MPC's advertisements. The prior work history of one volunteer, cannot by itself suffice to constitute "affiliation" between the 8th District Committee and MPC.

III. Contributions to the 8th District Committee

The 8th District Committee received a total of $3,660.00. in contributions, none of which came from political action committees. See Exhibit "A" attached.

IV. Contributions by the 8th District Committee

The 8th District Committee made no contributions to the Mondale national campaign, to the state at-large committee, or to other district delegate committees, either within Pennsylvania or in other states.

V. Conclusion

For the reasons set forth in this response, the Commission should find no reason to believe that the 8th District Committee has violated the Federal Election Campaign.Act.

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If there are any further questions or comments on the above, please do not hesitate to contact me.

Respectfully submitted,

THOMAS E. MELLON, JR., ESQUIRE
50 East Court Street
Doylestown, Pennsylvania 18901

Treasurer, Eighth District
Committee

TEM:jan
CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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MONEY RECEIVED

Donator	Amount
Mr. Ray Regan	$ 5.00
PA Delegates-At-Large	2,000.00
Mr. and Mrs. Robert Valimont	150.00
Mr. Milt Berkes	300.00
Mr. William Heefner	300.00
Mr. Thomas E. Mellon, Jr.	250.00
Committee to Elect Greg Mondjack	30.00
Ms. Bernadette Cook	30.00
Ms. Kathleen Hodgkinson	30.00
Mr. Joseph Catania	30.00
Ms. Carol Palatucci	30.00
Mr. Daniel Driscoll	30.00
Ms. Adele Hanna	30.00
Mr. William G. Major	100.00
Mr. Eugene Kellis	240.00
Mr. Edward L. McGill	30.00
Mr. and Mrs. Benjamin Tillman	60.00
Unidentified High School Student	15.00
TOTAL MONEY RECEIVED	$3,660.00

MONEY DISBURSED

Creditor	Amount
Julie King (on staff) for per diem & gas	$ 331.00
Rich Hancock (on staff) for per diem & gas	186.50
Susan Ades (on staff) for per diem	126.00
Levittown Printers	1,060.00
C.F.R. Leasing (for car rental)	600.00
Hilton Hotel	479.46
Rich Hancock (on staff) for per diem	100.00
Susan Ades (on staff) for per diem	100.00
Scott Dolley (on staff) for per diem	100.00
Cathy Cushman (on staff) for per diem	80.00
Stewart Henderson (on staff) for per diem	80.00
Ken Payne (on staff) for per diem	80.00
Julie King (on staff) for per diem	100.00
TOTAL MONEY DISBURSED	$3,422.96

EXHIBIT "A"

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LAW OFFICES
Mellon and Mellon
50 EAST COURT STREET
DOYLESTOWN, PENNSYLVANIA 18901

84 JUN 4 PM 2:21

Stephen Mims, Esquire
General Counsel's Office
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

CERTIFIED
P 284 074 747
MAIL

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

RETURN RECEIPT REQUESTED

FEC

84 JUN 27 A 8:39

JANICE M. SAWICKI
ATTORNEY AT LAW
117 NORTH MONROE STREET
P. O. BOX 87
MEDIA, PENNSYLVANIA 19063
AREA CODE 215
565-4463

GCC #3831

June 25, 1984

Stephen Mims, Esquire
General Counsel's Office
Federal Election Commission
1325 K Street, NW
Washington, D.C. 20463

Re: The National Right to Work Committee, et al
v. Mondale, et al MUR 1704

Dear Mr. Mims:

This letter and the supporting exhibits constitute the response of the Seventh Congressional District Mondale Delegates ("the Committee") to the factual allegations concerning it, whcih have been made by complainants, The National Right to Work Committee, et al, ("RTW") in the above captioned matter. To the extent the Complaint alleges that the Committee was affiliated with Mr. Walter Mondale or his campaign committee (collectively "Mondale campaign"), such charges were exhaustively refuted by the Committee in its May 29, 1984 submission in Americans with Hart, Inc. v. Mondale for President Committee, Inc. , MUR 1667, which is attached hereto as Exhibit "A" and incorporated as though set forth in full herein. The Committee is responding to the Complaint solely to refute the factual allegations about it.

Apparently RTW infiltrated the Committee's operations with at least three (3) private investigators who claimed to be volunteers. Their affidavits demonstrate the complete absence of any affiliation between the Committee and any other organization. It is also clear from the affidavits that the Committee was engaged in only the types of volunteer activities permitted to a delegate committee under the Commission's rules.

The affidavits on which the Complaint is based are nothing but speculation, as witnessed by the copious use of terms such as "seemed" and "appeared". They also attempt to draw conclusions from snippets of conversations which the affiants claim to have overheard. The Complaint seems to imply that the Committee was connected with the Upper Darby Democratic Committee, ("UDDC"). While the Committee did use UDDC's offices, it did so under an agreement whereby the Committee paid its share of the rent. The same terms had been offered to the Hart campaign, but Hart turned down the offer.

RTW's investigators attach completely unwarranted significance to certain Mondale Campaign pins in the shape of Pennsylvania. The pins are inaccurately described as having black lettering, when, in fact, the lettering was blue. See Exhibit "B". These pins had been for sale to anyone who wanted

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one for $ 1.00 or $ 2.00. The supply had been exhausted before RTW's investigators arrived. The pins did not originate with the Committee and they signified absolutely nothing regarding who was on the Committee staff.

The Committee admits that it had union support. However, union support does not translate to union affliliation. Even assuming that it would be possible under the Federal Election Commission Act for an affiliation to exist between a multicandidate committee and a candidate committee of any sort, RTW's claim fails because none of the factors constituting grounds for affiliation under 11 C.F.R. section 100,5 (g)(2)(ii) have been proven.

RTW's claim regarding the Committee's receipt of contributions is based on the aggregation of contributions from various union sources from the Committee's perspective, these unions have always appeared to be separate and independent. They certainly have never attempted to exercise any control over the Committee's operations. The reference to a flyer containing the phrase "labor donated" is misleading. This phrase is common political parlance and means only that the printers and designers who produced the flyer worked gratuitously. It was intended to explain the lack of union insignia on the flyer, since union wages were not paid, and avoid charges that the flyer was printed using non-union labor. The phrase does not indicate that the flyer itself was donated by a labor union. Finally, the speculation that a certain "Randy" who allegedly stopped by the office for a few minutes was Randy Canale, a labor official, is unfounded. Mr. Canale is much taller than the individual described and is not "heavy set".

RTW investigators evidently met three of the Committee's staff: Cathy Tapella, Mike Hackman and Adrianne Moss. All received per diem subsistance payments from the Committee but otherwise received no compensation. These payments were reimbursement, not salaries, which probably accounts for the comment regarding "low" pay. Contrary to the Carino affidavit, Mr. Hackman was a local recruit, as he was a student at Villanova University, here in Delaware County. Ms. Baulis is correctly identified as an alternate delegate, although her first name is "Nancy" not "Mary". The identities of "Randy", the"Mondale Delegate" and "the white male" described in the Priestly affidavit are unknown.

In sum, there is not a shred of evidence that the Committee violated any election law or was affiliated with any other organization. The Commission should find that there is no reason to believe that any violation of the Federal Election Campaign Act was committed by the Seventh Congressional District Mondale Delegates.

Respectfully submitted,

Janice M. Sawicki

JANICE M. SAWICKI
ATTORNEY FOR SEVENTH CONGRESSIONAL
DISTRICT MONDALE DELEGATES

JMS:hs
enclosures

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JANICE M. SAWICKI
ATTORNEY AT LAW
117 NORTH MONROE STREET
P. O. BOX 87
MEDIA, PENNSYLVANIA 19063
AREA CODE 215
565-4653

May 29, 1984

Stephen Mims
General Counsel's Office
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: Americans with Hart, Inc. v. Mondale
for President Committee, Inc., MUR 1667

Dear Mr. Mims:

This letter serves as the response of the 7th Congressional District Mondale Delegates (" the Committee") to the general allegations contained in the amended complaint filed with the Federal Election Commission ("FEC") by complainant Americans with Hart, Inc. ("Hart") against respondent Mondale for President Committee, Inc. ("MPC" or "Mondale campaign"). The Committee knows nothing first-hand about the activities of MPC, Mondale delegate committees in other states, or other Mondale district delegate committees in Pennsylvania. As a result, this submission will respond only to those charges alleging that certain of the Committee's actions were either illegal or created an affiliation between the Committee and MPC.

Before addressing these allegations, it is necessary to describe the political and legal backdrop against which the Committee operated. The 1984 procedure for delegate selection in Pennsylvania differed sharply from procedures used in previous elections. In 1980, delegates were apportioned more or less in accordance with the popular vote received by the candidates in each congressional district. The 1984 procedure, however, called for the direct election of delegates. There is therefore no necessary correlation between the success of presidential candidate Walter Mondale and the success of Mondale delegates. A Mondale delegate who relied solely on the appeal of Walter Mondale, then, would not be assured of election. Under this new dual system, many of the delegate candidates certainly would have organized something in the nature of delegate committees without any encouragement from the Mondale campaign.

In considering the Hart allegations regarding the Committee, the nature of the delegate selection procedures serves as a necessary reference point.

I. Formation

The Committee was created on March 16, 1984. See Organization Statement,

EXHIBIT "A" 6/25/84

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attached as Exhibit "A". Mondale delegate candidates in the Seventh District had been informed that, because of the new Pennsylvania delegate selection procedures, the Mondale campaign would not be devoting any resources to assist the election of individual delegates. All grass roots activities, such as leafletting, the printing and distribution of election literature, rallies, and the like, were to be done, if at all, by the delegation themselves. The delegate candidates had previously received, as a matter of course, material from the Mondale campaign regarding the legal requirements for forming a delegate committee. The allegation that the Committee was being "used" by the Mondale campaign to "take over entire sections" of the campaign, Hart April 18 Submission at 2, 3, has no validity. MPC did not "use" the Committee, on the contrary, the Mondale campaign never assumed any responsibility for these activities. Argument implicitly affirms that the Committee conducted precisely those activities allowed by the FEC's regulations. See 11 C.F.R. section 110.13 (d) (2) (i).

II. Staffing; Activities

Because direct election of delegates was new to Pennsylvania; because the Committee had few resources to actively recruit volunteers; and because it was necessary to obtain staff as quickly as possible in view of the April 10th primary, the Committee utilized the services of three experienced Mondale workers from late March until the primary. The nature of the previous affiliation between these volunteers and the Mondale campaign is not known. In addition, MPC had no power whatsoever over the members of the Committee. See 11 C.F.R. section 100.5 (g) (2) (ii). Neither Ms. Nancy Baulis, the treasurer, nor any of the delegate candidates have had any connections to Mondale's campaign.

The Committee designed its own literature and buttons. It did no public advertising of its own, nor did it share any space or time with MPC on any of the latter's advertisements. The mere prior work history of person's on the Committee's staff does not implicate any of the five affiliating factors set out in the federal regulations. See 11 C.F.R. section 100.5 (g) (2).

III. Contributions to MDCR

The Committee raised more than $ 4,000.00. See Checking Account Statements, attached as Exhibit "B". Some $ 2,200.00 of these funds came from two other Mondale delegate committees in Pennsylvania: a $ 1,000.00 contribution from the Pennsylvania At-Large Delegate Committee and a $ 1,200.00 contribution from another district committee. See Report of Receipts and Expenditures, attached as Exhibit "C". The Committee has recently been informed that the $ 1,200.00 contribution should be considered a loan.

The $ 1,000.00 PALC contribution suggests nothing about the relationship between the Committee and the Mondale campaign. The contribution is not only legal, but also makes perfect sense in light of the manner in which at-large delegates are selected in Pennsylvania. At-large delegates are apportioned on the basis of pledged delegates elected at the district level. They themselves are not on the ballot. PALC contributed the $ 1,000.00 to the Committee in order to help itself by aiding the election of the Seventh District delegates. The Mondale campaign had nothing to do with this contribution. Hart has alleged

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nothing to suggest that this $ 1,000.00 contribution should constitute a ground for a finding of affiliation under 11 C.F.R. section 100.5 (g) (2) (ii).

The Committee also accepted so-called "PAC money". The Committee ignored the express wishes of the Mondale campaign by accepting this money, and this very fact demonstrates the Committee's independence from MFC. The Committee was well aware of the position of the Mondale campaign on this issue when it received PAC contributions. The payment and acceptance of such money are clearly lawful.

IV. Contributions by MDCR

The Committee made no contributions to the Mondale national campaign, to the state at-large committee, or to other district delegate committees, either within Pennsylvania or in other states. See Exhibit "C".

V. Conclusion

For the reasons set forth in this response, the Commission should find no reason to believe that the Committee has violated the Federal Election Campaign Act.

Respectfully submitted,

JANICE M. SANICKI
ATTORNEY FOR SEVENTH CONGRESSIONAL
DISTRICT MONDALE DELEGATES

JMS:ha
enclosures

8504050007665

90 Barbara Rd.

Drexel Hill, Pa. 19026

6. TYPE OF COMMITTEE (check one):

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

Name of Candidate	Candidate Party Affiliation	Office Sought
X (a) This committee supports/opposes only one candidate: Ed Joe E Mandale (Name of candidate) and is NOT an authorized committee.		
(b) This committee is a _____ committee of the _____ Party. (National, State or subordinate) (Democratic, Republican, etc.)		

- (c) This committee is a separate segregated fund.
- (d) This committee supports/opposes more than one Federal candidate and is NOT a separate segregated fund nor a party committee.

8. Name of Any Connected Organization or Affiliated Committee	Mailing Address and ZIP Code	Relationship
None		

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

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

Full Name	Mailing Address and ZIP Code	Title or Position
Edward E Mandale		

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

Full Name	Mailing Address and ZIP Code	Title or Position
Nancy B. Baulis	90 Barbara Rd. Drexel Hill, Pa. 19026	Treasurer

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

Name of Bank, Depository, etc.	Mailing Address and ZIP Code
Provident National Bank	Hart Lane + Saxer Springfield, Pa. 19064

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

Nancy B. Baulis — Nancy B. Baulis — 3-23-8

Type or Print Name of Treasurer — SIGNATURE OF TREASURER — Date

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

For further information contact: Federal Election Commission, Toll Free 800-424-9530, Local 202-523-4068

FEC FORM 1 (

EXHIBIT "A"

8504050007-67

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

ACKNOWLEDGEMENT OF RECEIPT
OF
STATEMENT OF ORGANIZATION

Filed pursuant to the Federal Election Campaign Act of 1971, as amended

NANCY B. BAULIS, TREAS.
7TH CONGRESSIONAL DISTRICT MONDALE DELEGATES
90 BARBARA RD.
DREXEL HILL, PENNSYLVANIA 19026

DATE: 03/28/84

NOTICE REGARDING FILINGS
UNDER THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED

Your assigned FEC IDENTIFICATION NUMBER is C00180398

In the future this number should be entered on all subsequent reports filed under the Act, as well as on all communications concerning such reports and statements. This acknowledgement will be the only receipt provided directly by the Commission, for documents filed. The Commission recommends that all future filings be mailed Certified or Registered, Return Receipt Requested, in order to insure timeliness of your filings and to provide additional receipts for your records.

FEDERAL ELECTION COMMISSION

FEC FORM 20 (10/13/78)
Statement/FEC Forms 10, 14, and 19
OPO : 1980 - 320-851

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RECEIVED AT THE FEC

84 JUN 27 A9:04

REPORT OF RECEIPTS AND DISBURSEMENTS
of Political Committees Other Than an Authorized Committee

(Summary Page)

ALIEN AREA [ ] [ ] ALIEN AREA

1. Name of Committee (In Full)
7th Congressional District Mondale Delegates

Address (Number and Street)
47 Barbara Rd.

City, State and ZIP Code
Drexel Hill, Pa. 19026

[ ] Check here if address is different than previously reported.

2. FEC Identification Number
C00131391

3. [ ] This committee qualified as a multicandidate committee during this Reporting Period on _____ (Date)

4. TYPE OF REPORT (Check appropriate box(es))

(a) [X] April 15 Quarterly Report [ ] October 15 Quarterly Report
[ ] July 15 Quarterly Report [ ] January 31 Year End Report
[ ] July 31 Mid Year Report (Election Year Only)
[ ] Monthly Report for _____
[ ] Twelve day report preceding _____ (Type of Election) election on _____ in the State of _____
[ ] Thirty day report following the General Election on _____ in the State of _____
[ ] Termination Report

(b) Is this Report an Amendment?
[ ] YES [X] NO

SUMMARY

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period 3.16.84 through 4.10.84		
6. (a) Cash on hand January 1, 19 84		$ 0
(b) Cash on Hand at Beginning of Reporting Period	$ 0.	
(c) Total Receipts (from Line 16)	$ 3,555.00	$ 0
(d) Subtotal (add Lines 6(b)(c) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ 3,555.00	$ 0
7. Total Disbursements (from Line 28)	$ 1721.18	$ 0
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 1833.82	$ 0
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)	$ 0	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	$ 0	

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

Nancy B. Baulis
Type or Print Name of Treasurer

Nancy B. Baulis 4.10.84
Signature of Treasurer Date

For further information contact:
Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4068

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

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

FEC FORM 3X (3/83)

EXHIBIT "C"

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

Name of Committee (in Full): [illegible] Congressional [illegible] Committee

Report Covering the Period: From 3-16-84 To 4-10-84

	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date	
I. RECEIPTS			
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees	3555.00	0	11(a)
Memo Entry Unitemized $ 855.00			
(b) Political Party Committees	0	0	11(b)
(c) Other Political Committees	0	0	11(c)
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c))	3555.00	0	11(d)
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES	0	0	12
13. ALL LOANS RECEIVED	0	0	13
14. LOAN REPAYMENTS RECEIVED	0	0	14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	0	0	15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	0	0	16
17. OTHER RECEIPTS (Dividends, Interest, etc.)	0	0	17
18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)	3555.00	0	18
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES	1724.18	0	19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES	0	0	20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	0	0	21
22. INDEPENDENT EXPENDITURES (use Schedule E)	0	0	22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. § 441 a(d)) (Use Schedule F)	0	0	23
24. LOAN REPAYMENTS MADE	0	0	24
25. LOANS MADE	0	0	25
26. REFUNDS OF CONTRIBUTIONS TO			
(a) Individuals/Persons Other Than Political Committees	0	0	26(a)
(b) Political Party Committees	0	0	26(b)
(c) Other Political Committees	0	0	26(c)
(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))	0	0	26(d)
27. OTHER DISBURSEMENTS	0	0	27
28. TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	1724.18	0	28
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)	3555.00	0	29
30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)	0	0	30
31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)	3555.00	0	31
32. TOTAL OPERATING EXPENDITURES from Line 19	1724.18	0	32

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SCHEDULE A — ITEMIZED RECEIPTS

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

Name of Committee (In Full)
12th Congressional District Mondale Delegates

A. Full Name, Mailing Address and ZIP Code 12th Congressional District Mondale Delegate Com. Address information To follow Receipt For: X Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year) 3.26.84	Amount of Each Receipt this Period $1,200
B. Full Name, Mailing Address and ZIP Code Carpenters Local #275 12C Treasurer - John Crawford 5202 Palmer's Mill Rd. Clifton Heights, Pa. 19018 Receipt For: X Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year) 3.29.84	Amount of Each Receipt This Period $500.00
C. Full Name, Mailing Address and ZIP Code Mondale Delegates at Large 1418 Walnut St. Phila. Pa. Receipt For: X Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year) 4.2.84	Amount of Each Receipt This Period $1,000.00
D. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
E. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
F. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
G. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
SUBTOTAL of Receipts This Page (optional)			
TOTAL This Period (last page this line number only)			$2,700

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SCHEDULE B — ITEMIZED DISBURSEMENTS

Page 1 of 1

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)
7th Congressional Dist'l Fiendale Delegates

A. Full Name, Mailing Address and ZIP Code Kennedy Printing Co. 5534 Baltimore Ave. Phila., Pa. 19143	Purpose of Disbursement Sample Ballots Disbursement for: ☐Primary ☐General ☐ Other (specify):	Date (month, day, year) 3-29-84	Amount of Each Disbursement This Period $557.68
B. Full Name, Mailing Address and ZIP Code Kennedy Printing Co. 5534 Baltimore Ave. Phila., Pa. 19143	Purpose of Disbursement Final Badges Disbursement for: ☐Primary ☐General ☐ Other (specify):	Date (month, day, year) 4-1-84	Amount of Each Disbursement This Period $265.00
C. Full Name, Mailing Address and ZIP Code CFR Leasing Corp Address information to follow	Purpose of Disbursement Rental Car for Workers Disbursement for: ☐Primary ☐General ☐ Other (specify):	Date (month, day, year) 3-28-84	Amount of Each Disbursement This Period 200.00
D. Full Name, Mailing Address and ZIP Code John Greiscing Address information to follow	Purpose of Disbursement 1 week per diem pay Disbursement for: ☐Primary ☐General ☐ Other (specify):	Date (month, day, year) 3-24-84	Amount of Each Disbursement This Period $234.50
E. Full Name, Mailing Address and ZIP Code Andrean Moss Address information to follow	Purpose of Disbursement 2 week per diem pay Disbursement for: ☐Primary ☐General ☐ Other (specify):	Date (month, day, year) 3-24-84	Amount of Each Disbursement This Period $231.00
F. Full Name, Mailing Address and ZIP Code Mike Veite Address information to follow	Purpose of Disbursement 2 week per diem pay Disbursement for: ☐Primary ☐General ☐ Other (specify):	Date (month, day, year) 3-24-84	Amount of Each Disbursement This Period $231.00
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐Primary ☐General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐Primary ☐General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐Primary ☐General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			$1724.18

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Page 1 of 1
LINE NUMBER 28
(Use separate schedule(s) for each category of the Detailed Summary Page)

SCHEDULE B — ITEMIZED DISBURSEMENTS

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)
7th Congressional Dist'l Bicentennial Delegates

	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Full Name, Mailing Address and ZIP Code Kennedy Printing Co. 5534 Baltimore Ave. Phila., Pa. 19143	Sample Ballots Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	3.29.84	$ 559.68
B. Full Name, Mailing Address and ZIP Code Kennedy Printing Co. 5534 Baltimore Ave. Phila., Pa. 19143	Final Badges Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4.1.84	$ 265.00
C. Full Name, Mailing Address and ZIP Code CFR Leasing Corp Address information to follow	Rental Car for Walkers Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	3.28.84	200.00
D. Full Name, Mailing Address and ZIP Code John Greissing Address information to follow	1 week per diem pay Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	3.24.84	$ 234.50
E. Full Name, Mailing Address and ZIP Code Andrean Moss Address information to follow	2 week per diem pay Disbursement for: ☒ Primary ☐ General ☐ Other (specify)	3.24.84	$ 231.00
F. Full Name, Mailing Address and ZIP Code Mike Veite Address information to follow	2 week per diem pay Disbursement for: ☒ Primary ☐ General ☐ Other (specify)	3.24.84	$ 231.00
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			$ 1724.18

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EXHIBIT "B"

THE PROVIDENT

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CHECKING STATEMENT

STATEMENT DATE MAY 01, 1984

SEVENTH CONGRESSIONAL
MONDALE DELEGATES
90 BARBARA RD
DREXEL HL PA 19026

PAGE	BRANCH REFERENCE
1	1 09-000-M 10

CHECKING ACCOUNT 301-114-3

DATE	AMOUNT	TRANSACTION DESCRIPTION		BALANCE
		PREVIOUS BALANCE	04-02-84	1,483.50
4/03	325.00+	DEPOSIT	43777657	1,808.50
4/05	950.00	CHECK	11534494	858.50
4/06	200.00+	DEPOSIT	44585607	1,058.50
4/09	320.00+	DEPOSIT	11993627	1,378.50
	43.00	CHECK	64548661	1,335.50
	100.00	CHECK	64643760	1,235.50
	420.00	CHECK	64546453	815.50
	750.00	CHECK	64643761	65.50
4/10	25.00+	DEPOSIT	12514858	90.50
	400.00+	DEPOSIT	45532108	490.50
4/13	100.00+	DEPOSIT	46366091	590.50
	400.00+	DEPOSIT	46326886	990.50
	70.00	CHECK	65171202	920.50
4/16	330.00	CHECK	65375689	590.50
4/17	500.00	CHECK	46829631	90.50
4/24	20.00	CHECK	66933985	70.50
4/26	50.00	CHECK	78989381	20.50
4/30	25.00+	DEPOSIT	15722616	45.50

TOTAL CHECKS AND OTHER CHARGES	TOTAL DEPOSITS AND OTHER CREDITS	ENDING BALANCE
3,233.00	1,795.00	45.50

THE PROVIDENT

CHECKING STATEMENT

STATEMENT DATE APR 02, 1984

CONGRESSIONAL
MONDALE DELEGATES
90 BARBARA RD
DREXEL HL PA 19026

PAGE	BRANCH REFERENCE
1	1 09-000-M 2

CHECKING ACCOUNT 301-114-3

DATE	AMOUNT	TRANSACTION DESCRIPTION		BALANCE
		PREVIOUS BALANCE	03-16-84	.00
3/16	25.00+	DEPOSIT	15941844	25.00
3/26	1,200.00+	MONEY TRANSFER IN 15:04 REF:001190	03-26-84	1,225.00
3/28	25.00+	DEPOSIT	42948231	1,250.00
	696.50	CHECK	42949184	553.50
3/29	200.00	CHECK	10077723	353.50
3/30	30.00+	DEPOSIT	43397389	383.50
	1,100.00+	DEPOSIT	10267741	1,483.50

TOTAL CHECKS AND OTHER CHARGES	TOTAL DEPOSITS AND OTHER CREDITS	ENDING BALANCE
896.50	2,380.00	1,483.50

EXHIBIT "B"

KI, ESQUIRE
e Street

ANIA 19063

8504050775



STEPHEN MIMS, ESQUIRE
GENERAL COUNSEL'S OFFICE
FEDERAL ELECTION COMMISSION
1325 K STREET, NW
WASHINGTON, D.C. 20463

APR 27 A9:20

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84 JUN 14 P1:08

GCC # 2618

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1704

NAME OF COUNSEL: James M. Beck

ADDRESS: Pepper Hamilton and Scheetz
2001 Fidelity Bldg.
123 S. Broad St.
Phila., Pa. 19109

TELEPHONE: 215.893.3995

84 JUN 14 P1:47

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.

June 10, 1984 — Date

Nancy B. Baulis — Signature

RESPONDENT'S NAME: Nancy B. Baulis

ADDRESS: 90 Barbara Rd.
Drexel Hill Pa.
19026

HOME PHONE: 215.623.6128

BUSINESS PHONE: None

8504050077

GCC# 3618

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1704

NAME OF COUNSEL: Janice M. Sawicki

ADDRESS: 117 North Monroe St.
P.O. Box 87
Media, Pa. 19063

TELEPHONE: 215.565.4463

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.

June 10, 1984
Date

Nancy B. Baulis
Signature

RESPONDENT'S NAME: Nancy B. Baulis

ADDRESS: 90 Barbara Rd.
Drexel Hill, Pa.
19026

HOME PHONE: 215.623.6128

BUSINESS PHONE: None

8504050078

Bonnie
Barbara Rd.
Drexel Hill, Pa.
19026



CERTIFIED
P 501 854 795
MAIL

Federal Election Com.
1325 K. St., N.W.
Washington, D.C. 20463

RECEIVED AT THE FEC
GCC# 3404
84 MAY 1 AM : 03

JANICE M. SAWICKI
ATTORNEY AT LAW
117 NORTH MONROE STREET
P.O. BOX 87
MEDIA, PENNSYLVANIA 19063
AREA CODE 215
565-4463

May 29, 1984

MUR 1667
Mem 2:55

Stephen Mims
General Counsel's Office
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: Americans with Hart, Inc. v. Mondale
for President Committee, Inc., MUR 1667

Dear Mr. Mims:

This letter serves as the response of the 7th Congressional District Mondale Delegates (" the Committee") to the general allegations contained in the amended complaint filed with the Federal Election Commission ("FEC") by complainant Americans with Hart, Inc. ("Hart") against respondent Mondale for President Committee, Inc. ("MPC" or "Mondale campaign"). The Committee knows nothing first-hand about the activities of MPC, Mondale delegate committees in other states, or other Mondale district delegate committees in Pennsylvania. As a result, this submission will respond only to those charges alleging that certain of the Committee's actions were either illegal or created an affiliation between the Committee and MPC.

Before addressing these allegations, it is necessary to describe the political and legal backdrop against which the Committee operated. The 1984 procedure for delegate selection in Pennsylvania differed sharply from procedures used in previous elections. In 1980, delegates were apportioned more or less in accordance with the popular vote received by the candidates in each congressional district. The 1984 procedure, however, called for the direct election of delegates. There is therefore no necessary correlation between the success of presidential candidate Walter Mondale and the success of Mondale delegates. A Mondale delegate who relied solely on the appeal of Walter Mondale, then, would not be assured of election. Under this new dual system, many of the delegate candidates certainly would have organized something in the nature of delegate committees without any encouragement from the Mondale campaign.

In considering the Hart allegations regarding the Committee, the nature of the delegate selection procedures serves as a necessary reference point.

I. Formation

The Committee was created on March 16, 1984. See Organization Statement,

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attached as Exhibit "A". Mondale delegate candidates in the Seventh District had been informed that, because of the new Pennsylvania delegate selection procedures, the Mondale campaign would not be devoting any resources to assist the election of individual delegates. All grass roots activities, such as leafletting, the printing and distribution of election literature, rallies, and the like, were to be done, if at all, by the delegation themselves. The delegate candidates had previously received, as a matter of course, material from the Mondale campaign regarding the legal requirements for forming a delegate committee. The allegation that the Committee was being "used" by the Mondale campaign to "take over entire sections" of the campaign, Hart April 18 Submission at 2, 3, has no validity. MPC did not "use" the Committee, on the contrary, the Mondale campaign never assumed any responsibility for these activities. Argument implicitly affirms that the Committee conducted precisely those activities allowed by the FEC's regulations. See 11 C.F.R. section 110.13 (d) (2) (i).

II. Staffing; Activities

Because direct election of delegates was new to Pennsylvania; because the Committee had few resources to actively recruit volunteers; and because it was necessary to obtain staff as quickly as possible in view of the April 10th primary, the Committee utilized the services of three experienced Mondale workers from late March until the primary. The nature of the previous affiliation between these volunteers and the Mondale campaign is not known. In addition, MPC had no power whatsoever over the members of the Committee. See 11 C.F.R. section 100.5 (g) (2) (ii). Neither Ms. Nancy Baulis, the treasurer, nor any of the delegate candidates have had any connections to Mondale's campaign.

The Committee designed its own literature and buttons. It did no public advertising of its own, nor did it share any space or time with MPC on any of the latter's advertisements. The mere prior work history of person's on the Committee's staff does not implicate any of the five affiliating factors set out in the federal regulations. See 11 C.F.R. section 100.5 (g) (2).

III. Contributions to MDCR

The Committee raised more than $ 4,000.00. See Checking Account Statements, attached as Exhibit "B". Some $ 2,200.00 of these funds came from two other Mondale delegate committees in Pennsylvania: a $ 1,000.00 contribution from the Pennsylvania At-Large Delegate Committee and a $ 1,200.00 contribution from another district committee. See Report of Receipts and Expenditures, attached as Exhibit "C". The Committee has recently been informed that the $ 1,200.00 contribution should be considered a loan.

The $ 1,000.00 PALC contribution suggests nothing about the relationship between the Committee and the Mondale campaign. The contribution is not only legal, but also makes perfect sense in light of the manner in which at-large delegates are selected in Pennsylvania. At-large delegates are apportioned on the basis of pledged delegates elected at the district level. They themselves are not on the ballot. PALC contributed the $ 1,000.00 to the Committee in order to help itself by aiding the election of the Seventh District delegates. The Mondale campaign had nothing to do with this contribution. Hart has alleged

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7th Congressional District Mondale Delegates

3.16.84

(a) Address Number and Street: 90 Barbara Rd.

2. FEC Identification Number:

(c) City, State and ZIP Code: Drexel Hill, Pa. 19026

4. Is this an amended Statement? ☐ YES ☒ NO

5. TYPE OF COMMITTEE (check one):

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

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

Name of Candidate	Candidate Party Affiliation	Office Sought	State/District

☒ (c) This committee supports/opposes only one candidate Walter F. Mondale (name of candidate) and is NOT an authorized committee.

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

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

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

6. Name of Any Connected Organization or Affiliated Committee	Mailing Address and ZIP Code	Relationship
None		

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

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

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

Full Name	Mailing Address and ZIP Code	Title or Position
[illegible]		

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

Full Name	Mailing Address and ZIP Code	Title or Position
Nancy B. Baulis	90 Barbara Rd. Drexel Hill, Pa. 19026	Treasurer

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

Name of Bank, Depository, etc.	Mailing Address and ZIP Code
Provident National Bank	Hart Lane + Saxer Av Springfield, Pa. 19064

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

Nancy B. Baulis — Nancy B. Baulis — 3.23.84

Type or Print Name of Treasurer — SIGNATURE OF TREASURER — Date

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

For further information contact: Federal Election Commission, Toll Free 800-424-9530, Local 202-523-4068

FEC FORM 1 (3/80)

EXHIBIT "A"

8504050078?

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

ACKNOWLEDGEMENT OF RECEIPT OF STATEMENT OF ORGANIZATION

Filed pursuant to the Federal Election Campaign Act of 1971, as amended

NANCY B. BAULIS, TREAS.
7TH CONGRESSIONAL DISTRICT MONDALE DELEGATES
90 BARBARA RD.
DREXEL HILL, PENNSYLVANIA 19026

DATE: 03/28/84

NOTICE REGARDING FILINGS UNDER THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED

Your assigned FEC IDENTIFICATION NUMBER is C00180398

In the future this number should be entered on all subsequent reports filed under the Act, as well as on all communications concerning such reports and statements. This acknowledgement will be the only receipt provided directly by the Commission, for documents filed. The Commission recommends that all future filings be mailed Certified or Registered, Return Receipt Requested, in order to insure timeliness of your filings and to provide additional receipts for your records.

FEDERAL ELECTION COMMISSION

FEC FORM 20 (10/12/76)
(Supersedes FEC Forms 13, 14, and 15)

8504050078 3

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

(Summary Page)

ALIGN AREA | | ALIGN AREA

1. Name of Committee (In Full)
7th Congressional District Mondale Delegates

Address (Number and Street)
4 Barbara Rd.

City, State and ZIP Code
Drexel Hill, Pa. 19026

☐ Check here if address is different than previously reported

2. FEC Identification Number
C 00 181 392

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

4. TYPE OF REPORT (Check appropriate boxes)

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

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

SUMMARY

5. Covering Period 3·16·84 through 4·10·84

	COLUMN A This Period	COLUMN B Calendar Year to Date
6. (a) Cash on hand January 1, 19 84		$ 0
(b) Cash on Hand at Beginning of Reporting Period	$ 0	
(c) Total Receipts (from Line 18)	$ 3,555.00	$ 0
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ 3,555.00	$ 0
7. Total Disbursements (from Line 28)	$ 1721.18	$ 0
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 1833.82	$ 0
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)	$ 0	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	$ 0	

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

Nancy B. Baulis
Type or Print Name of Treasurer

Nancy B. Baulis 4·10·84
SIGNATURE OF TREASURER Date

For further information contact:
Federal Election Commission
Toll Free 800 424 9530
Local 202 523 4068

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

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

FEC FORM 3X (3/80)

EXHIBIT "C"

85040507001

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

Name of Committee (in Full): 7th Congressional [illegible]

Report Covering the Period: From 3.1.84 to 4.10.84

	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date	
I. RECEIPTS			
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees	855.00	0	11(a)
(Memo Entry Unitemized $ 855.00)			
(b) Political Party Committees	0	0	11(b)
(c) Other Political Committees	2,700.00	0	11(c)
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c))	3,555.00	0	11(d)
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES	0	0	12
13. ALL LOANS RECEIVED	0	0	13
14. LOAN REPAYMENTS RECEIVED	0	0	14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	0	0	15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	0	0	16
17. OTHER RECEIPTS (Dividends, Interest, etc.)	0	0	17
18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)	3555.00	0	18
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES	1724.18	0	19
20. TRANSFERS TO AFFILIATED OTHER PARTY COMMITTEES	0	0	20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	0	0	21
22. INDEPENDENT EXPENDITURES (use Schedule E)	0	0	22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. § 441 a(d)) (Use Schedule F)	0	0	23
24. LOAN REPAYMENTS MADE	0	0	24
25. LOANS MADE	0	0	25
26. REFUNDS OF CONTRIBUTIONS TO			
(a) Individuals/Persons Other Than Political Committees	0	0	26(a)
(b) Political Party Committees	0	0	26(b)
(c) Other Political Committees	0	0	26(c)
(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))	0	0	26(d)
27. OTHER DISBURSEMENTS	0	0	27
28. TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	1724.18	0	28
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)	3555.00	0	29
30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)	0	0	30
31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)	3555.00	0	31
32. TOTAL OPERATING EXPENDITURES from Line 19	1724.18	0	32
[illegible]			33

8500708

Page 1 of 1
LINE NUMBER 11B
Use separate schedule(s) for each category of the Detailed Summary Page

SCHEDULE A **ITEMIZED RECEIPTS**

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

Name of Committee (in Full)
7th Congressional District Mondale Delegates

A. Full Name, Mailing Address and ZIP Code 12th Congressional District Mondale Delegate Com. Address information To follow Receipt For: X Primary ☐ General ☐ Other (specify)	Name of Employer Occupation Aggregate Year-to-Date $	Date (month, day, year) 3.26.84	Amount of Each Receipt this Period $1,200
B. Full Name, Mailing Address and ZIP Code Carpenters Local #175 Ide Treasurer - John Crawford 5262 Palmer's Mill Rd. Clifton Heights, Pa. 19018 Receipt For: X Primary ☐ General ☐ Other (specify)	Name of Employer Occupation Aggregate Year-to-Date $	Date (month, day, year) 3.29.84	Amount of Each Receipt This Period $500.00
C. Full Name, Mailing Address and ZIP Code Mondale Delegates at Large 1418 Walnut St. Phila. Pa. Receipt For: X Primary ☐ General ☐ Other (specify)	Name of Employer Occupation Aggregate Year-to-Date $	Date (month, day, year) 4.2.84	Amount of Each Receipt This Period $1,000.00
D. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Name of Employer Occupation Aggregate Year-to-Date $	Date (month, day, year)	Amount of Each Receipt This Period
E. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Name of Employer Occupation Aggregate Year-to-Date $	Date (month, day, year)	Amount of Each Receipt This Period
F. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Name of Employer Occupation Aggregate Year-to-Date $	Date (month, day, year)	Amount of Each Receipt This Period
G. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Name of Employer Occupation Aggregate Year-to-Date $	Date (month, day, year)	Amount of Each Receipt This Period
SUBTOTAL of Receipts This Page (optional)			
TOTAL This Period (last page this line number only)			$2,700

85040500785

Page 2 of 2 for
LINE NUMBER 28
(Use separate schedule(s) for each category of the Detailed Summary Page)

SCHEDULE B **ITEMIZED DISBURSEMENTS**

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)
7th Congressional District Democratic Delegates

	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Full Name, Mailing Address and ZIP Code Kennedy Printing Co. 5534 Baltimore Ave. Phila., Pa. 19143	Sample Ballots Disbursement for ☒ Primary ☐ General ☐ Other (specify)	3.29.84	$ 559.68
B. Full Name, Mailing Address and ZIP Code Kennedy Printing Co. 5534 Baltimore Ave. Phila., Pa. 19143	Final Badges Disbursement for ☒ Primary ☐ General ☐ Other (specify)	4.1.84	$ 265.00
C. Full Name, Mailing Address and ZIP Code CFR Leasing Corp Address information to follow	Rental Car for Workers Disbursement for ☒ Primary ☐ General ☐ Other (specify)	3.28.84	200.00
D. Full Name, Mailing Address and ZIP Code John Greiscing Address information to follow	Work per diem pay Disbursement for ☒ Primary ☐ General ☐ Other (specify)	3.24.84	$ 234.50
E. Full Name, Mailing Address and ZIP Code Andrean Moss Address information to follow	2 week per diem pay Disbursement for ☒ Primary ☐ General ☐ Other (specify)	3.24.84	$ 231.00
F. Full Name, Mailing Address and ZIP Code Mike Veito Address information to follow	2 week per diem pay Disbursement for ☒ Primary ☐ General ☐ Other (specify)	3.24.84	$ 231.00
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			$ 1731.18

85040500787

THE PROVIDENT
PROVIDENT NATIONAL BANK

CHECKING STATEMENT
STATEMENT DATE MAY 01, 1984

SEVENTH CONGRESSIONAL
MONDALE DELEGATES
90 BARBARA RD
DREXEL HL PA 19026

PAGE	BRANCH REFERENCE
1	1 09-000-N 10

CHECKING ACCOUNT 301-114-3

DATE	AMOUNT	TRANSACTION DESCRIPTION		BALANCE
		PREVIOUS BALANCE	04-02-84	1,483.50
4/03	325.00+	DEPOSIT	43777657	1,808.50
4/05	950.00	CHECK	11534494	858.50
4/06	200.00+	DEPOSIT	44585607	1,058.50
4/09	320.00+	DEPOSIT	11993627	1,378.50
	43.00	CHECK	64548661	1,335.50
	100.00	CHECK	64643760	1,235.50
	420.00	CHECK	64546453	815.50
	750.00	CHECK	64643761	65.50
4/10	25.00+	DEPOSIT	12514858	90.50
	400.00+	DEPOSIT	45532100	490.50
4/13	100.00+	DEPOSIT	46366091	590.50
	400.00+	DEPOSIT	46326006	990.50
	70.00	CHECK	65171202	920.50
4/16	330.00	CHECK	65375889	590.50
4/17	500.00	CHECK	46829631	90.50
4/24	20.00	CHECK	66933905	70.50
4/26	50.00	CHECK	78909301	20.50
4/30	25.00+	DEPOSIT	15752616	45.50

TOTAL CHECKS AND OTHER CHARGES	TOTAL DEPOSITS AND OTHER CREDITS	ENDING BALANCE
3,233.00	1,795.00	45.50

8504050078 3

JANICE M. SAWICKI
ATTORNEY AT LAW
117 NORTH MONROE STREET
P.O. BOX 87
MEDIA, PENNSYLVANIA 19063

RETURN RECEIPT REQUESTED

R 198 061 830

Stephen Mims
General Counsel's Office
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

03

CE M. SAWICKI
TORNEY AT LAW
TH MONROE STREET
P. O. BOX 87
PENNSYLVANIA 19063

RETURN RECEIPT REQUESTED

R 198 061 830

Stephen Mims
General Counsel's Office
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

MAY 1 03

RECEIVED AT THE FEC
Cat # 3580
84 MAY 28 P1:42

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1667

NAME OF COUNSEL: Janice M. Sawicki

ADDRESS: 117 N. Monroe St.
P.O. Box 87
Media, Pa. 19063

TELEPHONE: 215-565-4463

MUR 1667 84 MAY 29 A4:39

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.

84 JUN 4 A4:37

5.18.84
Date

Nancy B. Baulis
Signature

RESPONDENT'S NAME: Nancy B. Baulis

ADDRESS: 90 Barbara Rd.
Drexel Hill, Pa.
19026

HOME PHONE: 215-MA3-6128

BUSINESS PHONE: None

8504050079 1

8504050079 2

RECEIVED FEC

84 MAY 29 P 1:12

RETURN RECEIPT REQUESTED

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

REGISTERED MAIL

R 025 717 886

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Nancy B. Baulis, Treasurer
7th Congressional District
Mondale Delegates
90 Barbara Road
Drexel Hill, PA 19026

Re: MUR 1667

Dear Ms. Baulis:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

8504005079 3

If you have any questions, please contact Stephen Nims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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

8504050079 4

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Nancy B. Baulis, Treasurer
7th Congressional District
Mondale Delegates
90 Barbara Road
Drexel Hill, PA 19026

Re: MUR 1667

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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.

8504050079

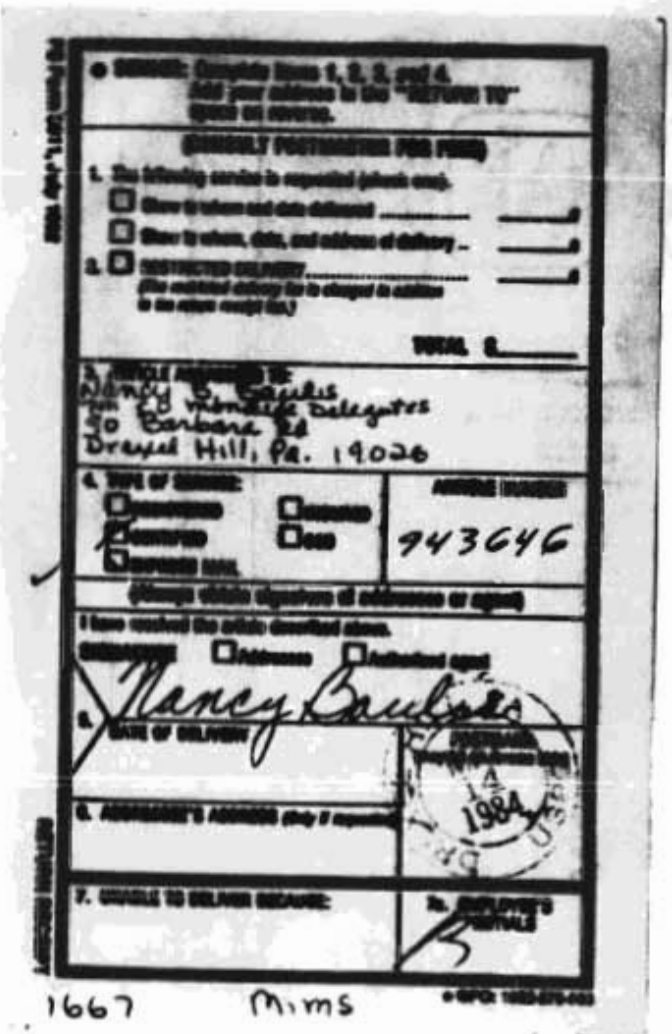
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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



8504050076 96

RECEIVED BY THE FEC
GCC#3405
84 MAY 1 AM : 03

PEPPER, HAMILTON & SCHEETZ

ATTORNEYS AT LAW

1777 F STREET, N.W.
WASHINGTON, D.C. 20006
202-842-8100

10 SOUTH MARKET SQUARE
HARRISBURG, PA 17108
717-255-1155

100 RENAISSANCE CENTER
DETROIT, MI 48243
313-259-7110

30TH FLOOR
THE FIDELITY BUILDING
123 SOUTH BROAD STREET
PHILADELPHIA, PENNSYLVANIA 19109-1099
215-981-4000
CABLE ADDRESS "PEPHIL PHILADELPHIA"
TELECOPIER (#465) 215-732-6955 • (#3800) 215-568-8584
DEX (#3800) 215-848-3477 • TWX 710-670-0777

606 SOUTH OLIVE STREET
LOS ANGELES, CA 90014
213-617-0151

540 HAMILTON STREET
ALLENTOWN, PA 18101
215-434-0104

SIX CORPORATE PARK DRIVE
WHITE PLAINS, NY 10604
914-694-4600

WRITER'S DIRECT DIAL NUMBER
(215) 893-3995

May 30, 1984

8504050727

BY REGISTERED MAIL

Stephen Mims
General Counsel's Office
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

2 A2:50

Re: Americans with Hart, Inc. v. Mondale for President Committee, Inc., MUR 1667

Dear Mr. Mims:

Enclosed please find the designation of counsel form and response of the 5th Congressional District Mondale Delegates Committee.

Yours truly,

James M. Beck

JMB/ms

Enclosures

PEPPER, HAMILTON & SCHEETZ
ATTORNEYS AT LAW

1777 F STREET, N.W.
WASHINGTON, D.C. 20006
202-842-0100

10 SOUTH MARKET SQUARE
HARRISBURG, PA 17108
717-255-1155

100 RENAISSANCE CENTER
DETROIT, MI 48243
313-259-7110

80TH FLOOR
THE FIDELITY BUILDING
123 SOUTH BROAD STREET
PHILADELPHIA, PENNSYLVANIA 19109-1099
215-563-3000
CABLE ADDRESS "PEPHIL PHILADELPHIA"
TELECOPIER (GROUP 3) 215-732-6999 • (GROUP 2) 215-568-8864
TELEX (WUI) 215-546-3477 • TWX 710-670-0777

606 SOUTH OLIVE STREET
LOS ANGELES, CA 90014
213-617-5151

510 HAMILTON STREET
ALLENTOWN, PA 18101
215-434-0104

216 CORPORATE PARK DRIVE
WHITE PLAINS, NY 10604
914-694-4500

WRITER'S DIRECT DIAL NUMBER
(215) 893-3995

May 30, 1984

Stephen Mims, Esquire
General Counsel's Office
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: Americans with Hart, Inc. v. Mondale
for President Committee, Inc. MUR 1667

Dear Mr. Mims:

This letter is the response of the 5th Congressional District Delegates for Mondale Committee ("5th District Committee" or "Committee") to allegations contained in the amended complaint filed with the Federal Election Commission ("FEC") by complainant Americans with Hart, Inc. ("Hart") against respondent Mondale for President Committee, Inc. ("MPC" or "Mondale campaign"). Because the 5th District Committee has no knowledge whatsoever regarding the activities of MPC or any other delegate committee within or without Pennsylvania, this letter concerns only to those allegations that certain actions by the 5th District Committee were either illegal or created an affilation between the 5th District Committee and MPC.

8504050079 3

When considering Hart's allegations, it is important to keep in mind that the direct election of delegates in the April 10th Pennsylvania primary was a departure from prior practice. No connection existed between the success of Walter Mondale and the success of Mondale delegates. Presumably, then, many of the delegate candidates would have set up something akin to delegate committees without any encouragement from the Mondale campaign.

8504050079?

I. Staffing

The Committee consisted of the delegate candidates pledged to Walter Mondale who were running in the 5th Congressional District. The treasurer was Kathy Neary. The Committee was staffed entirely with local volunteers, none of whom had them previously worked elsewhere for the Mondale campaign. There were no payments of any sort to any staff members. No one on the Committee did anything upon orders from MPC or any other committee.

II. Contributions to the Committee

The 5th District Committee had a total of $1,470 in receipts. See Statement of Expenses, attached as Exhibit "A". Of the contributions to the Committee, $900 came from labor union PACs in disregard of the wishes of MPC. Labor PAC's were solicited on behalf of the Committee by the local office of the AFL-CIO. The remainder of the 5th District Committee's funds came from contributions generated by the candidates themselves. The 5th District Committee received no money from MPC, the Pennsylvania At-Large Delegates Committee ("PALC"), or any other policital committee.

III. Disbursements by the Committee

The Committee spent its money on a few grassroots activities, particularly the printing of literature to be distributed by volunteers. The Committee also made small contributions to local party organizations to reimburse them for election day printing expenses. No "advertising" of any sort took place. The 5th District Committee made no contributions to the Mondale national campaign, to PALC, or to any any other delegate committee.

8504050800

IV. Conclusion

For the reasons set forth in this response, the Commission should find no reason to believe that the 5th District Committee has violated the Federal Election Campaign Act.

Respectfully submitted,

PETER HEARN
JAMES M. BECK
Pepper, Hamilton & Scheetz
2001 The Fidelity Building
123 South Broad Street
Philadelphia, PA 19103
(215) 893-3000

Attorneys for KATHLEEN NEARY, TREASURER, 5TH DISTRICT DELEGATES FOR MONDALE COMMITTEE

8504050080 1

STATEMENT OF EXPENSES

Contributions - Personal

Kathy Neary	$ 50.00
Robert Methvin	100.00
Edgar Howard	100.00
Bernard Bowman	100.00
John Newburg	100.00
Edward Kirshner	100.00
Keith Paul Hartman	10.00
Patricia Putman	10.00

Contributions - PACs

UAW, Detroit, Michigan	500.00
IBEW, Washington, DC	200.00
Steamfitter's Local #420, Philadelphia, PA	200.00

Expenses

Committee to Elect Sheridan Jones Chester, PA	50.00
Montgomery County Democratic Committee	100.00
Kennedy Printing Philadelphia, PA	474.52

8504050080C

EXHIBIT "A"

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1667

NAME OF COUNSEL: James M. Beck

ADDRESS: 123 S. Broad St.
Phila., Pa. 19109

TELEPHONE:

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.

5/24/84
Date

Kathleen Neary
Signature

RESPONDENT'S NAME: Kathleen Neary

ADDRESS: 22 W. Laughead Ave
Boothwyn, Pa. 19061

HOME PHONE: 215-485-3799

BUSINESS PHONE: 215-485-7351

8504005008 0

RECEIVED AT FEC
PHILADELPHIA
84 MAY 1 AM 9
PA

PEPPER, HAMILTON & SCHEETZ
ATTORNEYS AT LAW
2001 FIDELITY BUILDING
123 SOUTH BROAD STREET
PHILADELPHIA, PA. 19109

To

Stephem Mims
General Counsel's Office
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

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PEPPER, HAMILTON & SCHEETZ

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WASHINGTON, D.C. 20006
202-842-8100

10 SOUTH MARKET SQUARE
HARRISBURG, PA 17108
717-255-1155

100 RENAISSANCE CENTER
DETROIT, MI 48243
313-259-7110

20TH FLOOR
THE FIDELITY BUILDING
123 SOUTH BROAD STREET
PHILADELPHIA, PENNSYLVANIA 19109
215-563-2000

CABLE ADDRESS "PEPHIL PHILADELPHIA"
TELECOPIER (G-II) 215-735-0000 • (G-III) 215-568-7864
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606 SOUTH OLIVE STREET
LOS ANGELES, CA 90014
213-617-0151

518 HAMILTON STREET
ALLENTOWN, PA 18101
215-434-0104

SIX CORPORATE PARK DRIVE
WHITE PLAINS, NY 10604
914-694-6800

May 29, 1984

MUR 1667
Mims

Stephen Mims
General Counsel's Office
Federal Election Commission
1325 K Street, N.W.
Washington, DC 20463

Re: Americans with Hart, Inc. v. Mondale
for President Committee, Inc., MUR 1667

Dear Mr. Mims:

On May 15, 1984, the Fourth District Delegates for Mondale of Pennsylvania ("Fourth District Committee") received notice from the Federal Election Commission of an amended complaint filed by Americans with Hart, Inc. ("Hart") against the Mondale for President Committee ("MPC"). Allegations in that complaint refer to certain activities of the Pennsylvania delegate committees. This letter and supporting exhibits constitute the Fourth District Committee's response to those allegations.

Preliminarily, and because the Hart complaint seems to misperceive how the Pennsylvania primary system operates, a brief elucidation of that system is needed. Pennsylvania now requires that all party delegates be selected by direct election. This is

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new to Pennsylvania and unlike the state's past system whereby delegate selection was based on the proportion of votes received by the presidential candidates in each congressional district. The Fourth District Committee was founded upon the realities of this dual primary system -- not upon the dictates of MPC.

The Fourth District Committee did receive some literature from MPC in the early stages of its organization. However, this was purely informational material outlining the legal requirements of committee formation and expenditures under federal election law. At no time did the Fourth District Committee receive any directives or orders from the MPC; nor did it receive any financial aid from the national committee.

The Fourth District Committee was organized on March 19, 1984. See Exhibit "A". It consisted of 5 delegates and 2 alternate candidates for the Democratic National Convention. Two Reports of Receipts and Disbursements were filed with the Federal Election Commission, the first for the period March 19 through 29, and the second for March 30 through May 9, 1984.[1] See Exhibits "B" and "C". The information contained in these reports

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1. The first report was filed on an FEC form for an "Authorized Committee." This was an inadvertent oversight and was subsequently corrected by the filing of the second, proper form.

is accurate and complete. Following is a more detailed description of salient entries in the filed reports.

I. Contributions

The Fourth District Committee received the bulk of its funds from three political action committees ("PAC's"). Each donation was within the limit set by 11 C.F.R. §110.2(a)(1). The money was devoted to the successful election of Fourth District delegates. Although aware that MPC would have preferred that local delegate committees not accept PAC money, the Fourth District Committee chose to ignore MPC wishes so that it could conduct its own independent campaign as effectively as possible. This fact by itself contravenes Harts allegations of affiliation between the local committees and the MPC.

As to charges that delegate committees received funds from other delegate committees (See Hart April 27 Submission at 5), the Fourth District Committee received no such funds. Aside from PAC money, all other contributions were small donations made by candidates themselves. See Exhibits "B" and "C".

II. Disbursements

A. Staffing, Volunteers

The Fourth District Committee had no permanent full-time staff, but instead relied on volunteer services. It did distrib-

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ute per diem expenses (labeled "services rendered" on the FEC reports, Exhibits "B" and "C") to a number of volunteers. For example, on April 9, the day before the primary, the Committee distributed over 40 such payments of $20 to $25 to cover the expenses of local volunteers who engaged in vote-getting activities throughout the district. Additional sums were disbursed to the Aliquippa, Conway and Ambridge Democratic Committees which in turn made small per diem payments to their volunteers.[2]

The Fourth District Committee did have the assistance, for approximately two weeks, of two out-of-state volunteers. Although both had previously worked for Mondale, it is not known whether they were on the MPC staff. Their services for the Fourth District were performed solely in cooperation with, and at the request of, Fourth District Committee headquarters. They were reimbursed only for per diem travel and subsistence expenses.

B. Media Disbursements

The Fourth District Committee placed seven political advertisements in newspapers throughout the Fourth District area. These advertisements were all of the same design,

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2. An April 6 entry of disbursement to "Dick Schontz" was similarly for the purpose of reimbursing per diem expenses of volunteers who worked in the Butler County area under the leadership of Mr. Schontz.

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consisting of the word-for-word text of the Committee's slate cards. See Exhibit "D". The slate cards had been designed by the delegates themselves.

The Committee also placed radio advertisements throughout the district. These ads were written with input from the delegates. Each radio spot addressed the substantive issues of the primary and named each and every Mondale delegate and alternate candidate. Insofar as the Committee is aware, there was no direction from MPC regarding the text or placement of these ads. Hart's allegations of affiliation between the MPC and local committees are, therefore, inapplicable, since the criteria for affiliation found in 11 C.F.R. §100.5(g)(ii) are not met, and since these advertisements are not in-kind contributions as defined by 11 C.F.R. 110.14(d)(2)(ii)(A).

Other expenditures made by the Committee, as the reports show, were expenses typical of a grassroots campaign. See Exhibits "B" and "C".

III. Conclusion

For the reasons set forth in this response, the Commission should find no basis for believing that the Fourth

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District Committee has violated the Federal Election Campaign Act.

Respectfully Submitted,

PETER HEARN
JAMES M. BECK
Pepper, Hamilton and Scheetz
2001 The Fidelity Building
123 South Broad Street
Philadelphia, PA 19109
(215) 893-3000

Attorneys for
PETER O. STEEGE,
CHAIRMAN, FOURTH DISTRICT
DELEGATES FOR MONDALE

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STATEMENT OF ORGANIZATION

(see reverse side for instructions)

1. (a) Name of Committee (in Full) ☐ Check if name or address is changed.
4th District Delegates for Mondale

2. Date
March 19, 1984

(b) Address (Number and Street)
1205 Eighth Avenue, P.O. Box 136

3. FEC Identification Number

(c) City, State and ZIP Code
Beaver Falls, PA 15010

4. Is this an amended Statement? ☐ YES ☒ NO

5. TYPE OF COMMITTEE (check one):

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

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

Name of Candidate	Candidate Party Affiliation	Office Sought	State/District

☒ (c) This committee supports/opposes only one candidate Walter Mondale (name of candidate) and is NOT an authorized committee.

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

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

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

6. Name of Any Connected Organization or Affiliated Committee	Mailing Address and ZIP Code	Relationship
NONE		

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

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

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

Full Name	Mailing Address and ZIP Code	Title or Position
		Treasurer

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

Full Name	Mailing Address and ZIP Code	Title or Position
Elizabeth McCurdy	599 - 8th Street, Apt. 402 Freedom, PA 15042	Treasurer

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

Name of Bank, Depository, etc.	Mailing Address and ZIP Code
Equibank	599 3rd Street, Beaver PA 15009

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

Elizabeth McCurdy — Type or Print Name of Treasurer

Elizabeth McCurdy — SIGNATURE OF TREASURER

March 19, 1984 — Date

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

For further information contact: Federal Election Commission, Toll Free 800-424-9530, Local 202-523-4068

FEC FORM 1 (3/80)

EXHIBIT "A"

(Summary Page)

ALIGN AREA

1. Name of Committee (In Full) ELIZABETH McCURDY FOR 4th DISTRICT DELEGATES FOR MONDALE

2. FEC Identification Number C00179846

Address (Number and Street) 1205-8th AVE, P.O. Box 136

3. Is this Report an Amendment? ☐ YES ☒ NO

City, State and Zip Code BEAVER FALLS, PA. 15010 ☐ Check if address is different than previously reported.

TYPE OF REPORT

- ☐ April 15 Quarterly Report
- ☐ July 15 Quarterly Report
- ☐ October 15 Quarterly Report
- ☐ January 31 Year End Report
- ☐ July 31 Mid Year Report (Non-election Year Only)
- ☒ Twelfth day report preceding PRIMARY (Type of Election) election on APRIL 10th in the State of PA.
- ☐ Thirtieth day report following the General Election on _____ in the State of _____
- ☐ Termination Report

This report contains activity for – ☒ Primary Election ☐ General Election ☐ Special Election ☐ Runoff Election

SUMMARY	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. Covering Period 3-19-84 through 3-27-84		
6. Net Contributions (other than loans)		
(a) Total Contributions (other than loans) (From Line 11 (a))	1399.98	1399.98
(b) Total Contribution Refunds (from Line 20 (d))	0	0
(c) Net Contributions (other than loans) (subtract Line 6 (b) from 6 (a))	1399.98	1399.98
7. Net Operating Expenditures		
(a) Total Operating Expenditures (from Line 17)	1262.80	1262.80
(b) Total Offsets to Operating Expenditures (from Line 14)	0	0
(c) Net Operating Expenditures (Subtract Line 7 (b) from 7 (a))	1262.80	1262.80
8. Cash on Hand at Close of Reporting Period (from Line 27)	137.18	
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)	0	
10. Debts and Obligations Owed BY The Committee (Itemize all on Schedule C or Schedule D)	0	

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

For further information, contact:
Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4068

ELIZABETH McCURDY
Type or Print Name of Treasurer

Elizabeth McCurdy
SIGNATURE OF TREASURER

3-27-84
Date

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

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

FEC FORM 3 (3/80)

EXHIBIT "B"

EXHIBIT "F"

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Name of Committee (In Full) ELINOR [redacted] CHICAGO, ILLINOIS
4th DISTRICT DELEGATES FOR MONDALE

Report Covering the Period: From 3/19/84 To 3/31/84

	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date	
I. RECEIPTS			
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees	1399.98	1399.98	11 (a)
(Memo Entry Unitemized $)			
(b) Political Party Committees			11 (b)
(c) Other Political Committees			11 (c)
(d) The Candidate			11 (d)
(e) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b), 11(c) and 11(d))	1399.98	1399.98	11 (e)
12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES			12
13. LOANS:			
(a) Made or Guaranteed by the Candidate			13 (a)
(b) All Other Loans			13 (b)
(c) TOTAL LOANS (add 13 (a) and 13 (b))			13 (c)
14. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)			14
15. OTHER RECEIPTS (Dividends, Interest, etc.)			15
16. TOTAL RECEIPTS (add 11 (e), 12, 13 (c), 14 and 15)	1399 98	1399 98	16
II. DISBURSEMENTS			
17. OPERATING EXPENDITURES	1262 80	1262 80	17
18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES			18
19. LOAN REPAYMENTS:			
(a) Of Loans Made or Guaranteed by the Candidate			19 (a)
(b) Of All Other Loans			19 (b)
(c) TOTAL LOAN REPAYMENTS (add 19 (a) and 19 (b))			19 (c)
20. REFUNDS OF CONTRIBUTIONS TO:			
(a) Individuals/Persons Other Than Political Committees			20 (a)
(b) Political Party Committees			20 (b)
(c) Other Political Committees			20 (c)
(d) TOTAL CONTRIBUTION REFUNDS (add 20 (a), 20 (b), and 20 (c))			20 (d)
21. OTHER DISBURSEMENTS			21
22. TOTAL DISBURSEMENTS (add 17, 18, 19 (c), 20 (d) and 21)	1262.80	1262.80	22

III. CASH SUMMARY

23. CASH ON HAND AT BEGINNING OF REPORTING PERIOD	$ NONE	23
24. TOTAL RECEIPTS THIS PERIOD (From Line 16)	$ 1399 98	24
25. SUBTOTAL (Add Line 23 and Line 24)	$ 1399 98	25
26. TOTAL DISBURSEMENTS THIS PERIOD (From Line 22)	$ 1262.80	26
27. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (Subtract Line 26 from 25)	$	27

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

Name of Committee (in Full): ELIZABETH A. CAMPBELL FOR 1ST DELEGATE 2ND MANDATE

Report Covering the Period: From: 2/19/84 To: 3/29/84

	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date	
I. RECEIPTS			
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees	139995	139995	11 (a)
(Memo Entry Unitemized $)			
(b) Political Party Committees			11 (b)
(c) Other Political Committees			11 (c)
(d) The Candidate			11 (d)
(e) TOTAL CONTRIBUTIONS (other than loans (add 11(a), 11(b), 11(c) and 11(d))	139995	139995	11 (e)
12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES			12
13. LOANS:			
(a) Made or Guaranteed by the Candidate			13 (a)
(b) All Other Loans			13 (b)
(c) TOTAL LOANS (add 13 (a) and 13 (b))			13 (c)
14. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)			14
15. OTHER RECEIPTS (Dividends, Interest, etc.)			15
16. TOTAL RECEIPTS (add 11 (e), 12, 13 (c), 14 and 15)	139995	139995	16
II. DISBURSEMENTS			
17. OPERATING EXPENDITURES	126280	126280	17
18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES			18
19. LOAN REPAYMENTS:			
(a) Of Loans Made or Guaranteed by the Candidate			19 (a)
(b) Of All Other Loans			19 (b)
(c) TOTAL LOAN REPAYMENTS (add 19 (a) and 19 (b))			19 (c)
20. REFUNDS OF CONTRIBUTIONS TO:			
(a) Individuals/Persons Other Than Political Committees			20 (a)
(b) Political Party Committees			20 (b)
(c) Other Political Committees			20 (c)
(d) TOTAL CONTRIBUTION REFUNDS (add 20 (a), 20 (b), and 20 (c))			20 (d)
21. OTHER DISBURSEMENTS			21
22. TOTAL DISBURSEMENTS (add 17, 18, 19 (c), 20 (d) and 21)	126280	126280	22

III. CASH SUMMARY

23. CASH ON HAND AT BEGINNING OF REPORTING PERIOD	$ NONE	23
24. TOTAL RECEIPTS THIS PERIOD (From Line 16)	$ 139995	24
25. SUBTOTAL (Add Line 23 and Line 24)	$ 139995	25
26. TOTAL DISBURSEMENTS THIS PERIOD (From Line 22)	$ 126280	26
27. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD Subtract Line 26 from Line 25	$	27

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SCHEDULE A **ITEMIZED RECEIPTS**

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

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

Name of Committee (In Full): 4th DISTRICT DELEGATES FOR MONDALE [illegible] ELIZABETH MICHAEL, TREAS. [illegible] BEAVER FALLS PA.

A. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Date (month, day, year)	Amount of Each Receipt this Period
JAMES McQUOWN 340 CHURCH STREET INDIANA, PA. 15701	COUNTY OF INDIANA COUNTY COMMISSIONER	3-19-84	200.00
Receipt For: X Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—$ 200.00		
B. Full Name, Mailing Address and ZIP Code	**Name of Employer / Occupation**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
YVONNE PATZ R.D.#1. Box 364 BLAIRSVILLE. PA 15717	I.L.C.W.U. UNION STAFF	3-21-84	200.00
Receipt For: X Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—$ 200.00		
C. Full Name, Mailing Address and ZIP Code	**Name of Employer / Occupation**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
LOIS WOOD 806- 3rd STREET BEAVER FALLS PA 15010	COUNTY OF BEAVER COURTHOUSE. BEAVER. PA 15009 REGISTER of WILLS	3-26-84	67.18
Receipt For: X Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—$ 67.18		
D. Full Name, Mailing Address and ZIP Code	**Name of Employer / Occupation**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
JANET L KALAJAINEN. COURT HOUSE NEW CASTLE, PA. 16101	COUNTY OF LAWRENCE COURT HOUSE NEW CASTLE. REGISTER & RECORDER	3-19-84	IN-KIND (SLATE CARDS) 932.80
Receipt For: X Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—$ 732.80		
E. Full Name, Mailing Address and ZIP Code	**Name of Employer / Occupation**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—$		
F. Full Name, Mailing Address and ZIP Code	**Name of Employer / Occupation**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—$		
G. Full Name, Mailing Address and ZIP Code	**Name of Employer / Occupation**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—$		

SUBTOTAL of Receipts This Page (optional)	1397.98
TOTAL This Period (last page this line number only)	1397.98

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SCHEDULE B **ITEMIZED DISBURSEMENTS**

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

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

Name of Committee (In Full)
4th DISTRICT DELEGATES FOR MONDALE ELIZABETH C. McCURDY, TREAS
1205 - 8TH AVE BEAVER FALLS PA 15010

	Purpose of Disbursement / Disbursement for	Date (month, day, year)	Amount of Each Disbursement This Period
A. Full Name, Mailing Address and ZIP Code BOARD: ANDERSON CO 617-3RD STREET BEAVER PA 15009	Purpose of Disbursement: RENT Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	3-23-84	300.00
B. Full Name, Mailing Address and ZIP Code BOROUGH OF BEAVER THIRD STREET BEAVER, PA. 15009	Purpose of Disbursement: SIGN OCCUPANCY + PERMIT Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	3-23-84	30.00
C. Full Name, Mailing Address and ZIP Code JANET L. KALAJAIAN COURT HOUSE NEW CASTLE, PA. 16101	Purpose of Disbursement: RECEIVED IN-KIND CONTRIBUTION SLATE CARDS Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	3-19-84	932.80
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			1262.80
TOTAL This Period (last page this line number only)			1262.80

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

(Summary Page)

ALIGN AREA | ALIGN AREA

1. Name of Committee (In Full)
4TH DISTRICT DELEGATES FOR MONDALE
ELIZABETH M'CURDY, TREASURER

Address (Number and Street)
1205 - 8TH AVENUE P.O. Box 136

City, State and ZIP Code
BEAVER FALLS PA 15010

☐ Check here if address is different than previously reported.

2. FEC Identification Number
C00179846

3. ☒ This committee qualified as a multicandidate committee during this Reporting Period on MARCH 19 1984
(Date)

4. TYPE OF REPORT (Check appropriate box(es))

(a) ☐ April 15 Quarterly Report ☐ October 15 Quarterly Report
☐ July 15 Quarterly Report ☐ January 31 Year End Report
☐ July 31 Mid Year Report (Non-Election Year Only)
☐ Monthly Report for _____
☐ Twelfth day report preceding _____ (Type of Election)
election on _____ in the State of _____
☐ Thirtieth day report following the General Election
on APRIL 10TH in the State of PENNSYLVANIA
☒ Termination Report

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

SUMMARY	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period 3-30-84 through 5-9-84		
6. (a) Cash on hand January 1, 19 84		$ NONE
(b) Cash on Hand at Beginning of Reporting Period	$ 132.18	
(c) Total Receipts (from Line 18)	$ 10,530.00	$ 11,929.98
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ 10,662.18	$ 11,929.98
7. Total Disbursements (from Line 28)	$ 10,662.18	$ 11,929.98
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ NONE	$ NONE
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)	$ NONE	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	$ NONE	

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

ELIZABETH M'CURDY
Type or Print Name of Treasurer

Elizabeth M'Curdy 5-7-84
SIGNATURE OF TREASURER Date

For further information contact:
Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4068

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

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

FEC FORM 3X (3/80)

EXHIBIT "C"

85040508817

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

Name of Committee (In Full): 4TH DISTRICT DELEGATES FOR MONDALE
Full Name, Mailing Address, and Treasurer: FAIR MARTIN MUNRO, TREASURER

Report Covering the Period: From: 3-3N-84 To: 4- -84

	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date	
I. RECEIPTS			
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees			11(a)
(Memo Entry Unitemized $ _____)			
(b) Political Party Committees			11(b)
(c) Other Political Committees			11(c)
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c))	10,530.00	11,929.98	11(d)
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES	NONE	NONE	12
13. ALL LOANS RECEIVED	NONE	NONE	13
14. LOAN REPAYMENTS RECEIVED	NONE	NONE	14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	NONE	NONE	15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	NONE	NONE	16
17. OTHER RECEIPTS (Dividends, Interest, etc.)	NONE	NONE	17
18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)	10,530.00	11,929.98	18
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES	10,671.8	11,929.98	19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES	NONE	NONE	20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	NONE	NONE	21
22. INDEPENDENT EXPENDITURES (use Schedule E)			22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. § 441 a(d)) (Use Schedule F)			23
24. LOAN REPAYMENTS MADE	NONE	NONE	24
25. LOANS MADE	NONE	NONE	25
26. REFUNDS OF CONTRIBUTIONS TO			
(a) Individuals/Persons Other Than Political Committees			26(a)
(b) Political Party Committees			26(b)
(c) Other Political Committees			26(c)
(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))			26(d)
27. OTHER DISBURSEMENTS			27
28. TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	10,671.8	11,929.98	28
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)	10,530.00	11,929.98	29
30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)			30
31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)			31
32. TOTAL OPERATING EXPENDITURES from Line 19	10,671.8	11,929.98	32
33. OFFSETS TO OPERATING EXPENDITURES from Line 15			33
34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)	10,671.8	11,929.98	34

Page 1 of 1 for LINE NUMBER ____
(Use separate schedule(s) for each category of the Detailed Summary Page)

SCHEDULE A **ITEMIZED RECEIPTS**

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

Name of Committee (in Full)
42 DISTRICT DELEGATES FOR MONDALE 1225 - 3RD AVENUE BEAVER FALLS PA 15010
ELIZABETH MILLER TREAS.

A. Full Name, Mailing Address and ZIP Code U.A.W. V. C.A.P. 8000 EAST JEFFERSON AVE DETROIT, MICHIGAN 48214 Receipt For: ☐ Primary ☐ General ☒ Other (specify): ELECT DELEGATES	Name of Employer UNITED AUTOMOBILE WORKERS 48214 DETROIT MICH. Occupation Aggregate Year-to-Date—$ 3500.00	Date (month, day, year) 4/2/84	Amount of Each Receipt this Period 3500.00
B. Full Name, Mailing Address and ZIP Code I.L.G.W.U. 1710 BROADWAY NEW YORK, N.Y. 10019 Receipt For: ☐ Primary ☐ General ☒ Other (specify): ELECT DELEGATES	Name of Employer ILGWU CAMPAIGN COMMITTEE NEW YORK N.Y. Occupation INTERNATIONAL LADIES GARMENT WKRS Aggregate Year-to-Date—$ 5000.00	Date (month, day, year) 4/2/84	Amount of Each Receipt This Period 5000.00
C. Full Name, Mailing Address and ZIP Code WOMEN OF POLITICAL ACTION NEW CASTLE PA 16101 Receipt For: ☐ Primary ☐ General ☒ Other (specify): ELECT DELEGATES	Name of Employer WOMEN OF POLITICAL ACTION Occupation Aggregate Year-to-Date—$ 30.00	Date (month, day, year) 4/4/84	Amount of Each Receipt This Period 30.00
D. Full Name, Mailing Address and ZIP Code UNITED STEEL WORKERS OF AMERICA P.A.C. FIVE GATEWAY CENTER FITTSBURGH PA 15222 Receipt For: ☐ Primary ☐ General ☒ Other (specify): ELECT DELEGATES	Name of Employer U S W A. Occupation Aggregate Year-to-Date—$ 2000.00	Date (month, day, year) 4/9/84	Amount of Each Receipt This Period 2000.00
E. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
F. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
G. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period

SUBTOTAL of Receipts This Page (optional)	10,530.00
TOTAL This Period (last page this line number only)	10,530.00

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SCHEDULE B **ITEMIZED DISBURSEMENTS**

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Name of Committee (In Full)
4th DISTRICT DELEGATES FOR MONDALE Box 136, 15010
ELIZABETH M'CURDY TREAS. 1205-18TH AVE BEAVER FALLS PA

A. Full Name, Mailing Address and ZIP Code BEAVER COUNTY DEMOCRAT BANQUET COMMITTEE COURT HOUSE BEAVER PA 15009	Purpose of Disbursement 3 SOCIAL EIGHT DINNERS Disbursement for: ☐ Primary ☐ General ☒ Other (specify): 4th DELEGATES	Date (month, day, year) 3/31/84	Amount of Each Disbursement This Period 68.00
B. Full Name, Mailing Address and ZIP Code PHILIP DUFOUR 2016 WEDGEWOOD AVE., ALEXANDRIA, LA 71301	Purpose of Disbursement TRAVEL EXPENSE AND SERVICES RENDERED Disbursement for: ☐ Primary ☐ General ☐ Other (specify): 4th DELEGATES	Date (month, day, year) 4/3/84	Amount of Each Disbursement This Period 448.00
C. Full Name, Mailing Address and ZIP Code PATRICIA FENTON 22 DIRICO STREET PORTLAND, ME. 04102	Purpose of Disbursement SERVICES RENDERED Disbursement for: ☐ Primary ☐ General ☐ Other (specify): 4th DELEGATES	Date (month, day, year) 4/3/84	Amount of Each Disbursement This Period 400.00
D. Full Name, Mailing Address and ZIP Code THE NEWS COMPANY 27-33 N. MERCER STREET NEW CASTLE PA 16103	Purpose of Disbursement DISPLAY AD Disbursement for: ☐ Primary ☐ General ☒ Other (specify): 4th DELEGATES	Date (month, day, year) 4/3/84	Amount of Each Disbursement This Period 214.20
E. Full Name, Mailing Address and ZIP Code INDIANA GAZETTE INDIANA PA	Purpose of Disbursement DISPLAY AD Disbursement for: ☐ Primary ☐ General ☒ Other (specify): 4th DELEGATES	Date (month, day, year) 4/3/84	Amount of Each Disbursement This Period 165.00
F. Full Name, Mailing Address and ZIP Code BEAVER COUNTY TIMES FAIR AVENUE BEAVER, PA, 15009	Purpose of Disbursement DISPLAY ADS Disbursement for: ☐ Primary ☐ General ☒ Other (specify): 4th DELEGATES	Date (month, day, year) 4/3/84	Amount of Each Disbursement This Period 907.20 ✓
G. Full Name, Mailing Address and ZIP Code WORKMANS PRINTING 103 S. MILL ST NEW CASTLE PA 16101	Purpose of Disbursement POLITICAL SCATE CARDS Disbursement for: ☐ Primary ☐ General ☒ Other (specify): 4th DELEGATES	Date (month, day, year) 4/3/84	Amount of Each Disbursement This Period 638.60
H. Full Name, Mailing Address and ZIP Code ELLWOOD CITY LEDGER 535 LAWRENCE AVENUE ELLWOOD CITY PA 16117	Purpose of Disbursement DISPLAY AD Disbursement for: ☐ Primary ☐ General ☒ Other (specify): 4th DELEGATES	Date (month, day, year) 4/4/84	Amount of Each Disbursement This Period 179.85
I. Full Name, Mailing Address and ZIP Code BEAVER COUNTY TIMES FAIR AVENUE BEAVER PA 15009	Purpose of Disbursement DISPLAY AD Disbursement for: ☐ Primary ☐ General ☒ Other (specify): 4th DELEGATES	Date (month, day, year) 4/4/84	Amount of Each Disbursement This Period 21.20 ✓
SUBTOTAL of Disbursements This Page (optional)			3042.05
TOTAL This Period (last page this line number only)			

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SCHEDULE B **ITEMIZED DISBURSEMENTS**

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Name of Committee (In Full)
PA DIST #11 DELEGATES FOR MONDALE BIDEN - 15016
ELIZABETH McCURDY TREAS 1202 8th AVE BEAVER FALLS PA

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
WMBA 241-14th STREET AMBRIDGE PA 15003	POLITICAL RADIO SPOTS Disbursement for: ☐Primary ☐General ☒Other (specify): ELECT DELEGATES	4/4/84	222.40
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
BUTLER EAGLE 114 W DIAMOND ST. BUTLER PA 16001	POLITICAL AD Disbursement for: ☐Primary ☐General ☒Other (specify): ELECT DELEGATES	4/4/84	191.30
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
WBVP SEVENTH AVE BEAVER FALLS PA 15010	POLITICAL RADIO SPOTS Disbursement for: ☐Primary ☐General ☒Other (specify): ELECT DELEGATES	4/4/84	119.00
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
ALIQUIPPA DEMOCRATIC TOWN COMMITTEE ALIQUIPPA PA 15001	ELECTION DAY WORKERS Disbursement for: ☐Primary ☐General ☒Other (specify): ELECT DELEGATES	4/4/84	500.00
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
MARTY HODGE 612 OHIO AVENUE MIDLAND PA 15059	CLERK HEADQUARTERS Disbursement for: ☐Primary ☐General ☒Other (specify): ELECT DELEGATES	4/5/84	50.00
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
WFEM 226-5th ST ELLWOOD CITY PA 16117	POLITICAL RADIO SPOTS Disbursement for: ☐Primary ☐General ☒Other (specify): ELECT DELEGATES	4/5/84	124.50
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
WISR MAIN STREET BUTLER PA 16001	POLITICAL RADIO SPOTS Disbursement for: ☐Primary ☐General ☒Other (specify): ELECT DELEGATES	4/5/84	124.40
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
WDAD OAKLAND & SCHOOL ST. INDIANA PA 15701	POLITICAL RADIO SPOTS Disbursement for: ☐Primary ☐General ☒Other (specify): ELECT DELEGATES	4/5/84	156.90
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
WACB KITTANING PA 16201	POLITICAL RADIO SPOTS Disbursement for: ☐Primary ☐General ☒Other (specify): ELECT DELEGATES	4/5/84	124.63
SUBTOTAL of Disbursements This Page (optional)			1613 13
TOTAL This Period (last page this line number only)			

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SCHEDULE B **ITEMIZED DISBURSEMENTS**

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Name of Committee (in Full)
PA DISTRICT DELEGATES FOR MONDALE
ELISABETH McCURDY, TREASURER

	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Full Name, Mailing Address and ZIP Code WKST NEW CASTLE PA 16101	RADIO SPOTS Disbursement for: ☐ Primary ☐ General ☒ Other (specify): PA DELEGATES	4/5/84	127.00
B. Full Name, Mailing Address and ZIP Code WBZY NEW CASTLE 16101	POLITICAL AD Disbursement for: ☐ Primary ☐ General ☒ Other (specify):	4/5/84	126.50
C. Full Name, Mailing Address and ZIP Code LEADER TIMES 117 N GRANT STREET KITTANNING PA 16201	POLITICAL AD Disbursement for: ☐ Primary ☐ General ☒ Other (specify):	4/5/84	173.80
D. Full Name, Mailing Address and ZIP Code DICK SCHONTZ 284 CLEVELAND ST BUTLER PA 16003	SERVICES RENDERED Disbursement for: ☐ Primary ☐ General ☒ Other (specify): PA DELEGATES	4/6/84	500.00
E. Full Name, Mailing Address and ZIP Code JAN KALAJAINEN COURT HOUSE NEW CASTLE PA 16101	BAL DUE FOR POLITICAL CARDS Disbursement for: ☐ Primary ☐ General ☒ Other (specify): PA DELEGATES	4/7/84	83.74
F. Full Name, Mailing Address and ZIP Code YVONNE PATZ R.D.#1 BOX 364 BLAIRSVILLE PA 15717	SERVICES RENDERED Disbursement for: ☐ Primary ☐ General ☒ Other (specify): PA DELEGATES	4/7/84	200.00
G. Full Name, Mailing Address and ZIP Code PATTI FENTON 22 DIRIGO ST PORTLAND ME 04102	REIMBURSEMENT TRAVEL EXPENSES Disbursement for: ☐ Primary ☐ General ☒ Other (specify): PA DELEGATES	4/7/84	111.00
H. Full Name, Mailing Address and ZIP Code JAMES MACRY 1533-3RD AVENUE NEW BRIGHTON PA 15066	ELECTION NIGHT EXPENSES Disbursement for: ☐ Primary ☐ General ☒ Other (specify): PA DELEGATES	4/7/84	200.00
I. Full Name, Mailing Address and ZIP Code STEVE CAREY 718-5TH AVENUE PITTSBURGH PA 15219	SERVICES RENDERED Disbursement for: ☐ Primary ☐ General ☒ Other (specify): PA DELEGATES	4/9/84	150.00
SUBTOTAL of Disbursements This Page (optional)			1672.04
TOTAL This Period (last page this line number only)			

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SCHEDULE B **ITEMIZED DISBURSEMENTS**

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Name of Committee (in Full)
4th DISTRICT DELEGATES FOR MONDALE BOX 186 15[illegible]
ELIZABETH McCURDY TREAS. 1205 3rd AVE. BEAVER FALLS PA.

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
TOM COHEN 3235 FAIRHAVEN ST. PITTSBURGH PA 15217	SERVICES RENDERED Disbursement for: ☐Primary ☐General ☒Other (specify): ELECT DELEGATES	4/9/84	150.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
GREG PASTOR 506 VALE AVENUE 15237 PLUM BORO PITTSBURGH PA	SERVICES RENDERED Disbursement for: ☐Primary ☐General ☒Other (specify): ELECT DELEGATES	4/9/84	150.00
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
JOHN ULIZIO 334 INSURANCE STREET BEAVER PA 15009	POSTAGE Disbursement for: ☐Primary ☐General ☒Other (specify): ELECT DELEGATES	4/9/84	20.00
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
CLEM OTTAVIA 509 PARK AVENUE ELLWOOD CITY PA 16117	SERVICES RENDERED Disbursement for: ☐Primary ☐General ☒Other (specify): ELECT DELEGATES	4/9/84	20.00
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
CAROLINE OTTAVIA 509 PARK AVENUE ELLWOOD CITY PA 16117	SERVICES RENDERED Disbursement for: ☐Primary ☐General ☒Other (specify): ELECT DELEGATES	4/9/84	20.00
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
PATTY MAYBRAY CRESCENT AVENUE ELLWOOD CITY PA 16117	SERVICES RENDERED Disbursement for: ☐Primary ☐General ☒Other (specify): ELECT DELEGATES	4/9/84	20.00
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
LINDA EMEC 108 BEAVER AVENUE ELLWOOD CITY PA 16117	SERVICES RENDERED Disbursement for: ☐Primary ☐General ☒Other (specify): ELECT DELEGATES	4/9/84	20.00
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
JONY SIRAMELLA 40 PITTSBURGH CIRCLE ELLWOOD CITY PA 16117	SERVICES RENDERED Disbursement for: ☐Primary ☐General ☒Other (specify): ELECT DELEGATES	4/9/84	20.00
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
JEANN STRAMELLA 40 PITTSBURGH CIRCLE ELLWOOD CITY PA 16117	SERVICES RENDERED Disbursement for: ☐Primary ☐General ☒Other (specify): ELECT DELEGATES	4/9/84	20.00
SUBTOTAL of Disbursements This Page (optional)			440.00
TOTAL This Period (last page this line number only)			

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SCHEDULE B **ITEMIZED DISBURSEMENTS**

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

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Name of Committee (In Full) 4th DIST. DELEGATES FOR MONDALE Box 136
ELIZABETH McCURDY TREASURER
1225 - 8th AVENUE, BEAVER FALLS, PA. 15010

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
VITO STRAMELLA 220 GLENN AVENUE ELLWOOD CITY PA 16117	SERVICES RENDERED Disbursement for: ☐ Primary ☐ General ☒ Other (specify): ELECT DELEGATES	4/9/84	20.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
ROSE STRAMELLA 220 GLENN AVENUE ELLWOOD CITY PA 16117	SERVICES RENDERED Disbursement for: ☐ Primary ☐ General ☒ Other (specify): ELECT DELEGATES	4/9/84	20.00
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
NICK JENNIE GREEN [illegible] ELLWOOD CITY, PA 16117	SERVICES RENDERED Disbursement for: ☐ Primary ☐ General ☒ Other (specify): ELECT DELEGATES	4/9/84	20.00
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
ADA JANELLE 120 [illegible] CREEK ST. ELLWOOD CITY PA 16117	SERVICES RENDERED Disbursement for: ☐ Primary ☐ General ☒ Other (specify): ELECT DELEGATES	4/9/84	20.00
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
RALPH FERRANTE 724 - 1st ST ELLWOOD CITY PA 16117	SERVICES RENDERED Disbursement for: ☐ Primary ☐ General ☒ Other (specify): ELECT DELEGATES	4/9/84	20.00
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
JAMES KRAWCHAK 525 - 1st Avenue ELLWOOD CITY PA 16117	SERVICES RENDERED Disbursement for: ☐ Primary ☐ General ☒ Other (specify): ELECT DELEGATES	4/9/84	20.00
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
CHERYL PRATT 424 HAZEL AVENUE ELLWOOD CITY PA 16117	SERVICES RENDERED Disbursement for: ☐ Primary ☐ General ☒ Other (specify): ELECT DELEGATES	4/9/84	20.00
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
MICHELLE LAMENZE FOCH STREET ELLWOOD CITY PA 16117	SERVICES RENDERED Disbursement for: ☐ Primary ☐ General ☒ Other (specify): ELECT DELEGATES	4/9/84	20.00
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
STEPHANIE LAMENZE WOOD SIDE AVE ELLWOOD CITY PA 16117	SERVICES RENDERED Disbursement for: ☐ Primary ☐ General ☒ Other (specify): ELECT DELEGATES	4/9/84	20.00
SUBTOTAL of Disbursements This Page (optional)			150.00
TOTAL This Period (last page this line number only)			

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LINE NUMBER ____
(Use separate schedule(s) for each category of the Detailed Summary Page)

SCHEDULE B **ITEMIZED DISBURSEMENTS**

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Name of Committee (In Full) 4TH DIST. DELEGATES FOR MONDALE Box 136 15116
ELIZABETH McCURDY, TREAS. 1205 8TH AVE. BEAVER FALLS PA

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
JAMES MILTO 909 SUNSET BLVD. ELLWOOD CITY, PA. 16117	SERVICES RENDERED Disbursement for: ☐ Primary ☐ General ☒ Other (specify): ELECT DELEGATES	4/9/84	20.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
BARBARA OSBORNE 808 SUNSET BLVD. ELLWOOD CITY, PA 16117	SERVICES RENDERED Disbursement for: ☐ Primary ☐ General ☒ Other (specify): ELEC DELEGATES	4/9/84	20.00
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
BECKY STEWART R.D. #2 PORTERSVILLE, PA.	SERVICES RENDERED Disbursement for: ☐ Primary ☐ General ☒ Other (specify): ELECT DELEGATES	4/9/84	20.00
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
BUTCH ROBINSKY 334 FOUNTAIN AVE ELLWOOD CITY, PA. 16117	SERVICES RENDERED Disbursement for: ☐ Primary ☐ General ☒ Other (specify): ELECT DELEGATES	4/9/84	20.00
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
CATHERINE PROCOPIO R.D #1 WAMPUM PA	SERVICES RENDERED Disbursement for: ☐ Primary ☐ General ☒ Other (specify): ELECT DELEGATES	4/9/84	20.00
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
GERALDINE BLEAKEY R.D #1 Box 136 ELLWOOD CITY PA. 16117	SERVICES RENDERED Disbursement for: ☐ Primary ☐ General ☒ Other (specify): ELECT DELEGATES	4/9/84	20.00
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
EVERETTE BLEAKEY R.D #1 Box 136 ELLWOOD CITY, PA. 16117	SERVICES RENDERED Disbursement for: ☐ Primary ☐ General ☒ Other (specify): ELECT DELEGATES	4/9/84	20.00
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
ANITA O'DONNELL 314-13 STREET ELLWOOD CITY, PA. 16117	SERVICES RENDERED Disbursement for: ☐ Primary ☐ General ☒ Other (specify): ELECT DELEGATES	4/9/84	20.00
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
RON O'DONNELL 314-13TH STREET ELLWOOD CITY PA 16117	SERVICES RENDERED Disbursement for: ☐ Primary ☐ General ☒ Other (specify): ELECT DELEGATES	4/9/84	20.00
SUBTOTAL of Disbursements This Page (optional)			180.00
TOTAL This Period (last page this line number only)			

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SCHEDULE B **ITEMIZED DISBURSEMENTS**

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Name of Committee (In Full)
4th DISTRICT DELEGATES FOR MONDALE Box 136 15010
ELIZABETH McELROY TREAS 1205-8th AVE BEAVER FALLS PA

A. Full Name, Mailing Address and ZIP Code STEVE BATTAGLIA 1013 CENTER AVENUE ELLWOOD CITY, PA 16117	Purpose of Disbursement SERVICES RENDERED Disbursement for: ☐ Primary ☐ General ☒ Other (specify): ALL DELEGATES	Date (month, day, year) 4/9/84	Amount of Each Disbursement This Period 20.00
B. Full Name, Mailing Address and ZIP Code FRANCES BATTAGLIA 1013 CENTER AVENUE ELLWOOD CITY, PA 16117	Purpose of Disbursement SERVICES RENDERED Disbursement for: ☐ Primary ☐ General ☒ Other (specify): ALL DELEGATES	Date (month, day, year) 4/9/84	Amount of Each Disbursement This Period 20.00
C. Full Name, Mailing Address and ZIP Code DARIN MORILLA STATE STREET ELLPORT PA 16117	Purpose of Disbursement SERVICES RENDERED Disbursement for: ☐ Primary ☐ General ☒ Other (specify): ALL DELEGATES	Date (month, day, year) 4/9/84	Amount of Each Disbursement This Period 20.00
D. Full Name, Mailing Address and ZIP Code ROBERT R CARSELE REAR 1013 CENTER AVE. ELLWOOD CITY PA 16117	Purpose of Disbursement SERVICES RENDERED Disbursement for: ☐ Primary ☐ General ☒ Other (specify): ALL DELEGATES	Date (month, day, year) 4/9/84	Amount of Each Disbursement This Period 20.00
E. Full Name, Mailing Address and ZIP Code DOROTHY CARSELE 8 GLEN AVENUE ELLWOOD CITY PA 16117	Purpose of Disbursement SERVICES RENDERED Disbursement for: ☐ Primary ☐ General ☒ Other (specify): ALL DELEGATES	Date (month, day, year) 4/9/84	Amount of Each Disbursement This Period 20.00
F. Full Name, Mailing Address and ZIP Code MARY LYTTLE 105 SPRING AVENUE ELLWOOD CITY PA 16117	Purpose of Disbursement SERVICES RENDERED Disbursement for: ☐ Primary ☐ General ☒ Other (specify): ALL DELEGATES	Date (month, day, year) 4/9/84	Amount of Each Disbursement This Period 20.00
G. Full Name, Mailing Address and ZIP Code MARY FAVICH LINE AVENUE ELLWOOD CITY PA 16117	Purpose of Disbursement SERVICES RENDERED Disbursement for: ☐ Primary ☐ General ☒ Other (specify): ALL DELEGATES	Date (month, day, year) 4/9/84	Amount of Each Disbursement This Period 20.00
H. Full Name, Mailing Address and ZIP Code TOM SANDERS GLEN AVENUE ELLWOOD CITY PA 16117	Purpose of Disbursement SERVICES RENDERED Disbursement for: ☐ Primary ☐ General ☒ Other (specify): ALL DELEGATES	Date (month, day, year) 4/9/84	Amount of Each Disbursement This Period 20.00
I. Full Name, Mailing Address and ZIP Code ROSA SANDERS GLEN AVENUE ELLWOOD CITY PA 16117	Purpose of Disbursement SERVICES RENDERED Disbursement for: ☐ Primary ☐ General ☒ Other (specify): ALL DELEGATES	Date (month, day, year) 4/9/84	Amount of Each Disbursement This Period 20.00
SUBTOTAL of Disbursements This Page (optional)			180.00
TOTAL This Period (last page this line number only)			

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

SCHEDULE B — ITEMIZED DISBURSEMENTS

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)
4TH DIST ELECT DELEGATES FOR MONDALE Box 136 15108
ELIZABETH MCKROY, TREAS. 1205 8TH AVE BEAVER FALLS PA

	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Full Name, Mailing Address and ZIP Code CONWAY DEMOCRAT COMMITTEE 110 - 10th STREET CONWAY PA 15027	SERVICES RENDERED Disbursement for: ☐ Primary ☐ General ☒ Other (specify): ELECT DELEGATES	4/9/84	100.00
B. Full Name, Mailing Address and ZIP Code MAXINE SEBASTIAN 974 ANTHONY WAYNE DR. BADEN PA 15005	Purpose of Disbursement SERVICES RENDERED Disbursement for: ☐ Primary ☐ General ☒ Other (specify): ELECT DELEGATES	Date (month, day, year) 4/9/84	Amount of Each Disbursement This Period 20.00
C. Full Name, Mailing Address and ZIP Code CAROL WEDGE 989 OLGA STREET AMBRIDGE PA 15003	Purpose of Disbursement SERVICES RENDERED Disbursement for: ☐ Primary ☐ General ☒ Other (specify): ELECT DELEGATES	Date (month, day, year) 4/9/84	Amount of Each Disbursement This Period 20.00
D. Full Name, Mailing Address and ZIP Code LENORA HIMME 2543 BEAVER RD. AMBRIDGE PA 15003	Purpose of Disbursement SERVICES RENDERED Disbursement for: ☐ Primary ☐ General ☒ Other (specify): ELECT DELEGATES	Date (month, day, year) 4/9/84	Amount of Each Disbursement This Period 25.00
E. Full Name, Mailing Address and ZIP Code ALBERT TOMEI 514 DEARBURN STREET BADEN PA 15005	Purpose of Disbursement SERVICES RENDERED Disbursement for: ☐ Primary ☐ General ☒ Other (specify): ELECT DELEGATES	Date (month, day, year) 4/9/84	Amount of Each Disbursement This Period 25.00
F. Full Name, Mailing Address and ZIP Code TONY MONTELLANICO 2598 WOODLAND RD AMBRIDGE PA 15003	Purpose of Disbursement SERVICES RENDERED Disbursement for: ☐ Primary ☐ General ☒ Other (specify): ELECT DELEGATES	Date (month, day, year) 4/9/84	Amount of Each Disbursement This Period 25.00
G. Full Name, Mailing Address and ZIP Code SAM GIORDANO 1107 AVONDALE DR. INDUSTRY PA 15054	Purpose of Disbursement SERVICES RENDERED Disbursement for: ☐ Primary ☐ General ☒ Other (specify): ELECT DELEGATES	Date (month, day, year) 4/9/84	Amount of Each Disbursement This Period 20.00
H. Full Name, Mailing Address and ZIP Code AMBRIDGE DEM. COMMITTEE 1515 LENZ AVENUE AMBRIDGE PA 15003	Purpose of Disbursement SERVICES RENDERED Disbursement for: ☐ Primary ☐ General ☒ Other (specify): ELECT DELEGATES	Date (month, day, year) 4/9/84	Amount of Each Disbursement This Period 350.00
I. Full Name, Mailing Address and ZIP Code MARIE MULROY 1204 7th AVENUE BEAVER FALLS PA 15010	Purpose of Disbursement SERVICES RENDERED Disbursement for: ☐ Primary ☐ General ☒ Other (specify): ELECT DELEGATES	Date (month, day, year) 4/9/84	Amount of Each Disbursement This Period 15.00
SUBTOTAL of Disbursements This Page (optional)			600.00
TOTAL This Period (last page this line number only)			

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Page 9 of 12 Pages
LINE NUMBER: _____
(Use separate schedule(s) for each category of the Detailed Summary Page)

SCHEDULE B **ITEMIZED DISBURSEMENTS**

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)
4 J DISTRICT DELEGATES FOR MONDALE BIRTH 1500
ELIZABETH M°CARDY 1265-5th AVE, BEAVER FALLS PA

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
PHILIP DUFOUR 2016 WEDGEWOOD AVE, ALEXANDRIA, LA 71301	TRAVEL EXPENSES Disbursement for: ☐Primary ☐General ☐ Other (specify): DELEGATES	4/10/84	66.14
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
BEAVER CO. DEMOCRAT PROGRAM BOOKLET COMM. DRAVO STREET BEAVER PA 15009	POLITICAL AD Disbursement for: ☐Primary ☐General ☐ Other (specify): DELEGATES	4/10/84	100.00
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
AMERICAN INTERNATIONAL CAR RENTAL 810 NARROWS RUN ROAD CORAOPOLIS PA 15108	CAR RENTAL Disbursement for: ☐Primary ☐General ☐ Other (specify): CHIEF DELEGATES	4/11/84	1,118.46
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
WAC.B - RADIO KITTANNING PA 16201	BALDUE - POL. SPOTS Disbursement for: ☐Primary ☐General ☒ Other (specify): CHIEF DELEGATES	4/12/84	26.87
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
JOE CINI R&H 2 HALLTOWN ROAD WAMPUM PA 16157	SERVICES RENDERED Disbursement for: ☐Primary ☐General ☒ Other (specify): DELEGATES	4/20/84	20.00
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
CAROL SHAFFER 1016 RIDGEVIEW DR. NEW CASTLE PA 16101	SERVICES RENDERED Disbursement for: ☐Primary ☐General ☒ Other (specify): DELEGATES	4/20/84	20.00
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
THOMAS KELLY 914 LORRAINE AVENUE NEW CASTLE PA 16101	SERVICES RENDERED Disbursement for: ☐Primary ☐General ☒ Other (specify): DELEGATES	4/20/84	20.00
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
CHESTER CRELLI 757 LATHROP STREET NEW CASTLE PA 16101	SERVICES RENDERED Disbursement for: ☐Primary ☐General ☒ Other (specify): DELEGATES	4/23/84	20.00
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
JAMES FOLINO 125 N. NORTH STREET RIVERSIDE APTS. NEW CASTLE PA 16101	SERVICES RENDERED Disbursement for: ☐Primary ☐General ☒ Other (specify): DELEGATES	4/23/84	20.00
SUBTOTAL of Disbursements This Page (optional)			1,411.47
TOTAL This Period (last page this line number only)			

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SCHEDULE B **ITEMIZED DISBURSEMENTS**

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)
4TH DISTRICT DELEGATES FOR MONDALE Pol 176 15618
ELIZABETH McCURDY TREAS 1205-8TH AVE BEAVER FALLS PA

A. Full Name, Mailing Address and ZIP Code GUY BARBATO 1029½ S MILL ST. NEW CASTLE PA 16101	Purpose of Disbursement SERVICES RENDERED Disbursement for: ☐ Primary ☐ General ☒ Other (specify): DELEGATES	Date (month, day, year) 4/23/84	Amount of Each Disbursement This Period 200.00
B. Full Name, Mailing Address and ZIP Code EDWARD PAVLOV R.D #1 WEST MIDDLESEX PA 16159	Purpose of Disbursement SERVICES RENDERED Disbursement for: ☐ Primary ☐ General ☒ Other (specify): DELEGATES	Date (month, day, year) 4/23/84	Amount of Each Disbursement This Period 200.00
C. Full Name, Mailing Address and ZIP Code MARK CAMIANUS 329 HATFIELD RUFT AVE NEW CASTLE PA 16105	Purpose of Disbursement SERVICES RENDERED Disbursement for: ☐ Primary ☐ General ☒ Other (specify): DELEGATES	Date (month, day, year) 4/22/84	Amount of Each Disbursement This Period 200.00
D. Full Name, Mailing Address and ZIP Code LARRY PERROTTA 1201 HURON STREET NEW CASTLE PA 16101	Purpose of Disbursement SERVICES RENDERED Disbursement for: ☐ Primary ☐ General ☒ Other (specify): DELEGATES	Date (month, day, year) 4/23/84	Amount of Each Disbursement This Period 20.00
E. Full Name, Mailing Address and ZIP Code ELIZABETH MANRELA 3 W. SHARP STREET NEW CASTLE PA 16101	Purpose of Disbursement SERVICES RENDERED Disbursement for: ☐ Primary ☐ General ☒ Other (specify): DELEGATES	Date (month, day, year) 4/23/84	Amount of Each Disbursement This Period 20.00
F. Full Name, Mailing Address and ZIP Code LISA DORAN 139 E. EDISON AVE., NEW CASTLE PA 16101	Purpose of Disbursement SERVICES RENDERED Disbursement for: ☐ Primary ☐ General ☒ Other (specify): DELEGATES	Date (month, day, year) 4/23/84	Amount of Each Disbursement This Period 20.00
G. Full Name, Mailing Address and ZIP Code RAY GADDICH BOX 248 HILLSVILLE PA 16132	Purpose of Disbursement SERVICES RENDERED Disbursement for: ☐ Primary ☐ General ☒ Other (specify): DELEGATES	Date (month, day, year) 4/23/84	Amount of Each Disbursement This Period 20.00
H. Full Name, Mailing Address and ZIP Code VICTOR FSZEANY 211 W. MOHAWK AVE. NEW CASTLE PA 16101	Purpose of Disbursement SERVICES RENDERED Disbursement for: ☐ Primary ☐ General ☒ Other (specify): DELEGATES	Date (month, day, year) 4/22/84	Amount of Each Disbursement This Period 200.00
I. Full Name, Mailing Address and ZIP Code ARSON, ARMANDO 131 BUELL AVENUE NEW CASTLE PA 16101	Purpose of Disbursement SERVICES RENDERED Disbursement for: ☐ Primary ☐ General ☒ Other (specify): DELEGATES	Date (month, day, year) 4/23/84	Amount of Each Disbursement This Period 20.00
SUBTOTAL of Disbursements This Page (optional)			1820.00
TOTAL This Period (last page this line number only)			

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SCHEDULE B **ITEMIZED DISBURSEMENTS**

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Name of Committee (In Full)
40 DISTRICT DELEGATES FOR MONDALE
ELIZABETH MCURDY TREAS. 1305 5TH AVE BEAVER FALLS PA 15010

A. Full Name, Mailing Address and ZIP Code NICK MACIARELLO 511 WALLACE AVENUE NEW CASTLE, PA. 16101	Purpose of Disbursement SERVICES RENDERED Disbursement for: ☐ Primary ☐ General ☒ Other (specify): DELEGATES	Date (month, day, year) 4/23/84	Amount of Each Disbursement This Period 20.00
B. Full Name, Mailing Address and ZIP Code GREG LYONS 3114 ELLWOOD RD. NEW CASTLE, PA 16101	Purpose of Disbursement SERVICES RENDERED Disbursement for: ☐ Primary ☐ General ☒ Other (specify): DELEGATES	Date (month, day, year) 4/23/84	Amount of Each Disbursement This Period 20.00
C. Full Name, Mailing Address and ZIP Code DOROTHY HILL 3525 HOLLOW ROAD NEW CASTLE PA 16101	Purpose of Disbursement SERVICES RENDERED Disbursement for: ☐ Primary ☐ General ☒ Other (specify): DELEGATES	Date (month, day, year) 4/24/84	Amount of Each Disbursement This Period 20.00
D. Full Name, Mailing Address and ZIP Code LOU QUAHLIERO 215 TREMONT AVE. NEW CASTLE PA. 16102	Purpose of Disbursement SERVICES RENDERED Disbursement for: ☐ Primary ☐ General ☒ Other (specify): DELEGATES	Date (month, day, year) 4/23/84	Amount of Each Disbursement This Period 20.00
E. Full Name, Mailing Address and ZIP Code DEBRA WICTON R.D. #6 BOX 41C NEW CASTLE PA. 16101	Purpose of Disbursement SERVICES RENDERED Disbursement for: ☐ Primary ☐ General ☒ Other (specify): DELEGATES	Date (month, day, year) 4/23/84	Amount of Each Disbursement This Period 20.00
F. Full Name, Mailing Address and ZIP Code DAVID C. HAIRHOLER, SR. RD#1 BOX 132 NEW GALILEE PA 16141	Purpose of Disbursement SERVICES RENDERED Disbursement for: ☐ Primary ☐ General ☒ Other (specify): DELEGATES	Date (month, day, year) 4/23/84	Amount of Each Disbursement This Period 20.00
G. Full Name, Mailing Address and ZIP Code WILMA J. HAIRHOLER R.D. #1 NEW GALILEE PA 16141	Purpose of Disbursement SERVICES RENDERED Disbursement for: ☐ Primary ☐ General ☒ Other (specify): DELEGATES	Date (month, day, year) 4/23/84	Amount of Each Disbursement This Period 20.00
H. Full Name, Mailing Address and ZIP Code BEAVER FALLS PARKING AUTHORITY MUNICIPAL BLDG. BEAVER FALLS, PA 15010	Purpose of Disbursement PARKING FINE Disbursement for: ☐ Primary ☐ General ☒ Other (specify): DELEGATES	Date (month, day, year) 4/25/84	Amount of Each Disbursement This Period 6.30
I. Full Name, Mailing Address and ZIP Code JOHN FEDERICH [illegible] [illegible]	Purpose of Disbursement [illegible] SERVICES RENDERED Disbursement for: ☐ Primary ☐ General ☒ Other (specify): DELEGATES	Date (month, day, year) 4/24/84	Amount of Each Disbursement This Period 20.00
SUBTOTAL of Disbursements This Page (optional)			426.30
TOTAL This Period (last page this line number only)			

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SCHEDULE B

ITEMIZED DISBURSEMENTS

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LINE NUMBER _____
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Name of Committee (In Full)

	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Full Name, Mailing Address and ZIP Code			
	Disbursement for: ☐ Primary ☐ General ☒ Other (specify):		
B. Full Name, Mailing Address and ZIP Code AMERICAN INTERNATIONAL CAR RENTAL SEWARD KEY ROAD CORAOPOLIS PA 15108	Purpose of Disbursement RENTAL FEE	5/7/84	70.00
	Disbursement for: ☐ Primary ☐ General ☒ Other (specify):		
C. Full Name, Mailing Address and ZIP Code SPECIALTY ARCHITECTURE & DESIGN 1001 STATE AVENUE BEAVER FALLS PA 15010	Purpose of Disbursement SHARE OF IAA MONDALE PIN	5/7/84	546.43
	Disbursement for: ☐ Primary ☐ General ☒ Other (specify):		
D. Full Name, Mailing Address and ZIP Code PETER O STEELE 1150 BANK STREET BEAVER PA 15009	Purpose of Disbursement REIMBURSEMENT FOR LODGING	5/7/84	113.16
	Disbursement for: ☐ Primary ☐ General ☒ Other (specify):		
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):		
SUBTOTAL of Disbursements This Page (optional)			742.19
TOTAL This Period (last page this line number only)			106748

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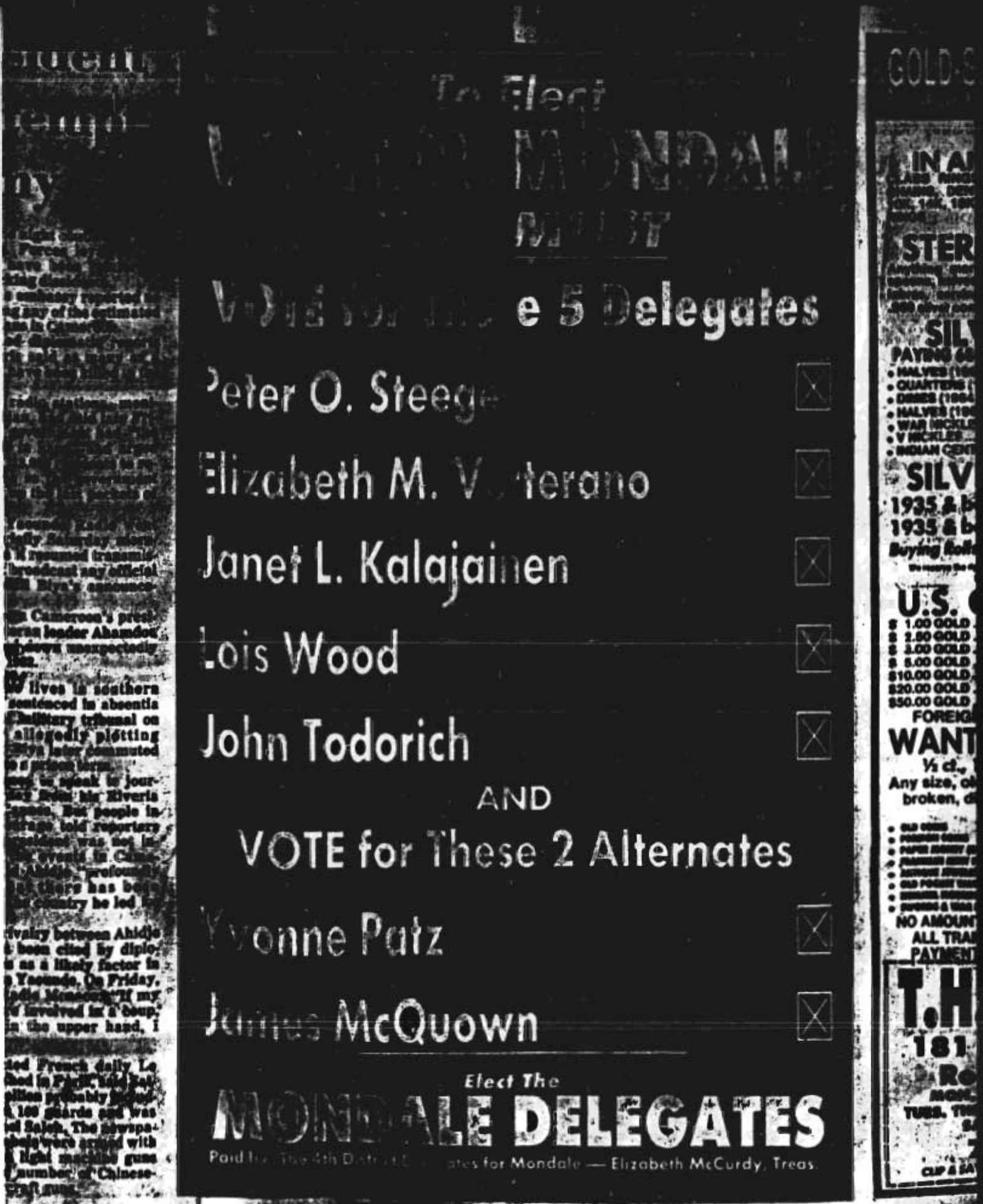

To Elect
MONDALE
e 5 Delegates
Peter O. Steege
Elizabeth M. V terano
Janet L. Kalajainen
Lois Wood
John Todorich
AND
VOTE for These 2 Alternates
Yvonne Patz
James McQuown
Elect The
MONDALE DELEGATES
Paid for by the 6th District Delegates for Mondale — Elizabeth McCurdy, Treas.

EXHIBIT "D"

PEPPER, HAMILTON & SCHEETZ
TWENTIETH FLOOR
THE FIDELITY BUILDING
PHILADELPHIA, PA. 19109

PHILADELPHIA PA MAR 25 '84 U.S. POSTAGE 2.57

PEPPER, HAMILTON & SCHEETZ
ATTORNEYS AT LAW
2001 FIDELITY BUILDING
123 SOUTH BROAD STREET
PHILADELPHIA, PA. 19109

TO

Stephen Mims, Esquire
General Counsel's Office
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 2046

CERTIFIED
P 308 263 052
MAIL

RECEIVED AT THE FEC
Gen. Counsel 3218
HAND DELIVERED

PEPPER, HAMILTON & SCHEETZ

ATTORNEYS AT LAW

1777 F STREET, N.W.
WASHINGTON, D.C. 20006
202-842-8100

10 SOUTH MARKET SQUARE
HARRISBURG, PA 17108
717-255-1155

100 RENAISSANCE CENTER
DETROIT, MI 48243
313-259-7110

50TH FLOOR
THE FIDELITY BUILDING
123 SOUTH BROAD STREET
PHILADELPHIA, PENNSYLVANIA 19109-1099
215-563-2000
CABLE ADDRESS "PEPHIL PHILADELPHIA"
TELECOPIER (FAX) 215-735-6030 • (ALTERNATE) 215-963-8504
DER (WORLD) 215-546-3477 • TWX 710-670-0777

600 SOUTH OLIVE STREET
LOS ANGELES, CA 90014
213-617-8151

512 HAMILTON STREET
ALLENTOWN, PA 18101
215-434-0104

511 OBSERVATORY PARK DRIVE
WHITE PLAINS, NY 10604
914-694-6800

WRITER'S DIRECT DIAL NUMBER
(215) 893-3995

4 pp.

May 18, 1984

MUR 1667
Mims

VIA FEDERAL EXPRESS

Stephen Mims, Esquire
General Counsel's Office
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: Americans with Hart, Inc. v. Mondale for President Committee, Inc., MUR 1667

Dear Mr. Mims:

I have been approached by several Mondale district delegate committees in Pennsylvania and have been asked to represent them now that they have been served in the above-captioned matter. To date, I have received materials from two such committees, the Fourth District Delegates for Mondale and the Pennsylvania Seventeenth Congressional District Delegates for Mondale. I am expecting materials from a number of others. Enclosed is a statement of designation of counsel for the Fourth District committee. The committee for the Seventeenth District forgot to fill out its statement, which will be forwarded to you as soon as it is received.

I do not know how many of these committees I or my firm will eventually represent, not do I have any idea how long it will take for the necessary materials to reach me. Your mailings to the district committees appear to have been received on May 14 or 15, thereby making responses due on May 29 or 30.

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While I appreciate the Commission's general view regarding extentions, I believe that an extention, until June 15, for the responses of the Pennsylvania district delegate committees is warranted. In light of the peripheral involvement of the district committees in this matter, grant of the requested extention would not hinder the Commission's deliberations. This extention would allow me to ensure that any charges against the district delegate committees are responded to in a complete and orderly fashion even as to latecomers.

Thank you for your consideration of this request. Please advise me as soon as possible of the Commission decision.

Yours truly,

James M. Beck

JMB/ms

Enclosure

8504050083 5

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1667

NAME OF COUNSEL: JAMES M. BECK

ADDRESS: Pepper, Hamilton & Scheetz
123 South Broad Street
Philadelphia, PA 19109

TELEPHONE: 215 893 3995

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 15, 1984
Date

Elizabeth McCurdy Treas
Signature

RESPONDENT'S NAME: Elizabeth McCurdy, Treasurer

ADDRESS: 4th District Delegates for Mondale
1205 8th Avenue, P.O. Box 136
Beaver Falls, PA 15010

HOME PHONE: (412) 728-0620

BUSINESS PHONE: (412) 843-6220

8504050836

James M. Beck

PEPPER, HAMILTON & SCHEETZ
20TH FLOOR
THE FIDELITY BUILDING
123 SOUTH BROAD STREET
PHILADELPHIA, PA. 19109

8 5 0 4 0 5 0 0 3 3 7

AT THE FEC

HAND DELIVERED
84 MAY 21 AM 9:41

Stephen Mims, Esquire
General Counsel's Office
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1667

NAME OF COUNSEL: JAMES M. BECK

ADDRESS: Pepper, Hamilton & Scheetz

123 South Broad Street

Philadelphia, PA 19109

TELEPHONE: 215 893 3995

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 15, 1984
Date

Elizabeth McCurdy, Treasurer
Signature

RESPONDENT'S NAME: Elizabeth McCurdy, Treasurer

ADDRESS: 4th District Delegates for Mondale

1205 8th Avenue, P.O. Box 136

Beaver Falls, PA 15010

HOME PHONE: (412) 728-0620

BUSINESS PHONE: (412) 843-6220

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Elizabeth McCurdy, Treasurer
4th District Delegates for Mondale
1205 Eighth Avenue
PO Box 136
Beaver Falls, PA 15010

Re: MUR 1667

Dear Ms. McCurdy:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

8504050083

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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

8504050084 0

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Elizabeth McCurdy, Treasurer
4th District Delegates for Mondale
1205 Eighth Avenue
PO Box 136
Beaver Falls, PA 15010

Re: MUR 1667

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

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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.

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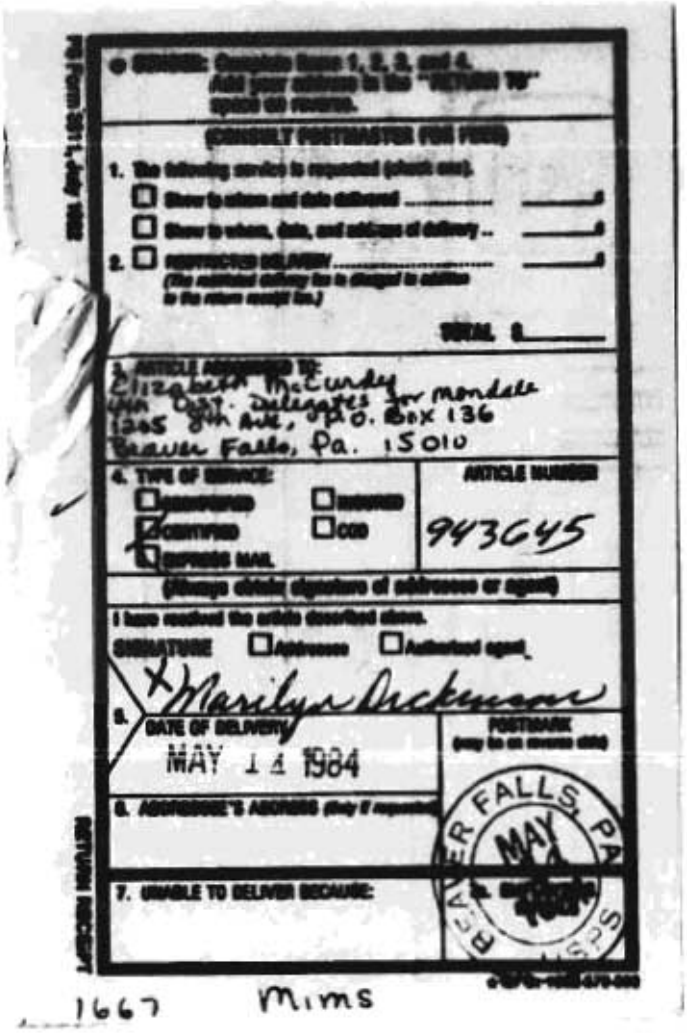
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Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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



1667 Mims

8504050084 2

HL 3454
RECEIVED AT THE FEC
84 JUN 4 P1:24

4 PM 3:30

June 1, 1984

Stephen Mims, Esquire
General Counsel's Office
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: Americans with Hart, Inc. v. Mondale for President Committee, Inc. MUR 1667

Dear Mr. Mims:

This letter and supporting exhibits constitute the response of the Third Congressional District Delegates for Mondale ("Third District Committee" or "Committee") to allegations made in an amended complaint filed with the Federal Election Commission ("FEC") by Americans with Hart, Inc. ("Hart") against Mondale for President Committee ("MPC"). Because the Hart Complaint contains no specific charges against the Third District Committee and because the Committee is not knowledgeable about the activities of other delegate committees or of MPC, this submission will only briefly outline and explain those Third District Committee activities which would appear to be pertinent to Hart's vague charges.

I. Organization

The Committee was organized on March 19, 1984. See Exhibit "A", "Statement of Organization." Alice K. Gardan served as Treasurer. Although the delegate candidates had received some literature from MPC explaining federal election law requirements regarding delegate committees, the impetus for establishing the Committee was Pennsylvania's new dual primary system. Contrary to Hart's allegations that the Mondale delegate committees were established by MPC "for the very purpose of circumventing the contribution expenditure limitations," (See Hart, April 6 Complaint at p. 7), the existence of the Third District Committee arises from exigencies created by Pennsylvania's new primary system. Because delegates are now directly elected, independent of the percentage of votes captured by the candidates to whom they were pledged, the district's delegate candidates had to conduct their own campaigns in order to assure their election.

8504050084 13

This change was keenly felt in the Third District, where a number of prominent local politicians had supported defunct candidacies and then organized themselves as an uncommitted slate.

II. Contributions and Disbursements

Attached is Exhibit "B", which is a draft statement of receipts and disbursements setting forth all of the Committee's activity. As this report makes clear, the Third District Committee received no contributions from any Mondale delegate committee anywhere in the country. Nor did the Committee make any contributions to any Mondale delegate committee anywhere in the country.

In addition to the local fundraising events which produced most of the individual contributions found in the Committee's report, the Third District Committee received a number of contributions from Political Action Committees (PAC's). Each of these PAC contributions was well under the legal limit of $5,000. Hart's repeated reference to use of PAC money appears to be less a legal issue than political posturing. Receipt of PAC money carries no implications of affiliation with either MPC or with other delegate committees, the gravamen of Hart's charges. To the contrary, MPC expressed its opposition to acceptance of PAC funds by local delegate committees; yet the Third District Committee nevertheless accepted these contributions.

III. Staffing

Most of the Committee's local campaign activities were performed by resident volunteers. In addition, the Committee had the assistance of a number of workers from out of the state. These workers were in no position to control the Committee. Rather, they required considerable instruction in the ways of Philadelphia politics before they were able to function adequately. One Mondale worker who was not able to make the necessary adjustment was let go. These workers performed certain organizational and administrative chores in support of the Committee's activities, and were reimbursed on a per diem basis for food, lodging and travel expenses.

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Insofar as the Committee is aware, none of them were receiving instructions from either PALC or MPC while they were in the Third District.

Many local volunteers actively participated in the Committee's campaign, distributing fliers, organizing and attending rallies, and getting out the vote on Election Day. The campaign was a grass roots, independent venture directed solely at the election of delegates for the Third District. There was no affiliation or coordination with MPC at any stage of the campaign, contrary to Hart's charges.

IV. Conclusion

Based on the foregoing information, the Commission should find that the Third District Committee did not violate the Federal Election Campaign Act.

Respectfully Submitted,

Matthew Kent Perks, Esquire
Attorney I.D. #37791
1521 Walnut Street
Philadelphia, PA 19102
(215) 564-4266

8504050084 5

1521 Walnut Street
Philadelphia, PA 19102

5 0 4 0 3 5 0 0 9 8 4 6



Stephen Hime, Esquire
General Counsel's Office
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

CERTIFIED
P 628 235 538
MAIL

Certified Mail - Return Receipt Requested

RECEIVED AT THE FEC
HAND DELIVERED
84 MAY 25 A 9:57

PEPPER, HAMILTON & SCHEETZ

ATTORNEYS AT LAW

1777 F STREET, N.W.
WASHINGTON, D.C. 20006
202-842-0100

10 SOUTH MARKET SQUARE
HARRISBURG, PA 17108
717-255-1155

100 RENAISSANCE CENTER
DETROIT, MI 48243
313-259-7110

20TH FLOOR
THE FIDELITY BUILDING
123 SOUTH BROAD STREET
PHILADELPHIA, PENNSYLVANIA 19109
215-563-2000
CABLE ADDRESS "PEPFIL PHILADELPHIA"
TELECOPIER (#400) 215-735-6000 · (#200) 215-568-8864
DEX (#4100) 215-545-3477 · TWX 710-670-0777

600 SOUTH COVE STREET
LOS ANGELES, CA 90014
213-617-0151

512 HAMILTON STREET
ALLENTOWN, PA 18101
215-434-0104

245 CORPORATE PARK DRIVE
WHITE PLAINS, NY 10604
914-694-4500

WRITER'S DIRECT DIAL NUMBER

(215) 893-3000

mims

May 24, 1984

VIA FEDERAL EXPRESS

Stephen Mims, Esquire
General Counsel's Office
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: Americans with Hart, Inc. v. Mondale for President Committee, Inc., MUR 1667

Dear Mr. Mims:

Jim Beck and I have been approached by several Mondale district delegate committees in Pennsylvania and have been asked to represent them now that they have been served in the above-captioned matter. In addition to these committees mentioned in Jim's letters of May 18, we have received materials from three more such committees, the Third, Twelfth, and Nineteenth District Delegates for Mondale. We may receive materials from a number of others. Enclosed is a statement of designation of counsel for the Nineteenth District committee.

We do not know how many of these committees our firm will eventually represent, nor do we have any idea how long it will take for the necessary materials to reach us. Your mailings to the district committees appear to have been received on May 14 or 15, thereby making responses due on May 29 or 30.

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While we appreciate the Commission's general view regarding extensions, we believe that an extension, until June 15, for the responses of the Pennsylvania district delegate committees is warranted. In light of the peripheral involvement of the district committees in this matter, grant of the requested extension would not hinder the Commission's deliberations. This extension would allow us to ensure that any charges against the district delegate committees are responded to in a complete and orderly fashion even as to latecomers.

Thank you for your consideration of this request. Please advise me as soon as possible of the Commission decision.

Yours truly,

Susan M. Harrison

Susan M. Harrison

SMH/lk

Enclosure

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84 MAY 25 A 8:57

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1667

NAME OF COUNSEL: Jim Beck and/or Peter Hearn of Pepper, Hamilton, & Sheetz

ADDRESS: 2001 Fidelity Building
123 South Broad Street
Philadelphia, PA 19109

TELEPHONE: (215) 893-3995

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 15, 1984
Date

Louann Shrader
Signature

RESPONDENT'S NAME: Louann Shrader

ADDRESS: R.D. 5 Box 259 Oakhill Drive
Hanover, PA 17331

HOME PHONE: (717) 632-6023

BUSINESS PHONE: (717) 860-4146

-RECEIVED MAY 21 1984

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84 MAY 25 A8:57

PEPPER, HAMILTON & SCHEETZ
20TH FLOOR
THE FIDELITY BUILDING
123 SOUTH BROAD STREET
PHILADELPHIA, PA. 19109

Stephen Mims, Esquire
General Counsel's Office
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

VIA FEDERAL EXPRESS

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Alice K. Gardan, Treasurer
3rd CD Delegates for Mondale
2707 Tolbut Street
Philadelphia, PA 19152

Re: MUR 1667

Dear Ms. Gardan:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

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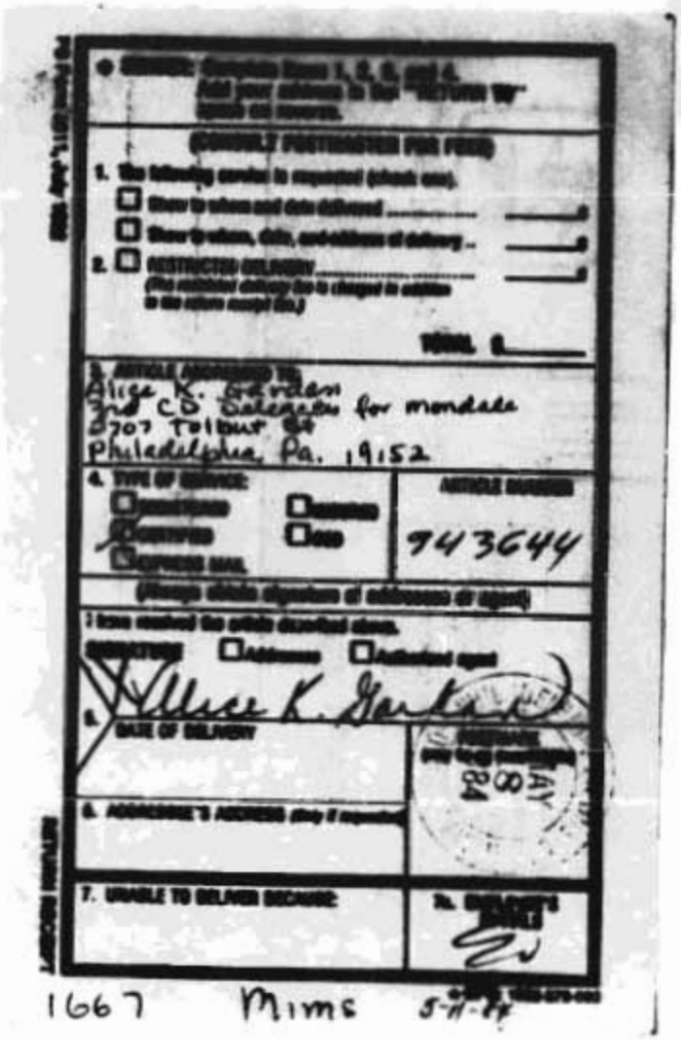
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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



8 5 7 4 0 5 0 0 8 5 7

MONDALE DELEGATES COMMITTEE
422 Douglass Street
Reading, PA 19601

RECEIVED AT THE FEC
OGC #4668
84 SEP 13 A8:

September 11, 1984

DELEGATES:
Alan J. Dorion
Dorothea L. Schaeffer
Mary H. Schmidt
Peter J. Svoboda

ALTERNATES:
Harry S. Lesher
Marjorie Reppert

CHAIRPERSON:
Pat Holt 378-1864

TREASURER:
Larry Murin 372-8788

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

RECEIVED
OFFICE OF THE
GENERAL COUNSEL
'84 SEP 13 P12:

RE: MUR 1704 and 1667

Dear Mr. Gross:

Some time ago, I was advised by the Federal Elections Commission that due to our continued involvement in the above referenced complaints the Mondale Delegates Committee may not file a closing report.

Please be advised that all of our activities ceased immediately following the April primary. I have not filed a quarterly report since then nor have I filed a closing report.

I would appreciate if you would advise me what if any obligations remain for me until this matter is finally resolved.

Very truly,

Lawrence P. Murin

Lawrence P. Murin
Treasurer

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Paid for by the Mondale Delegates Committee

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READING, PA
PM
11 SEP
1984

ALWAYS USE ZIP CODE

84 SEP 13

USA 20¢

L. Murin
422 Douglass Street
Reading, PA 19601

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

RECEIVED AT THE FEC
84 JUN 18 A8:55
84 JUN 18 A10:47

MUR 1647

June 13, 1984

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

Dear Mr. Gross:

You are in receipt of our designation of counsel form. That form shows Attorney LeRoy Levan as our counsel.

Please be advised that Attorney Levan is our local counsel but that Attorney James Beck is also our representative and authorized to act on our behalf.

Very truly,

Larry P. Murin

Larry P. Murin

cc: James Beck

8504050085 5

Larry P. Murin
422 Douglass Street
Reading, PA 19601

Mr. Kenneth Gross, Assocaite General Counsel
Federal Elections Commission
Washington, D.C. 20463

8504050085

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84 MAY 1 AM 10:54

MUR #1667

PEPPER, HAMILTON & SCHEETZ

ATTORNEYS AT LAW

1777 F STREET, N.W.
WASHINGTON, D.C. 20006
202-872-0100

10 SOUTH MARKET SQUARE
HARRISBURG, PA 17108
717-255-1155

100 RENAISSANCE CENTER
DETROIT, MI 48243
313-259-7110

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THE FIDELITY BUILDING
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PHILADELPHIA, PENNSYLVANIA 19109
(215) 893-3000
CABLE ADDRESS "PEPHAM PHILADELPHIA"
TELECOPIER (215) 735-6024 • (MCI) 210-384-7814
TELEX (89100) 215-546-3477 • TWX 710-670-0777

600 SOUTH OLIVE STREET
LOS ANGELES, CA 90014
213-617-0481

510 HAMILTON STREET
ALLENTOWN, PA 18101
215-434-0104

SIX CORPORATE PARK DRIVE
WHITE PLAINS, NY 10604
914-694-4600

(215) 893-3000

May 29, 1984

Stephen Mims
General Counsel's Office
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: Americans with Hart, Inc. v. Mondale
for President Committee, Inc., MUR 1667

Dear Mr. Mims:

This letter serves as the response of the Mondale Delegates Committee of Reading, Pennsylvania ("MDCR" or "Reading Committee") to the general allegations contained in the amended complaint filed with the Federal Election Commission ("FEC") by complainant Americans with Hart, Inc. ("Hart") against respondent Mondale for President Committee, Inc. ("MPC" or "Mondale campaign"). MDCR knows nothing firsthand about the activities of MPC, Mondale delegate committees in other states, or other Mondale district delegate committees in Pennsylvania. As a result, this submission will respond only to those charges alleging that certain of MDCR's actions were either illegal or created an affiliation between the Reading Committee and MPC.

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Before addressing these allegations, it is necessary to describe the political and legal backdrop against which the Reading Committee operated. The 1984 procedure for delegate selection in Pennsylvania differed sharply from procedures used in previous elections. In 1980, delegates were apportioned more or less in accordance with the popular vote received by the candidates in each congressional district. The 1984 procedure, however, called for the direct election of delegates. There is therefore no theoretical correlation between the success of presidential candidate Walter Mondale and the success of Mondale delegates. A Mondale delegate who relied solely on the appeal of Walter Mondale, then, could not necessarily be assured of election. Under this new dual system, many of the delegate candidates certainly would have organized something in the nature of delegate committees without any encouragement from the Mondale campaign.

In considering the Hart allegations regarding the Reading Committee, the nature of the delegate selection procedures serves as a necessary reference point.

I. Formation

The Reading Committee was created after local Mondale supporters, including two delegate candidates, were contacted in late February by a labor official. The Mondale supporters were

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informed that because of the new Pennsylvania delegate selection procedures, the Mondale campaign would not be devoting any resources to aid the election of individual delegates. It was therefore the responsibility of the delegate candidates to organize and finance any and all grass roots activities, including leafletting, the printing and distribution of election literature, rallies, and the like. The allegation that MDCR was being "used" by the Mondale campaign to "take over entire sections" of the campaign, Hart April 18 Submission at 2, 3, has no validity. MPC did not "use" MDCR; on the contrary, the Mondale campaign never assumed any responsibility for these activities. Hart's argument implicitly affirms that the Reading Committee conducted the precise activities prescribed in the FEC's regulations. See 11 C.F.R. §110.13(d)(2)(i).

The Reading Mondale supporters were also advised how to comply with federal regulations, since most were unaware that federal election law even applied. It is not known how many of the Reading supporters were thus contacted.

II. Staffing; Activities

Because direct election of delegates was new to Pennsylvania; because MDCR had few resources to actively recruit volunteers; and because it was necessary to staff MDCR as many days before the April 10th primary as possible, the Reading

8504050085 9

Committee used the help of two experienced Mondale workers from late March until the primary.[1] The nature of the previous affiliation between these volunteers and the Mondale campaign is not known. MPC, in addition, had no power whatsoever over the members of the Reading Committee. See 11 C.F.R. §100.5(g)(2)(ii). Mr. Larry Murin, MDCR's treasurer, and Ms. Pat Hatt, the committee chairperson, had and have no political connection to Mondale's campaign.

Hart cites no MDCR action that was impermissibly influenced by MPC -- because there were none. MDCR alone designed its literature. MDCR did no public advertising of its own, nor did it share any space or time with MPC on any of the latter's advertisements. Election day poll workers were provided by the Reading Democratic City Committee, which provided workers for the Hart campaign as well. The mere prior work history of MDCR staff does not implicate any of the five affiliating factors set out in the federal regulations. See 11 C.F.R. §100.5(g)(2). Even assuming that past employment history was relevant to one of these criteria, such work history is not sufficient to constitute "affiliation" between the Reading Committee and MPC.

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1. Their remuneration consisted of a per diem subsistence allowance. Such payments are not in violation of the election laws.

III. Contributions to MDCR

The Reading Committee received a total of $4,800 in contributions. The Pennsylvania At-large Delegates Committee ("PALC") gave a one-time contribution of $1,000 to the Reading Committee. MDCR did not request that this contribution be made. Nor does the $1,000 amount involved constitute a "substantial portion" of MDCR's funds. See MDCR Report of Receipts and Disbursements (attached as Exhibit "A"). It is also unlikely that $1,000 represents a "substantial portion" of PALC's funds.

The $1,000 PALC contribution suggests nothing about the relationship between MDCR and the Mondale campaign. Such a contribution is not only legal - and Hart does not otherwise contend - but also makes perfect sense when considered in light of the manner in which at-large delegates are selected in Pennsylvania. At-large delegates are apportioned on the basis of pledged delegates elected at the district level. They themselves are not on the ballot. PALC contributed the $1,000 to MDCR in order to help itself by aiding the election of the Reading delegates. The Mondale campaign had nothing to do with this contribution. Hart has alleged nothing to suggest that this $1,000 contribution should constitute a ground for a finding of affiliation under 11 C.P.R. §100.5(g)(2)(ii).

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The Reading Committee also received a total of $3,600 in so-called "PAC money". The Reading Committee ignored the express wishes of the Mondale campaign by accepting this money, and the very fact that such contributions were accepted demonstrates the Reading Committee's independence from MPC. MDCR was well aware of the position of the Mondale campaign on this issue when it accepted the money. Moreover, it is perfectly understandable that the Reading Committee would accept the labor union PAC money since one of the delegates from that district is a labor union representative. See MDCR Itemized Receipts (Exhibit "B"). The payment and acceptance of such money are clearly lawful.

IV. Contributions by MDCR

The Reading Committee made no contributions to the Mondale national campaign, to the state at-large committee, or to other district delegate committees, either within Pennsylvania or in other states. See MDCR Itemized Disbursements (Exhibits "C" and "D").

V. Conclusion

For the reasons set forth in this response, the Commission should find no reason to believe that MDCR has violated the

8504050085?

Federal Election Campaign Act.

Respectfully submitted,

PETER HEARN
JAMES N. BECK
Pepper, Hamilton, and Scheetz
2001 The Fidelity Building
123 South Broad Street
Philadelphia, PA 19109
(215) 893-3000

Attorneys for LAWRENCE P. MURIN, TREASURER, MONDALE DELEGATES COMMITTEE.

8504050085 7

For a Political Committee Other Than an Authorized Committee

(Summary Page)

ALIGN AREA | | ALIGN AREA

1. Name of Committee (In Full)

Friends Diggs-Ez Committee

Address (Number and Street)

422 Douglass St

City, State and ZIP Code

Reading. Pa 19601

☐ Check here if address is different than previously reported.

2. FEC Identification Number

C00178137

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

4. TYPE OF REPORT (Check appropriate boxes)

(a) ☒ April 15 Quarterly Report ☐ October 15 Quarterly Report

☐ July 15 Quarterly Report ☐ January 31 Year End Report

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

☐ Monthly Report for _____

☐ Twelfth day report preceding _____ (Type of Election)

election on _____ in the State of _____

☐ Thirtieth day report following the General Election

on _____ in the State of _____

☐ Termination Report

(b) Is this Report an Amendment?

☐ YES ☐ NO

8504050086 4

SUMMARY	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period Feb 23 1984 through April 12, 1984		
6.(a) Cash on hand January 1, 19 84		$ —
(b) Cash on Hand at Beginning of Reporting Period	$ 00 00	
(c) Total Receipts (from Line 18)	$ 4800.00	$ 4800.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ 4800.00	$ 4800.00
7. Total Disbursements (from Line 28)	$ 393133	$ 393.33
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 868 67	$ 868.67
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)	$ —	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	$ —	

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

Lawrence P. Murin

Type or Print Name of Treasurer

L P Murin

SIGNATURE OF TREASURER

4/12/84

Date

For further information contact:
Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4068

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

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

FEC FORM 3X (3/80)

EXHIBIT "A"

SCHEDULE A **ITEMIZED RECEIPTS**

LINE NUMBER 21A
(Use separate schedule(s) for each category of the Detailed Summary Page)

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

Name of Committee (In Full)

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Peter J. Svoboda 517 W. Laurel St Frackville, Pa.	ACTWUA/AFL-CIO	3/16/84	200
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation Union representative		
	Aggregate Year-to-Date—$ 200		

B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation		
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—$		

C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation		
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—$		

D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation		
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—$		

E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation		
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—$		

F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation		
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—$		

G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation		
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—$		

SUBTOTAL of Receipts This Page (optional) . . . . . EXHIBIT "B"	
TOTAL This Period (last page this line number only)	200

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SCHEDULE B — ITEMIZED DISBURSEMENTS

Page ... of ... for LINE NUMBER 17
(Use separate schedule(s) for each category of the Detailed Summary Page)

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

Name of Committee (In Full)

Mondale Delegates Committee

	Purpose of Disbursement / Disbursement for	Date (month, day, year)	Amount of Each Disbursement This Period
A. Full Name, Mailing Address and ZIP Code AVIS Reading Airport Reading Pa	Purpose of Disbursement: Car rental Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	4/1/84	411.28
B. Full Name, Mailing Address and ZIP Code Steve Roose 3630 Touzalin La Lincoln Neb. 68507	Purpose of Disbursement: Gasoline Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	4/11/84	116.51
C. Full Name, Mailing Address and ZIP Code Brandon Burnette 114 Pine St. Portsmouth N H 03801	Purpose of Disbursement: Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	4/12/84	93.00
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement: Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement: Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement: Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement: Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement: Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement: Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			3[illegible]

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SCHEDULE B

ITEMIZED DISBURSEMENTS

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

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

Name of Committee (in Full)

Mondale Delegates Committee

	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Full Name, Mailing Address and ZIP Code ✓ Steve Raabe 3530 Touzalin Ln Lincoln Neb 68507	Salary Disbursement for: ☒Primary ☐General ☐Other (specify):	3/30/84	189 00
B. Full Name, Mailing Address and ZIP Code Democratic City Committee 928 Walnut St. Reading, Pa.	Polling Disbursement for: ☒Primary ☐General ☐Other (specify):	3/30/84	25 00
C. Full Name, Mailing Address and ZIP Code Americus Club 1556 N. 9th St. Reading. Pa	Fundraiser/Fundraiser Disbursement for: ☒Primary ☐General ☐Other (specify):	4/1/84	81.50
D. Full Name, Mailing Address and ZIP Code Boyertown Publishing Co. 48 S. Reading Ave. Boyertown Pa.	Printing Disbursement for: ☒Primary ☐General ☐Other (specify):	4/1/84	639.29
E. Full Name, Mailing Address and ZIP Code Benke Printing + Envelope Co 47 S 6th St Reading. Pa.	Printing Disbursement for: ☒Primary ☐General ☐Other (specify):	4/7/84	100 70
F. Full Name, Mailing Address and ZIP Code ✓ Steve Raabe See "A"	Gasoline Disbursement for: ☒Primary ☐General ☐Other (specify):	4/8/84	112.70
G. Full Name, Mailing Address and ZIP Code Creative Printing 317 Center St Ashland. Pa	Printing Disbursement for: ☒Primary ☐General ☐Other (specify):	4/13/84	221 84
H. Full Name, Mailing Address and ZIP Code ✓ Kenan Shapiro 842 Commonwealth Ave Newton Centre MA	Salary Disbursement for: ☒Primary ☐General ☐Other (specify):	4/10/84	224 00
I. Full Name, Mailing Address and ZIP Code ✓ Steve Raabe See "A"	Salary Disbursement for: ☐Primary ☐General ☐Other (specify):	4/10/84	378 00
SUBTOTAL of Disbursements This Page (optional)			1982.33
TOTAL This Period (last page this line number only)			

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SCHEDULE B

ITEMIZED DISBURSEMENTS

LINE NUMBER 17
(Use separate schedule(s) for each category of the Detailed Summary Page)

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

Name of Committee (in Full)

Mandale Delegates Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Wm. Klein Signs 938 Walnut St Reading, Pa 19601	Printing Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/2/84	371.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Postmaster of Reading 5th and Court Sts. Reading, Pa	Mailing Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/10/84	60.00
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Brandon Burnette 114 Pine St Portsmouth NH 03801	Salary Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/11/84	222.00
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Karen Olick 312 S Carolina SE Washington DC 2003	Salary Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/11/84	206.00
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Jeff Tittel 167 Snake Den Rd Ringwood NJ 07456	Salary Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/1/84	395 00
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Color Tyme TV Rental Antietam Valley Shopping Center 2940 St Lawrence Ave Reading, Pa	TV Rental Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/10/84	15.85
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Merritt Lumber Co. 2nd & Spruce Sts Rdg Pa 19602	Supplies Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/4/84	5.73
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Annens Restaurant 5th & Exeter Sts Reading, Pa	Lunch Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/3/84	40 00
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Acme Markets 6th & Oley Reading Pa	Refreshments Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/1/84	12.93
SUBTOTAL of Disbursements This Page (optional)			1328.51
TOTAL This Period (last page this line number only)			

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SCHEDULE D
(Revised 3/80)

DEBTS AND OBLIGATIONS
Excluding Loans

Page ____ of ____ Pages
LINE NUMBER _____
Also separate schedules for each numbered line)

Name of Committee (in Full)	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
1) SUBTOTALS This Period This Page (optional)				
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)				

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SCHEDULE F

ITEMIZED COORDINATED EXPENDITURES MADE BY POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S) ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE (2 U.S.C. §441a(d))

Page ___ of ___ (for LINE NUMBER ___)

(To be used only by Political Committees in the General Election)

Name of Political Committee (In Full)

Has your Committee been designated to make coordinated expenditures by a political party committee? ☐ YES ☐ NO
If YES, name the designating committee:

Full Name, Mailing Address and ZIP Code of Subordinate Committee:

Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
	Aggregate General Election Expenditure for this Candidate--$			
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
	Aggregate General Election Expenditure for this Candidate--$			
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
	Aggregate General Election Expenditure for this Candidate--$			
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
	Aggregate General Election Expenditure for this Candidate--$			
SUBTOTAL of Expenditures This Page (optional)				
TOTAL This Period (last page this line number only)				

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PEPPER, HAMILTON & SCHEETZ
TWENTIETH FLOOR
THE FIDELITY BUILDING
PHILADELPHIA, PA. 19109

PEPPER, HAMILTON & SCHEETZ
ATTORNEYS AT LAW
2001 FIDELITY BUILDING
123 SOUTH BROAD STREET
PHILADELPHIA, PA. 19109

TO

Stephen Mims, Esquire
General Counsel's Office
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

CERTIFIED
P 308 263 055
MAIL

RECEIVED AT THE FEC
84 JUN 25 P 1:17

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DEX (#2800) 215-546-2477 - TWX 710-670-0777

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213-617-0151

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ALLENTOWN, PA 18101
215-434-0104

511 CORPORATE PARK DRIVE
WHITE PLAINS, NY 10604
914-694-6800

WRITER'S DIRECT DIAL NUMBER

June 21, 1984

Stephen Mims, Esquire
General Counsel's Office
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: The National Right to Work Committee, et al. v. Mondale, et al., MUR 1704

Dear Mr. Mims:

This letter and the supporting exhibits constitute the response of the Second Congressional District Delegates for Mondale Committee ("the Committee") to the factual allegations concerning it which have been made in the Complaint filed with the Federal Election Commission by complainants the National Right to Work Committee, et al. ("RTW") against Mr. Walter F. Mondale and his campaign committee (collectively "Mondale Campaign") and a long list of multi-candidate committees associated with various national unions (collectively "Union PAC's").

To the extent the Complaint alleges that the Committee was affiliated with the Mondale Campaign, such charges were exhaustively refuted by the Committee in its June 21, 1984 submission in Americans With Hart, Inc. v. Mondale for President

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Committee, Inc., MUR 1667, which is attached hereto as Exhibit "A" and incorporated as though set forth in full herein. The Committee does not address the allegations in the Complaint that contributions by the Union PAC's to various Mondale committees somehow affiliate the Union PAC's with each other, because these charges are irrelevant to the Comittee. The Committee is responding solely to refute the allegations concerning it.

The Complaint mentions the Committee in two respects. It notes that Committee literature (Exhibit "B") was available in the headquarters of the Pennsylvania At-Large Delegates for Mondale Committee ("At-Large Committee"). This is perfectly understandable, since the At-Large Committee headquarters was located at 1418 Walnut Street, which is in the Second District. The At-Large Committee is no more affiliated with the Committee than any other organization which allowed Committee literature to be displayed on its premises.

The Chambers Affidavit identifies Wanda Williams, a member of the Committee's staff who received a per diem subsistance allowance while working for the Committee. On occasion, she was permitted to use the At-Large Committee's headquarters as a location at which to meet her volunteers, since the Committee had no office and At-Large Committee office was convenient to public transit. She was probably passing out her campaign literature to her volunteers when she was observed.

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The Commission should find that there is no reason to believe that the Second Congressional District Delegates for Mondale Committee violated the Federal Election Campaign Act.

Respectfully submitted,

PETER HEARN
JAMES M. BECK
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2001 The Fidelity Building
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(215) 893-3000

Attorneys for ANTHONY McNEIL, TREASURER, SECOND CONGRESSIONAL DISTRICT DELEGATES FOR MONDALE COMMITTEE

8504050087 1

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512 HAMILTON STREET
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215-434-0104

SIX CORPORATE PARK DRIVE
WHITE PLAINS, NY 10604
914-694-4000

June 21, 1984

8504050087

Stephen Mims
General Counsel's Office
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: Americans With Hart, Inc. v. Mondale
for President Committee, Inc., MUR 1667

Dear Mr. Mims:

This letter and supporting exhibits serve as the response of the Second Congressional District Delegates for Mondale Committee ("the Committee") to the general allegations contained in the amended complaint filed with the Federal Election Commission ("FEC") by complainant Americans with Hart, Inc. ("Hart") against respondent Mondale for President Committee, Inc. ("MPC or "Mondale campaign"). The Committee knows nothing firsthand about the activities of MPC, Mondale delegate committees in other states, or other Mondale delegate committees in Pennsylvania. As a result, this submission will respond only

EXHIBIT "A"

to those charges alleging that certain of the Committee's actions were either illegal or created an affiliation between the Committee and MPC.

Before addressing these allegations, it is necessary to describe the political and legal environment in which the Committee operated. The 1984 method of delegate selection in Pennsylvania was a dramatic change from procedures used previously. In 1980, delegates were awarded in approximate accordance with the popular vote received by the presidential candidates in each congressional district. The 1984 procedure, however, provided for direct election of delegates. There was, therefore, no necessary correlation between the success of presidential candidate Walter Mondale and the success of his delegates in the Second Congressional District. A Mondale delegate who relied solely on the appeal of Walter Mondale was not assured of election, no matter how well Mr. Mondale did in the district. Under this new system, many delegate candidates would have organized themselves into the equivalent of delegate committees without encouragement from the Mondale campaign.

In considering Hart's allegations regarding the Committee, the fact of this dual system of delegate selection serves as a necessary reference point.

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I. Formation

The Committee was organized after a number of the delegate candidates were informed in mid-February that if there was to be a grassroots campaign in the Second District, they would have to organize it themselves. Having already received some material from MPC on delegate committees, see Exhibit "A", one of the delegate candidates contacted a local attorney. The attorney met with the delegate candidates on February 17 and explained the benefits and responsibilities of forming such a committee. The delegate candidates than debated the issue among themselves and made the decision to form the Committee.

The allegation that the Committee was being "used" by MPC to "take over entire sections" of the campaign, Hart April 18 Submission at 2, 3, is disingenuous. MPC did not "use" the Committee; on the contrary, MPC never assumed any responsibility for the type of activities undertaken by the Committee. The Second District delegate candidates simply responded to the reality which confronted them. Moreover, Hart's argument implicitly acknowledges that the Committee engaged in the precise activities authorized by the FEC's regulations. See 11 C.F.R. §110.13(d)(2)(i).

The Committee used the information provided by MPC as a guide to compliance with federal regulations. However, when

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questions arose, the Committee relied upon the advice of counsel, not advice from MPC.

II. Staffing; Activities

Because direct election of delegates was an unfamiliar procedure; because the Committee had few resources to spend on recruitment; and because it was necessary to get underway as soon as possible before the April 10th primary, the Committee used, in addition to local volunteers, the help of a several experienced Mondale volunteers.[1] The nature of any previous connection between these volunteers and the Mondale campaign is not known. MPC could not and did not exercise the authority specified in 11 C.F.R. §100.5(g)(2)(ii) with respect to the Committee because members of the Committee were in no way beholden to MPC. Moreover, Mr. Anthony McNeil, the Committee's treasurer, was chosen solely by the Committee and has no connection to Mondale's campaign.

Hart cites no Committee action that was impermissibly influenced by MPC -- because there were none. The Committee designed its own literature. See Exhibit "B". The Committee undertook no public advertising, nor did it share any space or time with MPC on any of MPC's advertisements. Speculation

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1. These volunteers received per diem subsistence allowances. Such payments are not in violation of the election law.

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regarding the prior work history of some of the Committee's staff does not implicate any of the five affiliating factors set out in the federal regulations. See 11 C.F.R. §100.5(g)(2). Even if past employment history were relevant to one of these criteria, such work history is not sufficient to constitute "affiliation" between the Committee and MPC.

III. Contributions to the Committee

The Committee received a total of $3,210 in contributions. The Pennsylvania At-Large Delegates Committee ("PALC") gave a one-time contribution of $1,000 to the Committee. The Committee did not solicit this contribution, which was initially refused on advice of counsel because the check lacked of proper identification. Nor does the $1,000 amount constitute a "substantial portion" of the Committee's funds. See Contribution List (attached as Exhibit "C"). It is also unlikely, in view of Hart's allegations, that $1,000 represents a "substantial portion" of PALC's funds.

The $1,000 PALC contribution suggests nothing about the relationship between the Committee and the Mondale campaign. The contribution was not only legal - and Hart does not otherwise contend - but also makes perfect sense because at-large delegates are apportioned on the basis of pledged delegates elected at the district level. PALC contributed the $1,000 to the Committee in

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order to help itself by aiding the election of the pledged Mondale delegates in the Second Congressional District. The Mondale campaign had nothing to do with this contribution. Hart has alleged nothing to suggest that this $1,000 contribution should constitute a ground for a finding of affiliation under 11 C.F.R. §100.5(g)(2)(ii).

The Committee also received two contributions totalling $1,500 from so-called "PAC's". The Committee ignored the express wishes of the Mondale campaign by accepting this money, and this very fact demonstrates the Committee's independence from MPC. The Committee knew of the position of the Mondale campaign on this issue when it accepted the money. Moreover, it is perfectly understandable that the Committee would accept the labor union PAC money since one of the delegate candidates is a labor union representative. The payment and acceptance of such money are clearly lawful.

IV. Contributions by the Committee

The Committee made no contributions to the Mondale national campaign, to the state at-large committee, or to other delegate committees, either within Pennsylvania or in other states. See Disbursements List (Exhibit "D").

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V. Conclusion

For the reasons set forth in this response, the Commission should find no reason to believe that the Second Congressional District Delegates for Mondale Committee violated the Federal Election Campaign Act.

Respectfully submitted,

PETER HEARN
JAMES M. BECK
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2001 The Fidelity Building
123 South Broad Street
Philadelphia, PA 19109
(215) 893-3000

Attorneys for ANTHONY MCNEIL, TREASURER, SECOND CONGRESSIONAL DISTRICT DELEGATES FOR MONDALE COMMITTEE

8 5 0 4 0 5 0 0 8 8 1

Mondale for President
2301 Wisconsin Avenue, N.W.
Washington, D.C. 20007
Telephone: 202-625-1600

MONDALE

TO: MONDALE DELEGATES

FROM: ELAINE KAMARCK

DATE: JANUARY 12, 1984

RE: CONDUCTING YOUR CAMPAIGN FOR DELEGATE TO THE NATIONAL CONVENTION

Under the federal election laws, persons seeking election as delegates or alternates to the National Convention can form committees which are allowed to raise and expend money to support their candidacies. Care must be taken to assure that the enclosed legal guidelines are followed. This program can be of enormous benefit in assuring your election as a delegate. Following is a brief outline on how these committees should work.

I. Forming the Committee

Immediately upon being slated as a Mondale delegate, the campaign will assist each slate of delegates in forming a committee if they so desire. A memorandum explaining the legal procedures for forming a committee and registering and reporting to the FEC accompany this memo.

II. Raising Money

As soon as possible, the delegate committees should develop a fundraising plan which contains the following components:

1. Plan one or more grass roots fundraisers in your Congressional District

2. Solicit other Mondale supporters in your district for contributions to the Committee. (IMPORTANT NOTE: A person who has contributed the maximum amount to the Mondale campaign is allowed to make a contribution of up to $5,000 per person to each Mondale delegate committee subject only to the annual $25,000 limit per individual on contributions to all federal candidates.)

3. Solicit local organizations to which you may belong for contributions. (IMPORTANT NOTE: Contributions by corporations, labor unions, foreign nationals and federal contractors are not permitted. But

EXHIBIT "A"

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Mondale for President
2301 Wisconsin Avenue, N.W.
Washington, D.C. 20007
Telephone: 202-625-1600

MONDALE

contributions from Political Action Committees of issue groups or labor unions are permitted. Individuals and Political Action Committees can contribute up to five thousand dollars to a delegate committee. Walter Mondale has made a decision not to accept money from P.A.C.'s for his campaign. Each delegate committee may make their own decision regarding P.A.C. money.)

III. Spending Money

The money raised by Delegate Committees must be spent in the district on the conduct of a grassroots campaign. Under no circumstances can money be spent for general public advertising such as T.V., radio, newspaper ads, billboards or direct mail.

Money can be spent for campaign materials to be used by volunteers such as bumper stickers, handbills, brochures, posters and yard signs which advocate the selection of a group of delegates. These materials may include information about the Mondale candidacy as well as information about the delegate candidates. There are no requirements as to the the amount of space which must be devoted to the delegate-candidates versus the amount of space devoted to Mondale, provided the purpose and message are directed towards the selection of the delegate candidates.

Before spending any money:

- Design your campaign materials.
- Arrange for a volunteer group to distribute materials.
- Plan a "Get Out the Vote" program using volunteers. (IMPORTANT NOTE: Delegate Committees can reimburse volunteers for their expenses.)

IV. Reporting

You will have to file quarterly reports with the Federal Election Commission. Therefore be sure to:

- Keep careful records of all receipts and expenditures.
- Write checks whenever possible for all expenditures so that record keeping is easier.
- Please follow the instructions on the enclosed memorandum and when in doubt do not hesitate to call the Office of the Legal Counsel here at the campaign headquarters.

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MEMORANDUM

January 6, 1984

RE: Delegate Expenditure Committees

FROM: David Ifshin
Lyn Oliphant

FORMING A DELEGATE COMMITTEE

Under federal election law, if a group of delegates plans to raise or spend in excess of $1000 on behalf of the delegate slate, it must form a delegate committee. This committee must file two types of forms containing routine information with the Federal Election Commission: a Statement of Organization (Form 1) and a Report of Receipts and Expenditures (Form 3X). Copies of these forms are attached. Additional forms may be obtained from the legal office at the national headquarters.

The first step for a delegate committee is to designate a treasurer and to open a separate committee bank account.

Within 10 days of the time when your delegate committee raises contributions totalling in excess of $1000 or spends more than $1000, the treasurer must file a Statement of Organization with the FEC (Form 1).

HOW TO FILL OUT A STATEMENT OF ORGANIZATION

A Statement of Organization is a simple form designed to provide the FEC with basic information about political committees. Complete instructions are on the back of the form. In order to prepare a Statement for a delegate committee, the following should be kept in mind.

Line 1: Your committee's name is inserted on line 1. Under the

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law, the name of your committee must include the word "delegate(s)," and may include the name of the presidential candidate which it supports. For example, "XYZ Delegate Committee" or "XYZ Delegates for Mondale."

Line 2: This line requests the date when your group became a political committee. The date may be anytime prior to 10 days before the committee receives or expends its first $1000.

Line 3: If your committee is registering for the first time, you need not fill in this blank.

Line 4: If your committee is registering for the first time, you should check "NO."

Line 5: Delegate committees should check "(c)" and fill in the name of Walter F. Mondale.

Line 6: FILL in "NONE."

Line 7: This line requests the name of the person who will keep the records and books of your committee. If this is the treasurer, you may simply fill in "Treasurer."

Line 8: This line requests the name and address of the treasurer and assistant treasurer, if any. Your committee must have a treasurer, but need not have an assistant treasurer. The treasurer and assistant treasurer may, but are not required to be, candidates for delegate.

Line 9: Your committee funds must be kept in a separate checking account which contains only committee funds. This line requests the name and address of the bank in which the committee has its account. If for any reason a second account is needed or the funds are to be kept anywhere other than a bank, please consult with your state coordinator. Under the law, each committee makes

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all its disbursements by check drawn on the committee's account, except for expenditures of less than $100 made from a petty cash fund. If a petty cash fund is established, records must be kept of all disbursements from it.

Once the Statement of Organization has been completed, the treasurer must sign and date it. It should then be sent to the Federal Election Commission, 1325 K Street, N.W., Washington, D.C. 20463. A copy must also be filed with the Secretary of State in your state. Any changes in the information reported on the Form must be reported to the FEC in writing within 10 days of the date of the change. Please send a copy of the Statement of Organization and all other filings of the committee with the FEC to the national headquarters, attention General Counsel's office.

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REPORTING REQUIREMENTS FOR RECEIPTS AND DISBURSEMENTS (Form 3X)

The Report of Receipts and Disbursements is a means of providing public disclosure of the financial activity of political committees. Complete instructions for periodic reporting of your financial activity are contained on the attached Report of Receipts and Disbursements (Form 3X). When completed, these reports should be forwarded to the Federal Election Commission, 1325 K Street, N.W., Washington, D.C. 20463. (A copy of the portion of the report applicable to activity in connection with a candidate's election in a state must also be filed with the Secretary of State in that state.) Please send a copy of all reports to the national headquarters, attention General Counsel's Office.

I. Quarterly Reports

Under the law, delegate committees must file quarterly Reports of Receipts and Disbursements (Form 3X) no later than April 15, July 15, October 15, and January 31 of next year. Each report must itemize the funds the committee has raised and expended during the period since the filing of the previous report.

II. Pre-election Reports

In addition to the quarterly reports, a preelection report is filed no later than the 12th day before a primary election in connection with which your committee makes contributions or expenditures. Such reports must include all transactions from the closing date of the last quarterly report filed, through the 20th day before the election. The Commission publishes lists of filing dates which are forwarded to all registered committees.

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That information will also be available through the legal office at the national headquarters.

III. Contents of Reports - Receipts

The FEC forms divide receipts into eight categories for the purpose of reporting. These are:

Contributions from Individuals/Persons
Contributions from Political Committees
Transfers from Affiliated Committees
Loans Received
Loan Repayments Received
Offsets to Operating Expenditures
Contribution Refunds Received from Candidates and Committees
Other Receipts

Total receipts in these categories are reported on the Detailed Summary Page.

In addition, certain receipts are itemized on a separate Schedule A, (e.g. contributions from individuals/persons in excess of $200 or aggregating in excess of $200 during a calendar year). The instructions for Form 3X indicate those receipts which must be itemized on Schedule A. A separate Schedule A must be used for each category of receipt.

IV. Contents of Reports - Disbursements

Similarly, the FEC forms divide disbursements into eight categories for the purpose of reporting. These are:

Operating Expenditures
Transfers to Affiliated Committees
Contributions to Federal Candidates and Political Committees
Independent Expenditures
Loan Repayments Made
Loans Made
Contribution Refunds Made
Other Disbursements

Total disbursements in these categories are reported on the

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In addition, some disbursements must be itemized on a separate Schedule B. Three categories (operating expenditures, independent expenditures, and other disbursements) must be itemized on Schedule B only if they exceed $200 or when added to other disbursements made to the same person, aggregate over $200 during a calendar year. Disbursements under the other categories must be itemized on Schedule B regardless of amount. A separate Schedule B must be used for each category of disbursement.

v. Additional Schedules for Receipts and Expenditures

Certain kinds of receipts and expenditures must also be listed on specific schedules in addition to the general Schedules A and B. These are: loans owed by and to the committee (Schedule C); other debts and obligations (Schedule D); and independent expenditures (Schedule E).

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RECORDKEEPING REQUIREMENTS

Federal election law requires your committee to keep records of all receipts and disbursements. The treasurer has the responsibility to exercise best efforts to obtain and maintain these records.

There is no specific recordkeeping or accounting system required by the law. However, it is recommended that a committee keep a separate account for each of the various categories of receipts and disbursements on the Detailed Summary Page. This will assist you in filling out the Detailed Summary Page as well as Schedules A-E, as necessary.

For contributions received in the form of a check, it is recommended that photocopies of the checks be made and kept by

the committee's treasurer.

All disbursements must be made by check or similar draft from a committee depository, except petty cash expenditures of $100 or less. A written journal of disbursements from petty cash must be maintained.

The Committee treasurer must preserve all records for 3 years after the filing date of the report corresponding to the records.

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Official
MONDALE
Delegate's Ballot

On Tuesday, April 10th Elect

THE SECOND CONGESSIONAL DISTRICT

Mondale Delegates

DELEGATE TO NATIONAL CONVENTION

139 Blondell REYNOLDS
153 Rosalee GEORGE
157 Matthew DAVIS
163 Fred LUKE
164 Patricia J. KALPIK
174 Doris A. SMITH
178 Herman WOODEN
184 Ann J. LAND
185 Arnold C. STORR

ALTERNATE DELEGATE

195 Dennis C. WHITE
197 Jeffrey D. MORAK
199 Leslie B. KERNODLE

8 5 0 4 0 5 0 0 8 9 1

EXHIBIT "B"

CONTRIBUTIONS

NAME	ADDRESS		AMOUNT
Mitchell, Thomasina	3607 W Westmoreland	Phila. 19139	20.00
George, Rosalee	1939 Poplar St.	Phila 19130	25.00
Halpin, Patricia	3200 W Penn St	" 19120	25.00
Tarsley, Levi	1220 N Broad St	" 19121	100.00
Rodner, Michele	1610 Yorks St	" 19150	100.00
Dawson, Barbara	8128 Angela Pl.	" 19153	25.00
Ford, Phyllis	5867 Upland Way	" 19131	20.00
Stovall, Sandra	408 N Salford St	" 19151	15.00
Jones, Frances	3601 Conshohocken St	" 19131	10.00
Ruby Benson	616 E Phila Ellen St	" 19103	25.00
Johnson, William	5007 Reno St.	" 19139	25.00
Hogans Len	21st Clayton St	"	200.00
Beck Jim	122 S Broad St	" 191	100.00
Gilla, Joanne			1000.00
Doyle, Sonny			200.00
	CONTRIBUTIONS FROM PAC		1710.00
*AFSCME			1000.00
*American Federation Teachers			500.00
			1600.00
		TOTAL	3210.00

EXHIBIT "C"

8504050089

REPORTING PERIOD - Pre Primary 2-26-87 3-14-87

TOTAL RECEIPTS		1,500
TOTAL DISBURSEMENT		500
CASH ON HAND END REPORT	1,100	
EXPENDITURES		
CAR RENTAL		200
PER DIEM		300
TOTAL		500

EXHIBIT "D"

8504005008973

ENDING REPORT 3-09-84 to 4-27-84

TOTAL RECEIPTS 3,210

TOTAL DISBURSEMENT 2,295.32

EXPENDITURES

PRINTING	540.60
PER DIEM	1,345.21
Fund RAISER	400.00
BAIL SERVICE CHARGE	9.51
TOTAL	2,295.32

TOTALS FROM BOTH PERIOD

RECEIPTS	3210
EXPENDITURES	2,795.32
BAL.	414.68

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Official
MONDALE
Delegate's Ballot

On Tuesday, April 10th Elect

THE SECOND CONGESSIONAL DISTRICT

Mondale Delegates

DELEGATE TO NATIONAL CONVENTION

139 Blondell REYNOLDS
153 Rosalee GEORGE
157 Matthew DAVIS
163 Fred LUKE
164 Patricia J. HALPIN
174 Doris A. SMITH
178 Herman WOODEN
184 Ann J. LAND
185 Arnold C. STORR

ALTERNATE DELEGATE

195 Dennis C. WHITE
197 Jeffrey D. MORAN
198 Leslie E. KERNODLE

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EXHIBIT "B"

RECEIVED BY THE FEC
Gen # 3815
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PEPPER, HAMILTON & SCHEETZ

ATTORNEYS AT LAW

1777 F STREET, N.W.
WASHINGTON, D.C. 20006
202-842-0100

10 SOUTH MARKET SQUARE
HARRISBURG, PA 17108
717-255-1155

100 RENAISSANCE CENTER
DETROIT, MI 48243
313-259-7110

30TH FLOOR
THE FIDELITY BUILDING
123 SOUTH BROAD STREET
PHILADELPHIA, PENNSYLVANIA 19109-1099
215-560-2000
CABLE ADDRESS "PEPHIL PHILADELPHIA"
TELECOPIER (#465) 215-732-6868 (#96800) 215-568-0804
TELEX (#3800) 215-848-2477 • TWX 710-670-0777

600 SOUTH OLIVE STREET
LOS ANGELES, CA 90014
213-617-0151

340 HAMILTON STREET
ALLENTOWN, PA 18101
215-434-0104

SIX CORPORATE PARK DRIVE
WHITE PLAINS, NY 10604
914-694-4000

WRITER'S DIRECT DIAL NUMBER
(215) 893-3995

June 22, 1984

84 JUN 22 AM 10:20

Stephen Mims, Esquire
General Counsel's Office
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: The National Right to Work Committee, et al. v. Mondale, et al., MUR 1704

Dear Mr. Mims:

I am enclosing under separate cover the responses of the Pennsylvania At-Large Delegates for Mondale Committee and the Second Congressional District Delegates for Mondale Committee to the Complaint in the above-captioned action. As the Complaint is almost wholly irrelevant to the other committees that I represent or advise, with the sole exception of the Seventh Congressional District Mondale Delegates, I will not file or advise any response on behalf of these other committees (Third, Fourth, Sixth, Eighth, Twelfth, Seventeenth and Nineteenth). I do expect that local counsel for the Seventh will take my advice and file a response.

Yours truly,

James H. Beck

JMB/bch

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PEPPER, HAMILTON & SCHEETZ
ATTORNEYS AT LAW

1777 F STREET, N.W.
WASHINGTON, D.C. 20006
202-842-8100

10 SOUTH MARKET SQUARE
HARRISBURG, PA 17108
717-255-1155

100 RENAISSANCE CENTER
DETROIT, MI 48243
313-259-7110

WRITER'S DIRECT DIAL NUMBER

30th FLOOR
THE FIDELITY BUILDING
123 SOUTH BROAD STREET
PHILADELPHIA, PENNSYLVANIA 19109-1099
215-563-2000
CABLE ADDRESS "PEPHIL PHILADELPHIA"
TELECOPIER (#486) 215-735-6039 · (#3800) 215-568-8864
TELEX (#3800) 215-546-3477 · TWX 710-670-0777

600 SOUTH OLIVE STREET
LOS ANGELES, CA 90014
213-617-8151

840 HAMILTON STREET
ALLENTOWN, PA 18101
215-434-8104

SIX CORPORATE PARK DRIVE
WHITE PLAINS, NY 10604
914-694-4800

June 21, 1984

8504050089 97

Stephen Mims
General Counsel's Office
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: Americans With Hart, Inc. v. Mondale for President Committee, Inc., MUR 1667

Dear Mr. Mims:

This letter and supporting exhibits serve as the response of the Second Congressional District Delegates for Mondale Committee ("the Committee") to the general allegations contained in the amended complaint filed with the Federal Election Commission ("FEC") by complainant Americans with Hart, Inc. ("Hart") against respondent Mondale for President Committee, Inc. ("MPC or "Mondale campaign"). The Committee knows nothing firsthand about the activities of MPC, Mondale delegate committees in other states, or other Mondale delegate committees in Pennsylvania. As a result, this submission will respond only

to those charges alleging that certain of the Committee's actions were either illegal or created an affiliation between the Committee and MPC.

Before addressing these allegations, it is necessary to describe the political and legal environment in which the Committee operated. The 1984 method of delegate selection in Pennsylvania was a dramatic change from procedures used previously. In 1980, delegates were awarded in approximate accordance with the popular vote received by the presidential candidates in each congressional district. The 1984 procedure, however, provided for <u>direct</u> election of delegates. There was, therefore, no necessary correlation between the success of presidential candidate Walter Mondale and the success of his delegates in the Second Congressional District. A Mondale delegate who relied solely on the appeal of Walter Mondale was not assured of election, no matter how well Mr. Mondale did in the district. Under this new system, many delegate candidates would have organized themselves into the equivalent of delegate committees without encouragement from the Mondale campaign.

In considering Hart's allegations regarding the Committee, the fact of this dual system of delegate selection serves as a necessary reference point.

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I. Formation

The Committee was organized after a number of the delegate candidates were informed in mid-February that if there was to be a grassroots campaign in the Second District, they would have to organize it themselves. Having already received some material from MPC on delegate committees, see Exhibit "A", one of the delegate candidates contacted a local attorney. The attorney met with the delegate candidates on February 17 and explained the benefits and responsibilities of forming such a committee. The delegate candidates than debated the issue among themselves and made the decision to form the Committee.

The allegation that the Committee was being "used" by MPC to "take over entire sections" of the campaign, Hart April 18 Submission at 2, 3, is disingenuous. MPC did not "use" the Committee; on the contrary, MPC never assumed any responsibility for the type of activities undertaken by the Committee. The Second District delegate candidates simply responded to the reality which confronted them. Moreover, Hart's argument implicitly acknowledges that the Committee engaged in the precise activities authorized by the FEC's regulations. See 11 C.F.R. §110.13(d)(2)(i).

The Committee used the information provided by MPC as a guide to compliance with federal regulations. However, when

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questions arose, the Committee relied upon the advice of counsel, not advice from MPC.

II. Staffing; Activities

Because direct election of delegates was an unfamiliar procedure; because the Committee had few resources to spend on recruitment; and because it was necessary to get underway as soon as possible before the April 10th primary, the Committee used, in addition to local volunteers, the help of a several experienced Mondale volunteers.[1] The nature of any previous connection between these volunteers and the Mondale campaign is not known. MPC could not and did not exercise the authority specified in 11 C.F.R. §100.5(g)(2)(ii) with respect to the Committee because members of the Committee were in no way beholden to MPC. Moreover, Mr. Anthony McNeil, the Committee's treasurer, was chosen solely by the Committee and has no connection to Mondale's campaign.

Hart cites no Committee action that was impermissibly influenced by MPC -- because there were none. The Committee designed its own literature. See Exhibit "B". The Committee undertook no public advertising, nor did it share any space or time with MPC on any of MPC's advertisements. Speculation

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1. These volunteers received per diem subsistence allowances. Such payments are not in violation of the election law.

regarding the prior work history of some of the Committee's staff does not implicate any of the five affiliating factors set out in the federal regulations. See 11 C.F.R. §100.5(g)(2). Even if past employment history were relevant to one of these criteria, such work history is not sufficient to constitute "affiliation" between the Committee and MPC.

III. Contributions to the Committee

The Committee received a total of $3,210 in contributions. The Pennsylvania At-Large Delegates Committee ("PALC") gave a one-time contribution of $1,000 to the Committee. The Committee did not solicit this contribution, which was initially refused on advice of counsel because the check lacked of proper identification. Nor does the $1,000 amount constitute a "substantial portion" of the Committee's funds. See Contribution List (attached as Exhibit "C"). It is also unlikely, in view of Hart's allegations, that $1,000 represents a "substantial portion" of PALC's funds.

The $1,000 PALC contribution suggests nothing about the relationship between the Committee and the Mondale campaign. The contribution was not only legal - and Hart does not otherwise contend - but also makes perfect sense because at-large delegates are apportioned on the basis of pledged delegates elected at the district level. PALC contributed the $1,000 to the Committee in

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order to help itself by aiding the election of the pledged Mondale delegates in the Second Congressional District. The Mondale campaign had nothing to do with this contribution. Hart has alleged nothing to suggest that this $1,000 contribution should constitute a ground for a finding of affiliation under 11 C.F.R. §100.5(g)(2)(ii).

The Committee also received two contributions totalling $1,500 from so-called "PAC's". The Committee ignored the express wishes of the Mondale campaign by accepting this money, and this very fact demonstrates the Committee's independence from MPC. The Committee knew of the position of the Mondale campaign on this issue when it accepted the money. Moreover, it is perfectly understandable that the Committee would accept the labor union PAC money since one of the delegate candidates is a labor union representative. The payment and acceptance of such money are clearly lawful.

IV. Contributions by the Committee

The Committee made no contributions to the Mondale national campaign, to the state at-large committee, or to other delegate committees, either within Pennsylvania or in other states. See Disbursements List (Exhibit "D").

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V. Conclusion

For the reasons set forth in this response, the Commission should find no reason to believe that the Second Congressional District Delegates for Mondale Committee violated the Federal Election Campaign Act.

Respectfully submitted,

PETER HEARN
JAMES M. BECK
Pepper, Hamilton & Scheetz
2001 The Fidelity Building
123 South Broad Street
Philadelphia, PA 19109
(215) 893-3000

Attorneys for ANTHONY MCNEIL, TREASURER, SECOND CONGRESSIONAL DISTRICT DELEGATES FOR MONDALE COMMITTEE

8504050903

Mondale for President
2201 Wisconsin Avenue, N.W.
Washington, D.C. 20007
Telephone: 333-625-1984

MONDALE

TO: MONDALE DELEGATES

FROM: ELAINE KAMARCK

DATE: JANUARY 12, 1984

RE: CONDUCTING YOUR CAMPAIGN FOR DELEGATE TO THE NATIONAL CONVENTION

Under the federal election laws, persons seeking election as delegates or alternates to the National Convention can form committees which are allowed to raise and expend money to support their candidacies. Care must be taken to assure that the enclosed legal guidelines are followed. This program can be of enormous benefit in assuring your election as a delegate. Following is a brief outline on how these committees should work.

I. Forming the Committee

Immediately upon being slated as a Mondale delegate, the campaign will assist each slate of delegates in forming a committee if they so desire. A memorandum explaining the legal procedures for forming a committee and registering and reporting to the FEC accompany this memo.

II. Raising Money

As soon as possible, the delegate committees should develop a fundraising plan which contains the following components:

1. Plan one or more grass roots fundraisers in your Congressional District

2. Solicit other Mondale supporters in your district for contributions to the Committee. (IMPORTANT NOTE: A person who has contributed the maximum amount to the Mondale campaign is allowed to make a contribution of up to $5,000 per person to each Mondale delegate committee subject only to the annual $25,000 limit per individual on contributions to all federal candidates.)

3. Solicit local organizations to which you may belong for contributions. (IMPORTANT NOTE: Contributions by corporations, labor unions, foreign nationals and federal contractors are not permitted. But

EXHIBIT "A"

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Mondale for President
2301 Wisconsin Avenue, N.W.
Washington, D.C. 20007
Telephone: 333-625-1600

MONDALE

contributions from Political Action Committees of issue groups or labor unions are permitted. Individuals and Political Action Committees can contribute up to five thousand dollars to a delegate committee. Walter Mondale has made a decision not to accept money from P.A.C.'s for his campaign. Each delegate committee may make their own decision regarding P.A.C. money.)

III. Spending Money

The money raised by Delegate Committees must be spent in the district on the conduct of a grassroots campaign. Under no circumstances can money be spent for general public advertising such as T.V., radio, newspaper ads, billboards or direct mail.

Money can be spent for campaign materials to be used by volunteers such as bumper stickers, handbills, brochures, posters and yard signs which advocate the selection of a group of delegates. These materials may include information about the Mondale candidacy as well as information about the delegate candidates. There are no requirements as to the the amount of space which must be devoted to the delegate-candidates versus the amount of space devoted to Mondale, provided the purpose and message are directed towards the selection of the delegate candidates.

Before spending any money:

- Design your campaign materials.
- Arrange for a volunteer group to distribute materials.
- Plan a "Get Out the Vote" program using volunteers. (IMPORTANT NOTE: Delegate Committees can reimburse volunteers for their expenses.)

IV. Reporting

You will have to file quarterly reports with the Federal Election Commission. Therefore be sure to:

- Keep careful records of all receipts and expenditures.
- Write checks whenever possible for all expenditures so that record keeping is easier.
- Please follow the instructions on the enclosed memorandum and when in doubt do not hesitate to call the Office of the Legal Counsel here at the campaign headquarters.

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MEMORANDUM

January 6, 1984

RE: Delegate Expenditure Committees

FROM: David Ifshin
Lyn Oliphant

FORMING A DELEGATE COMMITTEE

Under federal election law, if a group of delegates plans to raise or spend in excess of $1000 on behalf of the delegate slate, it must form a delegate committee. This committee must file two types of forms containing routine information with the Federal Election Commission: a Statement of Organization (Form 1) and a Report of Receipts and Expenditures (Form 3X). Copies of these forms are attached. Additional forms may be obtained from the legal office at the national headquarters.

The first step for a delegate committee is to designate a treasurer and to open a separate committee bank account.

Within 10 days of the time when your delegate committee raises contributions totalling in excess of $1000 or spends more than $1000, the treasurer must file a Statement of Organization with the FEC (Form 1).

HOW TO FILL OUT A STATEMENT OF ORGANIZATION

A Statement of Organization is a simple form designed to provide the FEC with basic information about political committees. Complete instructions are on the back of the form. In order to prepare a Statement for a delegate committee, the following should be kept in mind.

Line 1: Your committee's name is inserted on line 1. Under the

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law, the name of your committee must include the word "delegate(s)," and may include the name of the presidential candidate which it supports. For example, "XYZ Delegate Committee" or "XYZ Delegates for Mondale."

Line 2: This line requests the date when your group became a political committee. The date may be anytime prior to 10 days before the committee receives or expends its first $1000.

Line 3: If your committee is registering for the first time, you need not fill in this blank.

Line 4: If your committee is registering for the first time, you should check "NO."

Line 5: Delegate committees should check "(c)" and fill in the name of Walter F. Mondale.

Line 6: Fill in "NONE."

Line 7: This line requests the name of the person who will keep the records and books of your committee. If this is the treasurer, you may simply fill in "Treasurer."

Line 8: This line requests the name and address of the treasurer and assistant treasurer, if any. Your committee must have a treasurer, but need not have an assistant treasurer. The treasurer and assistant treasurer may, but are not required to be, candidates for delegate.

Line 9: Your committee funds must be kept in a separate checking account which contains only committee funds. This line requests the name and address of the bank in which the committee has its account. If for any reason a second account is needed or the funds are to be kept anywhere other than a bank, please consult with your state coordinator. Under the law, each committee makes

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all its disbursements by check drawn on the committee's account, except for expenditures of less than $100 made from a petty cash fund. If a petty cash fund is established, records must be kept of all disbursements from it.

Once the Statement of Organization has been completed, the treasurer must sign and date it. It should then be sent to the Federal Election Commission, 1325 K Street, N.W., Washington, D.C. 20463. A copy must also be filed with the Secretary of State in your state. Any changes in the information reported on the Form must be reported to the FEC in writing within 10 days of the date of the change. Please send a copy of the Statement of Organization and all other filings of the committee with the FEC to the national headquarters, attention General Counsel's office.

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REPORTING REQUIREMENTS FOR RECEIPTS AND DISBURSEMENTS (Form 3X)

The Report of Receipts and Disbursements is a means of providing public disclosure of the financial activity of political committees. Complete instructions for periodic reporting of your financial activity are contained on the attached Report of Receipts and Disbursements (Form 3X). When completed, these reports should be forwarded to the Federal Election Commission, 1325 K Street, N.W., Washington, D.C. 20463. (A copy of the portion of the report applicable to activity in connection with a candidate's election in a state must also be filed with the Secretary of State in that state.) Please send a copy of all reports to the national headquarters, attention General Counsel's Office.

I. Quarterly Reports

Under the law, delegate committees must file quarterly Reports of Receipts and Disbursements (Form 3X) no later than April 15, July 15, October 15, and January 31 of next year. Each report must itemize the funds the committee has raised and expended during the period since the filing of the previous report.

II. Pre-election Reports

In addition to the quarterly reports, a preelection report is filed no later than the 12th day before a primary election in connection with which your committee makes contributions or expenditures. Such reports must include all transactions from the closing date of the last quarterly report filed, through the 20th day before the election. The Commission publishes lists of filing dates which are forwarded to all registered committees.

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That information will also be available through the legal office at the national headquarters.

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The FEC forms divide receipts into eight categories for the purpose of reporting. These are:

Contributions from Individuals/Persons
Contributions from Political Committees
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Loans Received
Loan Repayments Received
Offsets to Operating Expenditures
Contribution Refunds Received from Candidates and Committees
Other Receipts

Total receipts in these categories are reported on the Detailed Summary Page.

In addition, certain receipts are itemized on a separate Schedule A, (e.g. contributions from individuals/persons in excess of $200 or aggregating in excess of $200 during a calendar year). The instructions for Form 3X indicate those receipts which must be itemized on Schedule A. A separate Schedule A must be used for each category of receipt.

IV. Contents of Reports - Disbursements

Similarly, the FEC forms divide disbursements into eight categories for the purpose of reporting. These are:

Operating Expenditures
Transfers to Affiliated Committees
Contributions to Federal Candidates and Political Committees
Independent Expenditures
Loan Repayments Made
Loans Made
Contribution Refunds Made
Other Disbursements

Total disbursements in these categories are reported on the

8504050910

In addition, some disbursements must be itemized on a separate Schedule B. Three categories (operating expenditures, independent expenditures, and other disbursements) must be itemized on Schedule B only if they exceed $200 or when added to other disbursements made to the same person, aggregate over $200 during a calendar year. Disbursements under the other categories must be itemized on Schedule B regardless of amount. A separate Schedule B must be used for each category of disbursement.

V. Additional Schedules for Receipts and Expenditures

Certain kinds of receipts and expenditures must also be listed on specific schedules in addition to the general Schedules A and B. These are: loans owed by and to the committee (Schedule C); other debts and obligations (Schedule D); and independent expenditures (Schedule E).

RECORDKEEPING REQUIREMENTS

Federal election law requires your committee to keep records of all receipts and disbursements. The treasurer has the responsibility to exercise best efforts to obtain and maintain these records.

There is no specific recordkeeping or accounting system required by the law. However, it is recommended that a committee keep a separate account for each of the various categories of receipts and disbursements on the Detailed Summary Page. This will assist you in filling out the Detailed Summary Page as well as Schedules A-E, as necessary.

For contributions received in the form of a check, it is recommended that photocopies of the checks be made and kept by

8504050911

the committee's treasurer.

All disbursements must be made by check or similar draft from a committee depository, except petty cash expenditures of $100 or less. A written journal of disbursements from petty cash must be maintained.

The Committee treasurer must preserve all records for 3 years after the filing date of the report corresponding to the records.

8504050091 2

Official MONDALE Delegate's Ballot

On Tuesday, April 10th Elect

THE SECOND CONGESSIONAL DISTRICT

Mondale Delegates

DELEGATE TO NATIONAL CONVENTION

139 Blondell REYNOLDS
153 Rosalee GEORGE
157 Matthew DAVIS
163 Fred LUKE
164 Patricia J. KALPIK
174 Doris A. SMITH
178 Herman WOODEN
184 Ann J. LAND
185 Arnold C. STORR

ALTERNATE DELEGATE

195 Dennit C. WHITE
197 Jeffrey D. MORAN
199 Leslie B. KERKODLE

8504005009I3

EXHIBIT "B"

CONTRIBUTIONS

NAME	ADDRESS		AMOUNT
MITCHELL, THOMASINA	3607 W WESTMORELAND	PHILA. 19129	20.00
GEORGE, ROSALEE	1939 POPLAR ST.	PHILA 19130	25.00
HOLLAN, PATRICIA	3300 W PENN ST	" 19120	25.00
TARSLEY, LEVI	1220 N BROAD ST	" 19121	100.00
REDDER, MICHELE	1610 MORRIS ST	" 19150	100.00
DAVISON, BARBARA	8138 ANGELA PL.	" 19153	25.00
FORD, PHYLLIS	5867 OVERLAND WAY	" 19131	20.00
STOVALL, SANDRA	408 N SALFORD ST	" 19151	15.00
JONES, FRANCES	3601 CONSHOHOCKEN ST	" 19131	10.00
RUBY BENSON	616 E PHILADELPHIA ST	" 19103	25.00
JOHNSON, WILLIAM	5007 RENO ST.	" 19139	25.00
HOGANS LEN	21st CHESTNUT ST	"	210.00
BECK JIM	122 S BROAD ST	" 19	100.00
GIULIA, JOANNE			1000.00
DOYLE, SONNY			200.00
	CONTRIBUTIONS FROM PAC		1710.00
*AFSCME			1200.00
*AMERICAN FEDERATION TEACHERS			500.00
			1600.00
		TOTAL	3210.00

EXHIBIT "C"

8504050091 4

REPORTING PERIOD - Pre Primary 2-24-87 3-24-87

TOTAL RECEIPTS		1,500
TOTAL DISBURSEMENT		500
CASH ON HAND END REPORT	1,100	
EXPENDITURES		
CAR RENTAL		200
PER DIEM		300
	TOTAL	500

EXHIBIT "D"

8504050091 5

ENDING REPORT 3-24-84 to 4-27-84

TOTAL RECEIPTS $210

TOTAL DISBURSEMENT 2,295.32

EXPENDITURES

PRINTING	540.60
PER DIEM	1,345.21
FUND RAISER	400.00
BANK SERVICE CHARGE	9.51
TOTAL	2,295.32

TOTALS FROM BOTH PERIOD

RECEIPTS	3210
EXPENDITURES	2,795.32
BAL.	414.68

8504050091 6





PEPPER, HAMILTON & SCHEETZ
ATTORNEYS AT LAW
2001 FIDELITY BUILDING
123 SOUTH BROAD STREET
PHILADELPHIA, PA. 19109

TO

Stephen Mims, Esquire
General Counsel's Office
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

REGISTERED MAIL

R 185 154 954

STATEMENT OF DESIGNATION OF COUNSEL

MUR MUR 1667 + 1704

NAME OF COUNSEL: Pepper, Hamilton & Scheetz (Peter Hearn, James M. Beck, Esqs.')

ADDRESS: 2001 The Fidelity Building
123 South Broad Street
Philadelphia, PA 19109

TELEPHONE: (215) 893-3000

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.

6-4-84
Date

Anthony M. McNeil
Signature

RESPONDENT'S NAME: ANTHONY MCNEIL 2nd CD

ADDRESS: 632 MAY Place
PHILA PA. 19135

HOME PHONE: (215) 879-1934

BUSINESS PHONE:

8504050091 8

STATEMENT OF DESIGNATION OF COUNSEL

MUR MUR 1667 + 1704

NAME OF COUNSEL: Pepper, Hamilton & Scheetz (Peter Hearn, James M. Beck, Esqs.')

ADDRESS: 2001 The Fidelity Building
123 South Broad Street
Philadelphia, PA 19109

TELEPHONE: (215) 893-3000

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.

6-4-84
Date

Anthony M. McNeil
Signature

RESPONDENT'S NAME: ANTHONY McNEIL

ADDRESS: 632 MAY Place
PHILA PA 19139

2nd CD

HOME PHONE: (215) 879-1934

BUSINESS PHONE:

8504050019

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Anthony McNeil, Treasurer
Second Congressional District
Delegates For Mondale
632 May Place
Philadelphia, PA 19139

Re: MUR 1667

Dear Mr. McNeil:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

8504050920

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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

8504050092 1

BILL TO PENTON I P C PUBLISHING
SHIP TO D SIEVERS
1111 CHESTER AVE
CLEVELAND OH 44114

44114PENTO111

Invoice No. 85123
Invoice Date 3/20/84
Your P.O. No.

Badge A Minit

ITEM CODE	QUANTITY	ITEM DESCRIPTION	ITEM COST	ITEM TOTAL	SHIP & HANDLE
1500 R	1	1 BADGE-A-MINIT BENCH SYS BAS C	81.95	81.95	4.35
		SUB-TOTAL		81.95	

UPS**TOTAL SHP/HNDLG COST 4.35

THANK YOU FOR YOUR ORDER. THE TOTAL AMOUNT OF THIS INVOICE IS..... 86.30

REMITTANCE COPY CHARGED TO CREDIT CARD 86.30

3730 420695 41001
Dorothy Sievers
548526 06 748 464-MC
1267 20564 000-VISA
6812908769DC 3126701559
BADGE A MINIT
Total 86.30
Please Print Firmly
Cardmember Copy
606282
Record of Charges

Invoice Date
Your P.O. No.
Badge A Minit

THANK YOU FOR YOUR ORDER

4/18/84 Gallon

CASH		
BROKEN DOWN 314	25	00
1065	17	00
TOTAL FROM OTHER SIDE		
TOTAL	$ 42	00

88-2/531

PLEASE ITEMIZE ADDITIONAL CHECKS ON REVERSE SIDE

DATE April 18 19 84

ITEMS AND SUMS ARE RECEIVED FOR DEPOSIT SUBJECT TO THE TERMS AND CONDITIONS OF THE DEPOSITOR'S COLLECTION AGREEMENT

NCNB National Bank of North Carolina Greensboro, NC 27420

⑆053100559⑆ 0212743298

314

MARTHA W. KNOX
NCDL 9570 PH 292-0692
1007 VALLEYMEADE RD
GREENSBORO, NC 27410

April 17 19 84 88-2/531

Pay To The Order Of Guilford Delegation for Mondale $ 25.00

Twenty-five and no/100 Dollars

NCNB National Bank of North Carolina Greensboro, NC 27405

For

Martha W. Knox

⑆053100559⑆ 0242726359 0314

1065

CHARLES ALLEGRONE NCDL 2280168
HELEN R. ALLEGRONE PH 292-0672
1008 FOREST HILL DR
GREENSBORO, NC 27410

April 18 19 84 88-7060/2531 1

PAY TO THE ORDER OF Guilford Delegates for Mondale $ 17 00/100

Seventeen and 00 DOLLARS

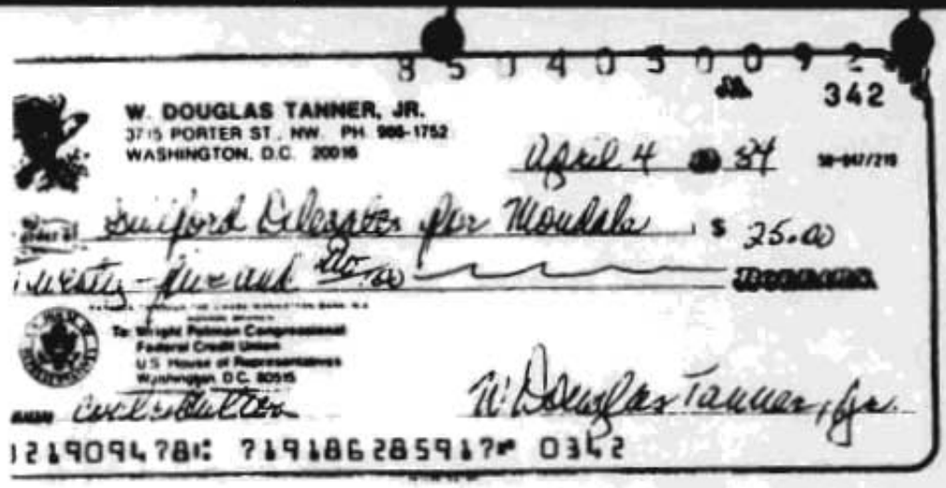
1ST HOME FEDERAL Greensboro, North Carolina

FOR Cash contributions

Helen R. Allegrone

⑆253170596⑆ 026 021 816 1065

8530405009923



W. DOUGLAS TANNER, JR.
3715 PORTER ST., NW PH 966-1752
WASHINGTON, D.C. 20016

342

April 4 84

Guilford Delegates for Mondale $ 25.00

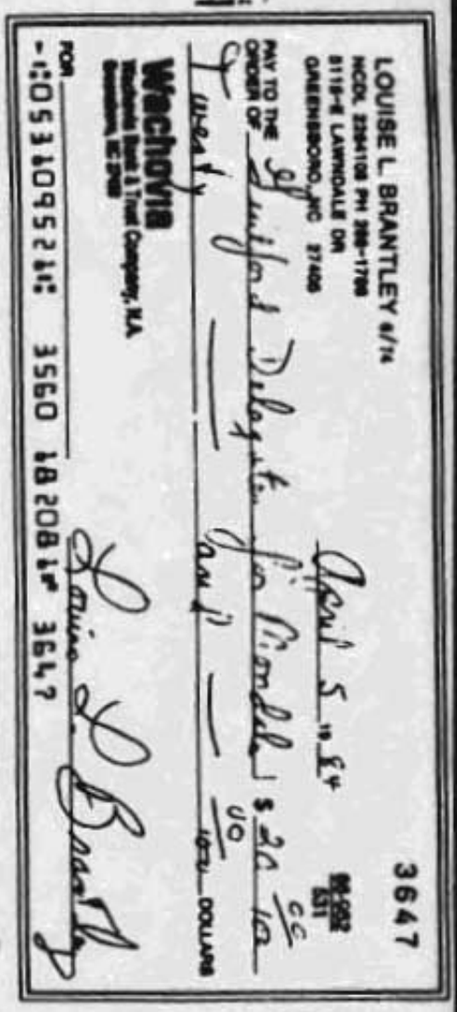
Twenty-five and 00/100 DOLLARS

To: Wright Patman Congressional Federal Credit Union
U.S. House of Representatives
Washington, D.C. 20515

For Convention

W. Douglas Tanner, Jr.

:121909478: 719186285917# 0342



LOUISE L. BRANTLEY 6/74
NCDL 2394108 PH 288-1788
5118-E LAWNDALE DR
GREENSBORO, NC 27408

PAY TO THE ORDER OF Guilford Delegates for Mondale $ 20.00 cc

Twenty and 00/100 DOLLARS

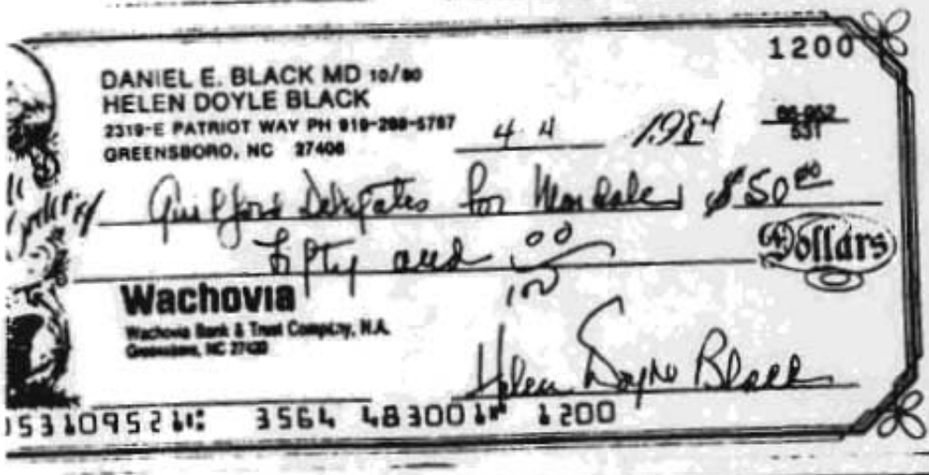
Wachovia
Wachovia Bank & Trust Company, N.A.
Greensboro, NC 27420

FOR Convention

Louise L. Brantley

:053109521: 3560 18208# 3647

3647



DANIEL E. BLACK MD 10/80
HELEN DOYLE BLACK
2319-E PATRIOT WAY PH 919-288-5787
GREENSBORO, NC 27406

1200

4-4 1984

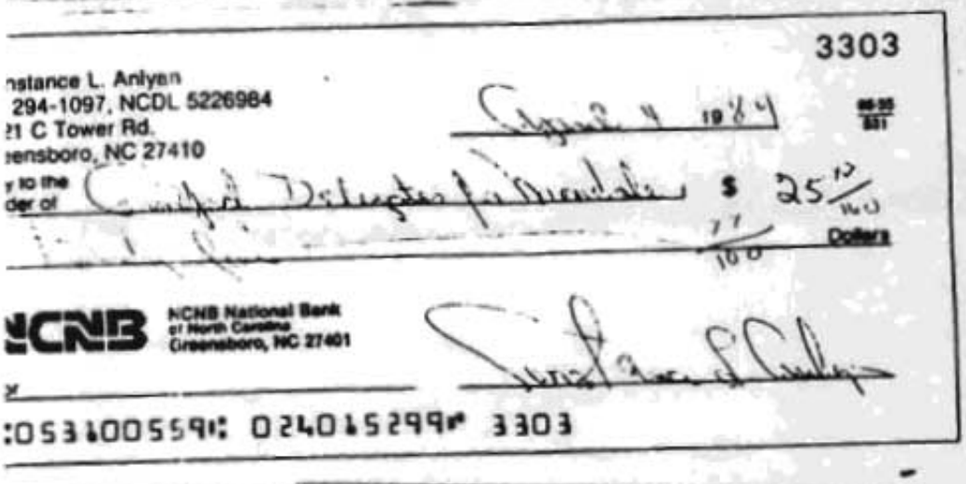
Guilford Delegates for Mondale $50.00

Fifty and 00/100 Dollars

Wachovia
Wachovia Bank & Trust Company, N.A.
Greensboro, NC 27420

Helen Doyle Black

:053109521: 3564 48300# 1200



3303

Constance L. Anlyan
294-1097, NCDL 5226984
21 C Tower Rd.
Greensboro, NC 27410

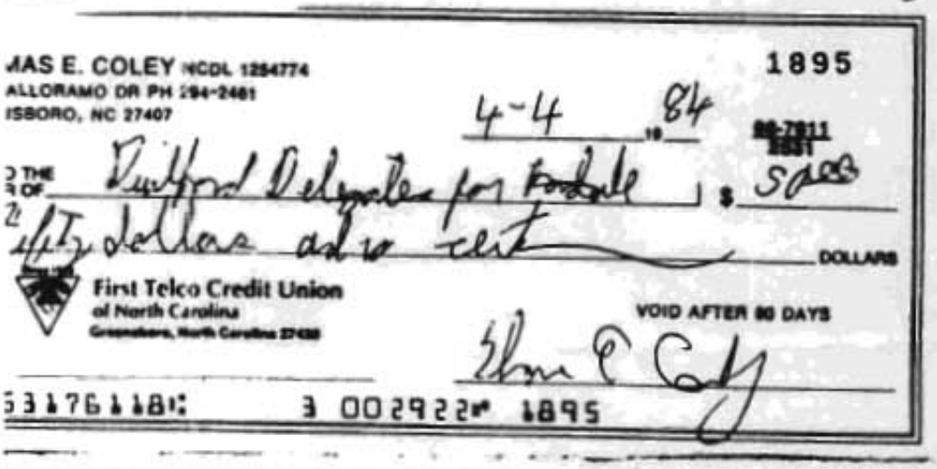
April 4 1984

Pay to the Order of Guilford Delegates for Mondale $ 25.00

Twenty-five and 00/100 Dollars

NCNB National Bank of North Carolina
Greensboro, NC 27401

:053100559: 0240152998 3303



JAMES E. COLEY NCDL 1254774
ALLORAMO DR PH 294-2481
GREENSBORO, NC 27407

1895

4-4 19 84

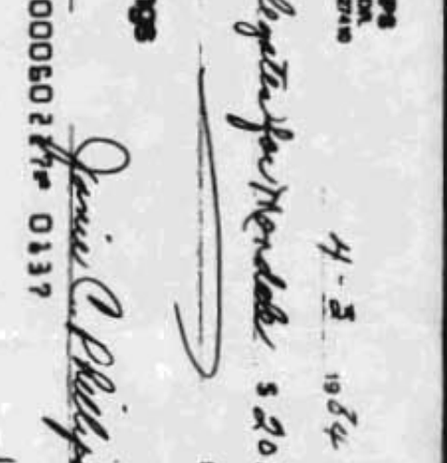
PAY TO THE ORDER OF Guilford Delegates for Mondale $ 50.00

Fifty Dollars and no cents DOLLARS

First Telco Credit Union of North Carolina
Greensboro, North Carolina 27420

VOID AFTER 90 DAYS

:053176188: 3 002922# 1895



JANIE C. PHILLIPS
1900 STRATHMORE DR.
GREENSBORO, N.C. 27410

137

4-24 1984

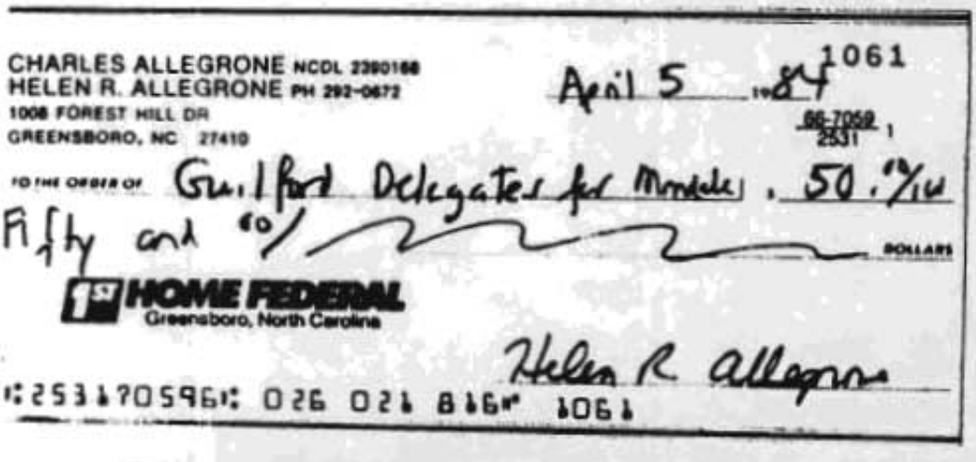
Guilford Delegates for Mondale $ 20.00

Twenty and 00/100 DOLLARS

GateCity Savings

:253170581: 1100000602# 0137

Janie C. Phillips



CHARLES ALLEGRONE NCDL 2390166
HELEN R. ALLEGRONE PH 292-0672
1008 FOREST HILL DR
GREENSBORO, NC 27410

1061

April 5 1984

TO THE ORDER OF Guilford Delegates for Mondale $ 50.00

Fifty and 00/100 DOLLARS

1st HOME FEDERAL
Greensboro, North Carolina

Helen R Allegrone

:253170596: 026 021 816# 1061

DATE April 24 19 84

CASH	200	00
TOTAL FROM OTHER SIDE		
TOTAL	202	00

PLEASE ITEMIZE ADDITIONAL CHECKS ON REVERSE SIDE

NCNB National Bank of North Carolina Greensboro, NC 27420

⑆053100559⑆ 0212743294

HELEN R. ALLEGRONE
1088 FOREST HILL DR
GREENSBORO, NC 27410

182

April 24 19 87

PAY TO THE ORDER OF Guilford Delegate for Mondale $ 200.00

Two hundred 00/100 DOLLARS

Wachovia
Wachovia Bank & Trust Company, N.A.
Greensboro, NC 27420

CASH INVESTMENT ACCOUNT

FOR

Helen R Allegrone

⑆053109521⑆ 3561 367022 0182

DATE April 11 19 84

CASH		
TOTAL FROM OTHER SIDE		
TOTAL	50	00

PLEASE ITEMIZE ADDITIONAL CHECKS ON REVERSE SIDE

NCNB National Bank of North Carolina Greensboro, NC 27420

⑆053100559⑆ 0212743294

DR. OR MRS. RICHARD BARDOLPH
207 TATE ST.
GREENSBORO, N.C. 27403

585

April 11 19 84

PAY TO THE ORDER OF Guilford Delegates for Mondale $ 50.00

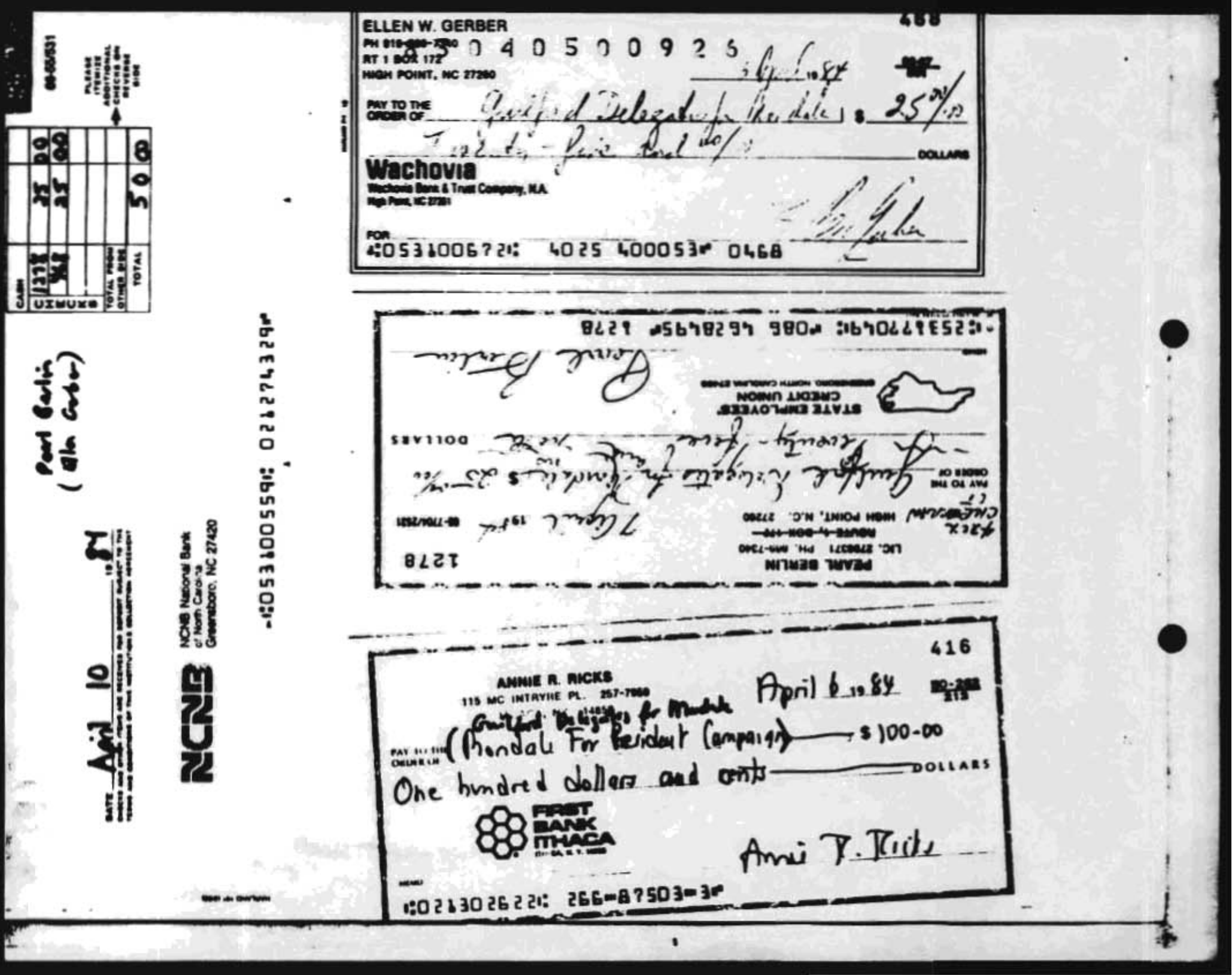
Eighty & Two DOLLARS

Northwestern Bank

Richard Bardolph

⑆053103518⑆ 0585

8504005009225



ELLEN W. GERBER
PH 819-889-7580
RT 1 BOX 172
HIGH POINT, NC 27260

0405009256

468

April 6 19 84

PAY TO THE ORDER OF Guilford Delegates for Mondale $ 25.00

Twenty-five and 00/

DOLLARS

Wachovia
Wachovia Bank & Trust Company, N.A.
High Point, NC 27261

FOR

Ellen W. Gerber

:053100672: 4025 400053 0468

CASH 1237 50 TOTAL FROM OTHER SIDE 50 00 TOTAL 50 00

PLEASE ITEMIZE ADDITIONAL CHECKS ON REVERSE SIDE

88-65/531

Pearl Berlin (Ida Gerber)

DATE April 10 19 84

NCNB

NCNB National Bank of North Carolina Greensboro, NC 27420

:053100559: 0212743294

1278

PEARL BERLIN
LIC. 2780371 PH. 889-7340
ROUTE 4 BOX 172
HIGH POINT, N.C. 27260

DATE April 7 19 84 88-770/2521

PAY TO THE ORDER OF Guilford Delegates for Mondale $ 25.00

Twenty-five and 00/ DOLLARS

STATE EMPLOYEES' CREDIT UNION
GREENSBORO NORTH CAROLINA 27420

Pearl Berlin

:253197049: 0086 462849 1278

416

ANNIE R. RICKS
115 MC INTYRE PL. 257-7060

April 6 19 84 80-288/213

PAY TO THE ORDER OF Guilford Delegates for Mondale (Mondale For President Campaign) $100.00

One hundred dollars and cents DOLLARS

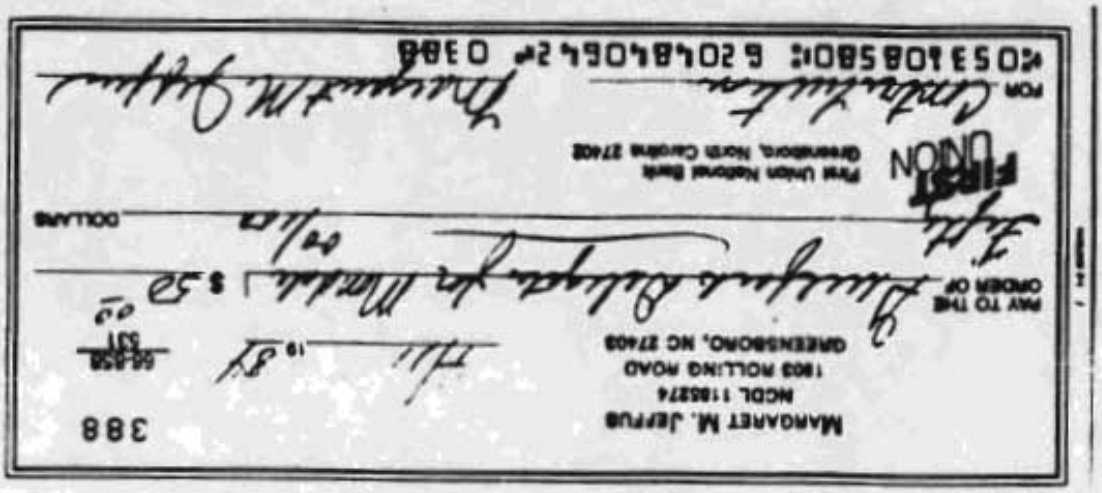
FIRST BANK ITHACA

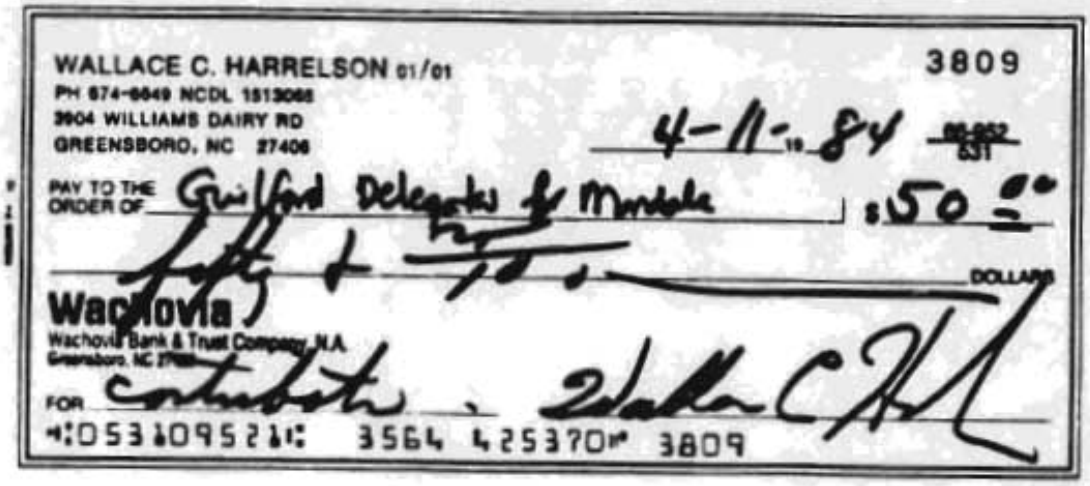
Annie T. Ricks

MEMO

:021302622: 266-8?503-3

8504050009277





DEPOSIT TICKET

Jeffus Harrelson

CASH		
CHECKS	50	00
	$ 50	00
TOTAL FROM OTHER SIDE		
TOTAL	100	00

[redacted]

66-55/531

PLEASE ITEMIZE ADDITIONAL CHECKS ON REVERSE SIDE

DATE April 12 19 84

CHECKS AND OTHER ITEMS ARE RECEIVED FOR DEPOSIT SUBJECT TO THE TERMS AND CONDITIONS OF THIS INSTITUTION'S COLLECTION AGREEMENT

NCNB

NCNB National Bank
of North Carolina
Greensboro, NC 27420

053100559: 021221328

RECEIVED BY THE FEC
Case # 380
84 JUN 25 P12:32

June 20, 1984

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

Re: MUR 1704

Dear Mr. Steele,

Thank you for your letter of May 29th informing me that my committee may in violation of certain sections of the Federal Election Campaign Act of 1971.

To date, the Cuyahoga County Mondale Delegates Committee has not accepted any P.A.C. money and has made no expendatures so I feel that the claims against me and my committee are not valid.

Please see that this matter is kept confidential.

I will not be obtaining counsel at this time.

Sincerely,

Dorothy J. Sievers, Treasurer
Cuyahoga County Mondale Delegated Committee

14018 Clifford Avenue
Cleveland, Ohio 44135

JUN 25 P3:30

8 5 0 4 0 5 0 0 9 2 3

A. Sevin
14018 Cliffside
Clev, O 44135

8504050092 9

CLEVELAND, OH
PM
22 JUN
1984

84 JUN 25

Federal Election Comm
1325 K Street NW
Washington DC 20463

Attn Mr Charles N Steele
Re MW 1704

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

May 31 1984

84 JUN 4 PM 12:28

84 JUN 4 P3:54

MUR 1667
Memo

Re MUR 1667

Dear Mr Steel,

In answer to your letter to me of May 11, 1984 and May 25, 1984 pertaining to the notification that the Cuyahoga County Mondale Delegates Committee and I as its treasurer may be in violation of certain sections of the federal Election Act of 1971:

To my knowledge, the Cuyahoga County Mondale Delegates Comm. has not violated either the spirit or the letter of any Federal Election Laws. I hereby submit below my responses to the charges being brought against my committee.

Allegation: That the Delegates Committee is not "Independent"

The formation of the Cuyahoga County Mondale Delegates Comm. was my idea & my suggestion. As early as March 13th I approached Mondale State staffers in Ohio if the Campaign would object to the delegates raising funds independently.

My intention was to raise funds for small expenditures accrued by delegates, such as gasoline, meals for volunteers, lodging for volunteers, ect.

On March 30th a State staffer directed me to a National Staff person who, in turn, gave me the blessing of the Mondale Campaign to form the Committee.

On March 30th and again on April 4th, instructions were given to me from the Mondale Campaign that we were not part of the Campaign & were to act independently of it.

We were however, encouged by the Mondale Campaign to: ① accept no P.A.C. money ② accept no contributions from Unions or Corp. ③ make sure disclaimers were on any printed material ④ we should not purchase any media.

From April 4th to date the only other instructions or even encouragement I received was for dissolving the committee.

Allegation: That the Delegates Comm was paying salaries and for expenses of Mondale Staff.

The Cuyahoga County Mondale Delegates Comm. never paid salaries or expenses to anyone. (one attended report)

Allegation: Mondale Delegate Committee were ignoring the request to shut down.

The Cuyahoga County Mondale Delegate Comm. will be shutting down as soon as we break even financially and are given the O.K. by the Federal Election Commission.

Allegation: Mondale Delegate Comm are receiving P.A.C. money and money from people who have "maxed out".

The Cuyahoga County Mondale Delegate Comm. accepted no P.A.C. money nor to our knowledge, received funds from anyone who had reached their limit with the Mondale Campaign (see attached report).

Allegation: Mondale Delegate Comm. funneled money + materials to the Mondale Campaign.

The Cuyahoga County Mondale Delegate Comm. has not to date made any expenditures. (see attached report)

I feel that the above explanations are sufficient information to complete this investigation int. the Cuyahoga County Mondale Delegate Comm; however I will be happy to provide any additional information you request.

Although the Cuyahoga County Mandate Delegation Comm. has nothing to hide I hope that my responses be kept confidential. I will not be retaining legal counsel at this time but retain the right to do so should the situation warrant it.

Sincerely,

Dorothy J. Sinis, Treas

Cuyahoga County Mandate Delegation Comm.
1401 E. Clifford Avenue
Cleveland, Ohio 44135

Enclosure: FEC Reports

C.C. Kenneth A Gross
Associate Gen Counsel

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

RECEIVED AT THE FEC

(Summary Page)

ALIGN AREA | | ALIGN AREA | | JUN 4 PM 1:28

1. Name of Committee (In Full)
Cuyahoga County Mondale Schmitz Comm.

Address (Number and Street)
14018 Cliffland ave

City, State and ZIP Code
Cleveland, Ohio 44135

☐ Check here if address is different than previously reported

2. FEC Identification Number
C00181394

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

4. TYPE OF REPORT (Check appropriate block)

(a)
☐ April 15 Quarterly Report ☐ October 15 Quarterly Report
☐ July 15 Quarterly Report ☐ January 31 Year End Report
☐ July 31 Mid Year Report (Non-Election Year Only)
☒ Monthly Report for May 1984
☐ Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____
☐ Thirtieth day report following the General Election on _____ in the State of _____
☐ Termination Report

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

SUMMARY

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period May 1, 1984 through May 31, 1984		
6. (a) Cash on hand January 1, 19__		$ 0
(b) Cash on Hand at Beginning of Reporting Period	$ 9.41	
(c) Total Receipts (from Line 18)	$ 85.00	$ 336.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ 104.41	$ 336.00
7. Total Disbursements (from Line 28)	$ 86.30	$ 317.89
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 18.11	$ 18.11
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)	$ —	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	$ 102.25	

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

Dorothy J. Sievers
Type or Print Name of Treasurer

Dorothy J. Sievers
SIGNATURE OF TREASURER

5/31/84
Date

For further information contact:
Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4068

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

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

FEC FORM 3X (3/80)

Page 11 of 11 for
LINE NUMBER _____
(Use separate schedule(s) for each category of the Detailed Summary Page)

SCHEDULE A **ITEMIZED RECEIPTS**

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

Name of Committee (in Full) Cuyahoga County Democratic Delegate Caucus

A. Full Name, Mailing Address and ZIP Code Mary Simms 14818 Clifford Cleve, O 44135 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer None Occupation Aggregate Year-to-Date–$	Date (month, day, year) 5/10/84	Amount of Each Receipt this Period 45.00
B. Full Name, Mailing Address and ZIP Code Barbara Boyde 3418 Washington Cleveland Hts O Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer City of Cleveland Hts Occupation Council Person Aggregate Year-to-Date–$	Date (month, day, year) 5/7/84	Amount of Each Receipt This Period 10.00
C. Full Name, Mailing Address and ZIP Code other contributions not listed none contributing more than 10.00 each (Sale of Political Buttons) Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer 0 in Occupation Aggregate Year-to-Date–$	Date (month, day, year) 5/10/84 deposit	Amount of Each Receipt This Period 30.00
D. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date–$	Date (month, day, year)	Amount of Each Receipt This Period
E. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date–$	Date (month, day, year)	Amount of Each Receipt This Period
F. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date–$	Date (month, day, year)	Amount of Each Receipt This Period
G. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date–$	Date (month, day, year)	Amount of Each Receipt This Period
SUBTOTAL of Receipts This Page (optional)			
TOTAL This Period (last page this line number only)			85.00

8504050935

SCHEDULE B **ITEMIZED DISBURSEMENTS**

Page 1 of 1 for LINE NUMBER ____
(Use separate schedule(s) for each category of the Detailed Summary Page)

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

Name of Committee (In Full)

Cuyahoga County Democratic Party

A. Full Name, Mailing Address and ZIP Code Badge A Mint Box 800 Civic End Plz La Salle Ill 61301	Purpose of Disbursement Button Supplies Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 6/10/84	Amount of Each Disbursement This Period 86.30
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			86.30

8504005093 6

SCHEDULE C
(Revised 3/80)

LOANS

Page 1 of 1 for
LINE NUMBER ____
(Use separate schedules for each numbered line)

Name of Committee (in full)
Cuyahoga County Democratic Delegation Comm

A. Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Cumulative Payment To Date	Balance Outstanding at Close of This Period
Election: ☐ Primary ☐ General ☐ Other (specify): None			
Terms: Date Incurred _____ Date Due _____ Interest Rate _____ %(apr) ☐ Secured			
List All Endorsers or Guarantors (if any) to Item A			
1. Full Name, Mailing Address and ZIP Code / Name of Employer / Occupation / Amount Guaranteed Outstanding $			
2. Full Name, Mailing Address and ZIP Code / Name of Employer / Occupation / Amount Guaranteed Outstanding $			
3. Full Name, Mailing Address and ZIP Code / Name of Employer / Occupation / Amount Guaranteed Outstanding $			

B. Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Cumulative Payment To Date	Balance Outstanding at Close of This Period
Election: ☐ Primary ☐ General ☐ Other (specify):			
Terms: Date Incurred _____ Date Due _____ Interest Rate _____ %(apr) ☐ Secured			
List All Endorsers or Guarantors (if any) to Item B			
1. Full Name, Mailing Address and ZIP Code / Name of Employer / Occupation / Amount Guaranteed Outstanding $			
2. Full Name, Mailing Address and ZIP Code / Name of Employer / Occupation / Amount Guaranteed Outstanding $			
3. Full Name, Mailing Address and ZIP Code / Name of Employer / Occupation / Amount Guaranteed Outstanding $			
SUBTOTALS This Period This Page (optional)			
TOTALS This Period (last page in this line only)			

Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.

8504050937

SCHEDULE D
(Revised 3/80)

DEBTS AND OBLIGATIONS
Excluding Loans

Page 1 of 1 for
LINE NUMBER ____
(Use separate schedules for each numbered line)

Name of Committee (in Full) Cuyahoga County Democratic Executive Committee	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor Barbara A Mink Box 900 Civic End Pk Peoria Ill 61301 (This is on my Credit Card)				
Nature of Debt (Purpose): Bottom Quote	—	102.25	—	102.25
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
1) SUBTOTALS This Period This Page (optional)				
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)				102.25

85040509033

SCHEDULE E

ITEMIZED INDEPENDENT EXPENDITURES

(See Reverse Side for Instructions)

Page 1 of 1 Pages

Name of Committee (in Full): Cuyahoga County Marshal Deputies Comm.

I.D. No.: 000181594

Full Name, Mailing Address & ZIP Code of Each Payee	Purpose of Expenditure	Date (month, day, year)	Amount	Name of Federal Candidate supported or opposed by the expenditure & office sought
None				☐ Support ☐ Oppose
				☐ Support ☐ Oppose
				☐ Support ☐ Oppose
				☐ Support ☐ Oppose
				☐ Support ☐ Oppose
				☐ Support ☐ Oppose

(a) SUBTOTAL of Itemized Independent Expenditures	$	
(b) SUBTOTAL of Unitemized Independent Expenditures	$	
(c) TOTAL Independent Expenditures		$

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, concert with, or at the request or suggestion of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures did not involve the financing of dissemination, distribution, or republication in whole or in part of any campaign materials prepared by the candidate, his campaign committee or their agent.

[signature] — Signature

5/31/84 — Date

Subscribed and sworn to before me this 31st day of May, 1984

My Commission expires 11/18/87

[signature] — NOTARY PUBLIC

CHERYL A. KUBEL
Notary Public, State of Ohio
County of Cuyahoga
My Comm. Expires 11-18-87

8504050932

RECEIVED AT THE FEC

84 JUN 4 PM 2:28

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

(Summary Page)

ALIGN AREA

ALIGN AREA

1. Name of Committee (In Full)
Cuyahoga County Mondale Delegates Comm.

Address (Number and Street)
14018 Cliffside ave

City, State and ZIP Code
Cleveland, Ohio 44135

☐ Check here if address is different than previously reported

2. FEC Identification Number
C00181594

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

4. TYPE OF REPORT (Check appropriate boxes)

(a) ☐ April 15 Quarterly Report ☐ October 15 Quarterly Report
☐ July 15 Quarterly Report ☐ January 31 Year End Report
☐ July 31 Mid Year Report (Non Election Year Only)
☐ Monthly Report for _____
☐ Twelfth day report preceding _____ (Type of Election)
election on _____ in the State of _____
☒ Thirtieth day report following the Primary Election of Delegates on May 8th in the State of Ohio (note the Primary election is the election when delegates are elected.)
☐ Termination Report

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

SUMMARY

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period March 31st through May 22		
6. (a) Cash on hand January 1, 19__		$ 0
(b) Cash on Hand at Beginning of Reporting Period	$ 0	
(c) Total Receipts (from Line 18)	$ 336.00	$ 336.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ 336.00	$ 336.00
7. Total Disbursements (from Line 28)	$ 317.89	$ 317.89
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 18.11	$ 18.11
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)	$ 0	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	$ 102.25	

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

Dorothy J. Sievers, Treas.
Type or Print Name of Treasurer

Dorothy J. Sievers
SIGNATURE OF TREASURER

5/22/84
Date

For further information contact:
Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4068

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

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

FEC FORM 3X (3/80)

8504052094 10

SCHEDULE A — **ITEMIZED RECEIPTS**

Page 1 of 1 for LINE NUMBER ____
(Use separate schedule(s) for each category of the Detailed Summary Page)

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

Name of Committee (in Full): Cuyahoga County Mentally Retarded Citizens Comm.

A. Full Name, Mailing Address and ZIP Code Dorothy J Sunino 14018 Cliffside Cleve, Ohio 44135 Receipt For: X Primary ☐ General ☐ Other (specify):	Name of Employer: Boston D.A.C. Rds Occupation: Civ. Wks Aggregate Year-to-Date-$	Date (month, day, year): 4/2/84	Amount of Each Receipt this Perio: 20.00
B. Full Name, Mailing Address and ZIP Code Dorothy J Sunino (Same) Receipt For: X Primary ☐ General ☐ Other (specify):	Name of Employer: Same as above Occupation Aggregate Year-to-Date-$	Date (month, day, year): 4/9/84	Amount of Each Receipt This Perio: 50.00
C. Full Name, Mailing Address and ZIP Code Audrey Cardo 364 Laurel Dr Berea, O 44017 Receipt For: X Primary ☐ General ☐ Other (specify):	Name of Employer: State of Ohio Occupation: Secretary Aggregate Year-to-Date-$	Date (month, day, year): 4/10/84	Amount of Each Receipt This Perio: 25.00
D. Full Name, Mailing Address and ZIP Code Mary Sunino 14018 Cliffside Cleve, O 44135 Receipt For: X Primary ☐ General ☐ Other (specify):	Name of Employer: None - Retired Occupation Aggregate Year-to-Date-$	Date (month, day, year): 5/10/84	Amount of Each Receipt This Peri: 45.00
E. Full Name, Mailing Address and ZIP Code Barbara Boyd 3418 Washington Cleve Hts O Receipt For: X Primary ☐ General ☐ Other (specify):	Name of Employer: City of Cleve Hts Occupation: City Council Aggregate Year-to-Date-$	Date (month, day, year): 6/7/84	Amount of Each Receipt This Per: 10.00
F. Full Name, Mailing Address and ZIP Code Other Contributors not listed none having Contributed more than $10.00 in Cash Receipt For: X Primary ☐ General ☐ Other (specify):	Name of Employer: (bottle sales at $1.00 each) Occupation Aggregate Year-to-Date-$	Date (month, day, year):	Amount of Each Receipt This Per: 186.00
G. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date-$	Date (month, day, year)	Amount of Each Receipt This Pe
SUBTOTAL of Receipts This Page (optional)			336.00
TOTAL This Period (last page this line number only)			336.00

SCHEDULE B — ITEMIZED DISBURSEMENTS

Page 1 of 1 for LINE NUMBER ____
(Use separate schedule(s) for each category of the Detailed Summary Page)

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

Name of Committee (in Full)

Cuyahoga County Mondale Heights Comm

A. Full Name, Mailing Address and ZIP Code Mid west Ticket Pty	Purpose of Disbursement Pty for Bolton Disbursement for: X Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/10/84	Amount of Each Disbursement This Period 100.00
B. Full Name, Mailing Address and ZIP Code Orange Blossom Queen	Purpose of Disbursement Pty for Bolton Disbursement for: X Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/26/84	Amount of Each Disbursement This Period 91.59
C. Full Name, Mailing Address and ZIP Code Home Booth, Artist	Purpose of Disbursement Art work for Bolton Disbursement for: X Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/27/84	Amount of Each Disbursement This Period 40.00
D. Full Name, Mailing Address and ZIP Code Badger A Print Box 800 Cuyahoga Falls OH 44221	Purpose of Disbursement Bolton Sign. Disbursement for: X Primary ☐ General ☐ Other (specify):	Date (month, day, year) 5/10/84	Amount of Each Disbursement This Period 86.30
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			317.89
TOTAL This Period (last page this line number only)			317.89

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SCHEDULE C
(Revised 3/80)

LOANS

Page 1 of 1 for
LINE NUMBER ____
(Use separate schedules for each numbered line)

Name of Committee (in Full)
Cuyahoga County Muscular Dystrophy Assn.

A. Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Cumulative Payment To Date	Balance Outstanding at Close of This Period
Election: ☐Primary ☐General ☐Other (specify):			
Terms: Date Incurred _____ Date Due _____ Interest Rate _____%(apr) ☐ Secured			
List All Endorsers or Guarantors (if any) to Item A			
1. Full Name, Mailing Address and ZIP Code — None	Name of Employer Occupation Amount Guaranteed Outstanding $		
2. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding $		
3. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding $		

B. Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Cumulative Payment To Date	Balance Outstanding at Close of This Period
Election: ☐Primary ☐General ☐Other (specify):			
Terms: Date Incurred _____ Date Due _____ Interest Rate _____%(apr) ☐ Secured			
List All Endorsers or Guarantors (if any) to Item B			
1. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding $		
2. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding $		
3. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding $		

SUBTOTALS This Period This Page (optional)	
TOTALS This Period (last page of this line only)	

Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.

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SCHEDULE D
(Revised 3/80)

DEBTS AND OBLIGATIONS
Excluding Loans

Page 1 of 1 for
LINE NUMBER ____
(Use separate schedules for each numbered line)

Name of Committee (in Full)	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor Midwest Ticket + Pkg Co 19063 Lake Rd Rocky River, O 44116				
Nature of Debt (Purpose) Pkg. for Buttons	—	100.	100.	—
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor Badger A Mint Box 800 Civic Ctr Pk La Salle, Ill				
Nature of Debt (Purpose) Button Type.	—	86.30	86.30	—
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor Badger A Mint 4/10 Box 800 Civic Ctr Pk 4/20 La Salle, Ill 61301 5/1 Note this debt is owed to BOS the title		24.25 28.05 49.95		24.25 28.05 49.95
Nature of Debt (Purpose) Button Costs are on my credit card	—	102.25		102.25
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor Orange Blossom Pins 1935 W 25th Cleve, O 44113				
Nature of Debt (Purpose) Pkg for Buttons	—	91.59	91.59	—
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor Dave Bosak, Artist 7546 Apollo Dr Parma O 44130				
Nature of Debt (Purpose) Art work for Buttons	—	40.00	40.00	—
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor (Invoices attached)				
Nature of Debt (Purpose)				
1) SUBTOTALS This Period This Page (optional)				
2) TOTAL This Period (last page this line only)				102.25
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)				

8504050941

Midwest Ticket & Printing Co.
19063 Lake Road
(Across from the Westlake Hotel)
Rocky River, Ohio 44116

Invoice

CUYAHOGA COUNTY
DEMOCRATIC DELEGATES

Date 4-6-83

Your Order No.

Terms: Net 10 Days

QUANTITY	DESCRIPTION	AMOUNT
1000	ART BIN PRINTED FOR BUTTONS	$100
	PD CRN	
	check dated 4/10/84	
	D.J.S	

8504050 9

ORANGE BLOSSOM PRESS

1935 W. 25th St. • Cleveland, Ohio 44113 • (216) 781-9655

Name Cuyahoga County Mondale Delegate's Committee

Job No. 5173 P.O. No.

Date April 26, 1984

QUANTITY	DESCRIPTION	PRICE
200 sheets	Printing for buttons: from 2-up of reverse, 2-up of usual on 70# gloss, reflex blue ink	$ 86.00
	PAID 4-26-84 lo	
	TAX:	5.59
	TOTAL DUE:	$ 91.59

PLEASE RETURN YELLOW COPY WITH PAYMENT.

C.O.D.

9504032094 3

BILL TO PENTON I P C PUBLISHING
SHIP TO D SIEVERS
1111 CHESTER AVE
CLEVELAND OH 44114

44114PENTO111

Invoice No. 85123
Invoice Date 3/20/84
Your P.O. No.

Badge A Minit

ITEM CODE	QUANTITY	ITEM DESCRIPTION	ITEM COST	ITEM TOTAL	SHIP & HANDLE
1500 R	1	1 BADGE-A-MINIT BENCH SYS BASIC	81.95	81.95	4.35
		SUB-TOTAL		81.95	

UPS** TOTAL SHP/HNDLG COST 4.35

THANK YOU FOR YOUR ORDER. THE TOTAL AMOUNT OF THIS INVOICE IS..... 86.30

REMITTANCE COPY CHARGED TO CREDIT CARD ** 86.30



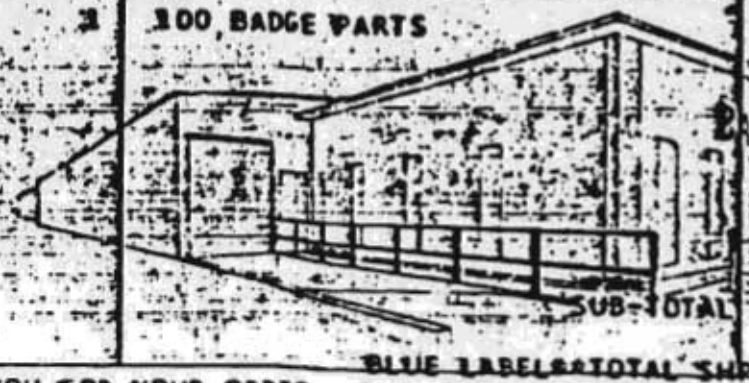
BILL TO
SHIP TO SIEVERS
14018 CLIFFORD AVE
CLEVELAND OH 44135

44135SIEVE140

Invoice No. 96823
Invoice Date 4/18/84
Your P.O. No.

Badge A Minit

ITEM CODE	QUANTITY	ITEM DESCRIPTION	UNIT PRICE	ITEM TOTAL	SHIPPING & HANDLING
3020 R	1	100 BADGE PARTS	18.25	18.25	



SUB-TOTAL 18.25

BLUE LABEL TOTAL SHP/HNDLG COST 6.00

THANK YOU FOR YOUR ORDER. THE TOTAL AMOUNT OF THIS INVOICE IS..... 24.25

CHARGED TO CREDIT CARD 24.25

REMITTANCE COPY

BILL TO
SHIP TO SIEVERS
14018 CLIFFORD AVE
CLEVELAND OH 44135

44135SIEVE140

Invoice No. 99256
Invoice Date 4/28/84
Your P.O. No.

Badge A Minit

ITEM CODE	QUANTITY	DESCRIPTION		
3020 R	1	100 BADGE PARTS	28.2500	28.2500
3320 R	1	100 PLASTIC ONLY	3.4500	3.4500
			SUB-TOTAL	31.70

THANK YOU FOR YOUR ORDER.

BLUE LABEL**TOTAL SHP/HNDLG COST 6.35
THE TOTAL AMOUNT OF THIS INVOICE IS..... 28.05

REMITTANCE COPY CHARGED TO CREDIT CARD 28.05

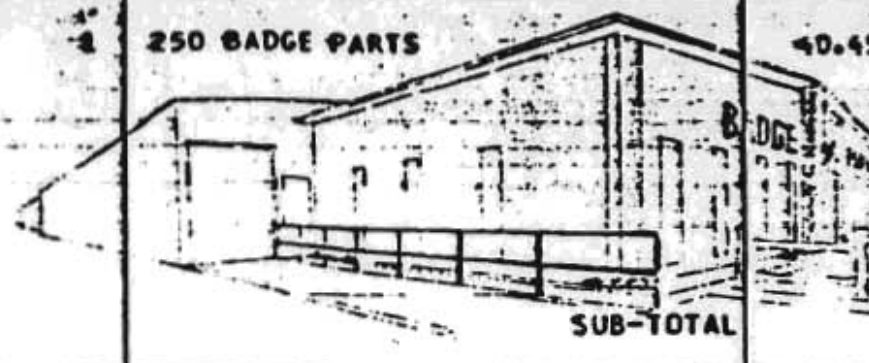
BILL TO
SHIP TO SIEVERS
14018 CLIFFORD AVE
CLEVELAND OH 44135

44135SIEVE140

Invoice No. 00073
Invoice Date 5/01/84
Your P.O. No.

Badge A Minit

ITEM CODE	QUANTITY	ITEM DESCRIPTION	ITEM COST	ITEM TOTAL	TAXABLE
250 R	1	250 BADGE PARTS	40.4500	40.45	
		SUB-TOTAL		40.45	



BLUE LABEL**TOTAL SHP/HNDLG COST 9.50

THANK YOU FOR YOUR ORDER. THE TOTAL AMOUNT OF THIS INVOICE IS..... 49.95

REMITTANCE COPY CHARGED TO CREDIT CARD 49.95

SCHEDULE E

ITEMIZED INDEPENDENT EXPENDITURES

(See Reverse Side for Instructions)

Page ____ of ____ Pages

Name of Committee (in Full): Cuyahoga County Democratic Executive Committee

I.D. No.: 000181594

Full Name, Mailing Address & Zip Code of Each Payee	Purpose of Expenditure	Date (month, day, year)	Amount	Name of Federal Candidate supported or opposed by the expenditure & office sought
None				☐ Support ☐ Oppose
				☐ Support ☐ Oppose
				☐ Support ☐ Oppose
				☐ Support ☐ Oppose
				☐ Support ☐ Oppose
				☐ Support ☐ Oppose

(a) SUBTOTAL of Itemized Independent Expenditures ..... $ _____

(b) SUBTOTAL of Unitemized Independent Expenditures ..... $ _____

(c) TOTAL Independent Expenditures ..... $ _____

Under penalty of perjury I certify that the independent expenditures reported hereon were not made in cooperation, consultation, concert with, or at the request or suggestion of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures did not involve the financing of dissemination, distribution, or republication of any candidate's campaign materials prepared by the candidate, his campaign committee or their agents.

Signature: Dorothy Sims

Date: 5/22/84

Subscribed and sworn to before me this 22nd day of May, 19 84

My Commission expires: Nov 8, 1987

Notary Public: Cheryl A. Buttl

CHERYL A. BUTTL
Notary Public, State of Ohio
County of Cuyahoga
My Comm. Expires 11-08-87

8504050095!



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Dorothy J. Sievers, Treasurer
Cuyahoga County Mondale Delegates Committee
14018 Clifford Avenue
Cleveland, OH 44135

Re: MUR 1667

Dear Mr. Sievers:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

8504050953

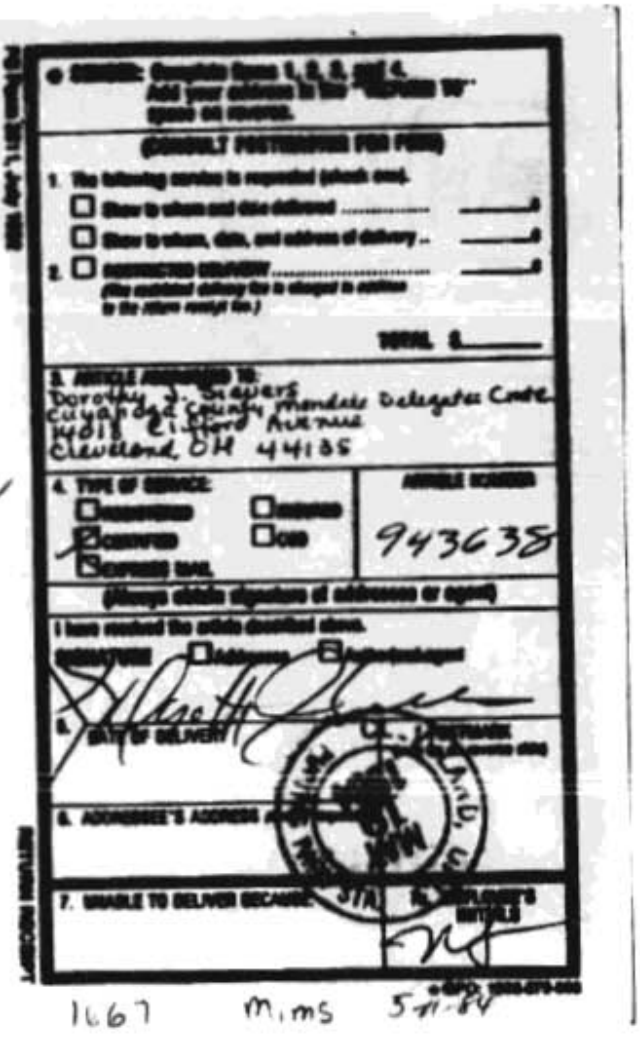
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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



8524005093 4

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Jeffrey George, Treasurer
17th District Mondale Delegate
Committee
445 Catalina Avenue
Youngstown, OH 44504

Re: MUR 1667

Dear Mr. George:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

8504050095

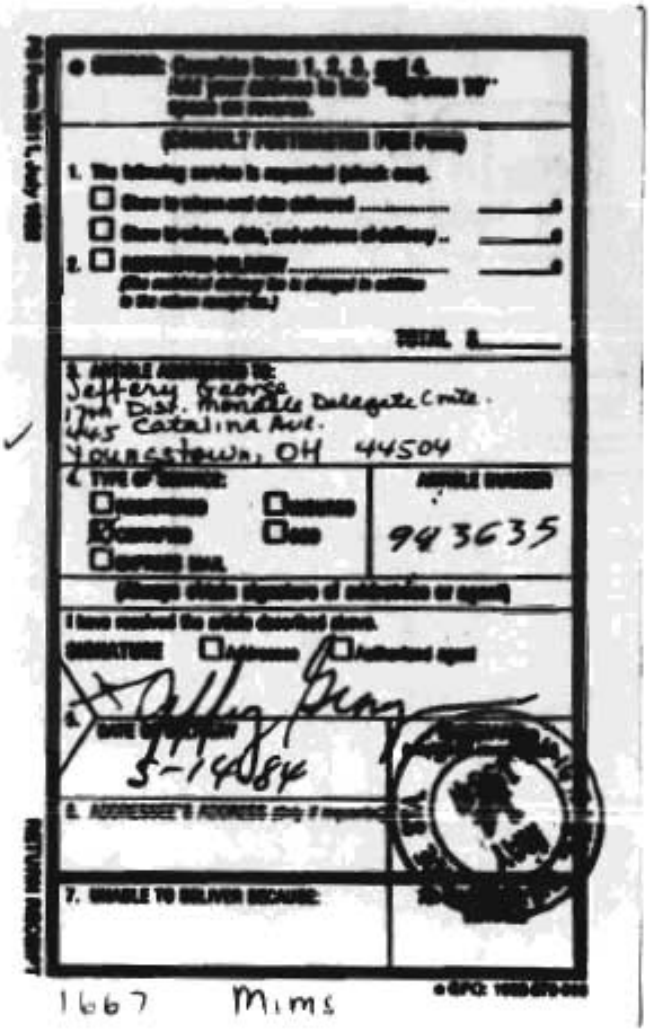
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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



1667 Mims

RECEIVED AT THE FEC
84 JUN 7 AM :55

MUR # 1704

1424 Lowell
Lima, OH 45805
June 5, 1984

7 12:39

Mr. Kenneth Gross
Federal Election Commission
Washington, DC 20463

RE: MUR 1704

Dear Mr. Gross:

Enclosed is my designation of counsel form for MUR 1704, sent in response to your letter of May 29. All further communication concerning this case should be sent to my designated counsel.

Cordially,

William D. Angel, Jr.
Treasurer
4th District Mondale Delegate Committee

Encl.

8504050957

RECEIVED AT THE FEC
84 JUN 7 AM : 55

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1704

NAME OF COUNSEL: James Schiller

ADDRESS: 2500 Terminal Tower
Cleveland, OH 44113

TELEPHONE: (216) 241-6602

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.

June 5, 1984
Date

Signature

RESPONDENT'S NAME: William D. Angel, Jr.

ADDRESS: 1424 Lowell
Lima, OH 45804

HOME PHONE: (419) 222-6131

BUSINESS PHONE: (419) 228-2641

8504050093 8

Angel
1424 Lowell
Lima, OH 45805



0 5 0 0 9 5 9

RETURN RECEIPT REQUESTED

Mr. Kenneth Gross
Federal Election Commission
1325 K Street, NW
Washington, DC 20463

CERTIFIED

P 527 903 319

MAIL

6cc # 3321

RECEIVED AT THE FEC

84 MAY 29 A8:48

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1667

NAME OF COUNSEL: Mr. James Schiller

ADDRESS: 2500 Terminal Tower
Cleveland, OH 44113

TELEPHONE: (216) 241-6602

MUR 1667-2 Memo

PM 10: 11

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 23, 1984
Date

Signature

8504030090

RESPONDENT'S NAME: William Angel

ADDRESS: 1424 Lowell Ave.
Lima, OH 45805

HOME PHONE: (419) 222-6131

BUSINESS PHONE: (419) 228-2641

ger
24 Lowell
na, OH 45805

PM
24 MAY
1984

84 MAY 29

85 4 3 5 0 0 9 6 1

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

RECEIVED AT THE FEC
Cert 3224
84 MAY 21 P1:34

1424 Lowell
Lima, OH 45805
May 17, 1984

MUR 1667
Memo

Mr. Charles N. Steele, General Counsel
Federal Election Commission
Washington, DC 20463

84 MAY 21 P3:32

Re: MUR 1667

Dear Mr. Steele:

In reference to your letter of May 11, I would like to make certain facts clear concerning the Fourth District Mondale Delegates Committee:

1. We formed the committee on April 18 to help elect Mondale delegates in the 4th Congressional District, Ohio.

2. The committee's objective was to raise money to defray out-of-pocket expenses associated with electing those delegates. Such expenses would have included travel reimbursements, long distance telephone charges, limited xeroxing charges, and payment for precinct voter lists.

3. As a means of raising money, the committee decided to organize a 50/50 raffle in which raffle tickets would be sold for $1.00 each and the raffle held on May 8, with the committee keeping half the proceeds and the winner taking home the remaining half.

4. On April 25, I received a telephone call from Don Campion, the state coordinator of the Ohio Mondale Campaign, recommending that I shut down the committee. At this time we had sold less than 120 tickets. I immediately instructed the committee members to stop selling the tickets. We then decided to keep the funds that had been raised to that point ($116.00), pay the bill for printing the tickets, and hold the raffle as planned but with the winner taking the entire sum, minus the money used to pay printing expenses. The drawing was held on May 8, and the winner paid.

5. At no time did the committee receive any money from Political Action Committees. All of the committee's money came in the form of small donations of $20.00 and less.

6. On May 4, I received a lettergram from the National Mondale Committee, telling me that all delegate committees' contributions and expenditures would be counted toward the national campaign. I have since been in touch with the national campaign staff and have sent them a list of contributors to the 4th District Mondale Delegates Committee.

8504009362

7. At no time did the 4th District Mondale Delegates Committee spend any money to advocate the election of Walter Mondale or the election of Mondale delegates. The only expenditures involved payment of a bill for printing raffle tickets and and payment to the winner of the raffle.

8. I am now in the process of compiling my report closing down the committee.

If there is any other information you need, please feel free to call me, either at work (419-228-2641) or at home (419-222-6131).

Cordially,

William B. Angel, Jr.
Treasurer
Fourth District Mondale Delegates Committee

8504005093

Angel
1424 Lowell
Lima, OH 45805

LIMA, OH 458
PM
17 MAY
1984

ALMA, GA
MAY 21
ZIP CODE 31

0964

RETURN RECEIPT
REQUESTED

Mr. Charles N. Steele, General Counsel
Federal Elections Commission
Washington, DC 20463

CERTIFIED

LP 527 903 248

MAIL

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

William D. Angel, Jr., Treasurer
4th District Mondale Delegate
Committee
1424 Lowell
Lima, OH 45805

Re: MUR 1667

Dear Mr. Angel:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

8504009063

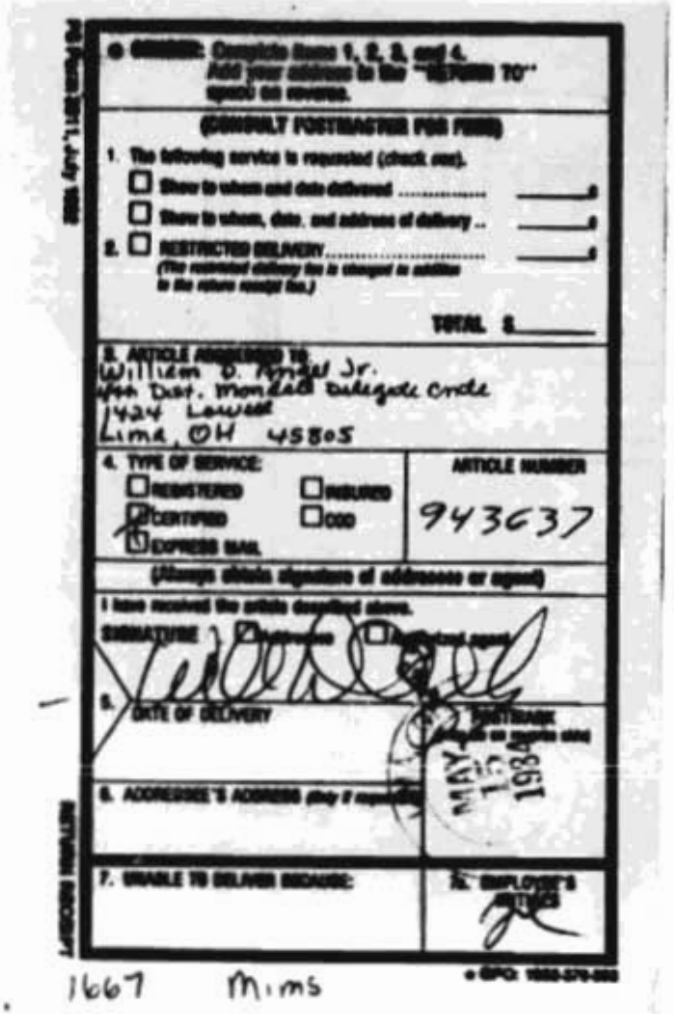
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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



1667 Mims

RECEIVED BY THE FEC
84 JUN 12 P12:47

6&#3575

PETER W. SWENTY
ATTORNEY AND COUNSELOR AT LAW
SUITE 607 TERRACE HILTON BUILDING
15 WEST SIXTH STREET
CINCINNATI, OHIO 45202
PHONE (513) 241-7522

ASSOCIATES
JOHN A. WIETHE
H. THOMAS BROWN
MARVIN H. KOLSTEIN
RICHARD E. LIPPERT
JOHN H. INGLE
JAMES W. LIPPERT
MICHAEL J. WIETHE
BARBARA R. WIETHE
DOUGLAS C. PRINCE

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

June 7, 1984

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

RE: MUR 1704

Dear Mr. Steele:

In behalf of the First and Second Districts of Ohio Delegates for Mondale Committee, I am enclosing herewith the following documents:

1. Statement of Designation of Counsel

2. Response to the Complaint

If there is any further information that you require, please advise me accordingly.

Very truly yours,

Peter W. Swenty

Peter W. Swenty

PWS/baf
Enc.

8504050967

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1704

NAME OF COUNSEL: Peter W. Swenty

ADDRESS: 607 Terrace Hilton Bldg.
15 W. 6th St.
Cincinnati, OH 45202

TELEPHONE: 513/241-7332

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.

6/7/84
Date

Peter W. Swenty
Signature

RESPONDENT'S NAME: First and Second Districts of Ohio Delegates for Mondale Committee
c/o Peter W. Swenty, Treasurer

ADDRESS: 607 Terrace Hilton Bldg.
15 W. 6th St.
Cincinnati, Ohio 45202

HOME PHONE: 513/381-0204

BUSINESS PHONE: 513/241-7332

8504050096 8

BEFORE THE
FEDERAL ELECTION COMMISSION

THE NATIONAL RIGHT TO WORK COMMITTEE	:	MUR 1704
and	:	
RALPH MARTIN (BUD) HETTINGA, JR.,	:	
Complainants	:	RESPONSE OF FIRST AND SECOND DISTRICTS OF OHIO
-vs-	:	DELEGATES FOR MONDALE COMMITTEE
WALTER F. MONDALE AND MONDALE FOR PRESIDENT CAMPAIGN COMMITTEE, ET AL,	:	FEC ID #C00182337
Respondents	:	

In response to the Complaint filed herein, the First and Second Districts of Ohio Delegates for Mondale Committee attach hereto and incorporate herein by reference a copy of the Response previously filed in No. MUR 1667.

Additionally, I would like to point out that the First and Second Districts Delegates for Mondale Committee does not appear in the Schedule of Contributions listed in the Complaint in this case.

Accordingly, we request that the Commission issue a letter finding this Delegates Committee not to be in violation.

Peter W. Swenty

Peter W. Swenty
607 Terrace Hilton Bldg.
15 W. 6th St.
Cincinnati, OH 45202
513/241-7332
Attorney for First & Second Districts
of Ohio Delegates for Mondale Committee

8504050096 9

BEFORE THE FEDERAL ELECTION COMMISSION

IN THE MATTER OF THE COMPLAINT OF	:	No. MUR 1667
AMERICANS WITH HART, INC.	:	
Complainant	:	RESPONSE OF FIRST AND SECOND DISTRICTS OF OHIO DELEGATES FOR MONDALE COMMITTEE FEC ID #C00182337
- against -	:	
MONDALE FOR PRESIDENT COMMITTEE, INC.	:	
Respondent	:	

I. FACTS

In response to the Complaint filed herein, the First and Second Districts of Ohio Delegates for Mondale Committee (hereinafter referred to as "Delegates Committee") states the following facts:

1. The Delegates Committee was organized on April 3, 1984 for the purpose of promoting the candidacy in the Ohio Primary on May 8, 1984 of those delegates pledged to Walter F. Mondale who were elected in the caucuses held on February 9, 1984 in the First and Second Congressional Districts of Ohio.

2. From April 6, 1984 through May 5, 1984 the Committee received contributions totalling $1,820.00 from 30 different individuals ranging in amounts from $5.00 to $250.00. (See Form 3X submitted herewith)

3. To the date of this Response, the Delegates Committee spent $1,745.65 leaving a current balance of $74.35. (See Form 3X submitted herewith)

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4. The Delegates Committee rented office space at 2031 Madison Road, Cincinnati, Ohio and had telephones installed for its use until about April 28, 1984 when the Mondale For President Committee took over the headquarters. The Delegates Committee vacated the premises, cut off the telephone service and discontinued the use of that headquarters for the balance of the Primary campaign.

5. From April 28, 1984 through May 8, 1984 the Delegates Committee operated out of the homes of various delegate candidates and other persons associated with the committee.

6. The activities of the Delegates Committee consisted primarily of making telephone calls and sending letters in behalf of the delegate candidates. A copy of one such letter is attached hereto, marked Exhibit a, and incorporated herein by reference.

II. ARGUMENT

It is submitted that the Delegates Committee was an independent committee formed solely to promote the candidacy of the Mondale delegates of the First and Second Congressional Districts of Ohio and was not "affiliated" in any way with the Mondale For President Committee, Inc.

In support of this statement, we submit the following:

1. All actions and expenditures of the Delegates Committee were made as a result of the decisions made by members of that Committee without any aid or direction from members of the Mondale for President Committee, Inc.

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2. The Delegates Committee received no money from any Political Action Committee.

3. By making a contribution to the Delegates Committee, no contributor exceeded the $1,000.00 personal contribution limit.

4. The Delegates Committee had no contact with any other delegates committee in the State of Ohio or in any other state.

5. Seven of the 30 contributors to the Delegates Committee were delegate or alternate candidates and contributed to the committee in order to enhance their own candidacy.

III. CONCLUSION

It is respectfully submitted that this Delegates Committee did not violate any sections of the Federal Election Campaign Act of 1971 since the Committee was not "affiliated" with the Mondale For President Committee, Inc. and all of its expenditures were of an independent nature falling within the phrase as defined by the Federal Election Commission's regulation:

> "(a) 'Independent expenditure' means 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."
> 11 C.F.R. § 109.1(a) (Emphasis added)

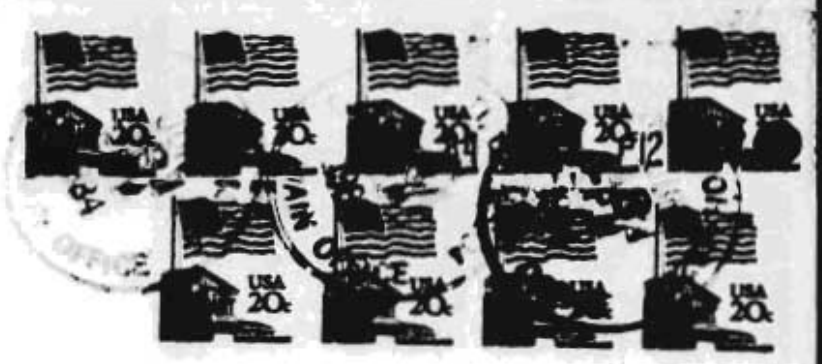
Accordingly, we request that the Commission issue a letter finding this Delegates Committee not to be in violation.

Peter W. Swenty

Peter W. Swenty
607 Terrace Hilton Building
15 W. 6th St.
Cincinnati, OH 45202; 513/241-7332
-3-Attorney for First & Second Districts
of Ohio Delegates for Mondale Committee

8504050972

ER W. SWENTY
ATTORNEY AND COUNSELOR AT LAW
• SUITE 607 TERRACE HILTON BLDG.
• 15 WEST SIXTH STREET
• CINCINNATI, OHIO 45202



CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Charles N. Steele
General Counsel
Federal Election Commission
Washington, DC 20463

CERTIFIED
P 446 479 068
MAIL

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1704

NAME OF COUNSEL: Peter W. Swenty

ADDRESS: 607 Terrace Hilton Bldg.
15 W. 6th St.
Cincinnati, OH 45202

TELEPHONE: 513/241-7332

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.

6/7/84
Date

Peter W. Swenty
Signature

RESPONDENT'S NAME: First and Second Districts of Ohio Delegates for Mondale Committee
c/o Peter W. Swenty, Treasurer

ADDRESS: 607 Terrace Hilton Bldg.
15 W. 6th St.
Cincinnati, Ohio 45202

HOME PHONE: 513/381-0204

BUSINESS PHONE: 513/241-7332

8504050097 4

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1704

NAME OF COUNSEL: Peter W. Swenty

ADDRESS: 607 Terrace Hilton Bldg.
15 W. 6th St.
Cincinnati, OH 45202

TELEPHONE: 513/241-7332

Treasurer

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.

6/7/84
Date

Peter W. Swenty
Signature

RESPONDENT'S NAME: First and Second Districts of Ohio Delegates for Mondale Committee
c/o Peter W. Swenty, Treasurer

ADDRESS: 607 Terrace Hilton Bldg.
15 W. 6th St.
Cincinnati, Ohio 45202

HOME PHONE: 513/381-0204

BUSINESS PHONE: 513/241-7332

8504050975

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84 MAY 29 P1:06

ASSOCIATES
JOHN A. WIETHE
E. THOMAS BROWN
MARVIN N. EOLSTEIN
RICHARD E. LIPPERT
JOHN E. ENGLE
JAMES W. LIPPERT
MICHAEL J. WIETHE
BARBARA E. WIETHE
DOUGLAS C. PRINCE

PETER W. SWENTY
ATTORNEY AND COUNSELOR AT LAW
SUITE 607 TERRACE HILTON BUILDING
16 WEST SIXTH STREET
CINCINNATI, OHIO 45202
PHONE (513) 241-7222

May 25, 1984

84 MAY 29 A4:40

MUR 1667

Charles N. Steele
General Counsel
Federal Election Commission
Washington, DC 20463

RE: MUR 1667

Dear Mr. Steele:

In behalf of the First and Second Districts of Ohio Delegates for Mondale Committee I am enclosing herewith the following documents:

1. Statement of Designation of Counsel

2. FEC Form 3X

3. Response to the Complaint

If there is any further information that you require, please advise me accordingly.

Very truly yours,

Peter W. Swenty

Peter W. Swenty

PWS/baf
Enc.

8 5 0 4 0 0 3 5 0 0 9 7 6

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1667

NAME OF COUNSEL: Peter W. Swenty

ADDRESS: 607 Terrace Hilton Bldg.
15 W. 6th St.
Cincinnati, OH 45202

TELEPHONE: 513/241-7332

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 25, 1984
Date

Peter W. Swenty
Signature Peter W. Swenty, Treasurer

RESPONDENT'S NAME: First and Second Districts of Ohio Delegates for Mondale Committee
c/o Peter W. Swenty, Treasurer

ADDRESS: 607 Terrace Hilton Bldg.
15 W. 6th St.
Cincinnati, OH 45202

HOME PHONE: 513/381-0204

BUSINESS PHONE: 513/241-7332

8504050097

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

(Summary Page)

ALIGN AREA | ALIGN AREA

1. Name of Committee (In Full)
First and Second Districts of Ohio Delegates for Mondale Committee

Address (Number and Street)
c/o Peter W. Swenty, Treasurer
607 Terrace Hilton Bldg.
15 W. 6th St.

City, State and ZIP Code
Cincinnati, OH 45202

☐ Check here if address is different than previously reported.

2. FEC Identification Number
C00182337

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

4. TYPE OF REPORT (Check appropriate boxes)

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

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

850400500978

SUMMARY	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period April 3, 1984 through May 24, 1984		
6. (a) Cash on hand January 1, 19____		$ -0-
(b) Cash on Hand at Beginning of Reporting Period	$ -0-	
(c) Total Receipts (from Line 18)	$ 1,820.00	$
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$	$
7. Total Disbursements (from Line 28)	$ 1,745.65	$
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 74.35	$
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)	$	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	$ Unknown	

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

Peter W. Swenty
Type or Print Name of Treasurer

Peter W. Swenty
SIGNATURE OF TREASURER

5/25/84
Date

For further information contact:
Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4068

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

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

									FEC FORM 3X (3/80)

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

Name of Committee (In Full)	Report Covering the Period	
First and Second Districts of Ohio Delegates for Mondale Committee	From: 4/3/84	To: 5/24/84
	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date
I. RECEIPTS		
11. CONTRIBUTIONS (other than loans) FROM:		
(a) Individuals/Persons Other Than Political Committees	1,820.00	11(a)
(Memo Entry Unitemized $_____)		
(b) Political Party Committees		11(b)
(c) Other Political Committees		11(c)
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c))		11(d)
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES		12
13. ALL LOANS RECEIVED		13
14. LOAN REPAYMENTS RECEIVED		14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)		15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		16
17. OTHER RECEIPTS (Dividends, Interest, etc.)		17
18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)	1,820.00	18
II. DISBURSEMENTS		
19. OPERATING EXPENDITURES		19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES		20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		21
22. INDEPENDENT EXPENDITURES (use Schedule E)	1,745.65	22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. § 441 a(d)) (Use Schedule F)		23
24. LOAN REPAYMENTS MADE		24
25. LOANS MADE		25
26. REFUNDS OF CONTRIBUTIONS TO		
(a) Individuals/Persons Other Than Political Committees		26(a)
(b) Political Party Committees		26(b)
(c) Other Political Committees		26(c)
(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))		26(d)
27. OTHER DISBURSEMENTS		27
28. TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	1,745.65	28
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES		
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)		29
30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)		30
31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)		31
32. TOTAL OPERATING EXPENDITURES from Line 19		32
33. OFFSETS TO OPERATING EXPENDITURES from Line 15		33
34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)		34

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SCHEDULE A ● **ITEMIZED RECEIPTS** ●

Page ____ of ____ for
LINE NUMBER _____
(Use separate schedule(s) for each category of the Detailed Summary Page)

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

Name of Committee (in Full)

First and Second Districts of Ohio Delegates for Mondale Committee

A. Full Name, Mailing Address and ZIP Code Peter W. Swenty 997 Hill St. Cincinnati, OH 45202 Receipt For: ■ Primary □ General □ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year) 4/6/84	Amount of Each Receipt this Period $ 50.00
B. Full Name, Mailing Address and ZIP Code Donald J. Mooney, Jr. 2729 Hyde Park Ave. Cincinnati, OH 45209 Receipt For: ☒ Primary □ General □ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year) 4/6/84	Amount of Each Receipt This Period $ 50.00
C. Full Name, Mailing Address and ZIP Code David Mann 568 Evanswood Place Cincinnati, OH 45220 Receipt For: ☒ Primary □ General □ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year) 4/6/84	Amount of Each Receipt This Period $100.00
D. Full Name, Mailing Address and ZIP Code John Anderson 2717 Johnstone Place Cincinnati, OH 45206 Receipt For: ☒ Primary □ General □ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year) 4/6/84	Amount of Each Receipt This Period $250.00
E. Full Name, Mailing Address and ZIP Code Jene Galvin 412 Old Kellogg Road Cincinnati, OH 45230 Receipt For: ☒ Primary □ General □ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year) 4/9/84	Amount of Each Receipt This Period $100.00
F. Full Name, Mailing Address and ZIP Code Judith Green 2140 Ohio Ave. Cincinnati, OH 45219 Receipt For: ☒ Primary □ General □ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year) 4/8/84	Amount of Each Receipt This Period $ 25.00
G. Full Name, Mailing Address and ZIP Code Brenda Parks 3512 Wabash Cincinnati, OH 45207 Receipt For: ☒ Primary □ General □ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year) 4/8/84	Amount of Each Receipt This Period $ 25.00
SUBTOTAL of Receipts This Page (optional)			$600.00
TOTAL This Period (last page this line number only)			

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SCHEDULE A **ITEMIZED RECEIPTS**

LINE NUMBER _____
(Use separate schedule(s) for each category of the Detailed Summary Page)

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Name of Committee (in Full)
First and Second Districts of Ohio Delegates for Mondale Committee

A. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation / Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt this Period
E. Wyona King 2670 Montana Ave. Cincinnati, OH 45211		4/7/84	$100.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):			
B. Full Name, Mailing Address and ZIP Code	**Name of Employer / Occupation / Aggregate Year-to-Date—$**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
L. Monty Erb 4530 Erie Ave. Cincinnati, OH 45227		4/7/84	$150.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):			
C. Full Name, Mailing Address and ZIP Code	**Name of Employer / Occupation / Aggregate Year-to-Date—$**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
Theodore Good 506 Riddle Road, Apt. #3 Cincinnati, OH 45220		4/7/84	$ 15.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):			
D. Full Name, Mailing Address and ZIP Code	**Name of Employer / Occupation / Aggregate Year-to-Date—$**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
Bessie Plummer 4540 Erie Ave. Cincinnati, OH 45227		4/7/84	$ 5.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):			
E. Full Name, Mailing Address and ZIP Code	**Name of Employer / Occupation / Aggregate Year-to-Date—$**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
Stephen R. Sexton 40 Cromwell Rd. Cincinnati, OH 45218		4/7/84	$ 50.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):			
F. Full Name, Mailing Address and ZIP Code	**Name of Employer / Occupation / Aggregate Year-to-Date—$**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
Ruth Keefe 3662 Kendall Ave. Cincinnati, OH 45208		4/9/84	$ 10.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):			
G. Full Name, Mailing Address and ZIP Code	**Name of Employer / Occupation / Aggregate Year-to-Date—$**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
Timothy Burke 3560 McGuffey Cincinnati, OH 45226		4/8/84	$ 25.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):			
SUBTOTAL of Receipts This Page (optional)			$355.00
TOTAL This Period (last page this line number only)			

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SCHEDULE A **ITEMIZED RECEIPTS**

Page ____ of ____ for LINE NUMBER _____.
(Use separate schedule(s) for each category of the Detailed Summary Page)

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Name of Committee (in Full)
First and Second Districts of Ohio Delegates for Mondale Committee

A. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation / Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt this Period
Steve Lawrence 5720 Winton Road, Apt. 405C Cincinnati, OH 45232 Receipt For: ☒ Primary ☐ General ☐ Other (specify):		4/9/84	$ 25.00
B. Full Name, Mailing Address and ZIP Code	**Name of Employer / Occupation / Aggregate Year-to-Date—$**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
James Lowe 63 Central Terrace Wyoming, OH 45215 Receipt For: ☒ Primary ☐ General ☐ Other (specify):		4/9/84	$ 65.00
C. Full Name, Mailing Address and ZIP Code	**Name of Employer / Occupation / Aggregate Year-to-Date—$**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
Charles Luken 2905 Montana Ave. Cincinnati, OH 45211 Receipt For: ☒ Primary ☐ General ☐ Other (specify):		4/9/84	$100.00
D. Full Name, Mailing Address and ZIP Code	**Name of Employer / Occupation / Aggregate Year-to-Date—$**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
Betty Cassady 1015 Grandin Ridge Road Cincinnati, OH 45208 Receipt For: ☒ Primary ☐ General ☐ Other (specify):		4/10/84	$ 50.00
E. Full Name, Mailing Address and ZIP Code	**Name of Employer / Occupation / Aggregate Year-to-Date—$**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
Anne Draznik 1318 Park Ridge Place Cincinnati, OH 45208 Receipt For: ☒ Primary ☐ General ☐ Other (specify):		4/10/84	$ 15.00
F. Full Name, Mailing Address and ZIP Code	**Name of Employer / Occupation / Aggregate Year-to-Date—$**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
Robin Harvey 1246 Herschel Ave. Cincinnati, OH 45208 Receipt For: ☒ Primary ☐ General ☐ Other (specify):		4/10/84	$ 50.00
G. Full Name, Mailing Address and ZIP Code	**Name of Employer / Occupation / Aggregate Year-to-Date—$**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
Richard Buchanan 2552 Madison Road, No. 51 Cincinnati, OH 45208 Receipt For: ☒ Primary ☐ General ☐ Other (specify):		4/10/84	$ 25.00
SUBTOTAL of Receipts This Page (optional)			$330.00
TOTAL This Period (last page this line number only)			

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SCHEDULE A

ITEMIZED RECEIPTS

Page ____ of ____ for LINE NUMBER _____
(Use separate schedule(s) for each category of the Detailed Summary Page)

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Name of Committee (in Full)
First and Second Districts of Ohio Delegates for Mondale Committee

A. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation / Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt this Period
Marian Spencer 940 Lexington Ave. Cincinnati, OH 45229 Receipt For: X Primary ☐ General ☐ Other (specify):		4/10/84	$100.00
B. Full Name, Mailing Address and ZIP Code	**Name of Employer / Occupation / Aggregate Year-to-Date—$**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
Mark Vanderlaan 4825 Beverly Hills Dr. Cincinnati, OH 45226 Receipt For: X Primary ☐ General ☐ Other (specify):		4/12/84	$ 25.00
C. Full Name, Mailing Address and ZIP Code	**Name of Employer / Occupation / Aggregate Year-to-Date—$**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
John Zenni 1397 Blue Orchard Drive Cincinnati, OH 45230 Receipt For: X Primary ☐ General ☐ Other (specify):		4/12/84	$ 15.00
D. Full Name, Mailing Address and ZIP Code	**Name of Employer / Occupation / Aggregate Year-to-Date—$**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
William Kathman 7132 Rosewood Cincinnati, OH 45216 Receipt For: X Primary ☐ General ☐ Other (specify):		4/12/84	$ 10.00
E. Full Name, Mailing Address and ZIP Code	**Name of Employer / Occupation / Aggregate Year-to-Date—$**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
Milton Goodstein 5691 Kugler Mill Road Cincinnati, OH 45236 Receipt For: X Primary ☐ General ☐ Other (specify):		4/13/84	$200.00
F. Full Name, Mailing Address and ZIP Code	**Name of Employer / Occupation / Aggregate Year-to-Date—$**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
Cynthia K. Mahin 3651 Heekin Ave. Cincinnati, OH 45226 Receipt For: X Primary ☐ General ☐ Other (specify):		4/17/84	$ 50.00
G. Full Name, Mailing Address and ZIP Code	**Name of Employer / Occupation / Aggregate Year-to-Date—$**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
Tom Mooney 2936 Minot, Apt. 1 Cincinnati, OH 45209 Receipt For: X Primary ☐ General ☐ Other (specify):		4/25/84	$ 50.00
SUBTOTAL of Receipts This Page (optional)			$450.00
TOTAL This Period (last page this line number only)			

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SCHEDULE A **ITEMIZED RECEIPTS**

LINE NUMBER: _____
(Use separate schedule(s) for each category of the Detailed Summary Page)

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

Name of Committee (in Full)
First and Second Districts of Ohio Delegates for Mondale Committee

A. Full Name, Mailing Address and ZIP Code Marguerite Mooney 2715 Griffiths Avenue Cincinnati, OH 45208 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year) 4/30/84	Amount of Each Receipt this Period $ 10.00
B. Full Name, Mailing Address and ZIP Code Thomas Joseph 1255 Michigan Ave. Cincinnati, OH 45208 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year) 5/5/84	Amount of Each Receipt This Period $ 75.00
C. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
D. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
E. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
F. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
G. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
SUBTOTAL of Receipts This Page (optional)			$ 85.00
TOTAL This Period (last page this line number only)			$1,820.00

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SCHEDULE D
(Revised 3/80)

DEBTS AND OBLIGATIONS
Excluding Loans

Page ____ of ____ for
LINE NUMBER ____
(Use separate schedules for each numbered line)

Name of Committee (In Full) First and Second Districts of Ohio Delegates for Mondale Committee	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor Cincinnati Gas & Electric Co. Cincinnati, OH 45201				Unknown
Nature of Debt (Purpose): Electric service				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
1) SUBTOTALS This Period This Page (optional)				
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)				

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SCHEDULE E

ITEMIZED INDEPENDENT EXPENDITURES

(See Reverse Side for Instructions)

Page ____ of ____ Pages

Name of Committee (in Full)
First and Second Districts of Ohio
Delegates for Mondale Committee

I.D. No.
C00182337

Full Name, Mailing Address & ZIP Code of Each Payee	Purpose of Expenditure	Date (month, day, year)	Amount	Name of Federal Candidate supported or opposed by the expenditure & office sought
Cincinnati Bell Telephone Co. 201 E. 4th St. Cincinnati, OH 45201	Telephone service	4/10/84	$787.70	☐ Support ☐ Oppose
Thomas Joseph 1255 Michigan Ave. Cincinnati, OH 45208	Rent	4/10/84	$200.00	☐ Support ☐ Oppose
L. Monty Erb 4530 Erie Ave. Cincinnati, OH 45227	Locksmith Services	4/30/84	$ 29.90	☐ Support ☐ Oppose
Paxton & Seasongood 1700 Central Trust Tower Cincinnati, OH 45202	Duplicating	5/1/84	$ 55.20	☐ Support ☐ Oppose
John A. Wiethe 607 Terrace Hilton Bldg. 15 W. 6th St. Cincinnati, OH 45202	Duplicating	5/10/84	$ 70.00	☐ Support ☐ Oppose
Donald Mooney, Jr. 2729 Hyde Park Ave. Cincinnati, OH 45209	Envelopes	4/11/84	$ 44.85	☐ Support ☐ Oppose

(a) SUBTOTAL of Itemized Independent Expenditures	$_____	
(b) SUBTOTAL of Unitemized Independent Expenditures	$_____	
(c) TOTAL Independent Expenditures		$_____

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, concert with, or at the request or suggestion of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures did not involve the financing of dissemination, distribution, or republication in whole or in part of any campaign materials prepared by the candidate, his campaign committee, or their agent.

_____ _____
Signature Date

Subscribed and sworn to before me this _____ day of _____, 19____

My Commission expires

_____ _____
NOTARY PUBLIC

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SCHEDULE E

ITEMIZED INDEPENDENT EXPENDITURES

(See Reverse Side for Instructions)

Page ____ of ____ Pages

Name of Committee (in Full)	I.D. No.
First and Second Districts of Ohio Delegates for Mondale Committee	C00182337

Full Name, Mailing Address & ZIP Code of Each Payee	Purpose of Expenditure	Date (month, day, year)	Amount	Name of Federal Candidate supported or opposed by the expenditure & office sought
U.S. Post Office Fountain Square Fifth & Walnut Streets Cincinnati, OH 45202	Postage	4/18/84	$558.00	☐ Support ☐ Oppose
				☐ Support ☐ Oppose
				☐ Support ☐ Oppose
				☐ Support ☐ Oppose
				☐ Support ☐ Oppose
				☐ Support ☐ Oppose

(a) SUBTOTAL of Itemized Independent Expenditures	$ 1,745.65	
(b) SUBTOTAL of Unitemized Independent Expenditures	$	
(c) TOTAL Independent Expenditures		$ 1,745.65

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, concert with, or at the request or suggestion of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures did not involve the financing of dissemination, distribution, or republication in whole or in part of any campaign materials prepared by the candidate, his campaign committee, or their agent.

Signature _____ Date _____

Subscribed and sworn to before me this _____ day of _____, 19____

My Commission expires _____

NOTARY PUBLIC _____

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BEFORE THE FEDERAL ELECTION COMMISSION

IN THE MATTER OF THE COMPLAINT OF	:	No. MUR 1667
AMERICANS WITH HART, INC.	:	
Complainant	:	RESPONSE OF FIRST AND SECOND DISTRICTS OF OHIO DELEGATES FOR MONDALE COMMITTEE FEC ID #C00182337
- against -	:	
MONDALE FOR PRESIDENT COMMITTEE, INC.	:	
Respondent	:	

I. FACTS

In response to the Complaint filed herein, the First and Second Districts of Ohio Delegates for Mondale Committee (hereinafter referred to as "Delegates Committee") states the following facts:

1. The Delegates Committee was organized on April 3, 1984 for the purpose of promoting the candidacy in the Ohio Primary on May 8, 1984 of those delegates pledged to Walter F. Mondale who were elected in the caucuses held on February 9, 1984 in the First and Second Congressional Districts of Ohio.

2. From April 6, 1984 through May 5, 1984 the Committee received contributions totalling $1,820.00 from 30 different individuals ranging in amounts from $5.00 to $250.00. (See Form 3X submitted herewith)

3. To the date of this Response, the Delegates Committee spent $1,745.65 leaving a current balance of $74.35. (See Form 3X submitted herewith)

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4. The Delegates Committee rented office space at 2031 Madison Road, Cincinnati, Ohio and had telephones installed for its use until about April 28, 1984 when the Mondale For President Committee took over the headquarters. The Delegates Committee vacated the premises, cut off the telephone service and discontinued the use of that headquarters for the balance of the Primary campaign.

5. From April 28, 1984 through May 8, 1984 the Delegates Committee operated out of the homes of various delegate candidates and other persons associated with the committee.

6. The activities of the Delegates Committee consisted primarily of making telephone calls and sending letters in behalf of the delegate candidates. A copy of one such letter is attached hereto, marked Exhibit a, and incorporated herein by reference.

II. ARGUMENT

It is submitted that the Delegates Committee was an independent committee formed solely to promote the candidacy of the Mondale delegates of the First and Second Congressional Districts of Ohio and was not "affiliated" in any way with the Mondale For President Committee, Inc.

In support of this statement, we submit the following:

1. All actions and expenditures of the Delegates Committee were made as a result of the decisions made by members of that Committee without any aid or direction from members of the Mondale for President Committee, Inc.

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2. The Delegates Committee received no money from any Political Action Committee.

3. By making a contribution to the Delegates Committee, no contributor exceeded the $1,000.00 personal contribution limit.

4. The Delegates Committee had no contact with any other delegates committee in the State of Ohio or in any other state.

5. Seven of the 30 contributors to the Delegates Committee were delegate or alternate candidates and contributed to the committee in order to enhance their own candidacy.

III. CONCLUSION

It is respectfully submitted that this Delegates Committee did not violate any sections of the Federal Election Campaign Act of 1971 since the Committee was not "affiliated" with the Mondale For President Committee, Inc. and all of its expenditures were of an independent nature falling within the phrase as defined by the Federal Election Commission's regulation:

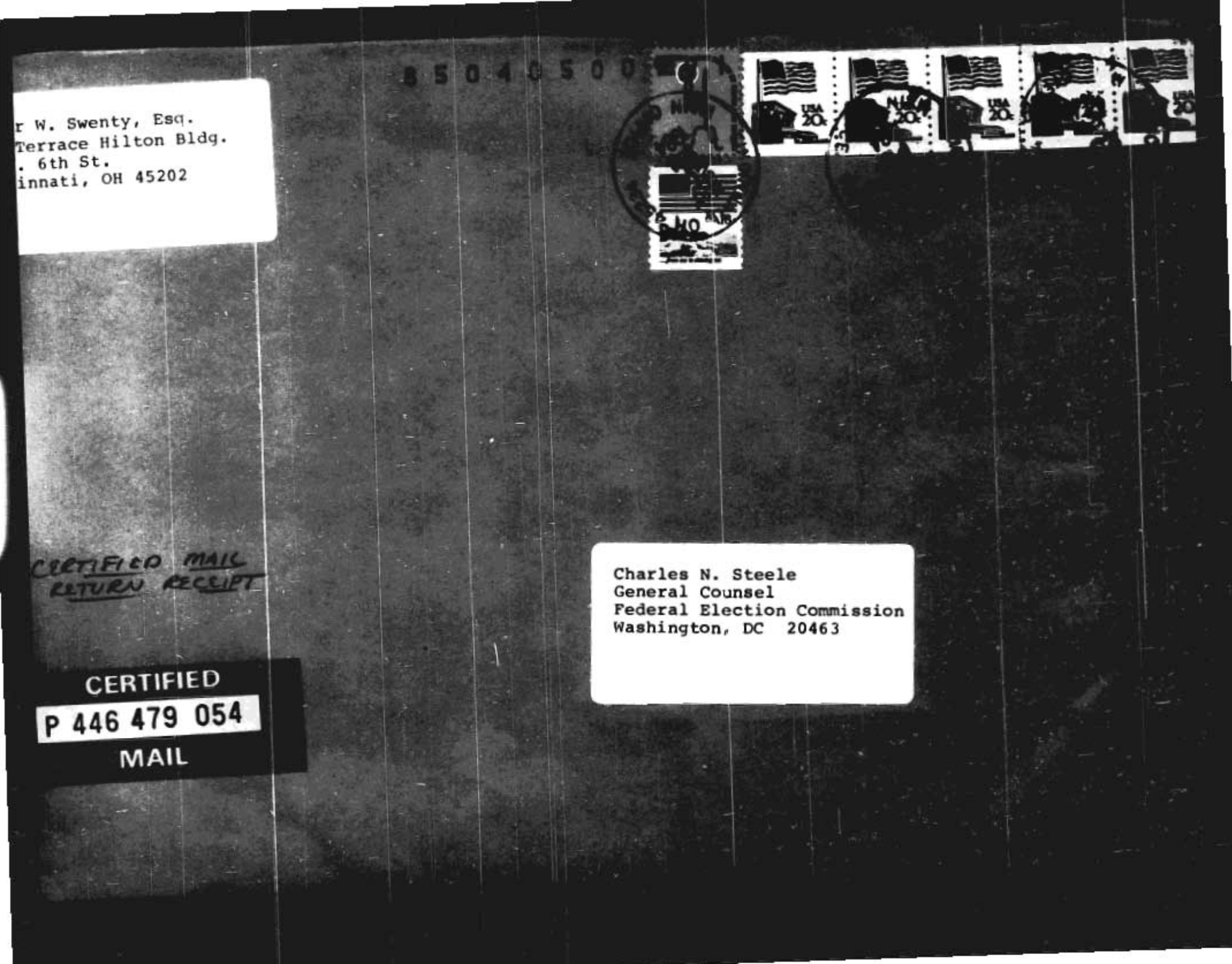
> "(a) 'Independent expenditure' means an expenditure by a person for a communication expressly advocating the election or defeat of a clearly identified candidate which is not made with the cooperation or with the prior consent of, or in consultation with, or at the request or suggestion of, a candidate or any agent or authorized committee of such candidate."
> 11 C.F.R. § 109.1(a) (Emphasis added)

Accordingly, we request that the Commission issue a letter finding this Delegates Committee not to be in violation.

Peter W. Swenty

Peter W. Swenty
607 Terrace Hilton Building
15 W. 6th St.
Cincinnati, OH 45202; 513/241-7332
Attorney for First & Second Districts
of Ohio Delegates for Mondale Committee

8504050090


r W. Swenty, Esq.
Terrace Hilton Bldg.
. 6th St.
innati, OH 45202
CERTIFIED MAIL
RETURN RECEIPT
CERTIFIED
P 446 479 054
MAIL
Charles N. Steele
General Counsel
Federal Election Commission
Washington, DC 20463

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1667

NAME OF COUNSEL: Peter W. Swenty

ADDRESS: 607 Terrace Hilton Bldg.
15 W. 6th St.
Cincinnati, OH 45202

TELEPHONE: 513/241-7332

1st District

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 25, 1984
Date

Peter W. Swenty
Signature Peter W. Swenty, Treasurer

RESPONDENT'S NAME: First and Second Districts of Ohio Delegates for Mondale Committee
c/o Peter W. Swenty, Treasurer

ADDRESS: 607 Terrace Hilton Bldg.
15 W. 6th St.
Cincinnati, OH 45202

HOME PHONE: 513/381-0204

BUSINESS PHONE: 513/241-7332

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STATEMENT OF DESIGNATION OF COUNSEL

2nd Dist

MUR 1667

NAME OF COUNSEL: Peter W. Swenty

ADDRESS: 607 Terrace Hilton Bldg.
15 W. 6th St.
Cincinnati, OH 45202

TELEPHONE: 513/241-7332

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 25, 1984
Date

Peter W. Swenty
Signature Peter W. Swenty, Treasurer

RESPONDENT'S NAME: First and Second Districts of Ohio Delegates for Mondale Committee
c/o Peter W. Swenty, Treasurer

ADDRESS: 607 Terrace Hilton Bldg.
15 W. 6th St.
Cincinnati, OH 45202

HOME PHONE: 513/381-0204

BUSINESS PHONE: 513/241-7332

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Peter W. Swenty, Treasurer
1st and 2nd District Delegates
for Mondale
607 Terrace Hilton
15 West 6th Street
Cincinnati, OH 45202

Re: MUR 1667

Dear Mr. Swenty:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

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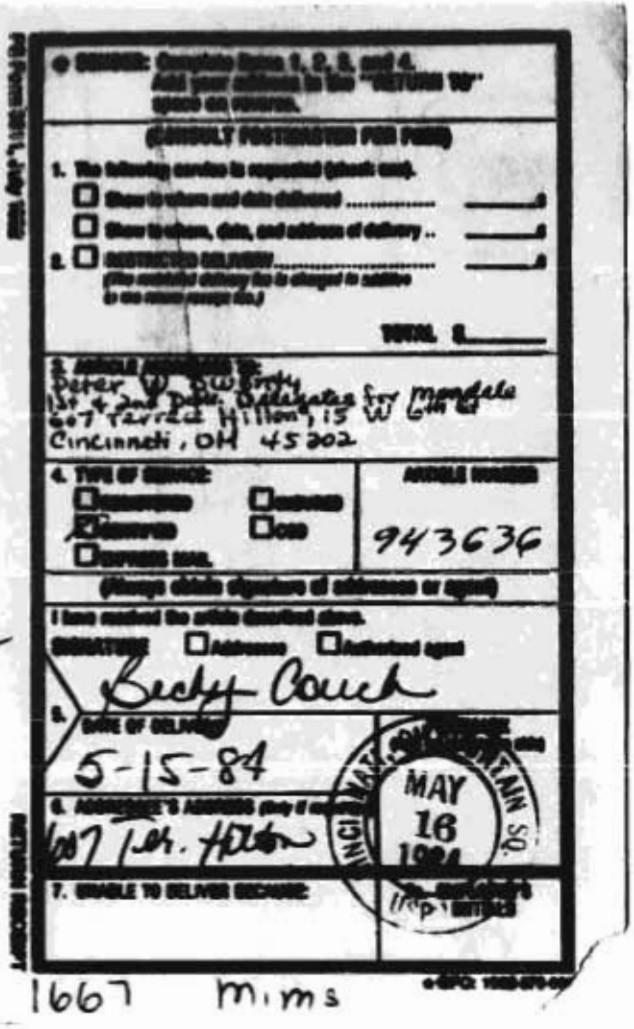
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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



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ECA 3836
RECEIVED BY THE FEC

STEPTOE & JOHNSON
CHARTERED
1250 CONNECTICUT AVENUE
WASHINGTON, D. C. 20036
(202) 862-2000
TELEX 89-2503
WRITER'S DIRECT DIAL NUMBER

84 JUN 27 P12:14
84 JUN 27 P1:55

June 26, 1984

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

Re: MUR 1667 and 1704

Dear Mr. Steele:

Enclosed are two affidavits signed by Nicholas Spaeth to accompany his previously forwarded responses to two complaints filed with the Federal Election Commission. One affidavit is to accompany his response dated May 25, 1984 to MUR 1667 regarding the complaint of Americans with Hart, Inc. The second affidavit is to accompany his response dated June 14, 1984 to MUR 1704 regarding the complaint filed by the National Right to Work Committee and Mr. Martin Hettinger, Jr.

These affidavits complete Mr. Spaeth's response to these two complaints. If there is any additional information which you require or which would be of assistance, please let me know.

Sincerely,

Jeanne Connelly

Jeanne Connelly
Attorney for Nicholas Spaeth

JC/ccm

Enclosures

8504050096

BEFORE THE
FEDERAL ELECTION COMMISSION

The National Right to Work Committee and Ralph Martin (Bud) Hettinga, Jr., Complainants, v. Walter F. Mondale and Mondale for President Campaign Committee, AFL-CIO Cope Political Contribution Committee, AFSCME Public Employees Organized to Promote Legislative Equality Qualified, American Federation of Teachers Cope, United Food and Commercial Workers Active Ballot Club, International Union of Bricklayers and Allied Craftsmen PAC, Carpenters Legislative Improvement Committee, Ironworkers Political Action League, Machinists Non-Partisan Political League, Amalgamated Clothing and Textile Workers Union PAC, CWA-COPE PCC, Service Employees International Union Cope PCC, UAW V CAP, and United Mine Workers of America Coal Miners PAC, Respondents.	MUR No.: 1704 Affidavit of Nicholas J. Spaeth

8504509097

STATE OF NORTH DAKOTA)
) ss
COUNTY OF CASS)

Nicholas J. Spaeth, first being sworn, states as follows:

1. I am the individual listed as the Treasurer of the North Dakota Delegates for Mondale Committee on the Complaint filed with the Federal Election Commission.

2. The Complaint comes as some surprise to me for I was not aware that an organization called the North Dakota Delegates for Mondale Committee existed.

3. A few individuals worked together in North Dakota on an informal basis to secure as many convention delegates as possible for Vice-President Mondale. In addition, a few of us desired to become national delegates and thus made individual efforts on our own behalf. In connection with our efforts, I contacted the Mondale for President Headquarters in Washington occasionally for information, but these contacts were minimal and entirely by telephone. At no point in the course of the campaign did anyone connected with the Mondale campaign even visit the State of North Dakota.

4. At no point was a formal committee formed in any sense. At some point during the campaign a $300 check was received by me from a Mondale supporter in Montana who knew of me. I turned that money over to Mr. Gorman King, another Mondale supporter who desired to be a national convention delegate. He then used the money to hire someone to make long distance telephone calls to delegates at the State Convention. The purpose of these calls

8 0 4 0 5 0 0 9 9 8

was to enhance our chances to be selected as national convention delegates by securing more votes for the Mondale caucus.

5. At no point were we under the direction, guidance, or authority of the Mondale for President Committee. They did not know what we used this money for nor did they have any role whatsoever in our efforts to get ourselves elected as delegates to the national convention.

6. To repeat, there was no such thing as a Mondale Delegate Committee formed. Our individual activities on behalf of Mr. Mondale were designed to get ourselves elected as delegates and were entirely independent of the national campaign. We spent only $300 in our efforts to become elected as delegates and this expenditure was entirely independent of the Mondale campaign.

Dated: June 22, 1984.

Nicholas J. Spaeth

Nicholas J. Spaeth

Subscribed and sworn to before me this 22nd day of June, 1984.

(SEAL)

Sheila M. Hilgers

Sheila M. Hilgers, Notary Public
County of Cass, State of No. Dak.
My Commission Expires: 8/22/89

8504000999

FIRST CLASS FIRST CLASS

8 5 0 0 1 0 0

TOE & JOHNSON
CHARTERED
ONNECTICUT AVENUE
NGTON, D. C. 20036

84 JUN 27 13

FIRST CLASS MAIL

STEPTOE & JOHNSON
CHARTERED
1250 CONNECTICUT AVE., N. W.
WASHINGTON, D. C. 20036

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

GCC#3621

STEPTOE & JOHNSON
CHARTERED
1250 CONNECTICUT AVENUE
WASHINGTON, D. C. 20036
(202) 862-2000
TELEX 89-2503
WRITER'S DIRECT DIAL NUMBER

June 14, 1984

HAND DELIVERED

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

Re: MUR 1704

Dear Mr. Steele:

This letter constitutes the response of Nicholas Spaeth to the complaint filed with the Federal Election Commission (FEC) on May 18, 1984 by the National Right to Work Committee and Ralph Martin (Bud) Hettinga, Jr.

First, although your letter notifying Mr. Spaeth of this complaint is directed to "Nicholas Spaeth, Treasurer, North Dakota Delegates for Mondale Committee," and it alleges that both Mr. Spaeth and the "Committee" may have violated the Federal Election Campaign Act of 1971 (the Act), you should know that there is no such group or organization as the "North Dakota Delegates for Mondale Committee" or any other similar entity. As is obvious from the above, Mr. Spaeth is not the "Treasurer" of any such non-existent committee.

Second, the complaint itself makes no mention of a North Dakota Delegates for Mondale Committee, no mention of Mr. Spaeth, nor does it even contain any allegations relating to North Dakota in general. There is not a single allegation of fact or law in in the complaint to support a finding that the Act may have been violated by Mr. Spaeth.

In light of the above, it should not be necessary to respond any further to this vague and unsubstantiated complaint. However, to provide the FEC with as complete a record as possible, I

9504053001

ask that you incorporate in this response, Mr. Spaeth's full response to MUR 1667, dated May 25, 1984, which clarifies that the facts concerning Mr. Spaeth's activities in North Dakota do not provide any basis for a finding of a violation of the Act.

Mr. Spaeth will be submitting a statement of the facts contained in his response, taken under oath, to accompany his responses to MUR 1667 and MUR 1704. This document will follow within several days.

For the reasons set forth in this response and those incorporated by reference to the response to MUR 1667, the Federal Election Commission should find no reason to believe a violation of the Act has occurred.

Respectfully submitted,

Jeanne Connelly

Jeanne Connelly
Attorney for Nicholas Spaeth

JC/ccm

8504050100 2

GCC#2621

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1704

NAME OF COUNSEL: Jeanne Connelly

ADDRESS: Steptoe & Johnson
1250 Connecticut Avenue NW
Washington, DC 20036

TELEPHONE: (202) 862-2277

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.

6/11/84
Date

Nicholas J Spaeth
Signature

RESPONDENT'S NAME: Nicholas J. Spaeth

ADDRESS: 502 First Avenue North
P.O. Box 1389
Fargo, ND 58107

HOME PHONE: (701) 232-8749

BUSINESS PHONE: (701) 237-6983

8304050003

STEPTOE & JOHNSON
CHARTERED
1250 CONNECTICUT AVENUE
WASHINGTON, D.C. 20036
(202) 862-2000
TELEX 89-2503
WRITER'S DIRECT DIAL NUMBER

RECEIVED BY THE FEC
1984 JUN 27 P1:56
P12:1

June 26, 1984

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

Re: MUR 1667 and 1704

Dear Mr. Steele:

Enclosed are two affidavits signed by Nicholas Spaeth to accompany his previously forwarded responses to two complaints filed with the Federal Election Commission. One affidavit is to accompany his response dated May 25, 1984 to MUR 1667 regarding the complaint of Americans with Hart, Inc. The second affidavit is to accompany his response dated June 14, 1984 to MUR 1704 regarding the complaint filed by the National Right to Work Committee and Mr. Martin Hettinger, Jr.

These affidavits complete Mr. Spaeth's response to these two complaints. If there is any additional information which you require or which would be of assistance, please let me know.

Sincerely,

Jeanne Connelly

Jeanne Connelly
Attorney for Nicholas Spaeth

JC/ccm

Enclosures

8504050004

BEFORE THE FEDERAL ELECTION COMMITTEE

In the Matter of the Complaint of Americans With Hart, Inc., Complainant, against Mondale For President Committee, Inc., Respondent.	MUR No.: 1667 Affidavit of Nicholas J. Spaeth

STATE OF NORTH DAKOTA)
) ss
COUNTY OF CASS)

Nicholas J. Spaeth, first being sworn, states as follows:

1. I am the individual listed as the Treasurer of the North Dakota Delegates for Mondale Committee on the Complaint filed with the Federal Election Commission.

2. The Complaint comes as some surprise to me for I was not aware that an organization called the North Dakota Delegates for Mondale Committee existed.

3. A few individuals worked together in North Dakota on an informal basis to secure as many convention delegates as possible for Vice-President Mondale. In addition, a few of us desired to become national delegates and thus made individual efforts on our own behalf. In connection with our efforts, I contacted the Mondale for President Headquarters in Washington occasionally for information, but these contacts were minimal and entirely by telephone. At no point in the course of the campaign did anyone connected with the Mondale campaign even visit the State of North Dakota.

8504050095

4. At no point was a formal committee formed in any sense. At some point during the campaign a $300 check was received by me from a Mondale supporter in Montana who knew of me. I turned that money over to Mr. Gorman King, another Mondale supporter who desired to be a national convention delegate. He then used the money to hire someone to make long distance telephone calls to delegates at the State Convention. The purpose of these calls was to enhance our chances to be selected as national convention delegates by securing more votes for the Mondale caucus.

5. At no point were we under the direction, guidance, or authority of the Mondale for President Committee. They did not know what we used this money for nor did they have any role whatsoever in our efforts to get ourselves elected as delegates to the national convention.

6. To repeat, there was no such thing as a Mondale Delegate Committee formed. Our individual activities on behalf of Mr. Mondale were designed to get ourselves elected as delegates and were entirely independent of the national campaign. We spent only $300 in our efforts to become elected as delegates and this expenditure was entirely independent of the Mondale campaign.

Dated: June 22, 1984.

Nicholas J. Spaeth

Nicholas J. Spaeth

Subscribed and sworn to before me this 22nd day of June, 1984.

(SEAL)

Sheila M. Hilgers

Sheila M. Hilgers, Notary Public
County of Cass, State of No. Dak.
My Commission Expires: 8/22/89

8040500106

6044 3359

STEPTOE & JOHNSON
CHARTERED
1250 CONNECTICUT AVENUE
WASHINGTON, D. C. 20036
(202) 862-2000
TELEX: 89-2503

WRITER'S DIRECT DIAL NUMBER
(202) 862-2277

May 25, 1984

MUR 1667
Memo

HAND DELIVERED

Charles N. Steele, Esquire
General Counsel
Federal Election Commission
Washington, D.C. 20463

84 MAY 25 A5:22

Re: MUR 1667

Dear Mr. Steele:

This letter constitutes the response of Nicholas Spaeth to the complaint filed with the Federal Election Commission (FEC or Commission) on April 6, 1984 by Americans with Hart, Inc.

At the outset, I wish to protest the Commission's failure to grant, or even to respond to, my request on benalf of Mr. Spaeth for an extension of time in which to answer this complaint. Mr. Spaeth resides in Fargo, North Dakota and was traveling extensively throughout the state last week on employment-related matters. The distance and his schedule made it extremely difficult for us to fully communicate about the FEC complaint during this time and the short deadline prevented me from sending a draft of this response to Mr. Spaeth prior to our filing the formal answer. The Commission's failure to grant even a brief extension of time seriously interfered with

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my ability to provide Mr. Spaeth with full and adequate legal representation.

Turning to the gravamen of the complaint, let me point out that although your letter notifying Mr. Spaeth of the Hart complaint was directed to Mr. Spaeth as Treasurer of the "North Dakota Delegates for Mondale Committee" and it alleges that both Mr. Spaeth and the "Committee" may have violated the Federal Election Campaign Act of 1971 (the Act), there is no such group or organization as the "North Dakota Delegates for Mondale Committee" or any other similar entity.

The Hart complaint makes no specific reference to Mr. Spaeth and only one specific reference to North Dakota. The allegation referring to North Dakota is that a Montana committee sent $300 to the North Dakota Delegates for Mondale Committee.[1/] This is an inaccurate statement as no such committee exists. In addition to this specific reference, the Hart complaint makes only broad and unsubstantiated allegations about the delegate committees in general. This provides little or no guidance to Mr. Spaeth as to what facts are being relied upon to support any allegation that the Act may have been violated by him.

Putting aside the issue of the vagueness of the complaint, nowever, there are no facts, relating to Mr. Spaeth or to any other North Dakota delegates with whom he was in

---

1/ Complaint of Americans with Hart, Inc. v. Mondale for President Committee, Inc., addition dated April 27, 1984, p. 7.

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communication, that could form the basis for a finding of a violation of the Act. As will be explained in further detail below, Mr. Spaeth and his associates were not a political committee within the meaning of the Act, the funds received by Mr. Spaeth were expended solely to encourage the selection of certain delegates to the national convention, and neither Mr. Spaeth nor the other North Dakota delegates with whom he conferred could be considered "affiliated" with political committees because they were not a "political committee" in the first instance.

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Relevant Facts Concerning North Dakota Delegates

Mr. Spaeth was a candidate to be a delegate to the Democratic National Convention. He attended the state convention in North Dakota but was not ultimately selected as one of the delegates to the national convention. Mr. Spaeth supports Mr. Mondale for President and he communicated informally with several other delegate-candidates in North Dakota who supported Mr. Mondale. However, these individuals never formed an organization or joined any officially recognized group that could be considered a delegate committee or a political committee.

Prior to the state convention, Mr. Spaeth received a check in the amount of $300.00 donated by an individual in Montana. This cneck was sent to Mr. Spaetn by a Montana delegate committee supporting Mondale. It was Mr. Spaeth's understanding that it was appropriate to use these funds to advocate

the selection of himself, and other delegate-candidates who supported Mr. Mondale, to the national convention.

Mr. Spaeth turned the $300.00 over to another delegate-candidate, Mr. Gorman King, who utilized the funds for long-distance phone calls to other delegate-candidates to the state convention. The process for selecting delegates in North Dakota is that, at the state convention, a ballot on the presidential candidates is held, with votes being cast by all of the delegate-candidates attending the convention. The number of Mondale delegates to be sent from North Dakota to the national convention is determined on a proportionate basis to the number of votes cast for Mr. Mondale. The likelihood of any individual delegate-candidate who supports Mondale being chosen as a delegate to the national convention depends to a large extent on the number of votes cast for Mondale.

The entire $300.00 contribution sent to Mr. Spaeth was used by an agent of Mr. King to contact delegate-candidates to the state convention and urge them to vote for Mr. Mondale. The purpose of these communications was to enhance the likelihood that Mr. Spaeth, Mr. King, and the several other delegate-candidates with whom they were in touch, would be selected as delegates to the national convention.

Mr. Spaeth acted at all times as an individual; he is not and never was a Treasurer or otherwise an agent for any delegate committee. He also did not act on behalf of or at the direction of tne Mondale for President Campaign.

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North Dakota Delegates Who Supported Mondale Were Not A "Political Committee"

The FEC has no jurisdiction over Mr. Spaeth or any other North Dakota delegates with whom he may have been in communication because neither he, nor they as a group, are a political committee within the meaning of the Act. 2 U.S.C. 431 and 11 C.F.R. § 100.5.[2/] To fall within the definition of a "political committee," a group must meet one of the four conditions listed in 11 C.F.R. § 100.5. Three of the four categories -- separate segregated fund, local committee of a political party, and principal campaign committee -- clearly have no application to Mr. Spaeth or the other delegate-candidates with whom he may have conferred. The fourth category includes any "group of persons which receives contributions aggregating in excess of $1,000 or which makes expenditures aggregating in excess of $1,000 during a calendar year." 11 C.F.R. § 100.5(a). Because Mr. Spaeth did not, either on behalf of himself or other persons, receive or expend funds in excess of $300.00, this category is inapplicable to him as well.[3/]

2/ An even more fundamental question exists as to whether the FEC has jurisdiction over individual delegates, but the short time deadline for this response prevents us from addressing this issue. See 11 C.F.R. § 100.3 and 100.3.

3/ Also, while the FEC regulations describe a "Delegate Committee" as one example of a political committee, 11 C.F.R. § 100.5(e)(5), such a delegate committee will not be considered a political committee subject to the Act and regulations until it meets the $1000 threshold requirement of 11 C.F.R. § 100.5(a).

It follows that if Mr. Spaeth and the other North Dakota delegates are not a political committee within the meaning of the Act, they are not subject to the registration or reporting requirements or to the expenditure or contribution limitations in the Act. 11 C.F.R. § 110.14(e). Thus, the general allegations of the Hart complaint relating to contributions to and by committees have no application to Mr. Spaeth or the other North Dakota delegates with whom he may have been in communication.

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The Expenditure By Mr. Spaeth Was Legal Under the Act

The entire $300.00 sent to Mr. Spaeth was expended on long-distance telephone calls to delegate-candidates to the state convention, which was held to choose the North Dakota delegates to the Democratic National Convention. The purpose of the calls was to advocate that the candidates vote for Mr. Mondale in the state convention ballot in order to increase the number of slots alloted to Mondale delegates to the national convention and thus to assure that Mr. Spaeth, Mr. King and other Mondale delegate-candidates would be chosen as delegates to the national convention.

The contribution sent to Mr. Spaeth is not governed by the limitations on the contributions and expenditures of delegate committees because, as set forth above, Mr. Spaeth is not associated with a political committee. 11 C.F.R. § 110.14(e). There are limitations on expenditures by

individual delegates, but the expenditure by Mr. Spaeth was completely within the bounds of such limitations. 11 C.F.R. § 110.14(d)(1) and (2). The regulations include as allowable expenditures by delegates, "the cost of any communications advocating only a delegate's selection." 11 C.F.R. § 110.14(d)(1). The phone calls at issue here fall foursquare within this provision because advocating a vote for Mondale at the state convention was the only way to advocate the selection of Mr. Spaeth, Mr. King, and others as delegates to the national convention.

Allowable expenditures also include the costs of certain campaign materials which advocate the selection of a delegate and which may also refer to a candidate for the office of President. 11 C.F.R. § 110.14(d)(2)(i). This section could encompass the telephone calls made to advocate the selection of Mondale delegates as well because they were carried out as a volunteer activity. 11 C.F.R. § 110.14(d)(2)(i)(A). The calls do not seem to be similar in any way to the items that would fall into the category of general public communications or political advertising which are subject to further limitations. 11 C.F.R. § 110.14(d)(2)(ii)(B). However, even if under some strained interpretation of the regulation, these telephone calls could be considered general public communications or political advertising, they would not be subject to the above-referenced limitations because they were not made "in cooperation, consultation or concert with, or at the request or

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suggestion of the presidential candidate, his or her authorized political committee(s), or their agents." 11 C.F.R. § 110.14(d)(2)(ii)(A)(1). The idea of the telephone calls was conceived and carried out solely by Mr. Spaeth and the other delegate-candidate in North Dakota, Mr. King, who worked with him in this effort.

Mr. Spaeth and His Associates Are Not An "Affiliated Committee"

To be considered an affiliate committee, it is necessary first to be a political committee. See 11 C.F.R. § 110.3 and § 100.5(g). Since Mr. Spaeth and his associaties in North Dakota are not, as discussed previously, a political committee within the meaning of the Act, they cannot possibly be an "affiliated committee." Thus, all of the arguments in the Hart complaint regarding the delegate committees being affiliated have no bearing on Mr. Spaeth and any possible allegations concerning him.

For the reasons set forth in this response, the Federal Election Commission should find no reason to believe a violation of the Act has occurred.

Respectfully submitted,

Jeanne Connelly

Jeanne Connelly
Attorney for Nicholas Spaeth

8504010014

STEPTOE & JOHNSON
CHARTERED
1250 CONNECTICUT AVE., N. W.
WASHINGTON, D. C. 20036

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

GCC#2621

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1704

NAME OF COUNSEL: Jeanne Connelly

ADDRESS: Steptoe & Johnson
1250 Connecticut Avenue NW
Washington, DC 20036

TELEPHONE: (202) 862-2277

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.

6/11/84
Date

Nicholas J Spaeth
Signature

RESPONDENT'S NAME: Nicholas J. Spaeth

ADDRESS: 502 First Avenue North
P.O. Box 1389
Fargo, ND 58107

HOME PHONE: (701) 232-8749

BUSINESS PHONE: (701) 237-6983

8504050105

RECEIVED AT THE FEC
84 MAY 1 A8:08

BCC #3397

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1667

MUR 1667
Mums

NAME OF COUNSEL: Jeanne Connelly

ADDRESS: Steptoe & Johnson
1250 Connecticut Avenue NW
Washington, D.C. 20036

TELEPHONE: (202) 862-2277

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.

5/21/84
Date

Nicholas J Spaeth
Signature

RESPONDENT'S NAME: Nicholas Spaeth

ADDRESS: First Avenue North at Fifth St.
P.O. Box 1389
Fargo, North Dakota 58107

HOME PHONE: (701) 232-8749

BUSINESS PHONE: (701) 237-6983

8504050107

After 5 Days, Return To
NTNER, KELLY, KNUTSON, WEIR & BYE, LTD.
First Avenue North at Fifth Street
P. O. Box 1389
FARGO, NORTH DAKOTA 58107

RECEIVED FEC

84 MAY 1 AM 8:00

Charles N. Steele
General Counsel
Federal Election Committee
Washington, DC 20463

Cert 3270
Mims

STEPTOE & JOHNSON
CHARTERED
1250 CONNECTICUT AVENUE
WASHINGTON, D. C. 20036
(202) 862-2000
TELEX 89-2503
WRITER'S DIRECT DIAL NUMBER

LOUIS JOHNSON (1964)
ROBERT J. MCLAUGHLIN
D. GEORGE SWEIGERT
OF COUNSEL
WILLIAM E. MILLER
CECIL E. MUNSTEAD
VINCENT C. BURKE, JR.
STANLEY C. MORRIS, JR.

May 22, 1984

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

Re: MUR 1667

Dear Mr. Mims:

As I mentioned to you on the telephone, I have been engaged by Mr. Nick Spaeth, the Treasurer of the North Dakota Delegate Committee, to represent him before the Federal Election Commission in response to a notification of a complaint filed by Americans with Hart, Inc. against the Mondale for President Committee, Inc.

I am writing to request that the Commission grant Mr. Spaeth an extension of the 15-day period in which he has to respond to the complaint. Mr. Spaeth must send me the appropriate documents from Fargo, North Dakota where he resides, and I must also use the mail to send him a draft response for his approval. Because of the distance and the time required to send documents between Fargo, North Dakota and Washington, D. C., I feel that I would not be able to provide Mr. Spaeth with adequate representation in this matter without an extension.

If there are any further steps that I must take or materials that I must submit to accompany this request for an extension, please let me know.

I look forward to hearing from you as soon as possible.

Sincerely,

Jeanne Connelly

Jeanne Connelly

JC/ccm

8504050119

STEPTOE & JOHNSON
CHARTERED
1250 CONNECTICUT AVE., N. W.
WASHINGTON, D. C. 20036

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

RECEIVED AT THE FEC

84 JUN 11 AM 8:25

1008 Forest Hill Drive
Greensboro, North Carolina 27410

June 3, 1984

Charles N Steele
General Counsel
Federal Election Commission
1325 K Street N.W.
Washington DC. 20463

Re: MUR 1704

Dear Mr. Steele,

In response to your letter of May 29, 1984 re: MUR 1704, the Guilford Delegates for Mondale, and I, as Treasurer, have decided to respond without aid of counsel. We do not feel that we have violated the Federal Election Commission rules.

1. We did not "funnel excessive contributions through Mondale Delegate Committees." The total funds raised to date are $1834.00, and funds spent are $1707.37.

2. We, on our own, formulated a group of interested Mondale supporters to form "Guilford Delegates for Mondale." Two of our members have recently been selected at the North Carolina 6th District Convention to be Delegates. They are Wally Harrelson and Tom Coley. Maggie Jeffus, another member of o our committee was selected as an alternate.

3. No Mondale campaign workers at the national level staffed our "Delegate Committee". We had no paid workers. No Mondale workers at the national level were transferred to our "Delegate Committee" staff.

4. We received no Union PAC money.

5. We never transferred funds from one delegate committee to another. We raised and spent our money in North Carolina.

6. We disbanded our "Delegate Committee" after North Carolina's May 8 primary.

7. During our period of operation, we got no advice from Legal Counsel of the national Mondale Headquarters.

To sum up, it was our intention to function in a completely legal way.

In reference to P 25 of MUR 1704, "Complainants pray that the Commission rule"

1. This "Guilford Delegates for Mondale" Committee did not affiliate

8504050102 1

with other Delegate Committees.

2. Our "Delegate Committee" received no Union PAC funds.

3. Our purpose in organizing was to be actively showing our interest in the candidacy of Walter Mondale, so that we might be Delegates to the National Convention.

We hope this letter will take the place of a more formal response. If a formal, more legal response seems necessary, please advise as immediately.

Thanking you, I am,

Sincerely yours,

Helen R. Allegrone

Helen R. Allegrone, Treasurer
Guilford Delegates for Mondale

Enclosures:
Bank Statements
List of contributors
Expenditures

8504050102

GUILFORD DELEGATES FOR MONDALE
C/O MRS HELEN ALLEGRONE
1008 FOREST HILL
GREENSBORO NC 27410

[redacted]

DEBITS- CHECKS, PAYMENTS, WITHDRAWALS, OTHER CHARGES

DATE	AMOUNT	AMOUNT	AMOUNT	AMOUNT
0411	350.00 ✓			
0411	600.00 ✓			
0411	CHARGES FOR SERVICES PROVIDED			3.00
0411	96.22 ✓			
0411	15.98 ✓			
0425	50.00 ✓			
0426	60.00 ✓			
0430	54.51 ✓			
0430	CHECKING ACCOUNT SERVICE CHARGE FOR THIS MONTH			8.34

CREDITS- DEPOSITS, TRANSFERS, OTHER ADVANCES

DATE	AMOUNT	AMOUNT	AMOUNT	AMOUNT
0404	500.00 ✓			
0405	240.00 ✓			
0409	350.00 ✓			
0411	50.00 ✓	50.00 ✓		
0412	100.00 ✓	100.00 ✓		
0419	42.00 ✓			
0425	202.00 ✓			
0430	5.00 ✓			

IRS REQUIRES NCNB TO HAVE THE TAXPAYER IDENTIFICATIONNUMBER OF YOUR ORGANIZATION. PLEASE FURNISH THIS DATA AT YOUR CONVENIENCE

463.60
440 98
22.62

| | | |

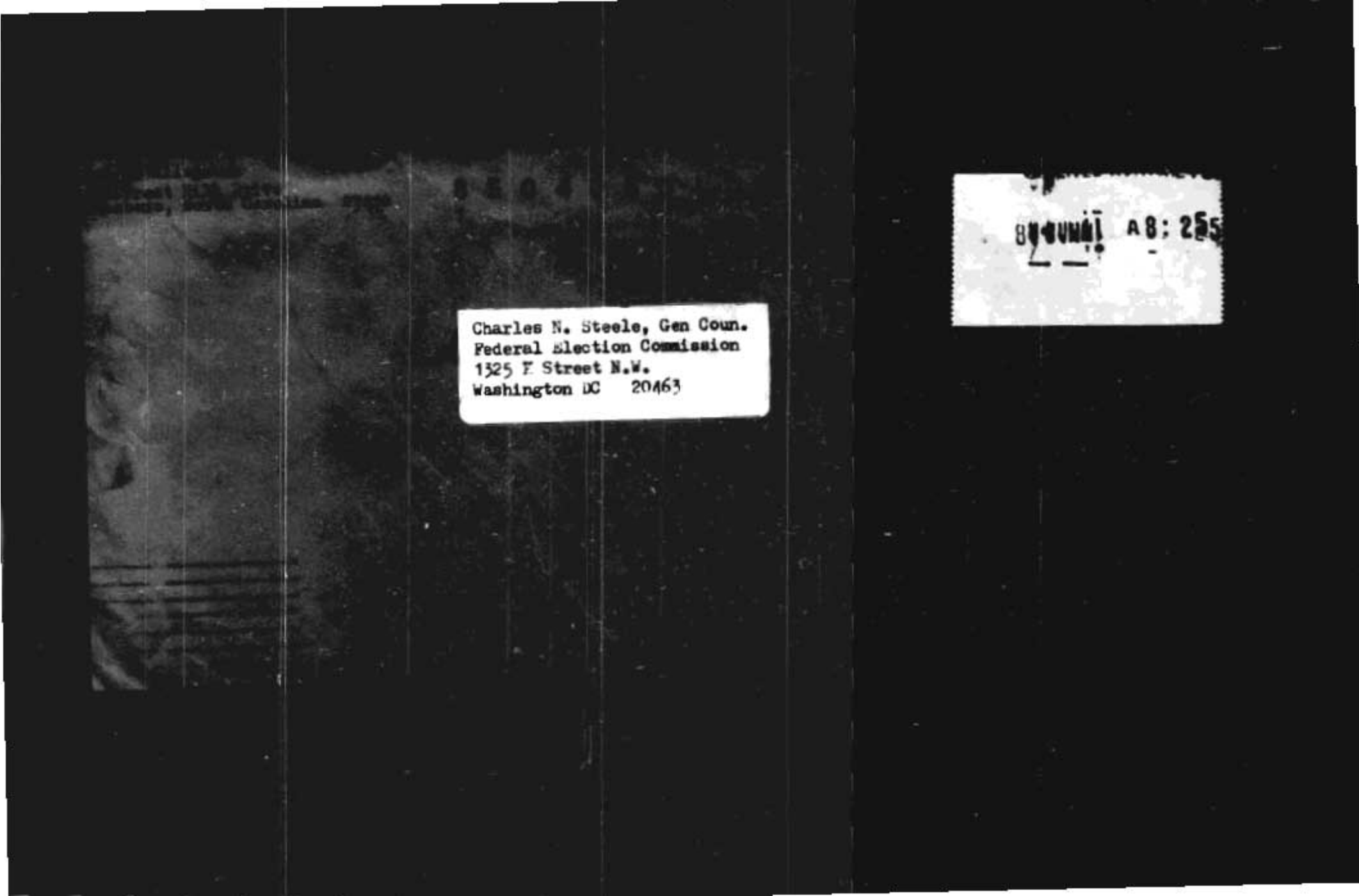
Earl Prayer 4/3	500.00	
Jane Preyer 4/9	50.00	
Helen Allegrane 4/9	300.00	
W. Douglas Tonor, Jr.	25.00	
Helen Doyle Black	50.00	
Constance L. Anlyan	25.00	
Thomas E. Caley	50.00	
Helen R. Allegrane	50.00	
Louise L Brantley	20.00	
Janie C. Phillips	20.00	
	240.00	240.00
Ellen W. Gerber	25.00	
Annie R. Ricks	100.00	
Pearl Berka	25.00	
	150.00	150.00
Total:		$1240.00

Contributors' Names and Initial Deposits

		$240.00
Maggie Jeffus	50.00	
Wally Howerton	50.00	
	100.00	100.00
Martha W. Lowe	25.00	
Cash Contrib.	17.00	
	42.00	42.00
Helen Allegrone	200.00	
Cash Contrib.	2.00	202.00
Helen Allegrone		50.00
		1634.00
Dr. Beachfish		50.00
		$1684.00

Expenses

Rent. J. Bernard Shaw	600.00
Tel.: Southern Bell	350.00
Printing: Arnold Copy Center	56.22
Jeannie Pegram (cleaning)	60.00
J.T. Logan (clean)	15.00
Doug Tanner (shipment stickers)	15.95
Norma Westmoreland	54.51
Political Americana (yard sign)	257.40
Cash (petty cash for office)	50.00
Political Americana (design for sign)	35.00
Political Americana	171.95
NCNB Service Charges:	
service charge 8.34	
deposit correction 3.00	
overdraft 15.00	
overdraft 15.00	
= 41.34	41.34
	1707.37



Charles N. Steele, Gen Coun.
Federal Election Commission
1325 F Street N.W.
Washington DC 20463

8 JUN 81 A8:25

Helen R. Allegrone
1008 Forest Hill Drive
Greensboro, North Carolina 27410

May 23, 1984

RECEIVED AT THE FEC
HAND DELIVERED
84 MAY 23 AM : 16

GCA #3315

Lawrence M. Noble
Federal Election Commission
Washington, DC 20463

Re: MUR 1667

Dear Mr. Noble,

In response to your letter of May 11, 1984 re MUR 1667, the Guilford Delegates for Mondale and I, as treasurer, have decided to respond without aid of counsel.

We do not feel that we have violated the Federal Election Commission rules.

1. We have not accepted PAC funds.
2. As of May 8, our headquarters have been shut down, and we have neither accepted nor received any moneys since that time.
3. We have not spent any money since May8.
4. It is our understanding that the national Mondale for President Organization will be refunding the money given by two of our members who had paid the maximum at the national level, and then contributed to the Guilford Delegates for Mondale Committee.
5. Finally, we were a completely autonomous committee, functioning totally apart from the national Mondale for President organization. Our funds came from the people of North Carolina, and were spent here.

This letter hopefully will take the place of any formal response. If a formal, legal response seems necessary, please advise us immediately.

Thanking you, I am,

Sincerely yours,
Helen R Allegrone
Helen R. Allegrone, Treasurer
Guilford Delegates for Mondale

Enc: Copies of:
Bank Statements,
Contributions and Bills

3504102 8

8504050102 9

INVOICE

TRIAD PRINTING CO.

400 Summit Avenue
Greensboro, N. C. 27405
Phone (919) 275-5012

INVOICE NUMBER № 1440

DATE May 2, 1984

ORDER NUMBER

CUSTOMER'S P.O. NUMBER

Mondale For President, Inc.
% Tom Coley
Greensboro, N. C.

TERMS: NET 10 DAYS

QUANTITY	DESCRIPTION	AMOUNT
5,000	Fliers - White - Black Ink - 11"	$187.06
5,000	" " " " "	
	Sales Tax	8.42
		$195.48

ALL INVOICES NOT PAID ACCORDING TO TERMS WILL BE ASSESSED 1½% SERVICE CHARGE

GUILFORD DELEGATES FOR MONDALE
C/O MRS HELEN ALLEGRONE
1008 FOREST HILL
GREENSBORO NC 27410

Note "+" Indicates Break in Numerical Sequence

DEBITS- CHECKS. PAYMENTS. TRANSFERS. OTHER WITHDRAWALS

DATE	AMOUNT	AMOUNT	AMOUNT	AMOUNT
0411	380.00			
0411	480.00			
0411	CHARGES FOR SERVICES PROVIDED			3.00
0412	86.22			
0426	15.95			
0426	50.00			
0426	60.00			
0430	54.51			
0430	CHECKING ACCOUNT SERVICE CHARGE FOR THIS MONTH			8.34

CREDITS- DEPOSITS. TRANSFERS. OTHER ADVANCES

DATE	AMOUNT	AMOUNT	AMOUNT	AMOUNT
0404	500.00			
0405	240.00			
0409	350.00			
0411	50.00	50.00		
0412	100.00	100.00		
0419	42.00			
0426	202.00			
0430	5.00			

IRS REQUIRES NCNB TO HAVE THE TAXPAYER IDENTIFICATIONNUMBER OF YOUR ORGANIZATION. PLEASE FURNISH THIS DATA AT YOUR CONVENIENCE

8504050030

46760
44098
27.02

50000	40683	
74000	55883	
109000	49883	
84000	44098	
104000		
43700		
38078		
42278		

Contributions:		Deposits:
Emily Preyer 4/3		500.00
Jane Preyer 4/9		50.00
Helen Allegrone 4/9		300.00
W. Douglas Connor, Jr.	25.00	
Helen Doyle Block	50.00	
Constance L. Anlyan	25.00	
Thomas E. Caley	50.00	
Helen R. Allegrone	50.00	
Louise L Brantley	20.00	
Janice C. Phillips	20.00	
	240.00	240.00
Ellen W. Gerber	25.00	
Annie R. Ricks	100.00	
Pearl Berlin	25.00	
	150.00	150.00
Total:		$1240.00

Contributors		Deposits
		1240.00
Maggi Jeffus	50.00	
Wally Horrelson	50.00	
	100.00	100.00
Martha W. Knox	25.00	
Cash Contrib.	17.00	
	42.00	42.00
Helen Allegrone	200.00	
Cash Contrib.	2.00	202.00
Helen Allegrone		50.00
		1634.00
Dr Bardolph		50.00
		# 1684.00

DATE April 3 19 84

CASH		
CHECKS		
TOTAL FROM OTHER SIDE		
TOTAL	580	00

88-55/531

PLEASE ITEMIZE ADDITIONAL CHECKS ON REVERSE SIDE

NCNB National Bank of North Carolina
Greensboro, NC 27420

⑆053100559⑆ 0216274329⑈

3 2405010337

NCNB

Checking Account Deposit

NCNB National Bank of North Carolina
GREENSBORO, NC

All items are received for purposes of collection and are subject to provisions of the Uniform Commercial Code as in effect in North Carolina and the rules and regulations of this bank. All credits for items are provisional until final payment.

Deposit to the Account of (Please Print Full Name)
Stanford Delegates for Mondale

Account Number 0216274329 Date 4-5-84

	Dollars	Cents
Currency		
Coins		
Checks: List attached	240	00
Total		
Less Cash Received		
Total Deposit	240	00

Sign here ONLY if cash received from deposit.

DEPOSIT TICKET

Louise L Smith
Jane C. Phillips
Doug Turner
Helen Flake

DATE April 5 19 84

CASH		
CHECKS 347	20	00
137	20	00
342	25	00
1200	50	00
TOTAL FROM OTHER SIDE	125	00
TOTAL	240	00

88-55/531

PLEASE ITEMIZE ADDITIONAL CHECKS ON REVERSE SIDE

NCNB National Bank of North Carolina
Greensboro, NC 27420

⑆053100559⑆ 0216274329⑈

Urgent Yellow

Done

☐	1 The bumper stickers	☐
☐	2 + button order (s)	☐
☐	3 Canceled - There	☐
☐	4 will be a $35.00 charge	☐
☐	5 for artwork already	☐
☐	6 completed. They will	☐
☐	7 retain the artwork	☐
☐	8 on file so that we	☐
☐	9 can order at a later	☐
☐	10 date with no artwork	☐

NOTES: Charge.
per phone: Lee Rosen
4-26-84
CP

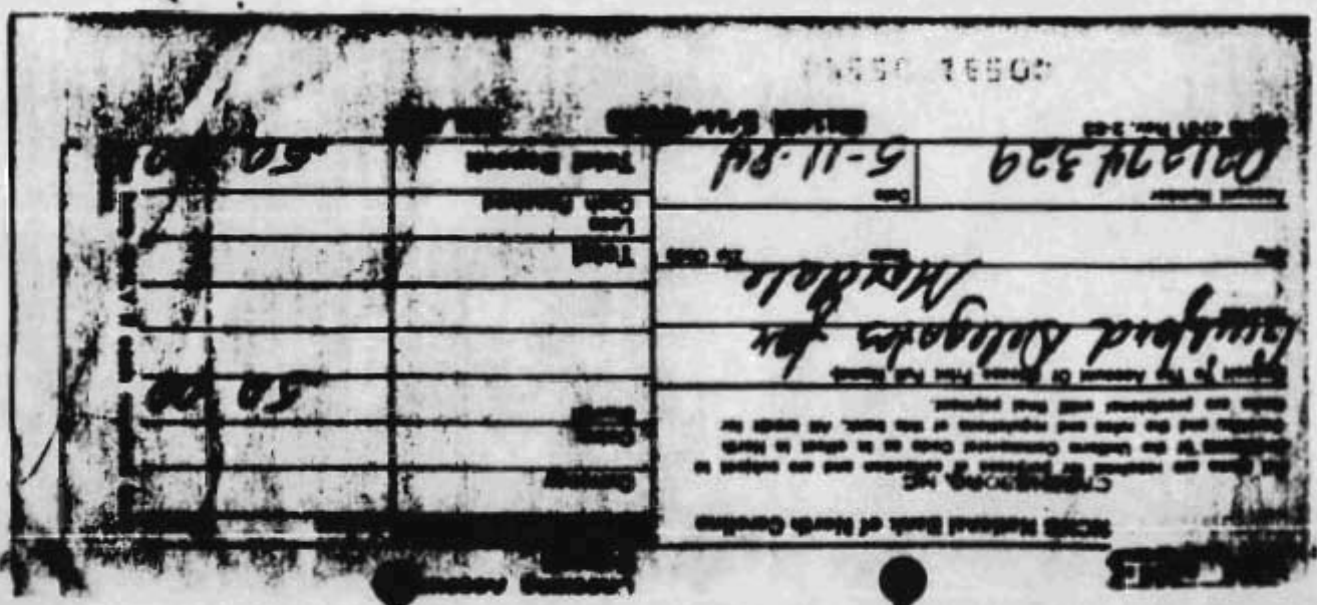
☐ TAKE PRINTING TO COPY KING ☐

8504050103.4

COPY KING PRINTING

PHONE 275-7883

322 W. FRIENDLY AVE.
GREENSBORO, NC 27402



DATE April 18 19 84

CASH		
CHECKS 314	25	00
1065	17	00
TOTAL FROM OTHER SIDE		
TOTAL	$ 42	00

PLEASE ENDORSE ADDITIONAL CHECKS ON REVERSE SIDE

NCNB National Bank of North Carolina Greensboro, NC 27420

⑆053100559⑆ 0212743298

314

MARTHA W. KNOX
NCDL 9376 PH 292-0692
1507 VALLEYMEADE RD
GREENSBORO, NC 27410

April 17 1984

Pay To The Order Of Guilford Delegation Br Module $ 25.00

Twenty-five and no/100 Dollars

NCNB National Bank of North Carolina Greensboro, NC 27405

For

Martha W. Knox

1065

CHARLES ALLEGRONE NCDL 2280188
HELEN R. ALLEGRONE PH 292-0672
1008 FOREST HILL DR
GREENSBORO, NC 27410

April 18 1984

PAY TO THE ORDER OF Guilford Delegate for Module $ 17.00

Seventeen and 00/100 DOLLARS

HOME FEDERAL Greensboro, North Carolina

FOR cash contribution

Helen R. Allegrone

⑆053100559⑆ 0212743298

W. DOUGLAS TANNER, JR.
3715 PORTER ST., NW PH 966-1752
WASHINGTON, D.C. 20016

342

April 4 19 84

Guilford Delegates for Mondale $ 25.00

Twenty-five and 00/100 DOLLARS

To: Wright Patman Congressional Federal Credit Union
U.S. House of Representatives
Washington, D.C. 20515

W. Douglas Tanner, Jr.

DANIEL E. BLACK MD 10/80
HELEN DOYLE BLACK
2319-E PATRIOT WAY PH 919-288-5757
GREENSBORO, NC 27408

1200

4-4 19 84

Guilford Delegates for Mondale $50.00

Fifty and 00/100 Dollars

Wachovia
Wachovia Bank & Trust Company, N.A.
Greensboro, NC 27420

Helen Doyle Black

0 5 0 3.6

3303

[illegible]stance L. Anlyan
[illegible]-1097, NCDL 5226984
[illegible] C Tower Rd.
Greensboro, NC 27410

April 11 19 84

to the order of Guilford Delegates for Mondale $ 20.00

LOUISE L. BRANTLEY d/TN
NCDL 2504160 PH 288-1788
5119-E LAWNDALE DR.
GREENSBORO, NC 27408

3647

April 5 19 84

PAY TO THE ORDER OF Guilford Delegates for Mondale $ 30.00

Thirty and 00/100 DOLLARS

Wachovia
Wachovia Bank & Trust Company, N.A.
Greensboro, NC 27420

FOR

Louise L. Brantley

DATE April 24 19 84

SUBTOTAL		
TOTAL FROM OTHER SIDE		
TOTAL	202	00

PLEASE ITEMIZE ADDITIONAL CHECKS ON REVERSE SIDE

NCNB National Bank of North Carolina Greensboro, NC 27420

⑆053100559⑆ 0212743299

HELEN R. ALLEGRONE
1008 FOREST HILL DR
GREENSBORO, NC 27410

182

April 24 19 84

PAY TO THE ORDER OF Guilford Dialysis for Months is 200.00

Two hundred and 00/ DOLLARS

Wachovia
Wachovia Bank & Trust Company, N.A.
Greensboro, NC 27420

CASH INVESTMENT ACCOUNT SM

FOR

Helen R Allegrone

DATE April 11 19 84

SUBTOTAL		
TOTAL FROM OTHER SIDE		
TOTAL	50	00

PLEASE ITEMIZE ADDITIONAL CHECKS ON REVERSE SIDE

NCNB National Bank of North Carolina Greensboro, NC 27420

⑆053100559⑆ 0212743299

DR. OR MRS. RICHARD BARDOLPH
207 TATE ST.
GREENSBORO, N.C. 27403

585

April 11 19 84

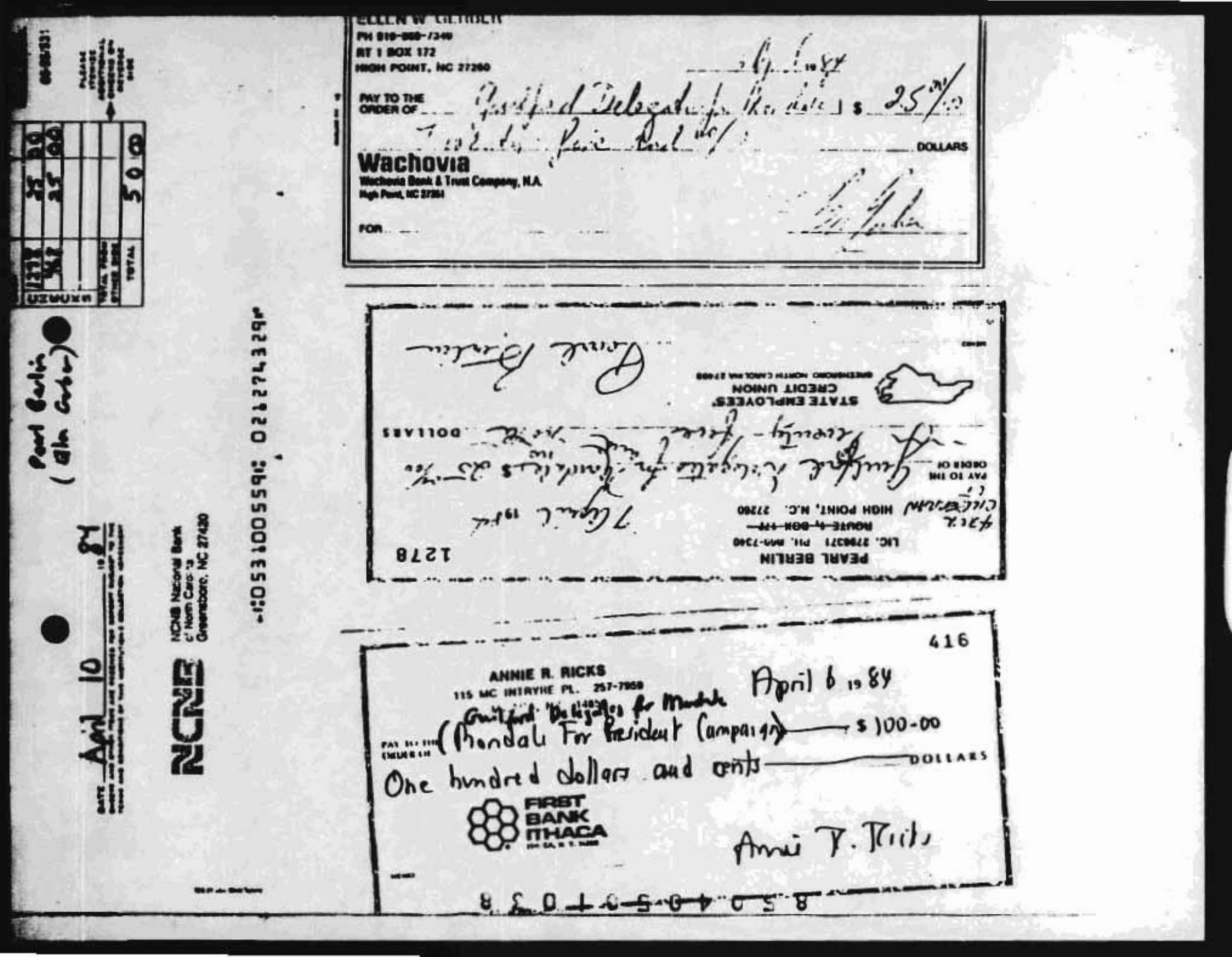
PAY TO THE ORDER OF Guilford Collegiate for Months $ 50.00

Fifty and no/100 DOLLARS

Northwestern Bank
GREENSBORO, N.C. 27420

Richard Bardolph

8504050037



ELLEN W GERBER
PH 819-869-7349
RT 1 BOX 172
HIGH POINT, NC 27260

6 April 19 84

PAY TO THE ORDER OF Guilford Delegate for Mondale $ 25.00

Twenty five and no/100 DOLLARS

Wachovia
Wachovia Bank & Trust Company, N.A.
High Point, NC 27261

FOR

E. Gerber

PEARL BERLIN
LIC. 279637I PH. 869-7360
ROUTE 9 BOX 979
HIGH POINT, N.C. 27260

1278

7 April 19 84

PAY TO THE ORDER OF Guilford Delegate for Mondale $ 25.00

Twenty five and no/100 DOLLARS

STATE EMPLOYEES' CREDIT UNION
GREENSBORO, NORTH CAROLINA 27408

Pearl Berlin

416

ANNIE R. RICKS
115 MC INTYRE PL. 257-7959

April 6 19 84

PAY TO THE ORDER OF (Guilford Delegates for Mondale Mondale For President Campaign) $ 100-00

One hundred dollars and cents DOLLARS

FIRST BANK ITHACA

Annie R. Ricks

⑈053100559⑈ 021274329⑈

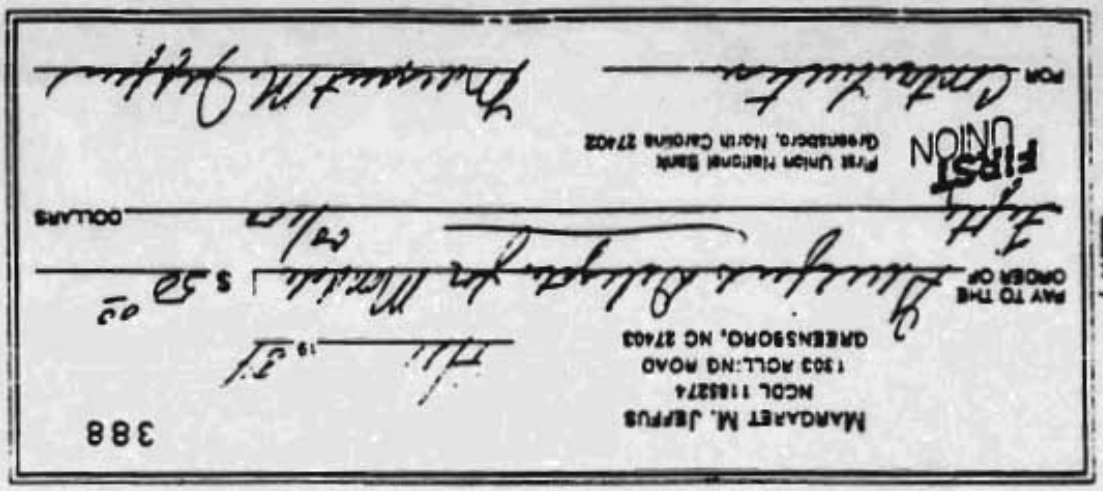
NCNB National Bank of North Carolina
Greensboro, NC 27420

NCNB

DATE April 10 19 84

Paul Gerber (Ellen Gerber)

		25 00
		25 00
		50 00



MARGARET M. JEFFUS
NCDL 11852?4
1303 ROLLING ROAD
GREENSBORO, NC 27403

388

PAY TO THE ORDER OF Margaret M. Jeffus $ 50.00

FIRST UNION
First Union National Bank
Greensboro, North Carolina 27402

FOR Contribution

Margaret M. Jeffus

8504050I039

WALLACE C. HARRELSON 01/01
PH 674-6849 NCDL 1513065
3904 WILLIAMS DAIRY RD
GREENSBORO, NC 27406

3809

4-11-1984

PAY TO THE ORDER OF Guilford Delegates for Mondale $50.00

Fifty & 00/100 DOLLARS

Wachovia
Wachovia Bank & Trust Company, N.A.
Greensboro, NC 27420

FOR Contribution

Wallace C. Harrelson

DEPOSIT TICKET

Jeffus
Harrelson

CASH		
CHECKS 388		50 00
3904	$	50 00
TOTAL FROM OTHER SIDE		
TOTAL		100 00

PLEASE ITEMIZE ADDITIONAL CHECKS ON REVERSE SIDE

DATE April 12 1984

CHECKS AND OTHER ITEMS ARE RECEIVED FOR DEPOSIT SUBJECT TO THE TERMS AND CONDITIONS OF THIS INSTITUTION'S COLLECTION AGREEMENT

NCNB

NCNB National Bank
of North Carolina
Greensboro, NC 27420

66-55/531

NCNB 4700(2-83)

42.00 D10

NCNB

Teller
Deposit Receipt

NCNB National Bank

☒ Checking
☐ Savings

All Items Are Credited Subject To Final Payment
Please Retain This Receipt Until You Receive Your Account Statement
The Bank Symbol, Transaction Number, Date and Amount of Your Deposit Are Shown Below

NCNB 4700(2-83)

0211634 4/09/848133 $50.00 D

Barbara

NCNB

Checking Account
Deposit

NCNB National Bank of North Carolina

GREENSBORO, N.C.

Items are received for purpose of collection and are subject to provisions of the Uniform Commercial Code as in effect in North Carolina and the rules and regulations of this bank. All credit for items are provisional until final payment.

Deposit To The Account Of (Please Print Full Name)

Guilford Delegate Bd Mondale

Greensboro, NC 27410

City State Zip Code

Account Number: 021274329

Date: 4/9/84

	Dollars	Cents
Currency		
Coins		
Checks: 1023	50	00
179	300	00
Total	350	00
Less Cash Received		
Total Deposit	350	00

Sign here ONLY if cash received from deposit.

NCNB 5781 Rev. 2-83

0211634 4/09/848206 $350.00 D

[redacted]

66-55/531

PLEASE ITEMIZE ADDITIONAL CHECKS ON REVERSE SIDE

NCNB

Credit Correction Notice

NCNB National Bank

City: Greensboro

Date: 4-12

An error was found in your deposit dated: 4-10 Seq. No. Deposit Total $ 50.00

Tape Total $

Merchant I.D.

Check Drawn On

Endorsed By

Drawn By

Reason For Correction

- ☐ Check listed $ ____ Correct Amount $ ____ Maker
- ☐ Check for $ 100.00 enclosed between $ 50.00 and $ 25.00 but not listed
- ☐ Error of $ ____ in addition.
- ☐ Bank Card Draft Listed $ ____ Correct Amount $ ____ Maker
- ☐ Bank Card Draft For $ ____ Enclosed Between $ ____ and $ ____ but not listed

We Credit Your Account | FRD/ABA | Account No. 021274329 | T/C | Amount $ 100.00

Comments

Pearl Berlin
C/O Mrs Helen Allegram
1008 Forest Hall
Greensboro, N.C. 27410

ADVICE TO CUSTOMER

☐ Checking
☐ Savings

All Items Are Credited Subject To Final Payment
Please Retain This Receipt Until You Receive Your Account Statement
The Bank Symbol, Transaction Number, Date and Amount of Your
Deposit Are Shown Below

NCNB 4780(2-83)

0211617 4/30/848104 $5.00 D

NCNB

Teller
Deposit Receipt

NCNB National Bank

☐ Checking
☐ Savings

All Items Are Credited Subject To Final Payment
Please Retain This Receipt Until You Receive Your Account Statement
The Bank Symbol, Transaction Number, Date and Amount of Your
Deposit Are Shown Below

NCNB 4780(2-83)

0211677 4/12/848101 $100.00 D

8504030011041

0211617 4/11/848040 $50.00 D

NCNB 4780(2-83)

☐ Savings
☐ Checking

All Items Are Credited Subject To Final Payment
Please Retain This Receipt Until You Receive Your Account Statement
The Bank Symbol, Transaction Number, Date and Amount of Your
Deposit Are Shown Below

NCNB National Bank

Teller
Deposit Receipt

NCNB

NCNB

Teller
Deposit Receipt

NCNB National Bank

☐ Checking
☐ Savings

All Items Are Credited Subject To Final Payment
Please Retain This Receipt Until You Receive Your Account Statement
The Bank Symbol, Transaction Number, Date and Amount of Your
Deposit Are Shown Below

NCNB 4780(2-83)

0215867 4/25/84#035 $202.00 D

Amount of Item	Balance Before Item Presented	Date and Amount of Last Deposit
$ 815.00	$ 23.37-	04/30/84 $ 85.00

GUILFORD DELEGATES FOR MONDALE — 0531-0055
C/O MRS HELEN ALLEGRONE
1008 FOREST HILL
GREENSBORO NC 27410

Account Number 021274329

For Handling This Item We Charge Your Account

78 $15.00

Return Check Charge

Location	Source Code	Date
NCNB GREENSBORO	020050644	05/02/84

The following item presented against your account was returned unpaid because of insufficient funds. CHECK PAID CREATED AN OVERDRAFT OF $

CHECK, DRAFT, OR DEBIT ITEM

Amount of Item	Balance Before Item Presented	Date and Amount of Last Deposit
$ 171.95	$ 148.58	04/30/84 $ 85.00

GUILFORD DELEGATES FOR MONDALE 0531-0055
C/O MRS HELEN ALLEGRONE
1008 FOREST HILL
GREENSBORO NC 27410

Account Number 021274329

For Handling This Item We Charge Your Account

78 $15.00

NCNB National Bank

We charge your account for the following reason: HANDLING CHARGE FOR DEPOSIT CORRECTION

Checking Account Debit

Date 4-13-84

City Greensboro

Prepared By J. Fields

Approved By C Hearn

FRB ABA Number	Account Number
0531-0055	021274329

TC	Amount
796	3 00

Pearl Berlin
C/O Mrs. Helen Allegram
1008 Forest Hall
Greensboro, N. C. 27410

NCNB 3 Rec. Pa 4 0 1 0 4 2

Expenses

Rent. J. Bernard Shaw	600.00
Tel.: Southern Bell	350.00
Printing: Arnold Copy Center	56.22
Jeannie Pegram (cleaning)	60.00
J.T. Logan (clean)	15.00
Doug Tanner (shipment duties)	15.95
Norma Westmoreland	54.51
Political Americana (yard sign)	257.40
Cash (petty cash for office)	50.00
Political Americana (design for pins)	35.00
Political Americana	171.95

NCNB Service Charges:

service charge	8.34
deposit correction	3.00
overdraft	15.00
overdraft	15.00
	$ 41.34

41.34

1707.37

850410250410043

Apr 15 84

PAY TO THE ORDER OF J. Bennett Lee $ 600.00/100

Six hundred and 00/ DOLLARS

NCNB National Bank of North Carolina Greensboro, NC 27420

FOR rent - March

Helen R Allegra

⑈053100559⑈ 02827432⑈ 0000060000

4294348

Apr 9 84

PAY TO THE ORDER OF Southern Bell Telephone Co $ 350.70

Three hundred fifty and 00/ DOLLARS

NCNB National Bank of North Carolina Greensboro, NC 27420

FOR telephones

Helen Allegra

⑈053100559⑈ 02827432⑈ 0000035000

4-12-84 88-55/531

PAY TO THE ORDER OF Gerald Cofey Cates $ 56.22

fifty six + 22/100 DOLLARS

NCNB National Bank of North Carolina Greensboro, NC 27420

FOR printing

Helen R Allegra

⑈053100559⑈ 02827432⑈ (9,9) 2 0000005622

NORTHWESTERN BANK GREENSBORO, NC April 16 84 88-55/531

PAY TO THE ORDER OF Jeannie Pegram APR 25 '84 $ 60.00/100

Sixty and 00/ TELLER 0110 DOLLARS

NCNB National Bank of North Carolina Greensboro, NC 27420

FOR Clearing Hdqtrs.

Helen R Allegra

⑈053100559⑈ 02827432⑈

Fifteen and 45/ DOLLARS

NCNB National Bank of North Carolina Greensboro, NC 27420

FOR Trailways, Inc - shipment Helen R Allegra

⑆053100559⑆ 0216274329⑈ ⑈0000006595⑈

Fifty and 51/ DOLLARS

NCNB National Bank of North Carolina Greensboro, NC 27420

FOR food for occasion Helen R Allegra

⑆053100559⑆ 0216274329⑈ ⑈0000005451⑈

Gift Guilford Del. for Mondale

11th

H dw 4-30

April 24 19 84 88-55/391

PAY TO THE ORDER OF Cash $ 50.00

Fifty and 00/ DOLLARS

NCNB National Bank of North Carolina Greensboro, NC 27420

FOR petty cash in 0800045 4-25-84 $50.0000 Helen R Allegra

⑆053100559⑆ 0216274329⑈ ⑈0000005000⑈

9 88-55/391

19

PAY TO THE ORDER OF $

DOLLARS

NCNB National Bank of North Carolina Greensboro, NC 27420

FOR Helen R. Allegra

⑆053100559⑆ 0216274329⑈

⑈354⑈ 0405⑈ 045

Customer's Order No. Hensley Date 4-12-84

Name Marshall Mahaffey Cannon

Address

SOLD BY	CHARGE	C.O.D.	CHARGED	CHECK	MDSE.	PAID OUT	TERMS

QUANTITY	DESCRIPTION	PRICE	AMOUNT
3M	flyers		53 [illegible]
			8 [illegible]
			56 22
	#3 4/12		

TOTAL

All claims and returned goods MUST be accompanied by this bill.

Rec'd By

8504059104046

RECEIPT FOR COPIES

DATE 4-26-84

NUMBER OF COPIES 100

AMOUNT 8.00

TAX .36

TOTAL $8.36

Paid by cash
4-26-84
CP

COPY KING PRINTING

P.O. BOX 1057
333 W. FRIENDLY AVE.
GREENSBORO, NC 27402
PHONE 275-7666

8504050 1047

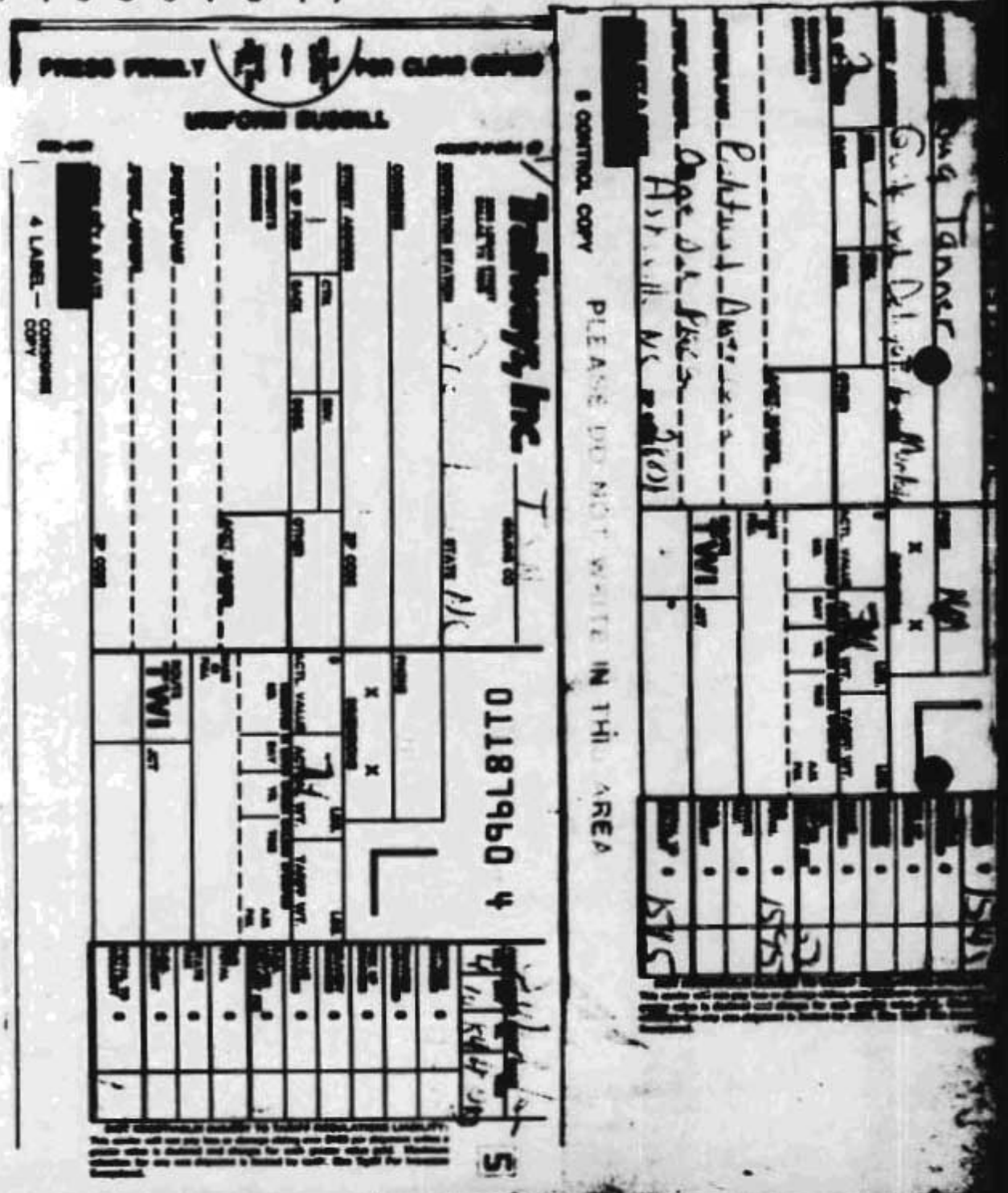
4-10-84

To Tom Cooley

Cleaning 2 20 W Market St.

Total $ 60.00

From Jeannie Pegram
2214 Hubert St.
Greensboro NC
27403
phone 299-0897



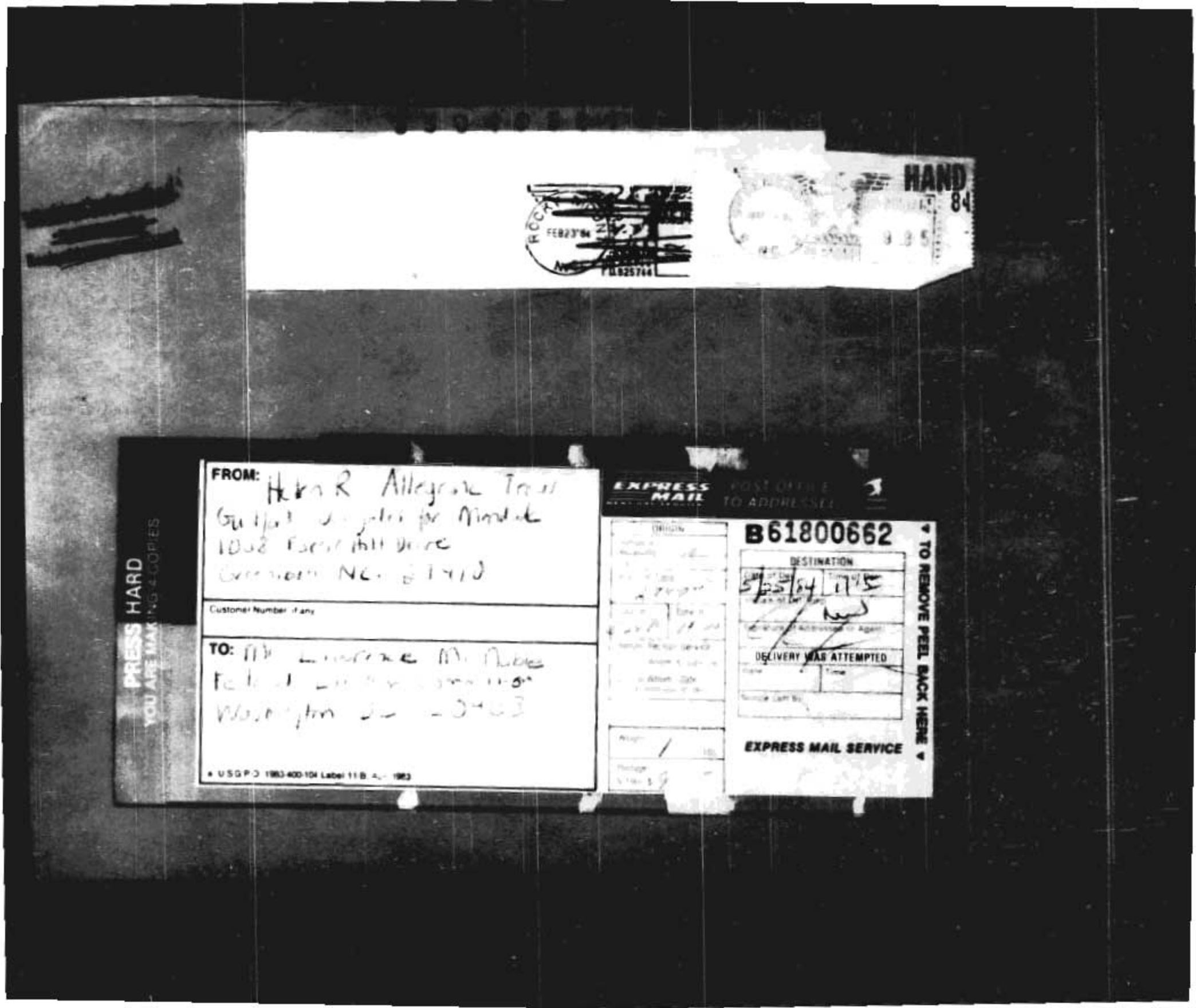
Bills Outstanding

Triad Printing Co. (flies) $195.48

Telephone

Electricity

Claude Pepper Dinner (1.75 pp)
"send to Washington" Pat Gorrell


HAND
84
FEB 23 '84
PRESS HARD
YOU ARE MAKING 4 COPIES
FROM:
Customer Number (if any)
TO:
EXPRESS MAIL
POST OFFICE TO ADDRESSEE
B61800662
DESTINATION
DELIVERY WAS ATTEMPTED
EXPRESS MAIL SERVICE
TO REMOVE PEEL BACK HERE

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Helen Russell Allegrone, Treasurer
Guilford Delegates For Mondale
1803 Rolling Road
Greensboro, NC 27403

Re: MUR 1667

Dear Ms. Allegrone:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

8504050050

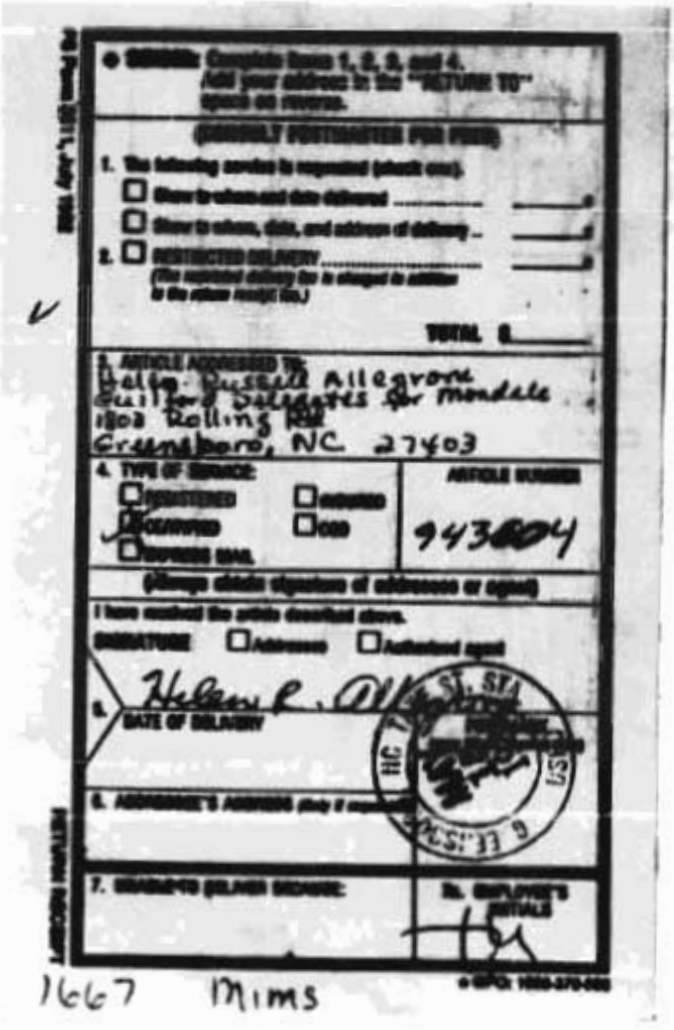
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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



8504050105

MUR 1667
RECEIVED AT THE FEC
84 JUN 4 P1:14
3456
MUR 1667
Memo
4 P3:33

May 30, 1984

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

RE: Northern New York Delegates for Mondale
MUR-1667

Dear Sirs:

I am presently in receipt of your materials concerning the charge brought against the Mondale for President Campaign by the Hart for America Organization.

Enclosed you will find copies of bank statements for the Northern New York Delegates for Mondale Committee. You will note that our committee received a total of $20.00 and that same $20.00 is still in the bank account awaiting final disposition of this matter. I also wish to point out that the $20.00 donated to our committee was put there as a donation from myself.

Should you require any further information, please do not hesitate to contact me.

Very truly yours,

CLIFFORD R. DONALDSON, JR.

Sworn to beforeme this 30th day of May, 1984

GLORIA J. JANDREW

GLORIA J. JANDREW

8504050102

NORTHERN NEW YORK DELEGATES FOR
MONDALE
PO BOX 127
LAKE CLEAR NY 12945

KEY BANK

Key Bank of
Northern New York N.A.
Watertown, New York 13601

261 030409	APR 20,1984	1

TAX-SAVING IRA IS NOW AVAILABLE TO MOST INCOME EARNERS.
CONTACT YOUR PERSONAL BANKER. JON M. WILDER 891-2900

MUR-1667

DATE 3/21/84	NUMBER	TOTAL AMOUNT	NUMBER	TOTAL AMOUNT	DATE 4/20/84
20.00	0	.00	0	.00	20.00

LEGEND FOR OTHER CREDITS:
E = ERROR CORRECTION
M = CREDIT MEMO
T = INTERNAL TRANSFER
I = INTEREST
D = DIRECT DEPOSIT

LEGEND FOR OTHER CHARGES:
C = CERTIFIED CHECK
E = ERROR CORRECTION
M = DEBIT MEMO
- = OVERDRAFT
R = RETURNED ITEM
S = SERVICE CHARGE
T = INTERNAL TRANSFER
D = AUTHORIZED PAYMENT

DDA 20 5 81

PLEASE EXAMINE AND REPORT ERRORS IMMEDIATELY

8504050053

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1667

NAME OF COUNSEL: Richard H. Edwards

ADDRESS: Key Bank Building
130 E. Main
Malone, New York 12953

TELEPHONE: (518) 483-4330

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.

5/25/84
Date

Clifford B. Donaldson, Jr.
Signature

RESPONDENT'S NAME: Clifford B. Donaldson, JR.

ADDRESS: P.O. Box 127
Lake Clear, N.Y. 12945

HOME PHONE: (518) 327-3627

BUSINESS PHONE: (518) 483-6767 ext. 264

8504050054

ifford R. Donaldson, Jr.
ox 127
lear, New York 12945

RETURN RECEIPT
REQUESTED

CERTIFIED
P 754 900 435
MAIL

The Federal Election Commission

1325 K Street, N.W.

Washington, D.C. 20463

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Clifford R. Donaldson, Jr., Treasurer
Northern New York Delegates for Mondale
PO Box 127
Lake Clear, NY 12945

Re: MUR 1667

Dear Mr. Donaldson:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

8504050056

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

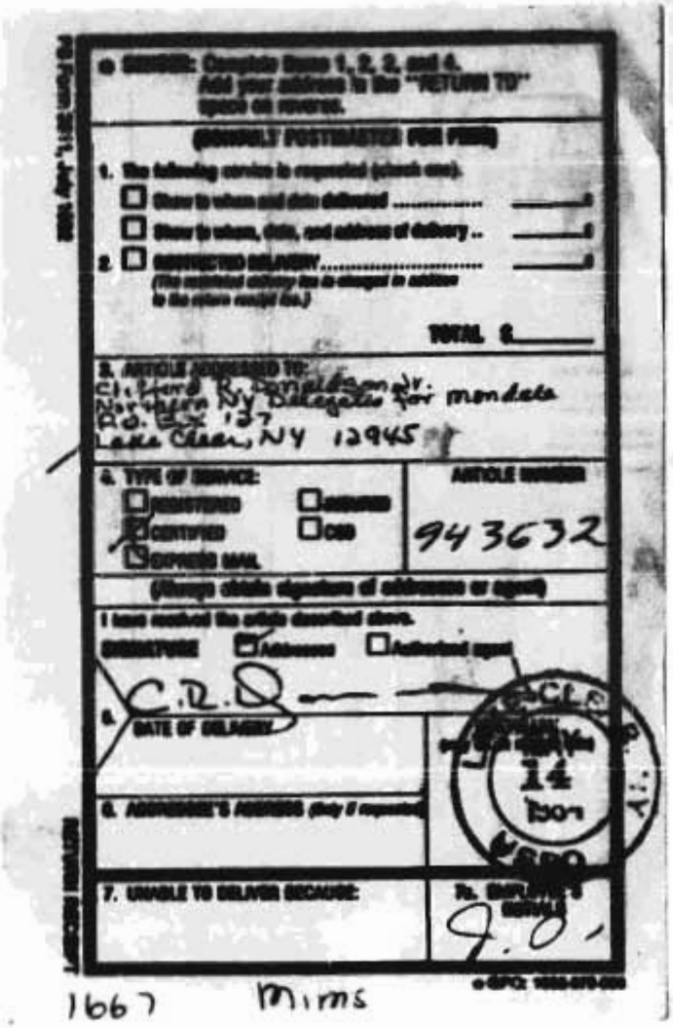
Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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

8504050057



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Janet E. Bald, Treasurer
Southern Tier for Mondale
135 1/2 North 6th Street
Olean, NY 14760

Re: MUR 1667

Dear Ms. Bald:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

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

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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.

8504010058

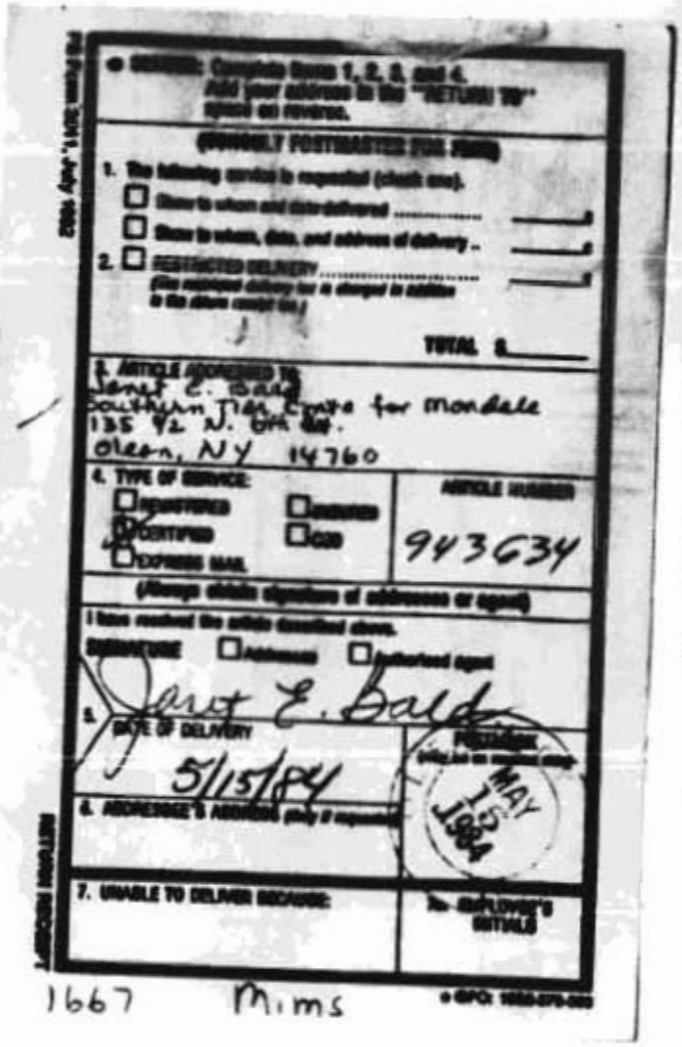
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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



8504050059

RECEIVED AT THE FEC
Ga # 3346
MAY 29 P1:00

92 Hillcrest Road
Mount Vernon, New York
10552

May 25, 1984

MUR 1667 AM:44
Memo

CERTIFIED MAIL

Lawrence M. Noble
Deputy General Counsel
Federal Election Commission
Washington, D.C. 20463

Re: ID # C00179879 - MUR 1667

Dear Mr. Noble:

Thank you for your recent letter concerning the complaints and supplements filed against the Mondale for President Committee, Inc., and delegates supporting Walter Mondale (MUR 1667).

While I would like to be helpful in this matter, after reviewing the complaints and supplements, I am not sure in what way to respond. My committee and myself, as treasurer, were not named as respondents. As far as I can see, while there is reference to Mondale delegate committees, in general and specifically, there are no references to any committee or myself, as treasurer. There are no allegations made against my committee or me. Consequently, I am at a loss on how to comment on a document that makes no reference to my committee.

Again, I would like to cooperate in the resolution of this matter, but there is nothing specific to comment on in the documents provided.

Thank you for your assistance in this matter.

Very truly yours,

Elizabeth Tarpey

Elizabeth Tarpey, Treasurer
Sharpe/Jackson Delegates for
Mondale

8504050060

Tarpey
Hillcrest Road
mt Vernon, New York
52

6
0
1

WESTCHESTER, NY
PM
25 MAY
1984



Lawrence M. Noble
Deputy General Counsel
Federal Election Commission
Washington, D.C. 20463

CERTIFIED
P30 4915293
MAIL

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Elizabeth Tarpey, Treasurer
Sharpe/Jackson Delegates for
Mondale
92 Hillcrest Road
Mt. Vernon, NY 10552

Re: MUR 1667

Dear Ms. Tarpey:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against the committee and you, as treasurer, 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.

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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.

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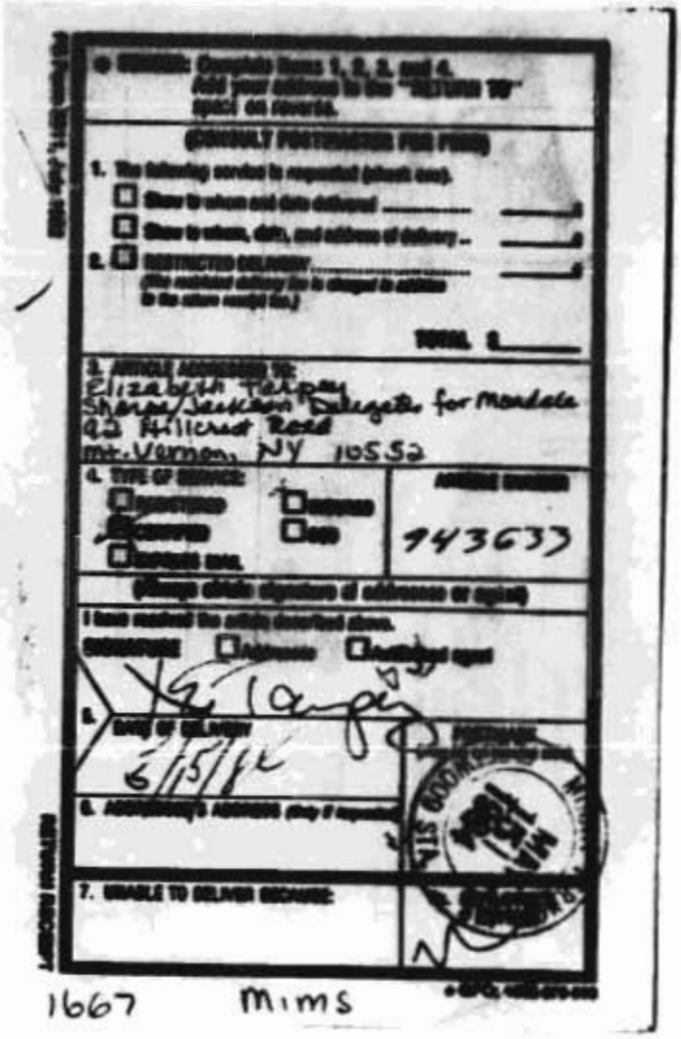
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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



8524050010063

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Louis Nicolella, Treasurer
North Country Delegates for
Mondale
68 Third Street
Gloversville, NY 12078

Re: MUR 1667

8504050064

Dear Mr. Nicolella:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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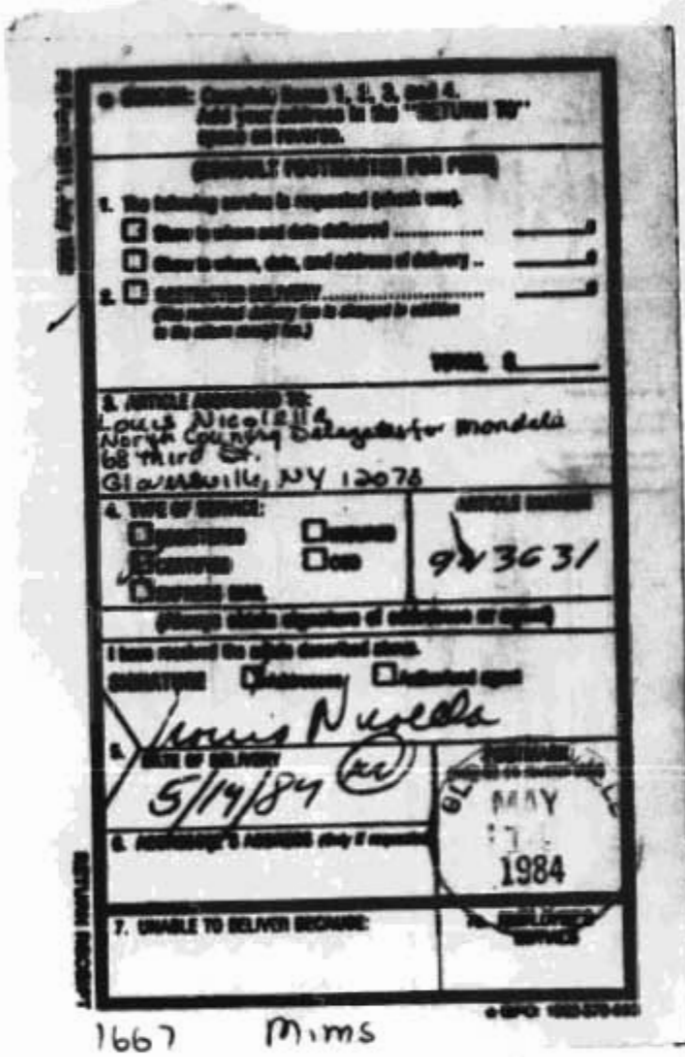
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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



1667 Mims

8504050106 5

RECEIVED BY THE FEC
84 JUN 4 A9:14

ONE CHASE MANHATTAN PLAZA
NEW YORK, N. Y. 10005

Re: Naples MUR 1667
Memo

May 29, 1984

MUR 1667

Dear Mr. Noble:

I understand that you have transmitted copies of the complaint of Americans With Hart and the supplements thereto to Evelyn L. Rockas, treasurer of the 28th Congressional District Delegates for Mondale Committee, and Mary E. Gurnett, treasurer of the Naples-Mondale Delegate Slate. Please be advised that Thomas D. Barr and I have agreed to represent these committees and their respective treasurers in this matter.

Although your letters state that the complaint and supplements allege that the committees and individuals mentioned above "may have violated certain sections of the Federal Election Campaign Act of 1971, as amended," neither the complaint nor any of the supplements make reference to these committees or to these individuals. While the materials do contain certain broad statements concerning delegate committees generally, there is no way for us to know which, if any, may be intended to refer to our clients. In these circumstances, we find it very difficult to comment on behalf of these committees and their treasurers.

Our clients wish to cooperate fully with the Commission and will be pleased to answer any specific questions you may wish to put to them in aid to an appropriate investigation. If you have any such questions or requests for materials, please get in touch with me.

Very truly yours,

Ellen S. Oran

Ellen S. Oran

Lawrence N. Noble, Esq.,
Deputy General Counsel,
Federal Election Commission,
1325 K Street, N.W.,
Washington, D.C. 20463

68A

8504050106 6

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mary E. Gurnet, Treasurer
Naples-Mondale for President
Delegate Slate
Box 124
Clifton Park, NY 12065

Re: MUR 1667

Dear Ms. Gurnet:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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If you intend to be represented by counsel in this matter please advise the Commission by 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.

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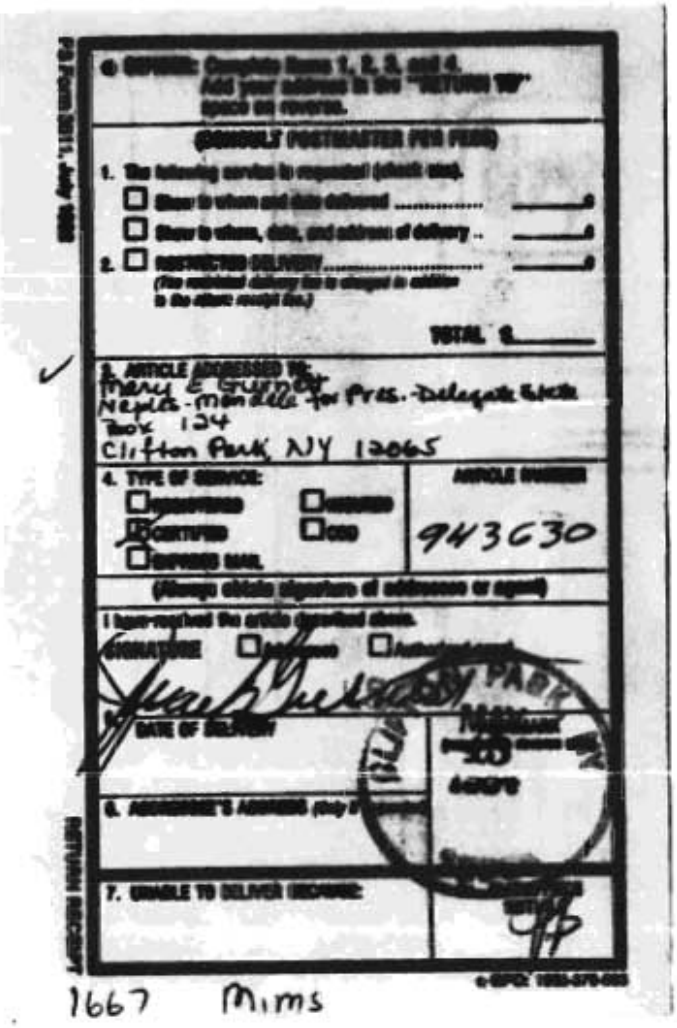
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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



8504050010 69

RECEIVED BY THE FEC
84 MAY 29 P12:43

Ronald V. Iaboni
Lower Hudson
Delegates for Mondale
1 Fisher Drive
Mount Vernon, New York 10552

May 25, 1984

MUR 1667
Memo
84 JUN -4 A11:47

Lawrence M. Noble, Deputy General Counsel
Federal Election Commission
Washington, D.C. 20463

Dear Mr. Noble:

Thank you for your letter dated May 11, 1984 concerning an FEC complaint filed against the Mondale for President Committee, Inc. and various delegate committees.

I would like to assist you in this matter, however, I am unclear as to why I received the complaint.

Firstly, the Lower Hudson Delegates for Mondale Committee registration forms were filed in anticipation of raising and spending the statutory threshold of one thousand ($1,000.00) dollars in support of our delegate candidate.

However, the committee spent only approximately two hundred ($200.00) dollars, and consequently I am assuming there is no legal need for a committee and there is no responsibility to file the financial statements.

However, if I am wrong in this assumption, after reviewing the complaint and supplements, I am not clear as to what would be an appropriate response, my committee and myself, as treasurer, were not named as respondents. While there are general references to Mondale Delegate Committees, and specific reference to some Delegate Committees, there are NO references to my committee or myself, as treasurer. There were no allegations made against me or my committee. As a result, it is impossible to comment on statements that appear to have nothing to do with my committee.

I would be happy to cooperate in resolving this matter if I understood how it would pertain to my committee. I am assuming that my committee has no filing requirements because it did not reach the $1,000.00 threshold and thus there was no legal need for a committee. If I need to write a letter to this effect, to formally terminate the committee, please contact me.

8504050069

Assuming that I am correct, the issue of commenting on the complaint is **MOOT**.

If, however, you feel there would be a need to comment on the complaint, I am not clear as to what in the complaint would require a response since there is no reference to my committee or myself, as treasurer.

Thank you for your cooperation.

Sincerely,

Ronald V. Iaboni
Treasurer, Lower Hudson
Delegates for Mondale

8504050107 0

ld V. Iaboni
sher Drive
t Vernon, New York 10552

RECEIVED AT THE FEC
84 MAY 29 PM 12:55

Lawrence M. Noble, Deputy General Counsel
Federal Election Commission
Washington, D.C. 20463

CERTIFIED
No. 323658
MAIL

RETURN RECEIPT
REQUESTED

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ronald V. Iaboni, Treasurer
Lower Hudson Delegates For
Mondale
1 Fisher Drive
Mt. Vernon, NY 10552

Re: MUR 1667

Dear Mr. Iaboni:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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8504050107

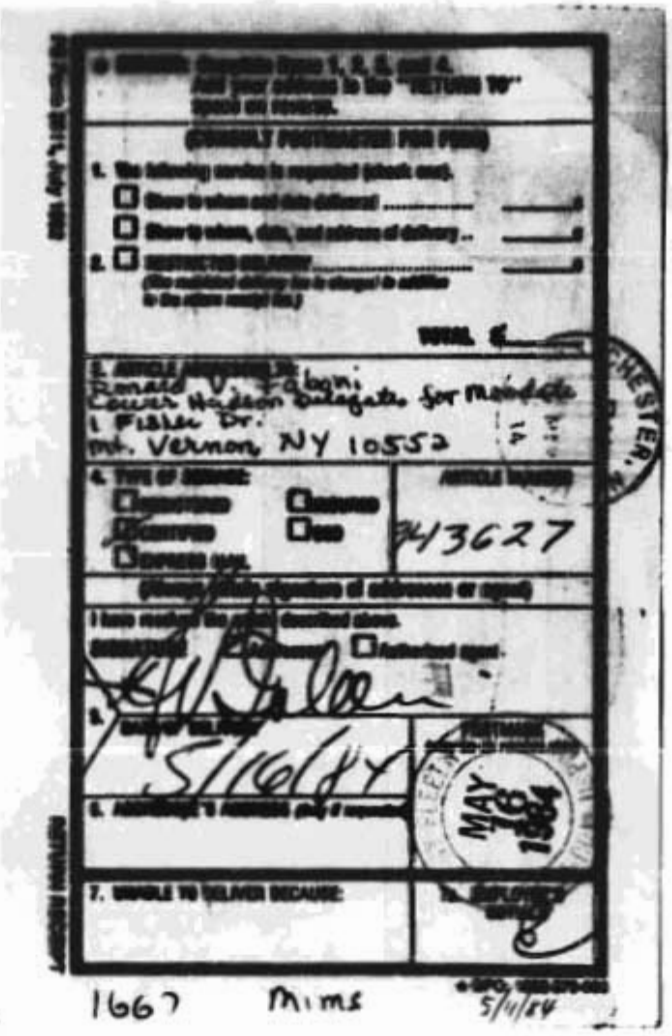
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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



8504050073

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Jurgen Worthing, Treasurer
Long Island Mondale Committee
75 Weaving Lane
Wantagh, NY 11793

Re: MUR 1667

Dear Mr. Worthing:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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If you intend to be represented by counsel in this matter please advise the Commission by 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.

8504050074

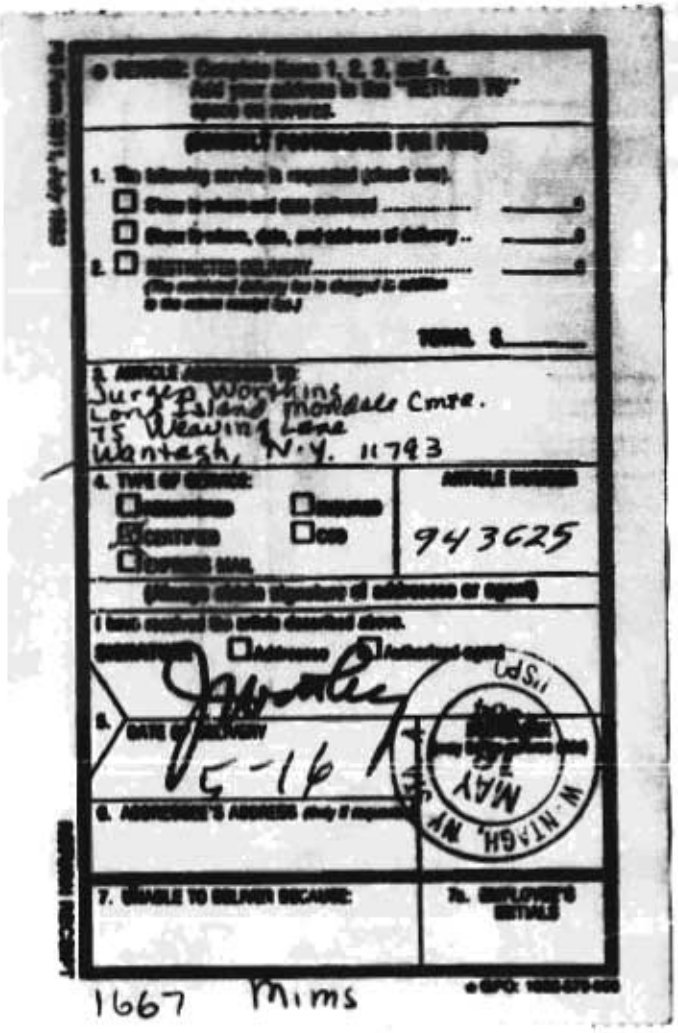
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Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

Enclosures
1. Complaint
2. Proceaures
3. Designation of Counsel Statement



8504050107 5

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Paul E. Haney, Treasurer
Haney, Mains, Rankin, Trobia,
Delegate Committee
3 Tacoma Street
Rochester, NY 14316

Re: MUR 1667

Dear Mr. Haney:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

8504050076

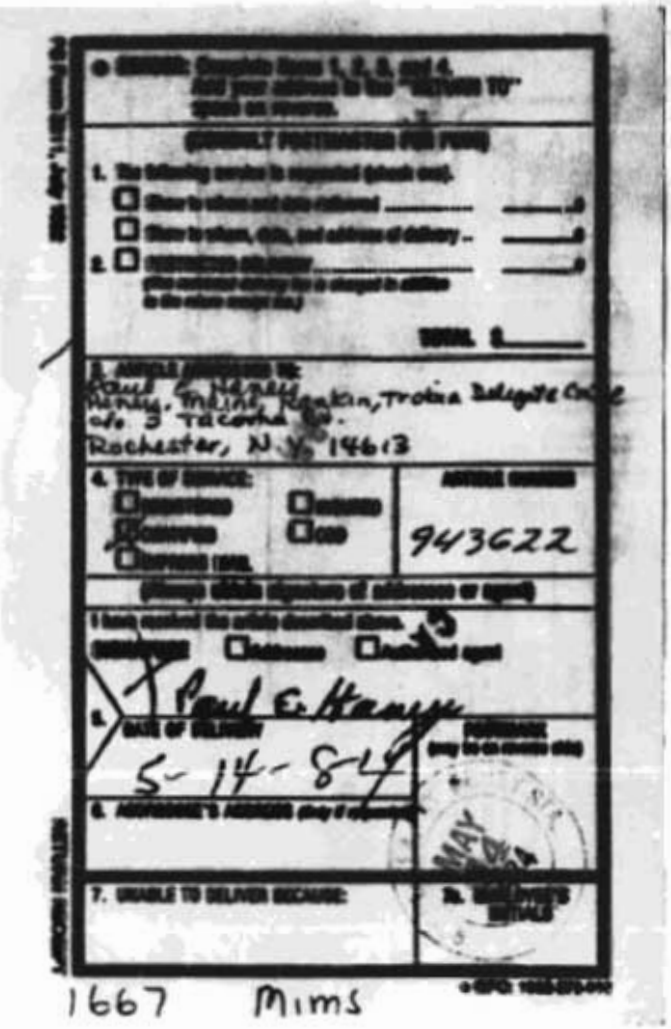
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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



8504050077

RECEIVED BY THE FEC
FCC#2620
84 JUN 14 P12:38

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1667

NAME OF COUNSEL: TIMOTHY J TOOHEY

ADDRESS: 110 TILLINGHAST PL.
BUFFALO NY
14216

TELEPHONE: 716-855-7235

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.

6/6/84
Date

Kenneth C. Kruly
Signature

RESPONDENT'S NAME: KENNETH C. KRULY

ADDRESS: ERIE Co. Delegates for Mondale
220 Delaware Ave
BUFFALO NY 14202

HOME PHONE:

BUSINESS PHONE: 716-855-7300

8504050107 8

J. TOOHEY
1 Ellicott Street
O. Box 5008
ffalo, N.Y. 14205

84 JUN 14 P12

FEDERAL ELECTION COMMISSION
Washington, D.C. 20463

8504037107

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Kenneth C. Kruly, Treasurer
Erie County Delegates For
Mondale
220 Delaware Avenue
Buffalo, NY 14202

Re: MUR 1667

Dear Mr. Kruly:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

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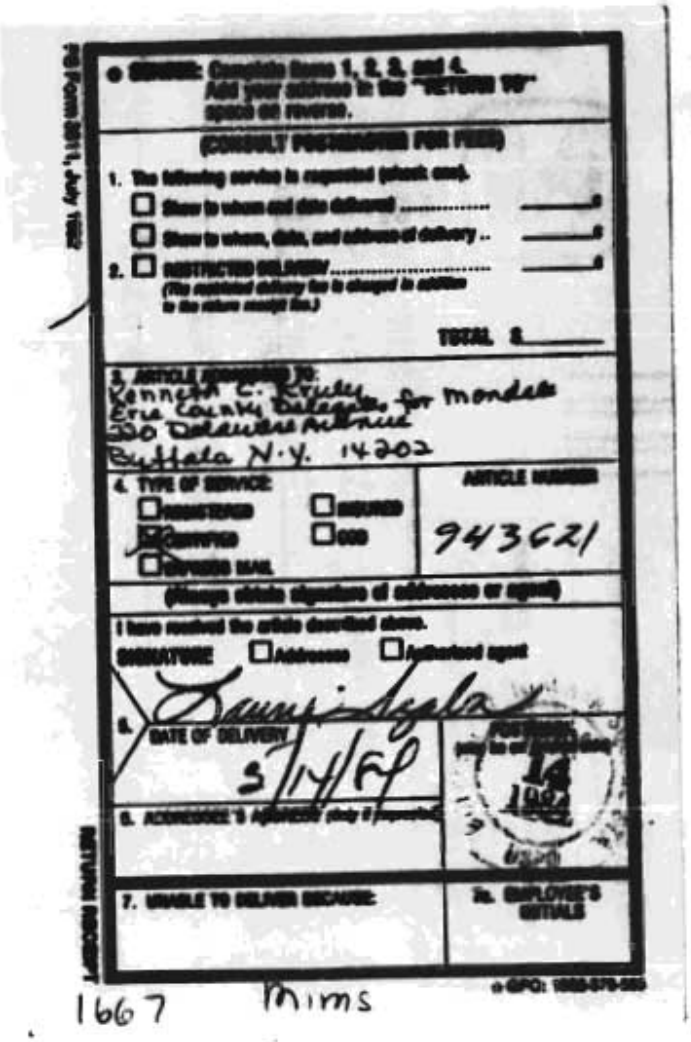
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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



1667 Mims

8504050081

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1704

NAME OF COUNSEL: Davidson, Fink, Cook & Gates

ADDRESS: 900 First Federal Plaza
Rochester, New York 14614

TELEPHONE: (716) 546-6448

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.

6/28/84
Date

Signature
Thomas A. Fink

RESPONDENT'S NAME: Committee for Western New York Mondale Delegates

ADDRESS: 900 First Federal Plaza
Rochester, New York 14614

HOME PHONE:

BUSINESS PHONE: (716) 546-6448

8504050082

RECEIVED BY THE FEC
Gatt 3890
84 JUL 2 AM 11:17

DAVIDSON, FINK, COOK AND GATES
ATTORNEYS AND COUNSELORS AT LAW
900 FIRST FEDERAL PLAZA
ROCHESTER, NEW YORK 14614
(716) 546-6448

S. GERALD DAVIDSON
THOMAS A. FINK
STUART M. COOK
DOUGLAS S. GATES
GREGORY J. MOTT

MICHAEL J. KIEFFER
SUSAN WORDEN ALLPORT
ANTHONY J. ADAMS, JR.

June 28, 1984

Charles N. Steele, General Counsel
Attn: Kenneth A. Gross, Associate
General Counsel
Federal Election Commission
Washington, D. C. 20463

Re: MUR 1704

Dear Mr. Gross:

I enclose a copy of a letter to Lawrence M. Noble, Deputy General Counsel, which outlines our response to a complaint filed against the Mondale Campaign which apparently includes the Delegate Committee of which I was treasurer. Since the charges are essentially the same, I assume at some point they will be combined and, therefore, I take the liberty of enclosing the letter we sent previously.

There have been no changes since the letter of May 24, 1984. I have paid no bills and received no pack money.

The Committee was set up to provide a place for delegates to meet and work out of and the only bills planned to be paid are a telephone bill and some rent, once we can get the bills settled.

If you have any questions, please do not hestiate to contact me. I will assume that the complaint against my Committee will be dismissed forthwith.

Very truly yours,

DAVIDSON, FINK, COOK & GATES

Thomas A. Fink

TAF/khw

8504038

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1704

NAME OF COUNSEL: Davidson, Fink, Cook & Gates

ADDRESS: 900 First Federal Plaza
Rochester, New York 14614

TELEPHONE: (716) 546-6448

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.

6/28/84
Date

Signature
Thomas A. Fink

RESPONDENT'S NAME: Committee for Western New York Mondale Delegates

ADDRESS: 900 First Federal Plaza
Rochester, New York 14614

HOME PHONE:

BUSINESS PHONE: (716) 546-6448

8504050108 1

File

DAVIDSON, FINK, COOK AND GATES
ATTORNEYS AND COUNSELORS AT LAW
900 FIRST FEDERAL PLAZA
ROCHESTER, NEW YORK 14614
(716) 546-6440

G. GERALD DAVIDSON
THOMAS A. FINK
STUART M. COOK
DOUGLAS S. GATES
GREGORY J. MOTT
SUSAN WARREN ALLPORT

ANTHONY J. ADAMS, JR.
ANN M. KERWICK*
*ALSO ADMITTED IN FLORIDA

May 24, 1984

Lawrence M. Noble,
Deputy General Counsel
Federal Election Commission
Washington, D. C. 20463

Re: MUR 1667

Dear Mr. Noble:

We have received a letter dated May 11, 1984, received May 14, 1984, indicating that the Committee of which I am the Treasurer, the Committee for Western New York Mondale Delegates, may have committed certain violations of the Federal Election Campaign Act of 1971 as amended. I enclose a Notice of Appearance of our firm as representing the Committee.

It is our belief that the complaint, as it refers to our Committee, is without any factual or legal foundation. The Committee was formed after the delegate candidates were notified by the Mondale Campaign that the Mondale Campaign would not supply or finance a meeting place or telephone for the use of the delegates in their campaign. I was informed that a group of delegates in the Monroe County area had formed a Delegate Committee to assist them in their campaign. It was decided that, in order for the other delegates in the 29th Congressional District to have an opportunity to compete, a Delegate Committee should be formed so as to assist them in raising funds to have a meeting place and telephone for their use.

To date, less than $1,000 has been raised for the Delegate Committee. No PAC contributions were solicited by me nor have any been received by the Committee.

No campaign literature of any sort was either ordered by nor paid for by the Committee.

8504050108

I have subsequently checked and found that none of the individual contributors have, even if their other contributions to the Mondale Campaign were included, contributed more than $1,000 for the benefit of Mondale delegates or Vice President Mondale's campaign.

I have received notification from the Mondale for President, Inc. campaign urging the Committee to discontinue its activities and to take other actions so as to permit the Mondale for President, Inc. Committee to consider what effect our Delegate Committee's activities had on their campaign. While the Committee believes that it is independent of the Mondale for President, Inc. Campaign Committee, it had previously determined that no further activities would occur after April 3, 1984, other than the payment of any bills that it had authorized.

It is not determined at the present time as to whether the Committee will be required to report based upon the amount of contributions that it has received. However, all records of the Committee will be preserved for the inspection of either the Mondale for President, Inc. Campaign Committee or the Federal Election Commission.

I have reviewed, in detail, the Federal Election Campaign Act and can find no possible violation of the Act by the Committee of which I am the Treasurer. It is thus requested that the Commission discontinue our Committee as a part of any further investigation.

Very truly yours,

DAVIDSON, FINK, COOK & GATES

Thomas A. Fink

TAF/khw
Enclosure
cc: Mondale for President, Inc. Committee
2201 Wisconsin Avenue #100
Washington, D.C. 20007

bcc: Mr. Laurence Kirwan

8504050108 5

VIDSON, FINK, COOK & GATES
350 FIRST FEDERAL PLAZA
ROCHESTER, NEW YORK 14614



Charles N. Steele, General Counsel
Attn: Kenneth A. Gross, Associate
General Counsel
Federal Election Commission
Washington, D. C. 20463

RECEIVED AT THE FEC
Cat # 3339
84 MAY 29 A8:58

DAVIDSON, FINK, COOK AND GATES
ATTORNEYS AND COUNSELORS AT LAW
800 FIRST FEDERAL PLAZA
ROCHESTER, NEW YORK 14614
(716) 546-6440

S. GERALD DAVIDSON
THOMAS A. FINK
STUART M. COOK
DOUGLAS S. GATES
GREGORY J. MOTT
SUSAN WORDEN ALLPORT

ANTHONY J. ADAMS, JR.
ANN M. KERWICK*
*ALSO ADMITTED IN FLORIDA

MUR 1667
Memo

84 MAY 29 P10:18

May 24, 1984

Lawrence M. Noble,
Deputy General Counsel
Federal Election Commission
Washington, D. C. 20463

Re: MUR 1667

Dear Mr. Noble:

We have received a letter dated May 11, 1984, received May 14, 1984, indicating that the Committee of which I am the Treasurer, the Committee for Western New York Mondale Delegates, may have committed certain violations of the Federal Election Campaign Act of 1971 as amended. I enclose a Notice of Appearance of our firm as representing the Committee.

It is our belief that the complaint, as it refers to our Committee, is without any factual or legal foundation. The Committee was formed after the delegate candidates were notified by the Mondale Campaign that the Mondale Campaign would not supply or finance a meeting place or telephone for the use of the delegates in their campaign. I was informed that a group of delegates in the Monroe County area had formed a Delegate Committee to assist them in their campaign. It was decided that, in order for the other delegates in the 29th Congressional District to have an opportunity to compete, a Delegate Committee should be formed so as to assist them in raising funds to have a meeting place and telephone for their use.

To date, less than $1,000 has been raised for the Delegate Committee. No PAC contributions were solicited by me nor have any been received by the Committee.

No campaign literature of any sort was either ordered by nor paid for by the Committee.

8504050088

I have subsequently checked and found that none of the individual contributors have, even if their other contributions to the Mondale Campaign were included, contributed more than $1,000 for the benefit of Mondale delegates or Vice President Mondale's campaign.

I have received notification from the Mondale for President, Inc. campaign urging the Committee to discontinue its activities and to take other actions so as to permit the Mondale for President, Inc. Committee to consider what effect our Delegate Committee's activities had on their campaign. While the Committee believes that it is independent of the Mondale for President, Inc. Campaign Committee, it had previously determined that no further activities would occur after April 3, 1984, other than the payment of any bills that it had authorized.

It is not determined at the present time as to whether the Committee will be required to report based upon the amount of contributions that it has received. However, all records of the Committee will be preserved for the inspection of either the Mondale for President, Inc. Campaign Committee or the Federal Election Commission.

I have reviewed, in detail, the Federal Election Campaign Act and can find no possible violation of the Act by the Committee of which I am the Treasurer. It is thus requested that the Commission discontinue our Committee as a part of any further investigation.

Very truly yours,

DAVIDSON, FINK, COOK & GATES

Thomas A. Fink

Thomas A. Fink

TAF/khw
Enclosure
cc: Mondale for President, Inc. Committee
2201 Wisconsin Avenue #100
Washington, D.C. 20007

8504050089

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1667

NAME OF COUNSEL: Davidson, Fink, Cook & Gates

ADDRESS: 900 First Federal Plaza
Rochester, New York 14614

TELEPHONE: (716) 546-8426

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.

5/24/84
Date

DAVIDSON, FINK, COOK & GATES
Davidson, Fink, Cook & Gates
Signature

RESPONDENT'S NAME: Committee for Western New York Mondale Delegates

ADDRESS: 900 First Federal Plaza
Rochester, New York 14614

HOME PHONE:

BUSINESS PHONE: (716) 546-6448

8504050109 0

DSON, FINK, COOK AND GATES
800 FIRST FEDERAL PLAZA
ROCHESTER, NEW YORK 14614

84 MAY 28 A8:58

Lawrence M. Noble,
Deputy General Counsel
Federal Election Commission
Washington, D. C. 20463

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Thomas A. Fink, Treasurer
Committee For Western New York
Mondale Delegates
Suite 900
First Federal Plaza
Rochester, NY 14614

Re: MUR 1667

Dear Mr. Fink:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

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

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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.

8504050092

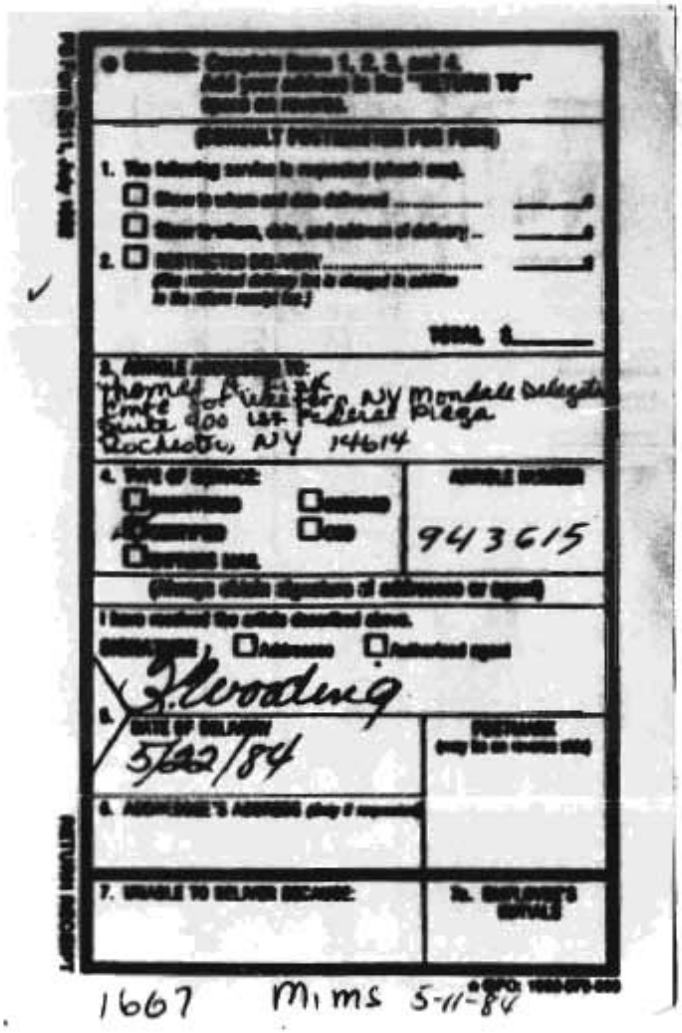
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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



8520405010093

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 19, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

The Mondale Team (32nd C.D.)
504 Witmar Road
N. Tonawanda, NY 14120

Re: MUR 1704

Dear Sir or Madam:

This letter is to notify you that on May 18, 1984 the Federal Election Commission received a complaint which alleges that the committee and its treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1704. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

8504050094

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. 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

8504050109 5

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 19, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

West New York Elect Mondale
Committee - 31st C.D.
201 Presidel Place
Williamsville, NY 14221

Re: MUR 1704

Dear Sir or Madam:

This letter is to notify you that on May 18, 1984 the Federal Election Commission received a complaint which alleges that the committee and its treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1704. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

8504050095

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. 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

8504050097

ACC 8438
RECEIVED BY THE FEC
84 JUN 4 A9:
MUR 1667
Memo

ONE CHASE MANHATTAN PLAZA
NEW YORK, N. Y. 10005

May 29, 1984

MUR 1667

Dear Mr. Noble:

I understand that you have transmitted copies of the complaint of Americans With Hart and the supplements thereto to Evelyn L. Rockas, treasurer of the 28th Congressional District Delegates for Mondale Committee, and Mary E. Gurnett, treasurer of the Naples-Mondale Delegate Slate. Please be advised that Thomas D. Barr and I have agreed to represent these committees and their respective treasurers in this matter.

Although your letters state that the complaint and supplements allege that the committees and individuals mentioned above "may have violated certain sections of the Federal Election Campaign Act of 1971, as amended," neither the complaint nor any of the supplements make reference to these committees or to these individuals. While the materials do contain certain broad statements concerning delegate committees generally, there is no way for us to know which, if any, may be intended to refer to our clients. In these circumstances, we find it very difficult to comment on behalf of these committees and their treasurers.

Our clients wish to cooperate fully with the Commission and will be pleased to answer any specific questions you may wish to put to them in aid to an appropriate investigation. If you have any such questions or requests for materials, please get in touch with me.

Very truly yours,

Ellen S. Oran

Ellen S. Oran

Lawrence N. Noble, Esq.,
Deputy General Counsel,
Federal Election Commission,
1325 K Street, N.W.,
Washington, D.C. 20463

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-PM
8 JUN
A9

Lawrence N. Noble, Esq.,
Deputy General Counsel,
Federal Election Commission,
1325 K Street, N.W.,
Washington, D.C. 20463

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Evelyn L. Rockas, Treasurer
28th Congressional District
Delegates For Mondale Committee
P.O. Box 61
Ithaca, NY 14851

Re: MUR 1667

Dear Ms. Rockas:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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If you intend to be represented by counsel in this matter please advise the Commission by 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.

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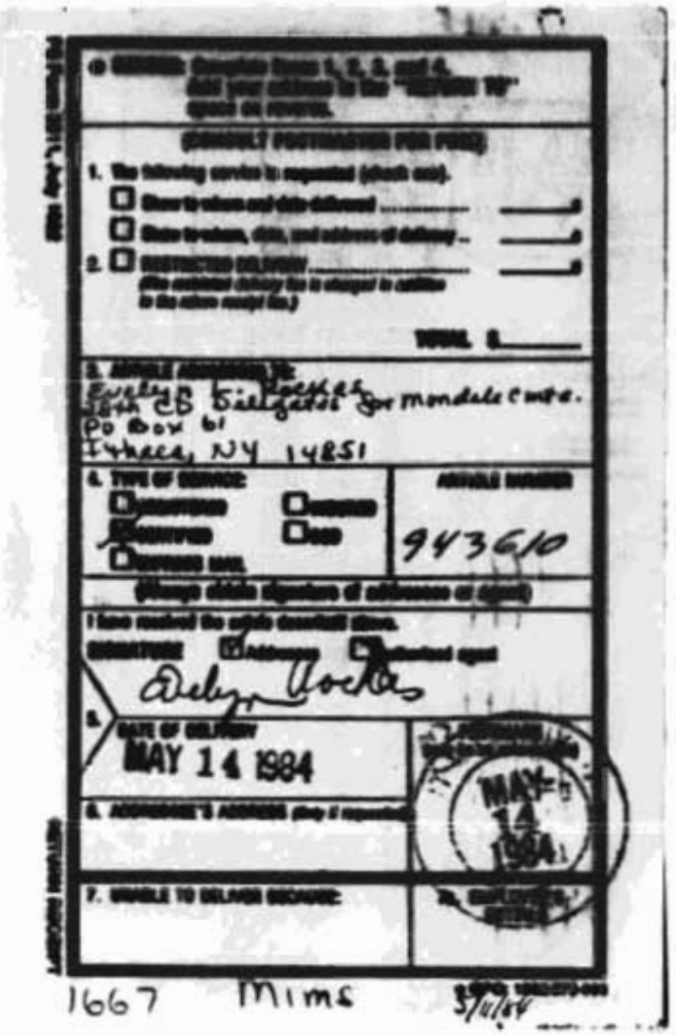
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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



8504050111

RECEIVED AT THE FEC

84 AUG 3 A8:38

KATE ROSENTHAL
ATTORNEY AND COUNSELOR AT LAW
SUITE 800
THE HILLS BUILDING
SYRACUSE, NEW YORK 13202
315-471-0126

GCC #4254

July 31, 1984

Stephen Mims, Esq.
Federal Election Commission
Washington, DC 20463

RE: MUR 1667, 1704

Dear Mr. Mims:

I have been asked to respond on behalf of the 27th Congressional District Delegates for Mondale Committee and their treasurer, John McAuliffe, to two FEC complaints which they received, i.e. MUR 1667 and MUR 1704.

Although both complaints allege numerous violations of the Federal Election Campaign Act of 1971 there is nothing contained within them which specifically names the 27th Congressional District Delegates Committee or Mr. McAuliffe. Since the Complaints are replete with broad statements of alleged violations but contain no specific instances of misconduct charged to the 27th Congressional District Delegates Committee or Mr. McAuliffe, it would be premature for them to comment on the allegations contained within those complaints at this time.

My clients are more than willing to cooperate with the Federal Election Commission in any appropriate investigation of these matters. To that end, please feel free to contact me should you wish to discuss these matters more fully with them.

Very truly yours,

Kate Rosenthal

KATE ROSENTHAL

KR/dc

8504011092

: ROSENTHAL
Y AND COUNSELOR AT LAW
SUITE 800
E HILLS BUILDING
USE, NEW YORK 13202

SYRACUSE NY
84 AUG 3

Stephen Mims, Esq.
Federal Election Commission
Washington, DC 20463

Ga#3173

RECEIVED
FEC

KATE ROSENTHAL
ATTORNEY AND COUNSELOR AT LAW
SUITE 800
THE HILLS BUILDING
SYRACUSE, NEW YORK 13206
315-471-0126

84 JUN 26 PM 12:27

June 25, 1984

Stephen Mims, Esq.
Federal Election Commission
Washington, DC 20463

RE: MUR 1667, 1704

Dear Mr. Mims:

This will confirm our conversation this day, June 25, 1984, in which I indicated to you that I represented the 27th Congressional District for Mondale Committee in the above entitled cases. It is my understanding that you will be forwarding to me Complaint No. 1667 which our committee has yet to receive. Upon receipt of that Complaint, I will submit to the FEC an Answer to both MUR 1667 and 1704. Due to the fact that I did not receive either Complaint within 15 days from the date that they were filed with the Commission, it will be necessary for me to request a 15 day extension from the Commission in which I may submit an Answer.

Therefore, I would hereby request a 15 day extension from the date of the receipt of Complaint No. 1667 in which to sumbit both Answers. Should there be any problem with granting this extension, please let me know.

Thank you very much for your time and attention in this matter.

Very truly yours,

Kate Rosenthal

KATE ROSENTHAL

KR/dc

3504050104

Ga#3173

RECEIVED
FEC
84 JUN 28 P12:27

KATE ROSENTHAL
ATTORNEY AND COUNSELOR AT LAW
SUITE 600
THE HILLS BUILDING
SYRACUSE, NEW YORK 13206
315-471-0120

June 25, 1984

Stephen Mims, Esq.
Federal Election Commission
Washington, DC 20463

RE: MUR 1667 1704

Dear Mr. Mims:

This will confirm our conversation this day, June 25, 1984, in which I indicated to you that I represented the 27th Congressional District for Mondale Committee in the above entitled cases. It is my understanding that you will be forwarding to me Complaint No. 1667 which our committee has yet to receive. Upon receipt of that Complaint, I will submit to the FEC an Answer to both MUR 1667 and 1704. Due to the fact that I did not receive either Complaint within 15 days from the date that they were filed with the Commission, it will be necessary for me to request a 15 day extension from the Commission in which I may submit an Answer.

Therefore, I would hereby request a 15 day extension from the date of the receipt of Complaint No. 1667 in which to sumbit both Answers. Should there be any problem with granting this extension, please let me know.

Thank you very much for your time and attention in this matter.

Very truly yours,

Kate Rosenthal

KATE ROSENTHAL

KR/dc

8504050105

Z ROSENTHAL
Y AND COUNSELOR AT LAW
SUITE 600
NE WELLS BUILDING
CUSE, NEW YORK 13202

04 JUN 23

Stephen Mims, Esq.
Federal Election Commission
Washington, DC 20463

C04

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

John E. McAuliffe, Treasurer
27th Congressional District
Delegates For Mondale
236 Erie Boulevard East
Syracuse, NY 13202

Re: MUR 1667

Dear Mr. McAuliffe:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

8504050107

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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

8504050108

RECEIVED AT THE FEC
Gatt 3582
84 JUN 12 PM 2:38

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1667

NAME OF COUNSEL: Carol Darr

ADDRESS: Skadden, Arps, Slate, Meagher & Flom
919 18th St. N.W.
Washington, D.C. 20006

TELEPHONE: 202-463-8700

12 PM 2:00

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.

6/8/84
Date

Francis J. Kelly
Signature

RESPONDENT'S NAME: Delegates for Mondale 25th District

ADDRESS: 1 Hartford Terrace
New Hartford, N.Y. 13413

HOME PHONE: 315-733-2126

BUSINESS PHONE:

The filing of this designation of counsel form should not be construed as a waiver of any rights. The committee and its officers do not consider themselves to be respondents in this matter.

8504050109

s J. Kloster
ford Terrace
rtford, NY 13413









RETURN RECEIPT
REQUESTED

CERTIFIED
P 310 079 262
MAIL

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

Conf 3303

RECEIVED AT THE FEC

84 MAY 29 A8:18

MUR 1667
Memo

MAY 29 P10:13

May 24, 1984

Lawrence M. Noble
Deputy General Counsel
Federal Election Commission
1325 K Street NW
Washington, D.C. 20463

Dear Mr. Noble:

I was asked to serve as treasurer for the committee, Delegates for Mondale 25th District, to which I agreed.

After the committee was formed, there was one mail out sent to registered Democrats in the 25th District asking for delegate support on Primary Day April 3.

I received money which I deposited in the checking account and later I received a bill for the mailing at which time I sent a check.

At this time my intention is not to be represented by counsel because I know of no wrong doing and feel the commission has no reason to take any action against the committee or me.

Sincerely,

Francis J. Kloster

Francis J. Kloster

8504050111

s for Mondale
trict
rd Terrace
ford, NY 13413



Lawrence M. Noble
Deputy General Counsel
Federal Election Commission
1325 K Street NW
Washington, D.C. 20463

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Francis J. Kloster, Treasurer
Delegates For Mondale 25th District
1 Hartford Terrace
New Hartford, NY 13413

Re: MUR 1667

Dear Mr. Kloster:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against the committee and you, as treasurer, 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.

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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.

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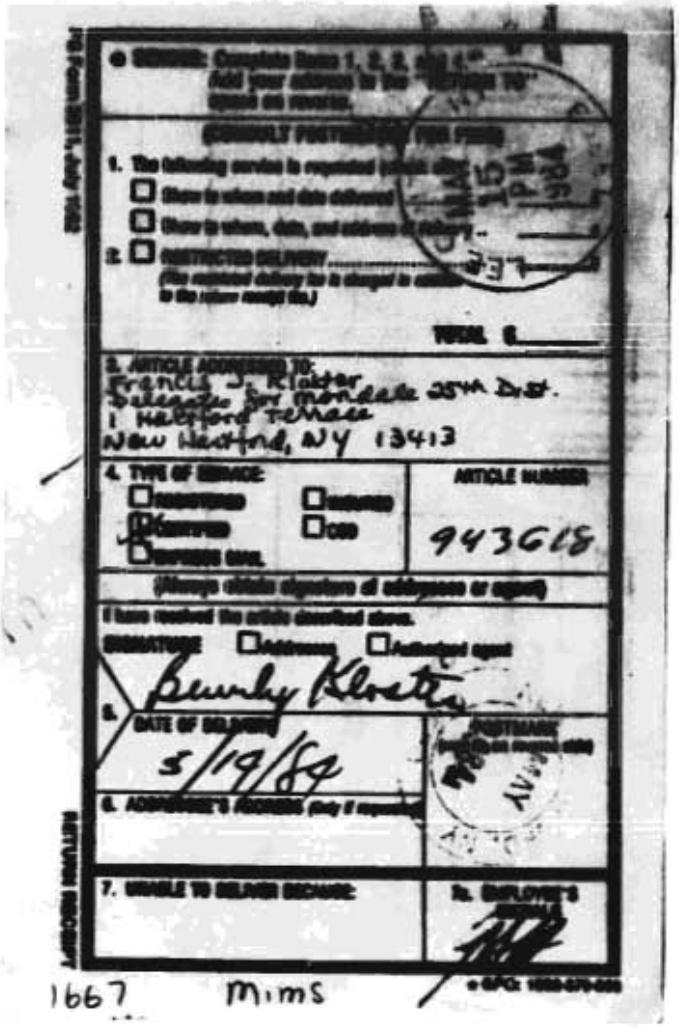
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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



8504050114

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ruben S. Gersowitz, Treasurer
23rd Congressional District
Delegates For Walter F. Mondale
11 North Pearl Street, Rm 1608
Albany, NY 12207

Re: MUR 1667

Dear Mr. Gersowitz:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

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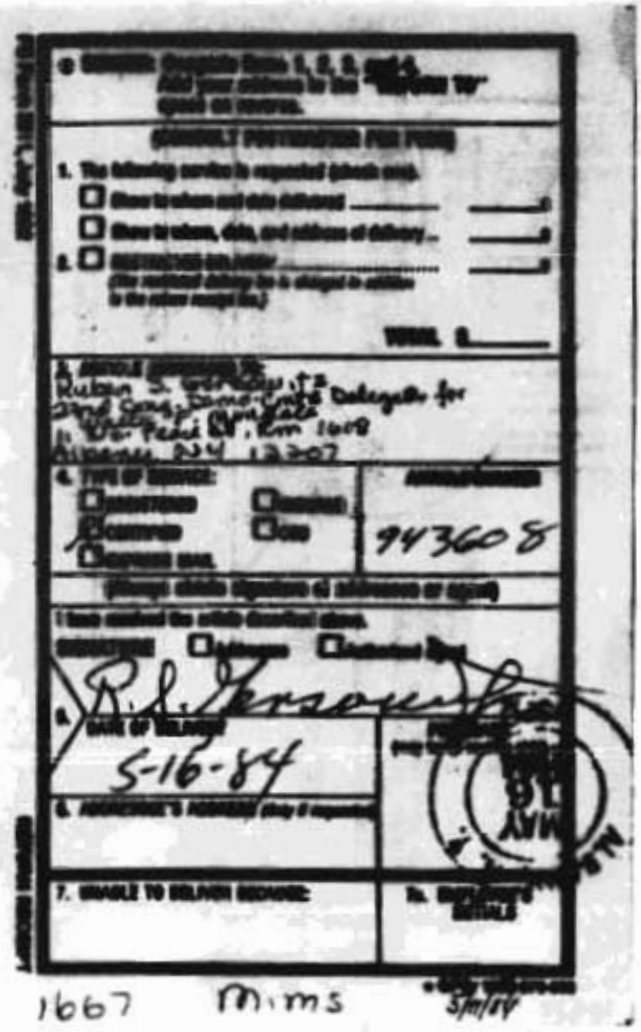
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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



8504050111 6

RECEIVED AT THE FEC
Call 3278
84 MAY 24 A9:10

ONE CHASE MANHATTAN PLAZA
NEW YORK, N. Y. 10005

May 22, 1984

mims

MUR 1667

Dear Mr. Noble:

I have your letter of May 11, 1984 to Mr. Kevin Thompson, treasurer of the 22nd Congressional District Delegates for Mondale Committee. Please be advised that Thomas D. Barr and I have agreed to represent the committee and Mr. Thompson in this matter.

Your letter to Mr. Thompson states that the complaint of Americans With Hart and the supplements thereto allege that the committee and Mr. Thompson "may have violated certain sections of the Federal Election Campaign Act of 1971, as amended." However, neither the complaint nor any of the supplements make any references to the committee or to Mr. Thompson. They do contain certain very broad statements concerning delegate committees generally, including some general references to delegate committees in New York State, but there is no way for us to know which of these, if any, may be intended to relate to our client. As I am sure you will understand, we find it very difficult to comment on these materials on behalf of the committee or Mr. Thompson in these circumstances.

The committee and Mr. Thompson wish to cooperate fully with the Commission and will be pleased to answer any specific questions you may wish to put to them in aid of an appropriate investigation. If you have any such questions or requests for material, please get in touch with me.

Very truly yours,

Ellen S. Oran

Ellen S. Oran

Lawrence N. Noble, Esq.,
Deputy General Counsel,
Federal Election Commission,
1325 K Street, N.W.,
Washington, D.C. 20463

131A

8504050117

MUR 5040

04 MAY 24 A9:47

Lawrence N. Noble, Esq.,
Deputy General Counsel,
Federal Election Commission,
1325 K Street, N.W.,
Washington, D.C. 20463

RECEIVED AT THE FEC
Doc # 3282
84 MAY 24 A9:07

ONE CHASE MANHATTAN PLAZA
NEW YORK, N.Y. 10005

mms

May 21, 1984

84 MAY 24 P10:40

MUR 1667

Dear Mr. Steele:

Mr. Barr and I have received your letter of May 15, 1984 transmitting "for our information" a copy of the May 2 "additional supplement" to the complaint of Americans With Hart. Inasmuch as you have advised us that the Commission has refused our request for an extension of time to respond to the complaint and the complainant's first two "supplements" thereto, and this latest "additional supplement" was sent to us after our time to respond had expired, we are not certain what to make of, or to do with, this document.

Very truly yours,

Ellen S. Oran

Ellen S. Oran

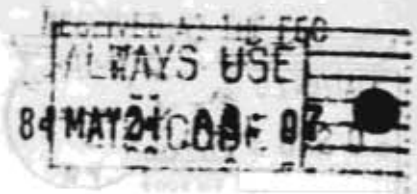
Charles N. Steele, Esq.,
General Counsel,
Federal Election Commission,
1325 K Street, N.W.,
Washington, D.C. 20463

131A

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

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Kevin Thompson, Treasurer
22nd Congressional District
Delegates For Mondale
130 North Main Street
New City, NY 10956

Re: MUR 1667

Dear Mr. Thompson:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

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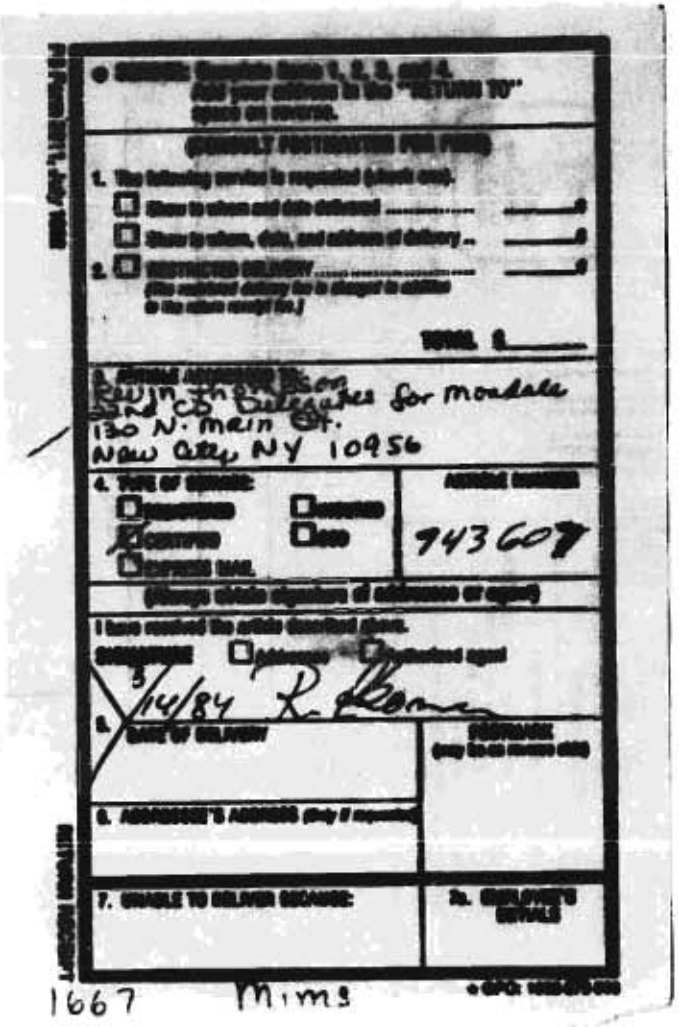
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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



8504050122

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Stephen J.Wing, Treasurer
21st District Friends Of
Walter Mondale Delegates
94 Market Street
P.O. Box 910
Poughkeepsie, NY 12602

Re: MUR 1667

Dear Mr. Wing:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

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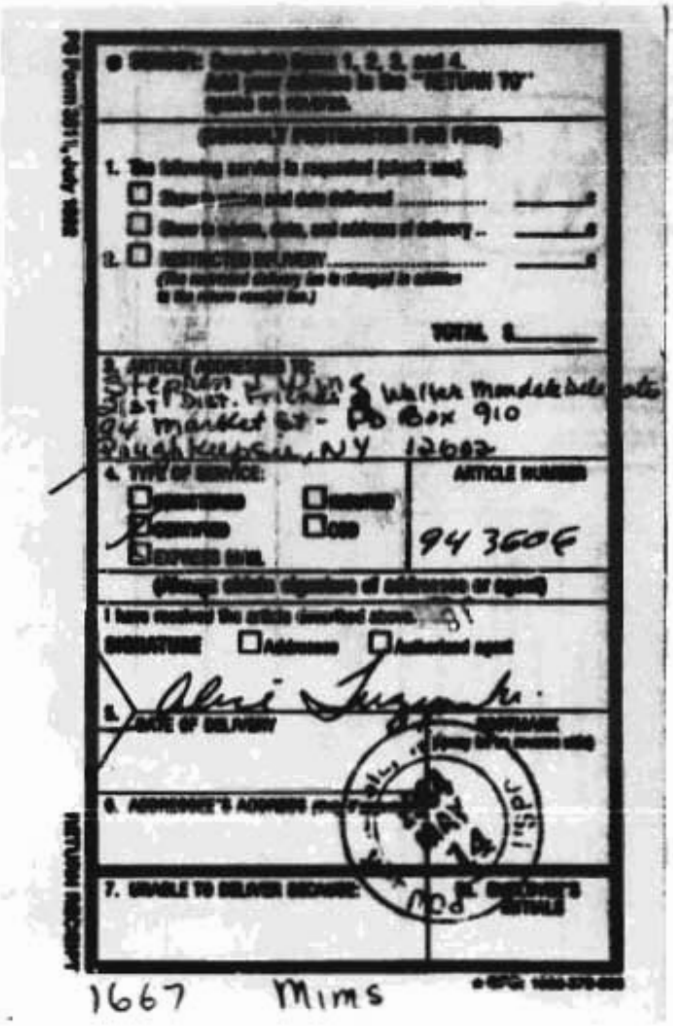
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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



8504050124

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Joseph Miller, Treasurer
Mondale 19th CD Delegate
Committee
100-7 Alcott Place
Bronx, NY 10475

Re: MUR 1667

Dear Mr. Miller:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

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

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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.

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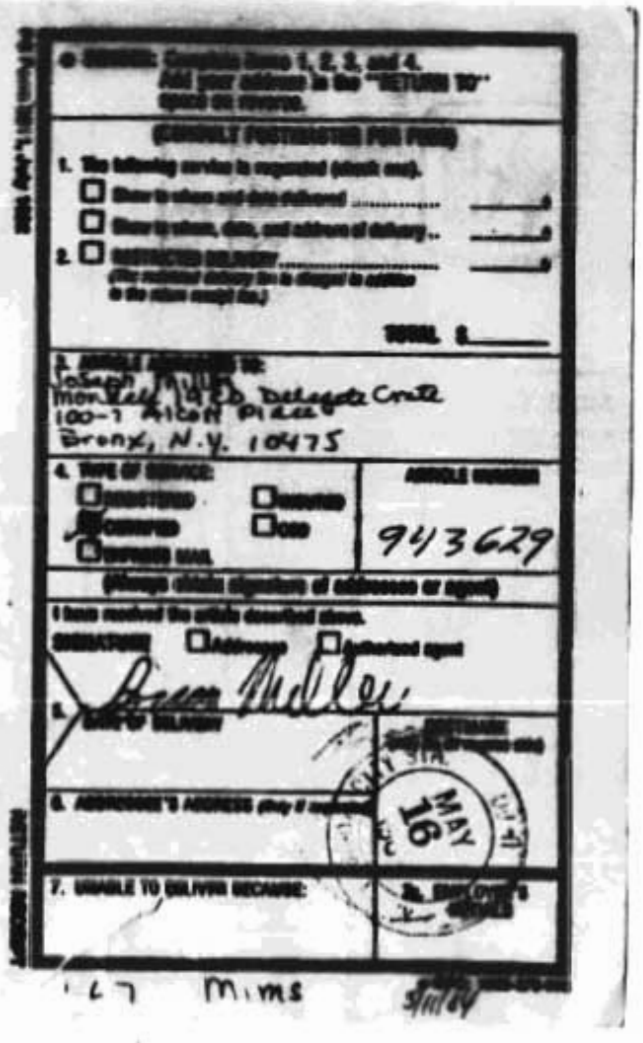
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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



8504050126

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 19, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

18th C.D. Delegate Committee
for Mondale
888 Grand Concourse
Bronx, NY 10451

Re: MUR 1704

Dear Sir or Madam:

This letter is to notify you that on May 18, 1984 the Federal Election Commission received a complaint which alleges that the committee and its treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1704. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

8504050127

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. 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

8504050128

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Elizabeth Bolden, Treasurer
Mondale 17th CD Delegate
Committee
48A Hampton Place
Brooklyn, NY 11213

Re: MUR 1667

Dear Ms. Bolden:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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If you intend to be represented by counsel in this matter please advise the Commission by 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.

8504050129

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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

8504050130

RECEIVED AT THE FEC
Doc# 3788
84 JUN 25 P1:30

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1667

NAME OF COUNSEL: Ms. Carol Darr

ADDRESS: Skadden, Arps, Flate, Magher and Flom
919 18th Street, N.W.
Washington, D.C. 20006

TELEPHONE: (202) 463-8700

84 JUN 25 P3:12

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.

6/20/84
Date

Signature Heyward B. Davenport

NY
16th

RESPONDENT'S NAME: The filing of this form should not be construed as a waiver of any rights. The Committee and its' members do not consider themselves to be respondants in these matters.

ADDRESS:

HOME PHONE:

BUSINESS PHONE:

8504013 1

yward B. Davenport
ifth Avenue - #2R
rk, NY 10029



Mr. Lawrence M. Noble
Deputy General Counsel
Federal Elections Commission
1325 K. Street N.W.
Washington, DC 20463

CERTIFIED
P 567 314 849
MAIL

RETURN RECEIPT REQUESTED

ION: Mr. Stephen Hims

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Heyward Davenport, Treasurer
16th C D Delegates For Mondale
1270 Fifth Avenue - 2R
New York, NY 10029

Re: MUR 1667

Dear Mr. Davenport:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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8504050133

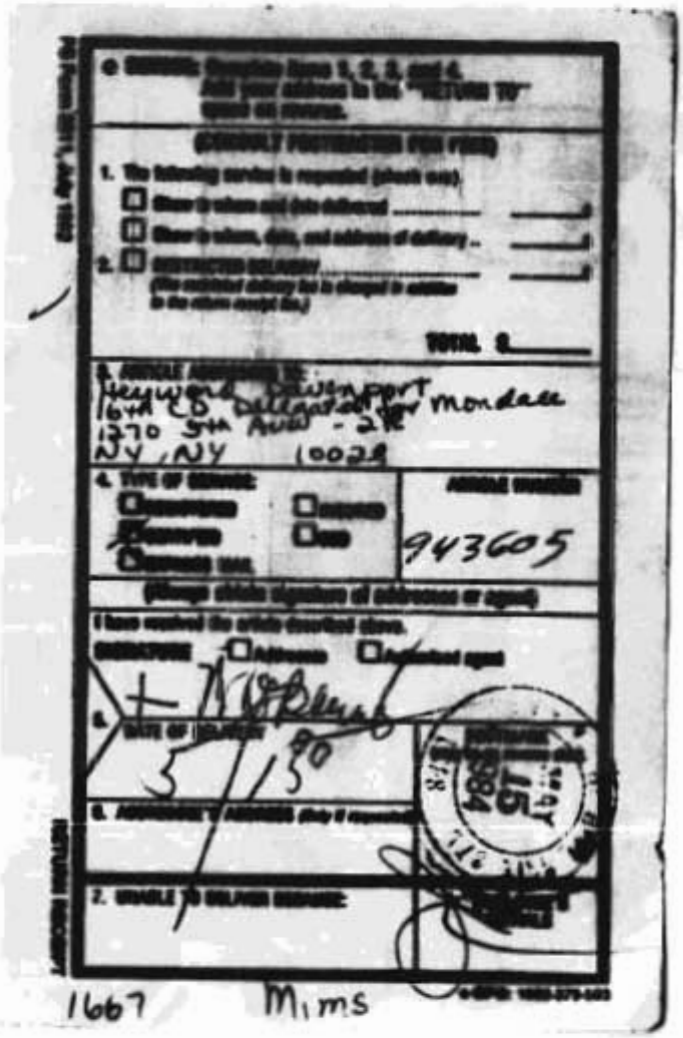
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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



8504050134

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 19, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

15th C.D. Delegates Coalition
for Mondale
235 East 87th Street
New York, NY 10028

Re: MUR 1704

Dear Sir or Madam:

This letter is to notify you that on May 18, 1984 the Federal Election Commission received a complaint which alleges that the committee and its treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1704. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

8504050135

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. 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

8504050136

6CC3663

RECEIVED BY THE FEC
JUN 18 P12:50

Delegates for Mondale Kings-
Richmond 14th C.D. Committee
157 Prescott Avenue
Staten Island, New YOrk 10306
June 11, 1984

Mr. Stephen Mims, Esq.
Federal Election Commission
1325 K Street N.W.
Washington, D.C. 20463

JUN 18 P3:27

Dear Mr. Mims:

On May 31, 1984, I received notification by the Federal Election Commission of a complaint and supplement filed by the National Right to Work Committee and Ralph Martin (Bud) Hettinga, Jr. against the Mondale for President Campaign Committee.

After reading those documents carefully I can find no specific questions relating to the activities of the Delegates for Mondale Kings-Richmond 14th C.D. Committee. (FEC reference number MUR 1667).

Further, the committee has not been named as a respondent in the action.

Although willing to cooperate in this matter, I can find nothing in the aforementioned documents pertinent to the activities of the committee.

Very truly yours,

Mary Ellen Hunold

Mary Ellen Hunold
Treasurer - Delegates for Mondale
Kings - Richmond 14th C.D. Comm.

Robert W. Olivari, Jr.
Assistant Treasurer - Delegates
for Mondale Kings - Richmond
14th C.D. Committe

Robert W. Olivari, Jr.

8504050137

legates for Mondale
gs-Richmond 14th C.D. Committee
Prescott Avenue
ten Inland, New York 10306



Mr. Stephen Mims, esq.
Federal Election Commission
1325 K Screet N.W.
Washington, D.C. 20463

Stephen Mims

5405011738

RECEIVED AT THE FEC

84 MAY 29 PM: 07

157 Prescott Avenue
Staten Island, New York 10306

May 24, 1984

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

MUR 1667
Mims

Dear Mr. Mims:

On May 11, 1984 I received notification by the Federal Election Commission of a complaint and supplements filed by the Hart campaign against the Mondale campaign (FEC reference number MUR 1667).

After reading those documents carefully I can find no specific questions relating to the activities of the Delegates for Mondale Kings - Richmond 14th C.D. Committee. Further, the committee has not been named as a respondent in the action.

Although willing to cooperate in this matter, I can find nothing in the aforementioned documents pertinent to the activities of the committee.

Very truly yours,

Mary Ellen Hunold

Mary Ellen Hunold
Treasurer - Delegates for Mondale Kings Richmond 14th C.D. Committee

Robert W. Olivari, Jr.
Assistant Treasurer

8504050139

37 Prescott Avenue
Staten Island, New York 10306

STATEN ISLAND, NY
1 PM
25 MAY 1984
81 MAY 28

20c

Mr. Stephen Mims, esq.
Federal Election Commission
1325 K Street N.W.
Washington, D.C. 20463

5040501140

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mary Ellen Hunold, Treasurer
Delegates For Mondale-King/
Richmond 14th C D
157 Prescott Avenue
Staten Island, NY 10306

Re: MUR 1667

Dear Ms. Hunold:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

8504050141

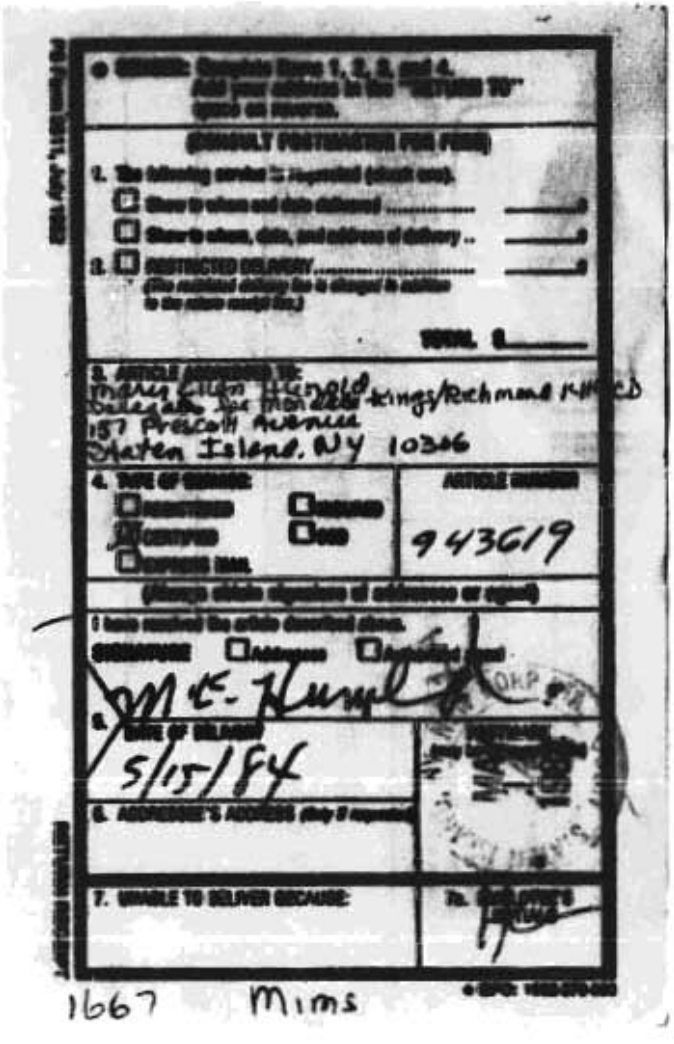
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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



8504050142

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Barbara Capon, Treasurer
Delegates For Mondale 13th
C D Kings/Richmond
2940 Ocean Parkway
Brooklyn, NY 11235

Re: MUR 1667

Dear Ms. Capon:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

8504050143

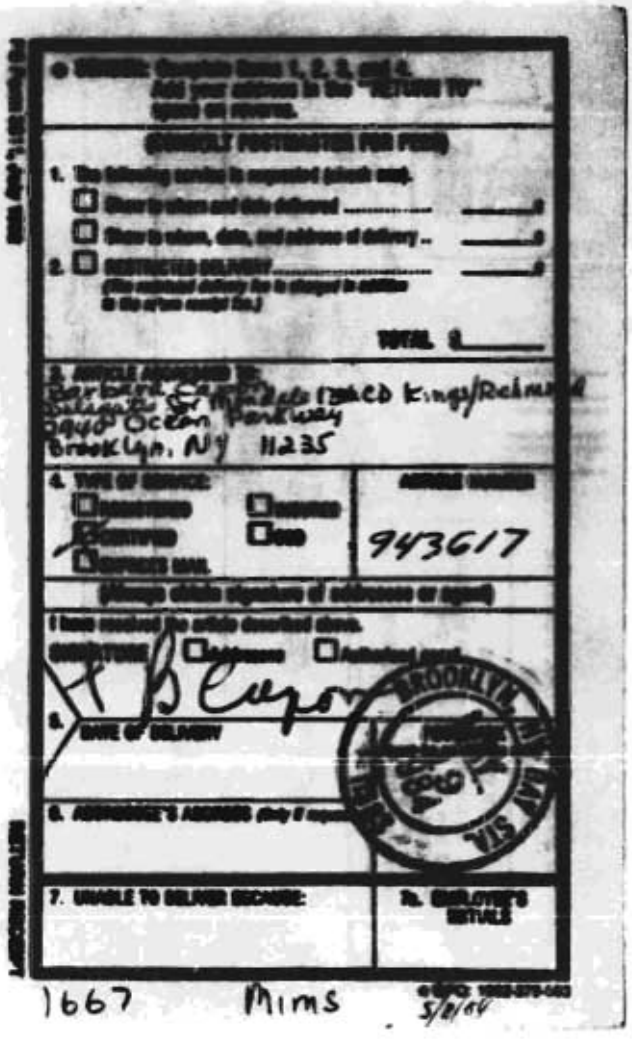
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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



8504050144

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

William Steinman, Treasurer
Delegates For Mondale 12th
C D Kings/Richmond
2044 E. 18th Street
Brooklyn, NY 11229

Re: MUR 1667

Dear Mr. Steinman:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

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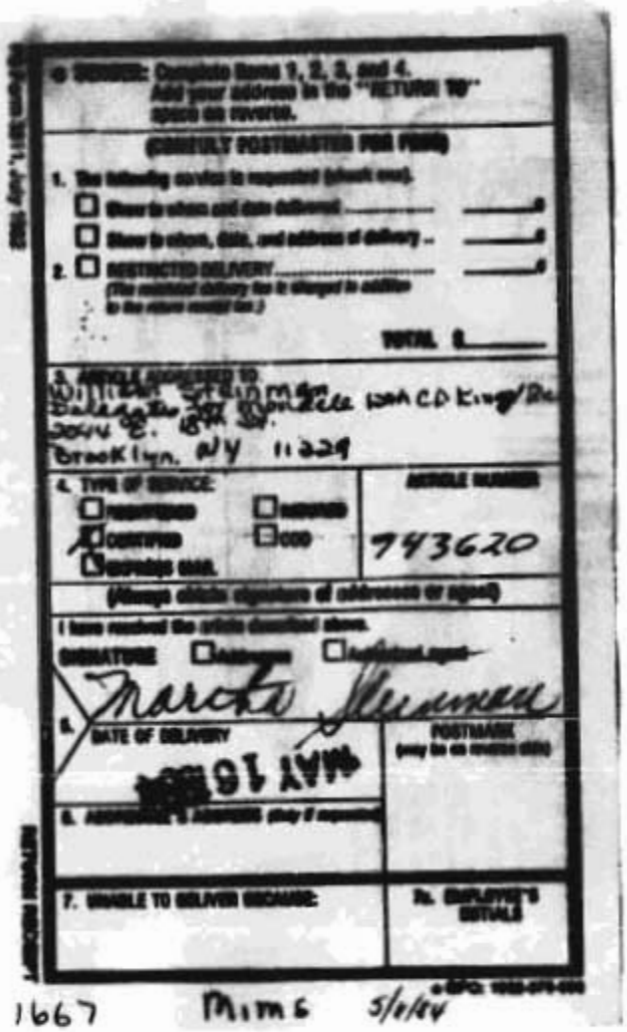
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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



1667 Mims 5/16/84

8504050146

FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Lawrence Rosenweiz, Treasurer
Delegates For Mondale - Kings/
Richmond 11th C D
274 Lafayette Avenue
Brooklyn, NY 11238

Re: MUR 1667

8504050147

Dear Mr. Rosenweiz:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

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

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

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

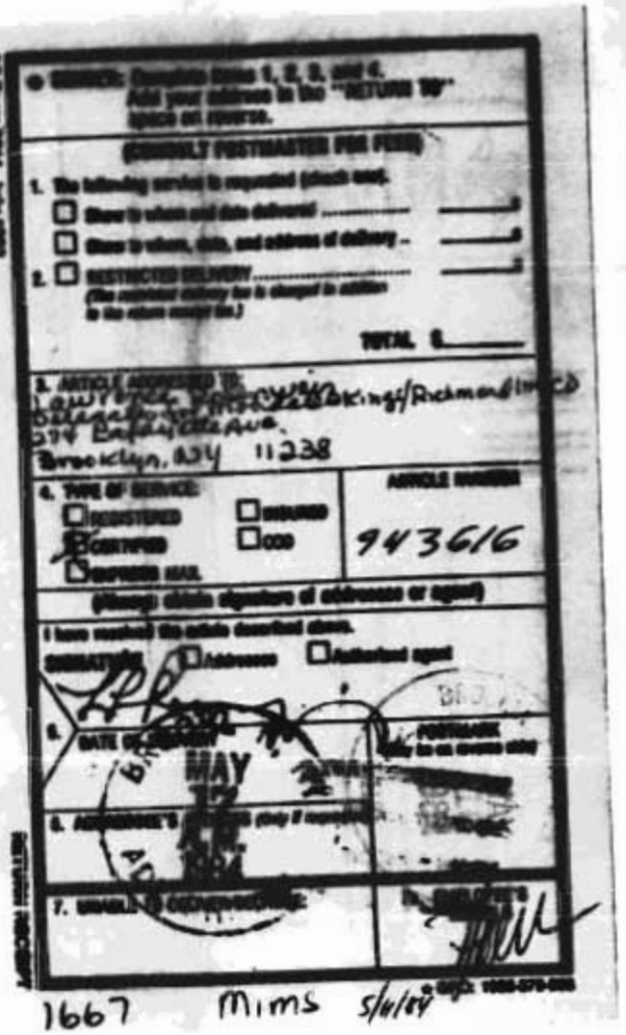
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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



8504050148

LCC 3667
RECEIVED AT THE FEC
84 JUN 18 P1:38
JUN 18 P3:26

June 13, 1984

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

RE: MUR 1704

Gentlemen;-

This letter is in response to your correspondence of May 29, 1984 as it relates to reference MUR 1704.

I have reviewed the material enclosed, and find nothing that would cause me to alter my statement as indicated in the attached letter dated May 31, 1984, as it pertains to MUR 1667.

Very truly yours,

Steven D. Goldenkranz
10th C.D. Delegates Committee
for Mondale
1551 East 23rd Street
Brooklyn, N.Y. 11210

8504050149

May 31, 1984

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

RE: MUR 1667

Gentlemen:-

This letter is in response to your corresponsence of May 11,1984 as it relates to reference MUR 1667.

I believe that no action should be taken against me or the 10th Congressional District Delegate Committee for Mondale. I saw nothing in the complaint enclosed with your correspondence that makes any specific charges against either the Committee nor myself, acting as Treasurer of said Committee.

All of the required reports have been filed, on time, in concurrence with F.E.C. regulations (including the termination report which you have not accepted). These reports properly reflect the activity of the Committee.

Therefore, in the absence of any specific charges against the Committee or myself as Treasurer, I do not intend to be represented by Counsel in this matter.

Very truly yours,

Steven Goldenkranz

Steven Goldenkranz
10th C.D. Delegates Committee
for Mondale
1551 East 23 Street
Brooklyn, New York 11210

8504050150

Steven D. Goldenkranz
10th C.D. Delegates Committee
for Mondale
155 East 23rd Street
Brooklyn, N.Y. 11210

NEW YORK, NY EMPIRE STATE JFK
JUN 18 1984
USPS

84 JUN 18 P 1

RETURN RECEIPT
REQUESTED

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

CERTIFIED
P 699 404 307
MAIL

RECEIVED AT THE FEC
84 JUN 7 AM 11:36

May 31, 1984

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

RE: MUR 1667

Gentlemen:-

This letter is in response to your corresponsence of May 11,1984 as it relates to reference MUR 1667.

I believe that no action should be taken against me or the 10th Congressional District Delegate Committee for Mondale. I saw nothing in the complaint enclosed with your correspondence that makes any specific charges against either the Committee nor myself, acting as Treasurer of said Committee.

All of the required reports have been filed, on time, in concurrence with F.E.C. regulations (including the termination report which you have not accepted). These reports properly reflect the activity of the Committee.

Therefore, in the absence of any specific charges against the Committee or myself as Treasurer, I do not intend to be represented by Counsel in this matter.

Very truly yours,

Steven Goldenkranz

Steven Goldenkranz
10th C.D. Delegates Committee
for Mondale
1551 East 23 Street
Brooklyn, New York 11210

8504050152

Steven Goldenkranz
10th C. D. Delegates Committee
for Mondale
1561 East 23 Street
Brooklyn, New York 11210



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

RETURN RECEIPT REQUESTED

CERTIFIED

P 631 654 333

MAIL

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Steven D. Goldenkranz
10th CD Delegates for Mondale
1551 East 23rd Street
Brooklyn, New York 11210

Re: MUR 1667

Dear Mr. Goldenkranz:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

8504050154

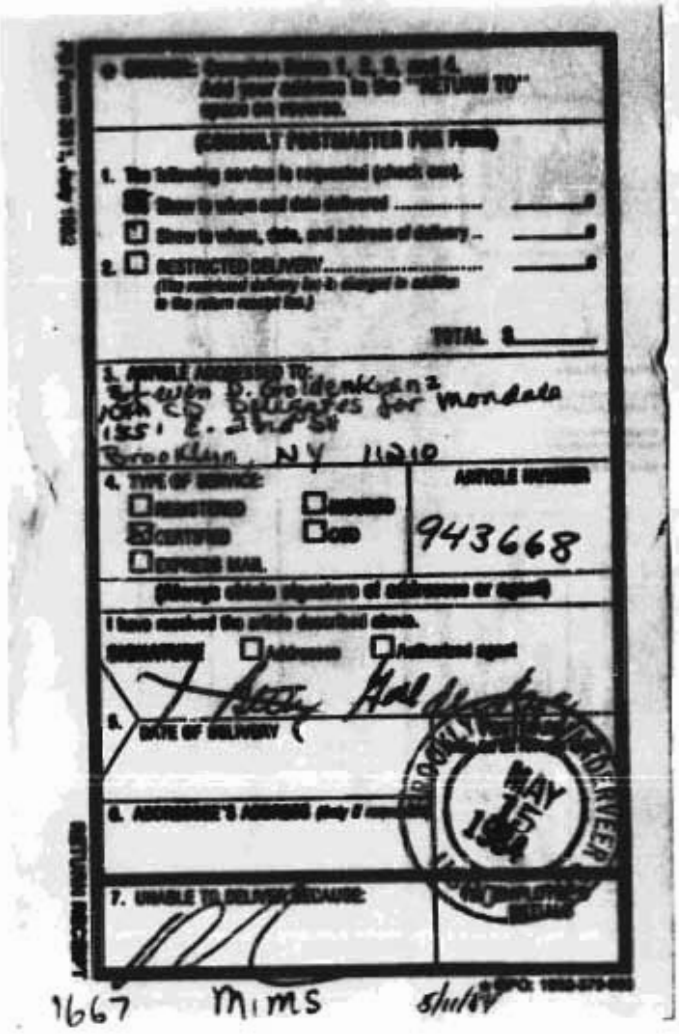
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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



8504050155

RECEIVED AT THE FEC
84 JUN 7 AM 11:37

STATEMENT OF DESIGNATION OF COUNSEL

GC#3570

MUR 1704

NAME OF COUNSEL: ELLEN S. ORAN

ADDRESS: ONE CHASE PLAZA
57 FLOOR
NY, NY

TELEPHONE:

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.

6/4/84
Date

Gerard J Sweeney
Signature

RESPONDENT'S NAME: Gerard J Sweeney

ADDRESS: 120-18 Queens Blvd
Kew Gardens, NY 11415

HOME PHONE:

BUSINESS PHONE: (212) 793-2900

8504050156

I, PENNISI & DOWD
TORNEYS AT LAW
QUEENS BOULEVARD
DENS, NEW YORK 11415

JAMAICA, NY 11
PM
5 JUN
1984

84 JUN 7 AM 7:27

Federal Election Commission
Washington DC 20463

11540

N4 9th

RECEIVED AT THE FEC
GCC#3400
84 MAY 1 A8:48

ONE CHASE MANHATTAN PLAZA
NEW YORK, N. Y. 10005

May 25, 1984

MUR 1667

MUR 1667
Memo

Dear Mr. Noble:

I understand that you have transmitted copies of the complaint of Americans With Hart and the supplements thereto to Mr. Paul Gross, treasurer of the 6th C.D. Delegates for Mondale Committee; Ms. Charlotte Scheman, treasurer of the 7th C.D. Delegates for Mondale Committee; Mr. Benjamin Chevat, treasurer of the 8th C.D. Delegates for Mondale Committee; and Mr. Gerard Sweeney, treasurer of the 9th C.D. Delegates for Mondale Committee. Please be advised that Thomas D. Barr and I have agreed to represent these committees and their respective treasurers in this matter.

Although your letters state that the complaint and supplements allege that the committees and individuals mentioned above "may have violated certain sections of the Federal Election Campaign Act of 1971, as amended," neither the complaint nor any of the supplements make reference to these committees or to these individuals. While the materials do contain certain broad statements concerning delegate committees generally, there is no way for us to know which, if any, may be intended to refer to our clients. In these circumstances, we find it very difficult to comment on behalf of these committees and their treasurers.

Our clients wish to cooperate fully with the Commission and will be pleased to answer any specific questions you may wish to put to them in aid to an appropriate investigation. If you have any such questions or requests for materials, please get in touch with me.

Very truly yours,

Ellen S. Oran

Ellen S. Oran

Lawrence N. Noble, Esq.,
Deputy General Counsel,
Federal Election Commission,
1325 K Street, N.W.,
Washington, D.C. 20463

131A

8504050158

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Gerard J. Sweeney, Treasurer
9th C D Delegates For Mondale
120-10 Queens Blvd.
New Gardens, NY 11415

Re: MUR 1667

Dear Mr. Sweeney:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

8504050159

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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

8504050116O

NY 8th

RECEIVED AT THE FEC
GCC#3400
84 MAY 1 A8:48

ONE CHASE MANHATTAN PLAZA
NEW YORK, N. Y. 10005

May 25, 1984

MUR 1667

MUR 1667
Memo —

Dear Mr. Noble:

I understand that you have transmitted copies of the complaint of Americans With Hart and the supplements thereto to Mr. Paul Gross, treasurer of the 6th C.D. Delegates for Mondale Committee; Ms. Charlotte Scheman, treasurer of the 7th C.D. Delegates for Mondale Committee; Mr. Benjamin Chevat, treasurer of the 8th C.D. Delegates for Mondale Committee; and Mr. Gerard Sweeney, treasurer of the 9th C.D. Delegates for Mondale Committee. Please be advised that Thomas D. Barr and I have agreed to represent these committees and their respective treasurers in this matter.

Although your letters state that the complaint and supplements allege that the committees and individuals mentioned above "may have violated certain sections of the Federal Election Campaign Act of 1971, as amended," neither the complaint nor any of the supplements make reference to these committees or to these individuals. While the materials do contain certain broad statements concerning delegate committees generally, there is no way for us to know which, if any, may be intended to refer to our clients. In these circumstances, we find it very difficult to comment on behalf of these committees and their treasurers.

Our clients wish to cooperate fully with the Commission and will be pleased to answer any specific questions you may wish to put to them in aid to an appropriate investigation. If you have any such questions or requests for materials, please get in touch with me.

Very truly yours,

Ellen S. Oran

Ellen S. Oran

Lawrence N. Noble, Esq.,
Deputy General Counsel,
Federal Election Commission,
1325 K Street, N.W.,
Washington, D.C. 20463

131A

8504050161

FEDERAL ELECTION COMMISSION
WASHINGTON D C 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Benjamin Chevat, Treasurer
8th C D Delegates For Mondale
64-48 223rd Place
Bayside, NY 11364

Re: MUR 1667

Dear Mr. Chevat:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

8504050162

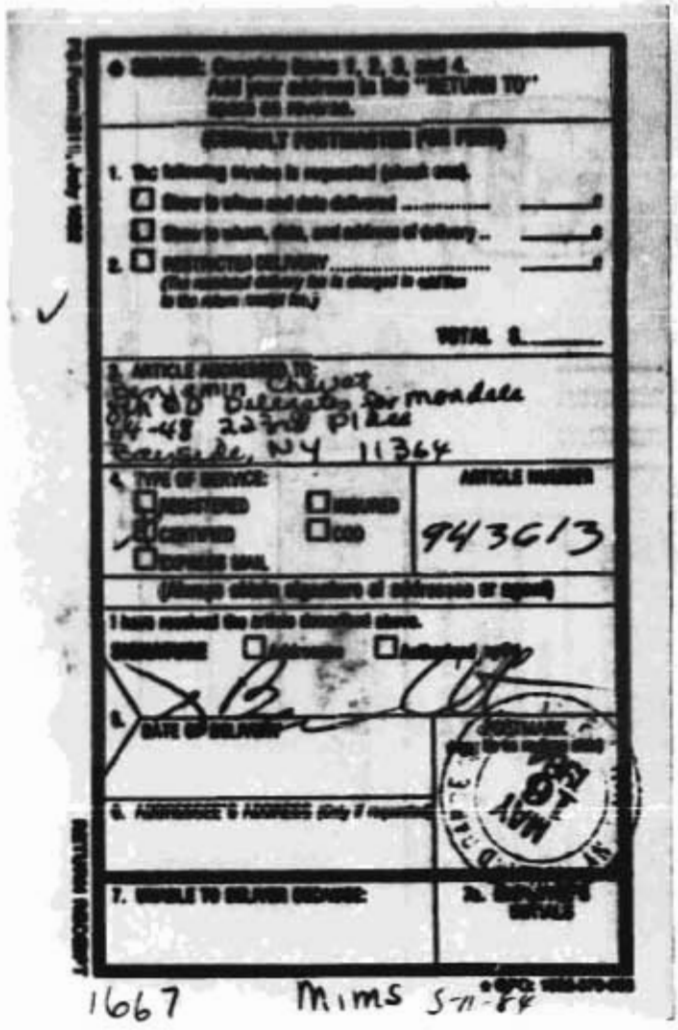
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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



8524050011163

8504005011164

WALTER H. OR PATRICIA TALLMADGE
34451 HARROUN 721-6884
WAYNE, MICH. 48184

3127

5-8 19 84

74-1260/724

PAY TO THE ORDER OF 15th District Delegates for Mondale $ 3.25

Three and 25/100 DOLLARS

MAIN OFFICE
WAYNE BANK
WAYNE, MICHIGAN 48184

Close acct. Patricia Tallmadge

⑆072412406⑆ 11-601688 2⑈ 3127

UNITED STATES OF AMERICA

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of the Complaint, as amended, of

AMERICANS WITH HART, INC.; M.U.R. No. 1667

15TH DISTRICT DELEGATES FOR MONDALE COMMITTEE, No. C00180380,

Respondent.

/

John D. Pirich (P-23204)
Kirk D. Messmer (P-34243)
Attorneys for Respondent

/

State of Michigan)
: ss
County of Wayne)

AFFIDAVIT

PATRICIA TALLMADGE, being first duly sworn, deposes and says:

1. I was Treasurer of the 15th District Delegates for Mondale Committee ("the Committee").

2. I formed the Committee in the week prior to the Michigan Democratic Party Caucuses held on March 17, 1984, in case it became necessary to receive any contribution or make any expenditure in order to influence the election of convention delegates committee to Mondale.

3. I opened the Committee's checking account with the Wayne Bank of Wayne, Michigan, on March 16, 1984.

MILLER, CANFIELD, PADDOCK AND STONE

8504050116 3

4. I registered the Committee with the Federal Election Commission on March 20, 1984.

5. The only contributions to the Committee were contributions made by me as follows:

a. March 16, $15.00 cash;

b. April 27, $7.23; and

c. May 8, $3.25 by my check no. 3127.

6. The total receipts of the Committee, amounting to $25.48, were consumed by checking account service fees, including check printing and endorsement stamp charges, as shown by the attached bank statements and documents.

7. The Committee never made any expenditure concerning any candidate or delegate, or contribution to any political committee.

8. I closed the Committee's checking account on May 8, 1984, and notified the Commission the next day.

9. The attached exhibits are true and correct copies of:

a. Statement of Organization filed with the F.E.C.;

b. Bank statement of March 30, 1984;

c. Bank statement of April 30, 1984;

d. Final bank statement of May 15, 1984;

e. Checking debit slip for endorsement stamp, $4.50, March 29, 1984;

f. Charge slip for printed documents, $14.50, April 3, 1984;

8504050116 6
MILLER, CANFIELD, PADDOCK AND STONE

g. Wayne Bank receipt for deposit of $7.23, April 27, 1984;

h. My check no. 3127 to the Committee for $3.25, May 8, 1984;

i. Wayne Bank receipt for deposit of $3.25, May 8, 1984.

Further Affiant saith not.

Patricia Tallmadge

Patricia Tallmadge

Subscribed and sworn to before
me this 29th day of May, 1984.

Notary Public, Wayne County
My Commission expires: WALTER H. TALLMADGE
Notary Public, Wayne County, Mich.
My Commission Expires June 16, 1985

MILLER CANFIELD PADDOCK AND STONE

8504050167

8504050168

WALTER H. OR PATRICIA TALLMADGE
34451 HARROUN 721-6684
WAYNE, MICH. 48184

3127

5-8 19 84

PAY TO THE ORDER OF 15th District delegates for Mondale $ 3.25

Three and 25/100 DOLLARS

MAIN OFFICE
WAYNE BANK
WAYNE, MICHIGAN 48184

Close acct. Patricia Tallmadge

:072412406: 11-601688 2 3127

8504050II69

DEPOSITED WITH YOUR BANK

WAYNE BANK
WAYNE, MICHIGAN

THE DEPOSIT FOR WHICH THIS RECEIPT IS ISSUED IS ACCEPTED SUBJECT TO THE CONDITIONS APPEARING ON THE SIGNATURE CARDS AND ON THE DEPOSIT TICKETS FURNISHED BY THIS BANK. THE DEPOSIT IS ACCEPTED SUBJECT ALSO TO VERIFICATION BY THE BANK'S PROOF DEPARTMENT OF THE ADDITION AND CORRECT LISTING OF ALL ITEMS CONTAINED THEREIN

Our Bank Symbol, Transaction Number, Date and Amount of Your Deposit as shown below:

THIS IS A RECEIPT FOR YOUR DEPOSIT — RETAIN IT
ALWAYS OBTAIN AN OFFICIAL RECEIPT WHEN MAKING A DEPOSIT

816105753# 115 WB 5/08/84#116 $3.25 D

WB 502

WAYNE BANK

(313) 721-4151

MICHIGAN SHELDON
(313) 39[illegible]50
FORD-HAGGERTY
(313) 981-5900

STATEMENT

15th District Delegates
For Mondale Committee
attn: Patricia Tallmadge
34451 Harroun
Wayne, MI 48184

PURGED
DATE 05-15-84
PAGE 1

ACCOUNT NO. 8-16105753 BUSINESS CHECKING ACCOUNT

PREVIOUS BALANCE	04-30-84	3.2500
1 DEPOSITS AND CREDITS .		3.25
0 CHECKS AND DEBITS . . .		.00
CURRENT BALANCE		.00

- - DAILY BALANCE SUMMARY - -

DATE	BALANCE	DATE	BALANCE
05-08	.00		

- - MISCELLANEOUS DEBITS AND CREDITS - -

DATE	AMOUNT	DESCRIPTION
05-08	3.25 CR	DEPOSIT

8504050117 0

NOTICE: SEE REVERSE SIDE AND ACCOMPANYING STATEMENT(S) FOR IMPORTANT INFORMATION.

" MEMBER F.D.I.C."

8504050117

DEPOSITED WITH
YOUR BANK

WAYNE BANK
WAYNE, MICHIGAN

THE DEPOSIT FOR WHICH THIS RECEIPT IS ISSUED IS ACCEPTED SUBJECT TO THE CONDITIONS APPEARING ON THE SIGNATURE CARDS AND ON THE DEPOSIT TICKETS FURNISHED BY THIS BANK. THE DEPOSIT IS ACCEPTED SUBJECT ALSO TO VERIFICATION BY THE BANK'S PROOF DEPARTMENT OF THE ADDITION AND CORRECT LISTING OF ALL ITEMS CONTAINED THEREIN.

Our Bank Symbol, Transaction Number, Date and Amount of Your Deposit as shown below:

THIS IS A RECEIPT FOR YOUR DEPOSIT — RETAIN IT
ALWAYS OBTAIN AN OFFICIAL RECEIPT WHEN MAKING A DEPOSIT

816105753# 113 WB 4/27/84#048 $7.23 D

WB 502

WAYNE BANK

(313) 721-4151

MICHIGAN SHELDON
(313) 397-[illegible]50
FORD-HAGGERTY
(313) 981-5900

STATEMENT

15th District Delegates
For Mondale Committe
34451 Harroun
Wayne, Mi. 48184

DATE 04-30-84
PAGE 1

1

ACCOUNT NO. 8-16105753 BUSINESS CHECKING ACCOUNT

PREVIOUS BALANCE	03-30-84	7.27
1 DEPOSITS AND CREDITS .		7.23
2 CHECKS AND DEBITS . . .		17.75
CURRENT BALANCE		3.25OD

- - DAILY BALANCE SUMMARY - -

DATE	BALANCE	DATE	BALANCE
04-03	7.23OD	04-30	3.25OD
04-27	.00		

- - MISCELLANEOUS DEBITS AND CREDITS - -

DATE	AMOUNT	DESCRIPTION
04-03	14.50 DR	DEBIT MEMO
04-27	7.23 CR	DEPOSIT
04-30	3.25 DR	SERVICE CHARGE

8504050172

NOTICE: SEE REVERSE SIDE AND ACCOMPANYING STATEMENT(S) FOR IMPORTANT INFORMATION.

" MEMBER F.D.I.C."

8504050II73

WAYNE BANK

CHECKING MISCELLANEOUS DEBIT

Tran Code	Account Number	Amount	Date	Org	Tran
12	8116057533	450			

12 Miscellaneous Debit	Approved By	Date 3-29-04	DEPOSIT TOTAL $	AMOUNT CHARGED $ 450
	DEPOSIT DATE	CHECK FOR $	WAS LISTED FOR ☐ $	WAS LISTED BUT NOT ENCLOSED ☐
	ERROR IN ADDITION OF $	CHECK WRITTEN BY		

NAME & ADDRESS

[illegible] Lenora Jaynes
[illegible] Tinnacle

BANK DRAWN ON

YOUR ENDORSER

OTHER Overdraft Charge

:555:-0020: 8161057533 012 "0000000450."

WAYNE BANK

(313) 721-4151

MICHIGAN SHELDON
(313) 39[illegible]50
FORD-HAGGERTY
(313) 981-5900

STATEMENT

15TH DISTRICT DELEGATES FOR MONDALE COMMITTEE
34431 HARROUN
WAYNE, MICH 48184

DATE 03-30-84
PAGE 1

FREE SAFE DEPOSIT RENTAL WITH AN IRA DEPOSIT EXPIRES ON APRIL 16TH SEE YOUR BRANCH FOR DETAILS

1

ACCOUNT NO. 8-16105753 BUSINESS CHECKING ACCOUNT

PREVIOUS BALANCE	03-15-84	.00
1 DEPOSITS AND CREDITS .		15.00
2 CHECKS AND DEBITS . . .		7.73
CURRENT BALANCE		7.27

- - DAILY BALANCE SUMMARY - -

DATE	BALANCE	DATE	BALANCE
03-16	15.00	03-30	7.27
03-29	10.50		

- - MISCELLANEOUS DEBITS AND CREDITS - -

DATE	AMOUNT	DESCRIPTION
03-16	15.00 CR	DEPOSIT (Cash)
03-29	4.50 DR	DEBIT MEMO
03-30	3.23 DR	SERVICE CHARGE

NOTICE: SEE REVERSE SIDE AND ACCOMPANYING STATEMENT(S) FOR IMPORTANT INFORMATION.

"MEMBER F.D.I.C."

8504050117 4

CHARGE FOR PRINTED DOCUMENTS

15TH DISTRICT DELEGATES FOR MONDALE COMMITTEE

1309

74-1240
724
300
RJ-3

ALL RECORDS CONCERNING THIS ORDER ARE FILED UNDER INDIVIDUAL ACCOUNT NUMBER BY DATE OF ORDER
IN ACCORDANCE WITH YOUR AUTHORIZATION, THE COST OF YOUR PERSONALIZED DOCUMENTS, PLUS DELIVERY AND SALES TAX
IF APPLICABLE, HAS BEEN DEDUCTED FROM YOUR ACCOUNT. PLEASE DEDUCT THE AMOUNT SHOWN BELOW FROM YOUR BALANCE

☐ PREM ☐ DIST ☑ W/C

MAIN OFFICE
WAYNE BANK
WAYNE, MICHIGAN 48184

14.50

⑆072462406⑆ 81-6105753⑈ 012/000000 14.50/

PLEASE DEDUCT FROM YOUR BALANCE

A 73 M4 82

RECEIVED AT THE FEC
GCC#3400
84 MAY 1 A8:48

ONE CHASE MANHATTAN PLAZA
NEW YORK, N. Y. 10005

May 25, 1984

MUR 1667

MUR 1667
Memo

Dear Mr. Noble:

I understand that you have transmitted copies of the complaint of Americans With Hart and the supplements thereto to Mr. Paul Gross, treasurer of the 6th C.D. Delegates for Mondale Committee; Ms. Charlotte Scheman, treasurer of the 7th C.D. Delegates for Mondale Committee; Mr. Benjamin Chevat, treasurer of the 8th C.D. Delegates for Mondale Committee; and Mr. Gerard Sweeney, treasurer of the 9th C.D. Delegates for Mondale Committee. Please be advised that Thomas D. Barr and I have agreed to represent these committees and their respective treasurers in this matter.

Although your letters state that the complaint and supplements allege that the committees and individuals mentioned above "may have violated certain sections of the Federal Election Campaign Act of 1971, as amended," neither the complaint nor any of the supplements make reference to these committees or to these individuals. While the materials do contain certain broad statements concerning delegate committees generally, there is no way for us to know which, if any, may be intended to refer to our clients. In these circumstances, we find it very difficult to comment on behalf of these committees and their treasurers.

Our clients wish to cooperate fully with the Commission and will be pleased to answer any specific questions you may wish to put to them in aid to an appropriate investigation. If you have any such questions or requests for materials, please get in touch with me.

Very truly yours,

Ellen S. Oran

Ellen S. Oran

Lawrence N. Noble, Esq.,
Deputy General Counsel,
Federal Election Commission,
1325 K Street, N.W.,
Washington, D.C. 20463

131A

8504050175

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Charlotte K. Scheman, Treasurer
7th C D Delegates For Mondale
143-53 Hoover Avenue
Briarwood, NY 11435

Re: MUR 1667

Dear Ms. Scheman:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

8504050175

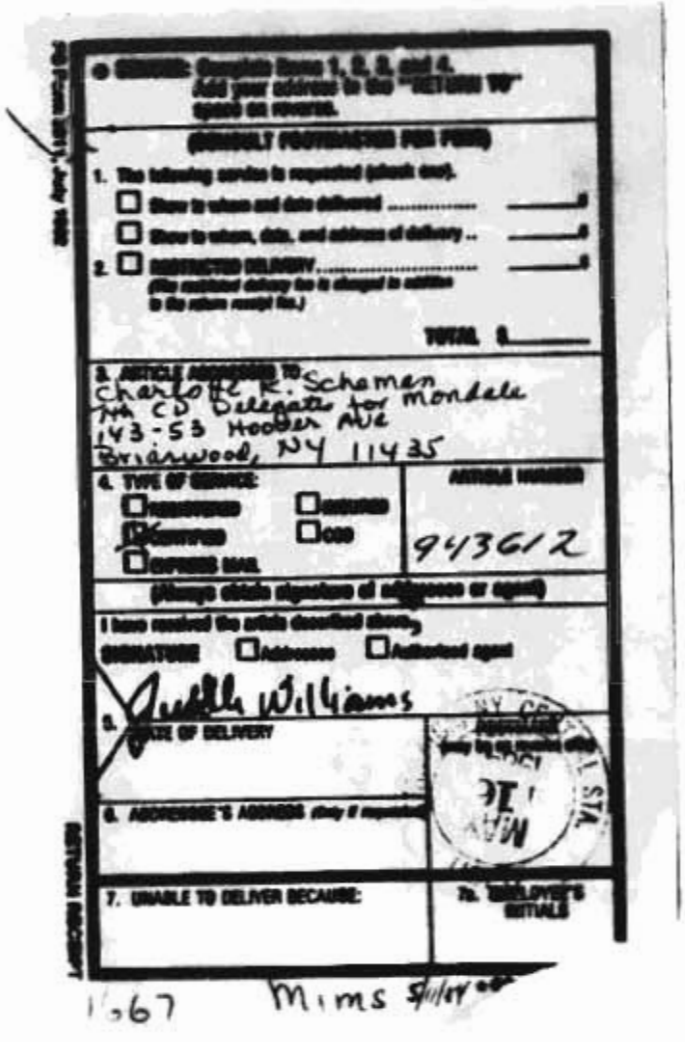
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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



RECEIVED AT THE FEC
84 MAY 1 A8:48

GCC#3400

ONE CHASE MANHATTAN PLAZA
NEW YORK, N. Y. 10005

May 25, 1984

MUR 1667

MUR 1667
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Very truly yours,

Ellen S. Oran

Ellen S. Oran

Lawrence N. Noble, Esq.,
Deputy General Counsel,
Federal Election Commission,
1325 K Street, N.W.,
Washington, D.C. 20463

131A

8504050178

5504 117

RECEIVED AT THE FEC

84 MAY 1 A8:48

Lawrence N. Noble, Esq.,
Deputy General Counsel,
Federal Election Commission,
1325 K Street, N.W.,
Washington, D.C. 20463

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Paul Gross, Treasurer
6th C D Delegates For
Mondale
92-03 Rockaway Beach Blvd
Rockaway Beach, NY 11693

Re: MUR 1667

Dear Mr. Gross:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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If you intend to be represented by counsel in this matter please advise the Commission by 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.

8504050180

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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

8594050118!

PS Form 3811, July 1983

(CONSULT POSTMASTER FOR FEES)

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
Paul Gross
4th CD Delegate for Mondale
92-03 Rockaway Bch Blvd
Rockaway Beach, NY 11692

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☑ CERTIFIED ☐ COD
☐ EXPRESS MAIL

ARTICLE NUMBER
943611

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY

POSTMARK

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

8. EMPLOYEE'S INITIALS

RETURN RECEIPT

1667 Mims

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Craig Heller, Treasurer
Long Island Mondale 4th
C D Committee
2919 Bond Drive
Merrick, NY 11566

Re: MUR 1667

Dear Mr. Heller:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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8504011820

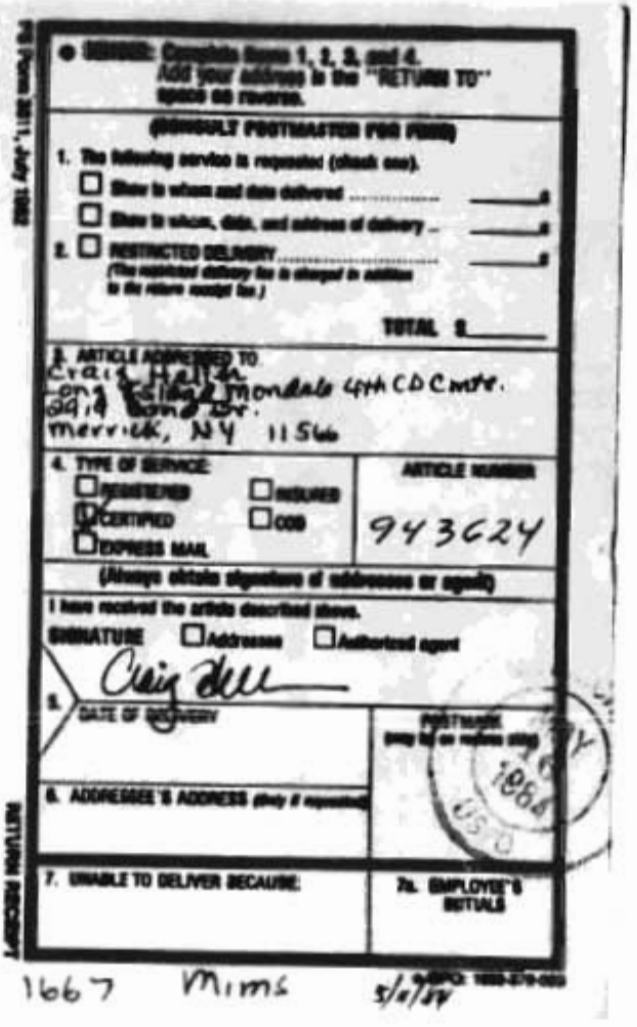
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Barry M. McCoy, Treasurer
Long Island Mondale
First CD Delegates
49 Thompson Hay Path
Setauket, NY 11733

Re: MUR 1667

Dear Mr. McCoy:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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8504011 84

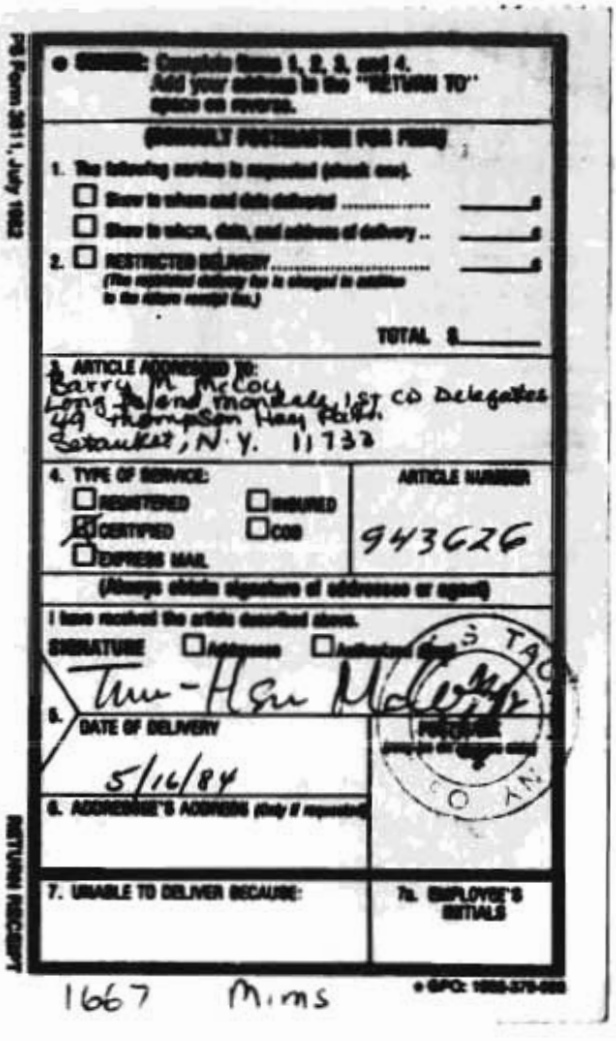
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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



8504050185

RECEIVED FEC
Gen # 3327
84 MAY 29 A9:05

WADLEIGH, STARR, PETERS, DUNN & CHIESA

WINTHROP WADLEIGH
WILLIAM J. STARR
PHILIP G. PETERS
CHARLES J. DUNN
THEODORE WADLEIGH
ROBERT L. CHIESA
ALAN HALL
WILLIAM C. TUCKER
EUGENE M. VAN LOAN III

95 MARKET STREET
MANCHESTER, NEW HAMPSHIRE 03101
TELEPHONE (603) 669-4140
TELECOPY (603) 669-4145

JOHN E. FRIBERG
JAMES C. WHEAT
WILLIAM S. GANNON
JOHN A. LASSEY
RONALD J. LAJOIE
KATHLEEN N. SULLIVAN
KATHERINE M. HANNA
JEFFREY H. KARLIN

Mur 1667
Mims

May 24, 1984

Mr. Steven Mims
Federal Election Commission
1325 K Street, NW
Washington, DC 20463

Re: MUR1667

Dear Mr. Mims:

Enclosed please find two statements of designation of counsel authorizing me to act as counsel for both the 1st District Delegates for Mondale and the 2nd District Delegates for Mondale.

I would also like to reaffirm my request for an extension for filing of our response in this matter.

If you have any questions in regard to this matter, please feel free to contact me.

Very truly yours,

Kathleen N. Sullivan

KNS/jbr

Enclosures

8504050187

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1667

NAME OF COUNSEL: Kathleen N. Sullivan

ADDRESS: Wadleigh, Starr, Peters, Dunn & Chiesa
95 Market Street
Manchester, NH 03101

TELEPHONE: (603) 669-4140

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.

5-22-84
Date

Nancy M. Regan
Signature

RESPONDENT'S NAME: NH 1st District Delegates for Mondale

ADDRESS: 5 Haines Drive
Merrimack, NH 03054

HOME PHONE:

BUSINESS PHONE: (603) 668-8010

8504051188

RECEIVED FEC
84 MAY 29 A8:05

WADLEIGH, STARR, PETERS, DUNN & CHIESA

WINTHROP WADLEIGH
WILLIAM J. STARR
PHILIP S. PETERS
CHARLES J. DUNN
THEODORE WADLEIGH
ROBERT L. CHIESA
ALAN HALL
WILLIAM C. TUCKER
EUGENE M. VAN LOAN III

95 MARKET STREET
MANCHESTER, NEW HAMPSHIRE 03101
TELEPHONE (603) 669-4140
TELECOPY (603) 669-4145

JOHN E. FRIBERG
JAMES G. WHEAT
WILLIAM S. GANNON

JOHN A. LABBET
RONALD J. LAJOIE
KATHLEEN N. SULLIVAN
KATHERINE M. HANNA
JEFFREY H. KARLIN

MUR 1667
Mims

May 24, 1984

Mr. Steven Mims
Federal Election Commission
1325 K Street, NW
Washington, DC 20463

Re: MUR1667

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Very truly yours,

Kathleen N. Sullivan

KNS/jbr

Enclosures

8504050189

RECEIVED AT THE FEC
GCC #3210
84 MAY 25 A8:51

WADLEIGH, STARR, PETERS, DUNN & CHIESA

WINTHROP WADLEIGH
WILLIAM J. STARR
PHILIP G. PETERS
CHARLES J. DUNN
THEODORE WADLEIGH
ROBERT L. CHIESA
ALAN HALL
WILLIAN C. TUCKER
EUGENE M. VAN LOAN III

95 MARKET STREET
MANCHESTER, NEW HAMPSHIRE 03101
TELEPHONE (603) 669-4140
TELECOPY (603) 669-4145

JOHN E. FRIBERG
JAMES C. WHEAT
WILLIAM S. GANNON
—
JOHN A. LASSEY
RONALD J. LAJOIE
KATHLEEN N. SULLIVAN
KATHERINE M. HANNA
JEFFREY H. KARLIN

May 22, 1984

Mims
MUR 1667

22 PM 10:23

Mr. Steven Mims
Federal Election Commission
1325 K Street, NW
Washington, DC 20463

Re: New Hampshire 2nd District Delegates for Mondale

Dear Mr. Mims:

I am writing in reference to the complaint against the New Hampshire 2nd District Delegates for Mondale concerning alleged violations of the Federal Election Campaign Act of 1971.

A response in this matter is required on or before May 24, 1984. I was unable to communicate with Mr. Tony Reddington, Treasurer of the 2nd District Delegates for Mondale, until May 21, 1984, concerning this matter. Consequently, I am writing to request that the Federal Election Commission provide the NH 2nd District Delegates for Mondale with a fifteen (15) day extension for submission of our response.

Thank you very much for your cooperation in this matter. Please feel free to call me if you have any questions regarding this matter.

Very truly yours,

Kathleen N. Sullivan

KNS/jbr

3504050192

IGH, STARR, PETERS, DUNN & CHIESA
95 MARKET STREET
MANCHESTER NEW HAMPSHIRE 03101

FEC

84 MAY 25 A8:51

Mr. Steven Mims
Federal Election Commission
1325 K Street, NW
Washington, DC 20463

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Diane M. Carr, Treasurer
L I - Mondale 2nd
Congressional District
P.O. Box 555
Lindenhurst, NY 11757

Re: MUR 1667

Dear Ms. Carr:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

8504050192

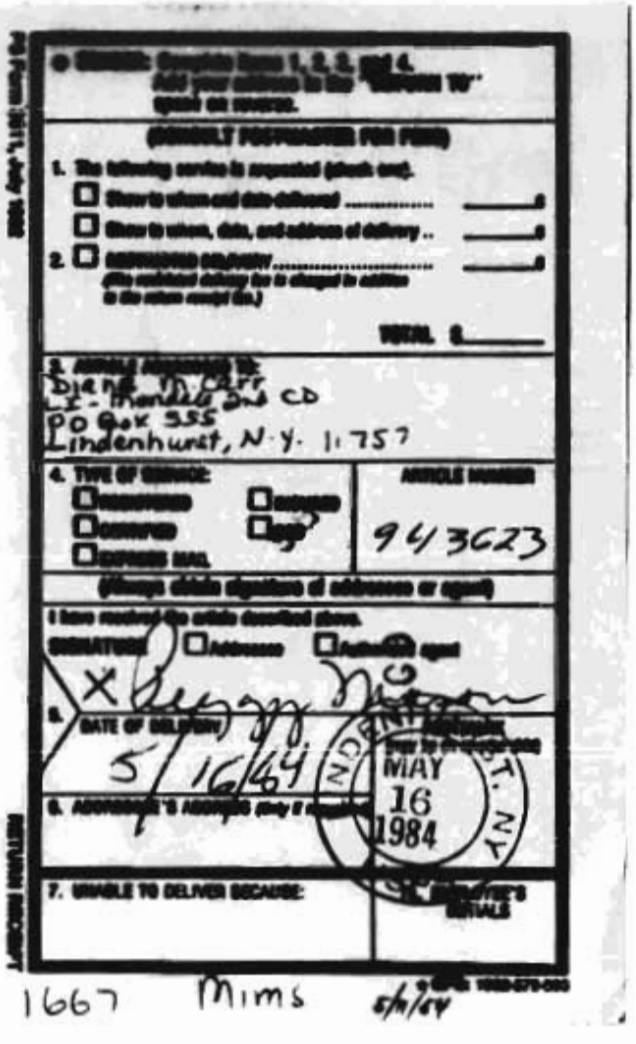
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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



3504050193

RECEIVED BY THE FEC
84 MAY 29 A9:05

Gen # 3327

WADLEIGH, STARR, PETERS, DUNN & CHIESA

WINTHROP WADLEIGH
WILLIAM J. STARR
PHILIP B. PETERS
CHARLES J. DUNN
THEODORE WADLEIGH
ROBERT L. CHIESA
ALAN HALL
WILLIAM C. TUCKER
EUGENE H. VAN LOAN III

95 MARKET STREET
MANCHESTER, NEW HAMPSHIRE 03101
TELEPHONE (603) 669-4140
TELECOPY (603) 669-4145

JOHN E. FRIBERG
JAMES C. WHEAT
WILLIAM S. GANNON
—
JOHN A. LASSEY
RONALD J. LAJOIE
KATHLEEN N. SULLIVAN
KATHERINE H. HANNA
JEFFREY H. KARLIN

Mur 1667
Mims

May 24, 1984

Mr. Steven Mims
Federal Election Commission
1325 K Street, NW
Washington, DC 20463

Re: MUR1667

Dear Mr. Mims:

Enclosed please find two statements of designation of counsel authorizing me to act as counsel for both the 1st District Delegates for Mondale and the 2nd District Delegates for Mondale.

I would also like to reaffirm my request for an extension for filing of our response in this matter.

If you have any questions in regard to this matter, please feel free to contact me.

Very truly yours,

Kathleen N. Sullivan

KNS/jbr

Enclosures

3504501194

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1667

NAME OF COUNSEL: Kathy Sullivan

ADDRESS: Wadleigh, Starr
95 Market St.
Manchester, N.H. 03101

TELEPHONE:

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.

5/20/84
Date

Signature

RESPONDENT'S NAME: Anthony L. Redington

2nd Dist Delegate for Mondale

ADDRESS: 4 Niel Drive
Allenstown, N.H. 03275

HOME PHONE: 603-485-8749

BUSINESS PHONE: 603-228-0571

8504011695

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1667

NAME OF COUNSEL: Kathleen N. Sullivan

ADDRESS: Wadleigh, Starr, Peters, Dunn & Chiesa
95 Market Street
Manchester, NH 03101

TELEPHONE: (603) 669-4140

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.

5-22-84
Date

Nancy M. Regan
Signature

RESPONDENT'S NAME: NH 1st District Delegates for Mondale

ADDRESS: 5 Haines Drive
Merrimack, NH 03054

HOME PHONE:

BUSINESS PHONE: (603) 668-8010

8504050196

IGH, STARR, PETERS, DUNN & CHIESA
95 MARKET STREET
NCHESTER, NEW HAMPSHIRE 03101

MANCHESTER, NH
PM
24 MAY
1984

Mr. Steven Mims
Federal Election Commission
1325 K Street, NW
Washington, DC 20463

15043

RECEIVED BY THE FEC
84 MAY 29 A9:05

Gen # 3327

1st Dest

WADLEIGH, STARR, PETERS, DUNN & CHIESA

WINTHROP WADLEIGH
WILLIAM J. STARR
PHILIP S. PETERS
CHARLES J. DUNN
THEODORE WADLEIGH
ROBERT L. CHIESA
ALAN HALL
WILLIAM C. TUCKER
EUGENE H. VAN LOAN III

95 MARKET STREET
MANCHESTER, NEW HAMPSHIRE 03101
TELEPHONE (603) 669-4140
TELECOPY (603) 669-4145

JOHN E. FRIBERG
JAMES G. WHEAT
WILLIAM D. GANNON
JOHN A. LASSEY
RONALD J. LAJOIE
KATHLEEN N. SULLIVAN
KATHERINE H. HANNA
JEFFREY H. HARLIN

MUR 1667
Mims

May 24, 1984

Mr. Steven Mims
Federal Election Commission
1325 K Street, NW
Washington, DC 20463

Re: MUR1667

Dear Mr. Mims:

Enclosed please find two statements of designation of counsel authorizing me to act as counsel for both the 1st District Delegates for Mondale and the 2nd District Delegates for Mondale.

I would also like to reaffirm my request for an extension for filing of our response in this matter.

If you have any questions in regard to this matter, please feel free to contact me.

Very truly yours,

Kathleen N. Sullivan

KNS/jbr

Enclosures

8504050198

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1667

NAME OF COUNSEL: Kathy Sullivan

ADDRESS: Wadleigh, Starr
95 Market St.
Manchester, N.H. 03101

TELEPHONE:

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.

5/20/84
Date

Signature

RESPONDENT'S NAME: Anthony L. Redington

ADDRESS: 4 Miel Drive
Allenstown, N.H. 03275

HOME PHONE: 603-485-8749

BUSINESS PHONE: 603-228-0571

8504050119

Gen Counsel
RECEIVED 3227
THE FEC
84 MAY 21 P12:28

WADLEIGH, STARR, PETERS, DUNN & CHIESA

WINTHROP WADLEIGH
WILLIAM J. STARR
PHILIP S. PETERS
CHARLES J. DUNN
THEODORE WADLEIGH
ROBERT L. CHIESA
ALAN HALL
WILLIAM C. TUCKER
EUGENE H. VAN LOAN III

95 MARKET STREET
MANCHESTER, NEW HAMPSHIRE 03101
TELEPHONE (603) 669-4140
TELECOPY (603) 669-4145

JOHN E. FRIBERG
JAMES G. WHEAT
WILLIAM S. GANNON
—
JOHN A. LASSEY
RONALD J. LAJOIE
KATHLEEN N. SULLIVAN
KATHERINE H. HANNA
JEFFREY H. KARLIN

MUR 1667
Mims

May 17, 1984

Mr. Steven Mims
Federal Election Commission
1325 K Street, NW
Washington, DC 20463

Re: MUR1667

Dear Mr. Mims:

I am writing in reference to your letter of May 4, 1984, to Nancy Ryan, Treasurer, New Hampshire 1st District Delegates for Mondale. This letter notified Ms. Ryan that the Federal Election Commission had received a complaint against NH 1st District Delegates for Mondale concerning alleged violations of the Federal Election Campaign Act of 1971. In your letter, you stated that a response must be submitted within fifteen (15) days of her receipt of your letter.

Ms. Ryan received your letter on May 9, 1984. Consequently, a response would be required on or before May 24, 1984. I am hereby requesting a fifteen (15) day extension for submission of our response. I did not receive the package from Ms. Ryan until May 14, and due to other pressing business and also a personal family emergency will be unable to submit a detailed response to your letter by May 24, 1984. Given the seriousness of the allegations, and the possible political ramifications, an extension is necessary for me to provide your office with an indepth response.

Thank you very much for your cooperation in this matter. Please feel free to call me if you have any questions concerning this request.

Very truly yours,

Kathleen N. Sullivan

KNS/jbr

3504012300

LEIGH, STARR, PETERS, DUNN & CHIESA
95 MARKET STREET
MANCHESTER, NEW HAMPSHIRE 03101

MANCHESTER, NH
1 PM
15 MAY
84 MAY 21 P12:28

Mr. Steven Mims
Federal Election Commission
1325 K Street, NW
Washington, DC 20463

12 0 4 5 0

RECEIVED AT THE FEC
84 JUN 19 AM : 54

G.C.#3685

McKITTRICK LAW FIRM

D. PATRICK McKITTRICK
TIMOTHY J. McKITTRICK

STRAIN BUILDING
SUITE 622
410 CENTRAL AVENUE
P. O. BOX 1184
GREAT FALLS, MONTANA 59403
TELEPHONE (406) 727-4041

June 14, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Federal Election Commission
1325 K Street N. W.
Washington, D. C. 20643

Re: MUR 1704

Gentlemen:

Enclosed please find the Response of the Montana At Large Delegates For Mondale Committee and Blake J. Wordal, Its Treasurer, relative to the above-captioned matter.

Thank you.

Sincerely,

D. PATRICK McKITTRICK

DPM:ac
Enclosure
cc: Mr. Blake J. Wordal w/enclosure
846 East 6th Avenue
Helena, Montana 59601

3504050202

RECEIVED AT THE F
84 JUN 19 AM : 5
19 PM 12:25

BEFORE THE

FEDERAL ELECTION COMMISSION

THE NATIONAL RIGHT TO WORK COMMITTEE and RALPH MARTIN (BUD) HETTINGA, JR., Complainants, v. WALTER F. MONDALE AND MONDALE FOR PRESIDENT CAMPAIGN COMMITTEE, AFL-CIO COPE POLITICAL CONTRIBUTION COMMITTEE, AFSCME PUBLIC EMPLOYEES ORGANIZED TO PROMOTE LEGISLATIVE EQUALITY QUALIFIED, AMERICAN FEDERATION OF TEACHERS COPE, UNITED FOOD AND COMMERCIAL WORKERS ACTIVE BALLOT CLUB, INTERNATIONAL UNION OF BRICKLAYERS AND ALLIED CRAFTSMEN PAC, CARPENTERS LEGISLATIVE IMPROVEMENT COMMITTEE, IRONWORKERS POLITICAL ACTION LEAGUE, MACHINISTS NON-PARTISAN POLITICAL LEAGUE, AMALGAMATED CLOTHING AND TEXTILE WORKERS UNION PAC, CWA-COPE PCC, SERVICE EMPLOYEES INTERNATIONAL UNION COPE PCC, UAW V CAP, and UNITED MINE WORKERS OF AMERICA COAL MINERS PAC, Respondents.	MUR 1704

3504050120 3

3504050120 4

RESPONSE

COME NOW THE MONTANA AT LARGE DELEGATES FOR MONDALE COMMITTEE and BLAKE J. WORDAL, Its Treasurer, by and through their attorney, and file this Response relative to the above-captioned matter.

THE MONTANA AT LARGE DELEGATES FOR MONDALE and MR. WORDAL are not named as parties in the Complaint. Relief is not requested against them either.

The only reference to THE MONTANA AT LARGE DELEGATES FOR MONDALE COMMITTEE is found on Page 11 of the Complaint where the amount of $1000 was donated to this Committee on March 21, 1984 by the American Federation of Teachers Cope. (Actually, as reported by the Committee to the FEC, the donation was received on March 26, 1984.)

Subsequently and after the Montana Democratic Caucus, the Committee made a partial refund of the contribution in the amount of $698.40 on May 7, 1984 to the American Federation of Teachers Cope. See Report to FEC dated May 7, 1984. This fact was not mentioned in the Complaint.

The Complaint fails to state a claim against the undersigned upon which relief can be granted. Specifically, pursuant to 11 C.F.R. Section 111.4, a formal Complaint should clearly identify as a respondent each person or entity who is alleged to have committed a violation.

Pursuant to 11 C.R.R. Section 111.4 a formal complaint should contain a clear and concise recitation of the facts describing the violation of a statute or law over which the Commission has jurisdiction.

Pursuant to 11 C.F.R. Section 111.4, the formal complaint should be accompanied by supporting documentation.

None of the above referred to requirements have been complied with by the Complainants as they pertain to the undersigned.

Accordingly, the Complainants have not made allegations against THE MONTANA

AT LARGE DELEGATES FOR MONDALE COMMITTEE or MR. MORDAL. Neither is named in the Complaint. We submit that there is nothing on record for the Commission to believe that a violation of law has occurred.

DATED this 14th day of June, 1984.

D. PATRICK McKITTRICK
McKITTRICK LAW FIRM
Suite 622, Strain Building
410 Central Avenue
P. O. Box 1184
Great Falls, Montana 59403
Telephone: (406) 727-4041

Attorney for THE MONTANA AT LARGE DELEGATES FOR MONDALE COMMITTEE

9504050012 05

TRICK LAW FIRM
BUILDING
ND
NTRAL AVENUE
OX 1184
FALLS, MONTANA 59403



CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Federal Election Commission
1325 K Street N. W.
Washington, D. C. 20643

CERTIFIED
P 201 049 321
MAIL

RECEIVED AT THE FEC
CCC# 3368
84 MAY 30 AM 11:34

McKITTRICK LAW FIRM

D. PATRICK McKITTRICK
TIMOTHY J. McKITTRICK

STRAIN BUILDING
SUITE 622
410 CENTRAL AVENUE
P. O. BOX 1184
GREAT FALLS, MONTANA 59403
TELEPHONE (406) 727-4041

May 24, 1984

MUR 1667
Memo

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Federal Election Commission
1325 K Street N. W.
Washington, D. C. 20643

Re: In the Matter of the Complaint of Americans With Hart, Inc., Complainant, against Mondale For President Committee, Inc., Respondent; MUR 1667

Gentlemen:

Enclosed please find the Response of the Montana At Large Delegates For Mondale Committee and Blake J. Wordal, Its Treasurer, relative to the above-captioned matter.

Thank you.

Sincerely,

D. PATRICK McKITTRICK

DPM:ac
Enclosure
cc: Mr. Blake J. Wordal
846 East 6th Avenue
Helena, Montana 59601

3504050207

RECEIVED AT THE FEC

84 MAY 30 AM 11:04

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of the Complaint of
Americans With Hart, Inc.,
Complainant,
-against-
Mondale for President Committee, Inc.,
Respondent.

MUR 1667

84 MAY 30 AM 11:15

RESPONSE

COME NOW the Montana At Large Delegates For Mondale Committee, and Blake J. Wordal, its Treasurer, by and through their attorney and file this Response relative to the above-captioned matter.

Americans With Hart, Inc. filed a Complaint against Mondale For President Committee, Inc. before the Federal Election Commission, dated April 6, 1984. Subsequently, the Complainant sent letters to the Federal Election Commission dated April 18, 1984, April 27, 1984, and May 2, 1984. By letter to Blake Wordal, Treasurer, Montanans At Large Delegates For Mondale Committe, Charles N. Steele, General Counsel, Federal Election Commission, informed Mr. Wordal that said Complaint "alleges that the Committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971 as amended ("the Act")".

Relief requested is apparently sought against Mondale For President, Inc., the Respondent. Neither the Montana At Large Delegates For Mondale Committee or Mr. Wordal, its Treasurer, are named as parties in the Complaint. Neither are specifically referred to in any of the allegations contained in the Complaint. Under these circumstances,

9504050208

the Complaint fails to state a claim upon which relief can be granted against either Montana At Large Delegates For Mondale Committe or Mr. Wordal.

The only reference in the voluminous amount of paper sent to the Federal Election Commission by Americans With Hart, Inc. even remotely relating to Montana is found on page 6 of its letter to the FEC dated April 27, 1984. There, reference is as follows:

> "Another illustration of the "rolling forward" of funds is evidenced by the transfer from the Kentucky Mondale Committee to the Montana Mondale Committee following the Kentucky caucuses. After the Montana election was over, the Montana Committee then sent $300 to the North Dakota Delegates For Mondale Committee."

The above-referred to April 27, 1984 letter is described by General Counsel Steele in his May 4, 1984 letter to Mr. Wordal as a supplement. For sure, the April 27, 1984 document cannot be characterized by any stretch of the imagination as an Amendment to the Complaint on file whereby either the Montana At Large Delegates For Mondale Committee or Mr. Wordal are made Respondents in the Complaint. (Note also that the illustration refers to the "Montana Mondale Committee" not the "Montana At Large Delegates For Mondale Committee".)

The basic rudiments of due process are lacking in the documentation provided to us. Not only are the Montana At Large Delegates For Mondale Committee and Mr. Wordal not named in the Complaint, but we have not been intelligently informed by the Americans With Hart, Inc. what provisions of the Act serve as the basis of any alleged violation. Again, no allegations whatsoever against Montana At Large Delegates Committee or Mr. Wordal are contained in the Complaint.

The Montana At Large Delegates For Mondale Committee is not owned by any other Committee nor does any other Committee have a controlling

8504050209

interest in voting shares or securities in this Committee.

There are no provisions in the documents of the Montana At Large Delegates For Mondale Committee by which any other Committee has the authority, power, or ability to direct the Mondale Delegates At Large Committee.

No other Committee has the authority, power or ability to hire, appoint, discipline, discharge, demote, or remove, or otherwise influence the decision of the officers or members of the Montana At Large Delegates For Mondale Committee.

While the Montana At Large Delegates For Mondale Committee received a contribution of some monies from the Kentucky At Large Delegates For Mondale Committee and donated $300.00 to the North Dakota For Mondale Committee, this hardly suffices as an indicia of affiliation with either of those two committees, or a transfer of funds, or a transfer of a substantial portion of this Committee's funds within the meaning of the Act, or attendant regulations.

Pursuant to A.O. 1980-5, a delegate committee may accept contributions of up to $5,000 from any person. The Montana At Large Delegates For Mondale Commission, pursuant to law, has reported the contributions it received as well as reported its disbursements. Thus, pursuant to 11 C.F.R. Section 100.5(g)(2)(ii), there is no basis for any assertion, even if <u>properly alleged</u>, accusing the Montana At Large Delegates For Mondale Committee, or Mr. Wordal, of any wrongdoing.

Regulation 11 C.F.R. Section 111.2(b)(2) mandates that a complaint must set forth a "clear and concise statement of the acts which are alleged to constitute a violation". The Americans With Hart, Inc. has not complied with the spirit, intent, or the plain reading of

3504050210

that regulation. Under the circumstances and documents provided, we respectfully submit that Americans With Hart, Inc. has not made allegations against Montana at Large Delegates For Mondale Committee, or Mr. Wordal. Neither is named in the Complaint. We pray that there is nothing on record for the Commission to believe that a violation of the law has occurred.

DATED this 24th day of May, 1984.

D. Patrick McKittrick
McKittrick Law Firm
Suite 622 Strain Building
410 Central Avenue
P. O. Box 1184
Great Falls, Montana 59403
(406) 727-4041

Attorney for MONTANA AT LARGE
DELEGATES FOR MONDALE COMMITTEE
AND BLAKE J. WORDAL, ITS TREASURER

8504050211

TRICK LAW FIRM
BUILDING
22
NTRAL AVENUE
OX 1184
FALLS, MONTANA 59403



CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Federal Election Committee
1325 K Street N. W.
Washington, D. C. 20643



RECEIVED AT THE FEC
Ga# 3333
84 MAY 21 P1:

McKITTRICK LAW FIRM

D. PATRICK McKITTRICK
TIMOTHY J. McKITTRICK

STRAIN BUILDING
SUITE 622
410 CENTRAL AVENUE
P. O. BOX 1184
GREAT FALLS, MONTANA 59403
TELEPHONE (406) 727-4041

May 15, 1984

Mur 1667
Memo

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Stephen Mims, Esq.
Attorney at Law
Federal Election Commission
1325 K Street N.W.
Washington, D.C. 20463

Re: MUR 1667

Dear Mr. Mims:

I am writing pursuant to our telephone call of May 15, 1984 relative to the above-captioned matter. I have been requested to represent the Montana At Large Delegates For Montana Committee by its Treasurer, Blake Wordal.

The purpose of this letter is to request an extension of time within which to file a response in connection with the matter. Mr. Wordal and I first visited about this case in a brief long distance telephone call on Saturday, May 12, 1984, during which conversation he indicated he would send me a copy of the materials and complaint sent to him by Charles N. Steele, General Counsel, under cover letter dated May 4, 1984. I received that material on Tuesday, May 15, 1984.

At the time you and I talked on May 15, 1984, I had not the opportunity to review the materials in its entirety or familiarize myself with the case. Also, within the next several weeks, I have several hearings scheduled and briefs in other cases due to be filed. Accordingly, I am respectfully requesting that I be given an additional fifteen (15) days time within which to file a response to the complaint. This will allow me the necessary time to review the documents, consult with my client, and prepare the said response as well as arrange my schedule relative to the matters in my office.

Thank you for your courtesies.

Sincerely,

D. PATRICK McKITTRICK

DPM:ac

3504050213

TRICK LAW FIRM
BUILDING
NTRAL AVENUE
OX 1184
FALLS, MONTANA 59403



CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Stephen Mims, Esq.
Attorney at Law
Federal Election Commission
1325 K Street N.W.
Washington, D.C. 20463

CERTIFIED
P 201 049 314
MAIL

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Marsha Murphy, Treasurer
Western Missouri Mondale
Delegates Committee
220 West Armour Boulevard
Kansas City, MO 64111

Re: MUR 1667

Dear Ms. Murphy:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

8504050215

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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

8504050216

MUR #1704

RECEIVED AT THE FEC

LAW OFFICES OF

MILLER, CANFIELD, PADDOCK AND STONE

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

SUITE 900
ONE MICHIGAN AVENUE
LANSING, MICHIGAN 48933

TELEPHONE (517) 487-2070
TELECOPIER (517) 483-4956

84 AUG 27 A8:08

SIDNEY T. MILLER (1864-1940)
GEORGE L. CANFIELD (1868-1929)
LEWIS H. PADDOCK (1868-1935)
FERRIS D. STONE (1882-1945)

DETROIT, MICHIGAN
BIRMINGHAM, MICHIGAN
BOCA RATON, FLORIDA
GRAND RAPIDS, MICHIGAN
MONROE, MICHIGAN
TRAVERSE CITY, MICHIGAN
WASHINGTON, D.C.

KIRK D. MESSMER
(517) 483-4808

RECEIVED
FEDERAL ELECTION COMMISSION
GENERAL COUNSEL
84 AUG 27 P1:20

August 23, 1984

Charles N. Steele, Esq.
General Counsel
Federal Election Commission
Washington, D.C. 20463

Re: MUR 1704
15th District Delegates for Mondale Committee (MI),
Id. No. C00180380

Dear Mr. Steele:

I have received your letter of August 16, stating that MUR 1667 has been folded into MUR 1704.

As the 15th District Delegates for Mondale Committee's responses in both MURs have demonstrated, the committee is not a "committee" within the meaning of the Federal Election Campaign Act and is not subject to the Federal Election Commission's administrative jurisdiction.

I request once again that the Commission make a finding of no violation by the 15th District Delegates for Mondale Committee in merged MUR 1704.

Thank you for your attention.

Very truly yours,

MILLER, CANFIELD, PADDOCK and STONE

By Kirk D. Messmer
Kirk D. Messmer

KDM:a
pc: Patricia Tallmadge

3504021217

LAW OFFICES OF
MILLER, CANFIELD, PADDOCK AND STONE
SUITE 900
ONE MICHIGAN AVENUE
LANSING, MICHIGAN 48933

RECEIVED AT THE FE
84 AUG 27 A 8:53

Charles N. Steel, Esq.
General Counsel
Federal Election Commission
Washington, D.C. 20463

MUR 1667

RECEIVED AT THE FEC
GCC#3474
84 JUN 4 AM 8:08

LAW OFFICES OF
MILLER, CANFIELD, PADDOCK AND STONE

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

SUITE 900
ONE MICHIGAN AVENUE
LANSING, MICHIGAN 48933

TELEPHONE (517) 487-2070
TELECOPIER (517) 483-4956

DETROIT, MICHIGAN
BIRMINGHAM, MICHIGAN
BOCA RATON, FLORIDA
GRAND RAPIDS, MICHIGAN
MONROE, MICHIGAN
TRAVERSE CITY, MICHIGAN
WASHINGTON, D.C.

May 31, 1984

John D. Gibson
Assistant Staff Director
Reports Analysis Division
Federal Election Commission
Washington, D.C. 20463

Re: 15th District Delegates For Mondale Committee

Dear Mr. Gibson:

I received today your letter of May 16 to Patricia Tallmadge, Treasurer of the 15th District Delegates for Mondale Committee, Id. No. C 00180380, in which you suggested that the Committee could not terminate its existence or its reporting requirements, while M.U.R. 1667 is pending.

Enclosed is the Committee's recent response filed in M.U.R. 1667. That response shows that the Committee never accepted sufficient contributions, nor made sufficient (or any) expenditures, to bring it within the Commission's regulatory jurisdiction, or to require the Committee to make any report or even to register with the Commission at all. It should, therefore, be apparent that M.U.R. 1667 does not preclude authorization of the Committee's termination; but in fact, the Committee has no need of the Commission's authorization.

Please do not hesitate to call me if you have any further questions.

Very truly yours,

MILLER, CANFIELD, PADDOCK and STONE

By Kirk D. Messmer
Kirk D. Messmer

KDM:c
Enclosure
pc w/o encl: John D. Pirich, Esq.
Patricia Tallmadge

3504012119

LAW OFFICES OF
MILLER, CANFIELD, PADDOCK AND STONE
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
SUITE 900
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Please do not hesitate to call me if you have any further questions.

Very truly yours,

MILLER, CANFIELD, PADDOCK and STONE

By Kirk D. Messmer
Kirk D. Messmer

KDM:c
Enclosure
pc w/o encl: John D. Pirich, Esq.
Patricia Tallmadge

3504050120

LAW OFFICES OF
MILLER, CANFIELD, PADDOCK AND STONE
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
SUITE 900
ONE MICHIGAN AVENUE
LANSING, MICHIGAN 48933
TELEPHONE (517) 487-2070
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BOCA RATON, FLORIDA
GRAND RAPIDS, MICHIGAN
MONROE, MICHIGAN
TRAVERSE CITY, MICHIGAN
WASHINGTON, D.C.

May 29, 1984

Charles N. Steele, Esq.,
General Counsel, and
Stephen Mims, Esq.,
Deputy General Counsel
Federal Election Commission
Washington, D.C. 20463

Re: Matter Under Review No. 1667
15th District Delegates for Mondale Committee,
F.E.C. Id. No. C00180380

Gentlemen:

This letter and supporting documents constitute the response of the 15th District Delegates for Mondale Committee, F.E.C. Id. No. C00180380 (the "Committee"), to the Commission's letter of May 11, 1984.

The enclosed Affidavit of Patricia Tallmadge, Treasurer of the Committee, and the bank statements and documents attached thereto, show that the Committee received only three contributions totalling $25.48 and made no expenditure or contribution to another committee. The three contributions of $15.00, $7.23, and $3.25 were all made by Ms. Tallmadge. The

3504050122

Committee's total receipts were consumed by checking account service charges.

The Federal Election Campaign Act defines a "political committee" as "any committee, club, association, or other group of persons which receives contributions aggregating in excess of $1,000 during a calendar year or which makes expenditures aggregating in excess of $1,000 during a calendar year," 2 U.S.C. § 431(4)(A); cf. 11 C.F.R. § 100.5(a). The 15th District Delegates for Mondale Committee never met either threshold criterion, and therefore never became a "political committee" subject to the Federal Election Campaign Act.

Because the 15th District Delegates for Mondale Committee never became a "political committee" subject to the Act:

1. The Committee never became a "delegate committee", which 11 C.F.R. § 100.5(e)(5) defines as a special case of a political committee;

2. The Committee is not required to file the reports prescribed by 2 U.S.C. § 434(a), (c); and

3. The affiliated political committee provisions of 2 U.S.C. § 441a(a)(5) do not apply to the Committee.

Ms. Tallmadge intends to count her $25.48 in contributions to the Committee against the $25,000 limit on total annual contributions.

Regardless of the merits the complaint filed by Americans With Hart, Inc., on April 6, 1984, as amended on April 18, April 27, and May 2, 1984, may have with respect to other delegate committees-- and the 15th District Delegates for Mondale

3504012222

Committee considers the complaint's construction of the Act and regulations to be clearly incorrect-- it has no application whatever to the brief life of the 15th District Delegates for Mondale Committee. The Committee therefore asks the Commission to find no reason to believe that the complaint sets forth a possible violation of the Act by the Committee or its Treasurer, and to close its file with respect to this matter and this Committee.

Please do not hesitate to call me or my associate Kirk Messmer if you have any questions or require further information.

Very truly yours,

MILLER, CANFIELD, PADDOCK and STONE

By _____
John D. Pirich

Enclosures
pc: Patricia Tallmadge
Kirk D. Messmer, Esq.

KDMD:053

3504050122 3

LAW OFFICES OF
CANFIELD, PADDOCK AND STONE
SUITE 900
ONE MICHIGAN AVENUE
LANSING, MICHIGAN 48933

850402012



John D. Gibson
Assistant Staff Director
Reports Analysis Division
Federal Election Commission
Washington, D.C. 20463

RECEIVED AT THE FEC
MCC # 3414
84 MAY 1 AM 10:35

LAW OFFICES OF
MILLER, CANFIELD, PADDOCK AND STONE
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
SUITE 900
ONE MICHIGAN AVENUE
LANSING, MICHIGAN 48933

TELEPHONE (517) 487-2070
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WASHINGTON, D.C.

May 29, 1984

Charles N. Steele, Esq.,
General Counsel, and
Stephen Mims, Esq.,
Deputy General Counsel
Federal Election Commission
Washington, D.C. 20463

Re: Matter Under Review No. 1667
15th District Delegates for Mondale Committee,
F.E.C. Id. No. C00180380

Gentlemen:

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Ms. Tallmadge intends to count her $25.48 in contributions to the Committee against the $25,000 limit on total annual contributions.

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3504026

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Please do not hesitate to call me or my associate Kirk Messmer if you have any questions or require further information.

Very truly yours,

MILLER, CANFIELD, PADDOCK and STONE

By _____
John D. Pirich

Enclosures
pc: Patricia Tallmadge
Kirk D. Messmer, Esq.

KDMD:053

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Very truly yours,

MILLER, CANFIELD, PADDOCK and STONE

By _____
John D. Pirich

Enclosures
pc: Patricia Tallmadge
Kirk D. Messmer, Esq.

KDMD:053

8504050122 7

UNITED STATES OF AMERICA

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of the Complaint, as amended, of

AMERICANS WITH HART, INC.; M.U.R. No. 1667

15TH DISTRICT DELEGATES FOR MONDALE COMMITTEE, No. C00180380,

Respondent.

/

John D. Pirich (P-23204)
Kirk D. Messmer (P-34243)
Attorneys for Respondent

/

State of Michigan)
: ss
County of Wayne)

AFFIDAVIT

PATRICIA TALLMADGE, being first duly sworn, deposes and says:

1. I was Treasurer of the 15th District Delegates for Mondale Committee ("the Committee").

2. I formed the Committee in the week prior to the Michigan Democratic Party Caucuses held on March 17, 1984, in case it became necessary to receive any contribution or make any expenditure in order to influence the election of convention delegates committee to Mondale.

3. I opened the Committee's checking account with the Wayne Bank of Wayne, Michigan, on March 16, 1984.

8504050I228
MILLER, CANFIELD, PADDOCK AND STONE

4. I registered the Committee with the Federal Election Commission on March 20, 1984.

5. The only contributions to the Committee were contributions made by me as follows:

a. March 16, $15.00 cash;

b. April 27, $7.23; and

c. May 8, $3.25 by my check no. 3127.

6. The total receipts of the Committee, amounting to $25.48, were consumed by checking account service fees, including check printing and endorsement stamp charges, as shown by the attached bank statements and documents.

7. The Committee never made any expenditure concerning any candidate or delegate, or contribution to any political committee.

8. I closed the Committee's checking account on May 8, 1984, and notified the Commission the next day.

9. The attached exhibits are true and correct copies of:

a. Statement of Organization filed with the F.E.C.;

b. Bank statement of March 30, 1984;

c. Bank statement of April 30, 1984;

d. Final bank statement of May 15, 1984;

e. Checking debit slip for endorsement stamp, $4.50, March 29, 1984;

f. Charge slip for printed documents, $14.50, April 3, 1984;

8504050I229

MILLER, CANFIELD, PADDOCK AND STONE

g. Wayne Bank receipt for deposit of $7.23, April 27, 1984;

h. My check no. 3127 to the Committee for $3.25, May 8, 1984;

i. Wayne Bank receipt for deposit of $3.25, May 8, 1984.

Further Affiant saith not.

Patricia Tallmadge

Patricia Tallmadge

Subscribed and sworn to before
me this 29th day of May, 1984.

Notary Public, Wayne County
My Commission expires:

WALTER H. TALLMADGE
Notary Public, Wayne County, Mich.
My Commission Expires June 15, 1986

MILLER, CANFIELD, PADDOCK AND STONE

84.05.1071

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Patricia Tallmadge

Patricia Tallmadge

Subscribed and sworn to before me this 29th day of May, 1984.

Notary Public, Wayne County
My Commission expires:

WALTER H. TALLMADGE
Notary Public, Wayne County, Mich.
My Commission Expires June 15, 1985

8504050I230

MILLER, CANFIELD, PADDOCK AND STONE

8504050I231

WALTER H. OR PATRICIA TALLMADGE
34451 HARROUN 721-6884
WAYNE, MICH. 48184

3127

5-8 19 84

PAY TO THE ORDER OF 15th District Delegates for Mondale $ 3.25 -

Three and 25/100 DOLLARS

MAIN OFFICE
WAYNE BANK
WAYNE, MICHIGAN 48184

Close acct.

Patricia Tallmadge

8504050I232

DEPOSITED WITH YOUR BANK

WAYNE BANK
WAYNE, MICHIGAN

THE DEPOSIT FOR WHICH THIS RECEIPT IS ISSUED IS ACCEPTED SUBJECT TO THE CONDITIONS APPEARING ON THE SIGNATURE CARDS AND ON THE DEPOSIT TICKETS FURNISHED BY THIS BANK. THE DEPOSIT IS ACCEPTED SUBJECT ALSO TO VERIFICATION BY THE BANK'S PROOF DEPARTMENT OF THE ADDITION AND CORRECT LISTING OF ALL ITEMS CONTAINED THEREIN.

Our Bank Symbol, Transaction Number, Date and Amount of Your Deposit as shown below:

THIS IS A RECEIPT FOR YOUR DEPOSIT — RETAIN IT
ALWAYS OBTAIN AN OFFICIAL RECEIPT WHEN MAKING A DEPOSIT

816105753# 115 WB 5/08/84#116 $3.25 D

WB XXI

WAYNE BANK
(313) 721-4151

MICHIGAN SHELDON
(313) 397-[illegible]60
FORD-HAGGERTY
(313) 981-6900

STATEMENT

15th District Delegates
For Mondale Committee
attn: Patricia Tallmadge
34451 Harroun
Wayne, MI 48184

PURGED
DATE 05-15-84
PAGE 1

ACCOUNT NO. 8-16105753 BUSINESS CHECKING ACCOUNT

PREVIOUS BALANCE	04-30-84	3.25OD
1 DEPOSITS AND CREDITS .		3.25
0 CHECKS AND DEBITS . . .		.00
CURRENT BALANCE		.00

- - DAILY BALANCE SUMMARY - -

DATE	BALANCE	DATE	BALANCE
05-08	.00		

- - MISCELLANEOUS DEBITS AND CREDITS - -

DATE	AMOUNT	DESCRIPTION
05-08	3.25 CR	DEPOSIT

8504050012333

NOTICE: SEE REVERSE SIDE AND ACCOMPANYING STATEMENT(S) FOR IMPORTANT INFORMATION.
" MEMBER F.D.I.C."

8504050I234

DEPOSITED WITH YOUR BANK

WAYNE BANK
WAYNE, MICHIGAN

THE DEPOSIT FOR WHICH THIS RECEIPT IS ISSUED IS ACCEPTED SUBJECT TO THE CONDITIONS APPEARING ON THE SIGNATURE CARDS AND ON THE DEPOSIT TICKETS FURNISHED BY THIS BANK THE DEPOSIT IS ACCEPTED SUBJECT ALSO TO VERIFICATION BY THE BANK'S PROOF DEPARTMENT OF THE ADDITION AND CORRECT LISTING OF ALL ITEMS CONTAINED THEREIN

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THIS IS A RECEIPT FOR YOUR DEPOSIT — RETAIN IT
ALWAYS OBTAIN AN OFFICIAL RECEIPT WHEN MAKING A DEPOSIT

816105753# 113 WB 4/27/84#048 $7.23 D

WB 502

8504050012 3 5

CHARGE FOR PRINTED DOCUMENTS

1309

15TH DISTRICT DELEGATES FOR MONDALE COMMITTEE

74-1240
724
300
RJ-3

ALL RECORDS CONCERNING THIS ORDER ARE FILED UNDER INDIVIDUAL ACCOUNT NUMBER BY DATE OF ORDER. IN ACCORDANCE WITH YOUR AUTHORIZATION, THE COST OF YOUR PERSONALIZED DOCUMENTS, PLUS DELIVERY AND SALES TAX IF APPLICABLE, HAS BEEN DEDUCTED FROM YOUR ACCOUNT. PLEASE DEDUCT THE AMOUNT SHOWN BELOW FROM YOUR BALANCE

☐ PREM ☐ DIST ☑ W/C

CHARGE

14.50

MAIN OFFICE
WAYNE BANK
WAYNE, MICHIGAN 48184

:072461240621: 81-6105753" 012'000000 14.50'

PLEASE DEDUCT FROM YOUR BALANCE

A-73 M14 821

WAYNE BANK

(313) 721-4151

MICHIGAN SHELDON
(313) 397-[illegible]50
FORD-HAGGERTY
(313) 981-5900

STATEMENT

15th District Delegates
For Mondale Committe
34451 Harroun
Wayne, Mi. 48184.00

DATE 04-30-84
PAGE 1

1

ACCOUNT NO. 8-16105753 BUSINESS CHECKING ACCOUNT

PREVIOUS BALANCE	03-30-84	7.27
1 DEPOSITS AND CREDITS .		7.23
2 CHECKS AND DEBITS . . .		17.75
CURRENT BALANCE		3.25OD

- - DAILY BALANCE SUMMARY - -

DATE	BALANCE	DATE	BALANCE
04-03	7.23OD	04-30	3.25OD
04-27	.00		

- - MISCELLANEOUS DEBITS AND CREDITS - -

DATE	AMOUNT	DESCRIPTION
04-03	14.50 DR	DEBIT MEMO
04-27	7.23 CR	DEPOSIT
04-30	3.25 DR	SERVICE CHARGE

8504050I236

NOTICE: SEE REVERSE SIDE AND ACCOMPANYING STATEMENT(S) FOR IMPORTANT INFORMATION.

" MEMBER F.D.I.C."

8504050I237

WAYNE BANK

CHECKING MISCELLANEOUS DEBIT

Tran Code	Account Number	Amount	Date	Org	Tran
12	81 10 5 7 5 3	4 5 0			

3 9 11 21 31 36

12 Miscellaneous Debit	Approved By	Date 3.29.94	DEPOSIT TOTAL $	AMOUNT CHARGED $ 4.50
	DEPOSIT DATE	CHECK FOR $	WAS LISTED FOR ☐ $	WAS LISTED BUT NOT ENCLOSED ☐
	ERROR IN ADDITION OF $	CHECK WRITTEN BY		

NAME & ADDRESS

13th District Delegates
190 Manhasset

BANK DRAWN ON

YOUR ENDORSER

OTHER Endorsement Stamp

⑆555⑈0020⑆ 816105753⑈ 012 ⑈0000000450⑈

WAYNE BANK

(313) 721-4151

MICHIGAN SHELDON
(313) 397-[illegible]50
FORD-HAGGERTY
(313) 981-5900

STATEMENT

15TH DISTRICT DELEGATES FOR MONDALE
COMMITTEE
34431 HARROUN
WAYNE, MICH 48184

DATE 03-30-84
PAGE 1

**FREE SAFE DEPOSIT RENTAL WITH
AN IRA DEPOSIT EXPIRES ON APRIL 16TH
SEE YOUR BRANCH FOR DETAILS**

1

ACCOUNT NO. 8-16105753 BUSINESS CHECKING ACCOUNT

PREVIOUS BALANCE	03-15-84	.00
1 DEPOSITS AND CREDITS .		15.00
2 CHECKS AND DEBITS . . .		7.73
CURRENT BALANCE		7.27

- - DAILY BALANCE SUMMARY - -

DATE	BALANCE	DATE	BALANCE
03-16	15.00	03-30	7.27
03-29	10.50		

- - MISCELLANEOUS DEBITS AND CREDITS - -

DATE	AMOUNT	DESCRIPTION
03-16	15.00 CR	DEPOSIT (Cash)
03-29	4.50 DR	DEBIT MEMO
03-30	3.23 DR	SERVICE CHARGE

8504050I238

NOTICE: SEE REVERSE SIDE AND ACCOMPANYING STATEMENT(S) FOR IMPORTANT INFORMATION.
" MEMBER F.D.I.C."



LAW OFFICES OF
MILLER, CANFIELD, PADDOCK AND STONE
SUITE 900
ONE MICHIGAN AVENUE
LANSING, MICHIGAN 48933

TO: Charles N. Steele, Esq.
General Counsel, and
Stephen Mims, Esq.,
Deputy General Counsel
Federal Election Commission
Washington, D.C. 20463

FIRST CLASS MAIL

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Patricia Tallmadge, Treasurer
15th District Delegates For
Mondale Committee
34451 Harroun
Wayne, MI 48184

Re: MUR 1667

Dear Ms. Tallmadge:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

8504050240

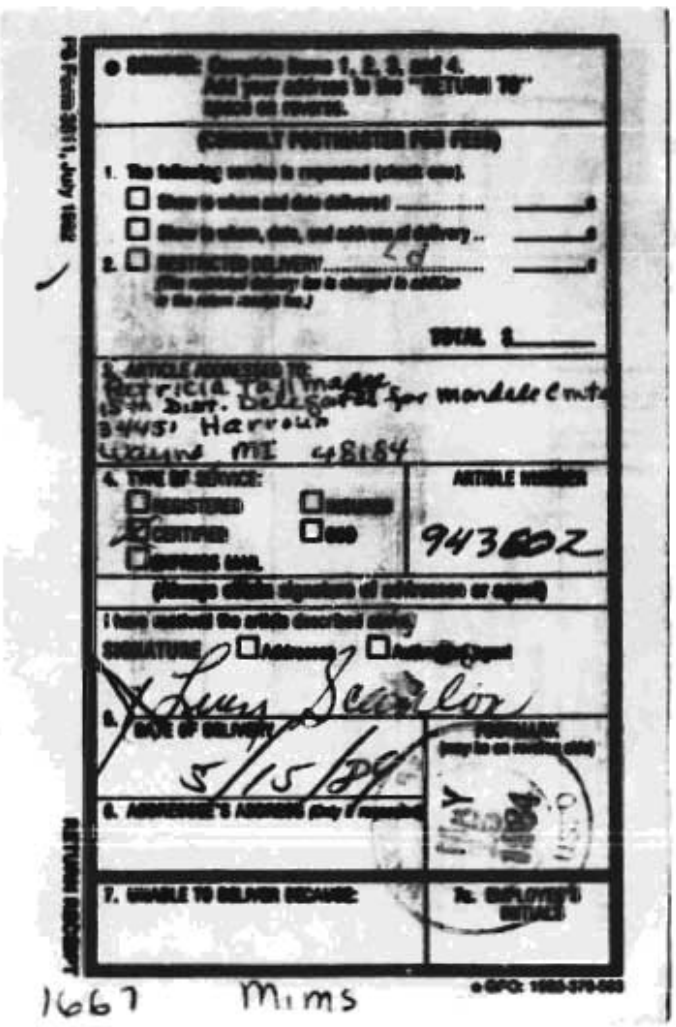
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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



8504050241

RECEIVED AT THE FEC
'84 JUN 4 A9:08

LAW OFFICES OF
MILLER, CANFIELD, PADDOCK AND STONE
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
SUITE 900
150 MICHIGAN AVENUE
LANSING, MICHIGAN 48933

TELEPHONE (517) 487-2070
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DETROIT, MICHIGAN
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BOCA RATON, FLORIDA
GRAND RAPIDS, MICHIGAN
MONROE, MICHIGAN
TRAVERSE CITY, MICHIGAN
WASHINGTON, D.C.

May 30, 1984

MUR 1667
Mims

Stephen Mims, Esq.
Deputy General Counsel
Federal Election Commission
Washington, D.C. 20463

Re: M.U.R. 1667
Sixth District Delegates For Mondale Committee,
No. C 00179697

Dear Mr. Mims:

Enclosed is a notice from the Sixth District Delegates For Mondale Committee ("the Committee"), No. C 00179697, designating this firm as the Committee's counsel.

The Committee hereby requests a 15-day extension of time to enter the Commission's inquiry. This firm received materials relevant to represention of the Committee only yesterday. Certainly the Federal Election Commission will not want to proceed on the basis of incomplete information, and we will require several days to assemble and review the relevant information and advise the Commission concerning the details of the Committee's operation.

We are obviously hampered in this effort by the prolixity and vagueness of the original and amended complaints filed by Americans With Hart, Inc., which do not identify the specific activities of which the Hart campaign complains, and which moreover contain not one word about any Michigan committee, so far as my initial review indicates.

Thank you for your attention and cooperation.

Very truly yours,

MILLER, CANFIELD, PADDOCK and STONE

By Kirk D. Messmer
Kirk D. Messmer

KDM:a
Enclosure

8504012407

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1667

NAME OF COUNSEL: John D. Pirich, Esq.
Kirk D. Messmer, Esq.

ADDRESS: MILLER, CANFIELD, PADDOCK AND STONE
One Michigan Avenue
Suite 900
Lansing, Michigan 48933

TELEPHONE: (517) 487-2070

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.

5/30/84
Date

Signature
Lawrence D. Owen

RESPONDENT'S NAME: Lawrence D. Owen

ADDRESS: 1019 Huntington
East Lansing, Michigan 48823

HOME PHONE: (517) 332-8863

BUSINESS PHONE: (517) 487-2070

8504050243

LAW OFFICES OF
CANFIELD, PADDOCK AND STONE
SUITE 900
ONE MICHIGAN AVENUE
LANSING, MICHIGAN 48933

84 JUN 4 A9:09

Stephen Mims, Esq.
Deputy General Counsel
Federal Election Commission
Washington, D.C. 20463

8500212

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 19, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

6th District Delegate for Mondale
c/o John G. VonDusen
38 Pond Street
Marble Head, MA 01948

Re: MUR 1704

Dear Sir or Madam:

This letter is to notify you that on May 18, 1984 the Federal Election Commission received a complaint which alleges that the committee and its treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1704. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

8504050124

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. 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

8504050246

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Barbara Levin, Treasurer
Prince George's Delegates
For Mondale
3505 Burleigh Drive
Mitchellville, MD 20716

Re: MUR 1667

Dear Ms. Levin:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

8504050247

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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

8504050124 8

Montgomery County for Mondale Delegate Committee

RECEIVED AT THE FEC
84 JUN 14 AM 9:31

MUR #1612

Lucille Maurer
Mary Kellogg (Kelly) Potz
Jane R. Stern
Ellen B. Widoff
Brian E. Barkley
Wendell M. Holloway
Saul I. Stern
William W. Winpisinger

611 Rockville Pike
Suite 15
Rockville, Md. 20852
294-8555

June 6, 1984

Federal Election Commission
Washington, D.C. 20463

Gentlemen:

In response to your letter of May 29, 1984, please be advised that the Montgomery County for Mondale Delegate Committee received only one contribution from a "Union PAC", the Machinists Non-Partisan Political League, and this contribution, which was received on March 23, 1984 was refunded on April 11, 1984.

Under the circumstances, the allegations by the National Right to Work Committee are totally without any factual basis. I would suggest that the Complaint should be more careful in their allegations in the future.

Sincerely,

Otto Unsinn, Treasurer

Subscribed and sworn before me this 6th day of June, 1984.

Mary Ellen Cleveland
Notary Public

My Commission Expires: 7/1/86

8504050249

Paid for by Montgomery County for Mondale Delegate Committee. Otto Unsinn, Treas. Not authorized by Mondale for President, Inc.

9504012250

PRINCE GEORGES, MD
PM
8 JUN
1984

U.S. ARMY

Federal Election Commission
Washington, D.C. 20463

Montgomery County for Mondale Delegate Committee

Mims

RECEIVED AT THE FEC
Cat 3097
84 MAY 22 P2:

Lucille Maurer
Mary Kellogg (Kelly) Petz
Jane R. Stern
Ellen B. Widoff
Brian E. Barkley
Wendell M. Holloway
Saul I. Stern
William W. Winpisinger

611 Rockville Pike
Suite 15
Rockville, Md. 20852
294-6555

Mims

May 21, 1984

25 AM 2:43

Federal Election Commission
Washington, D.C. 20463

Re: MUR 1667

Gentlemen:

In response to your letter of May 11, 1984, please be advised that the Montgomery County for Mondale Delegate Committee is an independent Political Action Committee established by the eight delegates from the Eighth Congressional District of Maryland committed to Walter F. Mondale for the sole purpose of electing those eight individuals as delegates to the Democratic National Convention.

Our Committee had no paid staff, and engaged in purely volunteer activities such as lit dropping and telephone canvassing from private homes. All decisions were made by the eight delegate candidates independently and without consulting with Mondale for President, Inc.

Based on the facts, it is apparent to me that the complaint of the Hart campaign is totally baseless as it relates to the Montgomery County for Mondale Delegate Campaign.

Sincerely,

Otto Unsinn, Treasurer

Subscribed and sworn before me this 21st day of May, 1984.

Mary Ellen Cleveland
Notary Public

Paid for by Montgomery County for Mondale Delegate Committee. Otto Unsinn, Treas. Not authorized by Mondale for President Inc.

8504050125!

vil Pike

e, 2 yland 20852

8504050125

PM
21 MAY
1984

RECEIVED AT FEC
84 MA 22 P12

Federal Election Commission
Washington, D.C. 20463

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Otto Unsinn, Treasurer
Montgomery County For
Mondale Delegate
Committee
51 Monroe Street
Suite 1406
Rockville, MD 20850

Re: MUR 1667

Dear Mr. Unsinn:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

8504050125

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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

8504050125 1

RECEIVED AT THE FEC
GCC#5932
84 DEC 11 P12: 08

December 10, 1984

84 DEC 11 P2:38

Federal Election Commission
Washington, D.C. 20463

Re: MUR 1704

Gentlemen:

This will acknowledge receipt of your letter dated November 30, 1984 relative to the above referenced complaint. Your cooperation in forwarding to me the necessary forms in order that I might file a Termination report of our committee activities is appreciated.

Very truly yours,

Lawrence M. Vincent,
Treasure Mondale Delegate At-Large
Committee For MD

LMV/kak

3504012350

Lombard Street
Floor
org, Maryland 21202





Federal Election Commission
Washington, D.C. 20463

84 DEC 10 P12:07

REC

84 DEC 10 P3:40

RECEIVED AT THE FEC
Gen. # 3602
84 JUN 13 P12:11

June 11, 1984

84 JUN 13 P2:50

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

Re: MUR 1704

Dear Mr. Gross:

Please accept the following as a response to your letter of May 29, 1984 concerning the complaints which have been filed against the Mondale for President Committee, Inc. I was asked to serve as the treasurer for the Mondale Delegate at large Committee, for Maryland which was to be formed in the state of Maryland, at the request of Mr. Edward Lamon, President of the Maryland-D.C. AFL-CIO. Our Committee was formed in early April for the express purpose of attempting to elect as many Mondale Delegates to the Democratic National Convention as possible. This effort would assist in creating more Mondale Delegate at large seats, to be selected based upon the number of actual Delegates elected. Mr. Lamon told me that he believed that we could raise money through the Unions; and, that this money would be used to print sample ballots in the various congressional districts for distribution on election day. The ballots would contain the names of the candidates for Delegate seats, who were committed to Walter Mondale. Our general strategy was to develop a large volunteer work force through the Unions, who would be supplied with election day materials including hats, bumper stickers, lapel pins, ballots, etc. In other words, the normal type of paraphernalia used for electioneering at the polls. We received four checks totaling $12,250.00, all of which came from PACS associated with Unions. A list of these contributions is attached to this letter. Further, we had entered into commitments concerning the purchase of campaign buttons, bumper stickers, lapel pins and plastic hats. We had purchased a large number of balloons which read MONDALE and below it Delegates at Large, which were used by our volunteers to be distributed at Community Centers and Malls and other locations such as that. We had also requested that two separate pieces of literature, which had

8504012057

been developed by the Unions, to be printed for distribution. My dealings during this formulation period in early April were with Mr. Lamon. Mr. Lamon had assured me that all of our campaign plans were being formulated by him, who would act as the Chairman of our Committee; and, in fact, he was directing an effort on the part of the Unions, in Maryland, to help elect as many Mondale Delegates to the convention as possible. To the best of my knowledge all of the purchase orders for balloons and other such items were placed by Mr. Lamon, or by other local volunteers at his request. It was my opinion then, and still is now that we were running our own show.

My first contact with anyone associated with the Mondale for President Committee was on approximately April 27, 1984 when I received a mail-gram requesting that we terminate the activities of our Committee. This request came from Walter F. Mondale.

Upon receiving the telegram, I consulted with Mr. Lamon, and we debated whether or not we should in fact terminate our activities. We were both quite disturbed about the fact that we believed very strongly that we had every right to continue our activities as a Committee. However, we decided that if our activities were going to create a further issue in the campaign, then we should, in the best interest of our favorite candidate, terminate our activities. We had at that point in time received, as I mentioned earlier, four checks totaling $12,250.00. From April 27, 1984 on we did not accept any further contributions, and have not to this date. We further agreed that we should honor all of our Committee's obligations which were outstanding; but, we would not create any further indebtedness. Therefore, we did not follow through with our plans to have ballots printed for election day, and our activities came to an end.

I have spoken with Mr. Lamon since receiving this complaint, which I have read as alleging that we were not independent form the Mondale for President Committee. Mr. Lamon has assured me again that decisions made to purchase items for use in the campaign, were made by him and without instruction to him, from any individuals associated with the Mondale for President Committee, Inc.

We presently have a balance of $173.61 remaining in our

8504030125 3

checking account. Please advise me if you wish any further information concerning our Committee, or its activities. Thank you for your cooperation in this matter.

Very truly yours,

ARNOLD, BEAUCHEMIN & TINGLE, P.A.

Lawrence M. Vincent
Treasurer for the Mondale
Delegate at Large Committee
for Maryland

8504050252

Graphic Communications International
Union-Political Action Fund
Received- 4/26/84 $250.00

Service Employees International Union
Committee on Political Education
Received- 4/4/84 $5,000.00

American Federation of Government
Employees, Political Action Committee
Received- 4/25/84 $2,000.00

Committee on Political Education
AFL-CIO
Received- 4/25/84 $5,000.00

85040501260

Lawrence M. Vincent
16 East Lombard Street
Baltimore, Maryland 21202

84 JUN 13 P12:11

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

CERTIFIED
No. 852337
MAIL

RECEIVED AT THE FEC
Cert # 3332
'84 MAY 28 A8:52

MUR 1667
memo

May 25, 1984

Lawrence M. Noble, Esquire
Deputy General Council
Federal Election Commission
Washington, D.C. 20463

12 PM 2:21

Re: MUR 1667

Dear Mr. Noble:

8504012062

Please accept the following as a response to your letter of May 11, 1984 concerning the complaints which have been filed against the Mondale for President Committee, Inc. I was asked to serve as the treasurer for the Mondale Delegate at large Committee, for Maryland which was to be formed in the state of Maryland, at the request of Mr. Edward Lamon, President of the Maryland-D.C. AFL-CIO. Our Committee was formed in early April for the express purpose of attempting to elect as many Mondale Delegates to the Democratic National Convention as possible. This effort would assist in creating more Mondale Delegate at large seats, to be selected based upon the number of actual Delegates elected. Mr. Lamon told me that he believed that we could raise money through the Unions; and, that this money would be used to print sample ballots in the various congressional districts for distribution on election day. The ballots would contain the names of the candidates for Delegate seats, who were committed to Walter Mondale. Our general strategy was to develop a large volunteer work force through the Unions, who would be supplied with election day materials including hats, bumper stickers, lapel pins, ballots, etc. In other words, the normal type of paraphernalia used for electioneering at the polls. We received four checks totaling $12,250.00, all of which came from PACS associated with Unions. Further, we had entered into commitments concerning the purchase of campaign buttons, bumper stickers, lapel pins and plastic hats. We had purchased a large number of balloons which read MONDALE and below it Delegates at Large, which were used by our volunteers to be distributed at Community Centers and Malls and other locations such as that. We had also requested that two separate pieces of literature, which had

been developed by the Unions, to be printed for distribution. My dealings during this formulation period in early April were with Mr. Lamon. Mr. Lamon had assured me that all of our campaign plans were being formulated by him, who would act as the Chairman of our Committee; and, in fact, he was directing an effort on the part of the Unions, in Maryland, to help elect as many Mondale Delegates to the convention as possible. To the best of my knowledge all of the purchase orders for balloons and other such items were placed by Mr. Lamon, or by other local volunteers at his request. It was my opinion then, and still is now that we were running our own show.

My first contact with anyone associated with the Mondale for President Committee was on approximately April 27, 1984 when I received a mail-gram requesting that we terminate the activities of our Committee. This request came from Walter F. Mondale.

Upon receiving the telegram, I consulted with Mr. Lamon, and we debated whether or not we should in fact terminate our activities. We were both quite disturbed about the fact that we believed very strongly that we had every right to continue our activities as a Committee. However, we decided that if our activities were going to create a further issue in the campaign, then we should, in the best interest of our favorite candidate, terminate our activities. We had at that point in time received, as I mentioned earlier, four checks totaling $12,250.00. From April 27, 1984 on we did not accept any further contributions, and have not to this date. We further agreed that we should honor all of our Committee's obligations which were outstanding; but, we would not create any further indebtedness. Therefore, we did not follow through with our plans to have ballots printed for election day, and our activities came to an end.

I have spoken with Mr. Lamon since receiving this complaint, which I have read as alleging that we were not independant from the Mondale for President Committee. Mr. Lamon has assured me again that decisions made to purchase items for use in the campaign, were made by him and without instruction to him, from any individuals associated with the Mondale for President Committee, Inc.

We presently have a balance of $193.31 remaining in our

8504301263

checking account. In addition, the only outstanding debt that I am aware of at this time, would be a reimbursement to myself in the amount of $19.00 for two Express mailings to the FEC.

Please advise me if you wish any further information concerning our Committee, or its activities. Thank you for your cooperation in this matter.

Very truly yours,

Lawrence M. Vincent
Treasurer for the Mondale
Delegate at Large Committee
for Maryland

8504030126 4

Lawrence M. Vincent
16 East Lombard Street
Third Floor
Baltimore, Maryland 21202

84 MAY 29 AM: 52

Lawrence M. Noble, Esquire
Deputy General Council
Federal Election Commission
Washington, D.C. 20463

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Lawrence M. Vincent, Treasurer
Mondale Delegate At-Large
Committee For MD
16 East Lombard Street-310 MD
Baltimore, MD 21202

Re: MUR 1667

Dear Mr. Vincent:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

8504012666

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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

8504050012 67

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Alma Bell, Treasurer
Seventh District Delegates
For Mondale
538 W.Lafayette
Baltimore, MD 21217

Re: MUR 1667

Dear Ms. Bell:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

8504012263

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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

8504050126 9

RECEIVED AT THE FEC
84 JUN 8 A10:28

THOMAS G. SLATER
ATTORNEY AT LAW
SUITE 10
AMBER MEADOWS PROFESSIONAL BUILDING
198 THOMAS JOHNSON DRIVE
FREDERICK, MARYLAND 21701

TELEPHONE (301) 662-7252

June 6, 1984

Federal Election Commission
Washington, D.C. 20463

Attention: Charles N. Steele
General Counsel

Re: MUR 1704

Dear Mr. Steele:

I am in receipt of your letter sent by certified mail dated May 29, 1984. Please accept this letter as a response to that letter.

Our committee was set up on March 26, 1984 for the limited purpose of raising money to help elect the five delegates running in the 6th congressional district of Maryland who were committed to Walter Mondale. We raised a total of $885.00. No single contribution exceeded $100.00 and we received no PAC funds. Our efforts consisted of grassroots activities designed to help elect the five Mondale delegates. Money was spent for a reception for the delegate candidates, tickets to local political functions, volunteer activity, and the printing of hand cards to hand out on election day urging voters to vote for the delegates. Our committee operated independently from the Mondale for President campaign.

Please contact me if further information is needed.

Sincerely,

Thomas G. Slater

Thomas G. Slater, Treasurer
Sixth District Delegates
for Mondale

TGS:sls
cc: Galen R. Clagett
Evelyn Maphis
James F. Combs
Susan Panek
Betty Workman

3504012700

THOMAS G. SLATER
ATTORNEY AT LAW
-- SUITE 10
MEADOWS PROFESSIONAL BUILDING
8 THOMAS JOHNSON DRIVE
FREDERICK, MARYLAND 21701





Federal Election Commission
Washington, D.C. 20463

Attention: Charles N. Steele
General Counsel

RECEIVED AT THE FEC
Cert # 3324
84 MAY 29 A9:00

THOMAS G. SLATER
ATTORNEY AT LAW
SUITE 10
AMBER MEADOWS PROFESSIONAL BUILDING
196 THOMAS JOHNSON DRIVE
FREDERICK, MARYLAND 21701

TELEPHONE (301) 662-7222

MUR 1667
Memo

29 P10:14

May 23, 1984

Federal Election Commission
Washington, D.C. 20463
Attention: Charles N. Steele
General Counsel

Re: MUR 1667

Dear Mr. Steele:

I am in receipt of your letter sent by certified mail dated May 11, 1984. Please accept this letter as a response to that letter.

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Please contact me if further information is needed.

Sincerely,

Thomas G. Slater

Thomas G. Slater

c.c. Galen R. Clagett
Evelyn Maphis
James F. Combs
Susan Panek
Betty Workman

8504050127 2

THOMAS G. SLATER
ATTORNEY AT LAW
SUITE 10
ASONS PROFESSIONAL BUILDING
THOMAS JOHNSON DRIVE
DERICK, MARYLAND 21701





Federal Election Commission
Washington, D.C. 20463
Attention: Charles N. Steele
General Counsel

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Thomas G. Slater, Treasurer
Sixth District Delegates For
Mondale
198 Thomas Johnson Drive #10
Frederick, MD 21701

Re: MUR 1667

Dear Mr. Slater:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

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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.

8504001274

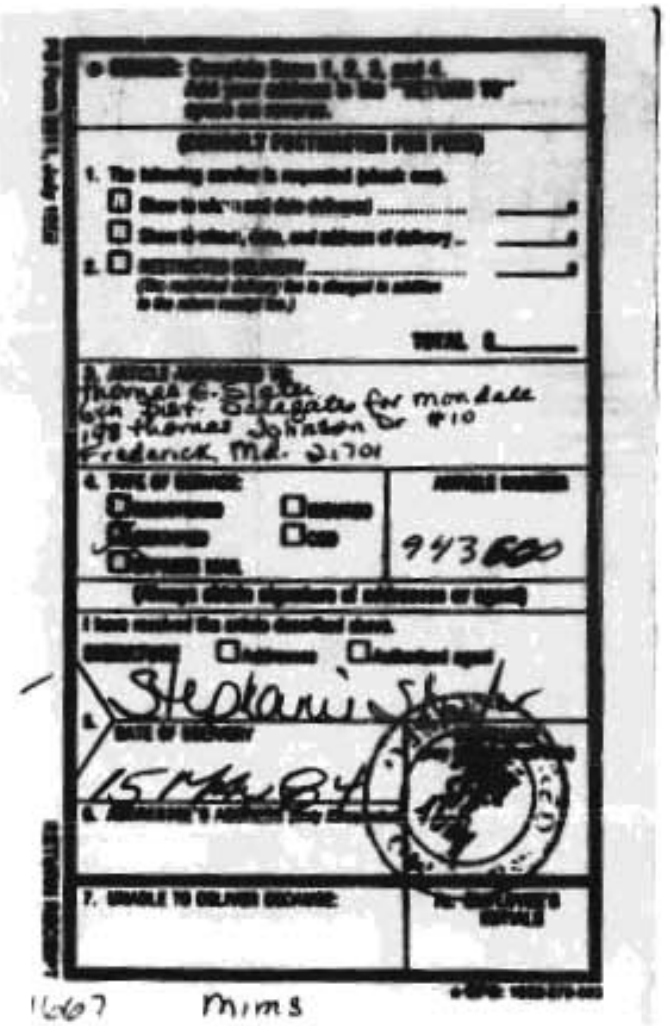
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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



1667 Mims

44 Madison Place
Annapolis, Maryland 21401
June 18, 1984

92 SEP 26 02:26

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

Attn: Stephen Mims

Re: In The Matter of MUR 1704

To Whom It May Concern:

I am in receipt of your letter regarding a Complaint by the National Right to Work Committee against Mondale for President Campaign Committee, et al. (MUR 1704).

As I read the Complaint, individual Delegate Committees are not specifically charged with violations, as your cover letter suggests.

However, I recently answered another Complaint, MUR 1667. Since I have nothing further to add, that letter is appended for your information.

Very truly yours,

Ellen O. Moyer

Ellen O. Moyer
Treasurer
4th District Delegates
for Mondale

Attachment
cc: Bob Berger

8504050127 6

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

44 Madison Place
Annapolis, Maryland 21401
May 23, 1984

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

Attention: Stephen Mims

Re: In The Matter of MUR 1667

To Whom It May Concern:

I resent the charge that I have violated FEC regulations and I wonder if Mr. Hart's complaint will, in fact, discourage citizen campaign participation in the future.

The 4th District Delegates for Mondale was organized several weeks prior to the May 8th Primary Election in Maryland by the Delegates themselves. The Delegates met once a week to develop campaign plans, a budget, and to coordinate calendars. No Mondale national staff member was ever present nor, to my knowledge, contributed to our Delegates' campaign.

The campaign was financed by contributions from the Delegates themselves, contributions from our Senator, one Congressional Representative, and the sale of tickets to a fund-raising event.

Approximately $3,500.00 was raised and spent on headquarters, one coordinator from the local community, and printed material.

The Committee is trying to close its books and pay its bills in a business-like fashion. And the Delegates, all of whom were elected, continue to meet with the local volunteers in their election.

It is unclear to me from your letter of May 11 exactly what I (and "the Committee") am being accused of...

8504050127 7

To the extent that I understand the complaint as some sort of collusion, I believe it to be frivilous, harassing, and erroneous with respect to the way of work of the 4th District Delegates for Mondale Committee. I believe no action against this Committee is warranted.

Sincerely,

Ellen O. Moyer

Ellen O. Moyer
Treasurer
4th District Delegates
for Mondale

8504050127 8

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ellen O. Moyer, Treasurer
4th District Delegates
For Mondale
44 Madison Place
Annapolis, MD 21401

Re: MUR 1667

Dear Ms. Moyer:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

8504050279

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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

8504050012 80

Madison Place
napolis, Maryland 21401

8504050128



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

Attn: Stephen Mims

RECEIVED AT THE FEC
Doc # 3347
84 MAY 29 PM 2:48

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

44 Madison Place
Annapolis, Maryland 21401
May 23, 1984

MUR 1667
Memo

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

Attention: Stephen Nims

29 4:46

Re: In The Matter of MUR 1667

To Whom It May Concern:

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8504050128 2

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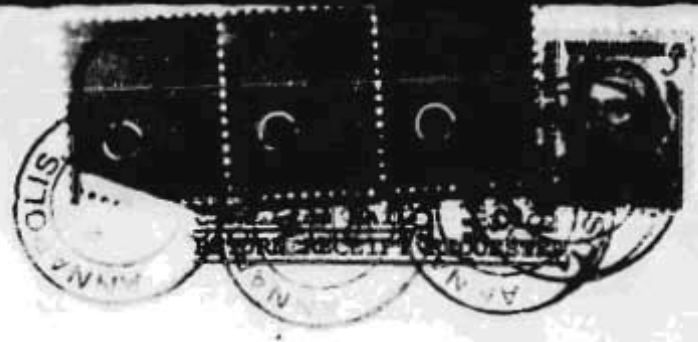
Sincerely,

Ellen O. Moyer

Ellen O. Moyer
Treasurer
4th District Delegates
for Mondale

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rict Delegates
ndale
on Place
Maryland 21401



CERTIFIED

P 589 608 983

MAIL

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

Attention: Stephen Mims

BCC #3294

RECEIVED BY THE FEC

84 JUN 20 AM 10:40

STATEMENT OF DESIGNATION OF COUNSEL

MUR MUR 1704

NAME OF COUNSEL: Bob Berger

ADDRESS: 115 Franklin Avenue
Silver Springs, Maryland 20901

TELEPHONE: (202) 872-0013 / (301) 588-5660

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 16, 1984
Date

Ellen O. Moyer
Signature

RESPONDENT'S NAME: Ellen O. Moyer

ADDRESS: P.O. Box 3172
Annapolis, Maryland 21403

HOME PHONE: (301) 269-6828

BUSINESS PHONE: 261-1333 (D.C.)

8504050128 5

84 JUN 20 P12:29

RECEIVED AT THE FEC
Scott 31.9
84 MAY 18 P1:24

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1667

NAME OF COUNSEL: BOB BERGER

ADDRESS: 115 FRANKLIN AVE
SILVER SPRINGS,
MARYLAND 20901

TELEPHONE: 202-872-0013 / 301-588-5660

MUR 1667 Memo

84 MAY 18 P2:27

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 16, 1984
Date

Ellen O. Moyer
Signature

RESPONDENT'S NAME: ELLEN O. MOYER

ADDRESS: P.O. BOX 3172
ANNAPOLIS,
MARYLAND 21403

HOME PHONE: 301-269-6828

BUSINESS PHONE: 261-1333 (D.C.)

9504050129 5

3172

2403

35043 1 28

FEDERAL ELECTION COMMISSION
1325 K STREET NW
WASHINGTON DC. 20463

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ellen O. Moyer, Treasurer
4th District Delegates
For Mondale
44 Madison Place
Annapolis, MD 21401

Re: MUR 1667

Dear Ms. Moyer:

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8504050128

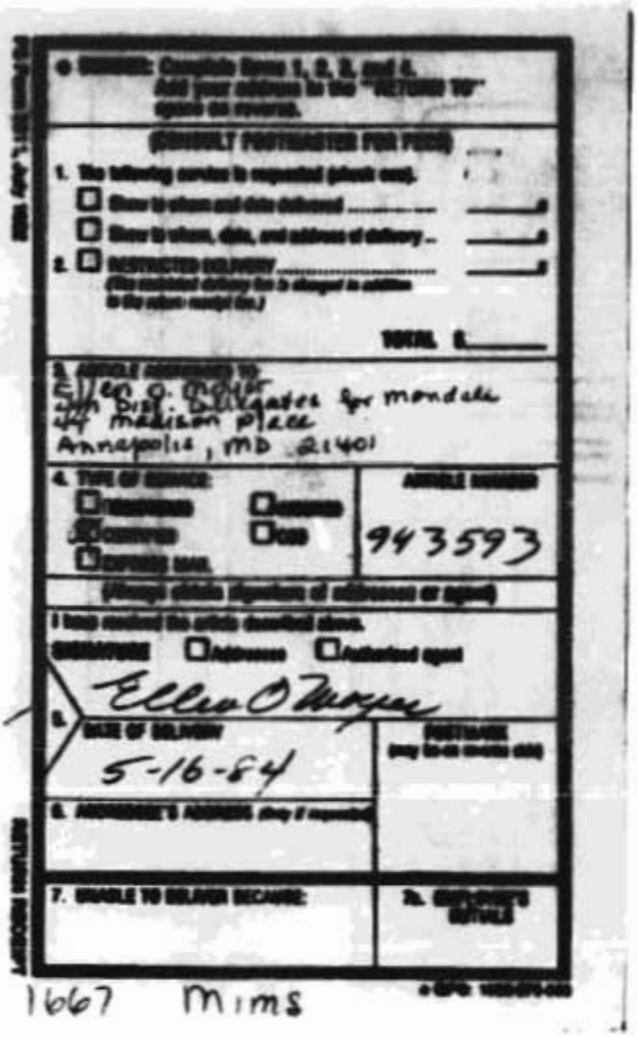
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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



84 MAY 29 P1:05

5835 Belair Road
Baltimore, Md. 21206

May 25, 1984

MUR 1667
Mems

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

Re: MUR 1667

Dear Mr. Steele:

This is in reply to your letter of May 11, 1984, in which you requested certain information in connection with the Third District Delegates For Mondale, for which I was the Treasurer.

The Third District Delegates For Mondale was formed as an independent grassroots effort to elect a slate of convention hopefuls who were pledged to Walter Mondale.

Since the Democratic Presidential race in Maryland was basically a "beauty contest" or preference poll, the decision was made to concentrate on the election of the six delegates and two alternates.

The Third District Delegates For Mondale was formed on March 15, 1984, and raised $4,625.00 between that date and the primary election. No PAC money was accepted or contributed. The principal contributors were the Mikulski For Congress Committee and Citizens For Sarbanes.

No funds were spent on staff. All personnel were volunteers.

The major expenditures were for printing of campaign literature, rent, and telephones. There were no residual monies.

All literature printed carried the following: " Paid for by THIRD DISTRICT DELEGATES FOR MONDALE Frank Lidinsky, Treasurer and not authorized by Mondale for President." See attached Exhibit # 1. A second printing of the card reflected the lever numbers of the candidates.

8504301290

When securing telephone service from C&P Telephone, a statement was required as to our affiliation, if any, with the national campaign committee for Walter Mondale. Exhibit #2 is a copy of our memo stating our independence from the national effort.

All of the Delegates' activities were autonomous from any direction or control from the Mondale for President Committee, Inc.

For all of the above state reasons, I believe that no action should be taken against me as Treasurer for the Third District Delegates For Mondale.

In keeping with your established procedure, I request that this matter be kept confidential.

If you have any further questions or need any additional information, please contact me at 5835 Belair Road, Baltimore, Maryland 21206 (Tel: 301-483-2701).

Sincerely yours,

Frank G. Lidinsky

Enc.

3504050129 1

E 10

On May 8th Vote for
WALTER MONDALE FOR PRESIDENT

BARBARA MIKULSKI
FOR CONGRESS
AND
Third District Delegates For Mondale



ALVIN AKMAN
Pikesville
President, Local 27, United Food and Commercial Workers

DOMINIC "Mimi" DIPIETRO
Highlandtown
City Councilman, First District





RONALD B. HICKERNELL
Catonsville
County Councilman, First District; Council Chairman

HYMAN A. PRESSMAN
Northwest Baltimore
Comptroller, City of Baltimore





A. JEANNETTE CURRAN
Northeast Baltimore
Legislative Aide, General Assembly; Community and Civic Leader

LORRETTA JOHNSON
Randallstown
Educator, BTU Official





RUTH KEETON
Columbia
Chairperson, Howard County Council

JAMIE E. McGUIRK
South Baltimore
Young Democrats and Community Leader



MONDALE HEADQUARTERS, 1035 S. Charles St., Baltimore, Md. 21230, 539-1920

Paid for by
THIRD DISTRICT DELEGATES FOR MONDALE
Frank Lidinsky, Treasurer
and not authorized by Mondale for President

On May 8 Vote for
WALTER MONDALE FOR PRESIDENT

LEVER **3B**

BARBARA MIKULSKI
FOR CONGRESS **4C**
AND
The Mondale Delegates



A. JEANNETTE CURRAN **18C**
Northeast Baltimore
Legislative Aide, General Assembly; Community and Civic Leader



LORRETTA JOHNSON **21C**
Randallstown
Educator, BTU Official



RUTH KEETON **22A**
Columbia
Chairperson, Howard County Council



JAMIE E. McGUIRK **22D**
South Baltimore
Young Democrats and Community Leader



ALVIN AKMAN **25B**
Pikesville
President, Local 27, United Food and Commercial Workers



DOMINIC "Mimi" DIPIETRO **27C**
Highlandtown
City Councilman, First District



RONALD B. HICKERNELL **29B**
Catonsville
County Councilman, First District, Council Chairman



HYMAN A. PRESSMAN **34A**
Northwest Baltimore
Comptroller, City of Baltimore

MONDALE HEADQUARTERS, 1035 S. Charles St., Baltimore, Md. 21230, 539-1920

Paid for by
THIRD DISTRICT DELEGATES FOR MONDALE
Frank Lidinsky, Treasurer
and not authorized by Mondale for President

Ex 1

On May 8th Vote for
WALTER MONDALE FOR PRESIDENT

BARBARA MIKULSKI
FOR CONGRESS
AND
Third District Delegates For Mondale



ALVIN AKMAN
Pikesville
President, Local 27, United Food and Commercial Workers

DOMINIC "Mimi" DIPIETRO
Highlandtown
City Councilman, First District





RONALD B. HICKERNELL
Catonsville
County Councilman, First District, Council Chairman

HYMAN A. PRESSMAN
Northwest Baltimore
Comptroller, City of Baltimore





A. JEANNETTE CURRAN
Northeast Baltimore
Legislative Aide, General Assembly; Community and Civic Leader

LORRETTA JOHNSON
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Educator, BTU Official





RUTH KEETON
Columbia
Chairperson, Howard County Council

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South Baltimore
Young Democrats and Community Leader



MONDALE HEADQUARTERS, 1035 S. Charles St., Baltimore, Md. 21230, 539-1920

Paid for by
THIRD DISTRICT DELEGATES FOR MONDALE
Frank Lidinsky, Treasurer
and not authorized by Mondale for President

8504050129 3

On May 8 Vote for
WALTER MONDALE FOR PRESIDENT
LEVERS 3B

BARBARA MIKULSKI 4C
FOR CONGRESS
AND
The Mondale Delegates



A. JEANNETTE CURRAN 18C
Northeast Baltimore
Legislative Aide, General Assembly; Community and Civic Leader



LORRETTA JOHNSON 21C
Randallstown
Educator, BTU Official



RUTH KEETON 22A
Columbia
Chairperson, Howard County Council



JAMIE E. McGUIRK 22D
South Baltimore
Young Democrats and Community Leader



ALVIN AKMAN 25B
Pikesville
President, Local 27, United Food and Commercial Workers



DOMINIC "Mimi" DIPIETRO 27C
Highlandtown
City Councilman, First District



RONALD B. HICKERNELL 29B
Catonsville
County Councilman, First District; Council Chairman



HYMAN A. PRESSMAN 34A
Northwest Baltimore
Comptroller, City of Baltimore

MONDALE HEADQUARTERS, 1035 S. Charles St., Baltimore, Md. 21230, 539-1920

Paid for by
THIRD DISTRICT DELEGATES FOR MONDALE
Frank Lidinsky, Treasurer
and not authorized by Mondale for President

Ex (2)

TO: POLITICAL ACCOUNTS DIVISION
C&P TELEPHONE COMPANY

FROM: THE THIRD DISTRICT DELEGATES FOR MONDALE

This is to state that the Third District Delegates for Mondale committee is a delegate selection committee from the third congressional district of the State of Maryland. The committee is a separate legal entity from the Mondale for President national campaign committee.

The Third District Delegates for Mondale committee is solely responsible for payment of services provided by the C&P Telephone Company.

Sincerely,

Frank Lidinsky 04/04/84
Frank Lidinsky
Treasurer

8504050129 4

rank G. Lidinsky
835 Belair Road
altimore, Md. 21206

8504050195

RECEIVED BY THE FEC
BALTIMORE MD
84 MAY 25 P 1:05

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

4

CERTIFIED
P 472 229 039

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Frank Lidinsky, Treasurer
Third District Delegates
For Mondale
1035 S. Charles Street
Baltimore, MD 21230

Re: MUR 1667

Dear Mr. Lidinsky:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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8504012960

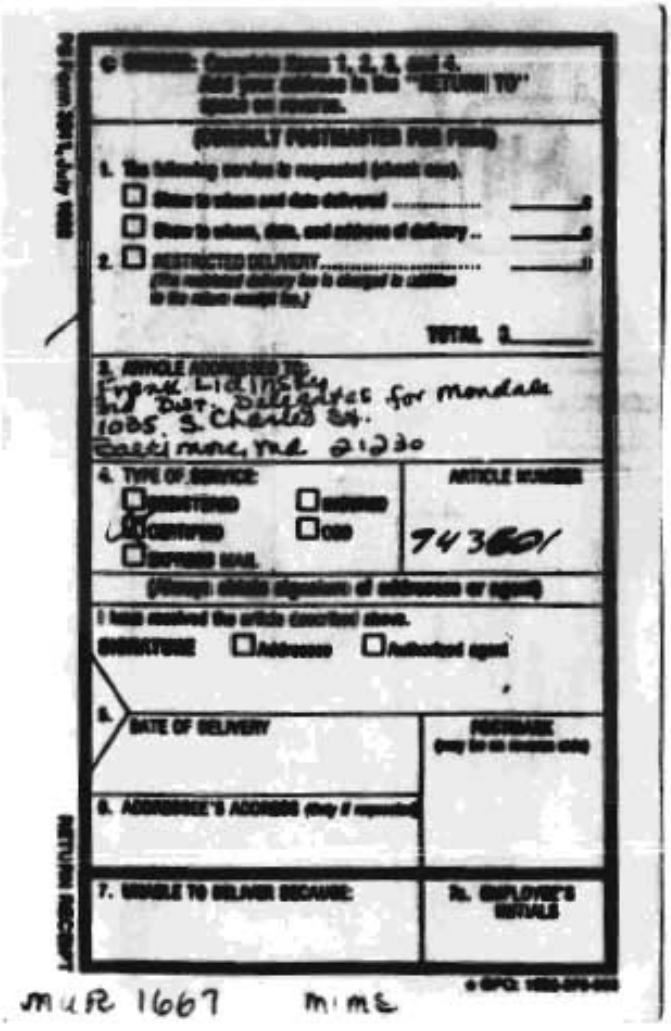
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Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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



9504050129 7

Cath 376

RECEIVED BY THE FEC

84 JUN 25 A8:39

84 JUN 25 A10:08

June 14, 1984

Mr. Kenneth A. Gross
Associate General Counsel
1325 K Street, N.W.
Washington, DC 20463

RE: MUR 1704

Dear Mr. Gross:

In response to the complaint which alleges the committee and myself, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, I respectfully submit the enclosed letter which was in response to MUR 1667.

The enclosed letter will verify that the Second District Delegates for Mondale in Maryland was not in violation of Federal Election Campaign regulations.

Sincerely,

Joan S. Rudolph

Joan S. Rudolph

8504001298

8504050129

May 28, 1984

Mr. Lawrence M. Noble
Deputy General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20463

RE: MUR1667

Dear Mr. Noble:

This letter is to notify you that I, as Treasurer for the Second District Delegates for Mondale, have not violated the Federal Election Campaign of 1971. Money raised for our efforts for the Delegates in the Second District was through contributions made by the Delegates themselves, their friends and elected officials within our District. Enclosed is a copy of the letter from the United Steelworkers of America stating that their PAC Voluntary check was returned to them.

We operated on a budget of $2,275.00. A headquarters was given as an in-kind contribution by Barbara Bachur and set up three weeks before the primary. A single phone with one line was installed April 19th for $317.37 by the C&P Telephone Company of Maryland. Printing expenses for handbills was $1,617.00 to Kogan Printing in Baltimore, Maryland. This literature was used to campaign door-to-door and on election day in the Second District of Maryland. $85.00 was spent to register for a booth at the Towson Towne Festival held within our District on May 5th. The costs of Balloons, decorations, and miscellaneous expenses for that day were $100.00. Our checking account was opened with $50.00 of the Treasurer's money and withdrawn in her name on May 4, 1984. Currently our account has a balance of $105.63 and is held by the Union Trust Company of Maryland.

I appreciate your concern in maintaining the rules and regulations set by the Federal Election Commission and appreciate you giving me the opportunity to explain the campaign of the Delegates of the Second District of Maryland.

Sincerely,

Joan S. Rudolph

Enclosure

8504050013 00

UNITED STEELWORKERS OF AMERICA

POLITICAL ACTION FUND

Lloyd McBride
CHAIRMAN

FIVE GATEWAY CENTER
PITTSBURGH, PA. 15222
562-2400

Frank S. McKee
TREASURER

May 8, 1984

Ms. Joan S. Rudolph, Treasurer
Second Congressional District for Mondale
7119 Heathfield
Baltimore, MD 21212

Dear Ms. Rudolph:

We wish to thank you for receipt of your Check No. 003, dated April 27, 1984, in the amount of $2,000.00, which has been received and recorded as reimbursement for our PAC Voluntary Check No. 1292, dated April 17, 1984, in the amount of $2,000.00.

We had previously forwarded our PAC Voluntary Check No. 1292 to you and your Committee as a contribution for the Maryland 2nd Congressional District Mondale Delegates slate.

Sincerely,

Paul D. Bour

PDB/mh

85040501301

8504 [illegible] 302

84 JUN 25 A 8:39

Mr. Kenneth A. Gross
Associate General Counsel
1325 K Street, N.W.
Washington, DC 20463

RECEIVED AT THE FEC
GCC# 3379
84 MAY 31 A8:44

MUR 1667
Memo

84 MAY 31 P9:40

May 28, 1984

Mr. Lawrence M. Noble
Deputy General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20463

RE: MUR1667

Dear Mr. Noble:

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9504501303

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Sincerely,

Joan S. Rudolph

Enclosure

85040501304

UNITED STEELWORKERS OF AMERICA

POLITICAL ACTION FUND

Lloyd McBride
CHAIRMAN

FIVE GATEWAY CENTER
PITTSBURGH, PA. 15222
562-2400

Frank S. McKee
TREASURER

May 8, 1984

Ms. Joan S. Rudolph, Treasurer
Second Congressional District for Mondale
7119 Heathfield
Baltimore, MD 21212

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Sincerely,

Paul D. Bour

PDB/mh

85040501305

ore Briefing Center
400 Charles Center South
th Charles Street
ore, Maryland 21201



Mr. Lawerence M. Noble
Deputy General Coubsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C., 20463

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Joan Sanders Rudolph, Treasurer
Second District Delegates For
Mondale
7119 Heathfield Road
Baltimore, MD 21212

Re: MUR 1667

Dear Ms. Rudolph:

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8504013 07

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Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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

8504301308

RECEIVED AT THE FEC

84 JUN 20 A8:44

GCC # 3691

84 JUN 20 A9:21

June 9, 1984

Charles N. Steele
General Council
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20436

Dear Sir:

This letter is in response to your May 29, 1984 request to answer charges that our Maryland committee, "First District Delegates for Mondale" may have violated certain sections of the Federal Election Campaign Act of 1971. You have numbered the matter MUR 1704.

Attached is a copy of my letter to you of May 25, 1984 addressing matter MUR 1667. I believe that this adequately answers the latest charges.

Sincerely,

James M. Voss

James M. Voss, Treas.
First District Delegates
for Mondale

3504050013092

JAMES A. VOSS
RT I, BOX 183
DENTON, MD. 21629

May 25, 1984

Charles N. Steele
General Council
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20436

Dear Sir:

This letter is in response to your May 11, 1984 request to answer charges that our Maryland committee, "First District Delegates for Mondale", may have violated certain sections of the Federal Election Campaign Act of 1971. You have numbered the matter MUR 1667.

On March 22, 1984, five of six First District Delegates committed to Walter Mondale met to plan a concerted effort to elect the full Mondale slate in Maryland's First Congressional District. They, in the presence of some fifteen (15) or twenty (20) other local supporters, agreed to form "First District Delegates for Mondale" and asked me to serve as their treasurer. The purpose of this committee was to raise local funds from individuals for the preparation of posters, handbills, and yard signs, promoting the Mondale Delegate slate, to be used in the First District Democratic Primary on May 8, 1984.

At no time did we have direct or indirect personal contact with any member of the national Mondale for President organization. However, we did follow written guidelines sent to Mondale delegates from Bob Beckel and Elaine Kamarck, dated January 12, 1984. They were entitled "Delegate Expenditure Committees" and "Conducting Your Campaign for Delegate to the National Convention."

The delegate candidates decided to hold four (4) receptions throughout the District in order for voters to become better acquainted with the candidates and to raise money for authorized expenditures. At each reception, light hors d'ouvres were served. Tickets to the event were sold at $7.50 or $10.00 per person. The receptions were held in Easton and Salisbury on April 15, in Havre De Grace on April 24, and near Mechanicsville on April 28.

The six delegate candidates and some of their supporters made initial contributions ranging from $25.00 to $100.00 each, and I opened a checking account for "First District Delegates for Mondale" at the Peoples Bank of Maryland, in Denton, on March 27, 1984. Later deposits were made as the receptions were held

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and payments for admission tickets were collected. Total money received and deposited was $4118.00. This included amounts ranging from $5.00 to $100.00 from 265 First District resident individuals, $250.00 from one First District resident individual, and $375.00 from the reelection campaign fund of Congressman Roy Dyson. Photocopies of all checks received have been retained.

Much of this information has been timely reported to the Federal Election Commission on Form 3X, due April 15, 1984 and April 26, 1984 under I.D. number C00180703.

Expenditures of the committee, by check, include:

Peoples Bank of Maryland- Check purchase	$ 2.98
Kogan Printers - 2200 reception tickets, 74,000 campaign cards	1896.83
Tidewater Inn - Buffet service (Easton)	200.34
Johnny's and Sammy's - Buffet service (Salisbury)	522.00
Dorothy Burdette - Buffet service (Havre De Grace)	73.00
Barbara Risacher- Buffet service (Havre De Grace)	52.18
Karl Pense - Buffet service (Mechanicsville)	47.25
Nancy Simpson - Volunteer reimbursement	600.00
Total	3395.18

Nancy Simpson is a Maryland resident who offered her full time service for several weeks to coodinate our campaign for Calvert, Charles and St. Mary's Counties, in Southern Maryland.

We currently have a balance of $722.82 in our account at Peoples Bank of Maryland. This amount is sufficient to meet any legitimate outstanding expenses which may yet be claimed.

During the entire period from the time of our organization on March 22 to the present, we have attempted to operate in a manner consistent with the Federal Election Campaign Act of 1971, and by guidelines provided to Mondale delegates and committee treasurers.

It is my opinion that the "First District Delegates for Mondale" committee has accomplished this. I trust that you will agree with my assessment.

If additional information is necessary, please advise me as soon as possible.

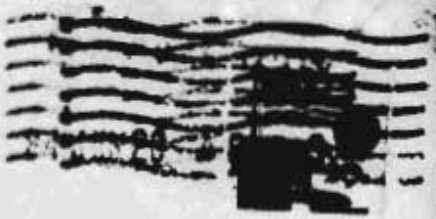
Sincerely,

James M. Voss, Treas.
First District Delegates
for Mondale

Attachment
1. Reception Ticket
2. Handbill Samples

8504031 1





Charles N. Steele
General Council
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. [redacted]

3040 0312

RECEIVED BY THE FEC
84 MAY 29 P1:03
84 MAY 29 A9:43

JAMES M. VOSS
P.O. BOX 133
DENTON, MD 21629

May 25, 1984

MUR 1667
Memo

Charles N. Steele
General Council
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20436

Dear Sir:

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8504050313

and payments for admission tickets were collected. Total money received and deposited was $4118.00. This included amounts ranging from $5.00 to $100.00 from 265 First District resident individuals, $250.00 from one First District resident individual, and $375.00 from the reelection campaign fund of Congressman Roy Dyson. Photocopies of all checks received have been retained.

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Barbara Risacher- Buffet service (Havre De Grace)	52.18
Karl Pense - Buffet service (Mechanicsville)	47.25
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Total	3395.18

Nancy Simpson is a Maryland resident who offered her full time service for several weeks to coodinate our campaign for Calvert, Charles and St. Mary's Counties, in Southern Maryland.

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It is my opinion that the "First District Delegates for Mondale" committee has accomplished this. I trust that you will agree with my assessment.

If additional information is necessary, please advise me as soon as possible.

Sincerely,

James M. Voss

James M. Voss, Treas.
First District Delegates
for Mondale

Attachment
1. Reception Ticket
2. Handbill Samples

8504030314

On May 8 Vote for

LEVER

WALTER MONDALE 3B
FOR PRESIDENT
AND
FIRST DISTRICT DELEGATES FOR MONDALE



PEARL M. FINNISSEY — **7A**
Harford
Retired Newspaper Writer; Officer of numerous Democratic Clubs



BARBARA A. JOHNSON — **7C**
Dorchester
Chairperson, A. Phillip Randolph Institute; Textile Worker



CATHERINE MILNER — **8D**
Charles
Small Businesswomen; Community and Civic Leader



ALAN L. GOLDSTEIN — **14B**
Queen Anne's
Businessman; Chairman, Queen Anne's County Central Committee



H. EUGENE O'BRIEN — **15C**
Wicomico
Business Representative, United Food and Commercial Workers



KARL K. PENCE, JR. — **15D**
St. Mary's
Teacher; President, St. Mary's Education Association

FOR MORE INFORMATION CALL 301-539-1820

Paid for by
FIRST DISTRICT DELEGATES FOR MONDALE
Jim Voss, Caroline County, Treasurer
Not authorized by Mondale for President

MONDALE for PRESIDENT

RECEPTION IN HONOR OF

THE FIRST DISTRICT DELEGATES FOR MONDALE

ALAN L. GOLDSTEIN KARL K. PENCE, JR. BARBARA A. JOHNSON
H. EUGENE O'BRIEN PEARL M. FINNISSEY CATHERINE MILNER

Special Guest: COMPTROLLER LOUIS GOLDSTEIN

SUNDAY, APRIL 15, 1984 • 3:30 p.m. - 5:30 p.m.
TIDEWATER INN • CRYSTAL ROOM
EASTON, MARYLAND

No 973

Contribution
$7.50 per person

☐ Yes, I will attend the Reception and am enclosing
$ _____ Number in party _____

☐ No, I will not attend, but am enclosing $ _____
Donation

Name _____

Address _____ Phone _____

City _____ State _____ Zip _____

Occupation _____

Employer _____

Please detach this stub and return with your check payable to:
FIRST DISTRICT DELEGATES FOR MONDALE
RD 1, Box 183 — Denton, Maryland 21629

Paid for by
FIRST DISTRICT DELEGATES FOR MONDALE
Jim Voss, Caroline County, Treasurer
Not endorsed by Mondale for President

No 973

MONDALE for PRESIDENT

RECEPTION IN HONOR OF

THE FIRST DISTRICT DELEGATES FOR MONDALE

ALAN L. GOLDSTEIN KARL K. PENCE, JR. BARBARA A. JOHNSON
H. EUGENE O'BRIEN PEARL M. FINNISSEY CATHERINE MILNER

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No. 973

☐ Yes, I will attend the Reception and am enclosing $_____ Number in party _____

☐ No, I will not attend, but am enclosing $_____ Donation

Name _____

Address _____ Phone _____

City _____ State _____ Zip _____

Occupation _____

Employer _____

Please detach this stub and return with your check payable to:
FIRST DISTRICT DELEGATES FOR MONDALE
RD 1, Box 183 — Denton, Maryland 21629

Paid for by
FIRST DISTRICT DELEGATES FOR MONDALE
Jim Vitek, Caroline County, Treasurer
and not authorized by Mondale for President

No. 973

8504050131 7

MONDALE for PRESIDENT

RECEPTION IN HONOR OF

THE FIRST DISTRICT DELEGATES FOR MONDALE

ALAN L. GOLDSTEIN KARL K. PENCE, JR. BARBARA A. JOHNSON
H. EUGENE O'BRIEN PEARL M. FINNISSEY CATHERINE MILNER

Special Guest: COMPTROLLER LOUIS GOLDSTEIN

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Name _____

Address _____ Phone _____

City _____ State _____ Zip _____

Occupation _____

Employer _____

Please detach this stub and return with your check payable to:
FIRST DISTRICT DELEGATES FOR MONDALE
RD 1, Box 183 — Denton, Maryland 21629

Paid for by
FIRST DISTRICT DELEGATES FOR MONDALE
Jim Vizas, Caroline County, Treasurer
and not authorized by Mondale for President

№ 973

1313

RETURN RECEIPT REQUESTED

CERTIFIED

P 504 211 644

MAIL

Charles N. Steele
General Council
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20436



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

James M. Voss, Treasurer
First District Delegates
For Mondale
RD 1 Box 183
Denton, MD 21629

Re: MUR 1667

Dear Mr. Voss:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

8504050319

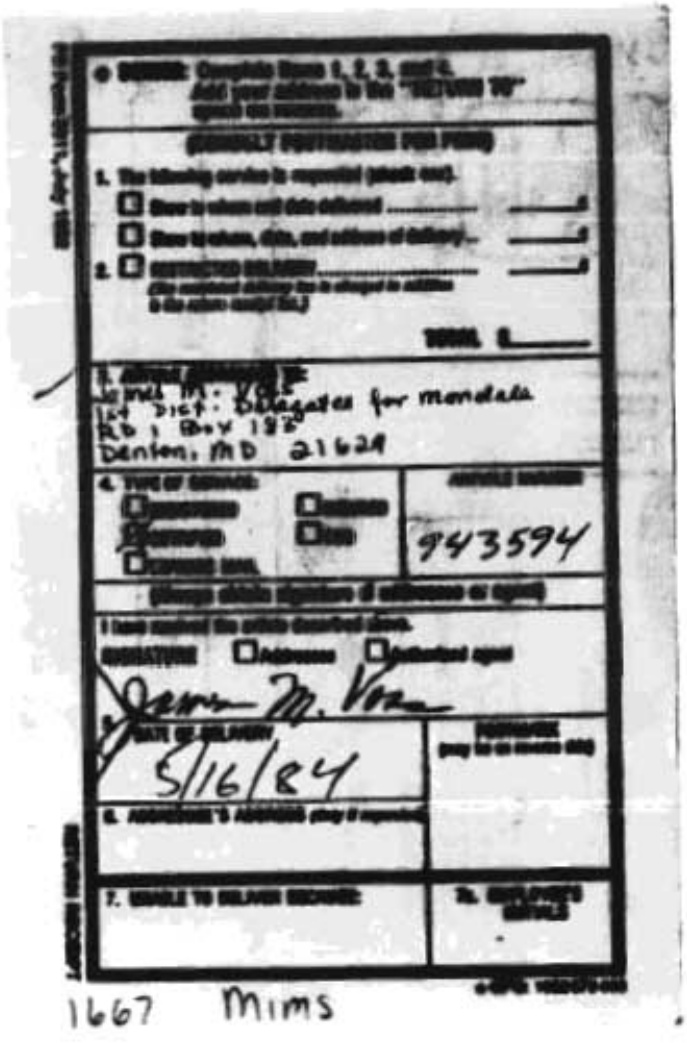
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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



8504050013 20

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1704

NAME OF COUNSEL: Mr. Kerry Harvey

ADDRESS: Brown, Todd Heyburn
111 Upper Street
Lexington, Ky 40507

TELEPHONE: (606) 233-4068

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.

6/12/84
Date

Ralph Coldiron
Signature

RESPONDENT'S NAME: Ralph Coldiron

ADDRESS: 1513 Pinemeadow
Lexington, Ky 40504

HOME PHONE: (606) 233-0187

BUSINESS PHONE: (606) 231-7676

8504050321

RECEIVED BY THE FEC
84 JUN 15 P12:03

Ralph Coldiron, Treasurer
Kentucky At-Large Delegates
For Mondale Committee
1513 Pinemeadow Drive
Lexington, Kentucky 40504

June 8, 1984

84 JUN 15 P1:25

8504013322

CONFIDENTIAL

Federal Election Commission
C/O Charles N. Steele
General Counsel
Washington, D.C. 20463

Re: Kentucky-At-Large Delegates from Mondale Committee and Ralph Coldiron, MUR 1704

Dear Mr. Steele:

On behalf of myself and the Kentucky At-Large Delegates for Mondale Committee, (collectively, the "Kentucky Committee") I write in response to the Complaint filed with the Federal Election Committee ("the Commission") by Americans with Harts, Inc. ("Hart').

The Complaint and the supplemental materials filed by Hart are of such a general nature that it is impossible for the Kentucky Committee to formulate a complete response. In the voluminous materials submitted by Hart, there are only two sentences which refer to Kentucky at all and even in that case there is no specific allegation of wrong-doing.

It is unreasonable to expect the Kentucky Committee to respond to allegations which touch on it only tangentially, if at all. Any such response would be inappropriate as the Kentucky Committee has no direct knowledge of the vast majority of the incidents mentioned in the Complaint. At such time as Hart makes allegations of specific wrong-doing by the Kentucky Committee, it will be in a position to file a meaningful intelligent response.

The great bulk of the materials submitted by Hart make certain allegations against the Mondale for President Committee, Inc. and, in some cases, various delegate committees. The majority of Hart's vague allegations focus on other delegate committees other than Kentucky. The Kentucky Committee has no direct knowledge of the activities of these delegate committees. The Complaint, states no specific allegations of wrong-doing against the Kentucky Committee. Hart should be required to inform the Commission and the Kentucky Committee of its specific complaints. Until such specific allegations are made, the Kentucky Committee cannot fairly respond.

The Kentucky Committee also takes issue with Hart's interpretation of the facts and the law. The Kentucky Committee was, when active, controlled by those slated as Mondale delegates to assist in their selection as delegates to the Democratic National Convention. Contrary to Hart's allegations, such activity contravenes no statute or regulations. The Kentucky Committee believes that 11 C.F.R. 110.1 et, seq, exempts its expenditures for certain volunteer campaign materials. Whether such expenditures are made by delegates individually or as a part of a committee is of no consequence.

Hart also alleges that some or all of the delegate committees are affiliated either with each other, with the Mondale for President Committee, Inc., or both. Hart does not state which, if any, of these various organizations it believes the Kentucky Committee has affiliated. Likewise, Hart alleges no facts which tend to show such an affiliation by the Kentucky Committee. Until presented with reasonably specific allegations, the Kentucky Committee can only deny any such affiliation as alleged by Hart.

The Kentucky Committee also wishes to call to the Commission's attention that it has not, since the Kentucky caucuses, and does not in the future plan to participate in active campaigning. The Kentucky Committee anticipated, prior to the Commission's recent notice, filing its termination report in the next few days. In light of this, the fears raised in the Complaint of continuing or future violations are obviously misdirected if leveled at the Kentucky Committee. Again, this illustrates the shortcomings of the shotgun approach employed by Hart. Since the Kentucky Committee has ceased all but its winding-up activities, it asks the Commission to reconsider whether any further action is necessary or warranted in this matter.

While the Kentucky Committee is willing to cooperate with the Commission in any reasonable manner, it must repeat that there is little it can do by way of response to the vague and general allegations as are now before the Commission. Quite clearly, Hart's Complaint falls far short of the clear and concise statement contemplated by 11 C.F.R. 111.2(b)(2). Since the Complaint is insufficient in this and other respects, the Kentucky Committee asks that no further action be taken.

Very truly yours,

Ralph Coldiron

8504013023

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1704

NAME OF COUNSEL: Ms. Kerry Harvey

ADDRESS: Brown, Todd Heyburn
111 Upper Street
Lexington, Ky 40507

TELEPHONE: (606) 233-4068

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.

6/12/84
Date

Ralph Coldiron
Signature

RESPONDENT'S NAME: Ralph Coldiron

ADDRESS: 1513 Pinemeadow
Lexington, Ky 40504

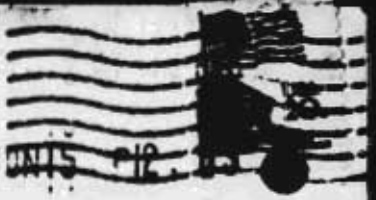
HOME PHONE: (606) 223-0187

BUSINESS PHONE: (606) 231-7676

8504050132 4

oldiron, Treasurer
y At-Large Delegates
ondale Committee
nemeadow Drive
on, Kentucky 40504





Federal Election Commission
C/O Charles N. Steele
General Counsel
Washington, D.C. 20463

8540

RECEIVED AT THE FEC
84 MAY 29 A8:58

MUR 1667
memo

Ralph Coldiron, Treasurer
Kentucky At-Large Delegates
For Mondale Committee
1513 Pinemeadow Drive
Lexington, Kentucky 40504

May 23, 1984

CONFIDENTIAL

Federal Election Commission
c/o Charles N. Steele
General Counsel
Washington, D.C. 20463

84 MAY 29 P10:19

8504050013326

Re: Kentucky-At-Large Delegates for Mondale Committee
and Ralph Coldiron, MUR 1667

Dear Mr. Steele:

On behalf of myself and the Kentucky At-Large Delegates for Mondale Committee, (collectively, the "Kentucky Committee") I write in response to the Complaint filed with the Federal Election Committee ("the Commission") by Americans with Hart, Inc. ("Hart").

The Complaint and the supplemental materials filed by Hart are of such a general nature that it is impossible for the Kentucky Committee to formulate a complete response. In the voluminous materials submitted by Hart, there is only one sentence which refers to Kentucky at all and even in that case there is no specific allegation of wrong-doing.

It is unreasonable to expect the Kentucky Committee to respond to allegations which touch on it only tangentially, if at all. Any such response would be inappropriate as the Kentucky Committee has no direct knowledge of the vast majority of the incidents mentioned in the Complaint. At such time as Hart makes allegations of specific wrong-doing by the Kentucky Committee, it will be in a position to file a meaningful intelligent response.

The great bulk of the materials submitted by Hart make certain allegations against the Mondale for President Committee, Inc. and, in some cases, various delegate committees. The majority of Hart's vague allegations focus on delegate committees in New York and Illinois. The Kentucky Committee has no direct knowledge of the activities of these delegate committees. The Complaint, states no specific allegations of wrong-doing against the Kentucky Committee. Hart should be required to inform the Commission and the Kentucky Committee of its specific complaints. Until such specific allegations are made, the Kentucky Committee cannot fairly respond.

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8504501327

Complaint falls far short of the clear and concise statement contemplated by 11 C.F.R. 111.2(b)(2). Since the Complaint is insufficient in this and other respects, the Kentucky Committee asks that no further action be taken.

Very truly yours,

Ralph Coldiron

8504050013 28

CKY AT-LARE DELEGATES FOR
ALE COMMITTEE
Pinemeadow Drive
gton, Kentucky 40505





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

RECEIVED AT THE FEC

GCC #3186

84 MAY 17 P1:30

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1667

NAME OF COUNSEL: Mr. Kerry Harvey

ADDRESS: Brown, Todd Heyburn
116 North Upper St
Lexington, Ky 40507

TELEPHONE: (606) 233-4068

MUR 1667
Memo

84 MAY 17 P3:04

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.

5/13/84
Date

Ralph Coldiron
Signature

RESPONDENT'S NAME: Ralph Coldiron, Treasurer

ADDRESS: Ky At Large Delegates For Mondale
1513 Ivymeadows Dr
Lexington, Ky 40504

HOME PHONE: (606) 253-0187

BUSINESS PHONE: (606) 231-7671

8504050130

e Ct Party Committee
Pimmeadow Dr
ton, Ky 40504

LEXINGTON, KY
PM
14 MAY
1984

Mr. Charles N. Steele
General Counsel
Federal Election Commission
Washington DC
20463

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Dan Watkins, Treasurer
Kansas Mondale At-Large
Delegate Committee
1645 Barker
Lawrence, KS 66044

Re: MUR 1667

Dear Mr. Watkins:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

9504050132

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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

8504050133

From the desk of

PATRICK C. BRUMLEVE

6-17-84

I have sent a form before but I put the Wrong MUR number on it. Sorry.

Pat Brumleve

From the desk of

PATRICK C. BRUMLEVE

6-17-84

I have sent a form before but I put the Wrong MUR number on it. Sorry.

Pat Brumleve

8504050134

RECEIVED
FEC
84 JUN 25 P1:08

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1704 FEC#C00177840

NAME OF COUNSEL: Michael D. Sher

ADDRESS: Friedman & Koven, Room 900
208 South LaSalle
Chicago, Il 60604

TELEPHONE: 314/269-9605

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.

6-19-84
Date

Patrick C. Brumleve
Signature

RESPONDENT'S NAME: Patrick C. Brumleve

ADDRESS: Box 111, 22nd Congressional District
Delegates for Mondale, Cobden, Il 62920

HOME PHONE: 618/893-2067

BUSINESS PHONE:

8504013035

TRICK BRUMLEVE

Illinois 62920

COBDEN
JUN
19
AM
1984
$2.20

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

CERTIFIED

P 609 264 073

MAIL

MUR 1704 FEC
84 JUN 25 A 8:38

LAW OFFICES
FRIEDMAN & KOVEN
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
208 SOUTH LA SALLE STREET
CHICAGO, ILLINOIS 60604
(312) 346-6800
CABLE ADDRESS "FREEZOR"
TELEX 254083

MICHAEL D. SHER
DIRECT TELEPHONE NUMBER
(312) 269-6605

June 18, 1984

Charles N. Steele, Esq.
General Counsel
Federal Election Commission
1325 K Street, N. W.
Washington, DC 20463

Re: MUR 1704 / Consolidated Response of Mondale Delegate Committees from the Twelfth, Nineteenth and Twenty-Second Districts (Illinois)

Dear Mr. Steele:

I have been designated as counsel for each of the above-referenced Mondale Delegate Committees from the State of Illinois (the "Delegate Committees") in MUR 1704. This letter is submitted to the Federal Election Commission (the "Commission") on behalf of the Delegate Committees in response to the Complaint filed with the Commission by the National Right to Work Committee and Ralph Martin (Bud) Hettinga, Jr. on May 18, 1984 (the "Complaint").

The Complaint does not name or designate any of the Delegate Committees as respondents and, accordingly, the Commission should not consider the Delegate Committees as respondents in this proceeding. Section 111.4 of the Commission's regulations requires that each complaint which is filed with the Commission must "clearly identify as a respondent each person or entity who is alleged to have committed a violation" and must "contain a clear and concise recitation of the facts which describe a violation of a statute or regulation over which the Commission has jurisdiction." 11 C.F.R. § 111.4(d)(1) and (3); see also 2 U.S.C. § 437g(a)(1). Neither the caption nor the content of the Complaint designates any of the Delegate Committees as respondents. Moreover, the Complaint fails to recite any facts which describe a violation by any one or more of the Delegate Committees of any "statute or regulation over which the Commission has jurisdiction." Accordingly, at least insofar as the Complaint may be directed to these Delegate Committees, it fails to meet the clear requirements of Section 111.4(d), is fatally defective, should not be considered by the Commission to be directed to these Delegate Committees or, in the alternative, should be dismissed insofar as the Commission determines that it may be directed to these Delegate Committees.

3504013337

Since the Complaint, on its face, is not directed against the Delegate Committees, no further response is made to the Complaint on behalf of the Delegate Committees at this time. However, the Delegate Committees reserve their right to respond to the substantive claims of the Complaint at such time as such response may be required.

Respectfully submitted,

TWELFTH DISTRICT (ILLINOIS)
MONDALE DELEGATE COMMITTEE

NINETEENTH DISTRICT (ILLINOIS)
DELEGATE COMMITTEE FOR MONDALE

TWENTY-SECOND CONGRESSIONAL
DISTRICT (ILLINOIS) MONDALE
DELEGATES COMMITTEE

BY Michael D. Sher

Michael D. Sher, Counsel for the
Delegate Committees

Friedman & Koven
208 South LaSalle Street
Chicago, IL 60604
(312) 346-8500

MDS:ji

8504301338

Log # 3558

FEC

'84 JUN 11 A8:55

LAW OFFICES

FRIEDMAN & KOVEN

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

208 SOUTH LA SALLE STREET

CHICAGO, ILLINOIS 60604

(312) 346-6300

CABLE ADDRESS "FREEZOR"

TELEX 254083

MICHAEL D. SHER

DIRECT TELEPHONE NUMBER

(312) 269-8405

June 8, 1984

Mr. John D. Gibson
Assistant Staff Director
Reports Analysis Division
Federal Election Commission
1325 K Street, N. W.
Washington, DC 20463

Re: MUR 1667

Dear Mr. Gibson:

I have been designated as counsel for Mondale Delegate Committees from the Third, Fourth, Seventh, Ninth, Eleventh, Twelfth, Fourteenth, Seventeenth, Nineteenth, Twentieth, Twenty-First and Twenty-Second Districts from the State of Illinois (the "Delegate Committees") in the above-referenced proceeding before the Federal Election Commission (the "Commission"). The treasurers of certain of the Delegate Committees have received letters from you, all dated May 16, 1984, which advise the Delegate Committees that in view of the above-referenced proceeding before the Commission, "the Federal Election Commission cannot approve any requests for termination from your committee, at this time." Your letter further reminds the committees "that until termination is authorized, your reporting requirements under 2 U.S.C. § 434 continue."

On behalf of the Delegate Committees, I respectfully suggest that neither Section 434, Section 433(d) nor 11 C.F.R. § 102.3 supports your contention that continued reporting is required by the Delegate Committees until such time as the Commission approves requests for termination. I am unaware of any authority which supports the Commission's apparent position that its authorization is necessary for the termination of a political committee, where that committee "no longer receive[s] any contributions or make[s] any disbursements that would otherwise qualify it as a political committee" and where that committee "has no outstanding debts and obligations." 11 C.F.R. § 102.3(a). Therefore, there appears to be no legal basis for your assertion that the Delegate Committees, which no longer conduct any activities, are required to report to the Commission pursuant to Section 434 until such time as their termination is "approved" by the Commission.

Accordingly, until such time as the Commission explains by what authority it can continue to compel inactive political committees to file reports pursuant to Section 434, the Delegate Committees presently intend to file the appropriate termination reports on the appropriate FEC Forms in accordance with 11 C.F.R. § 102.3, or have already done

8504051339

so in certain instances. Based upon the express provisions of Sections 433(d) and 434 of Title 2, and 11 C.F.R. § 102.3 promulgated pursuant thereto, the Delegate Committees respectfully submit that they are not required, nor do they presently intend, to file any additional quarterly reports with the Commission, as such is not required by any of the aforesaid provisions. Please advise me of the Commission's position regarding this matter and whether it has or will reconsider the position expressed in your letter of May 16. Thank you.

Very truly yours,

Michael D. Sher

Michael D. Sher

MDS:ji

cc: Charles N. Steele, Esq.

8504050134 0

From the desk of

PATRICK C. BRUMLEVE

6-7-84

This is the second statement of Designation of Counsel that I have sent to the FEC.

I sent the first one on May 21, 1984.

Pat Brumleve

85040501341

Gen 3553

RECEIVED AT THE FEC

84 JUN 11 A8:07

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1667 FEC#C00177840

NAME OF COUNSEL: Michael D. Sher

ADDRESS: Friedman & Koven, Room 900
208 South LaSalle
Chicago, Il 60604

TELEPHONE: 314/269-9605

84 JUN 11 A10:27

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.

6-7-84
Date

Patrick C. Brumleve
Signature

RESPONDENT'S NAME: Patrick C. Brumleve

ADDRESS: 22nd Congressional District
Delegates for Mondale
Box 111, Cobden, Il 62920

HOME PHONE: 618/893-2067

BUSINESS PHONE:

8503405013342

RICK BRUMLEVE
Illinois 62920

85 0 0 0 1 3 1 3

84 JUN 11 A9:07

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

RECEIVED BY FEC
84 MAY 24 AM 11:02

Ga#3299

LAW OFFICES

FRIEDMAN & KOVEN

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

208 SOUTH LA SALLE STREET
CHICAGO, ILLINOIS 60604

(312) 348-6500
CABLE ADDRESS "FREEZOR"
TELEX 254083

22nd & West

MICHAEL D. SHER
DIRECT TELEPHONE NUMBER
(312) 922-6666

May 22, 1985

84 MAY 24 AM 11:44

Charles N. Steele, Esq.
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, DC 20463

Re: MUR 1667

Dear Mr. Steele:

Enclosed are the Statements of Designation of Counsel of the 14th District (Illinois) Delegate Committee for Mondale and the 22nd Congressional District (Illinois) Delegates for Mondale which designate me as counsel for those Delegate Committees in the above-referenced proceeding. I will file responses on behalf of those Delegate Committees with the Commission in accordance with the Federal Election Campaign Act.

As discussed today with Mr. Stephen Mims of your office, Mr. Patrick Brumleve, Treasurer of the 22nd District Committee, did not receive the papers transmitted with the Commission's letter of May 4, 1984 until May 14, 1984. Accordingly, the response of the 22nd District Committee will be filed within 15 days of May 14.

Very truly yours,

Michael D. Sher

Michael D. Sher

MDS:ji

Enclosures

cc: Mr. Jerome C. Shapiro
Mr. Patrick C. Brumleve

8504050134

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1667 FEC#C00177840

NAME OF COUNSEL: Michael D. Sher

ADDRESS: Friedman & Koven, Room 900
208 South LaSalle
Chicago, Il 60604

TELEPHONE: 312/269-9605

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.

5-21-84
Date

Patrick C. Brumleve
Signature

RESPONDENT'S NAME: Patrick C. Brumleve

ADDRESS: Box 111, 22nd Congressional District
Delegates for Mondale, Cobden, Il 62920

HOME PHONE: 618/893-2067

BUSINESS PHONE:

8504013450

RECEIVED AT THE FEC
Oct. 5293
84 MAY 24 AM : 30

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1667 FEC#C00177840

NAME OF COUNSEL: Michael D. Sher

ADDRESS: Friedman & Koven, Room 900 Mims
208 South LaSalle
Chicago, Il 60604

TELEPHONE: 314/269-9605

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.

5-21-84
Date

Patrick C. Brumleve
Signature

RESPONDENT'S NAME: Patrick C. Brumleve

ADDRESS: Box 111, 22nd Congressional District
Delegates for Mondale, Cobden, Il 62920

HOME PHONE: 618/893-2067

BUSINESS PHONE:

8504050134 6

Pinckneyville
Illinois, IL 62920

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84 MAR 24 AM 9:39

Federal Election Comm
1325 K Street, N.W.
Washington, DC 20463

CERTIFIED
P 650 002 635
MAIL

Attn: Stephen Mims

ANDREW KLEAMENAKIS
CAROLYN KLEAMENAKIS
90 BALMORAL PH. 312-446-5380
NORTHFIELD, ILL. 60093

501

5-15 1984

70-827/719

PAY TO THE ORDER OF 18th Dist. Mondale Delegate Committee 20 02

Two Hundred & [redacted] DOLLARS

Bank of Northfield
Northfield, Illinois 60093

FOR DONATION

Carolyn Kleamenakis

:071909279: "01-21436" 0501

950405013 48

EXHIBIT D

PETER D. FISCHER
1825 N. LINCOLN PLAZA, APT. 2100
CHICAGO, ILL. 60614

677

April 13 19 84

Pay to the order of 10th District Meredith Delyea Comm. $ 100.00

One hundred and 00/100 Dollars

FIRST CHICAGO The First Banking Center

Peter Fischer

⑆071000013⑆ 68 69513⑈ 0677

BARBARA ANKLEY 7-82
ROGER ANKLEY
2545 EVERGREEN
WAUKEGAN, ILL. 60085

683

4-16 19 84 71-183/719

PAY TO THE ORDER OF 10th DISTRICT Meredith Delyea Comm. 100.00

One Hundred & no/100 DOLLARS

Citizens Bank

Roger K Ankley

⑆071901604⑆ 578495600⑈ 0683

3504005013349

NUMBER
352

ALMA CRAMER LIVERMORE
LEONE J. KREMBS

March 9 19 84

70-118
719

PAY TO THE ORDER OF 10th District Mondale Delegate Committee $ 50 00

Fifty and 00/100 DOLLARS

The Evanston Bank
Member FDIC
Main Street at Chicago Avenue, Evanston, IL 60202

MEMO Contribution

Alma Cramer Livermore

⑆071901154⑆ 31736600⑈

3504050132

EUGENE RAWHOOF
SPECIAL ACCOUNT
2814 EDINA BLVD.
ZION, ILL. 60099

3921

3/11 1987

PAY TO THE ORDER OF Otto Pfaff, Honorable Deb. Evans $100.00

One hundred 00/100 DOLLARS

BANK of WAUKEGAN
WAUKEGAN, ILLINOIS

Eugene Rawhoof

⑆071923378⑆ ⑈015 5666 1⑈ 3921

350405013351

003 2-77 710

American National Bank
and Trust Company of Chicago • Chicago, Illinois 60690

DATE 2-24 1984

PAY TO THE ORDER OF 10th C.D. Delegates For Mondale $250.00

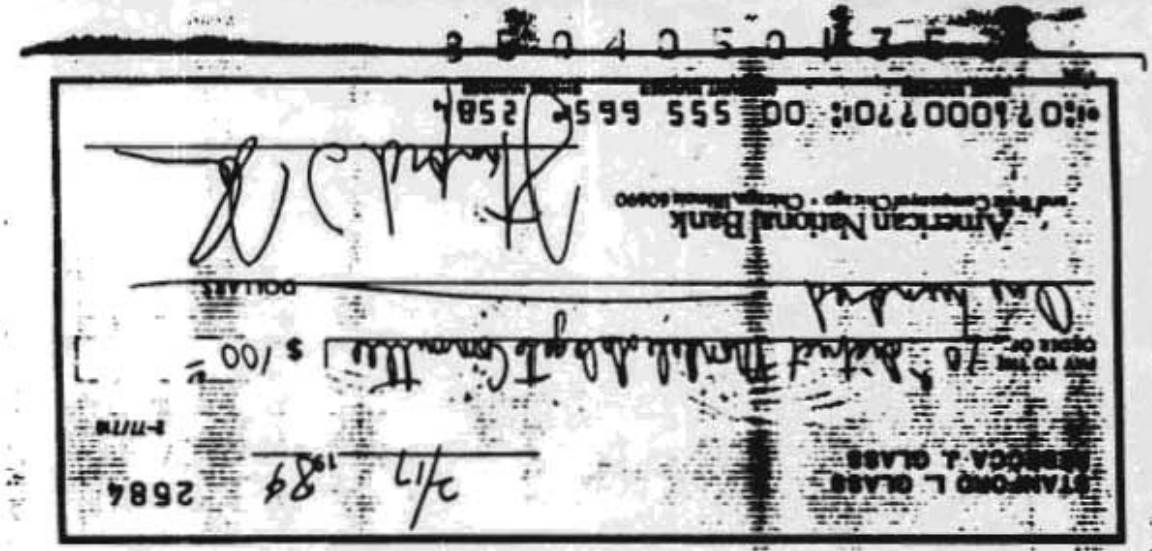
Two hundred fifty and no/00 DOLLARS

7th C.D. Delegates for mondale
180 W. Wacker Suite 4700
Chicago, 60611

W. Taylor
Treasurer

⑆071000770⑆ 006644216

3504013252



HOLLEB & COFF, LTD.
ATTORNEYS AT LAW
ONE IBM PLAZA
SUITE 4040
CHICAGO, ILLINOIS 60611

CHICAGO
FEB 18 '94
POSTAGE
$.29

Elliott Hartstein
Cohen
208 S. LaSalle - #1860
Chicago 60604

EUGENIA S. CHAPMAN
16 S. PRINCETON CT.
ARLINGTON HEIGHTS, ILL. 60005

163

Feb 13 19 84

70-2148/719

PAY TO THE ORDER OF 10th Dist Model Delegate Leg Comm $ 750 00

Seven Hundred Fifty 00/100 DOLLARS

American National Bank of Arlington Heights

For Loan

Eugenia S Chapman

⑆071921480⑆ ⑈0118560 2⑈03 0163

DANIEL M. PIERCE
ONE IBM PLAZA, RM. 3700
CHICAGO, ILL. 60611

737

Dec 10, 19 84

2-1/710

PAY TO THE ORDER OF 10th District Model Delegate Comm $ 500.00

Five Hundred and no /100 DOLLARS

FIRST CHICAGO
The First National Bank of Chicago
Chicago, Illinois 60670

FOR

Daniel M. Pierce

⑈000737⑈ ⑆071000013⑆ 65 44304⑈

3504050135 4

ELLIOTT HARTSTEIN
JUDY HARTSTEIN
[redacted] PROVIDENCE LANE 312/634-8665
BUFFALO GROVE, ILL. [redacted]

4441

1-24 19 84 3-3/710

PAY TO THE ORDER OF [redacted] $ 10.00

[redacted] DOLLARS

CONTINENTAL BA[redacted]

FOR _____ Elliott Hartstein

⑆071000391⑆ 83-31782⑈ 4441 ⑈000001000⑈

9504050135

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84 JUL 17 A8:25

GCC #4053

LAW OFFICES

FRIEDMAN & KOVEN

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

208 SOUTH LA SALLE STREET

CHICAGO, ILLINOIS 60604

(312) 346-8500

CABLE ADDRESS "FREEZON"

TELEX 254083

MICHAEL D. SHER

DIRECT TELEPHONE NUMBER:

(312) 269-9608

July 13, 1984

Stephen Mims, Esq.
Federal Election Commission
1325 K Street, N. W.
Washington, DC 20463

Re: MUR 1667 / MUR 1704

Dear Mr. Mims:

As you requested during our telephone conversation of June 29, this will advise you that the 21st District Delegate Committee has not received nor expended any funds since May 7, 1984, the last day of the reporting period covered by the Termination Report filed by that Committee with the Commission in May, 1984. This will further advise you that as of July 1, 1984, the 21st District Delegate Committee had no funds in its accounts.

This information is being voluntarily provided to the Commission by the Committee and is provided without prejudice to any and all rights which that Committee has or may have. This will also reaffirm the position previously expressed in my letters to the Commission dated June 8 and June 27, 1984. To date, I have not received a response to either of those letters.

Very truly yours,

Michael D. Sher

MDS:ji

cc: Ms. Betty Donovan

3504013556

OMAN & KOVEN
SOUTH LA SALLE STREET
AGO, ILLINOIS 60604

84 JUL 17 A8:25

Stephen Mims, Esq.
Federal Election Commission
1325 K Street, N. W.
Washington, DC 20463

(c.a. # 3558
FEC

14 JUN 11 A8:55

LAW OFFICES
FRIEDMAN & KOVEN
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
208 SOUTH LA SALLE STREET
CHICAGO, ILLINOIS 60604
(312) 346-6500
CABLE ADDRESS "FREEZOR"
TELEX 254083

MICHAEL D. SHER
DIRECT TELEPHONE NUMBER
(312) 269-6608

June 8, 1984

Mr. John D. Gibson
Assistant Staff Director
Reports Analysis Division
Federal Election Commission
1325 K Street, N. W.
Washington, DC 20463

Re: MUR 1667

Dear Mr. Gibson:

I have been designated as counsel for Mondale Delegate Committees from the Third, Fourth, Seventh, Ninth, Eleventh, Twelfth, Fourteenth, Seventeenth, Nineteenth, Twentieth, Twenty-First and Twenty-Second Districts from the State of Illinois (the "Delegate Committees") in the above-referenced proceeding before the Federal Election Commission (the "Commission"). The treasurers of certain of the Delegate Committees have received letters from you, all dated May 16, 1984, which advise the Delegate Committees that in view of the above-referenced proceeding before the Commission, "the Federal Election Commission cannot approve any requests for termination from your committee, at this time." Your letter further reminds the committees "that until termination is authorized, your reporting requirements under 2 U.S.C. § 434 continue."

On behalf of the Delegate Committees, I respectfully suggest that neither Section 434, Section 433(d) nor 11 C.F.R. § 102.3 supports your contention that continued reporting is required by the Delegate Committees until such time as the Commission approves requests for termination. I am unaware of any authority which supports the Commission's apparent position that its authorization is necessary for the termination of a political committee, where that committee "no longer receive[s] any contributions or make[s] any disbursements that would otherwise qualify it as a political committee" and where that committee "has no outstanding debts and obligations." 11 C.F.R. § 102.3(a). Therefore, there appears to be no legal basis for your assertion that the Delegate Committees, which no longer conduct any activities, are required to report to the Commission pursuant to Section 434 until such time as their termination is "approved" by the Commission.

Accordingly, until such time as the Commission explains by what authority it can continue to compel inactive political committees to file reports pursuant to Section 434, the Delegate Committees presently intend to file the appropriate termination reports on the appropriate FEC Forms in accordance with 11 C.F.R. § 102.3, or have already done

8504013558

so in certain instances. Based upon the express provisions of Sections 433(d) and 434 of Title 2, and 11 C.F.R. § 102.3 promulgated pursuant thereto, the Delegate Committees respectfully submit that they are not required, nor do they presently intend, to file any additional quarterly reports with the Commission, as such is not required by any of the aforesaid provisions. Please advise me of the Commission's position regarding this matter and whether it has or will reconsider the position expressed in your letter of May 16. Thank you.

Very truly yours,

Michael D. Sher

MDS:ji

cc: Charles N. Steele, Esq.

3504013359

THE FEC
84 JUL 17 A8:25
GCC #4053

LAW OFFICES
FRIEDMAN & KOVEN
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
208 SOUTH LA SALLE STREET
CHICAGO, ILLINOIS 60604
(312) 346-6500
CABLE ADDRESS "FREEZOR"
TELEX 254083

MICHAEL D. SHER
DIRECT TELEPHONE NUMBER:
(312) 269-0000

July 13, 1984

Stephen Mims, Esq.
Federal Election Commission
1325 K Street, N. W.
Washington, DC 20463

Re: MUR 1667 / MUR 1704

Dear Mr. Mims:

As you requested during our telephone conversation of June 29, this will advise you that the 21st District Delegate Committee has not received nor expended any funds since May 7, 1984, the last day of the reporting period covered by the Termination Report filed by that Committee with the Commission in May, 1984. This will further advise you that as of July 1, 1984, the 21st District Delegate Committee had no funds in its accounts.

This information is being voluntarily provided to the Commission by the Committee and is provided without prejudice to any and all rights which that Committee has or may have. This will also reaffirm the position previously expressed in my letters to the Commission dated June 8 and June 27, 1984. To date, I have not received a response to either of those letters.

Very truly yours,

Michael D. Sher

MDS:ji

cc: Ms. Betty Donovan

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LAW OFFICES
FRIEDMAN & KOVEN
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
208 SOUTH LA SALLE STREET
CHICAGO, ILLINOIS 60604
(312) 346-6500
CABLE ADDRESS "FREEZOR"
TELEX 254083

MICHAEL D. SHER
DIRECT TELEPHONE NUMBER:
(312) 360-6000

2:15 PM 1:20

June 14, 1984

FEDERAL EXPRESS

Charles N. Steele, Esq.
General Counsel
Federal Election Commission
1325 K Street, N. W.
Washington, DC 20463

Re: MUR 1704 / Consolidated Response of Mondale Delegate Committees from the Third, Fourth, Seventh, Ninth, Eleventh, Fourteenth, Seventeenth, Twentieth and Twenty-First Districts (Illinois)

Dear Mr. Steele:

Enclosed are the Statements of Designation of Counsel which designate me as counsel for each of the above-referenced Mondale Delegate Committees from the State of Illinois (the "Delegate Committees") in MUR 1704. This letter is submitted to the Federal Election Commission (the "Commission") on behalf of the Delegate Committees in response to the Complaint filed with the Commission by the National Right to Work Committee and Ralph Martin (Bud) Hettinga, Jr. on May 18, 1984 (the "Complaint").

The Complaint does not name or designate any of the Delegate Committees as respondents and, accordingly, the Commission should not consider the Delegate Committees as respondents in this proceeding. Section 111.4 of the Commission's regulations requires that each complaint which is filed with the Commission must "clearly identify as a respondent each person or entity who is alleged to have committed a violation" and must "contain a clear and concise recitation of the facts which describe a violation of a statute or regulation over which the Commission has jurisdiction." 11 C.F.R. § 111.4(d)(1) and (3); see also 2 U.S.C. § 437g(a)(1). Neither the caption nor the content of the Complaint designates any of the Delegate Committees as respondents. Moreover, the Complaint fails to recite any facts which describe a violation by any one or more of the Delegate Committees of any "statute or regulation over which the Commission has jurisdiction." Accordingly, at least insofar as the Complaint may be directed to these Delegate Committees, it fails to meet the clear requirements of Section 111.4(d), is fatally defective, should not be considered by the Commission to be directed to these Delegate Committees or, in the alternative, should be dismissed insofar as the Commission determines that it may be directed to these Delegate Committees.

3504013562

Since the Complaint, on its face, is not directed against the Delegate Committees, no further response is made to the Compiaint on behalf of the Delegate Committees at this time. However, the Delegate Committees reserve their right to respond to the substantive claims of the Complaint at such time as such response may be required.

Respectfully submitted,

THIRD CONGRESSIONAL DISTRICT (ILLINOIS) DELEGATES FOR MONDALE

FOURTH DISTRICT (ILLINOIS) MONDALE DELEGATE COMMITTEE

COMMITTEE CONGRESSIONAL DISTRICT (ILLINOIS) DELEGATES FOR MONDALE

NINTH DISTRICT (ILLINOIS) MONDALE DELEGATE COMMITTEE

ELEVENTH DISTRICT (ILLINOIS) MONDALE DELEGATE COMMITTEE

FOURTEENTH DISTRICT (ILLINOIS) DELEGATE COMMITTEE FOR MONDALE

SEVENTEENTH DISTRICT (ILLINOIS) MONDALE DELEGATE COMMITTEE

TWENTIETH CONGRESSIONAL DISTRICT (ILLINOIS) DELEGATES FOR MONDALE

TWENTY-FIRST CONGRESSIONAL DISTRICT (ILLINOIS) MONDALE DELEGATES COMMITTEE

BY Michael D. Sher

Michael D. Sher, Counsel for the Delegate Committees

Friedman & Koven
208 South LaSalle Street
Chicago, IL 60604
(312) 346-6500

MDS:ji

8504050136 3

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1704

NAME OF COUNSEL: MICHAEL D. SHER

ADDRESS: FRIEDMAN & KOVEN
208 South LaSalle Street
Chicago, IL 60604

TELEPHONE: 312/346-8500

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.

6/12/84
Date

21st Congressional District Mondale Delegates Committee
Betty Donovan
Signature

RESPONDENT'S NAME: 21st Congressional District Mondale Delegates Committee
Betty Donovan, Treasurer

ADDRESS: 8a Potomac Drive
Fairview Heights, IL 62208

HOME PHONE: 618/398-1955

BUSINESS PHONE: 618/277-3505 ext. 24

9504005013641

RECEIVED AT THE FEC
HAND DELIVERED
84 JUN 4 PM 1:08

LAW OFFICES
FRIEDMAN & KOVEN
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
208 SOUTH LA SALLE STREET
CHICAGO, ILLINOIS 60604
(312) 346-6300
CABLE ADDRESS "FREEZOR"
TELEX 254083

MICHAEL D. SHER
DIRECT TELEPHONE NUMBER
(312) 922-9000

June 1, 1984

FEDERAL EXPRESS

Charles N. Steele, Esq.
General Counsel
Federal Election Commission
1325 K Street, N. W.
Washington, DC 20463

Re: MUR 1667 / Response of Delegates for Mondale Committee - Twenty-First Congressional District (Illinois) and Eleventh District (Illinois) Mondale Delegate Committee

Dear Mr. Steele:

This letter is submitted to the Federal Election Commission (the "Commission") on behalf of the above-referenced Mondale Delegate Committees from the State of Illinois (the "Respondent Committees" or the "Committees") in response to the Complaint and supplemental submissions filed with the Commission by Americans With Hart, Inc. ("Complainant"). As and for their response to the Complaint and supplemental submissions, the Respondent Committees adopt and incorporate by reference herein the Consolidated Response of Mondale Delegate Committees from the Third, Seventh, Ninth, Fourteenth, Seventeenth, Twentieth and Twenty-Second Districts (Illinois), dated May 25, 1984, which has been filed previously with the Commission in MUR 1667.

Further responding to the Complaint, the Respondent Committees direct the Commission's attention to 2 U.S.C. § 437g(a)(1) and 11 C.F.R. § 111.4 promulgated thereunder, which set forth the required contents of any complaint filed with the Commission, which requirements must be met before the Commission may take any action on such complaint. Measured against those clearly articulated requirements, the Complaint filed in this proceeding is insufficient insofar as the Commission believes it to be directed against the Respondent Committees, and other unidentified delegate committees, which are not specifically named or identified in the Complaint. The Complaint does not "clearly identify as a respondent" either of the Respondent Committees nor does the Complaint contain the requisite allegations of fact with respect to the Respondent Committees. 11 C.F.R. § 111.4(d)(1) and (2). Accordingly, the Commission should enter an order dismissing the Complaint against the Respondent Committees based upon the Complaint's failure to meet the clear requirements of Section 111.4.

Additionally, the Commission should conclude that the Respondent Committees are not "affiliated" committees and that their expenditures were proper and not in any

way allocable to Mondale For President, Inc. for the reasons set forth in the aforementioned Consolidated Response dated May 25, 1984. Therefore, the Commission should dismiss the Complaint against the Respondent Committees for the additional reasons set forth in the aforesaid Consolidated Response.

Respectfully submitted,

DELEGATES FOR MONDALE
COMMITTEE - TWENTY-FIRST
CONGRESSIONAL DISTRICT (ILLINOIS)

ELEVENTH DISTRICT (ILLINOIS)
MONDALE DELEGATE COMMITTEE

By Michael D. Sher
Michael D. Sher, Counsel for
Respondent Committees

Friedman & Koven
208 South LaSalle Street
Chicago, IL 60604
312/346-8500

MDS:jl

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LAW OFFICES
FRIEDMAN & KOVEN
A PARTNERSHIP OF INCORPORATED PROFESSIONAL CORPORATIONS
208 SOUTH LA SALLE STREET
CHICAGO, ILLINOIS 60604
(312) 346-6500
CABLE ADDRESS "FREEZOR"
TELEX 254083

MICHAEL D. SHER
DIRECT TELEPHONE NUMBER:
(312) 922-9605

21st Dist

MUR 1667
Memo

June 1, 1984

FEDERAL EXPRESS

Charles N. Steele, Esq.
General Counsel
Federal Election Commission
1325 K Street, N. W.
Washington, DC 20463

Re: MUR 1667 / Delegates for Mondale Committee
- Twenty-First Congressional District (Illinois) and
Eleventh District (Illinois) Mondale Delegate Committee

Dear Mr. Steele:

Enclosed are the Statements of Designation of Counsel submitted by the Delegates for Mondale - Twenty-First Congressional District (Illinois) and Eleventh District (Illinois) Mondale Delegate Committee which designate me as counsel for said delegate committees in the above-referenced proceeding. By letter of even date herewith, I have responded to the Complaint filed in this proceeding on behalf of those delegate committees.

Very truly yours,

Michael D. Sher

Michael D. Sher

MDS:ji

Enclosures

3504013567

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1667

NAME OF COUNSEL: Mike Sher,Atty

ADDRESS: 208 South LaSalle
Chicago,Illinois 60604

TELEPHONE: 312-269-9605

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.

June 1, 1984
Date

Betty Donovan, Treasurer.
Signature

RESPONDENT'S NAME: Delegates For Mondale-21st District
Betty Donovan,Treasurer

ADDRESS: 8a Potomac Drive
Fairview Heights,Ill 62208

HOME PHONE: 618-398-1955

BUSINESS PHONE: 618-277-3505 - Ex 24

9504031363

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Betty Donovan, Treasurer
Delegates For Modale Committee
21st Congressional District
8A Potomac Drive
Fairview Heights, IL 62208

Re: MUR 1667

Dear Ms. Donovan:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

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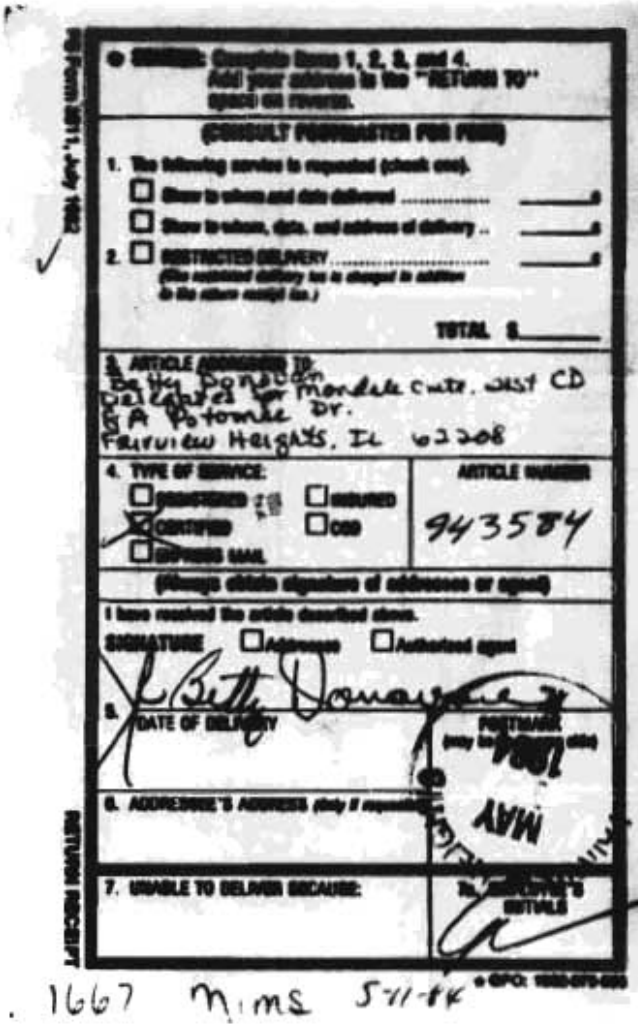
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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



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LAW OFFICES
FRIEDMAN & KOVEN
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
208 SOUTH LA SALLE STREET
CHICAGO, ILLINOIS 60604
(312) 346-6300
CABLE ADDRESS "FREEZON"
TELEX 254083

MICHAEL D. SHER
DIRECT TELEPHONE NUMBER:
(312) 269-0269

30th Dist.

15 PM 1:20

June 14, 1984

FEDERAL EXPRESS

Charles N. Steele, Esq.
General Counsel
Federal Election Commission
1325 K Street, N. W.
Washington, DC 20463

Re: MUR 1704 / Consolidated Response of Mondale Delegate Committees from the Third, Fourth, Seventh, Ninth, Eleventh, Fourteenth, Seventeenth, Twentieth and Twenty-First Districts (Illinois)

Dear Mr. Steele:

Enclosed are the Statements of Designation of Counsel which designate me as counsel for each of the above-referenced Mondale Delegate Committees from the State of Illinois (the "Delegate Committees") in MUR 1704. This letter is submitted to the Federal Election Commission (the "Commission") on behalf of the Delegate Committees in response to the Complaint filed with the Commission by the National Right to Work Committee and Ralph Martin (Bud) Hettinga, Jr. on May 18, 1984 (the "Complaint").

The Complaint does not name or designate any of the Delegate Committees as respondents and, accordingly, the Commission should not consider the Delegate Committees as respondents in this proceeding. Section 111.4 of the Commission's regulations requires that each complaint which is filed with the Commission must "clearly identify as a respondent each person or entity who is alleged to have committed a violation" and must "contain a clear and concise recitation of the facts which describe a violation of a statute or regulation over which the Commission has jurisdiction." 11 C.F.R. § 111.4(d)(1) and (3); see also 2 U.S.C. § 437g(a)(1). Neither the caption nor the content of the Complaint designates any of the Delegate Committees as respondents. Moreover, the Complaint fails to recite any facts which describe a violation by any one or more of the Delegate Committees of any "statute or regulation over which the Commission has jurisdiction." Accordingly, at least insofar as the Complaint may be directed to these Delegate Committees, it fails to meet the clear requirements of Section 111.4(d), is fatally defective, should not be considered by the Commission to be directed to these Delegate Committees or, in the alternative, should be dismissed insofar as the Commission determines that it may be directed to these Delegate Committees.

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Since the Complaint, on its face, is not directed against the Delegate Committees, no further response is made to the Complaint on behalf of the Delegate Committees at this time. However, the Delegate Committees reserve their right to respond to the substantive claims of the Complaint at such time as such response may be required.

Respectfully submitted,

THIRD CONGRESSIONAL DISTRICT (ILLINOIS) DELEGATES FOR MONDALE

FOURTH DISTRICT (ILLINOIS) MONDALE DELEGATE COMMITTEE

COMMITTEE CONGRESSIONAL DISTRICT (ILLINOIS) DELEGATES FOR MONDALE

NINTH DISTRICT (ILLINOIS) MONDALE DELEGATE COMMITTEE

ELEVENTH DISTRICT (ILLINOIS) MONDALE DELEGATE COMMITTEE

FOURTEENTH DISTRICT (ILLINOIS) DELEGATE COMMITTEE FOR MONDALE

SEVENTEENTH DISTRICT (ILLINOIS) MONDALE DELEGATE COMMITTEE

TWENTIETH CONGRESSIONAL DISTRICT (ILLINOIS) DELEGATES FOR MONDALE

TWENTY-FIRST CONGRESSIONAL DISTRICT (ILLINOIS) MONDALE DELEGATES COMMITTEE

BY Michael D. Sher

Michael D. Sher, Counsel for the Delegate Committees

Friedman & Koven
208 South LaSalle Street
Chicago, IL 60604
(312) 346-8500

MDS:ji

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LAW OFFICES
FRIEDMAN & KOVEN
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
208 SOUTH LA SALLE STREET
CHICAGO, ILLINOIS 60604
(312) 346-6500
CABLE ADDRESS "FREEZON"
TELEX 254083

MICHAEL D. SHER
DIRECT TELEPHONE NUMBER
(312) 360-6505

June 8, 1984

Mr. John D. Gibson
Assistant Staff Director
Reports Analysis Division
Federal Election Commission
1325 K Street, N. W.
Washington, DC 20463

Re: MUR 1667

Dear Mr. Gibson:

I have been designated as counsel for Mondale Delegate Committees from the Third, Fourth, Seventh, Ninth, Eleventh, Twelfth, Fourteenth, Seventeenth, Nineteenth, Twentieth, Twenty-First and Twenty-Second Districts from the State of Illinois (the "Delegate Committees") in the above-referenced proceeding before the Federal Election Commission (the "Commission"). The treasurers of certain of the Delegate Committees have received letters from you, all dated May 16, 1984, which advise the Delegate Committees that in view of the above-referenced proceeding before the Commission, "the Federal Election Commission cannot approve any requests for termination from your committee, at this time." Your letter further reminds the committees "that until termination is authorized, your reporting requirements under 2 U.S.C. § 434 continue."

On behalf of the Delegate Committees, I respectfully suggest that neither Section 434, Section 433(d) nor 11 C.F.R. § 102.3 supports your contention that continued reporting is required by the Delegate Committees until such time as the Commission approves requests for termination. I am unaware of any authority which supports the Commission's apparent position that its authorization is necessary for the termination of a political committee, where that committee "no longer receive[s] any contributions or make[s] any disbursements that would otherwise qualify it as a political committee" and where that committee "has no outstanding debts and obligations." 11 C.F.R. § 102.3(a). Therefore, there appears to be no legal basis for your assertion that the Delegate Committees, which no longer conduct any activities, are required to report to the Commission pursuant to Section 434 until such time as their termination is "approved" by the Commission.

Accordingly, until such time as the Commission explains by what authority it can continue to compel inactive political committees to file reports pursuant to Section 434, the Delegate Committees presently intend to file the appropriate termination reports on the appropriate FEC Forms in accordance with 11 C.F.R. § 102.3, or have already done

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so in certain instances. Based upon the express provisions of Sections 433(d) and 434 of Title 2, and 11 C.F.R. § 102.3 promulgated pursuant thereto, the Delegate Committees respectfully submit that they are not required, nor do they presently intend, to file any additional quarterly reports with the Commission, as such is not required by any of the aforesaid provisions. Please advise me of the Commission's position regarding this matter and whether it has or will reconsider the position expressed in your letter of May 16. Thank you.

Very truly yours,

Michael D. Sher

Michael D. Sher

MDS:ji

cc: Charles N. Steele, Esq.

3504001374

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1704

NAME OF COUNSEL: MICHAEL D. SHER

ADDRESS: FREIDMAN & KOVEN
208 S. LA SALLE ST
CHICAGO, IL 60604

TELEPHONE: (312) 269-9605

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.

JUNE 6, 1984
Date

William H. Dempsey
Signature

Twentieth Congressional District Delegates for Mondale

RESPONDENT'S NAME: WILLIAM H. DEMPSEY

ADDRESS: P.O. BOX 23
FORSYTH, IL 62535

HOME PHONE: 217- 875-0965

BUSINESS PHONE: 217- 877-5681

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JUN - 7 1984
MICHAEL D. SHER

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LAW OFFICES

FRIEDMAN & KOVEN

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

208 SOUTH LA SALLE STREET

CHICAGO, ILLINOIS 60604

(312) 346-6500

CABLE ADDRESS "FREEZOR"

TELEX 254083

MICHAEL D. SHER

DIRECT TELEPHONE NUMBER

(312) 368-6605

20th Dist

May 21, 1985

MUR 1667

Charles N. Steele, Esq.
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, DC 20463

Re: MUR 1667

Dear Mr. Steele:

Enclosed are the Statements of Designation of Counsel of the Seventh Congressional District (Illinois) Delegates for Mondale, the Seventeenth District (Illinois) Mondale Delegate Committee and the Twentieth Congressional District (Illinois) Delegates for Mondale which designate me as counsel for those Delegate Committees in the above-referenced proceeding. I will file responses on behalf of those Delegate Committees with the Commission in accordance with the Federal Election Campaign Act.

Very truly yours,

Michael D. Sher

Michael D. Sher

MDS:ji

Enclosures

cc: William H. Taylor, Esq.
Mr. Bill Dempsey
Ms. Donna M. McWilliams

3504013776

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1667

NAME OF COUNSEL: MICHAEL SHER

ADDRESS: FRIDMAN & KOVEN
900
208 S. LA SALLE
CHICAGO, IL 60604

TELEPHONE: (312) 269-9605

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.

6-17-84
Date

Bill Dempsey
Signature

RESPONDENT'S NAME: 20TH C D DELEGATES FOR MONADLE

ADDRESS: BILL DEMPSEY, TREASURER
P.O. BOX 23
FORSYTH, IL 62535

HOME PHONE: (217) 877-0965

BUSINESS PHONE: (217) 877-5681

3504001377

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Bill Dempsey, Treasurer
20th C D Delegates For Mondale
P.O. Box 23
Forsyth, IL 62535

Re: MUR 1667

Dear Mr. Dempsey:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

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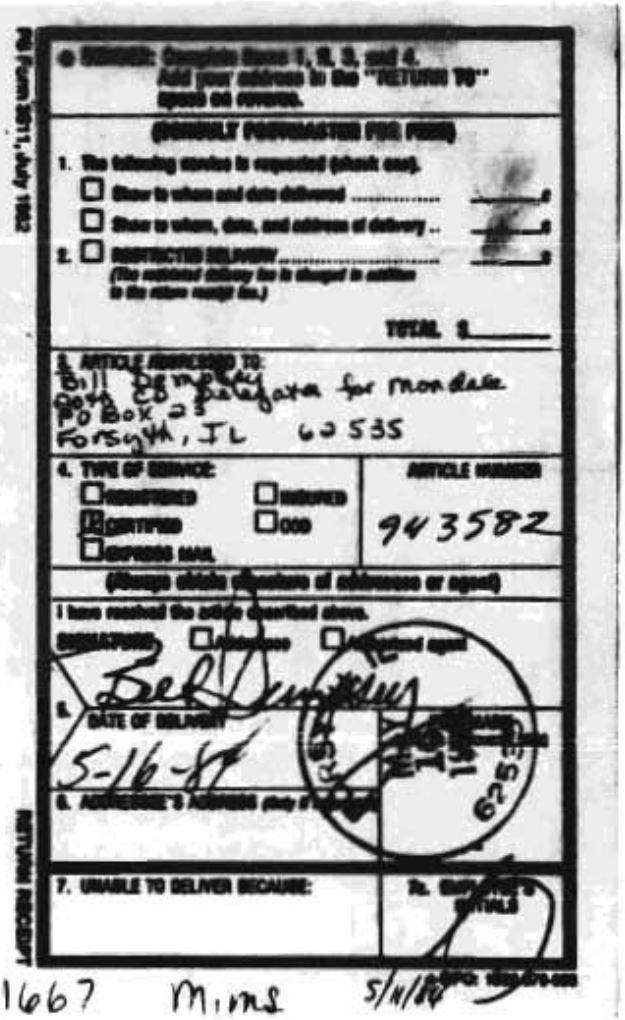
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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



1667 Mims 5/4/84

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LAW OFFICES
FRIEDMAN & KOVEN
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
208 SOUTH LA SALLE STREET
CHICAGO, ILLINOIS 60604
(312) 348-6500
CABLE ADDRESS "FREEZOR"
TELEX 254083

MICHAEL D. SHER
DIRECT TELEPHONE NUMBER
(312) 269-6609

June 18, 1984

Charles N. Steele, Esq.
General Counsel
Federal Election Commission
1325 K Street, N. W.
Washington, DC 20463

84 JUN 22 AM:04

Re: MUR 1667 / Response of Nineteenth District (Illinois) Delegate Committee for Mondale

Dear Mr. Steele:

As and for its response to the Complaint and supplemental submissions of Americans With Hart, Inc., the Nineteenth District (Illinois) Delegate Committee for Mondale adopts and incorporates by reference herein the Response of the Mondale Delegate Committees from the Third, Seventh, Ninth, Fourteenth, Seventeenth, Twentieth and Twenty-Second Districts (Illinois), dated May 25, 1984, and the Response of the Delegates for Mondale Committee - Twenty-First Congressional District (Illinois) and Eleventh District (Illinois) Mondale Delegate Committee, dated June 1, 1984.

Very truly yours,

Michael D. Sher

Michael D. Sher

MDS:ji

3504031330

EDMAN & KOVEN
208 SOUTH LA SALLE STREET
CHICAGO, ILLINOIS 60604

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Charles N. Steele, Esq.
General Counsel
Federal Election Commission
1325 K Street, N. W.
Washington, DC 20463

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LAW OFFICES
FRIEDMAN & KOVEN
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
208 SOUTH LA SALLE STREET
CHICAGO, ILLINOIS 60604
(312) 346-6500
CABLE ADDRESS "FREEZOR"
TELEX 254083

MICHAEL D. SHER
DIRECT TELEPHONE NUMBER
(312) 269-6605

June 18, 1984

Charles N. Steele, Esq.
General Counsel
Federal Election Commission
1325 K Street, N. W.
Washington, DC 20463

Re: MUR 1704 / Consolidated Response of Mondale Delegate Committees from the Twelfth, Nineteenth and Twenty-Second Districts (Illinois)

Dear Mr. Steele:

I have been designated as counsel for each of the above-referenced Mondale Delegate Committees from the State of Illinois (the "Delegate Committees") in MUR 1704. This letter is submitted to the Federal Election Commission (the "Commission") on behalf of the Delegate Committees in response to the Complaint filed with the Commission by the National Right to Work Committee and Ralph Martin (Bud) Hettinga, Jr. on May 18, 1984 (the "Complaint").

The Complaint does not name or designate any of the Delegate Committees as respondents and, accordingly, the Commission should not consider the Delegate Committees as respondents in this proceeding. Section 111.4 of the Commission's regulations requires that each complaint which is filed with the Commission must "clearly identify as a respondent each person or entity who is alleged to have committed a violation" and must "contain a clear and concise recitation of the facts which describe a violation of a statute or regulation over which the Commission has jurisdiction." 11 C.F.R. § 111.4(d)(1) and (3); see also 2 U.S.C. § 437g(a)(1). Neither the caption nor the content of the Complaint designates any of the Delegate Committees as respondents. Moreover, the Complaint fails to recite any facts which describe a violation by any one or more of the Delegate Committees of any "statute or regulation over which the Commission has jurisdiction." Accordingly, at least insofar as the Complaint may be directed to these Delegate Committees, it fails to meet the clear requirements of Section 111.4(d), is fatally defective, should not be considered by the Commission to be directed to these Delegate Committees or, in the alternative, should be dismissed insofar as the Commission determines that it may be directed to these Delegate Committees.

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Since the Complaint, on its face, is not directed against the Delegate Committees, no further response is made to the Complaint on behalf of the Delegate Committees at this time. However, the Delegate Committees reserve their right to respond to the substantive claims of the Complaint at such time as such response may be required.

Respectfully submitted,

TWELFTH DISTRICT (ILLINOIS)
MONDALE DELEGATE COMMITTEE

NINETEENTH DISTRICT (ILLINOIS)
DELEGATE COMMITTEE FOR MONDALE

TWENTY-SECOND CONGRESSIONAL
DISTRICT (ILLINOIS) MONDALE
DELEGATES COMMITTEE

BY Michael D. Sher

Michael D. Sher, Counsel for the
Delegate Committees

Friedman & Koven
208 South LaSalle Street
Chicago, IL 60604
(312) 346-8500

MDS:ji

8504050013 83

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STATEMENT OF DESIGNATION OF COUNSEL

MUR 1704

NAME OF COUNSEL: MICHAEL SAER

ADDRESS: FRIEDMAN + KOVEN, ATTORNEYS at LAW
ROOM 900, 208 S. LaSALLE
CHICAGO, ILLINOIS 60604

TELEPHONE: 312-269-9605

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.

JUNE 11, 1984
Date

19th District Delegates for Mondale Committee
John S. Atkins, Treasurer
Signature

RESPONDENT'S NAME: JOHN S. (STAN) ADKINS

ADDRESS: 2431 E. HARRISON
CHARLESTON, ILLINOIS
61920

HOME PHONE: 217-345-5858

BUSINESS PHONE: 217-345-2196

9504005013841

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1667

NAME OF COUNSEL: MICHAEL SHER

ADDRESS: FRIEDMAN + KOVEN, ATTORNEYS AT LAW
ROOM 900, 208 S. LaSALLE
CHICAGO, ILLINOIS 60604

TELEPHONE: 312-269-9605

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.

JUNE 11, 1984
Date

14th District Delegates for Mondale Committee
John S. Adkins, Treasurer
Signature

RESPONDENT'S NAME: JOHN S. (STAN) ADKINS

ADDRESS: 2431 E. HARRISON
CHARLESTON, ILLINOIS
61920

HOME PHONE: 217-345-5858

BUSINESS PHONE: 217-345-2196

3504050138 5

John S Adkins
2431 E. Harrison
Charleston, Il. 61920



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

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LAW OFFICES
FRIEDMAN & KOVEN
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
208 SOUTH LA SALLE STREET
CHICAGO, ILLINOIS 60604
(312) 346-6800
CABLE ADDRESS "FREEZOR"
TELEX 254083

MICHAEL D. SHER
DIRECT TELEPHONE NUMBER
(312) 269-6805

June 8, 1984

Mr. John D. Gibson
Assistant Staff Director
Reports Analysis Division
Federal Election Commission
1325 K Street, N. W.
Washington, DC 20463

Re: MUR 1667

Dear Mr. Gibson:

I have been designated as counsel for Mondale Delegate Committees from the Third, Fourth, Seventh, Ninth, Eleventh, Twelfth, Fourteenth, Seventeenth, Nineteenth, Twentieth, Twenty-First and Twenty-Second Districts from the State of Illinois (the "Delegate Committees") in the above-referenced proceeding before the Federal Election Commission (the "Commission"). The treasurers of certain of the Delegate Committees have received letters from you, all dated May 16, 1984, which advise the Delegate Committees that in view of the above-referenced proceeding before the Commission, "the Federal Election Commission cannot approve any requests for termination from your committee, at this time." Your letter further reminds the committees "that until termination is authorized, your reporting requirements under 2 U.S.C. § 434 continue."

On behalf of the Delegate Committees, I respectfully suggest that neither Section 434, Section 433(d) nor 11 C.F.R. § 102.3 supports your contention that continued reporting is required by the Delegate Committees until such time as the Commission approves requests for termination. I am unaware of any authority which supports the Commission's apparent position that its authorization is necessary for the termination of a political committee, where that committee "no longer receive[s] any contributions or make[s] any disbursements that would otherwise qualify it as a political committee" and where that committee "has no outstanding debts and obligations." 11 C.F.R. § 102.3(a). Therefore, there appears to be no legal basis for your assertion that the Delegate Committees, which no longer conduct any activities, are required to report to the Commission pursuant to Section 434 until such time as their termination is "approved" by the Commission.

Accordingly, until such time as the Commission explains by what authority it can continue to compel inactive political committees to file reports pursuant to Section 434, the Delegate Committees presently intend to file the appropriate termination reports on the appropriate FEC Forms in accordance with 11 C.F.R. § 102.3, or have already done

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so in certain instances. Based upon the express provisions of Sections 433(d) and 434 of Title 2, and 11 C.F.R. § 102.3 promulgated pursuant thereto, the Delegate Committees respectfully submit that they are not required, nor do they presently intend, to file any additional quarterly reports with the Commission, as such is not required by any of the aforesaid provisions. Please advise me of the Commission's position regarding this matter and whether it has or will reconsider the position expressed in your letter of May 16. Thank you.

Very truly yours,

Michael D. Sher

Michael D. Sher

MDS:ji

cc: Charles N. Steele, Esq.

9504050139

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

John S. Adkins, Treasurer
19th District Delegates
For Mondale Committee
2431 E. Harrison
Charleston, IL 61920

Re: MUR 1667

Dear Mr. Adkins:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

3504013382

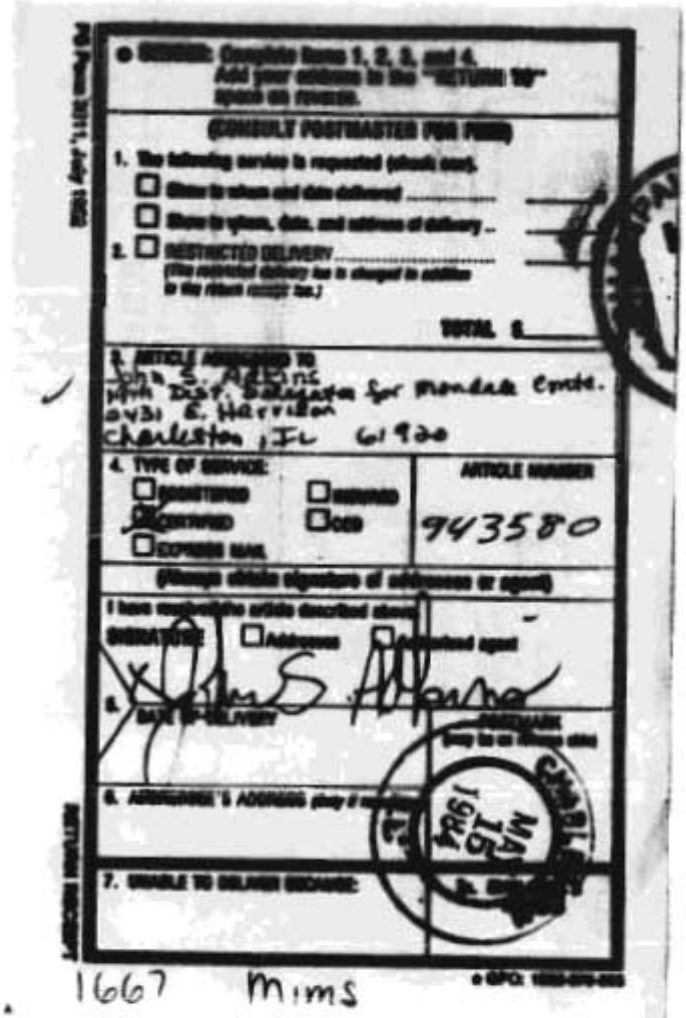
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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



35040501390

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

James K. Polk, Treasurer
Mondale Delegates For the
Illinois 18th Committee
901 W. Brons
Peoria, IL 61604

Re: MUR 1667

Dear Mr. Polk:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

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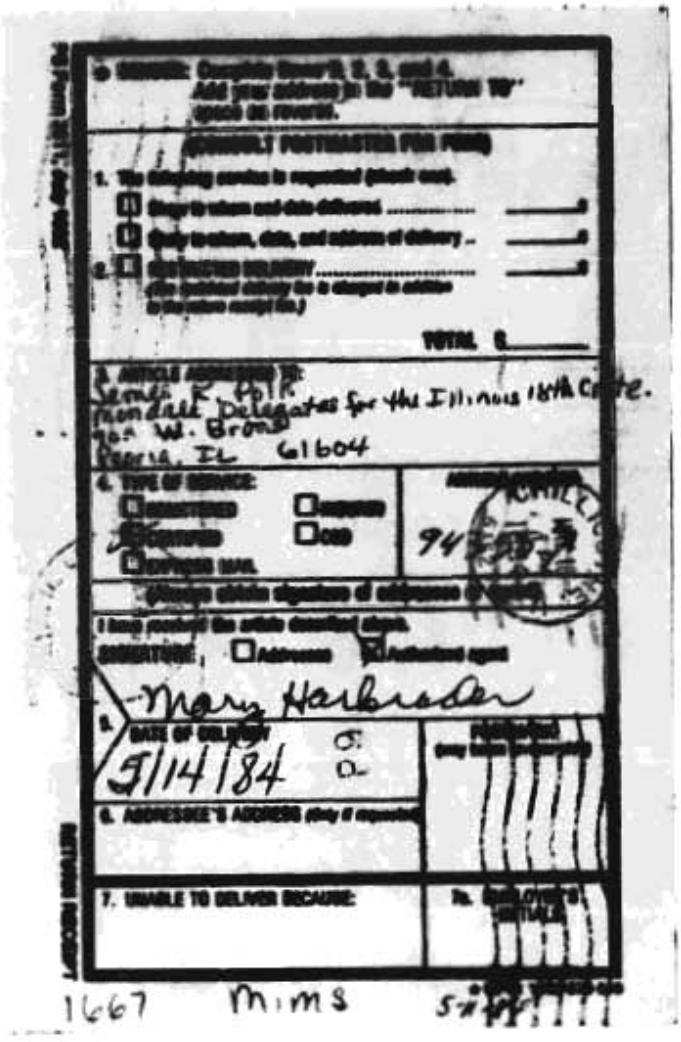
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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



8504050139 2

RECEIVED AT THE FEC
Call 3868
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LAW OFFICES
FRIEDMAN & KOVEN
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
208 SOUTH LA SALLE STREET
CHICAGO, ILLINOIS 60604
(312) 346-6500
CABLE ADDRESS "FREEZON"
TELEX 254083

MICHAEL D. SHER
DIRECT TELEPHONE NUMBER
(312) 269-8008

June 27, 1984

Mr. John D. Gibson
Assistant Staff Director
Reports Analysis Division
Federal Election Commission
1325 K Street, N. W.
Washington, DC 20463

Re: MUR 1667 / Identification No. C00176925

Dear Mr. Gibson:

On June 8, 1984, I wrote to you regarding the May 16, 1984 letter of the Federal Election Commission (the "Commission") which was received by certain delegate committees from the State of Illinois for whom I have been designated as counsel in connection with the above-referenced proceeding. To date, I have not received a response to that letter.

I have been advised by the 17th District (Illinois) Mondale Delegate Committee that it has received a Notice from the Commission dated June 21, 1984, which is entitled "July Reporting Notice for Unauthorized Committees." That Notice suggests that the 17th District Mondale Delegate Committee has a continuing obligation to report to the Commission. However, by its Termination Report dated April 24, 1984, the 17th District Committee terminated its activities. As previously discussed in my letter dated June 8, 1984, there appears to be no authority which supports the Commission's position that the 17th District Committee has a continuing obligation to report. Therefore, for the reasons expressed in that letter of June 8, and as requested therein, please advise me whether the Commission has or will reconsider the position which it expressed in your letter of May 16. Thank you.

Very truly yours,

Michael D. Sher

MDS:ji

cc: Charles N. Steele, Esq.
Ms. Donna M. McWilliams, Treasurer
17th District Mondale Delegate Committee

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FRIEDMAN & KOVEN
208 SOUTH LA SALLE STREET
CHICAGO, ILLINOIS 60604

84 JUN 28 PM 12:35

Charles N. Steele, Esq.
General Counsel
Federal Election Commission
1325 K Street, N. W.
Washington, DC 20463

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Ltr. # 3551
FEC

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LAW OFFICES
FRIEDMAN & KOVEN
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
208 SOUTH LA SALLE STREET
CHICAGO, ILLINOIS 60604
(312) 346-6500
CABLE ADDRESS "FREEZOR"
TELEX 254083

MICHAEL D. SHER
DIRECT TELEPHONE NUMBER
(312) 368-6605

June 8, 1984

Mr. John D. Gibson
Assistant Staff Director
Reports Analysis Division
Federal Election Commission
1325 K Street, N. W.
Washington, DC 20463

Re: MUR 1667

Dear Mr. Gibson:

I have been designated as counsel for Mondale Delegate Committees from the Third, Fourth, Seventh, Ninth, Eleventh, Twelfth, Fourteenth, Seventeenth, Nineteenth, Twentieth, Twenty-First and Twenty-Second Districts from the State of Illinois (the "Delegate Committees") in the above-referenced proceeding before the Federal Election Commission (the "Commission"). The treasurers of certain of the Delegate Committees have received letters from you, all dated May 16, 1984, which advise the Delegate Committees that in view of the above-referenced proceeding before the Commission, "the Federal Election Commission cannot approve any requests for termination from your committee, at this time." Your letter further reminds the committees "that until termination is authorized, your reporting requirements under 2 U.S.C. § 434 continue."

On behalf of the Delegate Committees, I respectfully suggest that neither Section 434, Section 433(d) nor 11 C.F.R. § 102.3 supports your contention that continued reporting is required by the Delegate Committees until such time as the Commission approves requests for termination. I am unaware of any authority which supports the Commission's apparent position that its authorization is necessary for the termination of a political committee, where that committee "no longer receive[s] any contributions or make[s] any disbursements that would otherwise qualify it as a political committee" and where that committee "has no outstanding debts and obligations." 11 C.F.R. § 102.3(a). Therefore, there appears to be no legal basis for your assertion that the Delegate Committees, which no longer conduct any activities, are required to report to the Commission pursuant to Section 434 until such time as their termination is "approved" by the Commission.

Accordingly, until such time as the Commission explains by what authority it can continue to compel inactive political committees to file reports pursuant to Section 434, the Delegate Committees presently intend to file the appropriate termination reports on the appropriate FEC Forms in accordance with 11 C.F.R. § 102.3, or have already done

3504013953

so in certain instances. Based upon the express provisions of Sections 433(d) and 434 of Title 2, and 11 C.F.R. § 102.3 promulgated pursuant thereto, the Delegate Committees respectfully submit that they are not required, nor do they presently intend, to file any additional quarterly reports with the Commission, as such is not required by any of the aforesaid provisions. Please advise me of the Commission's position regarding this matter and whether it has or will reconsider the position expressed in your letter of May 16. Thank you.

Very truly yours,

Michael D. Sher

Michael D. Sher

MDS:ji

cc: Charles N. Steele, Esq.

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LAW OFFICES
FRIEDMAN & KOVEN
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
208 SOUTH LA SALLE STREET
CHICAGO, ILLINOIS 60604
(312) 346-6300
CABLE ADDRESS "FREEZOR"
TELEX 254083

MICHAEL D. SHER
DIRECT TELEPHONE NUMBER:
(312) 368-0006

17th Dist

84 JUN 15 P1:20

June 14, 1984

FEDERAL EXPRESS

Charles N. Steele, Esq.
General Counsel
Federal Election Commission
1325 K Street, N. W.
Washington, DC 20463

Re: MUR 1704 / Consolidated Response of Mondale Delegate Committees from the Third, Fourth, Seventh, Ninth, Eleventh, Fourteenth, Seventeenth, Twentieth and Twenty-First Districts (Illinois)

Dear Mr. Steele:

Enclosed are the Statements of Designation of Counsel which designate me as counsel for each of the above-referenced Mondale Delegate Committees from the State of Illinois (the "Delegate Committees") in MUR 1704. This letter is submitted to the Federal Election Commission (the "Commission") on behalf of the Delegate Committees in response to the Complaint filed with the Commission by the National Right to Work Committee and Ralph Martin (Bud) Hettinga, Jr. on May 18, 1984 (the "Complaint").

The Complaint does not name or designate any of the Delegate Committees as respondents and, accordingly, the Commission should not consider the Delegate Committees as respondents in this proceeding. Section 111.4 of the Commission's regulations requires that each complaint which is filed with the Commission must "clearly identify as a respondent each person or entity who is alleged to have committed a violation" and must "contain a clear and concise recitation of the facts which describe a violation of a statute or regulation over which the Commission has jurisdiction." 11 C.F.R. § 111.4(d)(1) and (3); see also 2 U.S.C. § 437g(a)(1). Neither the caption nor the content of the Complaint designates any of the Delegate Committees as respondents. Moreover, the Complaint fails to recite any facts which describe a violation by any one or more of the Delegate Committees of any "statute or regulation over which the Commission has jurisdiction." Accordingly, at least insofar as the Complaint may be directed to these Delegate Committees, it fails to meet the clear requirements of Section 111.4(d), is fatally defective, should not be considered by the Commission to be directed to these Delegate Committees or, in the alternative, should be dismissed insofar as the Commission determines that it may be directed to these Delegate Committees.

3504050139 7

Since the Complaint, on its face, is not directed against the Delegate Committees, no further response is made to the Complaint on behalf of the Delegate Committees at this time. However, the Delegate Committees reserve their right to respond to the substantive claims of the Complaint at such time as such response may be required.

Respectfully submitted,

THIRD CONGRESSIONAL DISTRICT (ILLINOIS) DELEGATES FOR MONDALE

FOURTH DISTRICT (ILLINOIS) MONDALE DELEGATE COMMITTEE

COMMITTEE CONGRESSIONAL DISTRICT (ILLINOIS) DELEGATES FOR MONDALE

NINTH DISTRICT (ILLINOIS) MONDALE DELEGATE COMMITTEE

ELEVENTH DISTRICT (ILLINOIS) MONDALE DELEGATE COMMITTEE

FOURTEENTH DISTRICT (ILLINOIS) DELEGATE COMMITTEE FOR MONDALE

SEVENTEENTH DISTRICT (ILLINOIS) MONDALE DELEGATE COMMITTEE

TWENTIETH CONGRESSIONAL DISTRICT (ILLINOIS) DELEGATES FOR MONDALE

TWENTY-FIRST CONGRESSIONAL DISTRICT (ILLINOIS) MONDALE DELEGATES COMMITTEE

BY Michael D. Sher

Michael D. Sher, Counsel for the Delegate Committees

Friedman & Koven
208 South LaSalle Street
Chicago, IL 60604
(312) 346-8500

MDS:ji

3504013998

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1704

NAME OF COUNSEL: Brad Jansen and Michael D. Sher
Friedman & Koven

ADDRESS: 208 S. LaSalle Street
Chicago, Illinois 60604

TELEPHONE: (312) 346-8500

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.

6/8/84
Date

Donna M. McWilliams
Signature

RESPONDENT'S NAME: Donna M. McWilliams, Treasurer
17th District Mondale Delegate
Committee

ADDRESS: 400 Rock Island Bank Building
P. O. Box 428
~~Rock Island, IL. 61201~~

HOME PHONE: (309) 786-0068

BUSINESS PHONE: (309) 794-1515

3504050139 9

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84 MAY 22 A 9:58

LAW OFFICES

FRIEDMAN & KOVEN

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

208 SOUTH LA SALLE STREET

CHICAGO, ILLINOIS 60604

(312) 348-6500

CABLE ADDRESS "FREEZOR"

TELEX 254083

MICHAEL D. SHER

DIRECT TELEPHONE NUMBER:

(312) 269-2009

1 Att Sheet

May 21, 1985

Charles N. Steele, Esq.
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, DC 20463

Re: MUR 1667

Dear Mr. Steele:

Enclosed are the Statements of Designation of Counsel of the Seventh Congressional District (Illinois) Delegates for Mondale, the Seventeenth District (Illinois) Mondale Delegate Committee and the Twentieth Congressional District (Illinois) Delegates for Mondale which designate me as counsel for those Delegate Committees in the above-referenced proceeding. I will file responses on behalf of those Delegate Committees with the Commission in accordance with the Federal Election Campaign Act.

Very truly yours,

Michael D. Sher

Michael D. Sher

MDS:ji

Enclosures

cc: William H. Taylor, Esq.
Mr. Bill Dempsey
Ms. Donna M. McWilliams

8504050014 00

STATEMENT OF DESIGNATION OF COUNSEL

MUR 17th District Mondale Delegate Committee

NAME OF COUNSEL: Michael D. Sher

ADDRESS: Friedman and Koven
208 S. LaSalle
Chicago, Illinois 60604

TELEPHONE: (312) 269-9605

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

Donna M. McWilliams
Signature

RESPONDENT'S NAME: Donna M. McWilliams, Treasurer

ADDRESS: 17th District Mondale Delegate Committee
400 Rock Island Bank Building
P. O. Box 428
Rock Island, Illinois 61201

HOME PHONE: (309) 786-0068

BUSINESS PHONE: (309) 794-1515

3504050140 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Donna M. McWilliams, Treasurer
17th District Mondale Delegate
Committee
400 Rock Island Bank Building
P.O. Box 428
Rock Island, IL 61201

Re: MUR 1667

Dear Ms. McWilliams:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

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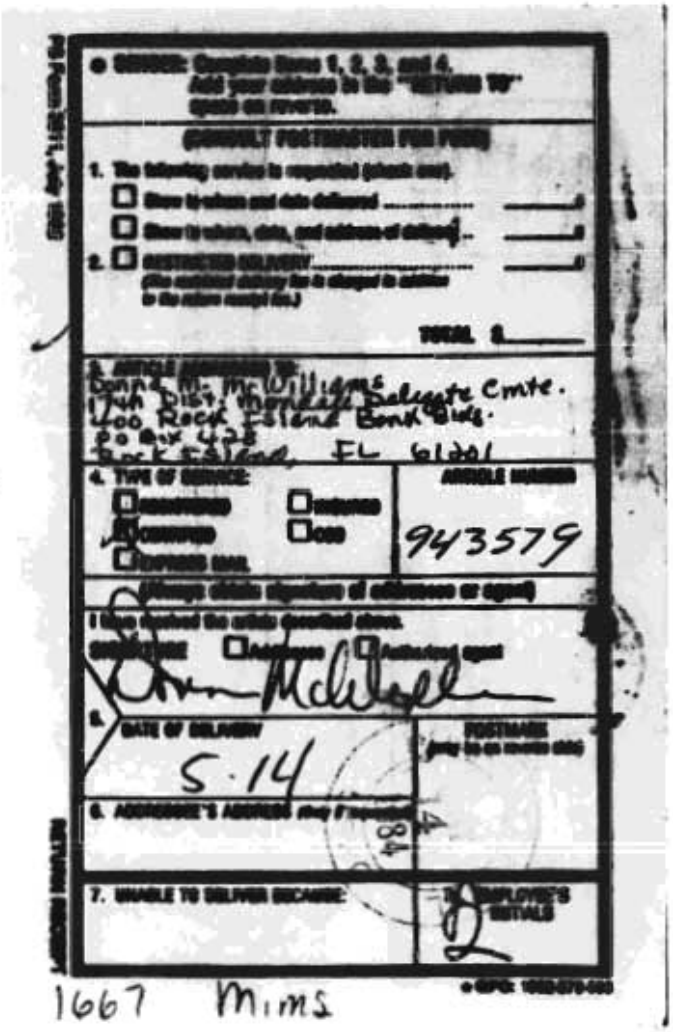
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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



3504050140 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Frank G. Mabrey, Treasurer
16th Delegates For Mondale
1130 North Main
Rockford, IL 61103

Re: MUR 1667

Dear Mr. Mabrey:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

8504050140 4

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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

9504050405

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Herman L. Dammerman, Treasurer
15th District Delegates For
Mondale
1407 Hanson Drive
Normal, IL 61761

Re: MUR 1667

Dear Mr. Dammerman:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

3504051406

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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

3504050014 07

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LAW OFFICES
FRIEDMAN & KOVEN
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
208 SOUTH LA SALLE STREET
CHICAGO, ILLINOIS 60604
(312) 346-6500
CABLE ADDRESS "FREEZOR"
TELEX 254063

MICHAEL D. SHER
DIRECT TELEPHONE NUMBER:
(312) 360-6006

14th Dist

84 JUN 15 P1:20

June 14, 1984

FEDERAL EXPRESS

Charles N. Steele, Esq.
General Counsel
Federal Election Commission
1325 K Street, N. W.
Washington, DC 20463

Re: MUR 1704 / Consolidated Response of Mondale Delegate Committees from the Third, Fourth, Seventh, Ninth, Eleventh, Fourteenth, Seventeenth, Twentieth and Twenty-First Districts (Illinois)

Dear Mr. Steele:

Enclosed are the Statements of Designation of Counsel which designate me as counsel for each of the above-referenced Mondale Delegate Committees from the State of Illinois (the "Delegate Committees") in MUR 1704. This letter is submitted to the Federal Election Commission (the "Commission") on behalf of the Delegate Committees in response to the Complaint filed with the Commission by the National Right to Work Committee and Ralph Martin (Bud) Hettinga, Jr. on May 18, 1984 (the "Complaint").

The Complaint does not name or designate any of the Delegate Committees as respondents and, accordingly, the Commission should not consider the Delegate Committees as respondents in this proceeding. Section 111.4 of the Commission's regulations requires that each complaint which is filed with the Commission must "clearly identify as a respondent each person or entity who is alleged to have committed a violation" and must "contain a clear and concise recitation of the facts which describe a violation of a statute or regulation over which the Commission has jurisdiction." 11 C.F.R. § 111.4(d)(1) and (3); see also 2 U.S.C. § 437g(a)(1). Neither the caption nor the content of the Complaint designates any of the Delegate Committees as respondents. Moreover, the Complaint fails to recite any facts which describe a violation by any one or more of the Delegate Committees of any "statute or regulation over which the Commission has jurisdiction." Accordingly, at least insofar as the Complaint may be directed to these Delegate Committees, it fails to meet the clear requirements of Section 111.4(d), is fatally defective, should not be considered by the Commission to be directed to these Delegate Committees or, in the alternative, should be dismissed insofar as the Commission determines that it may be directed to these Delegate Committees.

3504050140 8

Since the Complaint, on its face, is not directed against the Delegate Committees, no further response is made to the Complaint on behalf of the Delegate Committees at this time. However, the Delegate Committees reserve their right to respond to the substantive claims of the Complaint at such time as such response may be required.

Respectfully submitted,

THIRD CONGRESSIONAL DISTRICT (ILLINOIS) DELEGATES FOR MONDALE

FOURTH DISTRICT (ILLINOIS) MONDALE DELEGATE COMMITTEE

COMMITTEE CONGRESSIONAL DISTRICT (ILLINOIS) DELEGATES FOR MONDALE

NINTH DISTRICT (ILLINOIS) MONDALE DELEGATE COMMITTEE

ELEVENTH DISTRICT (ILLINOIS) MONDALE DELEGATE COMMITTEE

FOURTEENTH DISTRICT (ILLINOIS) DELEGATE COMMITTEE FOR MONDALE

SEVENTEENTH DISTRICT (ILLINOIS) MONDALE DELEGATE COMMITTEE

TWENTIETH CONGRESSIONAL DISTRICT (ILLINOIS) DELEGATES FOR MONDALE

TWENTY-FIRST CONGRESSIONAL DISTRICT (ILLINOIS) MONDALE DELEGATES COMMITTEE

BY Michael D. Sher

Michael D. Sher, Counsel for the Delegate Committees

Friedman & Koven
208 South LaSalle Street
Chicago, IL 60604
(312) 346-6500

MDS:ji

3504050I409

Ltr # 3558
FEC

14 JUN 11 AM 8:55

LAW OFFICES
FRIEDMAN & KOVEN
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
208 SOUTH LA SALLE STREET
CHICAGO, ILLINOIS 60604
(312) 346-6500
CABLE ADDRESS "FREEZOR"
TELEX 254083

MICHAEL D. SHER
DIRECT TELEPHONE NUMBER:
(312) 922-9605

June 8, 1984

Mr. John D. Gibson
Assistant Staff Director
Reports Analysis Division
Federal Election Commission
1325 K Street, N. W.
Washington, DC 20463

Re: MUR 1667

Dear Mr. Gibson:

I have been designated as counsel for Mondale Delegate Committees from the Third, Fourth, Seventh, Ninth, Eleventh, Twelfth, Fourteenth, Seventeenth, Nineteenth, Twentieth, Twenty-First and Twenty-Second Districts from the State of Illinois (the "Delegate Committees") in the above-referenced proceeding before the Federal Election Commission (the "Commission"). The treasurers of certain of the Delegate Committees have received letters from you, all dated May 16, 1984, which advise the Delegate Committees that in view of the above-referenced proceeding before the Commission, "the Federal Election Commission cannot approve any requests for termination from your committee, at this time." Your letter further reminds the committees "that until termination is authorized, your reporting requirements under 2 U.S.C. § 434 continue."

On behalf of the Delegate Committees, I respectfully suggest that neither Section 434, Section 433(d) nor 11 C.F.R. § 102.3 supports your contention that continued reporting is required by the Delegate Committees until such time as the Commission approves requests for termination. I am unaware of any authority which supports the Commission's apparent position that its authorization is necessary for the termination of a political committee, where that committee "no longer receive[s] any contributions or make[s] any disbursements that would otherwise qualify it as a political committee" and where that committee "has no outstanding debts and obligations." 11 C.F.R. § 102.3(a). Therefore, there appears to be no legal basis for your assertion that the Delegate Committees, which no longer conduct any activities, are required to report to the Commission pursuant to Section 434 until such time as their termination is "approved" by the Commission.

Accordingly, until such time as the Commission explains by what authority it can continue to compel inactive political committees to file reports pursuant to Section 434, the Delegate Committees presently intend to file the appropriate termination reports on the appropriate FEC Forms in accordance with 11 C.F.R. § 102.3, or have already done

3504030410

so in certain instances. Based upon the express provisions of Sections 433(d) and 434 of Title 2, and 11 C.F.R. § 102.3 promulgated pursuant thereto, the Delegate Committees respectfully submit that they are not required, nor do they presently intend, to file any additional quarterly reports with the Commission, as such is not required by any of the aforesaid provisions. Please advise me of the Commission's position regarding this matter and whether it has or will reconsider the position expressed in your letter of May 16. Thank you.

Very truly yours,

Michael D. Sher

Michael D. Sher

MDS:ji

cc: Charles N. Steele, Esq.

35040501411

STATEMENT OF DESIGNATION OF COUNSEL

MUR _____

NAME OF COUNSEL: MICHAEL SHER

ADDRESS: 208 So. LASALLE ST., SUITE 900
CHICAGO, ILLINOIS
60604

TELEPHONE: (312) 346-8500

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.

6/7/84
Date

Jerome C. Shapiro
Signature

RESPONDENT'S NAME: 14th ~~District~~ Delegate Committee for Mondale

ADDRESS: 7 PHEASANT RUN
DEKALB, ILLINOIS
60115

HOME PHONE: (815) 756-8637

BUSINESS PHONE: (815) 758-6616

3504050141 2

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84 MAY 24 AM : 02

LAW OFFICES
FRIEDMAN & KOVEN
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
208 SOUTH LA SALLE STREET
CHICAGO, ILLINOIS 60604
(312) 348-6500
CABLE ADDRESS "FREEZOR"
TELEX 254083

MICHAEL D. SHER
DIRECT TELEPHONE NUMBER
(312) 269-8609

May 22, 1985

84 MAY 25 AM 12:44

Charles N. Steele, Esq.
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, DC 20463

Mims

Re: MUR 1667

Dear Mr. Steele:

Enclosed are the Statements of Designation of Counsel of the 14th District (Illinois) Delegate Committee for Mondale and the 22nd Congressional District (Illinois) Delegates for Mondale which designate me as counsel for those Delegate Committees in the above-referenced proceeding. I will file responses on behalf of those Delegate Committees with the Commission in accordance with the Federal Election Campaign Act.

As discussed today with Mr. Stephen Mims of your office, Mr. Patrick Brumleve, Treasurer of the 22nd District Committee, did not receive the papers transmitted with the Commission's letter of May 4, 1984 until May 14, 1984. Accordingly, the response of the 22nd District Committee will be filed within 15 days of May 14.

Very truly yours,

Michael D. Sher

Michael D. Sher

MDS:ji

Enclosures

cc: Mr. Jerome C. Shapiro
Mr. Patrick C. Brumleve

3504050141 3

RECEIVED AT THE FEC

STATEMENT OF DESIGNATION OF COUNSEL

84 MAY 24 AM : 02

MUR _____

NAME OF COUNSEL: Michael Sher

ADDRESS: 208 South LaSalle
Chicago, IL 60604

TELEPHONE: (312) 269-9605

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.

5/21/84
Date

Jerome L. Shapiro
Signature
Treasurer

RESPONDENT'S NAME: 14th District Delegate Committee for Mondale

ADDRESS: 7 Pheasant Run
DeKalb, IL 60115

HOME PHONE: (815) 756-8632

BUSINESS PHONE: (815) 758-6616

3504030141

FRIEDMAN & KOVEN
208 SOUTH LA SALLE STREET
CHICAGO, ILLINOIS 60604

84 MAY 24 A11:02

Charles N. Steele, Esq.
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, DC 20463

5040501415

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Jerome C. Shapiro, Treasurer
14th District Delegates For
Mondale
7 Pheasant Run
Dekalb, IL 60115

Re: MUR 1667

Dear Mr. Shapiro:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

3504050146

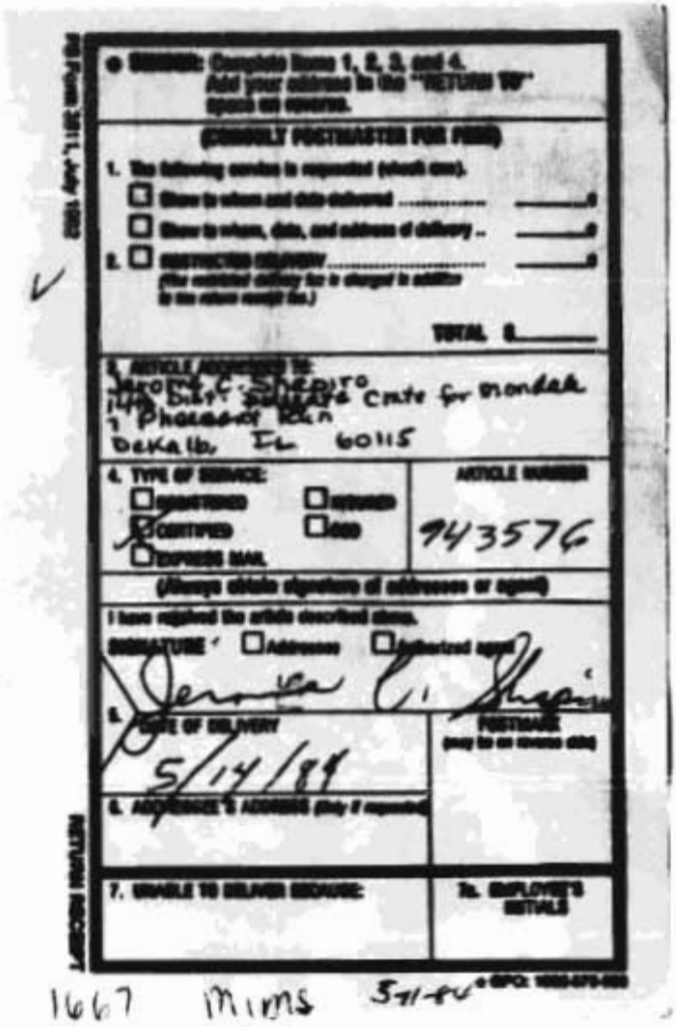
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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



1667 Mims 5-14-84

3524032117

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Joan P. Murphy, Treasurer
13th Congressional District
Delegate Committee For
Walter F. Mondale
11601 South Pulaski
Alsip, IL 60658

Re: MUR 1667

Dear Ms. Murphy:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

3504050418

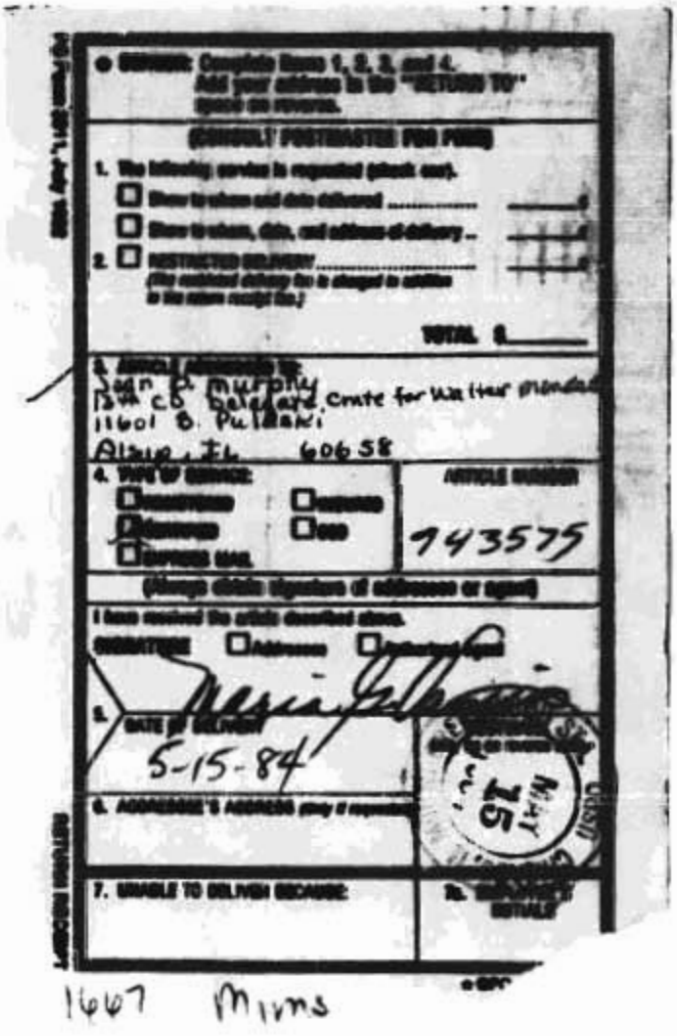
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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



35240501419

Ga# 3757

RECEIVED BY FEC

84 JUN 25 A8:47

LAW OFFICES

FRIEDMAN & KOVEN

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

208 SOUTH LA SALLE STREET

CHICAGO, ILLINOIS 60604

(312) 346-6500

CABLE ADDRESS "FREEZOR"

TELEX 254083

MICHAEL D. SHER
DIRECT TELEPHONE NUMBER:
(312) 922-6609

June 18, 1984

84 JUN 25 AM 10:03

Charles N. Steele, Esq.
General Counsel
Federal Election Commission
1325 K Street, N. W.
Washington, DC 20463

Re: MUR 1704 / Twelfth District (Illinois)
Mondale Delegate Committee

Dear Mr. Steele:

Enclosed is the Statement of Designation of Counsel of the Twelfth District (Illinois) Mondale Delegate Committee which designates me as counsel for the Committee in the above-referenced proceeding.

Very truly yours,

Michael D. Sher

Michael D. Sher

MDS:ji

Enclosure

3504030014220

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1704

NAME OF COUNSEL: MICHAEL D. SHER

ADDRESS: Friedman & Koven
208 South LaSalle Street
Chicago, IL 60604

TELEPHONE: 312/346-8500

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.

June 15, 1984
Date

Signature George A. Moser

RESPONDENT'S NAME: Twelfth District (Illinois) Mondale Delegate Committee
George A. Moser

ADDRESS: 2200 W. Higgins Road
Hoffman Estates, IL 60195

HOME PHONE: 381-5353

BUSINESS PHONE: 882-1000

3504001421

DMAN & KOVEN
SOUTH LA SALLE STREET
AGO, ILLINOIS 60604

84 JUN 25 A8 7

Charles N. Steele, Esq.
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, DC 20463

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Cat 3763
84 JUN 25 A8:30

LAW OFFICES
FRIEDMAN & KOVEN
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
208 SOUTH LA SALLE STREET
CHICAGO, ILLINOIS 60604
(312) 346-8500
CABLE ADDRESS "FREEZOR"
TELEX 254083

MICHAEL D. SHER
DIRECT TELEPHONE NUMBER
(312) 269-9605

84 JUN 25 AM 11:12

June 18, 1984

Charles N. Steele, Esq.
General Counsel
Federal Election Commission
1325 K Street, N. W.
Washington, DC 20463

Re: MUR 1704 / Consolidated Response of Mondale Delegate Committees from the Twelfth, Nineteenth and Twenty-Second Districts (Illinois)

Dear Mr. Steele:

I have been designated as counsel for each of the above-referenced Mondale Delegate Committees from the State of Illinois (the "Delegate Committees") in MUR 1704. This letter is submitted to the Federal Election Commission (the "Commission") on behalf of the Delegate Committees in response to the Complaint filed with the Commission by the National Right to Work Committee and Ralph Martin (Bud) Hettinga, Jr. on May 18, 1984 (the "Complaint").

The Complaint does not name or designate any of the Delegate Committees as respondents and, accordingly, the Commission should not consider the Delegate Committees as respondents in this proceeding. Section 111.4 of the Commission's regulations requires that each complaint which is filed with the Commission must "clearly identify as a respondent each person or entity who is alleged to have committed a violation" and must "contain a clear and concise recitation of the facts which describe a violation of a statute or regulation over which the Commission has jurisdiction." 11 C.F.R. § 111.4(d)(1) and (3); see also 2 U.S.C. § 437g(a)(1). Neither the caption nor the content of the Complaint designates any of the Delegate Committees as respondents. Moreover, the Complaint fails to recite any facts which describe a violation by any one or more of the Delegate Committees of any "statute or regulation over which the Commission has jurisdiction." Accordingly, at least insofar as the Complaint may be directed to these Delegate Committees, it fails to meet the clear requirements of Section 111.4(d), is fatally defective, should not be considered by the Commission to be directed to these Delegate Committees or, in the alternative, should be dismissed insofar as the Commission determines that it may be directed to these Delegate Committees.

3504031423

Since the Complaint, on its face, is not directed against the Delegate Committees, no further response is made to the Complaint on behalf of the Delegate Committees at this time. However, the Delegate Committees reserve their right to respond to the substantive claims of the Complaint at such time as such response may be required.

Respectfully submitted,

TWELFTH DISTRICT (ILLINOIS)
MONDALE DELEGATE COMMITTEE

NINETEENTH DISTRICT (ILLINOIS)
DELEGATE COMMITTEE FOR MONDALE

TWENTY-SECOND CONGRESSIONAL
DISTRICT (ILLINOIS) MONDALE
DELEGATES COMMITTEE

BY Michael D. Sher

Michael D. Sher, Counsel for the
Delegate Committees

Friedman & Koven
208 South LaSalle Street
Chicago, IL 60604
(312) 346-8500

MDS:ji

3504031424

FRIEDMAN & KOVEN
208 SOUTH LA SALLE STREET
CHICAGO, ILLINOIS 60604

RECEIVED
84 JUN 25 A8

Charles N. Steele, Esq.
General Counsel
Federal Election Commission
1325 K Street, N. W.
Washington, DC 20463

Log # 3558

14 JUN 11 A8:55

LAW OFFICES

FRIEDMAN & KOVEN

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

208 SOUTH LA SALLE STREET

CHICAGO, ILLINOIS 60604

(312) 348-8500

CABLE ADDRESS "FREEZOR"

TELEX 254083

MICHAEL D. SHER

DIRECT TELEPHONE NUMBER

(312) 922-9605

June 8, 1984

Mr. John D. Gibson
Assistant Staff Director
Reports Analysis Division
Federal Election Commission
1325 K Street, N. W.
Washington, DC 20463

Re: MUR 1667

Dear Mr. Gibson:

I have been designated as counsel for Mondale Delegate Committees from the Third, Fourth, Seventh, Ninth, Eleventh, Twelfth, Fourteenth, Seventeenth, Nineteenth, Twentieth, Twenty-First and Twenty-Second Districts from the State of Illinois (the "Delegate Committees") in the above-referenced proceeding before the Federal Election Commission (the "Commission"). The treasurers of certain of the Delegate Committees have received letters from you, all dated May 16, 1984, which advise the Delegate Committees that in view of the above-referenced proceeding before the Commission, "the Federal Election Commission cannot approve any requests for termination from your committee, at this time." Your letter further reminds the committees "that until termination is authorized, your reporting requirements under 2 U.S.C. § 434 continue."

On behalf of the Delegate Committees, I respectfully suggest that neither Section 434, Section 433(d) nor 11 C.F.R. § 102.3 supports your contention that continued reporting is required by the Delegate Committees until such time as the Commission approves requests for termination. I am unaware of any authority which supports the Commission's apparent position that its authorization is necessary for the termination of a political committee, where that committee "no longer receive[s] any contributions or make[s] any disbursements that would otherwise qualify it as a political committee" and where that committee "has no outstanding debts and obligations." 11 C.F.R. § 102.3(a). Therefore, there appears to be no legal basis for your assertion that the Delegate Committees, which no longer conduct any activities, are required to report to the Commission pursuant to Section 434 until such time as their termination is "approved" by the Commission.

Accordingly, until such time as the Commission explains by what authority it can continue to compel inactive political committees to file reports pursuant to Section 434, the Delegate Committees presently intend to file the appropriate termination reports on the appropriate FEC Forms in accordance with 11 C.F.R. § 102.3, or have already done

8504050426

so in certain instances. Based upon the express provisions of Sections 433(d) and 434 of Title 2, and 11 C.F.R. § 102.3 promulgated pursuant thereto, the Delegate Committees respectfully submit that they are not required, nor do they presently intend, to file any additional quarterly reports with the Commission, as such is not required by any of the aforesaid provisions. Please advise me of the Commission's position regarding this matter and whether it has or will reconsider the position expressed in your letter of May 16. Thank you.

Very truly yours,

Michael D. Sher

MDS:ji

cc: Charles N. Steele, Esq.

35040501427

Gen # 3552
RECEIVED AT THE FEC

84 JUN 11 AM 9:

LAW OFFICES
FRIEDMAN & KOVEN
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
208 SOUTH LA SALLE STREET
CHICAGO, ILLINOIS 60604
(312) 348-8500
CABLE ADDRESS "FREEZOR"
TELEX 254083

MICHAEL D. SHER
DIRECT TELEPHONE NUMBER:
(312) 360-6605

Response
12th

12 JUN 11 AM 9:27

June 7, 1984

Charles N. Steele, Esq.
General Counsel
Federal Election Commission
1325 K Street, N. W.
Washington, DC 20463

Re: MUR 1667 / Twelfth District (Illinois) Mondale Delegate Committee

Dear Mr. Steele:

Enclosed is the Statement of Designation of Counsel of the Twelfth District (Illinois) Mondale Delegate Committee (the "Committee") which designates me as counsel for the Committee in the above-referenced proceeding.

As and for its response to the Complaint and supplemental submissions of Americans With Hart, Inc., the Committee adopts and incorporates by reference herein the Response of the Mondale Delegate Committees from the Third, Seventh, Ninth, Fourteenth, Seventeenth, Twentieth and Twenty-Second Districts (Illinois), dated May 25, 1984, and the Response of the Delegates for Mondale Committee - Twenty-First Congressional District (Illinois) and Eleventh District (Illinois) Mondale Delegate Committee, dated June 1, 1984.

Very truly yours,

Michael D. Sher

Michael D. Sher

MDS:ji

Enclosure

3504014

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1667

NAME OF COUNSEL: MICHAEL D. SHER

ADDRESS: FRIEDMAN & KOVEN
208 South LaSalle Street
Chicago, IL 60604

TELEPHONE: 312/346-8500

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.

6-5-84
Date

X George A. Moser
Signature George A. Moser

RESPONDENT'S NAME: 12th District Mondale Delegate Committee
George A. Moser

ADDRESS: 2200 W. Higgins Rd.
Hoffman Estates, IL 60195

HOME PHONE: 381.5353

BUSINESS PHONE: 882-1000

3504050014429

FRIEDMAN & KOVEN
208 SOUTH LA SALLE STREET
CHICAGO, ILLINOIS 60604

84 JUN 11 PM 1:

Charles N. Steele, Esq.
General Counsel
Federal Election Commission
1325 K Street, N. W.
Washington, DC 20463

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1667

NAME OF COUNSEL: MICHAEL D. SHER

ADDRESS: FRIEDMAN & KOVEN
208 South LaSalle Street
Chicago, IL 60604

TELEPHONE: 312/346-8500

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.

6-5-84
Date

Signature George A. Moser

RESPONDENT'S NAME: 12th District Mondale Delegate Committee
George A. Moser

ADDRESS: 2200 W. Higgins Rd.
Hoffman Estates, IL 60195

HOME PHONE: 381.5353

BUSINESS PHONE: 882-1000

3504050143 1

FEDERAL ELECTION COMMISSION
WASHINGTON D C 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

George Moser, Treasurer
12th District Mondale
Delegate Committee
2200 West Higgins Road
Hoffman Estates, IL 60195

Re: MUR 1667

3504501432

Dear Mr. Moser:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

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

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

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

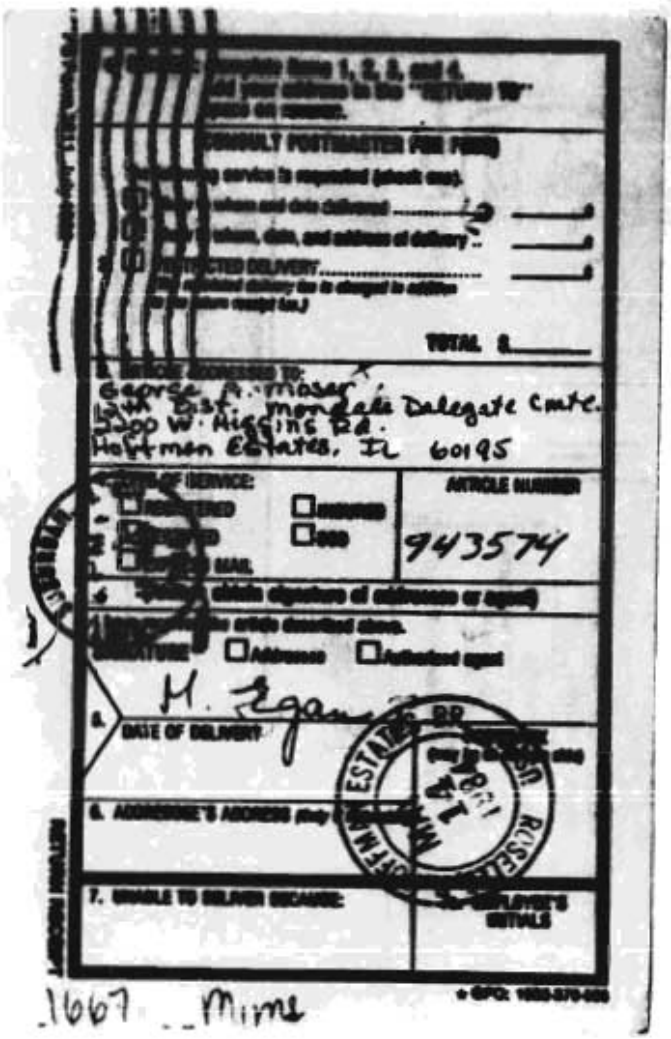
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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



3594005014433

FEC
HAND DELIVERED
84 JUN 15 A9:36
Cat 363)

LAW OFFICES
FRIEDMAN & KOVEN
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
208 SOUTH LA SALLE STREET
CHICAGO, ILLINOIS 60604
(312) 348-6500
CABLE ADDRESS "FREEZON"
TELEX 254083

MICHAEL D. SHER
DIRECT TELEPHONE NUMBER:
(312) 348-6606

11th Dist

84 JUN 15 P1:20

June 14, 1984

FEDERAL EXPRESS

Charles N. Steele, Esq.
General Counsel
Federal Election Commission
1325 K Street, N. W.
Washington, DC 20463

Re: MUR 1704 / Consolidated Response of Mondale Delegate Committees from the Third, Fourth, Seventh, Ninth, Eleventh, Fourteenth, Seventeenth, Twentieth and Twenty-First Districts (Illinois)

Dear Mr. Steele:

Enclosed are the Statements of Designation of Counsel which designate me as counsel for each of the above-referenced Mondale Delegate Committees from the State of Illinois (the "Delegate Committees") in MUR 1704. This letter is submitted to the Federal Election Commission (the "Commission") on behalf of the Delegate Committees in response to the Complaint filed with the Commission by the National Right to Work Committee and Ralph Martin (Bud) Hettinga, Jr. on May 18, 1984 (the "Complaint").

The Complaint does not name or designate any of the Delegate Committees as respondents and, accordingly, the Commission should not consider the Delegate Committees as respondents in this proceeding. Section 111.4 of the Commission's regulations requires that each complaint which is filed with the Commission must "clearly identify as a respondent each person or entity who is alleged to have committed a violation" and must "contain a clear and concise recitation of the facts which describe a violation of a statute or regulation over which the Commission has jurisdiction." 11 C.F.R. § 111.4(d)(1) and (3); see also 2 U.S.C. § 437g(a)(1). Neither the caption nor the content of the Complaint designates any of the Delegate Committees as respondents. Moreover, the Complaint fails to recite any facts which describe a violation by any one or more of the Delegate Committees of any "statute or regulation over which the Commission has jurisdiction." Accordingly, at least insofar as the Complaint may be directed to these Delegate Committees, it fails to meet the clear requirements of Section 111.4(d), is fatally defective, should not be considered by the Commission to be directed to these Delegate Committees or, in the alternative, should be dismissed insofar as the Commission determines that it may be directed to these Delegate Committees.

3504050435

Since the Complaint, on its face, is not directed against the Delegate Committees, no further response is made to the Complaint on behalf of the Delegate Committees at this time. However, the Delegate Committees reserve their right to respond to the substantive claims of the Complaint at such time as such response may be required.

Respectfully submitted,

THIRD CONGRESSIONAL DISTRICT (ILLINOIS) DELEGATES FOR MONDALE

FOURTH DISTRICT (ILLINOIS) MONDALE DELEGATE COMMITTEE

COMMITTEE CONGRESSIONAL DISTRICT (ILLINOIS) DELEGATES FOR MONDALE

NINTH DISTRICT (ILLINOIS) MONDALE DELEGATE COMMITTEE

ELEVENTH DISTRICT (ILLINOIS) MONDALE DELEGATE COMMITTEE

FOURTEENTH DISTRICT (ILLINOIS) DELEGATE COMMITTEE FOR MONDALE

SEVENTEENTH DISTRICT (ILLINOIS) MONDALE DELEGATE COMMITTEE

TWENTIETH CONGRESSIONAL DISTRICT (ILLINOIS) DELEGATES FOR MONDALE

TWENTY-FIRST CONGRESSIONAL DISTRICT (ILLINOIS) MONDALE DELEGATES COMMITTEE

BY Michael D. Sher

Michael D. Sher, Counsel for the Delegate Committees

Friedman & Koven
208 South LaSalle Street
Chicago, IL 60604
(312) 346-8500

MDS:ji

3504050014436

Ltr. # 3558
FEC

14 JUN 11 A8:55

LAW OFFICES
FRIEDMAN & KOVEN
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
208 SOUTH LA SALLE STREET
CHICAGO, ILLINOIS 60604
(312) 346-6500
CABLE ADDRESS "FREEZOR"
TELEX 254083

MICHAEL D. SHER
DIRECT TELEPHONE NUMBER
(312) 269-9605

June 8, 1984

Mr. John D. Gibson
Assistant Staff Director
Reports Analysis Division
Federal Election Commission
1325 K Street, N. W.
Washington, DC 20463

Re: MUR 1667

Dear Mr. Gibson:

I have been designated as counsel for Mondale Delegate Committees from the Third, Fourth, Seventh, Ninth, Eleventh, Twelfth, Fourteenth, Seventeenth, Nineteenth, Twentieth, Twenty-First and Twenty-Second Districts from the State of Illinois (the "Delegate Committees") in the above-referenced proceeding before the Federal Election Commission (the "Commission"). The treasurers of certain of the Delegate Committees have received letters from you, all dated May 16, 1984, which advise the Delegate Committees that in view of the above-referenced proceeding before the Commission, "the Federal Election Commission cannot approve any requests for termination from your committee, at this time." Your letter further reminds the committees "that until termination is authorized, your reporting requirements under 2 U.S.C. § 434 continue."

On behalf of the Delegate Committees, I respectfully suggest that neither Section 434, Section 433(d) nor 11 C.F.R. § 102.3 supports your contention that continued reporting is required by the Delegate Committees until such time as the Commission approves requests for termination. I am unaware of any authority which supports the Commission's apparent position that its authorization is necessary for the termination of a political committee, where that committee "no longer receive[s] any contributions or make[s] any disbursements that would otherwise qualify it as a political committee" and where that committee "has no outstanding debts and obligations." 11 C.F.R. § 102.3(a). Therefore, there appears to be no legal basis for your assertion that the Delegate Committees, which no longer conduct any activities, are required to report to the Commission pursuant to Section 434 until such time as their termination is "approved" by the Commission.

Accordingly, until such time as the Commission explains by what authority it can continue to compel inactive political committees to file reports pursuant to Section 434, the Delegate Committees presently intend to file the appropriate termination reports on the appropriate FEC Forms in accordance with 11 C.F.R. § 102.3, or have already done

3504050014437

so in certain instances. Based upon the express provisions of Sections 433(d) and 434 of Title 2, and 11 C.F.R. § 102.3 promulgated pursuant thereto, the Delegate Committees respectfully submit that they are not required, nor do they presently intend, to file any additional quarterly reports with the Commission, as such is not required by any of the aforesaid provisions. Please advise me of the Commission's position regarding this matter and whether it has or will reconsider the position expressed in your letter of May 16. Thank you.

Very truly yours,

Michael D. Sher

Michael D. Sher

MDS:ji

cc: Charles N. Steele, Esq.

3504050143

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1704

NAME OF COUNSEL: Michael D. Sher, Esquire

ADDRESS: Friedman & Koven
208 S. LaSalle Street, Suite 900
Chicago, Illinois 60604

TELEPHONE: (312) 269-9605

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.

June 4, 1984
Date

Jean M. Foran
Signature

RESPONDENT'S NAME: Eleventh District (Illinois) Mondale Delegate Committee
Jean M. Foran

ADDRESS: 6156 N. Knox Avenue
Chicago, Illinois 60646

HOME PHONE: (312) 736-8370

BUSINESS PHONE: (312) 368-8330

3504050143 9

FEC
84 JUN 4 AM 9:36

LAW OFFICES
FRIEDMAN & KOVEN
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
208 SOUTH LA SALLE STREET
CHICAGO, ILLINOIS 60604
(312) 346-6500
CABLE ADDRESS "FREEZOR"
TELEX 254083

MICHAEL D. SHER
DIRECT TELEPHONE NUMBER
(312) 922-9605

June 1, 1984

FEDERAL EXPRESS

Charles N. Steele, Esq.
General Counsel
Federal Election Commission
1325 K Street, N. W.
Washington, DC 20463

Re: MUR 1667 / Response of Delegates for Mondale Committee - Twenty-First Congressional District (Illinois) and Eleventh District (Illinois) Mondale Delegate Committee

Dear Mr. Steele:

This letter is submitted to the Federal Election Commission (the "Commission") on behalf of the above-referenced Mondale Delegate Committees from the State of Illinois (the "Respondent Committees" or the "Committees") in response to the Complaint and supplemental submissions filed with the Commission by Americans With Hart, Inc. ("Complainant"). As and for their response to the Complaint and supplemental submissions, the Respondent Committees adopt and incorporate by reference herein the Consolidated Response of Mondale Delegate Committees from the Third, Seventh, Ninth, Fourteenth, Seventeenth, Twentieth and Twenty-Second Districts (Illinois), dated May 25, 1984, which has been filed previously with the Commission in MUR 1667.

Further responding to the Complaint, the Respondent Committees direct the Commission's attention to 2 U.S.C. § 437g(a)(1) and 11 C.F.R. § 111.4 promulgated thereunder, which set forth the required contents of any complaint filed with the Commission, which requirements must be met before the Commission may take any action on such complaint. Measured against those clearly articulated requirements, the Complaint filed in this proceeding is insufficient insofar as the Commission believes it to be directed against the Respondent Committees, and other unidentified delegate committees, which are not specifically named or identified in the Complaint. The Complaint does not "clearly identify as a respondent" either of the Respondent Committees nor does the Complaint contain the requisite allegations of fact with respect to the Respondent Committees. 11 C.F.R. § 111.4(d)(1) and (2). Accordingly, the Commission should enter an order dismissing the Complaint against the Respondent Committees based upon the Complaint's failure to meet the clear requirements of Section 111.4.

Additionally, the Commission should conclude that the Respondent Committees are not "affiliated" committees and that their expenditures were proper and not in any

3504050144

way allocable to Mondale For President, Inc. for the reasons set forth in the aforementioned Consolidated Response dated May 25, 1984. Therefore, the Commission should dismiss the Complaint against the Respondent Committees for the additional reasons set forth in the aforesaid Consolidated Response.

Respectfully submitted,

DELEGATES FOR MONDALE
COMMITTEE - TWENTY-FIRST
CONGRESSIONAL DISTRICT (ILLINOIS)

ELEVENTH DISTRICT (ILLINOIS)
MONDALE DELEGATE COMMITTEE

By Michael D. Sher
Michael D. Sher, Counsel for
Respondent Committees

Friedman & Koven
208 South LaSalle Street
Chicago, IL 60604
312/346-8500

MDS:ji

3504050144 2

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84 JUN 4 AM 9:35

LAW OFFICES
FRIEDMAN & KOVEN
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
208 SOUTH LA SALLE STREET
CHICAGO, ILLINOIS 60604

(312) 348-8500
CABLE ADDRESS "FREEZOR"
TELEX 254083

MICHAEL D. SHER
DIRECT TELEPHONE NUMBER
(312) 986-0605

114th Dist

MUR 1667
Mem.

June 1, 1984

FEDERAL EXPRESS

Charles N. Steele, Esq.
General Counsel
Federal Election Commission
1325 K Street, N. W.
Washington, DC 20463

Re: MUR 1667 / Delegates for Mondale Committee
- Twenty-First Congressional District (Illinois) and
Eleventh District (Illinois) Mondale Delegate Committee

Dear Mr. Steele:

Enclosed are the Statements of Designation of Counsel submitted by the Delegates for Mondale - Twenty-First Congressional District (Illinois) and Eleventh District (Illinois) Mondale Delegate Committee which designate me as counsel for said delegate committees in the above-referenced proceeding. By letter of even date herewith, I have responded to the Complaint filed in this proceeding on behalf of those delegate committees.

Very truly yours,

Michael D. Sher

Michael D. Sher

MDS:ji

Enclosures

3504014443

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1667

NAME OF COUNSEL: Michael D. Sher, Esquire

ADDRESS: Friedman & Koven
208 S. LaSalle Street, Suite 900
Chicago, Illinois 60604

TELEPHONE: (312) 269-9605

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 29, 1984
Date

Jean M. Foran
Signature

RESPONDENT'S NAME: Eleventh District (Illinois) Mondale Delegate Committee
Jean M. Foran

ADDRESS: 6156 N. Knox Avenue
Chicago, Illinois 60646

HOME PHONE: (312) 736-8370

BUSINESS PHONE: (312) 368-8330

3504014444

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Jean M. Foran, Treausrer
Eleventh District Mondale
Delegate Committee
6156 N. Knox
Chicago, IL 60646

Re: MUR 1667

Dear Ms. Foran:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

3504014

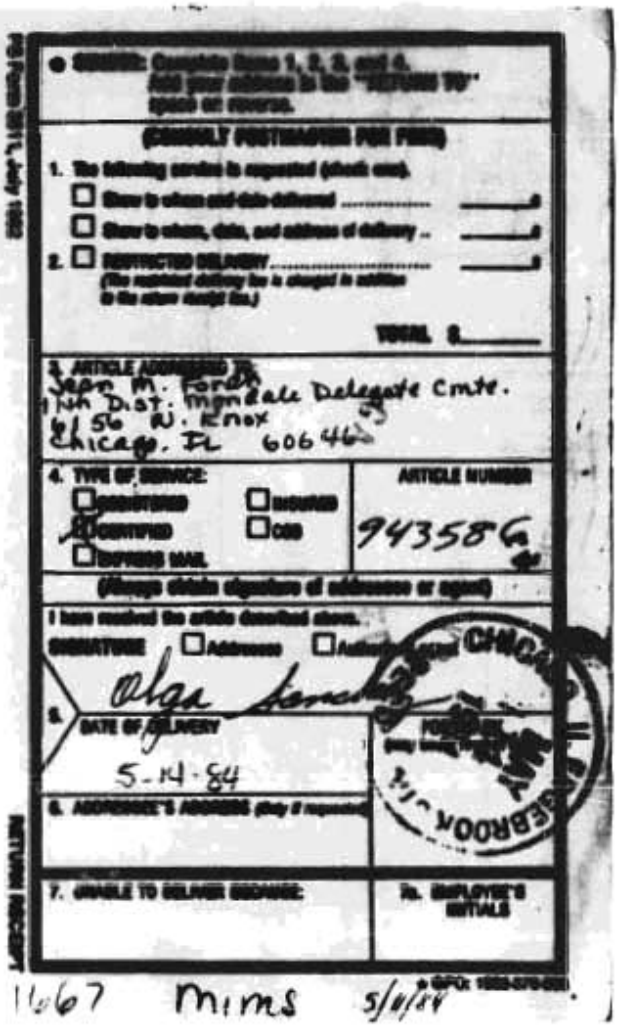
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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



3 5 0 4 0 5 0 1 4 4 6

3 5 0 4 0 5 0 1 4 4 7

COHON, RAIZES & R[illegible]AL
208 South La Salle Street, Suite 1860 • Chicago, Illinois 60604 • (312) 726-2252

FEC
Gen 3791
84 JUN 25 P1:12

TO Federal Election Commission
Washington D.C. 20463

DATE 6-21-84

SUBJECT Re MUR 1703
Response of 10th District
Republican Delegate Committee
(Illinois)

Gentlemen

Please be advised that the 10th District Republican Delegate Committee has previously filed a response to the Complaint Captioned MUR 1667. Please be advised that our response to the current Complaint would be the same as filed in case MUR 1667. Enclosed please find a copy of the substantive portion of said response. Please refer to previous filing for reference to exhibits.

Please advise us to what the Commission will allow the filing of our Termination Report.

10TH DISTRICT REPUBLICAN
DELEGATE COMMITTEE
By Elliott O Hamilton
TREASURER.

Form # MLS-N72 © Wheeler Group Inc. 1982

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COHON, RAIZES & REGAL

208 South La Salle Street, Suite 1860 • Chicago, Illinois 60604 • (312) 726-2252

[redacted]

TO Federal Election Commission
Washington D.C. 20463

DATE 6-21-84

SUBJECT re MUR 1705
Response of 10th District
Democratic Committee
(Illinois)

Gentlemen

Please be advised that the 10th District Democratic Committee has previously filed a response to the Complaint Captioned MUR 1705. Please be advised that our response to the instant Complaint would be the same as filed in MUR 1705. Enclosed please find a copy of the facsimile Telecopy of said response. Please refer to previous filing for reference to exhibits.

Please advise us if the Commission will allow the filing of our Responsive Papers.

10th DISTRICT DEMOCRATIC
REPUBLICAN COMMITTEE

By: [redacted]
Treasurer

Form #MLS 5/72 © Wheeler Group Inc. 1982

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84 MAY 30 A10:07

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of the Complaint of American With Hart, Inc. Complainant, - against - Mondale For President Committee, Inc. Respondent.	Case No. MUR 1667

84 MAY 30 A12:27

RESPONSE OF TENTH DISTRICT MONDALE DELEGATE COMMITTEE TO COMPLAINT

Now comes Elliott D. Hartstein as Treasurer of the Tenth District Mondale Delegate Committee and in response to the Complaint filed with the Commission states as follows:

1. Upon initiation of the Tenth District Mondale Delegate Committee, he filed a Statement of Organization as required by law. A copy of same is attached hereto as Exhibit A and made a part hereof.

2. A proper report as required by law for the twelfth day preceding the primary was prepared and to the best of his knowledge received by the Federal Election Commission. A copy of said report is attached hereto as Exhibit B and made a part hereof.

3. A proper report as required by law to be filed on April 15, 1984 was prepared and filed with the Federal Election

3504014449

Commission. A copy of said report is attached hereto as Exhibit C and made a part hereof.

4. That the funds received by the Committee were generally small contributions from friends or acquaintances of the delegates with the sole exception of one transfer of $250.00 from another Mondale Delegate Committee. The largest deposits received by the Committee were loans advanced by two of the Tenth District Delegate candidates, namely, $750.00 from Eugenia Chapman and $500.00 from Daniel Pierce, plus a recent $200.00 contribution from Mondale Alternate Delegate candidate Carolyn Kleamenakis. True and correct copies of all checks received by the Committee are attached hereto as Group Exhibit D.

5. The sole expenditure of the Tenth District Mondale Delegate Committee, with the exception of nominal checking account service charges, was for campaign literature which was distributed to the delegates and their volunteers to promote their candidacies. A sample copy of said literature is attached hereto as Exhibit E and made a part hereof. A copy of the invoice for said literature and a copy of the check used for payment is attached hereto as Exhibit F and made a part hereof.

6. A copy of the proposed Termination Report of the Tenth District Mondale Delegate Committee as prepared in accordance with the rules of the Federal Election Committee is attached hereto as Exhibit G and made a part hereof.

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7. To the best of my knowledge and belief the Tenth District Mondale Delegate Committee has fully complied with all laws and regulations relating to such committees.

WHEREFORE, Elliott D. Hartstein, as Treasurer of the Tenth District Mondale Delegate Committee prays as follows:

A. That any Complaint filed against the Tenth District Mondale Delegate Committee be dismissed.

B. That the Tenth District Mondale Delegate Committee be given leave to file its Termination Report instanter.

TENTH DISTRICT MONDALE
DELEGATE COMMITTEE

By: Elliott D Hartstein as treasurer
Elliott D. Hartstein

VERIFICATION

STATE OF ILLINOIS)
) ss.
COUNTY OF COOK)

ELLIOTT D. HARTSTEIN, being first duly sworn, states under oath that he is the Treasurer of the Tenth District Mondale

3504050I451

Delegate Committee and that he has prepared and reviewed the foregoing Response and that the answers contained therein are true and correct to the best of his knowledge and belief.

Elliott D. Hartstein

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

Notary Public

3504050014452

COHON, RAIZES & REGAL
[illegible] LA SALLE STREET, SUITE 1660
CHICAGO, ILLINOIS 60604

[illegible]VED AT THE FED

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Return Receipt Requested

CERTIFIED
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84 MAY 30 AM 8:07
GC #3375

LAW OFFICES
COHON, RAIZES & REGAL
208 SOUTH LA SALLE STREET - SUITE 1860
CHICAGO, ILLINOIS 60604
TELEPHONE (312) 726-2252

JACK A. COHON (1905-1968)
MAURICE P. RAIZES
SEYMOUR I. REGAL
GERALD D. CHIBB
ELLIOTT D. HARTSTEIN
JEFFREY M. BRICKMAN
BRUCE J. WALDMAN
CORNELIUS P. BROWN
LINDA S. KAGAN

IN REPLY PLEASE
REFER TO FILE NUMBER:

MUR 1667
Memo

May 25, 1984

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

Re: MUR 1667

Gentlemen:

I am pleased to enclose herewith the response of the Tenth District Mondale Delegate Committee to the above referenced Complaint. I have also enclosed herewith a copy of my proposed Termination Report for the Committee and would ask for leave to file same instanter.

If any further information is needed please feel free to contact the undersigned.

TENTH DISTRICT MONDALE
DELEGATE COMMITTEE

Elliott D. Hartstein

EDH;hcd
Enclosures

Elliott D. Hartstein,
Treasurer

P. S. I would appreciate your returning a stamped copy of the Response in the self-addressed, stamped envelope.

3504031454

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84 MAY 30 AM 10:07

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of the Complaint of American With Hart, Inc. Complainant, - against - Mondale For President Committee, Inc. Respondent.	Case No. MUR 1667

RESPONSE OF TENTH DISTRICT MONDALE DELEGATE COMMITTEE TO COMPLAINT

Now comes Elliott D. Hartstein as Treasurer of the Tenth District Mondale Delegate Committee and in response to the Complaint filed with the Commission states as follows:

1. Upon initiation of the Tenth District Mondale Delegate Committee, he filed a Statement of Organization as required by law. A copy of same is attached hereto as Exhibit A and made a part hereof.

2. A proper report as required by law for the twelfth day preceding the primary was prepared and to the best of his knowledge received by the Federal Election Commission. A copy of said report is attached hereto as Exhibit B and made a part hereof.

3. A proper report as required by law to be filed on April 15, 1984 was prepared and filed with the Federal Election

3504050145

Commission. A copy of said report is attached hereto as Exhibit C and made a part hereof.

4. That the funds received by the Committee were generally small contributions from friends or acquaintances of the delegates with the sole exception of one transfer of $250.00 from another Mondale Delegate Committee. The largest deposits received by the Committee were loans advanced by two of the Tenth District Delegate candidates, namely, $750.00 from Eugenia Chapman and $500.00 from Daniel Pierce, plus a recent $200.00 contribution from Mondale Alternate Delegate candidate Carolyn Kleamenakis. True and correct copies of all checks received by the Committee are attached hereto as Group Exhibit D.

5. The sole expenditure of the Tenth District Mondale Delegate Committee, with the exception of nominal checking account service charges, was for campaign literature which was distributed to the delegates and their volunteers to promote their candidacies. A sample copy of said literature is attached hereto as Exhibit E and made a part hereof. A copy of the invoice for said literature and a copy of the check used for payment is attached hereto as Exhibit F and made a part hereof.

6. A copy of the proposed Termination Report of the Tenth District Mondale Delegate Committee as prepared in accordance with the rules of the Federal Election Committee is attached hereto as Exhibit G and made a part hereof.

3504014356

7. To the best of my knowledge and belief the Tenth District Mondale Delegate Committee has fully complied with all laws and regulations relating to such committees.

WHEREFORE, Elliott D. Hartstein, as Treasurer of the Tenth District Mondale Delegate Committee prays as follows:

A. That any Complaint filed against the Tenth District Mondale Delegate Committee be dismissed.

B. That the Tenth District Mondale Delegate Committee be given leave to file its Termination Report instanter.

TENTH DISTRICT MONDALE
DELEGATE COMMITTEE

By: Elliott D. Hartstein as Treasurer
Elliott D. Hartstein

VERIFICATION

STATE OF ILLINOIS)
) ss.
COUNTY OF COOK)

ELLIOTT D. HARTSTEIN, being first duly sworn, states under oath that he is the Treasurer of the Tenth District Mondale

3504050014457

Delegate Committee and that he has prepared and reviewed the foregoing Response and that the answers contained therein are true and correct to the best of his knowledge and belief.

Elliott D. Hartstein

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

Notary Public

3504050014458

STATEMENT OF ORGANIZATION

(See reverse side for instructions)

1. (a) Name of Committee (In Full) ☐ Check if name or address is changed.	2. Date
10th District Mondale Delegate Committee	January 24, 1984
(b) Address (Number and Street)	3. FEC Identification Number
908 Providence Lane	
(c) City, State and ZIP Code	4. Is this an amended Statement? ☐ YES ☒ NO
Buffalo Grove, Illinois 60090	

5. TYPE OF COMMITTEE (check one):

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

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

Name of Candidate	Candidate Party Affiliation	Office Sought	State/District

☒ (c) This committee supports/opposes only one candidate Walter F. Mondale (name of candidate) and is NOT an authorized committee.

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

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

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

6. Name of Any Connected Organization or Affiliated Committee	Mailing Address and ZIP Code	Relationship
"NONE"		

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

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

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

Full Name	Mailing Address and ZIP Code	Title or Position
ELLIOTT D. HARTSTEIN	208 South La Salle, Suite 1860 Chicago, Illinois 60604	(312)726-2252 Treasurer

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

Full Name	Mailing Address and ZIP Code	Title or Position
ELLIOTT D. HARTSTEIN	208 South La Salle, Suite 1860 Chicago, Illinois 60604	(312)726-2252 Treasurer

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

Name of Bank, Depository, etc.	Mailing Address and ZIP Code
CONTINENTAL ILLINOIS NATIONAL BANK AND TRUST COMPANY OF CHICAGO	231 South La Salle Chicago, Illinois 60697

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

ELLIOTT D. HARTSTEIN — Type or Print Name of Treasurer

Elliott D. Hartstein — SIGNATURE OF TREASURER

Jan. 24, 1984 — Date

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

For further information contact: Federal Election Commission, Toll Free 800-424-9530, Local 202-523-4068

FEC FORM 1 (3/80)

EXHIBIT A

35040501459

REPORT OF RECEIPTS AND DISBURSEMENTS

For a [illegible] Committee Other Than an Authorized C[illegible]ittee

(Summary Page)

ALIGN AREA

ALIGN AREA

10th District Mondale
Delegate Committee

Address (Number and Street)

908 Providence Lane

City, State and ZIP Code

Buffalo Grove, Illinois 60090

☐ Check here if address is different than previously reported.

2. FEC Identification Number

C 00175836

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

4. TYPE OF REPORT (Check appropriate boxes)

(a) ☐ April 15 Quarterly Report ☐ October 15 Quarterly Report

☐ July 15 Quarterly Report ☐ January 31 Year End Report

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

☐ Monthly Report for _____

☒ Twelfth day report preceding Primary (Type of Election)

election on March 20 in the State of Illinois

☐ Thirtieth day report following the General Election

on _____ in the State of _____

☐ Termination Report

(b) Is this Report an Amendment?

☐ YES ☒ NO

35040501460

SUMMARY	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period 1-24-84 through 2-29-84		
6. (a) Cash on hand January 1, 19 84		$ 0
(b) Cash on Hand at Beginning of Reporting Period	$ 0	
(c) Total Receipts (From Line 18)	$ 1,610	$ 1,610
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ 1,610	$ 1,610
7. Total Disbursements (from Line 28)	$ 1,333.75	$ 1,333.75
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 276.25	$ 276.25
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)	$ None	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	$ 1,250	

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

Elliott D. Hartstein, Treasurer

Type or Print Name of Treasurer

Elliott D. Hartstein by Proxy 3-1-84

SIGNATURE OF TREASURER Date

For further information contact
Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4068

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

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

C	0	0	1	7	5	8	3	6

FEC FORM 3X (3/80)

EXHIBIT B

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

Name of Committee (in Full)	Report Covering the Period	
10th District Mondale Delegate Committee	From: 1-24-84	To: 2-29-84

	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date	
I. RECEIPTS			
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees	110	110	11(a)
(Memo Entry Unitemized $ 110.00)			
(b) Political Party Committees			11(b)
(c) Other Political Committees			11(c)
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c))	$110	$110	11(d)
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES	$250	$250	12
13. ALL LOANS RECEIVED	$1,250	$1,250	13
14. LOAN REPAYMENTS RECEIVED			14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)			15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			16
17. OTHER RECEIPTS (Dividends, Interest, etc.)			17
18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)	$1,610	$1,610	18
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES	$1,333.75	$1,333.75	19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES			20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			21
22. INDEPENDENT EXPENDITURES (use Schedule E)			22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. § 441 a(d)) (Use Schedule F)			23
24. LOAN REPAYMENTS MADE			24
25. LOANS MADE			25
26. REFUNDS OF CONTRIBUTIONS TO			
(a) Individuals/Persons Other Than Political Committees			26(a)
(b) Political Party Committees			26(b)
(c) Other Political Committees			26(c)
(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))			26(d)
27. OTHER DISBURSEMENTS			27
28. TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	$1,333.75	$1,333.75	28
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)	110	110	29
30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)			30
31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)	110	110	31
32. TOTAL OPERATING EXPENDITURES from Line 19	$1,333.75	$1,333.75	32
33. OFFSETS TO OPERATING EXPENDITURES from Line 15			33
34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)	$1,333.75	$1,333.75	34

35040146

SCHEDULE A **ITEMIZED RECEIPTS**

Page 1 of 1 for LINE NUMBER 11
(Use separate schedule(s) for each category of the Detailed Summary Page)

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

Name of Committee (in Full)
10th District Mondale Delegate Committee

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Occupation	Date (month, day, year)	Amount of Each Receipt this Period
Eugenia S. Chapman 10 S. Princeton Ct. Arlington Heights, IL 60005	State of Illinois Attorney General's Office	Administrator	2/13/84	$750*
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—$750			

B. Full Name, Mailing Address and ZIP Code	Name of Employer	Occupation	Date (month, day, year)	Amount of Each Receipt This Period
Daniel M. Pierce One IBM Plaza - Rm. 3700 Chicago, IL 60611	Altheimer & Gray State of Illinois	Attorney / State Representative	2/10/84	$500*
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—$500			

C. Full Name, Mailing Address and ZIP Code	Name of Employer	Occupation	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Aggregate Year-to-Date—$			

D. Full Name, Mailing Address and ZIP Code	Name of Employer	Occupation	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—$			

E. Full Name, Mailing Address and ZIP Code	Name of Employer	Occupation	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—$			

F. Full Name, Mailing Address and ZIP Code	Name of Employer	Occupation	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—$			

G. Full Name, Mailing Address and ZIP Code	Name of Employer	Occupation	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—$			

SUBTOTAL of Receipts This Page (optional)	$1,250
TOTAL This Period (last page this line number only)	$1,250

*See Schedule C

3504501462

SCHEDULE A

ITEMIZED RECEIPTS

Page ___ of ___ for
LINE NUMBER 12
Also enter on Schedule for each category of the Detailed Summary Page

commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (In Full)
10th District Mondale Delegate Committee

A. Full Name, Mailing Address and ZIP Code 7th C.D. Delegate for Mondale One IBM Plaza, Suite 4700 Chicago, IL 60611	Name of Employer n/a	Date (month, day, year) 2-24-84	Amount of Each Receipt this Period $250
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation		
	Aggregate Year-to-Date—$ 250		
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation		
	Aggregate Year-to-Date—$		
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Occupation		
	Aggregate Year-to-Date—$		
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation		
	Aggregate Year-to-Date—$		
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation		
	Aggregate Year-to-Date—$		
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation		
	Aggregate Year-to-Date—$		
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Occupation		
	Aggregate Year-to-Date—$		
SUBTOTAL of Receipts This Page (optional)			$250
TOTAL This Period (last page this line number only)			$250

85040501463

SCHEDULE B

ITEMIZED DISBURSEMENTS

Page 1 of 1 for LINE NUMBER 19
(Use separate schedule(s) for each category of the Detailed Summary Page)

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

Name of Committee (in Full)

10th District Mondale Delegate Committee

A. Full Name, Mailing Address and ZIP Code Progress Printing 3324 S. Halsted Chicago, Illinois	Purpose of Disbursement Literature Printing Disbursement for: ☒Primary ☐General ☐ Other (specify):	Date (month, day, year) 2/23/84	Amount of Each Disbursement This Period $1,333.75
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐Primary ☐General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐Primary ☐General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐Primary ☐General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐Primary ☐General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐Primary ☐General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐Primary ☐General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐Primary ☐General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐Primary ☐General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			$1,333.75
TOTAL This Period (last page this line number only)			$1,333.75

35040501461

SCHEDULE C
(Revised 3/89)

LOANS

Page 1 of 1 for LINE NUMBER 13
(Use separate schedule for each numbered line)

Name of Committee (In Full)

A. Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Cumulative Payment To Date	Balance Outstanding at Close of This Period
Eugenia S. Chapman 10 S. Princeton Ct. Arlington Heights, IL 60005	$750	-	$750

Election: ○ Primary ○ General ○ Other (specify):

Terms: Date Incurred 2-13-84 Date Due none Interest Rate none % (apr) ○ Secured

List All Endorsers or Guarantors (if any) to Item A

1. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation / Amount Guaranteed Outstanding $
2. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation / Amount Guaranteed Outstanding $
3. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation / Amount Guaranteed Outstanding $

B. Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Cumulative Payment To Date	Balance Outstanding at Close of This Period
Daniel M. Pierce One IBM Plaza - Rm. 3700 Chicago, IL 60611	$500	0	$500

Election: ☒ Primary ○ General ○ Other (specify):

Terms: Date Incurred 2-13-84 Date Due none Interest Rate none % (apr) ○ Secured

List All Endorsers or Guarantors (if any) to Item B

1. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation / Amount Guaranteed Outstanding $
2. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation / Amount Guaranteed Outstanding $
3. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation / Amount Guaranteed Outstanding $

SUBTOTALS This Period This Page (optional)	$1,250
TOTALS This Period (last page of this line only)	$1,250

Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.

85040501465

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

(Summary Page)

ALIGN AREA | ALIGN AREA

1. Name of Committee (In Full)

10th District Mondale
Delegate Committee

Address (Number and Street)

908 Providence Lane

City, State and ZIP Code

Buffalo Grove, Illinois 60090

☐ Check here if address is different than previously reported.

2. FEC Identification Number

C 00175836

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

4. TYPE OF REPORT (Check appropriate boxes)

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

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

SUMMARY	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period 1/24/84 through 4/15/84		
6. (a) Cash on hand January 1, 19 84		$ 0
(b) Cash on Hand at Beginning of Reporting Period	$	
(c) Total Receipts (from Line 18)	$ 1,760	$1,760
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ 1,760	$1,760
7. Total Disbursements (from Line 28)	$ 1,333.75	$1,333.75
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 426.25	$ 426.25
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)	$ None	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	$ 1,250	

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

Elliott D. Hartstein, Treasurer
Type or Print Name of Treasurer

SIGNATURE OF TREASURER

4/13/84
Date

For further information contact:
Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4068

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

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

FEC FORM 3X (3/80)

EXHIBIT C

35040501466

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

Name of Committee (in Full): 10th District Mondale Delegate Committee

Report Covering the Period: From: 1/24/84 To: 4/15/84

	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date	
I. RECEIPTS			
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees. (Memo Entry Unitemized $260.00)	260	260	11(a)
(b) Political Party Committees			11(b)
(c) Other Political Committees			11(c)
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c))	260	260	11(d)
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES	250	250	12
13. ALL LOANS RECEIVED	$1,250	$1,250	13
14. LOAN REPAYMENTS RECEIVED			14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)			15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			16
17. OTHER RECEIPTS (Dividends, Interest, etc.)			17
18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)	1,760	1,760	18
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES	1,333.75	1,333.75	19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES			20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			21
22. INDEPENDENT EXPENDITURES (use Schedule E)			22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. § 441 a(d)) (Use Schedule F)			23
24. LOAN REPAYMENTS MADE			24
25. LOANS MADE			25
26. REFUNDS OF CONTRIBUTIONS TO			
(a) Individuals/Persons Other Than Political Committees			26(a)
(b) Political Party Committees			26(b)
(c) Other Political Committees			26(c)
(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))			26(d)
27. OTHER DISBURSEMENTS			27
28. TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	1,333.75	1,333.75	28
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)	260	260	29
30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)			30
31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)	260	260	31
32. TOTAL OPERATING EXPENDITURES from Line 19	1,333.75	1,333.75	32
33. OFFSETS TO OPERATING EXPENDITURES from Line 15			33
34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)	1,333.75	1,333.75	34

35040-1457

Page 1 of 1 for LINE NUMBER 11
(Use separate schedule(s) for each category of the Detailed Summary Page)

SCHEDULE A — ITEMIZED RECEIPTS

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

Name of Committee (In Full)
10th District Mondale Delegate Committee

	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
A. Full Name, Mailing Address and ZIP Code Eugenia S. Chapman 10 S. Princeton Ct. Arlington Heights, IL 60005	State of Illinois Attorney General's Office	2/13/84	$750*
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation: Administrator		
	Aggregate Year-to-Date—$750		
B. Full Name, Mailing Address and ZIP Code Daniel M. Pierce One IBM Plaza - Rm. 3700 Chicago, IL 60611	Name of Employer: Altheimer & Gray State of Illinois	Date (month, day, year): 2/10/84	Amount of Each Receipt This Period: $500*
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation: Attorney / State Representative		
	Aggregate Year-to-Date—$500		
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation		
	Aggregate Year-to-Date—$		
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation		
	Aggregate Year-to-Date—$		
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation		
	Aggregate Year-to-Date—$		
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation		
	Aggregate Year-to-Date—$		
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation		
	Aggregate Year-to-Date—$		
SUBTOTAL of Receipts This Page (optional)			$1,250
TOTAL This Period (last page this line number only)			$1,250

*See Schedule C

25240301468

SCHEDULE A **ITEMIZED RECEIPTS**

Page 1 of 1 for LINE NUMBER 12
(Use separate schedule(s) for each category of the Detailed Summary Page)

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

Name of Committee (In Full)
10th District Mondale Delegate Committee

A. Full Name, Mailing Address and ZIP Code 7th C.D. Delegate for Mondale One IBM Plaza, Suite 4700 Chicago, IL 60611 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer n/a Occupation Aggregate Year-to-Date—$ 250	Date (month, day, year) 2-24-84	Amount of Each Receipt this Period $250
B. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
C. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
D. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
E. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
F. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
G. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
SUBTOTAL of Receipts This Page (optional)			$250
TOTAL This Period (last page this line number only)			$250

35040501459

SCHEDULE B

ITEMIZED DISBURSEMENTS

Page 1 of 1 for
LINE NUMBER 19
(Use separate schedule(s) for each category of the Detailed Summary Page)

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Name of Committee (in Full)

10th District Mondale Delegate Committee

A. Full Name, Mailing Address and ZIP Code Progress Printing 3324 S. Halsted Chicago, Illinois	Purpose of Disbursement Literature Printing Disbursement for: ☒Primary ☐General ☐ Other (specify):	Date (month, day, year) 2/23/84	Amount of Each Disbursement This Period $1,333.75
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐Primary ☐General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐Primary ☐General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐Primary ☐General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐Primary ☐General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐Primary ☐General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐Primary ☐General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐Primary ☐General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐Primary ☐General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			$1,333.75
TOTAL This Period (last page this line number only)			$1,333.75

35040501470

SCHEDULE C
(Revised 3/80)

LOANS

Page 1 of 1 for LINE NUMBER 11
(Use separate schedule for each numbered line)

Name of Committee (In Full)

A. Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Cumulative Payment To Date	Balance Outstanding at Close of This Period
Eugenia S. Chapman 10 S. Princeton Ct. Arlington Heights, IL 60005	$750	-	$750

Election: ☐ Primary ☐ General ☐ Other (specify):

Terms: Date Incurred 2-13-84 Date Due none Interest Rate none % (apr) ☐ Secured

List All Endorsers or Guarantors (if any) to Item A

1. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding: $
2. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding: $
3. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding: $

B. Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Cumulative Payment To Date	Balance Outstanding at Close of This Period
Daniel M. Pierce One IBM Plaza - Rm. 3700 Chicago, IL 60611	$500	0	$500

Election: ☒ Primary ☐ General ☐ Other (specify):

Terms: Date Incurred 2-13-84 Date Due none Interest Rate none % (apr) ☐ Secured

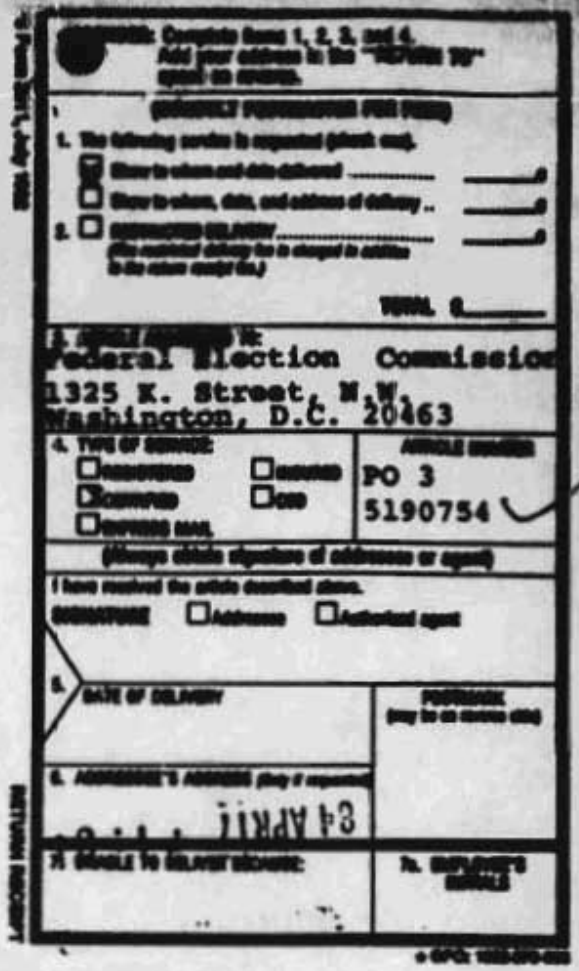
List All Endorsers or Guarantors (if any) to Item B

1. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding: $
2. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding: $
3. Full Name, Mailing Address and ZIP Code	Name of Employer Occupation Amount Guaranteed Outstanding: $

SUBTOTALS This Period This Page (optional)	$1,250
TOTALS This Period (last page in this line only)	$1,250

Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.

35040501471



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

PO 3
5190754

84 APRIL

3504050501472

501

ANDREW KLEAMENAKIS
CAROLYN KLEAMENAKIS
90 BALMORAL PH. 312-446-5380
NORTHFIELD, ILL. 60093

5-15 1984

PAY TO THE ORDER OF 18th Dist. Mondale Delegate Committee Jan 02

Two Hundred & [redacted] DOLLARS

Bank of Northfield
Northfield, Illinois 60093

FOR DONATION

Carolyn Kleamenakis

3504050014473

EXHIBIT D

PETER D. FISCHER
1825 N. LINCOLN PLAZA, APT. 2109
CHICAGO, ILL. 60614

677

April 15 19 84

Pay to the order of 10th District Meredith Delegate Comm. $ 100.00

One hundred and 00/100 Dollars

FIRST CHICAGO
The First National Bank of Chicago
Three First Banking Center

Peter Fischer

3504050147 4

BARBARA ANKLEY 7-82
ROGER ANKLEY
2645 EVERGREEN
WAUKEGAN, ILL. 60085

683

4-16 19 84

PAY TO THE ORDER OF 10TH DISTRICT MEREDITH DELEGATE COMM. 100.00

ONE HUNDRED & NO/100 DOLLARS

Citizens Bank

Roger K Ankley

ALMA CRAMER LIVERMORE
LEONE J. KREMBS

NUMBER 352

March 9 1984

PAY TO THE ORDER OF 10th District Mondale Delegate Committee $ 50.00

Fifty and 00/100 DOLLARS

The Evanston Bank
Telephone (312) 866-4600 Member FDIC
Main Street at Chicago Avenue, Evanston, IL 60202

Contribution

Alma Cramer Livermore

3504050147 5

EUGENE RAWHOOF
SPECIAL ACCOUNT
3814 EDINA BLVD.
ZION, ILL. 60099

3921

3/11 1987

PAY TO THE ORDER OF Otto Graf + Mundelein Deli Assn $ 100.00

One hundred and 00/100 DOLLARS

BANK of WAUKEGAN
WAUKEGAN, ILLINOIS 60085

For

Eugene Rawhoof

⑈ 3504050147 6

003

American National Bank
and Trust Company of Chicago • Chicago, Illinois (60690)

DATE 2-24 1984

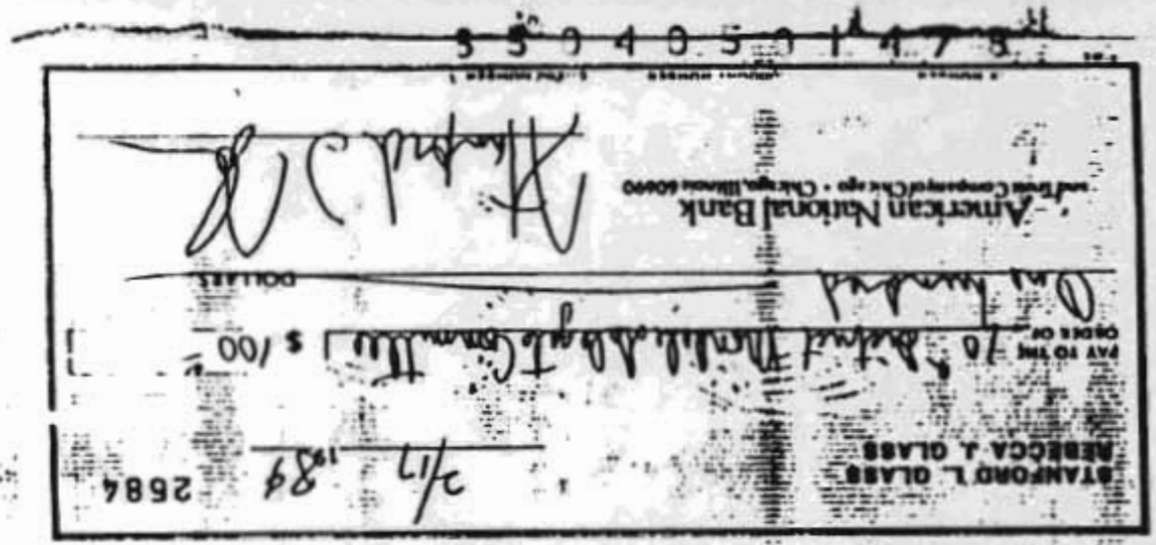
PAY TO THE ORDER OF 10th C.D. Delegates For Mondale $ 250.00

Two hundred fifty and no/100 DOLLARS

7th C.D. Delegates for mondale
1 IBM Plaza Suite 4703
Chicago, 60611

CHECK NUMBER BANK NUMBER ACCOUNT NUMBER W. Loyd
Treasurer

8504850147 7



HOLLEB & COFF, LTD.
ATTORNEYS AT LAW
ONE IBM PLAZA
SUITE 4040
CHICAGO, ILLINOIS 60611

CHICAGO
IL 1994
$2.20

Elliott Hertstein
Cohon
208 S. LaSalle - #1860
Chicago 60604

EUGENIA S. CHAPMAN
16 S. PRINCETON CT.
ARLINGTON HEIGHTS, ILL. 60005

163

Feb 13 1984

PAY TO THE ORDER OF 10th Dist Member Delegate Campaign Comm $ 750 00

Seven Hundred Fifty 00/100 DOLLARS

American National Bank
of Arlington Heights

Local

Eugenia S Chapman

DANIEL M. PIERCE
ONE IBM PLAZA, RM. 3700
CHICAGO, ILL. 60611

737

Feb 10, 1984

PAY TO THE ORDER OF 10th District Member Delegate Committee $ 500.00

Five Hundred and no /100 DOLLARS

FIRST CHICAGO
The First National Bank of Chicago
Chicago, Illinois 60670

FOR

Daniel M. Pierce

8504050147 9

ELLIOTT HARTSTEIN
JUDY HARTSTEIN
908 PROVIDENCE LANE 312/634-8465
BUFFALO GROVE, IL 60089

4441

1-24 19 84

PAY TO THE ORDER OF [illegible] $ 10.00

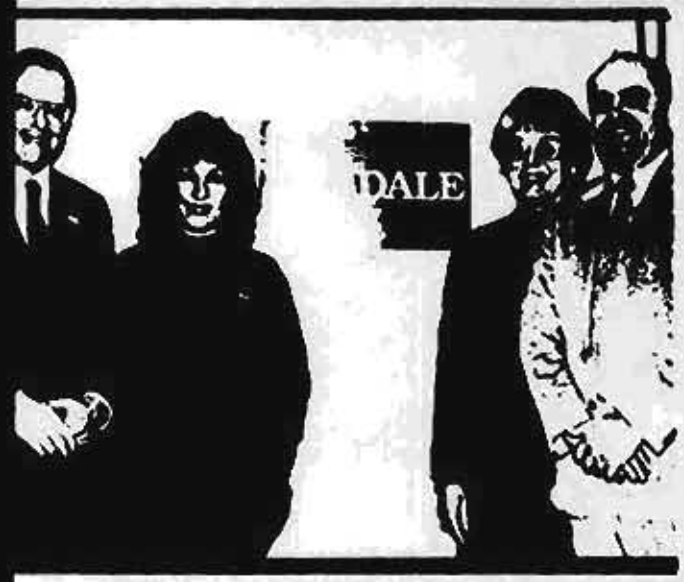
[illegible] DOLLARS

CONTINENTAL BANK

FOR [illegible]

Elliott Hartstein

950405014 90



Support the Delegates Who Support Mondale

The 10th District Mondale Slate

DANIEL M. PIERCE, State Representative for over 20 years, Chicago attorney, resides in Highland Park

EUGENIA S. CHAPMAN, Former State Representative and Congressional candidate; presently a Special Assistant to Attorney General Neil Hartigan and living in Arlington Heights

DONALD R. WEAKLEY, a resident of Waukegan where is a member of the City Council as well as a member of the International Brotherhood of Electrical Workers

EXHIBIT E

ale

CAROLYN KLEAMENAKIS, Attorney from Northfield, Candidate for State Representative

3504050148!

On March 20th Vote for WALTER MONDALE FOR PRESIDENT

AND THE MONDALE DELEGATES

(VOTE FOR 3)

- ☒ DANIEL M. PIERCE (MONDALE)
- ☒ EUGENIA S. CHAPMAN (MONDALE)
- ☒ DONALD R. WEAKLEY (MONDALE)

MONDALE ALTERNATE

(VOTE FOR 1)

- ☒ CAROLYN KLEAMENAKIS (MONDALE)

MONDALE

ILLINOIS FOR MONDALE

Chicago
30 W. Washington, #530
Chicago, IL 60602
(312) 368-9184

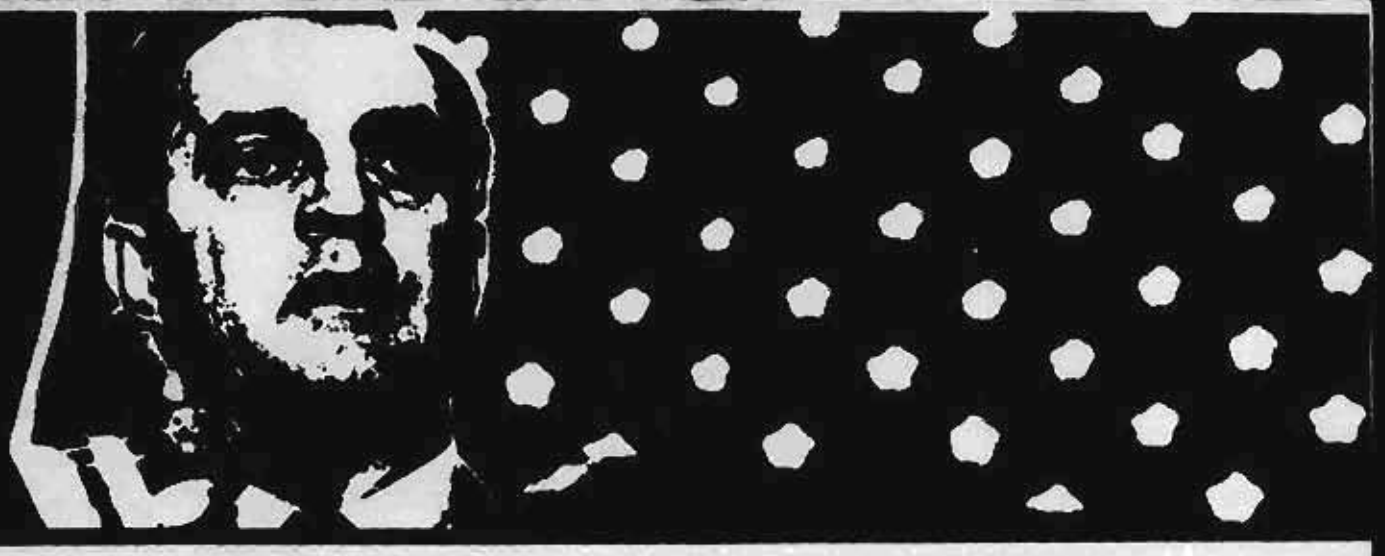
Springfield
601 N. First Street
Springfield, IL 62702
(217) 522-9850

Paid for by the 10th District Mondale Delegate Committee

WALTER MONDALE



THE EXPERIENCE TO KNOW WHAT WE NEED TO CHANGE... THE STRENGTH TO MAKE IT HAPPEN



A Competitive America

Walter Mondale wants to get our nation's competitive edge back. Our economy was once the strongest, most productive on earth. But today America's best jobs are being exported, basic industries are declining, farm products can't compete in world markets and small businesses are shut off from affordable credit.

Mondale believes we must **chop the Reagan deficits** to reduce interest rates; **fight for fair trade** so that America begins to get an even break against foreign competition; **revitalize our basic industries and infrastructure** to insure that "Made in America" once again means the best; **invest in people** to make this next generation of Americans the best-educated and trained in our history.





A Fair America

Mondale thinks its time to restore the basic American values of fairness, decency and opportunity to government policy. We need to **close the tax loopholes and catch the tax cheaters** so that every corporation and every individual pay their fair share; **enforce our civil rights laws** and redouble our efforts to gain **equal rights for women**—with a Constitutional Amendment to back it up; **protect Social Security and Medicare;** lighten the load on the hungry, the handicapped and the unemployed. Mondale will **fight for the average American** who is confronted with rising utility bills, tuition fees and interest rates, and bring an end to government of the rich, by the rich, for the rich.

A Safer World

Mondale will keep America strong and use that strength to wage peace and prevent war.

We need a President who sees the world as it really is; who understands that we should use force as a last, not a first resort; who recognizes the necessity of reducing the risk of nuclear war.

Mondale will be that President. He will **stabilize relations with the Soviets** by meeting them on the common ground of global survival; **maintain a strong defense,** while keeping the Pentagon in check; **work with our allies** while negotiating with our adversaries. Mondale will speak up for American principles by demonstrating that the United States not only stands tall, but stands by its values.



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Progress Printing Corporation
3324 South Halsted Street
Chicago, Illinois 60608

312/927-0123

INVOICE **B** 15176

EXHIBIT 4

10th District Mondale Delegate Committee

VOICE DATE 2-27-84	OUR ORDER NO. 7689	YOUR ORDER NO.	TERMS: NET 10 DAYS
QUANTITY	DESCRIPTION		PRICE
70,000	Brochures		$ 1333.75

PAID

3504050148 3

10 th District Mondale Delegate Committee

No. 001

Feb. 23 19 84 2-3/710

PAY TO THE ORDER OF Progress Printing $1,333.75

One Thousand Three Hundred Thirty-three and 75/100---------- DOLLARS

CONTINENTAL BANK

Elliott D Hirshstein
Treasurer

Re: Literature Printing :071000039: 78-86292

Received 2-23-84

Elliott D. Hirshstein

3504051484

REPORT OF RECEIPTS AND DISBURSEMENTS
For a [redacted] Committee Other Than an Authorized C[redacted]ittee

(Summary Page)

ALIGN AREA | | ALIGN AREA

1. Name of Committee (In Full)
10th District Mondale
Delegate Committee

Address (Number and Street)
908 Providence Lane

City, State and ZIP Code
Buffalo Grove, Illinois 60090

☐ Check here if address is different than previously reported.

2. FEC Identification Number
C 00175836

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

4. TYPE OF REPORT (Check appropriate block)

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

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

SUMMARY	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period 4-15-84 through 5-24-84		
6.(a) Cash on hand January 1, 19 84		$
(b) Cash on Hand at Beginning of Reporting Period	$ 426.25	
(c) Total Receipts (from Line 18)	$ 400.00	$ 2,160.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ 826.25	$ 2,160.00
7. Total Disbursements (from Line 28)	$ 826.25	$ 2,160.00
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ -0-	$ -0-
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)	$ None	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	$ 463.75 Deemed contribution by partie involved.	

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

Elliott D. Hartstein, Treasurer
Type or Print Name of Treasurer

Elliott D Hartstein
SIGNATURE OF TREASURER

5/24/84
Date

For further information contact
Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4068

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

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

FEC FORM 3X (3/80)

EXHIBIT G

3504001495

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

Name of Committee (in Full): 10th District Mondale Delegate Committee

Report Covering the Period: From: 4/15/84 To: 5/24/84

	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date	
I. RECEIPTS			
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees. (Memo Entry Unitemized $200.00)	$ 400.00	$ 660.00	11(a)
(b) Political Party Committees			11(b)
(c) Other Political Committees			11(c)
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c))	$ 400.00	$ 660.00	11(d)
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES	-0-	$ 250.00	12
13. ALL LOANS RECEIVED	-0-	$1,250.00	13
14. LOAN REPAYMENTS RECEIVED			14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)			15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			16
17. OTHER RECEIPTS (Dividends, Interest, etc.)			17
18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)	$2,160.00	$ 2,160.00	18
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES (Checking Acct. service charges)	$ 40.00	$ 1,373.75	19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES			20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			21
22. INDEPENDENT EXPENDITURES (use Schedule E)			22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. §441 a(d)) (Use Schedule F)			23
24. LOAN REPAYMENTS MADE	$ 786.25	$ 786.25	24
25. LOANS MADE			25
26. REFUNDS OF CONTRIBUTIONS TO			
(a) Individuals Persons Other Than Political Committees			26(a)
(b) Political Party Committees			26(b)
(c) Other Political Committees			26(c)
(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))			26(d)
27. OTHER DISBURSEMENTS			27
28. TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	$ 826.25	$2,160.00	28
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)	$ 400.00	$ 660.00	29
30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)			30
31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)	$ 400.00	$ 660.00	31
32. TOTAL OPERATING EXPENDITURES from Line 19	$ 40.00	$1,373.75	32
33. OFFSETS TO OPERATING EXPENDITURES from Line 15			33
34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)	$ 40.00	$1,373.75	34

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SCHEDULE A

ITEMIZED RECEIPTS

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

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

Name of Committee (in Full)
10th District Mondale Delegate Committee

A. Full Name, Mailing Address and ZIP Code Carolyn Kleamenakis 90 Balmoral Northfield, IL 60090 Receipt For ☐ Primary ☐ General X Other (specify) To help repay loans	Name of Employer Self Occupation Candidate for State Rep. Aggregate Year-to-Date-$ 200.00	Date (month, day, year) 5/23/84	Amount of Each Receipt this Period $200.00
B. Full Name, Mailing Address and ZIP Code Receipt For ☐ Primary ☐ General ☐ Other (specify)	Name of Employer Occupation Aggregate Year-to-Date-$	Date (month, day, year)	Amount of Each Receipt This Period
C. Full Name, Mailing Address and ZIP Code Receipt For ☐ Primary ☐ General ☐ Other (specify)	Name of Employer Occupation Aggregate Year-to-Date-$	Date (month, day, year)	Amount of Each Receipt This Period
D. Full Name, Mailing Address and ZIP Code Receipt For ☐ Primary ☐ General ☐ Other (specify)	Name of Employer Occupation Aggregate Year-to-Date-$	Date (month, day, year)	Amount of Each Receipt This Period
E. Full Name, Mailing Address and ZIP Code Receipt For ☐ Primary ☐ General ☐ Other (specify)	Name of Employer Occupation Aggregate Year-to-Date-$	Date (month, day, year)	Amount of Each Receipt This Period
F. Full Name, Mailing Address and ZIP Code Receipt For ☐ Primary ☐ General ☐ Other (specify)	Name of Employer Occupation Aggregate Year-to-Date-$	Date (month, day, year)	Amount of Each Receipt This Period
G. Full Name, Mailing Address and ZIP Code Receipt For ☐ Primary ☐ General ☐ Other (specify)	Name of Employer Occupation Aggregate Year-to-Date $	Date (month, day, year)	Amount of Each Receipt This Period
SUBTOTAL of Receipts This Page (optional)			$200.00
TOTAL This Period (last page this line number only)			$200.00

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SCHEDULE B

ITEMIZED DISBURSEMENTS

Page 1 of 1 for LINE NUMBER 19 or 21
(Use separate schedule(s) for each category of the Detailed Summary Page)

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

Name of Committee (in Full)

10th District Mondale Delegate Committee

A. Full Name, Mailing Address and ZIP Code Continental Illinois National Bank 231 South La Salle street Chicago, Illinois	Purpose of Disbursement Checking account services charges Disbursement for: ☐ Primary ☐ General ☒ Other (specify): Genl. Exp.	Date (month, day, year) Cumulative	Amount of Each Disbursement This Period $40.00
B. Full Name, Mailing Address and ZIP Code Daniel M. Pierce One IBM Plaza Chicago, IL 60111	Purpose of Disbursement Loan repayment Disbursement for: ☐ Primary ☐ General ☒ Other (specify) Loan Repymt.	Date (month, day, year) 5/24/84	Amount of Each Disbursement This Period $268.13
C. Full Name, Mailing Address and ZIP Code Eugenia Chapman 10 South Princeton Court Arlington Heights, IL	Purpose of Disbursement Loan repayment Disbursement for: ☐ Primary ☐ General ☒ Other (specify): Loan Repymt	Date (month, day, year) 5/24/84	Amount of Each Disbursement This Period $518.12
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			$826.25
TOTAL This Period (last page this line number only) 21			$826.25

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SCHEDULE C
(Revised 3/80)

LOANS

Page 1 of 1
LINE NUMBER 18
(Use separate schedules for each numbered line)

Name of Committee (in Full)
10th District Mondale Delegate Committee

A. Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Cumulative Payment To Date	Balance Outstanding at Close of This Period
Eugenia S. Chapman 10 S. Princeton Court Arlington Heights, IL 60005 Election: ☐Primary ☐General ☐Other (specify):	$750.00	$518.12 Accepted as pymt. in full	$231.88 Deemed contribution

Terms: Date Incurred 2/13/84 Date Due None Interest Rate None %(apr) ☐ Secured

List All Endorsers or Guarantors (if any) to Item A

1. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation / Amount Guaranteed Outstanding $
2. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation / Amount Guaranteed Outstanding $
3. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation / Amount Guaranteed Outstanding $

B. Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Cumulative Payment To Date	Balance Outstanding at Close of This Period
Daniel M. Pierce One IBM Plaza-Rm. 3700 Chicago, IL 60611 Election ☐Primary ☐General ☐Other (specify):	$500.00	$268.13 Accepted as pymt.in full	$231.87 Deemed contribution

Terms Date Incurred 2/13/84 Date Due None Interest Rate None %(apr) ☐ Secured

List All Endorsers or Guarantors (if any) to Item B

1. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation / Amount Guaranteed Outstanding $
2. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation / Amount Guaranteed Outstanding $
3. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation / Amount Guaranteed Outstanding $

SUBTOTALS This Period This Page (optional)	$463.75
TOTALS This Period (last page in this line only)	$463.75

Carry outstanding balance only to LINE 3, Schedule D for this line. If no Schedule D, carry forward to appropriate line of Summary

3504001489

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Elliott D. Hartstein, Treasurer
10th District Mondale Delegate
Committee
908 Providence Lane
Buffalo Grove, IL 60090

Re: MUR 1667

Dear Mr. Hartstein:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

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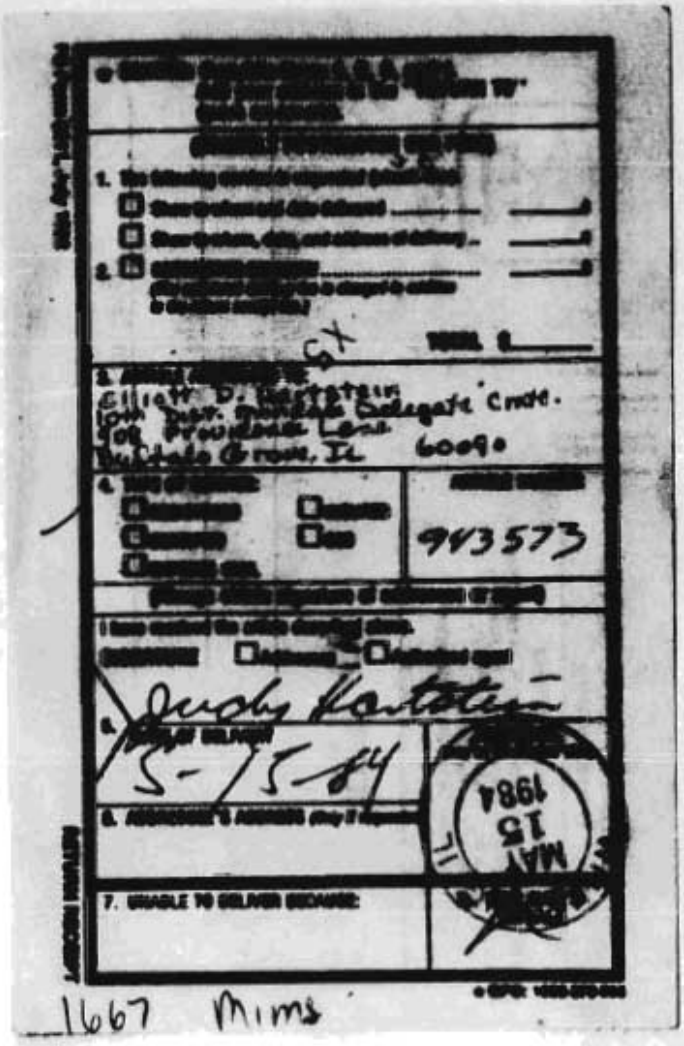
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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



1667 Mims

35040501491

HAND DELIVERED
84 JUN 15 A9:36
Cash 36.31

LAW OFFICES
FRIEDMAN & KOVEN
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
208 SOUTH LA SALLE STREET
CHICAGO, ILLINOIS 60604
(312) 348-6500
CABLE ADDRESS "FREEZOR"
TELEX 254083

MICHAEL D. SHER
DIRECT TELEPHONE NUMBER:
(312) 269-0606

9th Dist

FEC
84 JUN 15 P1:20

June 14, 1984

FEDERAL EXPRESS

Charles N. Steele, Esq.
General Counsel
Federal Election Commission
1325 K Street, N. W.
Washington, DC 20463

Re: MUR 1704 / Consolidated Response of Mondale Delegate Committees from the Third, Fourth, Seventh, Ninth, Eleventh, Fourteenth, Seventeenth, Twentieth and Twenty-First Districts (Illinois)

Dear Mr. Steele:

Enclosed are the Statements of Designation of Counsel which designate me as counsel for each of the above-referenced Mondale Delegate Committees from the State of Illinois (the "Delegate Committees") in MUR 1704. This letter is submitted to the Federal Election Commission (the "Commission") on behalf of the Delegate Committees in response to the Complaint filed with the Commission by the National Right to Work Committee and Ralph Martin (Bud) Hettinga, Jr. on May 18, 1984 (the "Complaint").

The Complaint does not name or designate any of the Delegate Committees as respondents and, accordingly, the Commission should not consider the Delegate Committees as respondents in this proceeding. Section 111.4 of the Commission's regulations requires that each complaint which is filed with the Commission must "clearly identify as a respondent each person or entity who is alleged to have committed a violation" and must "contain a clear and concise recitation of the facts which describe a violation of a statute or regulation over which the Commission has jurisdiction." 11 C.F.R. § 111.4(d)(1) and (3); see also 2 U.S.C. § 437g(a)(1). Neither the caption nor the content of the Complaint designates any of the Delegate Committees as respondents. Moreover, the Complaint fails to recite any facts which describe a violation by any one or more of the Delegate Committees of any "statute or regulation over which the Commission has jurisdiction." Accordingly, at least insofar as the Complaint may be directed to these Delegate Committees, it fails to meet the clear requirements of Section 111.4(d), is fatally defective, should not be considered by the Commission to be directed to these Delegate Committees or, in the alternative, should be dismissed insofar as the Commission determines that it may be directed to these Delegate Committees.

3504014 92

Since the Complaint, on its face, is not directed against the Delegate Committees, no further response is made to the Complaint on behalf of the Delegate Committees at this time. However, the Delegate Committees reserve their right to respond to the substantive claims of the Complaint at such time as such response may be required.

Respectfully submitted,

THIRD CONGRESSIONAL DISTRICT (ILLINOIS) DELEGATES FOR MONDALE

FOURTH DISTRICT (ILLINOIS) MONDALE DELEGATE COMMITTEE

COMMITTEE CONGRESSIONAL DISTRICT (ILLINOIS) DELEGATES FOR MONDALE

NINTH DISTRICT (ILLINOIS) MONDALE DELEGATE COMMITTEE

ELEVENTH DISTRICT (ILLINOIS) MONDALE DELEGATE COMMITTEE

FOURTEENTH DISTRICT (ILLINOIS) DELEGATE COMMITTEE FOR MONDALE

SEVENTEENTH DISTRICT (ILLINOIS) MONDALE DELEGATE COMMITTEE

TWENTIETH CONGRESSIONAL DISTRICT (ILLINOIS) DELEGATES FOR MONDALE

TWENTY-FIRST CONGRESSIONAL DISTRICT (ILLINOIS) MONDALE DELEGATES COMMITTEE

BY Michael D. Sher

Michael D. Sher, Counsel for the Delegate Committees

Friedman & Koven
208 South LaSalle Street
Chicago, IL 60604
(312) 346-8500

MDS:ji

3504050014493

Log # 3558

11 JUN 11 A8:55

LAW OFFICES

FRIEDMAN & KOVEN

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

208 SOUTH LA SALLE STREET

CHICAGO, ILLINOIS 60604

(312) 348-6500

CABLE ADDRESS "FREEZOR"

TELEX 254083

MICHAEL D. SHER

DIRECT TELEPHONE NUMBER:

(312) 368-9608

June 8, 1984

Mr. John D. Gibson
Assistant Staff Director
Reports Analysis Division
Federal Election Commission
1325 K Street, N. W.
Washington, DC 20463

Re: MUR 1667

Dear Mr. Gibson:

I have been designated as counsel for Mondale Delegate Committees from the Third, Fourth, Seventh, Ninth, Eleventh, Twelfth, Fourteenth, Seventeenth, Nineteenth, Twentieth, Twenty-First and Twenty-Second Districts from the State of Illinois (the "Delegate Committees") in the above-referenced proceeding before the Federal Election Commission (the "Commission"). The treasurers of certain of the Delegate Committees have received letters from you, all dated May 16, 1984, which advise the Delegate Committees that in view of the above-referenced proceeding before the Commission, "the Federal Election Commission cannot approve any requests for termination from your committee, at this time." Your letter further reminds the committees "that until termination is authorized, your reporting requirements under 2 U.S.C. § 434 continue."

On behalf of the Delegate Committees, I respectfully suggest that neither Section 434, Section 433(d) nor 11 C.F.R. § 102.3 supports your contention that continued reporting is required by the Delegate Committees until such time as the Commission approves requests for termination. I am unaware of any authority which supports the Commission's apparent position that its authorization is necessary for the termination of a political committee, where that committee "no longer receive[s] any contributions or make[s] any disbursements that would otherwise qualify it as a political committee" and where that committee "has no outstanding debts and obligations." 11 C.F.R. § 102.3(a). Therefore, there appears to be no legal basis for your assertion that the Delegate Committees, which no longer conduct any activities, are required to report to the Commission pursuant to Section 434 until such time as their termination is "approved" by the Commission.

Accordingly, until such time as the Commission explains by what authority it can continue to compel inactive political committees to file reports pursuant to Section 434, the Delegate Committees presently intend to file the appropriate termination reports on the appropriate FEC Forms in accordance with 11 C.F.R. § 102.3, or have already done

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so in certain instances. Based upon the express provisions of Sections 433(d) and 434 of Title 2, and 11 C.F.R. § 102.3 promulgated pursuant thereto, the Delegate Committees respectfully submit that they are not required, nor do they presently intend, to file any additional quarterly reports with the Commission, as such is not required by any of the aforesaid provisions. Please advise me of the Commission's position regarding this matter and whether it has or will reconsider the position expressed in your letter of May 16. Thank you.

Very truly yours,

Michael D. Sher

Michael D. Sher

MDS:ji

cc: Charles N. Steele, Esq.

3504050149

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1709

NAME OF COUNSEL: Michael D Shur

ADDRESS: Friedman & Koven
208 S. LaSalle St.
Chicago, Ill. 60604

TELEPHONE: (312) 269-9605

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.

6/4/84
Date

Amy A. Kurzenski
Signature

RESPONDENT'S NAME: 9th District Member Delegate (Comm. Hee (Ill.)

ADDRESS: 1226 Greenleaf
Evanston, Ill. 60202

HOME PHONE: (312) 864-3149

BUSINESS PHONE: (312) 269-0306

3504014496

RECEIVED BY THE FEC

84 MAY 22 A 9:50

LAW OFFICES

FRIEDMAN & KOVEN

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

208 SOUTH LA SALLE STREET

CHICAGO, ILLINOIS 60604

(312) 346-8500

CABLE ADDRESS "FREEZOR"

TELEX 254083

MICHAEL D. SHER

DIRECT TELEPHONE NUMBER

(312) 368-8608

9th Elliot

May 21, 1985

Charles N. Steele, Esq.
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, DC 20463

Re: MUR 1667

Dear Mr. Steele:

Enclosed are the Statements of Designation of Counsel of the Third Congressional District (Illinois) Delegates for Mondale and the Ninth District (Illinois) Mondale Delegate Committee which designate me as counsel for those Delegate Committees in the above-referenced proceeding. I will file responses on behalf of those Delegate Committees with the Commission in accordance with the Federal Election Campaign Act.

Very truly yours,

Michael D. Sher

Michael D. Sher

MDS:ji

Enclosures

cc: Mr. Greg A. Kinczpuski
Ms. Lenore T. Colson

3504050014497

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1667

NAME OF COUNSEL: Michael D. Sher

ADDRESS: Friedman & Koven

208 S. LaSalle, Suite 900

Chicago, IL. 60604

TELEPHONE: (312) 269-9605

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.

5/16/84
Date

Greg A. Kinczewski
Signature

RESPONDENT'S NAME: Greg A. Kinczewski / Ninth District Mondale Delegate Committee

ADDRESS: 1226 Greenleaf

Evanston, IL. 60202

HOME PHONE: (312) 864-3149

BUSINESS PHONE: (312) 269-0300

3504050149 8

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Gregory A. Kinczewski, Treasurer
Ninth District Mondale Delegate
Committee
1226 N. Greenleaf
Evanston, IL 60202

Re: MUR 1667

Dear Mr. Kinczewski:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

3504014499

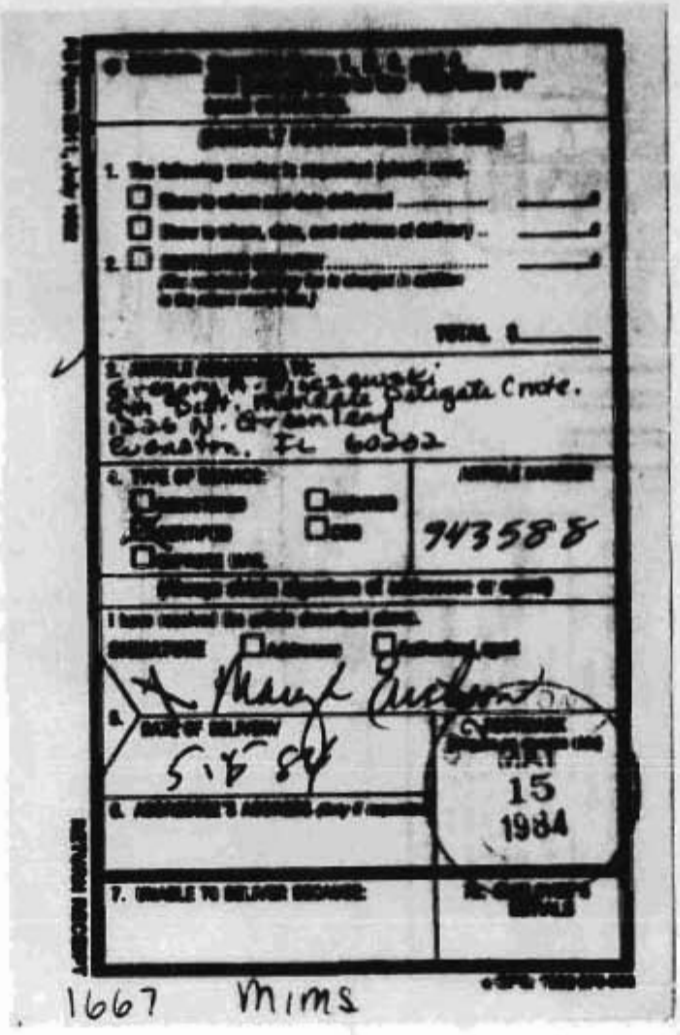
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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



1667 Mims

3504050150O

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Roman Lobodzinski, Treasurer
Eighth District Mondale Delegate
Committee
3055 N. Milwaukee
Chicago, IL 60618

Re: MUR 1667

Dear Mr. Lobodzinski:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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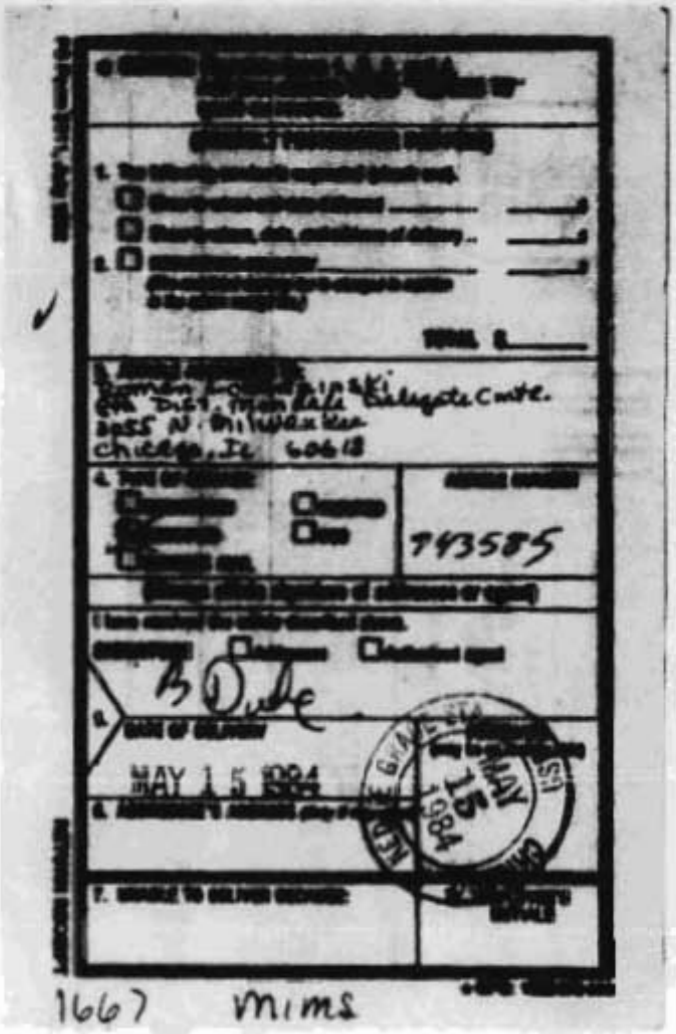
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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



3504050150 2

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(Cat # 363)

LAW OFFICES
FRIEDMAN & KOVEN
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
208 SOUTH LA SALLE STREET
CHICAGO, ILLINOIS 60604
(312) 348-8500
CABLE ADDRESS "FREEZOR"
TELEX 254083

MICHAEL D. SHER
DIRECT TELEPHONE NUMBER
(312) 269-0000

7th Dist

June 14, 1984

FEDERAL EXPRESS

Charles N. Steele, Esq.
General Counsel
Federal Election Commission
1325 K Street, N. W.
Washington, DC 20463

Re: MUR 1704 / Consolidated Response of Mondale Delegate Committees from the Third, Fourth, Seventh, Ninth, Eleventh, Fourteenth, Seventeenth, Twentieth and Twenty-First Districts (Illinois)

Dear Mr. Steele:

Enclosed are the Statements of Designation of Counsel which designate me as counsel for each of the above-referenced Mondale Delegate Committees from the State of Illinois (the "Delegate Committees") in MUR 1704. This letter is submitted to the Federal Election Commission (the "Commission") on behalf of the Delegate Committees in response to the Complaint filed with the Commission by the National Right to Work Committee and Ralph Martin (Bud) Hettinga, Jr. on May 18, 1984 (the "Complaint").

The Complaint does not name or designate any of the Delegate Committees as respondents and, accordingly, the Commission should not consider the Delegate Committees as respondents in this proceeding. Section 111.4 of the Commission's regulations requires that each complaint which is filed with the Commission must "clearly identify as a respondent each person or entity who is alleged to have committed a violation" and must "contain a clear and concise recitation of the facts which describe a violation of a statute or regulation over which the Commission has jurisdiction." 11 C.F.R. § 111.4(d)(1) and (3); see also 2 U.S.C. § 437g(a)(1). Neither the caption nor the content of the Complaint designates any of the Delegate Committees as respondents. Moreover, the Complaint fails to recite any facts which describe a violation by any one or more of the Delegate Committees of any "statute or regulation over which the Commission has jurisdiction." Accordingly, at least insofar as the Complaint may be directed to these Delegate Committees, it fails to meet the clear requirements of Section 111.4(d), is fatally defective, should not be considered by the Commission to be directed to these Delegate Committees or, in the alternative, should be dismissed insofar as the Commission determines that it may be directed to these Delegate Committees.

3504015003

Since the Complaint, on its face, is not directed against the Delegate Committees, no further response is made to the Complaint on behalf of the Delegate Committees at this time. However, the Delegate Committees reserve their right to respond to the substantive claims of the Complaint at such time as such response may be required.

Respectfully submitted,

THIRD CONGRESSIONAL DISTRICT (ILLINOIS) DELEGATES FOR MONDALE

FOURTH DISTRICT (ILLINOIS) MONDALE DELEGATE COMMITTEE

COMMITTEE CONGRESSIONAL DISTRICT (ILLINOIS) DELEGATES FOR MONDALE

NINTH DISTRICT (ILLINOIS) MONDALE DELEGATE COMMITTEE

ELEVENTH DISTRICT (ILLINOIS) MONDALE DELEGATE COMMITTEE

FOURTEENTH DISTRICT (ILLINOIS) DELEGATE COMMITTEE FOR MONDALE

SEVENTEENTH DISTRICT (ILLINOIS) MONDALE DELEGATE COMMITTEE

TWENTIETH CONGRESSIONAL DISTRICT (ILLINOIS) DELEGATES FOR MONDALE

TWENTY-FIRST CONGRESSIONAL DISTRICT (ILLINOIS) MONDALE DELEGATES COMMITTEE

BY Michael D. Sher

Michael D. Sher, Counsel for the Delegate Committees

Friedman & Koven
208 South LaSalle Street
Chicago, IL 60604
(312) 346-8500

MDS:jl

3504050150 4

Case # 3551

14 JUN 11 08:55

LAW OFFICES

FRIEDMAN & KOVEN

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

208 SOUTH LA SALLE STREET

CHICAGO, ILLINOIS 60604

(312) 346-8500

CABLE ADDRESS "FREEZOR"

TELEX 254083

MICHAEL D. SHER

DIRECT TELEPHONE NUMBER

(312) 269-8005

June 8, 1984

Mr. John D. Gibson
Assistant Staff Director
Reports Analysis Division
Federal Election Commission
1325 K Street, N. W.
Washington, DC 20463

Re: MUR 1667

Dear Mr. Gibson:

I have been designated as counsel for Mondale Delegate Committees from the Third, Fourth, Seventh, Ninth, Eleventh, Twelfth, Fourteenth, Seventeenth, Nineteenth, Twentieth, Twenty-First and Twenty-Second Districts from the State of Illinois (the "Delegate Committees") in the above-referenced proceeding before the Federal Election Commission (the "Commission"). The treasurers of certain of the Delegate Committees have received letters from you, all dated May 16, 1984, which advise the Delegate Committees that in view of the above-referenced proceeding before the Commission, "the Federal Election Commission cannot approve any requests for termination from your committee, at this time." Your letter further reminds the committees "that until termination is authorized, your reporting requirements under 2 U.S.C. § 434 continue."

On behalf of the Delegate Committees, I respectfully suggest that neither Section 434, Section 433(d) nor 11 C.F.R. § 102.3 supports your contention that continued reporting is required by the Delegate Committees until such time as the Commission approves requests for termination. I am unaware of any authority which supports the Commission's apparent position that its authorization is necessary for the termination of a political committee, where that committee "no longer receive[s] any contributions or make[s] any disbursements that would otherwise qualify it as a political committee" and where that committee "has no outstanding debts and obligations." 11 C.F.R. § 102.3(a). Therefore, there appears to be no legal basis for your assertion that the Delegate Committees, which no longer conduct any activities, are required to report to the Commission pursuant to Section 434 until such time as their termination is "approved" by the Commission.

Accordingly, until such time as the Commission explains by what authority it can continue to compel inactive political committees to file reports pursuant to Section 434, the Delegate Committees presently intend to file the appropriate termination reports on the appropriate FEC Forms in accordance with 11 C.F.R. § 102.3, or have already done

3504015005

so in certain instances. Based upon the express provisions of Sections 433(d) and 434 of Title 2, and 11 C.F.R. § 102.3 promulgated pursuant thereto, the Delegate Committees respectfully submit that they are not required, nor do they presently intend, to file any additional quarterly reports with the Commission, as such is not required by any of the aforesaid provisions. Please advise me of the Commission's position regarding this matter and whether it has or will reconsider the position expressed in your letter of May 16. Thank you.

Very truly yours,

Michael D. Sher

Michael D. Sher

MDS:ji

cc: Charles N. Steele, Esq.

3504050150 6

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1704

NAME OF COUNSEL: Michael D. Sher

ADDRESS: FRIEDMAN & KOVEN
208 S. LaSalle
Chicago, IL 60604

TELEPHONE: (312) 346-8500

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.

June 1, 1984
Date

Signature

Seventh Congressional District Delegates for Mondale

RESPONDENT'S NAME: William H. Taylor

ADDRESS: SACHNOFF, WEAVER & RUBENSTEIN, LTD.
One IBM Plaza, #4700
Chicago, IL 60611

HOME PHONE: (312) 943-1217

BUSINESS PHONE: (312) 644-2400

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84 MAY 22 A 8:58

LAW OFFICES

FRIEDMAN & KOVEN

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

208 SOUTH LA SALLE STREET

CHICAGO, ILLINOIS 60604

(312) 346-6500

CABLE ADDRESS "FREEZOR"

TELEX 254083

MICHAEL D. SHER

DIRECT TELEPHONE NUMBER

(312) 269-6006

May 21, 1985

Charles N. Steele, Esq.
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, DC 20463

Re: MUR 1667

Dear Mr. Steele:

Enclosed are the Statements of Designation of Counsel of the Seventh Congressional District (Illinois) Delegates for Mondale, the Seventeenth District (Illinois) Mondale Delegate Committee and the Twentieth Congressional District (Illinois) Delegates for Mondale which designate me as counsel for those Delegate Committees in the above-referenced proceeding. I will file responses on behalf of those Delegate Committees with the Commission in accordance with the Federal Election Campaign Act.

Very truly yours,

Michael D. Sher

Michael D. Sher

MDS:ji

Enclosures

cc: William H. Taylor, Esq.
Mr. Bill Dempsey
Ms. Donna M. McWilliams

3504021503

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1667

NAME OF COUNSEL: Michael Sher

ADDRESS: FRIEDMAN & KOVEN
208 S. LaSalle St., #900
Chicago, IL 60604

TELEPHONE: (312) 269-9605

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 16, 1984
Date

Signature

RESPONDENT'S NAME: William H. Taylor / Seventh Congressional District Delegates for Mondale

ADDRESS: SACHNOFF, WEAVER & RUBENSTEIN
One IBM Plaza, Suite 4700
Chicago, IL 60611

HOME PHONE: (312) 943-1217

BUSINESS PHONE: (312) 644-2400

3504052150 9

EDMAN & KOVEN
SOUTH LA SALLE STREET
CAGO, ILLINOIS 60604

84 MAY 22 A9:50

Charles N. Steele, Esq.
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, DC 20463

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

William H. Taylor, II, Treasurer
7th Congressional District Delegates
For Mondale
One IBM Plaza
Suite 4700
Chicago, IL 60611

Re: MUR 1667

Dear Mr. Taylor:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

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

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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.

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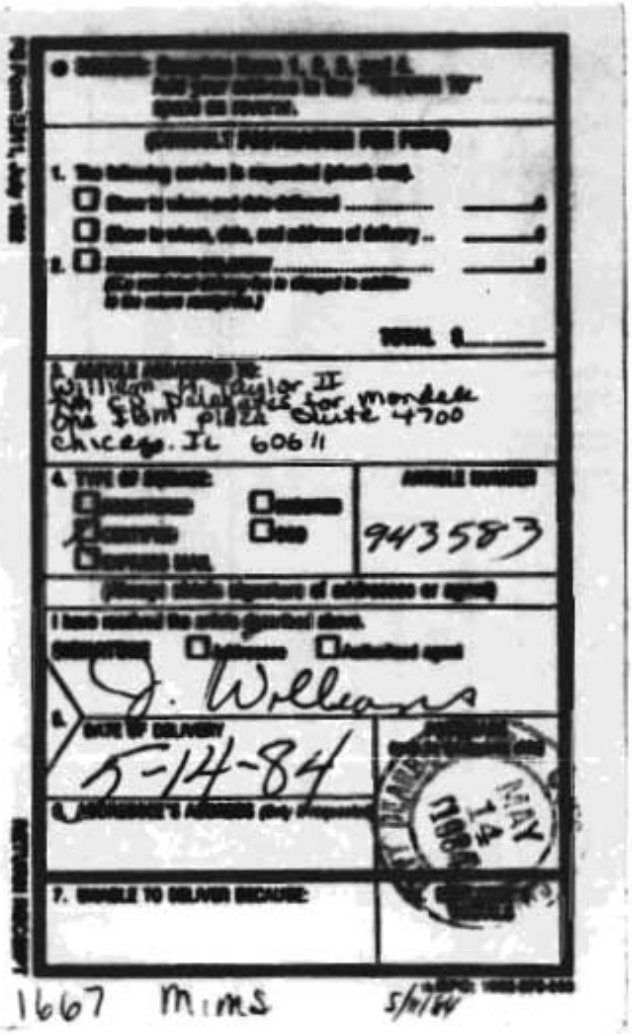
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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



1667 Mims 5/17/84

9504050512

6-IX CONGRESSIONAL DISTRICT
MONROE DELEGATE COMMITTEE
478 WASHINGTON ST.
ELMHURST, N.Y.

RECEIVED AT THE FEC
1984 JUN 18 P 3:25
1984 JUN 18 P 1:37

JUNE 6, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

CHARLES N. STEELE, GENERAL COUNSEL
FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

RE: MUR 1704 - 5/29/84

DEAR MR. STEELE:

SINCE MUR 1704 IS THE SAME TYPE OF COMPLAINT AS MUR 1667, OUR RESPONSE IS THE SAME AND I AM MERELY ENCLOSING A COPY OF OUR RESPONSE TO MUR 1667, INCLUDING ATTACHMENTS.

SINCERELY,

Jack L Bright

JACK L. BRIGHT,
TREASURER

9504050151 3

Sixth Congressional District
Mondale Delegates' Committee
478 Washington Street
Elmhurst, IL 60126

May 21, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Charles N. Steele, General Counsel
Federal Election Commission
Washington, DC 20463

RE: MUR 1667

Dear Mr. Steele:

I am in receipt of yours of May 11, 1984.

The 6th District Mondale Delegate Committee and I, as treasurer, do hereby affirm that we are not in violation of any sections of the Federal Election Campaign Act of 1971 as amended.

Our committee has acted autonomously and independently of the Mondale campaign as attested to by the attached material:

(1) Our 6th District brochure.

(2) Our request for contributions letter.

(3) A copy of the ad placed in the ad book for the York Township Democratic Party annual St. Patrick's week dinner.

(4) A copy of the DuPage Democrat monthly newspaper with our ad (placed jointly with the 13th District Mondale Delegate Committee) on page 4.

Furthermore, I am enclosing a copy of a letter from one of our delegates, Ms. Jane Spirgel, reimbursing the PAC via the committee for her approximate portion of the PAC money. Also, a copy of my letter to the PAC returning the funds leftover from our campaign.

Sincerely,

JACK L. BRIGHT,
Treasurer

3504015-1

[redacted] TOWNSHIP
[redacted] DEMOCRATIC PARTY

[redacted]

[redacted]

[redacted]

WALTER MONDALE





6th District Delegates
HERBERT "BUD" LOFTUS
DIANA B. SHEFFER
JANE N. SPIEGEL
TONI KANE (Alternate)



13th District Delegates
JOHN E. DVORAK
JOAN P. MURPHY
J. GLENN SCHNEIDER
JEAN C. TELLO (Alternate)

VOTE FOR THE MONDALE DELEGATES

"We want to thank our many York Township supporters for their efforts on behalf of the campaign for WALTER MONDALE."

3504050515

DU PAGE DEMOCRAT

ISSUE NO. 240 MARCH 1984

25 CENTS/ COPY: $3.00/YEAR

A MONTHLY NEWSPAPER COVERING DEMOCRATIC NEWS AND OPINION IN THE FAR WESTERN SUBURBS. PUBLISHED AND SUBSIDIZED BY THE LOMBARD DEMOCRATIC CLUB. TRUMAN KIRKPATRICK, PRESIDENT.

3 5040 5015 17

HOW SHOULD DEMOCRATS MAKE CASE VS. REAGANOMICS IN 1984 CAMPAIGN?

ECONOMICS PROF. ADUDDELL TO SPEAK AT DEMOCRATIC CLUB MEETING MAR. 16

Loyola University economics professor Robert Aduddell will make his third visit to the Lombard Democratic Club on Friday evening, March 16, to talk and answer questions about the best ways Democratic campaigners can argue against the economic programs of the Reagan administration.

The meeting, the regular monthly meeting of the Lombard Democratic Club, will begin at 8 P.M. March 16 in Room 7, the downstairs meeting room, of the Lombard Community House, Grace Street and St. Charles Road, Lombard.

Dr. Aduddell will begin with a speech about Reaganomics and its evils. He will be followed on the speakers' platform by Dr. Robert Renshaw, the Democratic candidate for U. S. Congress from the 6th Congressional District who is also an economics professor, teaching at Northern Illinois University, DeKalb. Dr. Renshaw will give a commentary on the main speech.

Another commentary on the opening speech by Dr. Aduddell will then be given by Jane Spirgel, the lone Democratic member of the DuPage County Board, who also is teaching economics courses--at the Midwest College of Engineering.

The floor will then be open for questions and comments from the audience. The question period will be moderated by Lombard Democratic Club president Truman Kirkpatrick.

It is hoped that the result of all this talking about economic problems will be to equip several local Democrats with enough arguments and factual knowledge to permit them to challenge effectively the right-wing economic views of the local Republican party and thus increase the chances for Democratic candidates in the November election.

After the discussion, the Club will have a social hour with refreshments. The meeting is open to the public.

ADUDDELL

Robert Aduddell is an Associate Professor of Economics at Loyola University, where he has taught for the last 19 years. He holds a Ph.D. degree in economics from Northwestern University.

He worked as a consultant with Governor Thompson's Cost Control Task Force in 1977.

In recent years, Dr. Aduddell

(Continued on Page 2)

Tax Fiasco Shows Need for 2-Party System—Redmond

The $150,000 extra cost to send DuPage County tax bills out on time demonstrates the failure of one-party county government, William A. Redmond, county Democratic chairman, said February 24.

"Early last week, county officials announced it would be impossible to mail the bills by May 1, as required by law," said Redmond. "The reaction from school districts was immediate. The schools reported that the tardiness would cost them millions, because they would have to borrow money and pay interest to meet their payrolls.

"So, a week later, county officials said that the bills would go out on May 1 after all, but it would cost the taxpayers $150,000 more anyway, to rewrite computer programs and pay more to employees, mostly in overtime premiums.

"The new plan is to do what Cook County already has been doing--mail a bill on May 1 which would be half of last year's bill, and follow with a final installment in August.

(Continued on Page 2)

DEMOCRATIC NEWS

(Continued from Page 3)

The Paulist Choir Alumni Chor- directed by George Barrett, of on, will sing.

peaker Madigan is a strong fav- , and effective friend, of York - ship Democrats," said Smyth. e the Cutback Amendment abol- l minority representation in e districts, there has been no cratic legislator from DuPage ty in the General Assembly. We to depend on our statewide lead- er to look after our interests.

"The Speaker has led in legislation for health care, social services, education, and all the basic objectives of our party. This will be his first appearance before our organization. We expect a goodly crowd to meet him and hear him."

The Speaker will be introduced by William A. Redmond, DuPage Democratic chairman, who was Madigan's immediate predecessor as Speaker. Redmond served three terms as Speaker near the close of his 22-year career in the House.

Smyth said tickets to the event may be obtained from any York Township Democratic precinct committeeman, or from Karen Rothermel, dinner chairman, 107 Elm Tree Lane, Elmhurst, 834-6186.

WALTER MONDALE FOR PRESIDENT

Support the Delegates Who Support Mondale

The 6th District Mondale Slate

HERBERT J. "BUD" LOFTUS (MONDALE)
DIANA B. SHEFFER (MONDALE)
JANE N. SPIEGEL (MONDALE)

RONI R. KANE (MONDALE)

The 13th District Mondale Slate

JOHN E. DVORAK (MONDALE)
DAN P. MURPHY (MONDALE)
GLENN SCHNEIDER (MONDALE)

JAN C. TELLO (MONDALE)

(Paid political advertisement)

YOUNG DEMOCRATS CANDIDATES' NIGHT MARCH 14

DuPage County Young Democrats are holding a "Candidates' Night" on Wednesday, March 14, at the Elmhurst Country Club, 01560 Wood Dale Road, Wood Dale, from 7:30 to 10:30 P.M. The general public is invited.

Rick Brese, who is responsible for the publicity for the Young Democrats, tells us that all Democratic precinct committeemen in the county, and all candidates for county, state, and national office in the upcoming election have been invited to be present and to speak. State representative candidates, state senatorial candidates, U.S. Senate candidates, and presidential candidates have been invited and a number of them are expected to be present. Of the U.S. Senate candidates, Roland Burris has accepted the invitation and others may follow suit.

Admission to the event is free; there will be a cash bar. Candidates will have an opportunity to display their literature and to meet and greet the public.

WOMEN'S TRUTH SQUAD ON REAGAN

The DuPage East chapter of the National Organization for Women has a "Women's Truth Squad on Reagan" which has taken on the job of keeping track of the more outrageous falsehoods uttered by Ronald Reagan and supplying people with the answers. Judy Gracious Curin is heading up the effort. Anyone interested in working on this issue or in having more information should contact her at 960-3102.

Darline Peterson, the 1984 president of the DuPage East N.O.W. chapter, is serving as the acting Democratic precinct committeeman of Precinct 6, York Township.

HART AND MONDALE CAMPAIGNS FOCUS ON DuPAGE DEMOCRATS

The surging Hart-for-President campaign in DuPage County has just acquired a headquarters, a set of telephones, a DuPage County coordinator, and a new set of candidates for the Democratic National Convention pledged to Hart.

The headquarters has just been opened at 1007S7 22nd St., Lombard, phones 620-0284 and 620-7443. The coordinator is Sherry Hayes of Roselle. The new candidates for delegate pledged to Hart in the 6th District are the three candidates formerly pledged to Alan Cranston, who switched their allegiance to Gary Hart immediately after Cranston pulled out of the presidential race on February 29; they are Truman Kirkpatrick, Wendy Georges and LeRoy Kemmel. The Cranston alternate delegate candidate, Dorothy Yetter, also switched and is now a Hart alternate.

Not to be outdone, the Mondale campaign has opened a 6th District headquarters at 1001 W. Lake Street, Addison. The phone is 543-3010 and the campaign coordinator is Ron Holzacker.

The reason for the intensified activity is obvious. Until a few days ago, most people had assumed that the Democratic presidential choice would be pretty well determined before the Illinois primary. Now Illinois appears to be important and the outcome here uncertain. So both campaigns are running hard in Illinois. It is quite possible that one or more of the presidential candidates themselves will visit DuPage County on short notice within the next few days.

DuPAGE DEMOCRAT subscribers are invited to make their choice of candidate and then to get into the battle, if they are not involved already.

JOKE CORNER

A motto for a former president:

If at first you don't succeed, destroy all evidence that you tried.

And one that the present occupant of the White House knows all too well:

The secret of success is sincerity. Once you can fake that, you've got it made.

6th Congressional District Delegates for **MONDALE**

committee

Dear Friend,

We four are the Walter Mondale pledged delegates to the Democratic National Convention. We are writing to tell you of our resolve to help Fritz Mondale restore a national commitment to peace, fairness, and compassion, and to ask you to join with us.

Democrats and other concerned citizens are mobilizing as never before to stop Ronald Reagan's assault on the conscience and safety of Americans. We firmly believe that the right person to lead that effort is Walter Mondale. In order for that to happen, Mondale pledged delegates must be elected in the Illinois Democratic Primary, on March 20th.

Fritz Mondale brings to this campaign a combination of experience, ability, and vision that is unmatched by other candidates. Mondale alone has demonstrated the broadly based appeal to working people, educators, women, and the disadvantaged, which has always been both the hope and the promise of the Democratic Party.

We are honored to represent Fritz Mondale in this Congressional District and eager to begin our effort. We ask you to help us by contributing to the cost of the local campaign. While the National/State Mondale organization will finance radio and television advertising, the delegate committee in each district must be responsible for brochures, mailings, and phone banks. Of course, we would welcome your active participation in the campaign as well.

Thank you for your consideration. Please make checks payable to:

6th District Mondale Delegate Committee
c/o Charles Hickman, Treas. 522 Monarch Lane
Addison, Illinois

Kindest personal regards,

Bud Loftus
Bud Loftus
Former State Representative

Jane Spirgel
Jane Spirgel
Member DuPage County Board

Diana Sheffer
Diana Sheffer
Chicago Teachers Union, Local #1 AFT, AFL-CIO

Toni Kane
Toni Kane
Illinois Education Association

3504050513

Authorized and paid for by the 6th Congressional District Delegates for Mondale Committee.
A copy of our report on file with the Federal Election Commission, Washington, D.C.

opeiu/28/cm

DEMOCRATIC NEWS

(Continued from Page 3)

ies. The Paulist Choir Alumni Chorale, directed by George Barrett, of Darien, will sing.

"Speaker Madigan is a strong favorite, and effective friend, of York Township Democrats," said Smyth. "Since the Cutback Amendment abolished minority representation in House districts, there has been no Democratic legislator from DuPage County in the General Assembly. We have to depend on our statewide leader to look after our interests.

"The Speaker has led in legislation for health care, social services, education, and all the basic objectives of our party. This will be his first appearance before our organization. We expect a goodly crowd to meet him and hear him."

The Speaker will be introduced by William A. Redmond, DuPage Democratic chairman, who was Madigan's immediate predecessor as Speaker. Redmond served three terms as Speaker near the close of his 23-year career in the House.

Smyth said tickets to the event may be obtained from any York Township Democratic precinct committeeman, or from Karen Rothermel, dinner chairman, 107 Elm Tree Lane, Elmhurst, 834-6186.

WALTER MONDALE
FOR PRESIDENT



Support the Delegates Who Support Mondale

The 6th District Mondale Slate

- HERBERT J. "BUD" LOFTUS (MONDALE)
- DIANA B. SHEFFER (MONDALE)
- JANE N. SPIEGEL (MONDALE)

- TONI R. KANE (MONDALE)

The 13th District Mondale Slate

- JOHN E. DVORAK (MONDALE)
- JOAN P. MURPHY (MONDALE)
- J. GLENN SCHNEIDER (MONDALE)

- JEAN C. TELLO (MONDALE)

(Paid political advertisement)

YOUNG DEMOCRATS CANDIDATES' NIGHT MARCH 14

DuPage County Young Democrats are holding a "Candidates' Night" on Wednesday, March 14, at the Elmhurst Country Club, 401540 Wood Dale Road, Wood Dale, from 7:30 to 10:30 P.M. The general public is invited.

Rick Brase, who is responsible for the publicity for the Young Democrats, tells us that all Democratic precinct committeemen in the county, and all candidates for county, state, and national office in the upcoming election have been invited to be present and to speak. State representative candidates, state senatorial candidates, U.S. Senate candidates, and presidential candidates have been invited and a number of them are expected to be present. Of the U.S. Senate candidates, Roland Burris has accepted the invitation and others may follow suit.

Admission to the event is free; there will be a cash bar. Candidates will have an opportunity to display their literature and to meet and greet the public.

WOMEN'S TRUTH SQUAD ON REAGAN

The DuPage East chapter of the National Organization for Women has a "Women's Truth Squad on Reagan" which has taken on the job of keeping track of the more outrageous falsehoods uttered by Ronald Reagan and supplying people with the answers. Judy Gracious Curin is heading up the effort. Anyone interested in working on this issue or in having more information should contact her at 960-3102.

Darline Peterson, the 1984 president of the DuPage East N.O.W. chapter, is serving as the acting Democratic precinct committeeman of Precinct 6, York Township.

HART AND MONDALE CAMPAIGNS FOCUS ON DuPAGE DEMOCRATS

The surging Hart-for-President campaign in DuPage County has just acquired a headquarters, a set of telephones, a DuPage County coordinator, and a new set of candidates for the Democratic National Convention pledged to Hart.

The headquarters has just been opened at 18W787 22nd St., Lombard, phones 620-6284 and 620-7443. The coordinator is Sherry Hayes of Roselle. The new candidates for delegate pledged to Hart in the 6th District are the three candidates formerly pledged to Alan Cranston, who switched their allegiance to Gary Hart immediately after Cranston pulled out of the presidential race on February 29; they are Truman Kirkpatrick, Wendy Georges and LeRoy Kennel. The Cranston alternate delegate candidate, Dorothy Yetter, also switched and is now a Hart alternate.

Not to be outdone, the Mondale campaign has opened a 6th District headquarters at 1801 W. Lake Street, Addison. The phone is 543-3010 and the campaign coordinator is Ron Holzacker.

The reason for the intensified activity is obvious. Until a few days ago, most people had assumed that the Democratic presidential choice would be pretty well determined before the Illinois primary. Now Illinois appears to be important and the outcome here uncertain. So both campaigns are running hard in Illinois. It is quite possible that one or more of the presidential candidates themselves will visit DuPage County on short notice within the next few days.

DuPAGE DEMOCRAT subscribers are invited to make their choice of candidate and then to get into the battle, if they are not involved already.

JOKE CORNER

A motto for a former president:

If at first you don't succeed, destroy all evidence that you tried.

And one that the present occupant of the White House knows all too well:

The secret of success is sincerity. Once you can fake that, you've got it made.

3504050119

Jane Spirgel
334 River Glen
Elmhurst, Illinois 60126

May 16, 1984

Mr. Jack Bright, Treasurer
6th District Mondale Delegates Comm.
478 Washington,
Elmhurst, IL 60126

Dear Mr. Bright,

As I have indicated to you, I do not wish to make use of PAC contributions in funding my share of our delegate election expenses.

It is my understanding that approximately $800 in PAC contributed funds were expended on behalf of the 6th District Mondale delegate candidates. Since we are four candidates, it seems clear that $200 of that amount is attributable to the campaign effort on my behalf. I therefore enclose my personal check in the amount of $200; I request that you reimburse this amount to the contributing PAC.

Thank you for your attention to this matter.

Sincerely,

Jane Spirgel

Jane Spirgel

35040501520



Support the Delegates Who Support Mondale

The 6th District Mondale Slate

HERBERT "BUD" LOFTUS, Former State Representative; a Democratic delegate since 1972 and a prominent DuPage attorney.

DIANA SHEFFER, School teacher and member of the Illinois Federation of Teachers (IFT); and Candidate for State Representative.

JANE SPIRGEL, DuPage County Board member; First elected in 1974, only Democratic member on Board.

Alternate

TONI KANE, School Teacher and Women's Rights Activist and a member of the Illinois Education Association.

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On March 20th Vote for WALTER MONDALE FOR PRESIDENT

AND THE MONDALE DELEGATES

(VOTE FOR 3)

- ☒ **HERBERT J. "BUD" LOFTUS** (MONDALE)
- ☒ **DIANA B. SHEFFER** (MONDALE)
- ☒ **JANE N. SPIRGEL** (MONDALE)

MONDALE ALTERNATE

(VOTE FOR 1)

- ☒ **TONI R. KANE** (MONDALE)

MONDALE

ILLINOIS FOR MONDALE

Chicago
30 W. Washington, #530
Chicago, IL 60602
(312) 368-7984

Springfield
601 N. First Street
Springfield, IL 62702
(217) 522-9850

Paid for by the 6th District Mondale Delegate Committee

1334

WALTER MONDALE



THE EXPERIENCE TO KNOW WHAT WE NEED TO CHANGE... THE STRENGTH TO MAKE IT HAPPEN

merica must be number one ag
in international competition America
must be just again a nation not for
the rich alone, but for everyone
America must use its strength for
peace again, and lead the world back
from the brink A future of growth
fairness, and hope that is why I seek
the presidency Walter F Mondale



A Competitive America

Walter Mondale wants to get our nation's competitive edge back. Our economy was once the strongest, most productive on earth. But today America's best jobs are being exported, basic industries are declining, farm products can't compete in world markets and small businesses are shut off from affordable credit.

Mondale believes we must **chop the Reagan deficits** to reduce interest rates; **fight for fair trade** so that America begins to get an even break against foreign competition; **revitalize our basic industries and infrastructure** to insure that "Made in America" once again means the best; **invest in people** to make this next generation of Americans the best-educated and trained in our history.





A Fair America

Mondale thinks it's time to restore the basic American values of fairness, decency and opportunity to government policy. We need to **close the tax loopholes and catch the tax cheaters** so that every corporation and every individual pay their fair share; **enforce our civil rights laws** and redouble our efforts to gain **equal rights for women**—with a Constitutional Amendment to back it up; **protect Social Security and Medicare;** lighten the load on the hungry, the handicapped and the unemployed. Mondale will **fight for the average American** who is confronted with rising utility bills, tuition fees and interest rates, and bring an end to government of the rich, by the rich, for the rich.

A Safer World

Mondale will keep America strong and use that strength to wage peace and prevent war.

We need a President who sees the world as it really is; who understands that we should use force as a last, not a first resort; who recognizes the necessity of reducing the risk of nuclear war.

Mondale will be that President. He will **stabilize relations with the Soviets** by meeting them on the common ground of global survival; **maintain a strong defense,** while keeping the Pentagon in check; **work with our allies** while negotiating with our adversaries. Mondale will speak up for American principles by demonstrating that the United States not only stands tall, but stands by its values.



JACK L. BRIGHT



CERTIFIED

P 670 956 334

MAIL

8504050I523



CHARLES N. STEELE, GEN'L. C
FEDERAL ELECTION COMMISSION
1325 K STREET, NW
WASHINGTON, DC 20463

RECEIVED AT THE FEC
6 a.m. 3341

84 MAY 29 P 1:08

Sixth Congressional District
Mondale Delegates' Committee
478 Washington Street
Elmhurst, IL 60126

May 21, 1984

MUR 1667
Memo

AM: 35
AM: 36

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Charles N. Steele, General Counsel
Federal Election Commission
Washington, DC 20463

Dear Mr. Steele:

I am in receipt of yours of May 11, 1984.

The 6th District Mondale Delegate Committee and I, as treasurer, do hereby affirm that we are not in violation of any sections of the Federal Election Campaign Act of 1971 as amended.

Our committee has acted autonomously and independently of the Mondale campaign as attested to by the attached material:

(1) Our 6th District brochure.

(2) Our request for contributions letter.

(3) A copy of the ad placed in the ad book for the York Township Democratic Party annual St. Patrick's week dinner.

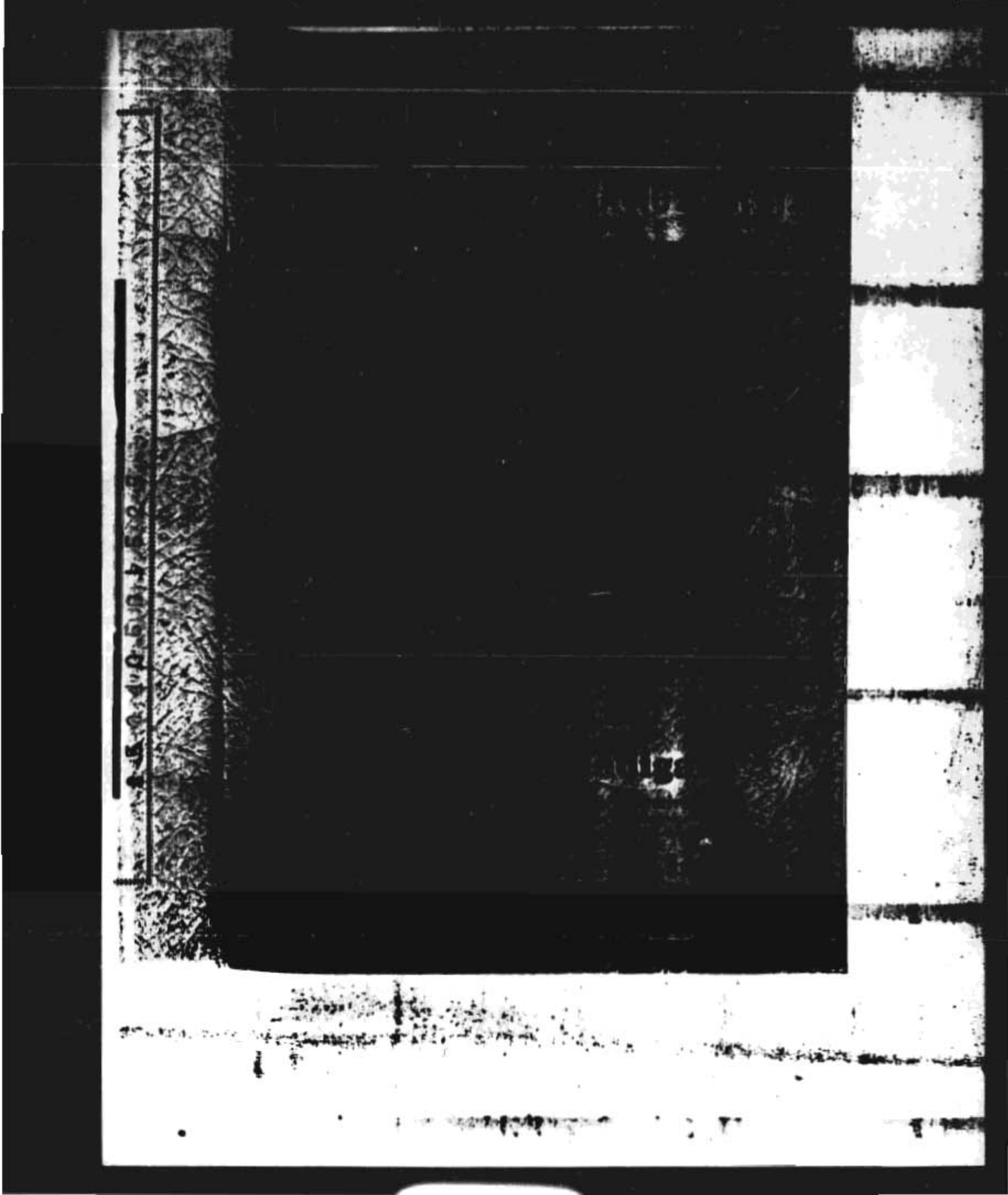
(4) A copy of the DuPage Democrat monthly newspaper with our ad (placed jointly with the 13th District Mondale Delegate Committee) on page 4.

Furthermore, I am enclosing a copy of a letter from one of our delegates, Ms. Jane Spirgel, reimbursing the PAC via the committee for her approximate portion of the PAC money. Also, a copy of my letter to the PAC returning the funds leftover from our campaign.

Sincerely,

JACK L. BRIGHT,
Treasurer

3504050152 4



WALTER MONDALE





6th District Delegates
HERBERT "BUD" LOFTUS
DIANA B. SHEFFER
JANE N. SPIRGEL
TONI KANE (Alternate)



13th District Delegates
JOHN E. DVORAK
JOAN P. MURPHY
J. GLENN SCHNEIDER
JEAN C. TELLO (Alternate)

VOTE FOR THE MONDALE DELEGATES

"We want to thank our many York Township supporters for their efforts on behalf of the campaign for WALTER MONDALE."

3504050I526

6th Congressional District Delegates for MONDALE

committee

Dear Friend,

We four are the Walter Mondale pledged delegates to the Democratic National Convention. We are writing to tell you of our resolve to help Fritz Mondale restore a national commitment to peace, fairness, and compassion, and to ask you to join with us.

Democrats and other concerned citizens are mobilizing as never before to stop Ronald Reagan's assault on the conscience and safety of Americans. We firmly believe that the right person to lead that effort is Walter Mondale. In order for that to happen, Mondale pledged delegates must be elected in the Illinois Democratic Primary, on March 20th.

Fritz Mondale brings to this campaign a combination of experience, ability, and vision that is unmatched by other candidates. Mondale alone has demonstrated the broadly based appeal to working people, educators, women, and the disadvantaged, which has always been both the hope and the promise of the Democratic Party.

We are honored to represent Fritz Mondale in this Congressional District and eager to begin our effort. We ask you to help us by contributing to the cost of the local campaign. While the National/State Mondale organization will finance radio and television advertising, the delegate committee in each district must be responsible for brochures, mailings, and phone banks. Of course, we would welcome your active participation in the campaign as well.

Thank you for your consideration. Please make checks payable to:

~~Jack L. Jr.~~ ~~c/o Charles Hickman,~~ Treas.

6th District Mondale Delegate Committee
~~522 Monarch Lane~~ 472 WASHINGTON ST.
~~Addison, Illinois~~ GLENDALE IL. 60139

Kindest personal regards,

Bud Loftus
Bud Loftus
Former State Representative

Jane Spirgel
Jane Spirgel
Member DuPage County Board

Diana Sheffer
Diana Sheffer
Chicago Teachers Union, Local #1 AFT, AFL-CIO

Toni Kane
Toni Kane
Illinois Education Association

Authorized and paid for by the 6th Congressional District Delegates for Mondale Committee.

A copy of our report on file with the Federal Election Commission, Washington, D.C.

opeiu/28/cm

3504050152 7

Jane Spirgel
334 River Glen
Elmhurst, Illinois 60126

May 16, 1984

Mr. Jack Bright, Treasurer
6th District Mondale Delegates Comm.
478 Washington,
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Thank you for your attention to this matter.

Sincerely,

Jane Spirgel

Jane Spirgel

3504015028

Sixth Congressional District
Mondale Delegates' Committee
478 Washington Street
Elmhurst, IL 60126

May 21, 1984

Rachelle Horowitz, Director
American Federation of Teachers and
the Chicago Teachers' Union
11 Dupont Circle, N.W.
Washington, DC 20036

Dear Ms. Horowitz:

First of all, I want to belatedly acknowledge and thank you for the $1,000.00 contribution to the 6th District Mondale Delegate Committee.

I am happy to report that all of our delegates won in the primary and will be going to the Democratic National Convention in San Francisco in July.

Since our activities are concluded, we are pleased to enclose our check in the amount of $411.76. This amount consists of the balance in our treasury plus $200.00 from one of our delegates, Ms. Jane Spirgel, as explained in the attached copy of her letter.

Thanks again.

Sincerely,

Jack L. Bright

Jack L. Bright,
Treasurer

35040501529



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MONDALE ALTERNATE

(VOTE FOR 1)

- ☐ **TONI R. KANE** (MONDALE)

MONDALE

ILLINOIS FOR MONDALE

Chicago
30 W. Washington, #530
Chicago, IL 60602
(312) 368-1984

Springfield
601 N. First Street
Springfield, IL 62702
(217) 522-9850

Paid for by the 6th District Mondale Delegate Committee

1334

WALTER MONDALE



THE EXPERIENCE TO KNOW WHAT WE NEED TO CHANGE... THE STRENGTH TO MAKE IT HAPPEN



A Competitive America

Walter Mondale wants to get our nation's competitive edge back. Our economy was once the strongest, most productive on earth. But today America's best jobs are being exported, basic industries are declining, farm products can't compete in world markets and small businesses are shut off from affordable credit.

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DU PAGE DEMOCRAT

ISSUE NO. 240 MARCH 1984

25 CENTS/ COPY: $3.00/YEAR

A MONTHLY NEWSPAPER COVERING DEMOCRATIC NEWS AND OPINION IN THE FAR WESTERN SUBURBS. PUBLISHED AND SUBSIDIZED BY THE LOMBARD DEMOCRATIC CLUB. TRUMAN KIRKPATRICK, PRESIDENT.

8504015032

HOW SHOULD DEMOCRATS MAKE CASE VS. REAGANOMICS IN 1984 CAMPAIGN?

ECONOMICS PROF. ADUDDELL TO SPEAK AT DEMOCRATIC CLUB MEETING MAR. 16

Loyola University economics professor Robert Aduddell will make his third visit to the Lombard Democratic Club on Friday evening, March 16, to talk and answer questions about the best ways Democratic campaigners can argue against the economic programs of the Reagan administration.

The meeting, the regular monthly meeting of the Lombard Democratic Club, will begin at 8 P.M. March 16 in Room 7, the downstairs meeting room, of the Lombard Community House, Grace Street and St. Charles Road, Lombard.

Dr. Aduddell will begin with a speech about Reaganomics and its evils. He will be followed on the speakers' platform by Dr. Robert Renshaw, the Democratic candidate for U. S. Congress from the 6th Congressional District who is also an economics professor, teaching at Northern Illinois University, DeKalb. Dr. Renshaw will give a commentary on the main speech.

Another commentary on the opening speech by Dr. Aduddell will then be given by Jane Spirgel, the lone Democratic member of the DuPage County Board, who also is teaching economics courses--at the Midwest College of Engineering.

The floor will then be open for questions and comments from the audience. The question period will be moderated by Lombard Democratic Club president Truman Kirkpatrick.

It is hoped that the result of all this talking about economic problems will be to equip several local Democrats with enough arguments and factual knowledge to permit them to challenge effectively the right-wing economic views of the local Republican party and thus increase the chances for Democratic candidates in the November election.

After the discussion, the Club will have a social hour with refreshments. The meeting is open to the public.

ADUDDELL

Robert Aduddell is an Associate Professor of Economics at Loyola University, where he has taught for the last 19 years. He holds a Ph.D. degree in economics from Northwestern University.

He worked as a consultant with Governor Thompson's Cost Control Task Force in 1977.

In recent years, Dr. Aduddell

(Continued on Page 2)

Tax Fiasco Shows Need for 2-Party System—Redmond

The $150,000 extra cost to send DuPage County tax bills out on time demonstrates the failure of one-party county government, William A. Redmond, county Democratic chairman, said February 24.

"Early last week, county officials announced it would be impossible to mail the bills by May 1, as required by law," said Redmond. "The reaction from school districts was immediate. The schools reported that the tardiness would cost them millions, because they would have to borrow money and pay interest to meet their payrolls.

"So, a week later, county officials said that the bills would go out on May 1 after all, but it would cost the taxpayers $150,000 more anyway, to rewrite computer programs and pay more to employees, mostly in overtime premiums.

"The new plan is to do what Cook County already has been doing--mail a bill on May 1 which would be half of last year's bill, and follow with a final installment in August,

(Continued on Page 2)

DuPAGE DEMOCRAT

Published monthly at Lombard, Illinois, by the Lombard Democratic Club. Second-class postage paid at Lombard, Illinois.

Truman Kirkpatrick, Editor, 663 Rochdale Circle, Lombard, Illinois, 627-6302. All communications should be addressed to the editor.

Regular membership in the Lombard Democratic Club is $5.00 per year, including a subscription to the *DuPage Democrat*. Supporting membership is $10.00 per year, including a subscription to the *DuPage Democrat*. Nonmember subscription to the *DuPage Democrat* is $3.00 per year.

CLUB OFFICERS

President: Truman Kirkpatrick, 663 Rochdale Circle, Lombard, IL 60148. 627-6302.

Vice-president: William J. Moore, 4025 Belle Aire Lane, Downers Grove, IL 60515. 960-3036.

Secretary: LouAnn Ulanowski, 500 S. Fairfield Ave., Lombard, IL 60148. 629-7515.

Treasurer: Evan B. Karnes, 3617 York Court, Woodridge, IL 60517. 964-8250.

EXECUTIVE COMMITTEE

Kathleen Benard, 1021 S. Highland Ave., Lombard, IL 60148. 629-0081.

Walter R. Brady, 660 W. Forest, West Chicago, IL 60185. 231-0872.

Roger M. Dunn, 1906 E. Willow Ave., Wheaton, IL 60187. 668-1082.

Carol Esmerde, 23W395 Woodview Drive, Medinah, IL 60157. 529-6063.

Phyllis Lasher, 1070 S. Fairfield Ave., Lombard, IL 60148. 627-2909.

Rafael (Ralph) Monsivais, 6006 S. Williams, Downers Grove, IL 60516. 852-6879.

Rose Pycha, 136 E. Maple Ave., Lombard, IL 60148. 963-2590.

John R. Randle, 306 Spruce Lane, Glen Ellyn, IL 60137. 858-8796.

Diane Rzeszewski, 128 E. Hickory, Lombard IL 60148. 495-1854.

Robert L. Sealy, 688 High Road, Glen Ellyn, IL 60147. 469-3041.

Marilyn Seitz, 218 8th St., Downers Grove, IL 60516. 964-8256.

Carl Wilhelmi, 171 S. Craig Place, Lombard, IL 60148. 627-3486.

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The Lombard Democratic Club is a free association of Democrats and democratic people working for the organizational success of the Democratic Party, and people who want more justice and equity in American society. Most of its members recognize political action as the proper way to work for a better America, and see the Democratic Party as the most hopeful political instrument for bringing integrity, good government, compassion, liberty and fairness to our country. There is no ideological requirement for Club membership, and anyone who resides within driving distance of Lombard is eligible to join.

The Lombard Democratic Club meets on the third Friday of each month at the Lombard Park District Community House, Grace Street and St. Charles Road, Lombard, IL 60148.

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ADUDDELL

(Continued from Page 1)

has presented a series of economic forecasts each year to Loyola's Graduate School of Business. He has also presented economic forecasts before the Chicago Association of Commerce and Industry. He has had his economic analyses published in both the academic and trade press.

Politically, Prof. Aduddell worked as an advisor in the statewide electoral campaigns of Michael Howlett and Alan Dixon. In 1980, he was a candidate of the Democratic Party for member of the DuPage County Board.

RENSHAW

Robert Renshaw has taught economics at Northern Illinois University since 1965. He holds degrees from Michigan State University and the University of Michigan. He has been active in Democratic politics, having been a candidate for Illinois Senate twice, in 1970 and 1972, and for Congress in 1974.

Renshaw has just issued a leaflet of campaign literature in which he warns of the dire consequences of continuing large deficits in the federal budget. He warns that continued government borrowing displaces private investment, resulting in high interest rates, reduced rates of capital formation and diminished economic growth. He warns that Congress has not acted responsibly in these matters.

SPIRGEL

Jane Spirgel holds a Master's degree from Northern Illinois University in Public Affairs. She was elected to the DuPage County Board in 1974 with three other Democratic candidates, and by virtue of hard campaigning, has won re-election in 1978 and 1982; for the last six years she has been the only Democrat on the 25-member Board.

Her comments are always useful.

All Democrats are invited to attend the March 16 meeting.

COUNTY BOARD

County Board member Jane Spirgel urges all readers of the DuPAGE DEMOCRAT to attend the next evening meeting of the DuPage County Board, scheduled for 7:30 P.M. on Wednesday, March 28. If we continue to show our interest, the Board will be more likely to schedule other evening meetings. At the evening meeting in Janjary, Chairman Jack Knuepfer opened the floor for comment by the public. Although there is no formal commitment to open the floor at the March 28 meeting, it is a likely possibility. So please attend!

REDMOND

(Continued from Page 1)

adjusted to reflect the higher tax for the year.

"When county board members, the county clerk, the county treasurer, the county supervisor of assessments, and the nine township assessors are all playing on the same team, the taxpayers don't know where the ball is until the run is scored.

"The county officials say the assessors didn't reassess the property fast enough and didn't assess uniformly at the 33 percent of market value required by state law.

"So, the board of review will have to spend three more weeks to adjust the assessments and make them uniform between townships.

"The assessors say the legislature changed the law, so the assessors had to so some work twice.

"Maybe a medal for candor should be awarded to the Addison township assessor. To explain why he assessed at only 20 percent of market value, he said: 'Basically, I was trying to make myself look good.'

"If his associates in the assessing were equally candid in explaining their part, they would say: 'Basically, I wouldn't want to make myself look bad.'

"If this county had members of both parties in public office, turning the searchlight on what is happening, the taxpayers would see a crisis approaching before it explodes. And we would all benefit from better service for less money."



3504050I534

DEMOCRATIC NEWS

DOWNERS GROVE

The monthly meeting of the Downers Grove Township Regular Democratic Organization will be at a new time and place, reports township chairman Bill Moore. The meeting will be on Wednesday, March 14, at the Hinsdale Community House, 8th and Madison, Hinsdale, with a social hour and refreshments at 7:30 P.M. and a business meeting from 8:00 to 10:00. Guest speaker will be Cal Sutker, the new chairman of the Democratic State Central Committee.

Everyone is welcome to attend the meeting.

LISLE

For the Lisle Township Democratic Organization, Marcia Harris reports a form letter is being prepared, to help precinct committeemen make voting recommendations to their voters; the letter will be available from township chairman Ron Harris after March 9.

The *Suburban Life News Graphic* has endorsed Ron Harris and Glenn Schneider as delegates to the Democratic National Convention from the 13th District.

Marcia Harris has been endorsed for county coroner by Du-PACE.

March is membership month for the Lisle Township Democratic Organization. Dues of $10 per individual or $15 per family include a subscription to the DuPAGE DEMOCRAT. Dues should be sent to Don O'Connor at 1105 N. Loomis, Naperville, IL 60540.

Next meeting of the organization will be on March 27, at 8 P.M., at the home of Dorothy Stahl. There will be a discussion of election results, and printouts of local election returns will be available. For directions for getting to the meeting, call 968-1828 or 971-2494.

YORK BANQUET MARCH 18

Michael J. Madigan, Speaker of the Illinois House of Representatives, will be the guest of honor at the annual corned beef and cabbage dinner of the York Township Democratic Central Committee on Sunday, March 18, 1984.

Dan Smyth, of Lombard, township Democratic chairman, said that the dinner will be at 7 P.M., in the Ambassador banquet hall, 110 W. North Ave. (at York Road), Elmhurst.

Michael J. Howlett, former Secretary of State and 1976 candidate for Governor, will be master of ceremon-

(Continued on next page)

(advertisement)

TRAVEL AGENT
KAY "TINKER" HARVEY
969-5737 AFFILIATED WESTON TRAVEL

DEMOCRATIC NEWS

(Continued from Page 3)

lee. The Paulist Choir Alumni Chorale, directed by George Barrett, of Darien, will sing.

"Speaker Madigan is a strong favorite, and effective friend, of York Township Democrats," said Smyth. "Since the Cutback Amendment abolished minority representation in House districts, there has been no Democratic legislator from DuPage County in the General Assembly. We have to depend on our statewide leader to look after our interests.

"The Speaker has led in legislation for health care, social services, education, and all the basic objectives of our party. This will be his first appearance before our organization. We expect a goodly crowd to meet him and hear him."

The Speaker will be introduced by William A. Redmond, DuPage Democratic chairman, who was Madigan's immediate predecessor as Speaker. Redmond served three terms as Speaker near the close of his 23-year career in the House.

Smyth said tickets to the event may be obtained from any York Township Democratic precinct committeeman, or from Karen Rothermel, dinner chairman, 107 Elm Tree Lane, Elmhurst, 834-6186.

WALTER MONDALE
FOR PRESIDENT

Support the Delegates Who Support Mondale

The 6th District Mondale Slate

(VOTE FOR 3)

- HERBERT J. "BUD" LOFTUS (MONDALE)
- DIANA B. SHEFFER (MONDALE)
- JANE N. SPIRGEL (MONDALE)

(VOTE FOR 1)

- TONI R. KANE (MONDALE)

The 13th District Mondale Slate

(VOTE FOR 3)

- JOHN E. DVORAK (MONDALE)
- JOAN P. MURPHY (MONDALE)
- J. GLENN SCHNEIDER (MONDALE)

(VOTE FOR 1)

- JEAN C. TELLO (MONDALE)

(Paid political advertisement)

YOUNG DEMOCRATS CANDIDATES' NIGHT MARCH 14

DuPage County Young Democrats are holding a "Candidates' Night" on Wednesday, March 14, at the Elmhurst Country Club, 4N560 Wood Dale Road, Wood Dale, from 7:30 to 10:30 P.M. The general public is invited.

Rick Brass, who is responsible for the publicity for the Young Democrats, tells us that all Democratic precinct committeemen in the county, and all candidates for county, state, and national office in the upcoming election have been invited to be present and to speak. State representative candidates, state senatorial candidates, U.S. Senate candidates, and presidential candidates have been invited and a number of them are expected to be present. Of the U.S. Senate candidates, Roland Burris has accepted the invitation and others may follow suit.

Admission to the event is free; there will be a cash bar. Candidates will have an opportunity to display their literature and to meet and greet the public.

WOMEN'S TRUTH SQUAD ON REAGAN

The DuPage East chapter of the National Organization for Women has a "Women's Truth Squad on Reagan" which has taken on the job of keeping track of the more outrageous falsehoods uttered by Ronald Reagan and supplying people with the answers. Judy Gracious Curin is heading up the effort. Anyone interested in working on this issue or in having more information should contact her at 960-3102.

Darline Peterson, the 1984 president of the DuPage East N.O.W. chapter, is serving as the acting Democratic precinct committeeman of Precinct 6, York Township.

HART AND MONDALE CAMPAIGNS FOCUS ON DuPAGE DEMOCRATS

The surging Hart-for-President campaign in DuPage County has just acquired a headquarters, a set of telephones, a DuPage County coordinator, and a new set of candidates for the Democratic National Convention pledged to Hart.

The headquarters has just been opened at 18W787 22nd St., Lombard, phones 620-6284 and 620-7443. The coordinator is Sherry Hayes of Roselle. The new candidates for delegate pledged to Hart in the 6th District are the three candidates formerly pledged to Alan Cranston, who switched their allegiance to Gary Hart immediately after Cranston pulled out of the presidential race on February 29; they are Truman Kirkpatrick, Wendy Georges and LeRoy Kennel. The Cranston alternate delegate candidate, Dorothy Yetter, also switched and is now a Hart alternate.

Not to be outdone, the Mondale campaign has opened a 6th District headquarters at 1001 W. Lake Street, Addison. The phone is 543-3010 and the campaign coordinator is Ron Holzacker.

The reason for the intensified activity is obvious. Until a few days ago, most people had assumed that the Democratic presidential choice would be pretty well determined before the Illinois primary. Now Illinois appears to be important and the outcome here uncertain. So both campaigns are running hard in Illinois. It is quite possible that one or more of the presidential candidates themselves will visit DuPage County on short notice within the next few days.

DuPAGE DEMOCRAT subscribers are invited to make their choice of candidate and then to get into the battle, if they are not involved already.

JOKE CORNER

A motto for a former president:

If at first you don't succeed, destroy all evidence that you tried.

And one that the present occupant of the White House knows all too well:

The secret of success is sincerity. Once you can fake that, you've got it made.

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LaRouche

Do you know why Richard Nixon stepped down as President of the United States in 1974?

He was forced out of office by the British Empire, which moved against him because he was starting to interfere with the drug traffic with which Britain makes slaves out of U. S. citizens. The British couldn't tolerate that.

That's the Watergate story according to Lyndon LaRouche, in a book prepared by a team under his direction. The book is "Dope, Inc.: Britain's Opium War Against the U.S." It describes how Britain, the "Great Satan" of nations, has spent the last 800 years corrupting the world with dope so that it could rule over the other countries.

Had Nixon not launched an effort to shut down the traffic in drugs, "it is likely that he would not have been unceremoniously forced out of office by Henry Kissinger, Ted Kennedy, and their British masters."

That is an exact quotation from Page 51 of "Dope, Inc." It is a typical sample of the bizarre, kooky ideas that permeate the speech and writings of the LaRouche cult.

Here are some things you should know about LaRouche and his disciples.

1. *Their ideas are strange.* They assert, for example, that all eight of the Democratic presidential candidates this year--Askew, Cranston, Glenn, Hart, Hollings, Jackson, McGovern and Mondale--are agents of the Russian secret service, the KGB.

2. *They are numerous and well-organized.* They have enough supporters to put out an eight-page newspaper twice a week. They distribute their literature in airports like O'Hare, in front of public buildings like the Lombard and Wheaton postoffices, at intersections like Butterfield and Highland, and door-to-door in DuPage County.

3. *They may be dangerous.* The exposé of the LaRouche cult on NBC-TV's "First Camera" program March 4, 1984, reported that LaRouche followers had drilled at a privately-owned guerrilla warfare school in Georgia, where the equipment (according to other sources) includes machine guns with silencers. "First Camera" also showed an unidentified witness who said LaRouche was involved in a plot to assassinate President Jimmy Carter, Zbiginiew Brzezinski, and other officials.

4. *They have ties to some high Reagan administration officials.* On the "First Camera" program, Dr. Norman Bailey, identified as a special assistant to President Reagan on the National Security Council, appeared on camera to say that "they [the LaRouche people] have, in my view, one of the best private intelligence services in the world, so that to me it was useful to talk to them; they are very strongly in favor of certain programs that the Administration is in favor of, also."

5. *They are here, taking part in DuPage County politics, trying to win leadership positions in the Democratic Party.* They have a candidate for U.S. Senate on the ballot, Gerald Rose. They have candidates for U.S. Congress in all three districts which include DuPage--Warren Jewel in the 6th, Carl Schoeppel in the 13th, and Eugene Mabeus in the 14th. And they have candidates for Democratic committeeman in at least 30 precincts.

The March 20 primary is their big day. Let us urge everyone to take a Democratic primary ballot and be sure to vote against the LaRouchies.



ELECT

PHILIP J. ROCK

TO THE UNITED STATES SENATE

ENDORSED BY: ILLINOIS STATE DEMOCRATIC CENTRAL COMMITTEE
DuPAGE COUNTY FEDERATION OF LABOR

"He takes responsibility;
He answers questions directly;
He gets things done."

--William A. Redmond
Chairman,
DuPage Democrats for Rock

THE BEST FRIEND WE DEMOCRATS OF DuPAGE COUNTY EVER HAVE HAD IN THE ILLINOIS SENATE

VOTE DEMOCRATIC TUESDAY, MARCH 20, 1984.

(Paid political advertisement)

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Book Review

WITH ENOUGH SHOVELS: REAGAN, BUSH AND NUCLEAR WAR. By Robert Scheer. Updated paperback edition, November 1983. Vintage Edition, Random House Books, New York. 304 pages. $4.95.

The DuPAGE DEMOCRAT has already reviewed this book--last year, when it first came out in a hardbound edition for $14.95. Now an updated paperback version is easily available, and we renew our advice: get this book and study it.

The title of the book, of course, refers to the idiotic statement by a Reagan administration official that people do not need to worry about the radioactive fallout in a nuclear war because they can dig holes, crawl in, put dirt over the holes, and be protected. "With enough shovels, we can do it!" he said.

The book's conclusion is that Ronald Reagan has surrounded himself with a team of Dr. Strangeloves, rightwing ideologues who believe that a nuclear war can be won and who are hellbent to get on with it.

When following the newspaper accounts of arms control negotiations, it is most useful to be reminded that "negotiator" Paul Nitze recommended "that U.S. leaders constantly put forth reasonable-sounding disarmament proposals which the Soviets were unlikely to accept." If the Russians started to show flexibility, we would have to back off.

Now that the book is easily available, at an affordable price, everyone who plans to campaign against Reagan this fall should get a copy and be ready to use it to show doubters just how dangerous the man in the White House really is.

LETTERS TO THE EDITOR

WATCH OUT FOR REAGAN ON SOCIAL SECURITY AND MEDICARE

To the Editor:

I feel it is time to point out again the progressive achievements of the Democratic Party over the last 50 years--or at least a few of the achievements that gave us a safer and more prosperous life, particularly those of us who have achieved Senior Citizen status.

We who have lived through the Depression of the 1930's remember the havoc of some 9000 banks going broke, and the effect of not knowing what the future would hold. The Republican policies had all but destroyed our monetary system, and, needless to say, this condition affected rich and poor alike.

This was the condition when Franklin D. Roosevelt was elected. And the first thing he did was to close all the banks and reorganize our financial structure by having the Federal Deposit Insurance Act made into law. This action guaranteed the savings of all the people, both rich and poor. Just imagine what would have happened to our savings if this law had not been in effect last year, when a great many banks went broke. Not one person lost their savings, except for a small uninsured bank in Iowa which did not believe in insurance.

Later, in 1936, President Roosevelt persuaded Congress to enact the Social Security Law that helped people who were retired. The amount provided at first was small, but so were the wages. At that time $22.50 per week was a normal wage. This was before the unions helped increase wages. At that time, the amount of Social Security was $35 per month. This, of course, was increased as wages were increased.

Until now, Social Security has been a major part of the middle-income person's retirement plan. Mr. Reagan gave this part of our retirement a slight reduction this past year, and if he is re-elected this fall he will cut back on Social Security both for present retirees

(Continued on next page)

YOU

can vote for delegates pledged to

GARY HART FOR PRESIDENT

even though no one was pledged to Hart when petitions were first filed.

In the 6th Congressional District,

TRUMAN KIRKPATRICK (Cranston) 65--
WENDY GEORGES (Cranston) 66--
LeROY KENNEL (Cranston) 67--

who are on the ballot as Cranston delegates, are supporting HART now that Cranston is out of the race.

A VOTE FOR THESE CANDIDATES IS A VOTE FOR GARY HART.

Please tell everyone who wants to vote for HART delegates: in the 6th District, vote for Kirkpatrick, Georges and Kennel.

(Paid political advertisement)

JOIN THE LOMBARD DEMOCRATIC CLUB! (OR RENEW YOUR MEMBERSHIP FOR ANOTHER YEAR)

Send this coupon to LOMBARD DEMOCRATIC CLUB, 663 Rochdale Circle, Lombard, IL 60148.

☐ I enclose $5 for a one-year membership in the Lombard Democratic Club (DuPage Democrat subscription included)

☐ I enclose $_____ ($10 or more) for an annual Supporting Membership (DuPAGE DEMOCRAT subscription included)

☐ Don't put me down as a member, but send me the next 12 issues of the DuPAGE DEMOCRAT. I enclose $3.

☐ I enclose $_____, for which please send gift subscriptions to the DuPAGE DEMOCRAT (at $3 each) to the attached list of names.

NAME _____

ADDRESS _____

_____

_____

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LETTERS TO THE EDITOR

(Continued from Page 7)

and for the ones who will retire in the future. He has already stated that he will cut back on "entitlement programs," mostly Social Security, in order to provide more money for the Pentagon for armaments. Everybody should vote as they see fit, but if they want to protect their own retirement they must vote Democratic.

As for Medicare, this has helped millions of people live a better life. When President Truman first proposed this program, it was fought tooth and nail by the medical profession. As a matter of fact, President Reagan, who was then an actor, was hired by the medical profession to travel all over our country to tell people how much harm Medicare would do by "keeping people healthy." Medicare did not become law until Lyndon Johnson became president.

Congress has made this plan for the elderly into a catch-all for a large number of other things besides medical and institutionalized care for our older citizens.

It is difficult to understand why medical and institutionalized care for our older citizens are being attacked by the Republicans in this country which is reputed to be the wealthiest in the world. We hear so much from our leaders that it is costing too much, when as a matter of fact, we are doing much less for our elderly than most countries such as Germany, France, England and Canada. It does not seem to be a political football in those countries.

To retain Medicare, some changes must be made in the plan so that doctors and hospitals are compelled to make a more realistic charge for their services.

In order to retain these programs, you must vote for a person in sympathy with these programs. And the present incumbent of the White House has indicated that these programs should be reduced or eliminated after the 1984 election.

Think of these things and vote Democratic.

--Walter Brady



TROUBLE--RIGHT HERE IN WAYNE TOWNSHIP

To the Editor:

I am angry and concerned. The purpose of this letter is to see if it is possible to evoke an enthusiastic response to winning an election at the local level. I realize that the township elections are not for several months, but I think we all know that to win an election, efforts must be made in advance.

The statement "Everyone knows the Democrats can't win a local election in DuPage County" is now a fallacy. The Democrats can beat the Republicans in Wayne Township!

If we had dreamed up the perfect plan for getting the Republicans out of township government, what has happened in Wayne Township would be a dream come true. Some of the past events have included:

The trustees sued the Supervisor (52 count indictment.) The Supervisor sued the Road Commissioner. The trustees sued the Town Clerk. The trustees took over the office space and left the Supervisor to function from his home. An employee, receiving a meaty salary, no longer reports for work. Many of the Supervisor's pet programs have either been cut loose from the township or disbanded, as in the case of the Mounted Patrol. Over $12,000 was spent in 1983 on legal fees. And more is still to be churned up in the next few months. There are actually three Republican parties vying for power; one boasts bumper stickers which read "Join the Revolution!"

The people are crying for the Democrats to come to the meetings, get involved, help the lowly taxpayers make order of this mess.

One year of concentrated effort and time would mean four years of Democrats in leadership positions in Wayne Township. Is no one interested? Are there no viable candidates and interested citizens?

--A challenge, issued by a disillusioned Democrat, Rhea D. Vytlacil

THE NEW EXTREMISTS ARE LIKE THE OLD ONES

To the Editor:

Bill Redmond is correctly concerned about the infiltration techniques of extremists. Read the John Birch Society "Blue Book" from the 1950's, to find all the same methods and same right extreme paranoia, still at work, with probably the same people involved.

--Marge Blake

DuPAGE *DEMOCRAT*

ISSUE NO. 240 MARCH 1984

TRUMAN KIRKPATRICK, EDITOR
663 ROCHDALE CIRCLE
LOMBARD, IL 60148

SECOND-CLASS POSTAGE PAID AT LOMBARD, ILL.

ADDRESS CORRECTION REQUESTED

MEETING MARCH 16

3504015539

J. L. BRIGHT
470 S. WASHINGTON ST
ELMHURST IL 60126

[redacted]

[redacted]



[redacted]

CERTIFIED
No. 285015

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Jack L. Bright, Treasurer
Sixth District Mondale
Delegate Committee
478 Washington Street
Elmhurst, IL 60126

Re: MUR 1667

Dear Mr. Bright:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

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

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

If you intend to be represented by counsel in this matter please advise the Commission by 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.

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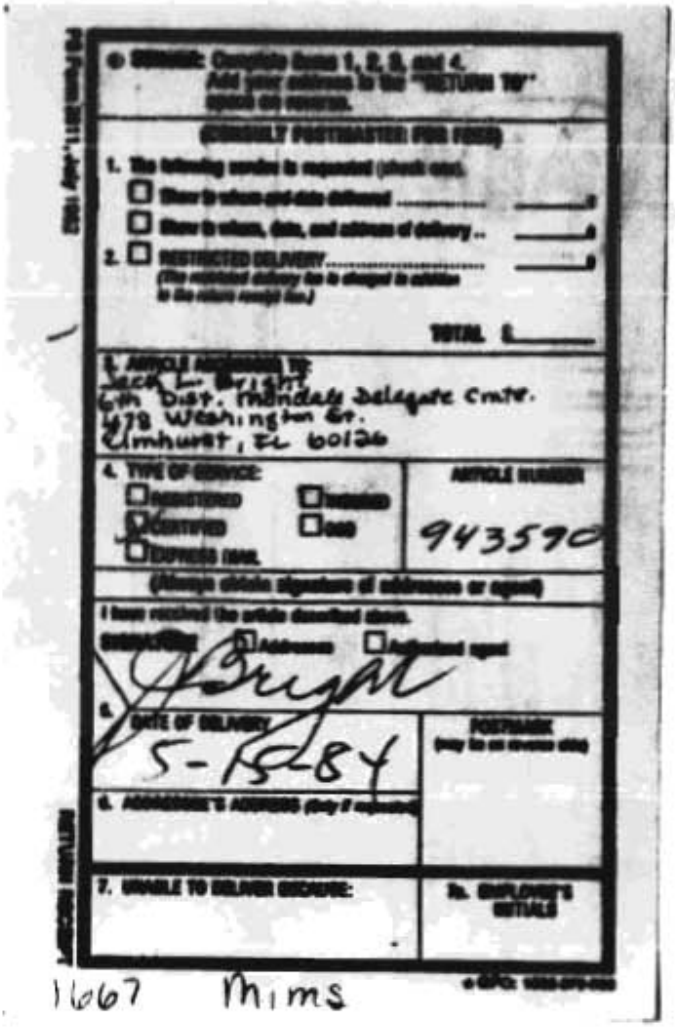
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

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



3504005015542

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(312) 346-6600
CABLE ADDRESS "FREEZON"
TELEX 254083

MICHAEL D. SHER
DIRECT TELEPHONE NUMBER
(312) 269-6005

July 11, 1984

Stephen Mims, Esq.
Federal Election Commission
1325 K Street, N. W.
Washington, DC 20463

Re: MUR 1667 / MUR 1704

Dear Mr. Mims:

As you requested during our telephone conversation of June 29, this will advise you that the 4th District Delegate Committee has not received nor expended any funds since July 5, 1984, the last day of the reporting period covered by the Termination Report filed by that Committee with the Commission in July, 1984. This will further advise you that as of July 1, 1984, the 4th District Delegate Committee had no funds in its accounts.

This information is being voluntarily provided to the Commission by the Committee and is provided without prejudice to any and all rights which that Committee has or may have. This will also reaffirm the position previously expressed in my letters to the Commission dated June 8 and June 27, 1984. To date, I have not received a response to either of those letters.

Very truly yours,

Michael D. Sher

Michael D. Sher

MDS:ji

cc: Terrie L. Hanus

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(312) 348-8500

CABLE ADDRESS "FREEZOR"

TELEX 254083

MICHAEL D. SHER
DIRECT TELEPHONE NUMBER
(312) 269-8009

June 14, 1984

84 JUN 15 P1:20

FEDERAL EXPRESS

Charles N. Steele, Esq.
General Counsel
Federal Election Commission
1325 K Street, N. W.
Washington, DC 20463

Re: MUR 1704 / Consolidated Response of Mondale Delegate Committees from the Third, Fourth, Seventh, Ninth, Eleventh, Fourteenth, Seventeenth, Twentieth and Twenty-First Districts (Illinois)

Dear Mr. Steele:

Enclosed are the Statements of Designation of Counsel which designate me as counsel for each of the above-referenced Mondale Delegate Committees from the State of Illinois (the "Delegate Committees") in MUR 1704. This letter is submitted to the Federal Election Commission (the "Commission") on behalf of the Delegate Committees in response to the Complaint filed with the Commission by the National Right to Work Committee and Ralph Martin (Bud) Hettinga, Jr. on May 18, 1984 (the "Complaint").

The Complaint does not name or designate any of the Delegate Committees as respondents and, accordingly, the Commission should not consider the Delegate Committees as respondents in this proceeding. Section 111.4 of the Commission's regulations requires that each complaint which is filed with the Commission must "clearly identify as a respondent each person or entity who is alleged to have committed a violation" and must "contain a clear and concise recitation of the facts which describe a violation of a statute or regulation over which the Commission has jurisdiction." 11 C.F.R. § 111.4(d)(1) and (3); see also 2 U.S.C. § 437g(a)(1). Neither the caption nor the content of the Complaint designates any of the Delegate Committees as respondents. Moreover, the Complaint fails to recite any facts which describe a violation by any one or more of the Delegate Committees of any "statute or regulation over which the Commission has jurisdiction." Accordingly, at least insofar as the Complaint may be directed to these Delegate Committees, it fails to meet the clear requirements of Section 111.4(d), is fatally defective, should not be considered by the Commission to be directed to these Delegate Committees or, in the alternative, should be dismissed insofar as the Commission determines that it may be directed to these Delegate Committees.

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Since the Complaint, on its face, is not directed against the Delegate Committees, no further response is made to the Complaint on behalf of the Delegate Committees at this time. However, the Delegate Committees reserve their right to respond to the substantive claims of the Complaint at such time as such response may be required.

Respectfully submitted,

THIRD CONGRESSIONAL DISTRICT (ILLINOIS) DELEGATES FOR MONDALE

FOURTH DISTRICT (ILLINOIS) MONDALE DELEGATE COMMITTEE

COMMITTEE CONGRESSIONAL DISTRICT (ILLINOIS) DELEGATES FOR MONDALE

NINTH DISTRICT (ILLINOIS) MONDALE DELEGATE COMMITTEE

ELEVENTH DISTRICT (ILLINOIS) MONDALE DELEGATE COMMITTEE

FOURTEENTH DISTRICT (ILLINOIS) DELEGATE COMMITTEE FOR MONDALE

SEVENTEENTH DISTRICT (ILLINOIS) MONDALE DELEGATE COMMITTEE

TWENTIETH CONGRESSIONAL DISTRICT (ILLINOIS) DELEGATES FOR MONDALE

TWENTY-FIRST CONGRESSIONAL DISTRICT (ILLINOIS) MONDALE DELEGATES COMMITTEE

BY Michael D. Sher

Michael D. Sher, Counsel for the Delegate Committees

Friedman & Koven
208 South LaSalle Street
Chicago, IL 60604
(312) 346-8500

MDS:ji

3504015045

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(312) 348-6800
CABLE ADDRESS "FREEZOR"
TELEX 254083

MICHAEL D. SHER
DIRECT TELEPHONE NUMBER
(312) 269-6005

July 11, 1984

Stephen Mims, Esq.
Federal Election Commission
1325 K Street, N. W.
Washington, DC 20463

Re: MUR 1667 / MUR 1704

Dear Mr. Mims:

As you requested during our telephone conversation of June 29, this will advise you that the 4th District Delegate Committee has not received nor expended any funds since July 5, 1984, the last day of the reporting period covered by the Termination Report filed by that Committee with the Commission in July, 1984. This will further advise you that as of July 1, 1984, the 4th District Delegate Committee had no funds in its accounts.

This information is being voluntarily provided to the Commission by the Committee and is provided without prejudice to any and all rights which that Committee has or may have. This will also reaffirm the position previously expressed in my letters to the Commission dated June 8 and June 27, 1984. To date, I have not received a response to either of those letters.

Very truly yours,

Michael D. Sher

Michael D. Sher

MDS:ji

cc: Terrie L. Hanus

3504015545

FRIEDMAN & KOVEN
407 SOUTH LA SALLE STREET
CHICAGO, ILLINOIS 60604

JUL 15 AM 11:25

Stephen Mims, Esq.
Federal Election Commission
1325 K Street, N. W.
Washington, DC 20463

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(312) 346-6500
CABLE ADDRESS "FREEZOR"
TELEX 254083

MICHAEL D. SHER
DIRECT TELEPHONE NUMBER
(312) 360-6609

June 8, 1984

Mr. John D. Gibson
Assistant Staff Director
Reports Analysis Division
Federal Election Commission
1325 K Street, N. W.
Washington, DC 20463

Re: MUR 1667

Dear Mr. Gibson:

I have been designated as counsel for Mondale Delegate Committees from the Third, Fourth, Seventh, Ninth, Eleventh, Twelfth, Fourteenth, Seventeenth, Nineteenth, Twentieth, Twenty-First and Twenty-Second Districts from the State of Illinois (the "Delegate Committees") in the above-referenced proceeding before the Federal Election Commission (the "Commission"). The treasurers of certain of the Delegate Committees have received letters from you, all dated May 16, 1984, which advise the Delegate Committees that in view of the above-referenced proceeding before the Commission, "the Federal Election Commission cannot approve any requests for termination from your committee, at this time." Your letter further reminds the committees "that until termination is authorized, your reporting requirements under 2 U.S.C. § 434 continue."

On behalf of the Delegate Committees, I respectfully suggest that neither Section 434, Section 433(d) nor 11 C.F.R. § 102.3 supports your contention that continued reporting is required by the Delegate Committees until such time as the Commission approves requests for termination. I am unaware of any authority which supports the Commission's apparent position that its authorization is necessary for the termination of a political committee, where that committee "no longer receive[s] any contributions or make[s] any disbursements that would otherwise qualify it as a political committee" and where that committee "has no outstanding debts and obligations." 11 C.F.R. § 102.3(a). Therefore, there appears to be no legal basis for your assertion that the Delegate Committees, which no longer conduct any activities, are required to report to the Commission pursuant to Section 434 until such time as their termination is "approved" by the Commission.

Accordingly, until such time as the Commission explains by what authority it can continue to compel inactive political committees to file reports pursuant to Section 434, the Delegate Committees presently intend to file the appropriate termination reports on the appropriate FEC Forms in accordance with 11 C.F.R. § 102.3, or have already done

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so in certain instances. Based upon the express provisions of Sections 433(d) and 434 of Title 2, and 11 C.F.R. § 102.3 promulgated pursuant thereto, the Delegate Committees respectfully submit that they are not required, nor do they presently intend, to file any additional quarterly reports with the Commission, as such is not required by any of the aforesaid provisions. Please advise me of the Commission's position regarding this matter and whether it has or will reconsider the position expressed in your letter of May 16. Thank you.

Very truly yours,

Michael D. Sher

Michael D. Sher

MDS:ji

cc: Charles N. Steele, Esq.

8504005015549

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1704

NAME OF COUNSEL: MICHAEL D SHER

ADDRESS: FRIEDMAN & KOVEN LAW OFFICE
208 SOUTH LA SALLE STREET
CHICAGO, IL. 60604

TELEPHONE: (312) 269-9605

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.

June 5, 1984
Date

Terrie L. Haines, Treasurer
Signature

RESPONDENT'S NAME: TERRIE L. HAINES TREASURER 4TH DISTRICT MONDALE DELEGATE COMMITTEE

ADDRESS: 1210 TIMBER PL.
NEW LENOX, ILL.
60451

HOME PHONE: (815) 485-4017

BUSINESS PHONE:

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JUN - 7 1984
MICHAEL D. SHER

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(312) 348-6500
CABLE ADDRESS "FREEZOR"
TELEX 254083

MICHAEL D. SHER
DIRECT TELEPHONE NUMBER
(312) 348-6505

MUR 1667
Memo

May 25, 1984

Charles N. Steele, Esq.
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, DC 20463

Re: MUR 1667 / Fourth District (Illinois)
Mondale Delegate Committee

Dear Mr. Steele:

On May 15, 1984, following a telephone conversation with Mr. Stephen Mims of your office, I sent the Commission a written request for an extension of time in which to respond to the complaint in the above-referenced matter. I sent this written request by Federal Express and, I presume, it was received by the Commission on May 16.

Receiving no response to my request, on May 22, the original due date, I filed with the Commission the response of the Fourth District Committee. On May 23, I received your letter dated May 21, advising me that my request for an extension of time had been denied.

I would appreciate the courtesy of a more timely response to any request or inquiry which you may receive from me in the future. Thank you.

Very truly yours,

Michael D. Sher

Michael D. Sher

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MICHAEL D. SHER
DIRECT TELEPHONE NUMBER
(312) 960-9609

May 25, 1984

Charles N. Steele, Esq.
General Counsel
Federal Election Commission
1325 K Street, N. W.
Washington, DC 20463

Re: MUR 1667 / Consolidated Response of Mondale Delegate Committees from the Third, Seventh, Ninth, Fourteenth, Seventeenth, Twentieth and Twenty-Second Districts (Illinois)

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Dear Mr. Steele:

This letter is submitted to the Federal Election Commission (the "Commission") on behalf of the Mondale Delegate Committees from the State of Illinois for the above-referenced districts (the "Respondent Committees" or the "Committees") in response to the Complaint and supplemental submissions filed with the Commission by Americans with Hart, Inc. ("Complainant").[1] Complainant asserts that the Respondent

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1 With the exception of the Twenty-Second District Committee, the Respondent Committees have received a copy of Complainant's Complaint, dated April 6, 1984, an amendment thereto dated April 18, 1984, a second amendment thereto dated April 27, 1984 and a third amendment dated May 2, 1984. This response is made to the Complaint and all supplemental submissions. The Complaint and supplemental submissions are hereinafter collectively referred to as the "Complaint" except where otherwise noted. The Twenty-Second District Committee received only the Complaint and the first two amendments.

Committees and other delegate committees are part of a nationwide network of delegate committees which support the nomination of Walter F. Mondale as the Democratic Party candidate for President and which are orchestrated by Mr. Mondale's national campaign committee, Mondale for President, Inc. ("MFP"). The generalized allegations of the Complaint are predicated almost exclusively on reports of delegate committee activities which have appeared in the printed media. While Complainant may find the reported conduct politically objectionable, even assuming the accuracy of such reports for purposes of considering the matter now pending before the Commission, such conduct is not proscribed by the applicable election laws.

The Complaint fails to recite sufficient facts, as contrasted with its conclusory allegations, to support its suggestion that all or some of the Respondent Committees have failed to conduct their affairs in accordance with the Federal Election Campaign Act of 1971 as amended, 2 U.S.C. § 431, et seq. (the "Act"), and the regulations promulgated thereunder, and that the Committees are "affiliated committees." Accordingly, the Commission should conclude that there is no reason to believe that the Respondent Committees have participated in any violation of the Act or the regulations promulgated thereunder.

I.

The Respondent Committees Are Not "Affiliated Committees" Under Section 100.5(g)

The Respondent Committees are not and were not "affiliated committees" as defined in Section 100.5(g). 11 C.F.R. § 100.5(g). The Respondent Committees were established by local residents within their respective Congressional Districts who sought

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to support the candidacies of those who were running as Mondale delegates in their districts. There are no factual assertions in the Complaint which support a contrary conclusion. The Complaint does not allege or suggest that members of one delegate committee participated in the establishment of another committee. See 11 C.F.R. § 106.5(g)(2)(E). Nor does the Complaint recite any factual assertions which support its suggestion that individuals other than the members of the respective Committees had authority to control the decisions and operations of each of the Committees. See 11 C.F.R. § 110.5(g)(2)(ii)(C).[2]

Based upon the factors articulated in Section 110.5(g)(2), the Complaint provides no basis for concluding that the Respondent Committees were ever anything other than the instruments chosen by the members of each Committee to enhance the delegate candidates' prospects for election as delegates to the Democratic National Convention, a purpose clearly contemplated by and to be fostered by the Act and the regulations promulgated thereunder. Contrary to the conclusory allegations of the Complaint, there is no reason to believe that the Respondent Committees are or were affiliated committees.

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2 In support of its claim that Mondale delegate committees "are acting in concert," Complainant's April 27 amendment states that the Twenty-Second District Committee made a $1,000 contribution to the Kansas Mondale At-Large Committee subsequent to the Illinois primary. (April 27, 1984 amendment, at p. 6.) However, a single contribution by the Twenty-Second District Committee to one other delegate committee hardly constitutes a "pattern of contributions" or a transfer of a "substantial portion" of funds which might indicate "affiliation." See 11 C.F.R. § 100.5(g)(2)(ii)(D) and (E).

II.

Expenditures Made By The Respondent Committees Were Proper and Made In Accordance With Section 110.14.

The Complaint asserts that when delegate committees "make expenditures to promote Mr. Mondale's selection as the Democratic Candidate for President, they make in-kind contributions to the Mondale candidacy, 11 C.F.R. § 109.1(c), and are subject to the $1,000.00 contribution limitation." (Complaint at p. 13.) This contention is predicated exclusively on the distinction which Complainant makes between "a delegate" and a "delegate committee." Ignoring the express language of the Act and the regulations promulgated thereunder, Complainant contends that because there are registration and recording requirements and contribution limitations which pertain to delegate committees, there must necessarily also be similar restrictions with respect to expenditures by delegate committees. However, Complainant's reading of Section 110.14(e) is not supported by the express terms of that section or by any other sections of Title 11 of the Code of Federal Regulations or of the Act.

The Complaint contends that Section 110.14(d), entitled "Expenditures by Delegates," applies only to expenditures by individual delegates since that section employs the term "a delegate." However, when read in context and when viewed within the totality of Title 11, it becomes apparent that Section 110.14(d) applies to all expenditures by all delegates whether made by an individual delegate or by a group of delegates who have exercised their right to organize themselves as a delegate committee.

The Complaint argues that only when a delegate makes an "independent

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expenditure" is a delegate's expenditure not treated as an in-kind contribution. 11 C.F.R. § 100.1(a). Section 109.1(a) provides:

> (a) "Independent expenditure" means 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 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.

11 C.F.R. § 109.1(a) (2 U.S.C. § 431(17) (emphasis added).

Relying on Section 109.1(c), the Complaint further charges that when a delegate committee makes an expenditure to promote Mr. Mondale's candidacy, that expenditure is always an in-kind contribution to that candidacy. (Complaint at p. 13.) However, this argument conveniently ignores the definition of "person" found just prior to Section 109.1(c) in Section 109.1(b)(1). "Person" is defined there as

> an individual, partnership, committee, association or any organization or group of persons, including a separate segregated fund established by a labor organization, corporation, or national bank (see Part 114) but does not mean a labor organization, corporation, or national bank.

11 C.F.R. § 109.1(b)(1) (emphasis added); see also 11 C.F.R. § 100.10 (2 U.S.C. § 431(11)).

Section 109.1(a)'s definition of "independent expenditure," which obviously incorporates the definition of "person" which immediately follows it in Section 109.1(b)(1), clearly demonstrates that an independent expenditure may be made by a delegate or by a delegate committee, that there is a single standard to be applied to determine whether or not a particular expenditure is "independent," and that application of this standard is not dependent upon the nature or composition of the "person" making the expenditure; the test is whether the expenditure is made "with the cooperation or with the prior consent of, or in consultation with, or at the request or suggestion of, a

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candidate or any agent or authorized committee of such candidate." The test of "independence" is not dependent upon the nature of the "person" making the expenditure, but rather upon the relationships among that person, the expenditure in question and "a candidate or any agent or authorized committee of such candidate."[3] Section 109.1(b)(1) makes no distinction between a delegate and a delegate committee in connection with independent expenditures and neither should the Commission.

The identical treatment of expenditures by a delegate or by a delegate committee is further supported by an examination of the structure of Section 110.14, which is entitled "Expenditures by Delegates." Based upon Section 110.14(d)'s use of the term "a delegate," Complainant contends that the regulations regarding expenditures contained in that section pertain only to individual delegates, not to delegate committees. However, adoption of Complainant's proposed construction would require the Commission to selectively edit and ignore the express language of Section 110.14(d).

Section 110.14(d)(2)(ii) addresses expenditures by "a delegate from contributions to him or her or from personal funds for costs incurred in the use of" public media, "direct mail or similar types of general public communication or political advertising which advocate the delegate's election as well as information regarding a candidate for the office of President...." That section provides that such expenditures are generally exempt from the spending limitations contained in the referenced sections of the Act and

3 Moreover, the test of "independence," and its distinction between "independent expenditure" and "in-kind contribution," is not germane to delegate committee expenditures for "certain campaign materials"; the test of independence applies only to expenditures for general public advertising in the public media. Compare 11 C.F.R. § 110.14(d)(2)(i) with 11 C.F.R. § 110.14(d)(2)(ii).

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Title 11, except as provided under the immediately following subsections of Section 110.14(d). Moreover, Section 110.14(d)(2)(ii) further provides that such expenditures by a delegate are not required to be reported by a delegate except as expressly provided in that subsection. However, that subsection further provides, with respect to expenditures by delegate committees, as follows:

> (See 11 CFR 110.14(e) for reporting requirements relating to delegate committees.)

11 C.F.R. § 110.14(d)(2)(ii). This directive is also found at the beginning of Section 110.14(d) in connection with that section's provision that expenditures by a delegate are, as a general rule, not "reportable under 11 CFR Part 104 and 2 U.S.C. 434." 11 C.F.R. § 110.14(d)(1).

Why would Section 110.14(d) address the issue of the reporting by delegate committees of "Expenditures by Delegates" if that section did not apply with equal force to both delegates and delegate committees? Obviously, the answer is that the section's directive relating to the reporting of expenditures by delegate committees is included in that section because Section 110.14(d) applies to all delegates, even when delegates choose to organize themselves into delegate committees. The directive relating to reporting by delegate committees merely refers delegate committees to the sections of Title 11 and the Act which impose a general reporting requirement on delegate committees. The additional reporting requirements imposed by Subsection 110.14(d)(2)(ii) can be explained by the fact that a delegate, as distinguished from a delegate committee, does not have any general obligation to report unless an individual delegate engages in public advertising. Since delegate committees are already required to report under Section 110.14(e) and the provisions referred to therein, irrespective of the nature

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of the expenditure, Section 110.14(d)(2)(ii) merely directs those delegate committees which engage in public advertising to the reporting requirements found in Section 110.14(e) which has general application for delegate committees.

Rather than constituting the exclusive provision within Section 110.14 relating to delegate committees, as Complainant contends, Section 110.14(e) is a provision which applies to delegate committees in addition to the other provisions of Section 110.14; Section 110.14(e) imposes additional registration and reporting requirements on delegate committees in addition to, rather than in lieu of, the prescriptions found in the other parts of Section 110.14.

Complainant states that the "exception" for campaign materials used for "volunteer activities" set forth in Section 110.14(d)(2)(i)(A) "is not available to delegate committees." (April 27, 1984 amendment, at p. 7) (emphasis in original). As authority for this proposition, Complainant relies exclusively upon Section 110.14(e). (Id.) However, Section 110.14(e) does not address expenditures. Rather, that section imposes additional responsibilities on delegate committees, not imposed on individual delegates, in connection with registration with the Commission, filing reports of contributions received and expenditures made, imposing certain limitations on contributions made to a delegate committee, and imposing certain limitations on contributions which may be made by a delegate committee. Nothing in that section addresses or restricts the general provisions relating to delegate expenditures set forth in Section 110.14(d).[4]

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4 In the case of the Twenty-Second District Committee, the April 27 amendment states that two of the Committee's employees gave their addresses as "c/o Mondale for President" in Washington, D.C., and charges that this somehow further supports Complainant's claim that § 110.14(d) applies to expenditures by (Cont'd.)

Complainant's confusion results from its failure to distinguish among the various categories of requirements and limitations imposed upon delegates and delegate committees, i.e., registration requirements, reporting requirements, limitations imposed which regulate and restrict the nature and amount of contributions which may be received and made, and expenditure categories and limitations which regulate how funds may be expended and whether such expenditures are to be treated as "independent" expenditures or "in-kind" contributions.

CONCLUSION

For the reasons stated herein, the Respondent Committees respectfully urge the Commission to: (1) conclude that there is no reason to believe that the Respondent Committees, or any of them, have engaged in any activity in violation of the Act or the regulations promulgated thereunder and to so find; and (2) enter an order dismissing the Complaint against the Respondent Committees.

Respectfully submitted,

THIRD CONGRESSIONAL DISTRICT
(ILLINOIS) DELEGATES FOR MONDALE

SEVENTH CONGRESSIONAL DISTRICT
(ILLINOIS) DELEGATES FOR MONDALE

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individual delegates only, not to those made by delegate committees. (April 27, 1984 amendment, at p. 8.) Complainant further charges that those addresses support its conclusion that delegate committees are not entitled to make per diem subsistence or reimbursement payments to such volunteers. (Id.) However, Complainant's April 27 amendment fails to allude to any supporting authority in the Act or regulations for its contentions, for no such authority exists. Section 110.14(d) applies to a delegate and delegate committees alike.

NINTH DISTRICT (ILLINOIS) MONDALE
DELEGATE COMMITTEE

FOURTEENTH DISTRICT (ILLINOIS)
DELEGATE COMMITTEE FOR MONDALE

SEVENTEENTH DISTRICT (ILLINOIS)
MONDALE DELEGATE COMMITTEE

TWENTIETH CONGRESSIONAL DISTRICT
(ILLINOIS) DELEGATES FOR MONDALE

TWENTY-SECOND CONGRESSIONAL
DISTRICT (ILLINOIS) DELEGATES
FOR MONDALE

By: Michael D. Sher
Michael D. Sher, Counsel for
Respondent Committees

Friedman & Koven
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May 21, 1984

Charles N. Steele, Esq.
General Counsel
Federal Election Commission
1325 K Street, N. W.
Washington, DC 20463

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Re: MUR 1667 / Response of Fourth District (Illinois)
Mondale Delegate Committee

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Dear Mr. Steele:

This letter and the affidavit and exhibits attached hereto are submitted to the Federal Election Commission (the "Commission") on behalf of the Fourth District Mondale Delegate Committee from the State of Illinois (the "Fourth District Committee" or the "Committee") in response to the Complaint and supplemental submissions filed with the Commission by Americans with Hart, Inc. ("Complainant").[1] Complainant asserts that the Fourth District Committee and other delegate committees are part of a nationwide network of delegate committees which support the nomination of Walter F.

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1 On May 7, 1984, the Fourth District Committee received a copy of Complainant's Complaint, dated April 6, 1984, an amendment thereto dated April 18, 1984, and a second amendment thereto dated April 27, 1984. This response is made to the Complaint and both supplemental submissions. The Complaint and supplemental submissions are hereinafter collectively referred to as the "Complaint" except where otherwise noted.

Mondale as the Democratic Party candidate for President and which are orchestrated by Mr. Mondale's national campaign committee, Mondale for President, Inc. ("MFP"). However, the generalized allegations of the Complaint are predicated almost exclusively on reports which have appeared in the printed media and ignore the actual activities and affairs of delegate committees such as the Fourth District Committee.

The Fourth District Committee has conducted its affairs in an independent manner consistent with the Federal Election Campaign Act of 1971 as amended, 2 U.S.C. § 431, et seq. (the "Act") and the regulations promulgated thereunder and is not an "affiliated committee." The expenditures which have been made by it have all been proper, including the expenditures which it made when its members decided to place political advertisements in local newspapers to further the cause of their election. Accordingly, the Commission should conclude that there is no reason to believe that the Fourth District Committee has participated in any violation of the Act or the regulations promulgated thereunder.

I.

The Fourth District Committee Was Independently Formed, Conducted Its Affairs Independently and Is Not An "Affiliated Committee."

The Fourth District Committee was conceived and operated by its members and, as is clearly demonstrated below, did not receive or accept instructions or directions from MFP or any other delegate committee. The members of the Fourth District Committee are George Sangmeister, E. Karen Vogel, Marjorie Friedman, Charles E. Hanus, Jr. and Dan Vera; Mr.Vera is a member of the committee as an alternate delegate. In early February, 1984, the aforesaid individuals, who were then running as delegates to the

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Democratic National Convention and who supported the candidacy of Mr. Mondale, decided that they could more effectively campaign as delegates if they formed a delegate committee. At that time, they had received memoranda from MFP relating to the formation and conduct of delegate committees.[2]

Thereafter, as the reports filed with the Commission reflect, the members of the Fourth District Committee loaned their committee $600.00 for its initial funding in order to commence its activities. As those reports filed with the Commission further reflect, the Fourth District Committee received no funds from MFP or from any other delegate committee, nor did the Fourth District Committee transfer or contribute any funds to MFP or to any other delegate committee.

During its existence, the Fourth District Committee had only one officer, its treasurer, Terrie Hanus. Mrs. Hanus was not at any time a member or officer of any other delegate committee. None of the members of the Fourth District Committee was at any time a member or officer of any other delegate committee or of MFP.

The Fourth District Committee never maintained an office, but, rather, used for its mailing address the residence of Terrie Hanus and Charles E. Hanus, Jr., its treasurer and one of its delegate members, respectively. The Committee employed no staff and, accordingly, had no payroll.

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2 These materials included the letter of Bob Beckel, campaign manager of MFP, dated January 12, 1984, and the January 6, 1984 memorandum attached thereto, and the memorandum of Elaine Kamarck, dated January 12, 1984. Copies of the aforesaid letter and memoranda are attached to the Affidavit of Charles E. Hanus, Jr., attached hereto as Exhibit A and made a part hereof.

Clearly, the Fourth District Committee was never an "affiliated committee" as defined in Section 100.5(g). 11 C.F.R. § 100.5(g). The Fourth District Committee was established by the individuals running as Mondale delegates within that Congressional District; no one else participated in its establishment nor did any of the members of the Fourth District Committee participate in the formation or establishment of any other delegate committees. See 11 C.F.R. § 100.5(g)(2)(E). Moreover, the only individuals who controlled or who had the authority to control the decisions and operations of the committee were its members and its treasurer. See 11 C.F.R. § 110.5(g)(2)(ii)(C). Based upon the factors articulated in Section 110.5(g)(2), there is simply no basis for concluding that the Fourth District Committee was ever anything other than the instrument chosen by its members to enhance their prospects for election as delegates to the Democratic National Convention, a purpose clearly contemplated by and to be fostered by the Act and the regulations promulgated thereunder. Contrary to the conclusory allegations of the Complaint, there is no reason to believe that the Fourth District Committee is or was an affiliated committee. Rather, the Commission should conclude that the Fourth District Committee was established, operated and controlled by its members to further their collective interest in being elected as delegates.

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II.

Expenditures Made By The Fourth District Committee Were Proper and Made In Accordance With Section 110.14.

The Complaint asserts that when delegate committees "make expenditures to promote Mr. Mondale's selection as the Democratic Candidate for President, they make

in-kind contributions to the Mondale candidacy, 11 C.F.R. § 109.1(c), and are subject to the $1,000.00 contribution limitation." (Complaint at p. 13.) This contention is predicated exclusively on the distinction which Complainant makes between "a delegate" and a "delegate committee." Ignoring the express language of the Act and the regulations promulgated thereunder, Complainant contends that because there are registration and recording requirements and contribution limitations which pertain to delegate committees, there must necessarily also be similar restrictions with respect to expenditures by delegate committees. However, Complainant's reading of Section 110.14(c) is not supported by the express terms of that section or by any other sections of Title 11 of the Code of Federal Regulations or of the Act.

The Complaint contends that Section 110.14(d), entitled "Expenditures by Delegates," applies only to expenditures by individual delegates since that section employs the term "a delegate." However, when read in context and when viewed within the totality of Title 11, it becomes apparent that Section 110.14(d) applies to all expenditures by all delegates whether made by an individual delegate or by a group of delegates who have exercised their right to organize themselves as a delegate committee.

The Complaint argues that only when a delegate makes an "independent expenditure" is a delegate's expenditure not treated as an in-kind contribution. 11 C.F.R. § 109.1(a). Section 109.1(a) provides:

> (a) "Independent expenditure" means 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 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.

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11 C.F.R. § 109.1(a) (2 U.S.C. § 431(17) (emphasis added).

Relying on Section 109.1(c), the Complaint further charges that when a delegate committee makes an expenditure to promote Mr. Mondale's candidacy, that expenditure is always an in-kind contribution to that candidacy. (Complaint at p. 13.) However, this argument conveniently ignores the definition of "person" found just prior to Section 109.1(c) in Section 109.1(b)(1). "Person" is defined there as

> an individual, partnership, committee, association or any organization or group of persons, including a separate segregated fund established by a labor organization, corporation, or national bank (see Part 114) but does not mean a labor organization, corporation, or national bank.

11 C.F.R. § 109.1(b)(1) (emphasis added); see also 11 C.F.R. § 100.10 (2 U.S.C. § 431(11)).

Section 109.1(a)'s definition of "independent expenditure," which obviously incorporates the definition of "person" which immediately follows it in Section 109.1(b)(1), clearly demonstrates that an independent expenditure may be made by a delegate or by a delegate committee, that there is a single standard to be applied to determine whether or not a particular expenditure is "independent," and that application of this standard is not dependent upon the nature or composition of the "person" making the expenditure; the test is whether the expenditure is 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." The test of "independence" is not dependent upon the nature of the "person" making the expenditure, but rather upon the relationships among that person, the expenditure in question and "a candidate or any agent or authorized committee of such candidate." Section 109.1(b)(1) makes no distinction between a delegate and a delegate committee in connection with

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independent expenditures and neither should the Commission.

The identical treatment of expenditures by a delegate or by a delegate committee is further supported by an examination of the structure of Section 110.14, which is entitled "Expenditures by Delegates." Based upon Section 110.14(d)'s use of the term "a delegate," Complainant contends that the regulations regarding expenditures contained in that section pertain only to individual delegates, not to delegate committees. However, adoption of Complainant's proposed construction would require the Commission to selectively edit and ignore the express language of Section 110.14(d).

Section 110.14(d)(2)(ii) addresses expenditures by "a delegate from contributions to him or her or from personal funds for costs incurred in the use of" public media, "direct mail or similar types of general public communication or political advertising which advocate the delegate's election as well as information regarding a candidate for the office of President...." That section provides that such expenditures are generally exempt from the spending limitations contained in the referenced sections of the Act and Title 11, except as provided under the immediately following subsections of Section 110.14(d). Moreover, Section 110.14(d)(2)(ii) further provides that such expenditures by a delegate are not required to be reported by a delegate except as expressly provided in that subsection. However, that subsection further provides, with respect to expenditures by delegate committees, as follows:

> (See 11 CFR 110.14(e) for reporting requirements relating to delegate committees.)

11 C.F.R. § 110.14(d)(2)(ii). This directive is also found at the beginning of Section 110.14(d) in connection with that section's provision that expenditures by a delegate are, as a general rule, not "reportable under 11 CFR Part 104 and 2 U.S.C. 434." 11 C.F.R.

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as a general rule, not "reportable under 11 CFR Part 104 and 2 U.S.C. 434." 11 C.F.R. § 110.14(d)(1).

Why would Section 110.14(d) address the issue of the reporting by delegate committees of "Expenditures by Delegates" if that section did not apply with equal force to both delegates and delegate committees? Obviously, the answer is that the section's directive relating to the reporting of expenditures by delegate committees is included in that section because Section 110.14(d) applies to all delegates, even when delegates choose to organize themselves into delegate committees. The directive relating to reporting by delegate committees merely refers delegate committees to the sections of Title 11 and the Act which impose a general reporting requirement on delegate committees. The additional reporting requirements imposed by Subsection 110.14(d)(2)(ii) can be explained by the fact that a delegate, as distinguished from a delegate committee, does not have any general obligation to report unless an individual delegate engages in public advertising. Since delegate committees are already required to report under Section 110.14(e) and the provisions referred to therein, irrespective of the nature of the expenditure, Section 110.14(d)(2)(ii) merely directs those delegate committees which engage in public advertising to the reporting requirements found in Section 110.14(e) which has general application for delegate committees.

Rather than constituting the exclusive provision within Section 110.14 relating to delegate committees, as Complainant contends, Section 110.14(e) is a provision which applies to delegate committees in addition to the other provisions of Section 110.14; Section 110.14(e) imposes additional registration and reporting requirements on delegate

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committees in addition to, rather than in lieu of, the prescriptions found in the other parts of Section 110.14.

Complainant states that the "exception" for campaign materials used for "volunteer activities" set forth in Section 110.14(d)(2)(i)(A) "is not available to delegate committees." (April 27, 1984 amendment, at p. 7) (emphasis in original). As authority for this proposition, Complainant relies exclusively upon Section 110.14(e). (Id.) However, Section 110.14(e) does not address expenditures. Rather, that section imposes additional responsibilities on delegate committees, not imposed on individual delegates, in connection with registration with the Commission, filing reports of contributions received and expenditures made, imposing certain limitations on contributions made to a delegate committee, and imposing certain limitations on contributions which may be made by a delegate committee. Nothing in that section addresses or restricts the general provisions relating to delegate expenditures set forth in Section 110.14(d). Complainant's confusion results from its failure to distinguish among the various categories of requirements and limitations imposed upon delegates and delegate committees, i.e., registration requirements, reporting requirements, limitations imposed which regulate and restrict the nature and amount of contributions which may be received and made, and expenditure categories and limitations which regulate how funds may be expended and whether such expenditures are to be treated as "independent" expenditures or "in-kind" contributions.

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III.

The "Media" Expenditures Made By The Fourth District Committee Were Independent And Proper Pursuant To Section 110.14(d)(2)(ii).

Complainant concedes that an expenditure is independent if it is made 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 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.

11 C.F.R. § 109.1(a) (2 U.S.C. § 431(17)) (emphasis added).[3] This definition is incorporated in substance in Section 110.14(d)(2)(ii)(A)(1), which treats an expenditure for media as an in-kind contribution only where the expenditure is made in cooperation or in concert with a presidential candidate, i.e., where it is not independent. There is no suggestion in the Complaint that the expenditures for "media" referred to in the April 27 amendment[4] were in any way "made with the cooperation or with the prior consent of, or in consultation with, or at the request or suggestion of" Mr. Mondale or MFP. On the contrary, as recited in the Affidavit of Charles E. Hanus, Jr., attached hereto as Exhibit A and made a part hereof (the "Hanus Affidavit"), the expenditures for media made by the Fourth District Committee resulted from the exercise of the independent judgment of the members of that committee.

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3 Again, when reading this section one must be mindful of the definition of "person" found in the Act and regulations. 2 U.S.C. § 431(11); 11 C.F.R. §§ 100.11 and 109.1(b)(1).

4 April 27 amendment at p. 8, footnote.

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While Complainant appears to complain of expenditures for media by the Fourth District Committee, Complainant fails to explain how any expenditures for media would violate the Act or its regulations. Complainant concedes that delegate expenditures for media are appropriate when made by individual delegates, provided such expenditures meet the "independent expenditures" test. (Complaint, April 6, 1984, at p. 17, footnote). Presumably, Complainant would further contend that such expenditures are never permitted when made by or on behalf of a delegate committee based on Complainant's contention that Section 110.14(d) applies exclusively to expenditures by individual delegates, not to those made by delegate committees. For the reasons discussed in Part II of this letter, this proposed construction should be rejected by the Commission.

Section 110.14(d)(2)(ii)(B) provides that expenditures for media "are not subject to limitations, but are reportable if they are independent expenditures," and incorporates Section 109.1(a)'s definition of "independent expenditure." The expenditures made by the Fourth District Committee to run political advertisements in local newspapers were not only independent expenditures, but also further evince the Fourth District Committee's independence and that it was not in any manner affiliated with or controlled by MFP or any other delegate committee.

In January, 1984, the Fourth District Committee received copies of the January 6, 1984 memorandum of David Ifshin and Lyn Oliphant and the January 12, 1984 memorandum of Elaine Kamarck of MFP to "Mondale Delegates," copies of which are attached to the Hanus Affidavit. In the January 6 memorandum of Ifshin and Oliphant, delegates were advised regarding their right to form delegate committees and the

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requirements attendant to the formation and operation of such committees. At page 6 of that memorandum, delegates were advised regarding items for which, in the opinion of Mr. Ifshin and Ms. Oliphant, delegate committees may not make expenditures. That memorandum specifically suggested to delegates that "Delegate Committees May Not Make Expenditures for ... Billboards, radio and television advertising or any other communications aimed at the general public." (Emphasis in original.) Moreover, the Kamarck memorandum of January 12 specifically advised delegates:

> Under no circumstances can money be spent [by delegate committees] for general public advertising such as T.V., radio, newspaper ads, billboards or direct mail.

(Emphasis added.) Despite these clear suggestions and admonitions from MFP, the Fourth District Committee concluded that it could and would place political advertisements in several local newspapers urging the local electorate to support the candidacy of Mr. Mondale and to elect them as delegates to the Democratic National Convention. Irrespective of the Commission's view of the propriety of expenditures for media by delegate committees, the Fourth District Committee's decision to run political advertisements in local newspapers, in the face of the admonitions clearly stated in the January 6 and January 12 memoranda received from MFP, amply demonstrates the extraordinary independence of the Fourth District Committee and the lack of authority, power, influence or control of MFP over that committee.

The newspaper advertisements which were placed by the Fourth District Committee were conceived, composed and placed by the members of that committee without being directed to do so by MFP or any other delegate committee or individual. Mr. Hanus, one of the delegate members of the Committee, composed and placed an ad

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in the Joliet Herald News. That ad ran in the Herald News for one day at a cost of $398.82. A copy of that ad is attached to the Hanus Affidavit. E. Karen Vogel, another delegate member of the Committee, selected and placed the ads which appeared in the Hammond Times and the Star Tribune. The cost of those ads were $76.50 and $195.20, respectively. Copies of those ads are also attached to the Hanus Affidavit. Each of the foregoing ads appeared on one occasion in March, 1984, shortly before the Illinois Primary on March 20, 1984.

For the reasons discussed above, the expenditures made by the Fourth District Committee in connection with these ads were proper independent expenditures and further demonstrate the independence of the Fourth District Committee.

CONCLUSION

For the reasons stated herein, the Fourth District Committee respectfully urges the Commission to: (1) conclude that there is no reason to believe that the Fourth District Committee has engaged in any activity in violation of the Act or the regulations promulgated thereunder and to so find; and (2) enter an order dismissing the Complaint against the Fourth District Committee.

Respectfully submitted,

FOURTH DISTRICT (ILLINOIS) MONDALE
DELEGATE COMMITTEE

By: Michael D. Sher

Michael D. Sher, Counsel for Respondent
Friedman & Koven
208 South LaSalle Street
Chicago, IL 60604
312/346-6500

3504015741

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of the Complaint of Americans With Hart, Inc.,	)	
Complainant,	)	
v.	)	MUR 1667
Mondale for President Committee, Inc.,	)	
Respondent.	)	

STATE OF ILLINOIS)
)SS
COUNTY OF COOK)

AFFIDAVIT OF CHARLES E. HANUS, JR.
IN SUPPORT OF THE RESPONSE OF THE
FOURTH DISTRICT (ILLINOIS) MONDALE DELEGATE COMMITTEE

Charles E. Hanus, Jr., being first duly sworn on his oath, deposes and states as follows:

1. I reside at 1210 Timber Place, New Lenox, Illinois, in the Fourth Congressional District of the State of Illinois.

2. I was elected in the Illinois Primary Election on March 20, 1984, as a delegate to the Democratic National Convention, and ran in that Primary as a delegate supporting the candidacy of Walter F. Mondale as the Democratic Party's nominee for President of the United States.

3. Also elected in that Primary Election as Democratic Party delegates from the Fourth Congressional District were George Sangmeister, E. Karen Vogel and Marjorie Friedman. Dan Vera was elected as an alternate Democratic Party delegate from our district in that Primary Election. (The aforementioned delegates, including affiant, and

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alternate delegate are hereinafter collectively referred to as the "Fourth District Delegates.")

4. In January, 1984, the Fourth District Delegates received a letter from Bob Beckel, campaign manager of Mondale for President, Inc. ("MFP"), dated January 12, 1984, which letter accompanied a memorandum dated January 6, 1984, from David Ifshin and Lyn Oliphant. Both the letter and memorandum related to the formation and conduct of delegate committees. True and correct copies of the letter and memorandum are attached hereto as Exhibits 1 and 2, respectively, and made a part hereof. At about that time, the Fourth District Delegates also received a copy of a memorandum dated January 12, 1984, from Elaine Kamarck regarding the formation and conduct of delegate committees. A true and correct copy of this memorandum is attached hereto as Exhibit 3 and made a part hereof.

5. In early February, 1984, subsequent to numerous conversations and meetings among the Fourth District Delegates, we decided to form the Fourth District Mondale Delegate Committee in order to promote our candidacies as delegates in the Fourth District. We reached this decision independently and not in concert with or at the direction of anyone other than the five members of our delegate committee.

6. In order to commence the operation of our delegate committee, the Fourth District Delegates loaned, in the aggregate, $600 to our committee in early and mid-February, 1984. The Fourth District Committee never received any funds from any other delegate committee or from MFP, and never transferred or contributed any funds to any other delegate committee or to MFP.

7. The only officer of the Fourth District Committee was Terrie L. Hanus, my wife, who served on no other delegate committee and has never been an officer or agent of MFP. None of the members of the Fourth District Committee have served as officers of any other delegate committee or of MFP.

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8. The Fourth District Committee never maintained an office and used my residence, at 1210 Timber Place, in New Lenox, Illinois, as its mailing address. That address is also the residence of my wife, Terrie L. Hanus, who, as previously mentioned, served as treasurer of the Fourth District Committee.

9. At no time have the Fourth District Delegates employed any staff or employees, either full time or part time, and, accordingly, it has never maintained a payroll.

10. In March, 1984, the Fourth District Delegates decided to place political advertisements in local newspapers to promote our candidacies as delegates in the Fourth District. On or about March 15, 1984, I placed an ad in the the Joliet Herald News. This ad ran for one day and the committee incurred an expense of $399.92 in connection with the running of that ad. I composed and placed the ad without any assistance from any other individuals. A true and correct copy of the aforesaid ad is attached hereto as Exhibit 4 and made a part hereof. I also placed a one line ad in the column entitled "News In Brief," a community news column, which appeared in the Joliet Herald News on March 16 and 17, 1984, for which the committee incurred a cost of $56.00. On or about March 14, 1984, E. Karen Vogel placed a political advertisement in the Star Tribune. This ad ran for one day at a cost of $195.20 to the committee. Ms. Vogel also placed an ad in the Hammond Times on or about March 13, 1984, at a cost of $76.50 to the committee. E. Karen Vogel selected and placed both of these ads with the advice and consent of other committee members only. True and correct copies of these ads are attached hereto as Exhibits 5 and 6, respectively, and made a part hereof.

11. I have read the Complaint filed in this cause by Americans with Hart, Inc., and the amendments thereto dated April 18 and April 27, 1984, as well as the letter of Michael D. Sher, counsel for the Fourth District Delegate Committee, in response thereto. To the best of my knowledge and belief, the factual statements made in the

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response of the Fourth District Committee to the Complaint and amendments are true and correct.

Charles E. Hanus, Jr.

Subscribed and sworn to before me
this 17th day of May, 1984.

Lillian J. Ingle
Notary Public

8504050157 8

Mondale for President
2301 Wisconsin Avenue, N.W.
Washington, D.C. 20007
Telephone: 202-625-1000

MONDALE

TO: DELEGATE EXPENDITURE COMMITTEE TREASURERS

FROM: BOB BECKEL, CAMPAIGN MANAGER

DATE: JANUARY 12, 1984

RE: DELEGATE EXPENDITURE COMMITTEES

Dear Mondale Delegate:

Congratulations on your selection as a Democratic National Convention delegate pledged to Walter F. Mondale. With that selection you have taken the first step in a process which will hopefully lead to a seat on the convention floor in San Francisco.

As you probably know, National Convention delegate candidates are allowed to raise and expend money to support their candidacies. The purpose of this letter is to familiarize you with the Mondale Campaign's policy with respect to contributions from Political Action Committees.

It is the policy of the Mondale Campaign not to accept money from organized Political Action Committees. This policy was announced prior to the start of the campaign. It is our sincere hope that Delegate Expenditure Committees will follow suit and decline to accept Political Action Committee contributions.

Good luck and best wishes in the weeks ahead.

Sincerely,

Bob Beckal
Campaign Manager

EXHIBIT 1

Paid for by Mondale for President, Inc.

3504050015579

Mondale for President
2301 Wisconsin Avenue, N.W.
Washington, D.C. 20007
Telephone: 202-625-1000

MONDALE

MEMORANDUM

January 6, 1984

RE: Delegate Expenditure Committees

FROM: David Ifshin
Lyn Oliphant

FORMING A DELEGATE COMMITTEE

Under federal election law, if a group of delegates plans to raise or spend in excess of $1000 on behalf of the delegate slate, it must form a delegate committee. This committee must file two types of forms containing routine information with the Federal Election Commission: a Statement of Organization (Form 1) and a Report of Receipts and Expenditures (Form 3X). Copies of these forms are attached. Additional forms may be obtained from the legal office at the national headquarters.

The first step for a delegate committee is to designate a treasurer and to open a separate committee bank account.

Within 10 days of the time when your delegate committee raises contributions totalling in excess of $1000 or spends more than $1000, the treasurer must file a Statement of Organization with the FEC (Form 1).

HOW TO FILL OUT A STATEMENT OF ORGANIZATION

A Statement of Organization is a simple form designed to provide the FEC with basic information about political committees. Complete instructions are on the back of the form. In order to prepare a Statement for a delegate committee, the following should be kept in mind.

Line 1: Your committee's name is inserted on line 1. Under the law, the name of your committee must include the word "delegate(s)," and may include the name of the presidential candidate which it supports. For example, "XYZ Delegate Committee" or "XYZ Delegates for Mondale."

Line 2: This line requests the date when your group became a

EXHIBIT 2

Paid for by Mondale for President, Inc.

political committee. The date may be anytime prior to 10 days after the committee receives or expends its first $1000.

Line 3: If your committee is registering for the first time, you need not fill in this blank.

Line 4: If your committee is registering for the first time, you should check "NO."

Line 5: Delegate committees should check "(c)" and fill in the name of Walter F. Mondale.

Line 6: Fill in "NONE."

Line 7: This line requests the name of the person who will keep the records and books of your committee. If this is the treasurer, you may simply fill in "Treasurer."

Line 8: This line requests the name and address of the treasurer and assistant treasurer, if any. Your committee must have a treasurer, but need not have an assistant treasurer. The treasurer and assistant treasurer may, but are not required to be, candidates for delegate.

Line 9: Your committee funds must be kept in a separate checking account which contains only committee funds. This line requests the name and address of the bank in which the committee has its account. If for any reason a second account is needed or the funds are to be kept anywhere other than a bank, please consult with your state coordinator. Under the law, each committee makes all its disbursements by check drawn on the committee's account, except for expenditures of less than $100 made from a petty cash fund. If a petty cash fund is established, records must be kept of all disbursements from it.

Once the Statement of Organization has been completed, the treasurer must sign and date it. It should then be sent to the Federal Election Commission, 1325 K Street, N.W., Washington, D.C. 20463. A copy must also be filed with the Secretary of State in your state. Any changes in the information reported on the Form must be reported to the FEC in writing within 10 days of the date of the change. Please send a copy of the Statement of Organization and all other filings of the committee with the FEC to the national headquarters, attention General Counsel's office.

REPORTING REQUIREMENTS FOR RECEIPTS AND DISBURSEMENTS (Form 3X)

The Report of Receipts and Disbursements is a means of providing public disclosure of the financial activity of political committees. Complete instructions for periodic reporting of your financial activity are contained on the attached Report of Receipts and Disbursements (Form 3X). When completed, these reports should be forwarded to the Federal Election Commission, 1325 K Street, N.W., Washington, D.C. 20463. (A copy of the portion of the report applicable to activity in connection with a candidate's election in a state must also be filed with the Secretary of State in that state.) Please send a copy of all reports to the national headquarters, attention General Counsel's Office.

I. Quarterly Reports

Under the law, delegate committees must file quarterly Reports of Receipts and Disbursements (Form 3X) no later than April 15, July 15, October 15, and January 31 of next year. Each report must itemize the funds the committee has raised and expended during the period since the filing of the previous report.

II. Pre-election Reports

In addition to the quarterly reports, a preelection report is filed no later than the 12th day before a primary election in connection with which your committee makes contributions or expenditures. Such reports must include all transactions from the closing date of the last quarterly report filed, through the 20th day before the election. The Commission publishes lists of filing dates which are forwarded to all registered committees. That information will also be available through the legal office at the national headquarters.

III. Contents of Reports - Receipts

The FEC forms divide receipts into eight categories for the purpose of reporting. These are:

- Contributions from Individuals/Persons
- Contributions from Political Committees
- Transfers from Affiliated Committees
- Loans Received
- Loan Repayments Received
- Offsets to Operating Expenditures
- Contribution Refunds Received from Candidates and Committees
- Other Receipts

Total receipts in these categories are reported on the Detailed Summary Page.

In addition, certain receipts are itemized on a separate

Schedule A, (e.g. contributions from individuals/persons in excess of $200 or aggregating in excess of $200 during a calendar year). The instructions for Form 3X indicate those receipts which must be itemized on Schedule A. A separate Schedule A must be used for each category of receipt.

IV. Contents of Reports - Disbursements

Similarly, the FEC forms divide disbursements into eight categories for the purpose of reporting. These are:

Operating Expenditures
Transfers to Affiliated Committees
Contributions to Federal Candidates and Political Committees
Independent Expenditures
Loan Repayments Made
Loans Made
Contribution Refunds Made
Other Disbursements

Total disbursements in these categories are reported on the Detailed Summary Page.

In addition, some disbursements must be itemized on a separate Schedule B. Three categories (operating expenditures, independent expenditures, and other disbursements) must be itemized on Schedule B only if they exceed $200 or when added to other disbursements made to the same person, aggregate over $200 during a calendar year. Disbursements under the other categories must be itemized on Schedule B regardless of amount. A separate Schedule B must be used for each category of disbursement.

V. Additional Schedules for Receipts and Expenditures

Certain kinds of receipts and expenditures must also be listed on specific schedules in addition to the general Schedules A and B. These are: loans owed by and to the committee (Schedule C); other debts and obligations (Schedule D); and independent expenditures (Schedule E).

RECORDKEEPING REQUIREMENTS

Federal election law requires your committee to keep records of all receipts and disbursements. The treasurer has the responsibility to exercise best efforts to obtain and maintain these records.

There is no specific recordkeeping or accounting system required by the law. However, it is recommended that a committee keep a separate account for each of the various categories of receipts and disbursements on the Detailed Summary Page. This will assist you in filling out the Detailed Summary Page as well as Schedules A-E, as necessary.

For contributions received in the form of a check, it is recommended that photocopies of the checks be made and kept by the committee's treasurer.

All disbursements must be made by check or similar draft from a committee depository, except petty cash expenditures of $100 or less. A written journal of disbursements from petty cash must be maintained.

The Committee treasurer must preserve all records for 3 years after the filing date of the report corresponding to the records.

DELEGATE COMMITTEE ACTIVITIES

Delegate committees may raise funds and make expenditures for activities to promote their selection as delegates or alternates to the Democratic National Convention. While the delegate committees are responsible for conducting their own affairs, they may confer with the Mondale campaign with respect to activities to further the delegates' selection.

To finance these activities, contributions to a delegate committee should be sent to the treasurer of the committee and deposited in the committee's account. All expenditures by the committee must be made from this account.

An outline of the contributions that delegate committees may and may not accept and the expenditures that delegate committees may and may not make is set forth below.

Contributions to Delegate Committees

A. Delegate Committees May Accept Contributions from:

1. Individuals

a. Individuals may contribute up to $5,000 per delegate committee, as long as the individuals' $25,000 annual limit is not exceeded. This includes individuals who have already "maxed out" with respect to contributions to the Mondale campaign. Individual delegates may also make such contributions to the delegate committees from their personal funds.

2. Political Action Committees of Labor Unions, Corporations, and Other Organizations

a. PACs may contribute up to $5000 per delegate committee. Although it is the policy of the Mondale campaign not to accept PAC contributions, delegate committees may make their own decisions regarding such contributions.

B. Delegate Committees May Not Accept Contributions from Corporations, Labor Unions, National Banks, Foreign Nationals, or Federal Contractors.

A. Delegate Committees May Make Expenditures for:

1. Yard signs, posters, brochures, bumper stickers, buttons, pins, and other small items.

a. These materials must be distributed in connection with volunteer activity.

b. The materials must advocate the election of the delegates and may mention Mondale (e.g., "Vote for XYZ Mondale Delegate Committee and help us elect Walter Mondale"). There are no requirements as to the size of the print or the portion of the materials which may be devoted to discussion of Mondale and his positions.

c. There must be a disclaimer stating "Paid for by XYZ Delegate Committee and Not Authorized by the Mondale for President Committee" on all delegate committee material. This disclaimer is not required for bumper stickers, buttons, pins, and other small items.

2. Reimbursing volunteers for expenses incurred

a. The amount of reimbursement should not exceed $15 to $25 per day for expenses such as travel and subsistence.

3. Costs of mailing brochures and other materials (i.e., printing and postage)

a. These materials must be mailed only to individuals on lists developed by the delegate committees. Commercial direct mail companies may not be used.

4. Costs of Voter Registration and Get-Out-The-Vote Activities

a. These activities (e.g., transporting voters to polls) should be aimed at getting voters to vote for the Mondale delegate slates.

5. Costs of Election Night Parties

a. These parties may be for volunteers to celebrate the selection of delegates for Mondale.

6. Costs of Activities to Raise Additional Funds for the Delegate Committees

a. Delegate committees may use the contributions they receive to raise additional funds.

7. Costs of Volunteer Headquarters and Staff

a. Under certain circumstances, the costs of a headquarters for volunteers and compensation of a volunteer coordinator may be paid for. If this is planned, please consult with the legal staff.

B. Delegate Committees May Not Make Expenditures for

1. Billboards, radio and television advertising or any other communications aimed at the general public.

2. Costs of mailing brochures and other materials to individuals on lists prepared by commercial vendors, the Mondale campaign, or anyone else other than the delegate committees.

Mondale for President
2201 Wisconsin Avenue, N.W.
Washington, D.C. 20007
Telephone: 202-625-1984

MONDALE

TO: MONDALE DELEGATES

FROM: ELAINE KAMARCK

DATE: JANUARY 12, 1984

RE: CONDUCTING YOUR CAMPAIGN FOR DELEGATE TO THE NATIONAL CONVENTION

Under the federal election laws, persons seeking election as delegates or alternates to the National Convention can form committees which are allowed to raise and expend money to support their candidacies. Care must be taken to assure that the enclosed legal guidelines are followed. This program can be of enormous benefit in assuring your election as a delegate. Following is a brief outline on how these committees should work.

I. Forming the Committee

Immediately upon being slated as a Mondale delegate, the campaign will assist each slate of delegates in forming a committee if they so desire. A memorandum explaining the legal procedures for forming a committee and registering and reporting to the FEC accompany this memo.

II. Raising Money

As soon as possible, the delegate committees should develop a fundraising plan which contains the following components:

1. Plan one or more grass roots fundraisers in your Congressional District

2. Solicit other Mondale supporters in your district for contributions to the Committee. (IMPORTANT NOTE: A person who has contributed the maximum amount to the Mondale campaign is allowed to make a contribution of up to $5,000 per person to each Mondale delegate committee subject only to the annual $25,000 limit per individual on contributions to all federal candidates.)

3. Solicit local organizations to which you may belong for contributions. (IMPORTANT NOTE: Contributions by corporations, labor unions, foreign nationals and federal contractors are not permitted. But

EXHIBIT 3

Paid for by Mondale for President, Inc.

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Mondale for President
2201 Wisconsin Avenue, N.W.
Washington, D.C. 20007
Telephone: 202-625-1984

MONDALE

contributions from Political Action Committees of issue groups or labor unions are permitted. Individuals and Political Action Committees can contribute up to five thousand dollars to a delegate committee. Walter Mondale has made a decision not to accept money from P.A.C.'s for his campaign. Each delegate committee may make their own decision regarding P.A.C. money.)

III. Spending Money

The money raised by Delegate Committees must be spent in the district on the conduct of a grassroots campaign. Under no circumstances can money be spent for general public advertising such as T.V., radio, newspaper ads, billboards or direct mail.

Money can be spent for campaign materials to be used by volunteers such as bumper stickers, handbills, brochures, posters and yard signs which advocate the selection of a group of delegates. These materials may include information about the Mondale candidacy as well as information about the delegate candidates. There are no requirements as to the the amount of space which must be devoted to the delegate-candidates versus the amount of space devoted to Mondale, provided the purpose and message are directed towards the selection of the delegate candidates.

Before spending any money:

- Design your campaign materials.
- Arrange for a volunteer group to distribute materials.
- Plan a "Get Out the Vote" program using volunteers. (IMPORTANT NOTE: Delegate Committees can reimburse volunteers for their expenses.)

IV. Reporting

You will have to file quarterly reports with the Federal Election Commission. Therefore be sure to:

- Keep careful records of all receipts and expenditures.
- Write checks whenever possible for all expenditures so that record keeping is easier.
- Please follow the instructions on the enclosed memorandum and when in doubt do not hesitate to call the Office of the Legal Counsel here at the campaign headquarters.

Paid for by Mondale for President, Inc.

3504015937

On March 20th Vote for:

WALTER MONDALE
FOR PRESIDENT



AND THE MONDALE DELEGATES
(VOTE FOR 4)

- ☒ **GEORGE E. SANGMEISTER** (MONDALE)
- ☒ **E. KAREN VOGEL** (MONDALE)
- ☒ **MARJORIE FRIEDMAN** (MONDALE)
- ☒ **CHARLES E. HANUS, JR.** (MONDALE)

MONDALE ALTERNATE
(VOTE FOR 1)

- ☒ **DANIEL L. VERA** (MONDALE)

On Key Issues, Good Ideas Top 'New Ideas'...Mondale Tops Hart

ISSUE	MONDALE	HART
Help for the Jobless	As Senator, consistently supported improved, extended benefits for jobless workers. Backs special aid for workers displaced by imports.	Twice has voted against extended unemployment comp; backed Reagan cuts in special help for thousands of workers displaced by imports.
Gas Price Control	Supports continued control of gas/oil prices to protect consumers from huge increases in home fuel bills.	Voted to deregulate price of newly-found natural gas; calls for 30% tax on imported fuel, would add $140 to average home fuel bill.

Paid for by 4th District Mondale Delegate Committee, Terrie Hanus Treas.

POL. ADV.

3524051583

EXHIBIT 4

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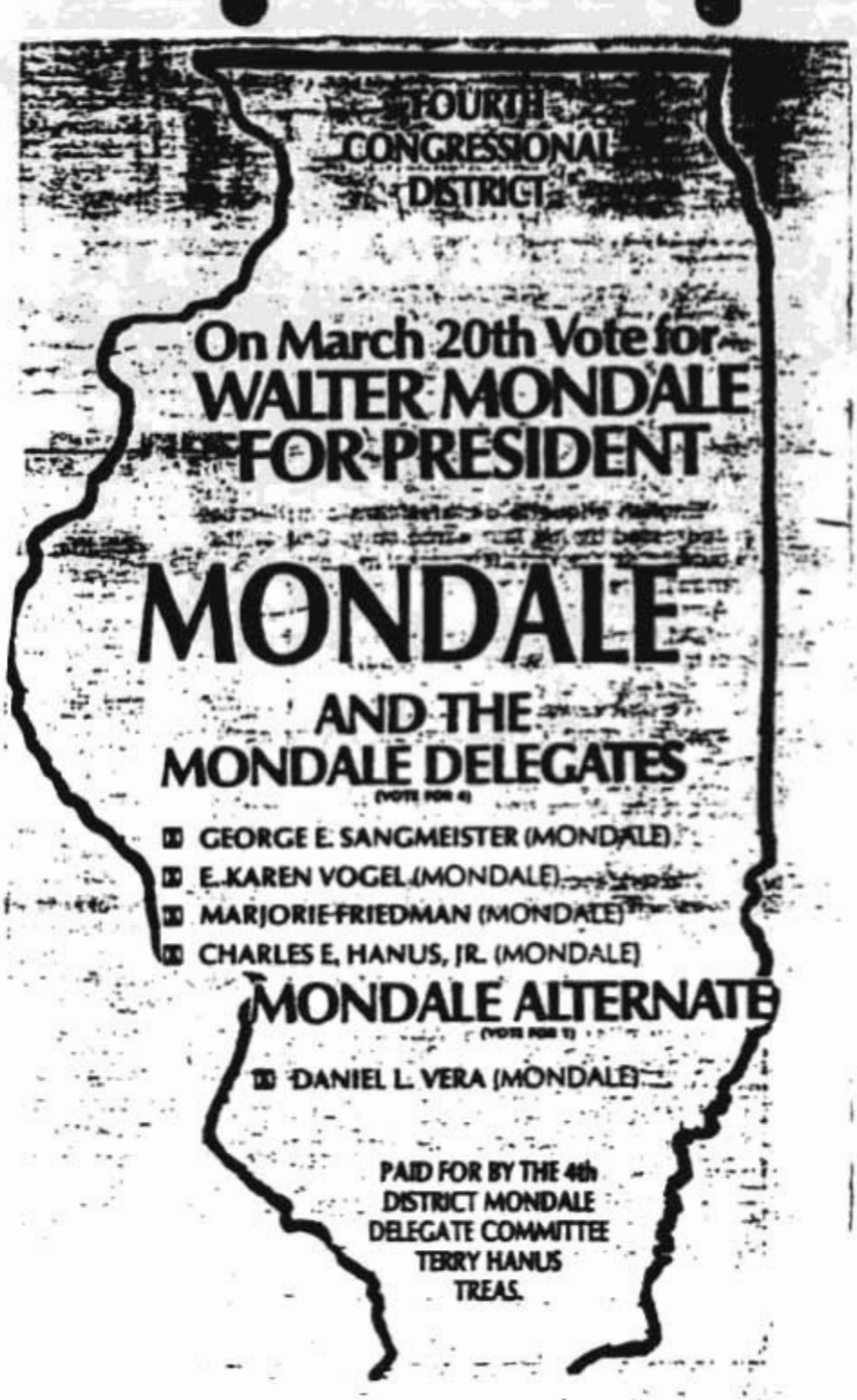
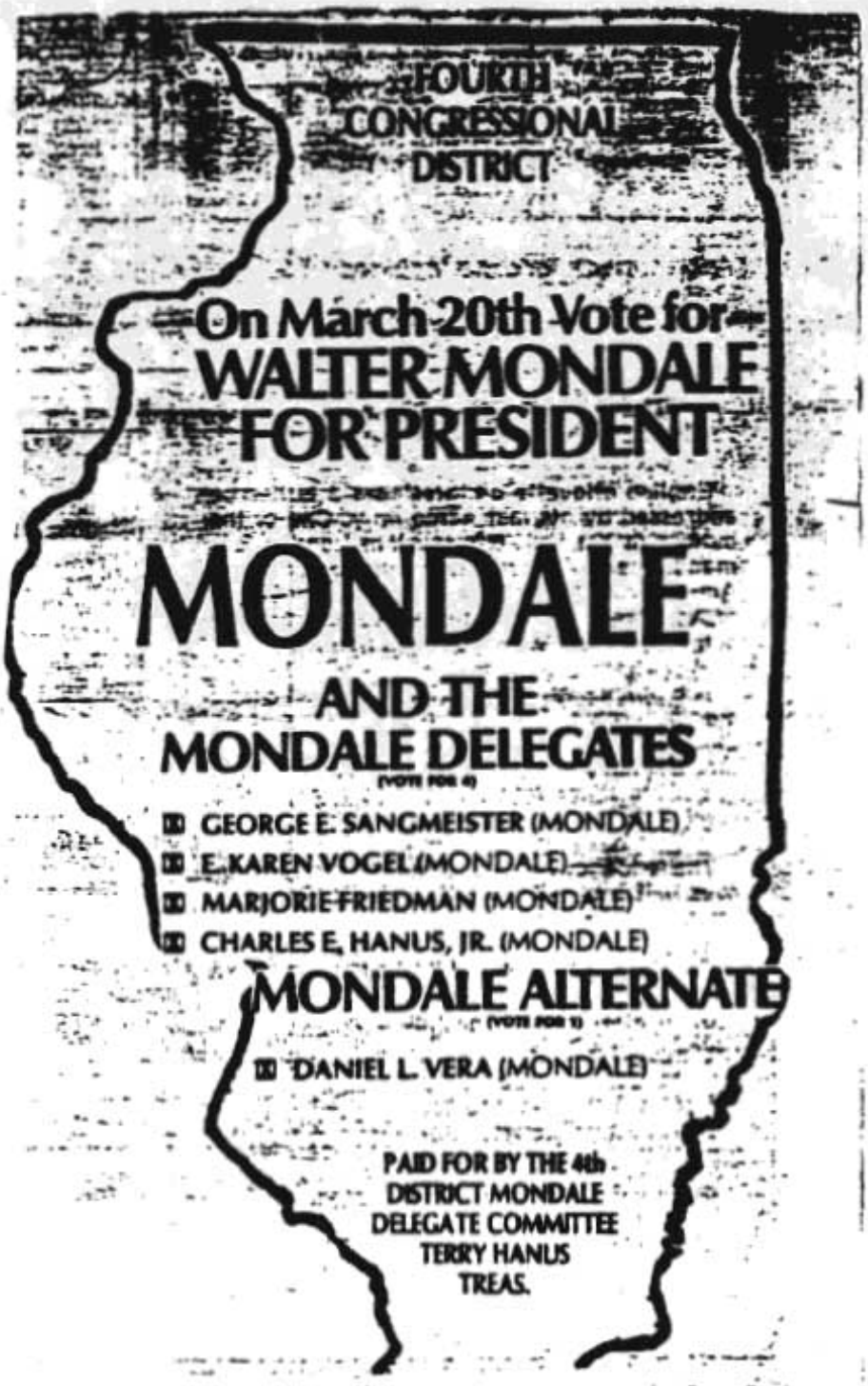


EXHIBIT 5



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EXHIBIT 6

8504050159 1

LAW OFFICES OF
RIEDMAN & KOVEN
300 SOUTH LA SALLE STREET
CHICAGO 60604

RECEIVED BY THE FEC
84 MAY 22 A 8:58

Charles N. Steele, Esq.
General Counsel
Federal Election Commission
1325 K Street, N. W.
Washington, DC 20463

RECEIVED BY THE FEC
Ca#.3171
84 MAY 16 P1:00

LAW OFFICES
FRIEDMAN & KOVEN
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
208 SOUTH LA SALLE STREET
CHICAGO, ILLINOIS 60604
(312) 346-6500
CABLE ADDRESS "FREEZON"
TELEX 254083

MICHAEL D. SHER
DIRECT TELEPHONE NUMBER
(312) 269-0609

May 15, 1985

MUR1667
mimp

MAY 16 P2:41

FEDERAL EXPRESS

Charles N. Steele, Esq.
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, DC 20463

Re: MUR 1667

Dear Mr. Steele:

Enclosed is the Statement of Designation of Counsel of the Fourth District (Illinois) Mondale Delegate Committee (the "Delegate Committee"), which designates me as counsel for the Delegate Committee in connection with the above-referenced proceeding before the Federal Election Commission. The Delegate Committee received a copy of the complaint and supplements thereto on May 7, 1984. Accordingly, the Delegate Committee's response is due to be filed with the Federal Election Commission on or before May 22, 1984. Since I was recently contacted by the Delegate Committee to represent them in the proceeding before the Commission and in view of the significant volume of the submissions already on file in connection with this matter, I hereby respectfully request an extension of 15 days, to and including June 6, 1984, to respond to the complaint filed in this proceeding.

Thank you for your consideration.

Very truly yours,

Michael D. Sher

Michael D. Sher

MDS:ji

Enclosure

3504053159 2

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1667

NAME OF COUNSEL: MICHAEL D. SHER

ADDRESS: FRIEDMAN & KOVEN
Room 900
208 S. LASALLE ST.
CHICAGO, IL 60604

TELEPHONE: (312) 269-9605

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.

5-8-84
Date

Terrie L Hasse, Treasurer
Signature

RESPONDENT'S NAME: 4TH DISTRICT MANDALE DELEGATE Committee

ADDRESS: 1210 TIMBER PL
NEW LENOX, IL
60451

HOME PHONE: (815) 485-4017

BUSINESS PHONE:

3504005015593

Cca # 3558

RECEIVED FEC

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LAW OFFICES

FRIEDMAN & KOVEN

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

208 SOUTH LA SALLE STREET

CHICAGO, ILLINOIS 60604

(312) 346-6800

CABLE ADDRESS "FREEZON"

TELEX 254083

MICHAEL D. SHER

DIRECT TELEPHONE NUMBER:

(312) 922-9606

June 8, 1984

Mr. John D. Gibson
Assistant Staff Director
Reports Analysis Division
Federal Election Commission
1325 K Street, N. W.
Washington, DC 20463

Re: MUR 1667

Dear Mr. Gibson:

I have been designated as counsel for Mondale Delegate Committees from the Third, Fourth, Seventh, Ninth, Eleventh, Twelfth, Fourteenth, Seventeenth, Nineteenth, Twentieth, Twenty-First and Twenty-Second Districts from the State of Illinois (the "Delegate Committees") in the above-referenced proceeding before the Federal Election Commission (the "Commission"). The treasurers of certain of the Delegate Committees have received letters from you, all dated May 16, 1984, which advise the Delegate Committees that in view of the above-referenced proceeding before the Commission, "the Federal Election Commission cannot approve any requests for termination from your committee, at this time." Your letter further reminds the committees "that until termination is authorized, your reporting requirements under 2 U.S.C. § 434 continue."

On behalf of the Delegate Committees, I respectfully suggest that neither Section 434, Section 433(d) nor 11 C.F.R. § 102.3 supports your contention that continued reporting is required by the Delegate Committees until such time as the Commission approves requests for termination. I am unaware of any authority which supports the Commission's apparent position that its authorization is necessary for the termination of a political committee, where that committee "no longer receive[s] any contributions or make[s] any disbursements that would otherwise qualify it as a political committee" and where that committee "has no outstanding debts and obligations." 11 C.F.R. § 102.3(a). Therefore, there appears to be no legal basis for your assertion that the Delegate Committees, which no longer conduct any activities, are required to report to the Commission pursuant to Section 434 until such time as their termination is "approved" by the Commission.

Accordingly, until such time as the Commission explains by what authority it can continue to compel inactive political committees to file reports pursuant to Section 434, the Delegate Committees presently intend to file the appropriate termination reports on the appropriate FEC Forms in accordance with 11 C.F.R. § 102.3, or have already done

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so in certain instances. Based upon the express provisions of Sections 433(d) and 434 of Title 2, and 11 C.F.R. § 102.3 promulgated pursuant thereto, the Delegate Committees respectfully submit that they are not required, nor do they presently intend, to file any additional quarterly reports with the Commission, as such is not required by any of the aforesaid provisions. Please advise me of the Commission's position regarding this matter and whether it has or will reconsider the position expressed in your letter of May 16. Thank you.

Very truly yours,

Michael D. Sher

Michael D. Sher

MDS:jl

cc: Charles N. Steele, Esq.

8504059159

MAN & KOVEN
OUTH LA SALLE STREET
GO, ILLINOIS 60604

8 JUN 1988

Mr. John D. Gibson
Assistant Staff Director
Reports Analysis Division
Federal Election Commission
1325 K Street, N. W.
Washington, DC 20463

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1704

NAME OF COUNSEL: Michael D. Sher
FRIEDMAN & KOVEN

ADDRESS: 208 South LaSalle Street
Suite 900
Chicago, Illinois 60604

TELEPHONE: (312)269-9605

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.

6/6/84
Date

Lenore T. Colson
Signature

Third Congressional District Delegates for Mondale

RESPONDENT'S NAME: Lenore T. Colson

ADDRESS: 4312 West 107th Placae
Oak Lawn, Illinois 60453

HOME PHONE: (312)423-7995

BUSINESS PHONE: N/A

RECEIVED
JUN - 7 1984
MICHAEL D. SHER

3504015097

RECEIVED BY THE FEC

84 MAY 22 A 9:50

LAW OFFICES

FRIEDMAN & KOVEN

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

208 SOUTH LA SALLE STREET

CHICAGO, ILLINOIS 60604

(312) 348-8500

CABLE ADDRESS "FREEZON"

TELEX 254083

MICHAEL D. SHER

DIRECT TELEPHONE NUMBER

(312) 269-8605

3rd Dist

May 21, 1985

Charles N. Steele, Esq.
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, DC 20463

Illinois

Re: MUR 1667

Dear Mr. Steele:

Enclosed are the Statements of Designation of Counsel of the Third Congressional District (Illinois) Delegates for Mondale and the Ninth District (Illinois) Mondale Delegate Committee which designate me as counsel for those Delegate Committees in the above-referenced proceeding. I will file responses on behalf of those Delegate Committees with the Commission in accordance with the Federal Election Campaign Act.

Very truly yours,

Michael D. Sher

Michael D. Sher

MDS:ji

Enclosures

cc: Mr. Greg A. Kinczpuski
Ms. Lenore T. Colson

8504031599

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1667

NAME OF COUNSEL: MICHAEL SHER

ADDRESS: FRIEDMAN AND KOVEN
208 So. LA SALLE ST.
ROOM 900 - CHICAGO, IL 60604

TELEPHONE: 312-269-9605

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.

5-21-84
Date

Lenore T. Colson
Signature
Treasurer - 3rd C.D.

RESPONDENT'S NAME: 3RD CONGRESSIONAL DISTRICT DELEGATES FOR MONDALE

ADDRESS: 4312 W. 107TH PLACE
OAK LAWN, IL. 60453

HOME PHONE: 312-423-7995

BUSINESS PHONE: —

8504050159

MAN & KOVEN
OUTH LA SALLE STREET
GO, ILLINOIS 60604

RECEIVED AT THE FEC

84 MAY 22 A9:58

Charles N. Steele, Esq.
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, DC 20463

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Lenore T. Colson, Treasurer
Third Congressional District
Delegates For Mondale
4312 West 107th Drive
Oak Lawn, IN 60453

Re: MUR 1667

Dear Ms. Colson:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you intend to be represented by counsel in this matter please advise the Commission by 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.

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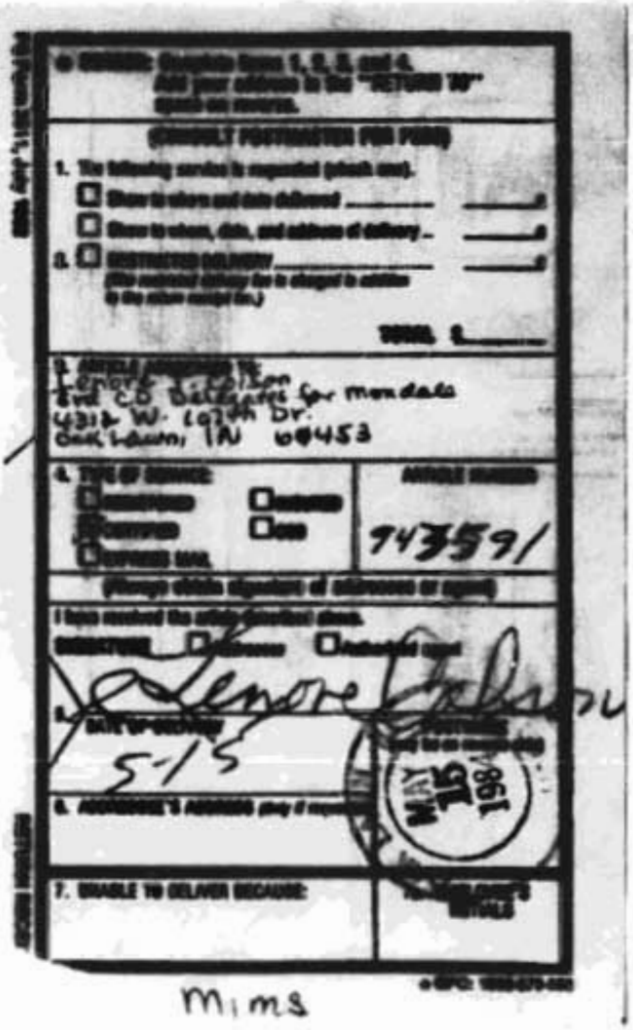
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

Enclosures
1. Complaint
2. Procedures
3. Designation of Counsel Statement



Mims

95240501602

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Sheila A. Rivers, Treasurer
Second Congressional
District Delegates
For Mondale
11151 S. King Drive
Chicago, IL 60628

Re: MUR 1667

Dear Ms. Rivers:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against the committee and you, as treasurer, in connection with this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you intend to be represented by counsel in this matter please advise the Commission by 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.

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If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

Enclosures
1. Complaint
2. Procedures
3. Designation of Counsel Statement

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Ecf # 3294
RECEIVED AT THE FEC

84 MAY 25 AM 11:

Mims
MUR 1667

Chicago Ill
May 17, 1984

Federal Election Commission
Washington D. C. 20463
Re MUR 1667

To Whom it May Concern:

This letter is to inform you of the actions taken by the First Congressional Delegates for Mondale in the City of Chicago and the State of Illinois. January 31 to March 31, 1984 our funds were raised through personal donations of the individual delegates and one public fund raiser. We did receive $1,000.00 from each of two labor unions. These funds were obtained by delegate union members to assist in the election of these two union members . Our main objective was to become elected as individuals in the March 20, 1984, Primary Election. All delegate activity ceased as of March 31, 1984. Final papers were filed with FEC and Ill EC prior to April 15, 1984.

In View of the foregoing statement I do not believe legal action should be taken against the committee slate or the Treasurer.

Sincerely,

Georgia E. Trevan

Mrs. Georgia E. Trevan, Treas
First Congressional
District Delegates for
Mondale
9401 So. Michigan
Chicago Ill 60619

attachments:

Subscribed and sworn to before me
this 21st Day of May 1984
at Chicago, County of Cook, State of Illinois
Irene A. Bradford
Notary Public

85040501605

Myles

BOB: Below article to be run with Sheet #AG 31663. Picture # 2-- James W. Myles.

(SAVE)
1-27-84

FOR JANUARY-FEBRUARY, 1984 LOCAL 73 JOURNAL

By: James W. Myles, Union Representative
& Executive Board Member

I am very proud to announce I have been selected to run for election as a delegate to the National Democratic Convention. If elected, I will be a delegate pledged to the candidacy of Walter F. Mondale for president.

The primary election will be held on Tuesday, March 20, 1984, and my name will appear on the ballot that will be used in the 1st Congressional District.

I urge you to vote for me and also the other delegates pledged to the Mondale candidacy. We will need your help in this campaign. If you would like to volunteer some of your time, please call me at 787-5868. If I'm not in at the time, please leave your name and telephone number with DeLane Warren or Marguerite Feliciano and I will get back to you.

My reason for seeking the honor of becoming a Mondale pledged delegate is my belief that, under his leadership, our country will move into strong economic recovery. He will create government programs that will give hope to the poor and downtrodden of this great country and also giving more economic relief to the lower and upper middle class working Americans. I believe medical, Social Security and other people orientated programs will, again, be reinstated in our country. I further believe a strong civil rights platform would guarantee equal rights for all Americans. By becoming a delegate to the Convention, not only would I be an asset to the membership of Local 73-HELP!, but also to the vast numbers of people who reside in the 1st Congressional District.

Remember: There are two important Mondale votes on

8504050160 6

March 20th. When you vote "Democrat", vote once for "Mondale" in the preference poll, and vote once for each Mondale delegate.

Also running on the Mondale ticket for delegates are: Milton Moses, Howard T. Savage, Sr., Edna Selan Epstein, Marjorie B. Brantley, Georgia E. Trevan, Leroy Davis, Rodney Franklin, and Margaret Polk. Running as alternate delegates are: Clyde Ross, George V. White and Ronald L. Carter.

8504050160 7

MONDALE FOR PRESIDENT

Committee to Elect Mondale for President
P.O. Box 09074-2074 • Chicago, Illinois 60690

FIRST CONGRESSIONAL DISTRICT
DELEGATES FOR WALTER F. MONDALE

MARJORIE B. BRANTLEY
S.C.T. International Union AFL-CIO,CLC
Local 300 - Fin. Secty.-Treas. & Bus. Rep.

LEROY DAVIS
Illinois Federation of Teachers

EDNA SELAN EPSTEIN
Attorney

ROONEY FRANKLIN
Community Activist

MILTON E. MOSES
President, Community Insurance Co.

JAMES W. MYLES JR.
SEIU International Union AFL-CIO
Local 73-Business Representative
Executive Board Member

MARGARET POLK
Steel Workers International Union AFL-CIO
Union Official

HOWARD T. SAVAGE, SR.
Attorney

GEORGIA E. TREVAN
President, West Chesterfield Assn.

ALTERNATES

RONALD L. CART[illegible]
President, Grea[illegible]nseland [illegible]

CLYDE ROSS
Businessman

GEORGE V. WHI[illegible]
Community Lea[illegible] [illegible] Library

March 12, 1984

Dear Friend and Neighbor:

I am running in the March 20 Democratic Primary as a delegate for the Democratic National Convention. I am pledged to Walter Mondale which means that if elected I must vote for him on the first ballot.

If you vote in the Democratic Primary on March 20, you may select nine delegates to go to the Democratic Convention in July. Please make one of your votes a vote for me. My name will appear somewhere toward the middle of a list of approximately thirty to forty individuals.

For those of you who do not know me, I have lived in Hyde Park for seventeen years and am a lawyer and partner in a large downtown law firm. Formerly I was Assistant State's Attorney in charge of rape felony prosecutions for all of Cook County. My husband works at the University in the Department of Biochemistry and my three children, Matthew, Ezra and Tanya have gone to schools in Hyde Park.

I am firmly convinced that the principles of the Democratic party which believes in fairness for all elements of our diverse and complex country are sound, although new thinking on economic issues and military and foreign policy must be evolved. I would welcome an opportunity to be active to effect those ends. Please give the Mondale slate of delegates your vote.

Sincerely,

Edna Selan Epstein

Edna Selan Epstein

ESE/dlb

8504.0

Authorized and paid for by the First Congressional District Delegates for Mondale Committee.
A copy of our report on file with the Federal Election Commission, Washington, D.C.

MONDALE FOR PRESIDENT

Committee to Elect Mondale for President
P.O. Box 09074-2074 • Chicago, Illinois 60690

FIRST CONGRESSIONAL DISTRICT
DELEGATES FOR WALTER F. MONDALE

MARJORIE B. BRANTLEY
B.C.T. International Union AFL-CIO,CLC
Local 300 - Fin. Secty.-Treas. & Bus. Rep.

LEROY DAVIS
Illinois Federation of Teachers

EDNA SELAN EPSTEIN
Attorney

RODNEY FRANKLIN
Community Activist

MILTON E. MOSES
President, Community Insurance Co.

JAMES W. MYLES JR.
SEIU International Union AFL-CIO
Local 73-Business Representative
Executive Board Member

MARGARET POLK
Steel Workers International Union AFL-CIO
Union Official

HOWARD T. SAVAGE, SR.
Attorney

GEORGIA E. TREVAN
President, West Chesterfield Assn.

ALTERNATES

RONALD L. CARTER
President, Greater Roseland Assn.

CLYDE ROSS
Businessman

GEORGE V. WHITE
Community Leader - Chicago Public Library

March 6, 1984

Dear Friend:

On March 20, 1984 we will all be going to the polls to cast our ballots in the Democratic Primary election.

We the delegates committed to Walter F. Mondale reside in the First Congressional District and we are asking for your support in this most crucial election.

We will briefly tell you why we feel it is paramount that every registered voter in the First Congressional District should make this the number one issue on their agenda on March 20th.

In the past four years we have seen the REAGAN ADMINISTRATION slowly but surely destroy the poor, the Black and the most NEEDY. IT IS AN ADMINISTRATION THAT BELIEVES IN THE RICH GETS RICHER AND THE POOR GETS POORER.

It is time that the silent majority must stand up and be heard.

On March 20, all the delegates that are listed to the left on this letter are seeking your vote for their candidacy as delegates and for your vote for Walter F. Mondale for President.

We urge you to make a special effort to get to the polls and cast your vote.

Walter F. Mondale for President and the delegates that are listed herein.

Sincerely,

Marjorie B. Brantley

Marjorie B. Brantley
Delegate - First Congressional District

Authorized and paid for by the First Congressional District Delegates for Mondale Committee
A copy of our report on file with the Federal Election Commission, Washington, D.C.



(not pictured: MILTON E. MOSES, GEORGE V. WHITE)

Support the Delegates Who Support Mondale

The 1st District Mondale Slate

MILTON E. MOSES, President, Community Insurance Center Inc.

HOWARD T. SAVAGE, SR., Attorney at Law, actively engaged in the practice of law in the city of Chicago

EDNA SELAN EPSTEIN, Partner, Sidley & Austin

MARJORIE B. BRANTLEY, Financial Secretary-Treasurer, Local 300, Bakery, Confectionery and Tobacco Worker's International Union

JAMES W. MYLES, Business Representative-Executive Board member, Local 73, Service Employees International Union

GEORGIA E. TREVAN, President, West Chesterfield Community Organization and retired educator

LEROY DAVIS, School delegate, Chicago Teachers Union, American Federation of Teachers

RODNEY FRANKLIN, Legal clerk, Sidley & Austin. Community activist.

MARGARET POLK, Vice President, Local 2645, United Steelworkers of America

Alternates

CLYDE ROSS, Businessman and community activist

GEORGE V. WHITE, Former board member, Chicago Public Library. Community activist

RONALD L. CARTER, Executive Director, Greater Rowland Organization

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On March 20th Vote for WALTER MONDALE FOR PRESIDENT

AND THE MONDALE DELEGATES

(VOTE FOR 9)

- ☐ **MILTON E. MOSES** (MONDALE) #70
- ☐ **HOWARD T. SAVAGE, SR.** (MONDALE) #71
- ☐ **EDNA SELAN EPSTEIN** (MONDALE) #72
- ☐ **MARJORIE B. BRANTLEY** (MONDALE) #73
- ☐ **JAMES W. MYLES, JR.** (MONDALE) #74
- ☐ **GEORGIA E. TREVAN** (MONDALE) #75
- ☐ **LEROY DAVIS** (MONDALE) #76
- ☐ **RODNEY FRANKLIN** (MONDALE) #79
- ☐ **MARGARET POLK** (MONDALE) #80

MONDALE ALTERNATES

(VOTE FOR 3)

- ☐ **CLYDE ROSS** (MONDALE) #91
- ☐ **GEORGE V. WHITE** (MONDALE) #92
- ☐ **RONALD L. CARTER** (MONDALE) #93



ILLINOIS FOR MONDALE

Chicago
30 W. Washington, #530
Chicago, IL 60602
(312) 368-1984

Springfield
601 N. First Street
Springfield, IL 62702
(217) 522-9850

Paid for by the 1st District Mondale Delegate Committee

WALTER MONDALE



THE EXPERIENCE TO KNOW WHAT WE NEED TO CHANGE... THE STRENGTH TO MAKE IT HAPPEN

America must be number one — not in international competition. America must be just again — a nation not for the rich alone, but for everyone. America must use its strength for peace again, and lead the world back from the brink. A future of growth, fairness, and hope — that is why I seek the presidency. — Walter Mondale



A Competitive America

Walter Mondale wants to get our nation's competitive edge back. Our economy was once the strongest, most productive on earth. But today America's best jobs are being exported, basic industries are declining, farm products can't compete in world markets and small businesses are shut off from affordable credit.

Mondale believes we must **chop the Reagan deficits** to reduce interest rates; **fight for fair trade** so that America begins to get an even break against foreign competition; **revitalize our basic industries and infrastructure** to insure that "Made in America" once again means the best; **invest in people** to make this next generation of Americans the best-educated and trained in our history.





A Fair America

Mondale thinks it's time to restore the basic American values of fairness, decency and opportunity to government policy. We need to **close the tax loopholes and catch the tax cheaters** so that every corporation and every individual pay their fair share; **enforce our civil rights laws** and redouble our efforts to gain **equal rights for women**—with a Constitutional Amendment to back it up; **protect Social Security and Medicare;** lighten the load on the hungry, the handicapped and the unemployed. Mondale will **fight for the average American** who is confronted with rising utility bills, tuition fees and interest rates, and bring an end to government of the rich, by the rich, for the rich.

A Safer World

Mondale will keep America strong and use that strength to wage peace and prevent war.

We need a President who sees the world as it really is; who understands that we should use force as a last, not a first resort; who recognizes the necessity of reducing the risk of nuclear war.

Mondale will be that President. He will **stabilize relations with the Soviets** by meeting them on the common ground of global survival; **maintain a strong defense,** while keeping the Pentagon in check; **work with our allies** while negotiating with our adversaries. Mondale will speak up for American principles by demonstrating that the United States not only stands tall, but stands by its values.



401 So. Michigan Ave
Chic



RETURN RECEIPT REQUESTED

Federal Election Commission
1325 K. Street N.W.
Washington, D.C. 20463

Attention: General Counsel

CERTIFIED
P 635 104 458
MAIL

9401 So. Michigan Ave
Chic

8504050161 5

CHICAGO, IL
PM
22 MAY



RETURN RECEIPT
REQUESTED

Federal Election Commission
1325 K. Street N.W.
Washington, D.C. 20463

Attention: General Counsel

CERTIFIED
P 635 104 458
MAIL

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Georgia E. Trevan, Treasurer
1st Congressional District
Delegates For Walter Mondale
9401 South Michigan Avenue
Chicago, IL 60619

Re: MUR 1667

Dear Ms. Trevan:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against the committee and you, as treasurer, in connection with this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you intend to be represented by counsel in this matter please advise the Commission by 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.

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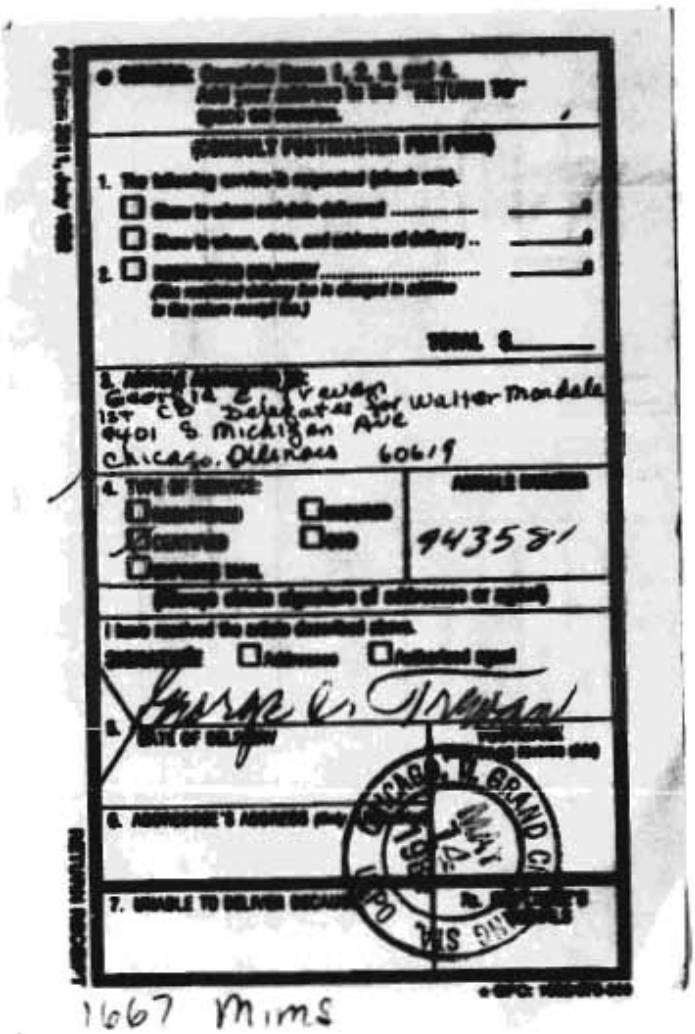
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

Enclosures
1. Complaint
2. Procedures
3. Designation of Counsel Statement



3 5 7 4 0 5 9 1 6 1 7

MCC 0453
RECEIVED BY THE FEC
84 JUN 4 P1:28

May 30, 1984

Larry La Rocco, Treasurer
Idaho Delegates for Mondale
P O Box 2215
Boise, Idaho 83701

MUR 1661
Memo

CERTIFIED MAIL

Mr. Lawrence M. Noble
Deputy General Counsel
Federal Election Commission
Washington, D.C. 20463

Dear Mr. Noble:

Your letter of May 11, 1984, arrived in Idaho on May 15th. The Idaho Presidential Caucuses occurred on May 24th and caused some delay in responding to your request for a history of the Idaho Delegates for Mondale Committee. I am assuming, however, that today's postmark of May 30th is within the legal deadline. I'm not entirely sure what information you want, but I'm certainly willing to tell you all I know about our committee, which was in existence for two and one-half weeks and raised a total of $365.00.

Early this year, those of us who were supporting Walter Mondale in Idaho gathered to discuss various matters relating to his campaign. The most urgent need seemed to us to be funding to help Mondale delegates be elected at the Democratic caucuses in late May. We were told by the Mondale for President Committee in Washington, D.C., however, that they did not have a budget for Idaho. We were, then, faced with the awkward situation of not being able to obtain money from Washington and not being able to raise our own.

In late March, the volunteer recordskeeper, Clareene Wharry, called the Washington Mondale office to explain our dilemma and to ask if they had any suggestions. She was told that it was legal for us to form our own separate committee and to raise and expend our own money within Idaho. The group made the decision in late March to form the Idaho Delegates for Mondale Committee.

From here on, it seems simpler to do a date line so the sequence of events will be clear:

April 11, 1984: Statement of Organization for Idaho Delegates for Mondale was filed with the Federal Election Commission. (Copy attached) (1)

April 11, 1984: Checking account opened at Farmers and Merchants State Bank, Boise branch, with a $25 contribution from Karl Shurtliff. (Copy attached) (2)

(more)

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April 16, 1984: Idaho Delegates for Mondale Committee assigned FEC Id. No. C00181966. (Copy attached)(3)

April 18, 1984: The committee planned a Mondale Party in Ada County for May 11, 1984. Its purpose was to stimulate interest in the caucuses and find Mondale supporters. We ordered invitations (2000) and purchased a Democratic mailing list from the Idaho State Democratic Headquarters. We also ordered some letterhead and envelopes. (Samples attached) (4)

April 25, 1984: Idaho Delegates for Mondale Committee received a telegram from Walter Mondale, asking that the committee be disbanded. (Copy attached) (5)

April 27, 1984: Letter sent to the Federal Election Commission by Larry La Rocco and Cecil D. Andrus, asking that the Idaho Delegates for Mondale Committee be disbanded. (Copy attached) (6)

April 27, 1984: No further contributions accepted after this date.

April 30, 1984: Last check ($32.00) written from checking account to honor April 23rd commitment for postage. No further checks written. Current balance: $34.09. Balance retained in account, pending permission by the Federal Election Commission to terminate. (Copy of April bank statement attached. May statement has not yet been received.) (7)

May 15, 1984: Complaint received from the Federal Election Commission, allowing fifteen days for this reply.

May 28, 1984: Letter received fom the Federal Election Commission, denying request to terminate committee. (Copy attached) (8)

During April and May, Mondale supporters sold small Idaho Mondale buttons for $5.00 each. The one sizable deposit to the Idaho Delegates for Mondale account ($330.00) came from the sale of these pins. All donations are accounted for in the attached FEC report, which will be filed officially by the committee, as required, before July 15, 1984. (9)

(more)

8504030619

Since April 27, any and all contributions, including records of in-kind donations, have been sent directly to the Mondale for President Committee, 2201 Wisconsin Avenue, Suite 100, Washington, D.C. 20007 for inclusion in that committee's report.

In sum: The Idaho Delegates for Mondale was formed on April 11, 1984 and ceased operation on April 30. It raised a total of $365.00, with no PAC contributions, no contributions refunded, and no single contribution of over $25.00. Its expenditures were for a Democratic mailing list for southeastern Idaho, postage, and some photocopying. The keeper of the records for the committee is Clareene Wharry, who may be reached during the day at her office number: 208/343-7676.

I trust this information answers your questions, but if not, please let me know.

Sincerely,

Larry La Rocco

8504050162 0

(see reverse side for instructions)

1. (a) Name of Committee (in Full) Idaho Delegates f[illegible] Mondale ☐ Check if name or address is changed.	2. [illegible] April 11, 1984 (1)
(b) Address (number and Street) 537 W. Bannock, Suite 201, Boise, Idaho 83702	3. FEC Identification Number
(c) City, State and ZIP Code Boise, Idaho 83702	4. Is this an amended Statement? ☐ YES ☒ NO

5. TYPE OF COMMITTEE (check one):

☐ (a) This committee is a principal campaign committee. (Complete the candidate information below.)

☐ (b) This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)

Name of Candidate	Candidate Party Affiliation	Office Sought	State/District

☒ (c) This committee supports/opposes only one candidate Walter Mondale (name of candidate) and is NOT an authorized committee.

☐ (d) This committee is a _____ (National, State or subordinate) committee of the _____ (Democratic, Republican, etc.) Party.

☐ (e) This committee is a separate segregated fund.

☐ (f) This committee supports/opposes more than one Federal candidate and is NOT a separate segregated fund nor a party committee.

6. Name of Any Connected Organization or Affiliated Committee	Mailing Address and ZIP Code	Relationship
None		

If the registering political committee has identified a "connected organization" above, please indicate type of organization

☐ Corporation ☐ Corporation w/o Capital Stock ☐ Labor Organization ☐ Membership Organization ☐ Trade Association ☐ Cooperative

7. Custodian of Records: Identify by name, address (phone number – optional) and position, the person in possession of committee books and records.

Full Name	Mailing Address and ZIP Code	Title or Position
Clarecne Wharry	3413 Kootenai, Boise, Idaho 83605	208/344-6625 Ass't Treas.

8. Treasurer: List the name and address (phone number – optional) of the treasurer of the committee; and the name and address of any designated agent (e.g., assistant treasurer).

Full Name	Mailing Address and ZIP Code	Title or Position
Cecil D. Andrus	P O Box 852, Boise, Idaho 83701	Chairman
Larry LaRocco	7500 Cherrywood Drive, Boise, Idaho 83704	Treasurer
Clarecne Wharry	3413 Kootenai St., Boise, Idaho	Ass't Treasurer

9. Banks or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of Bank, Depository, etc.	Mailing Address and ZIP Code
Farmers & Merchants State Bank	340 S. 8th St. , Boise, Idaho 83702

I certify that I have examined this Statement and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer	SIGNATURE OF TREASURER	Date
Larry LaRocco		4/11/84

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. §437g.

For further information contact: Federal Election Commission, Toll Free 800-424-9530, Local 202-523-4068

FEC FORM 1 (2/80)

C 00 1 6 0 2 1 8

(2)

INTEREST, TIME AND CHARGES

a. ANNUAL INTEREST RATE ____ %
b. COMPOUNDED ____
c. ANNUAL YIELD ____ %
d. ASSUMED DAYS/ANNUM ____
e. STATEMENT CYCLE ____
f. DAILY CUT-OFF TIME ____
g. MAINTENANCE FEE $ ____
h. FEE PER WITHDRAWAL ITEM $ ____
i. INSUFFICIENT FUNDS ITEM $ ____
j. OVERDRAFT ITEM $ ____
k. RETURNED DEPOSIT ITEM $ ____
l. STOP PAYMENT REQUEST $ ____
m. STOP PAYMENT RENEWAL $ ____
n. CHECKS (PER ____) $ ____

EXPLANATION

A DORMANT ACCOUNT FEE of $ ____ will be charged each ____ if for (period) there is no activity or other indication in writing from you of an interest in this Account.

TYPE OF ACCOUNT – PERSONAL

- ☐ INDIVIDUAL
- ☐ JOINT - WITH SURVIVORSHIP
- ☐ JOINT - NO SURVIVORSHIP
- ☐ ____
- ☐ TRUST
  - ☐ SEPARATE AGREEMENT
  - ☐ BENEFICIARIES NAMED HEREIN
- ☐ PAY ON DEATH (BENEFICIARIES NAMED HEREIN)

TYPE OF ACCOUNT – BUSINESS

- ☐ SOLE PROPRIETORSHIP
- ☐ PARTNERSHIP
- ☐ CORPORATION - FOR PROFIT
- ☐ CORPORATION - NOT FOR PROFIT
- ☒ Association

DATE April 11, 1984 BY ____
INITIAL DEPOSIT $ 25.00
OCCUPATION(S) Political Committee
TELEPHONE NO.S ____
OTHER BANKING ____

TRUST OR PAY ON DEATH BENEFICIARY DESIGNATION
NAME ____
ADDRESS ____
NAME ____
ADDRESS ____

BUSINESS Idaho Delegates for Mondale
COUNTY AND STATE OF ORGANIZATION Boise, Idaho (Ada)
AUTHORIZATION DATED ____

Clareene Harry, 3413 Kootenai St., Boise, Idaho 83705

X Idaho Delegates for Mondale
NAME OF ACCOUNT

ACCOUNT ADDRESS
X P O Box 2215
Boise, Idaho 83701

SIGNATURES
X ____
X Clareene Harry
X ____

☒ CHECKING ☐ NOW ☐ SAVINGS

FARMERS & MERCHANTS STATE BANK
MERIDIAN, IDAHO 83642

ACCOUNT NUMBER

TAXPAYER IDENTIFICATION NUMBER
X Applied for

UNDER PENALTIES OF PERJURY I certify that the number shown on this form is my correct taxpayer identification number.

UNDER PENALTIES OF PERJURY I CERTIFY THAT I AM (WE ARE) NOT SUBJECT TO BACKUP WITHHOLDING because (a) I am (we are) exempt from backup withholding, or (b) I have not been notified by the Internal Revenue Service that I am subject to backup withholding as a result of a failure to report all interest or dividends, or (c) the Internal Revenue Service has notified me that I am no longer subject to backup withholding.

UNDER PENALTIES OF PERJURY I CERTIFY that I am a U.S. person (including a U.S. resident alien).

X ____

BANKERS SYSTEMS, INC. ST. CLOUD, MINNESOTA 56301 10/21/83

SIGNATURE AGREEMENT CARD

8504030162 2

(3)

FEDERAL ELECTION COMMISSION
1325 K Street, N.W.
Washington, D.C. 20463

ACKNOWLEDGEMENT OF RECEIPT
OF
STATEMENT OF ORGANIZATION

Filed pursuant to the Federal Election Campaign Act of 1971, as amended

LARRY LAROCCO, TREAS.
IDAHO DELEGATES FOR MONDALE
537 W. BANNOCK, SUITE 201
BOISE, IDAHO 83702

DATE: 04/16/84

NOTICE REGARDING FILINGS
UNDER THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED

Your assigned FEC IDENTIFICATION NUMBER is C00181966

In the future this number should be entered on all subsequent reports filed under the Act, as well as on all communications concerning such reports and statements. This acknowledgement will be the only receipt provided directly by the Commission, for documents filed. The Commission recommends that all future filings be mailed Certified or Registered, Return Receipt Requested, in order to insure timeliness of your filings and to provide additional receipts for your records.

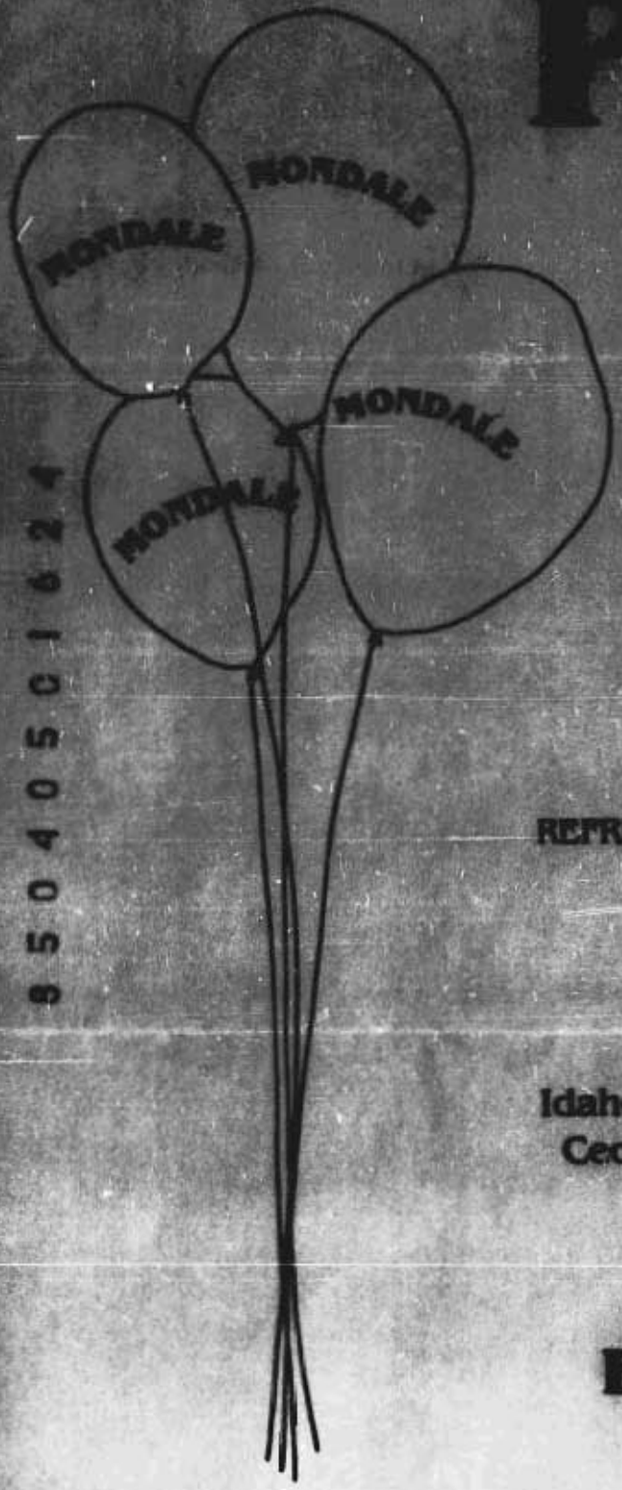
FEDERAL ELECTION COMMISSION

FEC FORM 20 (10/12/76)
(Supersedes FEC Forms 13, 14, and 15)

8504050162

Delegate Selection Pre-Caucus

PARTY



Join us in supporting experienced leadership by attending.

TIME: 7:00 - 9:30 p.m.
DATE: Friday, May 11th
PLACE: 900 W. Washington
RSVP: 343-7676

REFRESHMENTS

NO CHARGE
DONATIONS ACCEPTED

SPONSORED BY:
Delegate Selection Fund —
Idaho Mondale for President Steering Committee,
Cecil D. Andrus & Larry LaRocco, Co-Chairmen.

BRING YOUR FRIENDS & NEIGHBORS

8504050162 4



IDAHO FOR MONDALE

P.O. Box 2215 • Boise, Idaho 83701

Cecil D. Andrus
Larry LaRocco
Co-chairman

Idaho Mondale
Committee
(partial listing)

Sen. Marguerite McLaughlin
John Chapman
Sen. Norma Dobler
The Hon. Joe Williams
Russell E. Webb
John Tait
Carolyn Selander
Marta Parsley
Walter Jones
Sally Blackwell
Sen. Chick Bilyeu
Tim Bird
John F. Greenfield
Rep. George Johnson
Joyce Horvath
Mary Kelly
Chris LaRocco
The Hon. William J. Murphy
Lou Reed
Sen. Jerry Welford
The Hon. Diane Bilyeu
David Blackwell
Robin Greenfield
The Hon. Robert Hosack
Shirley Jones
Jim Kerns
Mercedes McCarter
Sen. Terry Reilly
Glenn Selander
Colleen Bird
Sen. Gail Bray
Cliff Dobler
Wayne Fuller
Rep. Lou Horvath
Paul C. Keeton
Virginia Kerns
Judy Parsley
Christina Bjornstad
Anna Wilson
Barbara Griffin
The Hon. Gary Gould
Rep. Albert Johnson
Michael Ellard
Joe McCarter
Sen. Bert Marley
Rosie Reilly
Sen. Ralph Lacy
Marcy Gould
Nancy Hosack
Karen Jordan
Ray Brandt

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Paid for by Idaho Delegates for Mondale, P.O. Box 2215, Boise, Idaho 83701

MONDALE FOR PRESIDENT, INC.
4201 WISCONSIN AVENUE, NW
WASHINGTON DC 20007 [illegible]

Western Union Mailgram

1-013023E1160II 04/25/84 ICS WAIGGI4 BSEA
20592 MLTN VA 04/25/84

(5)

CECIL AVERIS
P.O. BOX 1122
BOISE, ID 83701

MEMORANDUM

TO: MONDALE STATE CAMPAIGN MANAGERS
FROM: WALTER F. MONDALE
DATE: APRIL 25, 1984

TODAY I INFORMED ALL MONDALE DELEGATES AND ALL TREASURERS OF MONDALE DELEGATE COMMITTEES THAT IT IS MY STRONG REQUEST THAT THEY REFRAIN FROM FORMING NEW DELEGATE COMMITTEES AND MOVE EXPEDITIOUSLY TO TERMINATE EXISTING COMMITTEES. I TOOK THIS STEP BECAUSE I BELIEVE THAT THE DISCUSSION OF THE TECHNICALITIES RELATED TO FEDERAL ELECTION REGULATIONS WAS INTERFERING WITH MY ABILITY TO FOCUS THE DEMOCRATIC PARTY'S DEBATE ON THE MORE CRITICAL ISSUES FACING OUR COUNTRY. IN YOUR STATE, I WANT YOU TO IMMEDIATELY MAKE PERSONAL CONTACT WITH THE TREASURERS OF EXISTING COMMITTEES AND ASK THEM ON MY BEHALF TO TERMINATE THEIR ACTIVITIES CONSISTENT WITH FEDERAL LAW AND TO FILE THE REQUIRED FINAL REPORT AND NOTICE OF TERMINATION. I HOPE YOU MAKE IT CLEAR TO THEM THAT TO CONTINUE DELEGATE COMMITTEE ACTIVITIES WOULD BE CONTRARY TO MY WISHES.

I AM CONFIDENT THAT ALL DELEGATES COMMITTED TO ME AND MY ENTIRE CAMPAIGN HAVE FULLY COMPLIED WITH BOTH THE LETTER AND SPIRIT OF FEDERAL ELECTION LAW. MY DECISION IN NO WAY SUGGESTS ANYTHING TO THE CONTRARY. I AM CONFIDENT THAT THE FEDERAL ELECTION COMMISSION WILL REACH THE SAME CONCLUSION.

THANK YOU FOR YOUR CONTINUING SUPPORT.

11463
2254 EST

MGMCOMP MGM

TO REPLY BY MAILGRAM MESSAGE, SEE REVERSE SIDE FOR WESTERN UNION'S TOLL - FREE PHONE NUMBERS

(6)

CECIL D. ANDRUS

April 27, 1984

Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Dear Sir or Madam:

On April 11, we submitted the attached form to the FEC, requesting the establishment of the Idaho Delegates for Mondale Committee. On April 20, we received the identification number: C00181966.

Now, however, at the request of Mr. Mondale, we are disbanding the committee and accepting no further contributions. Since we have not collected or disbursed funds in excess of $1,000, we are assuming that no further reporting is necessary.

Thank you.

Sincerely,

Larry La Rocco Cecil D. Andrus
Co-Chairmen
Idaho Delegates for Mondale
P.O.Box 2215
Boise, Idaho 83701

8504050162 7

(7)

FARMERS & MERCHANTS STATE BANK

MEMBER F.D.I.C.

IDAHO DELEGATES FOR MONDALE
P.O. BOX 2215
BOISE, IDAHO 83701

5003267100 1
FROM 0-00-00 TO 4-30-84

PREVIOUS BALANCE	NUMBER/TOTAL CREDITS	NUMBER/TOTAL DEBITS	S/C	NEW BALANCE
01 CHECKING				
0.00	2 355.00	2 109.32	.00	245.68

01 CHECKING

DATE	DESCRIPTION	AMOUNT	DAILY BALANCE	
4-12	NEW ACCOUNT DEPOSIT	25.00	4-12	25.00
4-18	DEPOSIT	330.00	4-18	355.00
			4-23	275.00
			4-30	245.68

CHECK NO.	DATE	AMOUNT	CHECK NO.	DATE	AMOUNT
	4-23	80.00	1003	4-30	28.32

8504050162 8

5/30/84
We have not received my statement - cw.

PUT NEW MUSCLE IN YOUR CHECK BOOK WITH FLEX CHECK.

ENCLOSURES

(8)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 16, 1984

Larry Larocco, Treasurer
Idaho Delegates for Mondale
537 West Bannock, Suite 201
Boise, ID 83702

Identification Number: C00181966

Dear Mr. Larocco:

In view of the pending matter under review concerning the Mondale delegate committees, please be advised that the Federal Election Commission cannot approve any requests for termination from your committee, at this time. We will advise you in writing at such time when termination of your committee can be authorized.

You are also reminded that until termination is authorized, your reporting requirements under 2 U.S.C. §434 continue. If you have not yet filed any required report of receipts and disbursements, we urge you to do so as soon as possible.

If you have any questions, please contact Benita Marcus Adler on our toll-free number, (800) 424-9530. Our local number is (202) 523-4048.

Sincerely,

John D. Gibson

John D. Gibson
Assistant Staff Director
Reports Analysis Division

Received 5/28/84
Box 2215

8504016227

(9)

REPORT OF RECEIPTS AND DISBURSEMENTS
For Political Committee Other Than an Authorized Committee

(Summary Page)

ALIGN AREA | | ALIGN AREA

1. Name of Committee (In Full)

IDAHO DELEGATES FOR MONDALE

Address (Number and Street)

537 W. Bannock, Suite 201
P.O. Box 2215

City, State and ZIP Code

Boise, Idaho 83702

☐ Check here if address is different than previously reported.

2. FEC Identification Number

82-0386735

3. ☐ This committee qualified as a multicandidate committee during this Reporting Period on _____ (Date)

4. TYPE OF REPORT (Check appropriate boxes)

(a) ☐ April 15 Quarterly Report ☐ October 15 Quarterly Report
☒ July 15 Quarterly Report ☐ January 31 Year End Report
☐ July 31 Mid Year Report (Non-Election Year Only)
☐ Monthly Report for _____
☐ Twelfth day report preceding _____ (Type of Election)
election on _____ in the State of _____
☐ Thirtieth day report following the General Election
on _____ in the State of _____
☐ Termination Report

(b) Is this Report an Amendment?
☐ YES ☒ NO

SUMMARY	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period 4/1/84 through 6/30/84		
6.(a) Cash on hand January 1, 19 84		$ 00.00
(b) Cash on Hand at Beginning of Reporting Period	$ 00.00	
(c) Total Receipts (from Line 18)	$ 365.00	$ 365.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ 365.00	$ 365.00
7. Total Disbursements (from Line 28)	$ 330.91	$ 330.91
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 34.09	$ 34.09
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)	$ -----	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	$ -----	

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Larry LaRocco
Type or Print Name of Treasurer

SIGNATURE OF TREASURER _____ Date _____

For further information contact:
Federal Election Commission
Toll Free 800 424 9530
Local 202 523 4068

NOTE: Submission of false, erroneous or incomplete information may subject the person signing this report to the penalties of 2 U.S.C. § 437g.

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used.

FEC FORM 3X (3-80)

85040501630

DETAILED SUMMARY PAGE
of Receipts and Disbursements
(Page 2, FEC FORM 3X)

Name of Committee (in Full)	Report Covering the Period		
IDAHO DELEGATES FOR MONDALE	From: 4/1/84	To: 6/30/84	
	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date	
I. RECEIPTS			
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees	365.00	365.00	11(a)
(Memo Entry Unitemized $ 365.00)			
(b) Political Party Committees			11(b)
(c) Other Political Committees			11(c)
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c))	365.00	365.00	11(d)
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES			12
13. ALL LOANS RECEIVED			13
14. LOAN REPAYMENTS RECEIVED			14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)			15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			16
17. OTHER RECEIPTS (Dividends, Interest, etc.)			17
18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)	365.00	365.00	18
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES	330.91	330.91	19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES			20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			21
22. INDEPENDENT EXPENDITURES (use Schedule E)			22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. §441 a(d)) (Use Schedule F)			23
24. LOAN REPAYMENTS MADE			24
25. LOANS MADE			25
26. REFUNDS OF CONTRIBUTIONS TO			
(a) Individuals/Persons Other Than Political Committees			26(a)
(b) Political Party Committees			26(b)
(c) Other Political Committees			26(c)
(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))			26(d)
27. OTHER DISBURSEMENTS			27
28. TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	330.91	330.91	28
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)	365.00	365.00	29
30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)	--	--	30
31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)	365.00	365.00	31
32. TOTAL OPERATING EXPENDITURES from Line 19	330.91	330.91	32
33. OFFSETS TO OPERATING EXPENDITURES from Line 15	--	--	33
34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)	330.91	330.91	34

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SCHEDULE A **ITEMIZED RECEIPTS**

Page 1 of 9 for LINE NUMBER 11A
(Use separate schedule(s) for each category of the Detailed Summary Page)

Any information copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)
IDAHO DELEGATES FOR MONDALE

A. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Date (month, day, year)	Amount of Each Receipt this Period
Walter L. Jones 2805 Annett Boise, Idaho 83705		4/18/84	$5.00
Receipt For: [X] Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—$ 5.00		
B. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Date (month, day, year)	Amount of Each Receipt This Period
Dennis Hall 1432 Dundee Boise, Idaho 83705		4/18/84	$5.00
Receipt For: XX Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—$ 5.00		
C. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Date (month, day, year)	Amount of Each Receipt This Period
Raymond Friend 4424 Albion Boise, Idaho 83705		4/18/84	$5.00
Receipt For: XX Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—$ 5.00		
D. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Date (month, day, year)	Amount of Each Receipt This Period
Mary Ann Olson 1472 Storey Meridian, Idaho 83642		4/18/84	$5.00
Receipt For: XX Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—$5.00		
E. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Date (month, day, year)	Amount of Each Receipt This Period
Sam Greer 2417-1/2 Ellis St. Boise, Idaho 83702		4/18/84	$5.00
Receipt For: XX Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—$ 5.00		
F. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Date (month, day, year)	Amount of Each Receipt This Period
Red DeMeyer 11410 Southview Court Boise, Idaho 83709		4/18/84	$5.00
Receipt For: XX Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—$5.00		
G. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Date (month, day, year)	Amount of Each Receipt This Period
Wayne Larsen 1106 Longmont Boise, Idaho 83706		4/18/84	$5.00
Receipt For: XX Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—$5.00		
SUBTOTAL of Receipts This Page (optional)			
TOTAL This Period (last page this line number only)			

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SCHEDULE A **ITEMIZED RECEIPTS**

(Use separate schedule(s) for each category of the Detailed Summary Page)

Any information copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)

IDAHO DELEGATES FOR MONDALE

A. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Date (month, day, year)	Amount of Each Receipt this Period
Mike Stanton Box 654 Weiser, Idaho 83652		4/18/84	$5.00
Receipt For: XX Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—$ 5.00		
B. Full Name, Mailing Address and ZIP Code	**Name of Employer / Occupation**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
Janet Rice 2619 Palouse Boise, Idaho 83705		4/18/84	$5.00
Receipt For: XX Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—$ 5.00		
C. Full Name, Mailing Address and ZIP Code	**Name of Employer / Occupation**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
Gaylord Coonse 2250 Dorothy Avenue Boise, Idaho 83705		4/18/84	$5.00
Receipt For: XX Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—$ 5.00		
D. Full Name, Mailing Address and ZIP Code	**Name of Employer / Occupation**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
Ron Briscoe 10710 Onondaga Boise, Idaho 83709		4/18/84	$10.00
Receipt For: XX Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—$ 10.00		
E. Full Name, Mailing Address and ZIP Code	**Name of Employer / Occupation**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
Bill Dixon Rt. 4, Box 10 Blackfoot, Idhao 83221		4/18/84	$5.00
Receipt For: XX Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—$ 5.00		
F. Full Name, Mailing Address and ZIP Code	**Name of Employer / Occupation**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
Larry Dollinger Rt. 1, Box 101 Rigby, Idaho 83442		4/18/84	$5.00
Receipt For: XX Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—$ 5.00		
G. Full Name, Mailing Address and ZIP Code	**Name of Employer / Occupation**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
Ed Kobe 2064 Crystal Way Boise, Idaho 83706		4/18/84	$5.00
Receipt For: XX Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—$ 5.00		
SUBTOTAL of Receipts This Page (optional)			
TOTAL This Period (last page this line number only)			

8504016333

SCHEDULE A **ITEMIZED RECEIPTS**

Any information copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)
IDAHO DELEGATES FOR MONDALE

A. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation / Aggregate Year-to-Date	Date (month, day, year)	Amount of Each Receipt this Period
Michael Brush Statehouse Boise, Idaho 83720 Receipt For: X Primary ☐ General ☐ Other (specify):	Occupation Aggregate Year-to-Date–$ 10.00	4/18/84	$10.00
B. Full Name, Mailing Address and ZIP Code	**Name of Employer / Occupation / Aggregate Year-to-Date**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
Gerald Geddes 2525 Hayden Way Boise, Idaho 83705 Receipt For: XX Primary ☐ General ☐ Other (specify):	Occupation Aggregate Year-to-Date–$ 5.00	4/18/84	$5.00
C. Full Name, Mailing Address and ZIP Code	**Name of Employer / Occupation / Aggregate Year-to-Date**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
Peggy Shurtliff 62 Horizon Drive Boise, Idaho 83702 Receipt For: XX Primary ☐ General ☐ Other (specify):	Occupation Aggregate Year-to-Date–$ 5.00	4/18/84	$5.00
D. Full Name, Mailing Address and ZIP Code	**Name of Employer / Occupation / Aggregate Year-to-Date**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
Marilyn Heath 1405-1/2 W. Fort St. Boise, Idaho 83702 Receipt For: X Primary ☐ General ☐ Other (specify):	Occupation Aggregate Year-to-Date–$ 5.00	4/18/84	$5.00
E. Full Name, Mailing Address and ZIP Code	**Name of Employer / Occupation / Aggregate Year-to-Date**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
James Kerns 1612 N. 23rd SD. Boise, Idaho 83702 Receipt For: X Primary ☐ General ☐ Other (specify):	Occupation Aggregate Year-to-Date–$ 30.00	4/18/84	$30.00
F. Full Name, Mailing Address and ZIP Code	**Name of Employer / Occupation / Aggregate Year-to-Date**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
Donald Tims 1606 N. 16th St. Boise, Idhao 83702 Receipt For: X Primary ☐ General ☐ Other (specify):	Occupation Aggregate Year-to-Date–$ 5.00	4/18/84	$5.00
G. Full Name, Mailing Address and ZIP Code	**Name of Employer / Occupation / Aggregate Year-to-Date**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
Randy Robertson 1605 SM Lennox Casper Wyoming 82601 Receipt For: XX Primary ☐ General ☐ Other (specify):	Occupation Aggregate Year-to-Date–$ 5.00	4/18/84	$5.00
SUBTOTAL of Receipts This Page (optional)			
TOTAL This Period (last page this line number only)			

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SCHEDULE A **ITEMIZED RECEIPTS**

Page 4 of 9 for LINE NUMBER 11A
(Use separate schedule(s) for each category of the Detailed Summary Page)

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Name of Committee (in Full)
IDAHO DELEGATES FOR MONDALE

A. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation / Aggregate Year-to-Date	Date (month, day, year)	Amount of Each Receipt this Period
Lonnie Upshaw 610 S. Cole Rd. Boise, Idaho 83709	Occupation	4/18/84	$5.00
Receipt For: X Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date–$ 5.00		
B. Full Name, Mailing Address and ZIP Code	**Name of Employer / Occupation / Aggregate Year-to-Date**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
Max McGregory 2017 N. Illinois Caldwell, Idaho 83605	Occupation	4/18/84	$5.00
Receipt For: X Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date–$ 5.00		
C. Full Name, Mailing Address and ZIP Code	**Name of Employer / Occupation / Aggregate Year-to-Date**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
Ken Corlson 1115 N.E. 200th Seattle, Washington 98125	Occupation	4/18/84	$5.00
Receipt For: X Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date–$ 5.00		
D. Full Name, Mailing Address and ZIP Code	**Name of Employer / Occupation / Aggregate Year-to-Date**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
Ronald Green 1053 Howard St. Pocatello, Idhao 83201	Occupation	4/18/84	$5.00
Receipt For: X Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date–$ 5.00		
E. Full Name, Mailing Address and ZIP Code	**Name of Employer / Occupation / Aggregate Year-to-Date**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
Fred Fridley Rt. 1, Box 53 Lapwai, Idaho 83540	Occupation	4/18/84	$5.00
Receipt For: X Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date–$ 5.00		
F. Full Name, Mailing Address and ZIP Code	**Name of Employer / Occupation / Aggregate Year-to-Date**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
Cliff Wilson Rt. 2, Box 148C Harrison, Idaho 83833	Occupation	4/18/84	$5.00
Receipt For: X Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date–$ 5.00		
G. Full Name, Mailing Address and ZIP Code	**Name of Employer / Occupation / Aggregate Year-to-Date**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
Jerry Stephenson E. 11015 - 27th Spokane, Washington 99206	Occupation	4/18/84	$5.00
Receipt For: X Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date–$ 5.00		

SUBTOTAL of Receipts This Page (optional)	
TOTAL This Period (last page this line number only)	

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SCHEDULE A **ITEMIZED RECEIPTS**

Page 5 of 9 for
LINE NUMBER 11A
(Use separate schedule(s) for each category of the Detailed Summary Page)

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Name of Committee (in Full)
IDAHO DELEGATES FOR MONDALE

A. Full Name, Mailing Address and ZIP Code Bob McKinley 2518-2 Honey Road Kennivick, Washington Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date–$ 5.00	Date (month, day, year) 4/18/84	Amount of Each Receipt this Period $5.00
B. Full Name, Mailing Address and ZIP Code Tom Genther 7157 Chilcote Drive Boise, Idhao 83709 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date–$ 5.00	Date (month, day, year) 4/18/84	Amount of Each Receipt This Period $5.00
C. Full Name, Mailing Address and ZIP Code Jim Hawkins 215 S. 21st St, Coeur d'Alene, Idaho 83814 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date–$ 5.00	Date (month, day, year) 4/18/84	Amount of Each Receipt This Period $5.00
D. Full Name, Mailing Address and ZIP Code Ralph Farley 949 Willow Lane Pocatello, Idaho 83201 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date–$ 5.00	Date (month, day, year) 4/18/84	Amount of Each Receipt This Period $5.00
E. Full Name, Mailing Address and ZIP Code Richard Howard 72 Howard Pocatello, Idaho 83204 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date–$ 5.00	Date (month, day, year) 4/18/84	Amount of Each Receipt This Period $5.00
F. Full Name, Mailing Address and ZIP Code Joy L. Moore 2917 N. Fry St. Boise, Idaho 83704 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date–$ 5.00	Date (month, day, year) 4/18/84	Amount of Each Receipt This Period $5.00
G. Full Name, Mailing Address and ZIP Code Charles Barnes N. 8511 Greenwood St. Spokane, Washington 89208 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date–$ 5.00	Date (month, day, year) 4/18/84	Amount of Each Receipt This Period $5.00
SUBTOTAL of Receipts This Page (optional)			
TOTAL This Period (last page this line number only)			

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SCHEDULE A **ITEMIZED RECEIPTS**

Page 6 of 9 for LINE NUMBER 11A
(Use separate schedule(s) for each category of the Detailed Summary Page)

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Name of Committee (in Full)
IDAHO DELEGATES FOR MONDALE

A. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Date (month, day, year)	Amount of Each Receipt this Period
Steve Hamond 6095 Elsie Circle Lennion, Utah 84123		4/18/84	$5.00
Receipt For: XX Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date-$ 5.00		

B. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Date (month, day, year)	Amount of Each Receipt This Period
Clifford Green 551 N. Main Winford, Utah 84320		4/18/84	$5.00
Receipt For: XX Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date-$ 5.00		

C. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Date (month, day, year)	Amount of Each Receipt This Period
Clifford Martinez 9972 Fox Ridge Dr. Boise, Idaho 83709		4/18/84	$5.00
Receipt For: XX Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date-$ 5.00		

D. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Date (month, day, year)	Amount of Each Receipt This Period
Jake Gier 2008 Esten Boise, Id. 83703		4/18/84	$5.00
Receipt For: XX Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date-$ 5.00		

E. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Date (month, day, year)	Amount of Each Receipt This Period
Ted V. Pino 26 Wallace Boise, Id. 83705		4/18/84	$5.00
Receipt For: XX Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date-$ 5.00		

F. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Date (month, day, year)	Amount of Each Receipt This Period
Ernest Paine 1805 N. 11th St. Boise, Idaho 83702		4/18/84	$5.00
Receipt For: XX Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date-$ 5.00		

G. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Date (month, day, year)	Amount of Each Receipt This Period
William Beeler 7302 Gardner Lane Boise, Idaho 83703		4/18/84	$5.00
Receipt For: XX Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date-$ 5.00		

SUBTOTAL of Receipts This Page (optional)	
TOTAL This Period (last page this line number only)	

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SCHEDULE A

ITEMIZED RECEIPTS

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Name of Committee (in Full)

IDAHO DELEGATES FOR MONDALE

A. Full Name, Mailing Address and ZIP Code Don Standenmeier 5624 Collister Boise, Idaho 83703 Receipt For: XX Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$5.00	Date (month, day, year) 4/18/84	Amount of Each Receipt this Period $5.00
C. Full Name, Mailing Address and ZIP Code Robert Kinghorn 1232 W. Eldridge Pocatello, Idaho 83201 Receipt For: X Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$5.00	Date (month, day, year) 4/18/84	Amount of Each Receipt This Period $5.00
C. Full Name, Mailing Address and ZIP Code Larry Blakeslee 9267 Teakwood Dr. Boise, Idaho 83709 Receipt For: X Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$5.00	Date (month, day, year) 4/18/84	Amount of Each Receipt This Period $5.00
D. Full Name, Mailing Address and ZIP Code Jon Wlaters Rt. 7, Box 294 Blackfoot, Idaho 83221 Receipt For: XX Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$5.00	Date (month, day, year) 4/18/84	Amount of Each Receipt This Period $5.00
E. Full Name, Mailing Address and ZIP Code Lloyd Miller 414 E. 22nd St. Idaho Falls, Idaho 83401 Receipt For: XX Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$5.00	Date (month, day, year) 4/18/84	Amount of Each Receipt This Period $5.00
F. Full Name, Mailing Address and ZIP Code John S. Chapman 2214 Roanoke Boise, Idaho 83712 Receipt For: XX Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$10.00	Date (month, day, year) 4/18/84	Amount of Each Receipt This Period $10.00
G. Full Name, Mailing Address and ZIP Code Karole Foruria 638 Meadow Dr. Emmett, Idaho 83617 Receipt For: XX Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$10.00	Date (month, day, year) 4/18/84	Amount of Each Receipt This Period $10.00
SUBTOTAL of Receipts This Page (optional)			
TOTAL This Period (last page this line number only)			

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SCHEDULE A — ITEMIZED RECEIPTS

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Name of Committee (in Full)
IDAHO DELEGATES FOR MONDALE

A. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation / Aggregate Year-to-Date	Date (month, day, year)	Amount of Each Receipt this Period
Gary Gould 317 W. Main St. Boise, Idaho 83720 Receipt For: XX Primary ☐ General ☐ Other (specify):	Occupation Aggregate Year-to-Date $ 10.00	4/18/84	$10.00
B. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation / Aggregate Year-to-Date	Date (month, day, year)	Amount of Each Receipt This Period
Steven Eames 317 W. Main St. Boise, Idaho 83702 Receipt For: X Primary ☐ General ☐ Other (specify):	Occupation Aggregate Year-to-Date $ 5.00	4/18/84	$5.00
C. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation / Aggregate Year-to-Date	Date (month, day, year)	Amount of Each Receipt This Period
William H. Dunn Rt. 2, Box 18 Harrison, Idaho 83833 Receipt For: X Primary ☐ General ☐ Other (specify):	Occupation Aggregate Year-to-Date $ 5.00	4/18/84	$5.00
D. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation / Aggregate Year-to-Date	Date (month, day, year)	Amount of Each Receipt This Period
Ann Shepard 2918 Burton Boise, Idaho 83704 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation Aggregate Year-to-Date $ 5.00	4/18/84	$5.00
E. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation / Aggregate Year-to-Date	Date (month, day, year)	Amount of Each Receipt This Period
Bud Alloway 11650 Seneca Boise, Idaho 83709 Receipt For: XX Primary ☐ General ☐ Other (specify):	Occupation Aggregate Year-to-Date $ 5.00	4/18/84	$5.00
F. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation / Aggregate Year-to-Date	Date (month, day, year)	Amount of Each Receipt This Period
Walter Butler 911 Heron Boise, Idaho 83703 Receipt For: XX Primary ☐ General ☐ Other (specify):	Occupation Aggregate Year-to-Date $ 5.00	4/18/84	$5.00
G. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation / Aggregate Year-to-Date	Date (month, day, year)	Amount of Each Receipt This Period
Michael Ellard 4505 Cassia St. Boise, Idaho 83702 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation Aggregate Year-to-Date $ 5.00	4/18/84	$5.00

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only)

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SCHEDULE A — ITEMIZED RECEIPTS

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Name of Committee (in Full)
IDAHO DELEGATES FOR MONDALE

Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation	Date (month, day, year)	Amount of Each Receipt this Period
A. Warren K. Lundquist P.O. Box 206 Boise, Idaho 83701 Receipt For: X Primary ☐ General ☐ Other (specify):	Occupation Aggregate Year-to-Date–$ 5.00	4/27/84	$5.00
B. Donna R. Stover 3435 N. 33rd St. Boise, Idaho 83703 Receipt For: X Primary ☐ General ☐ Other (specify):	Occupation Aggregate Year-to-Date–$ 5.00	4/19/84	$5.00
C. M. Karl Shurtliff 62 Horizon Dr. Boise, Idaho 83702 Receipt For: X Primary ☐ General ☐ Other (specify):	Occupation Aggregate Year-to-Date–$ 25.00	3/28/84	$25.00
D. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date–$	Date (month, day, year)	Amount of Each Receipt This Period
E. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date–$	Date (month, day, year)	Amount of Each Receipt This Period
F. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date–$	Date (month, day, year)	Amount of Each Receipt This Period
G. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date–$	Date (month, day, year)	Amount of Each Receipt This Period

SUBTOTAL of Receipts This Page (optional) . . . . . .

TOTAL This Period (last page this line number only) . . . . . .

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SCHEDULE B **ITEMIZED DISBURSEMENTS**

Page 1 of 1 for LINE NUMBER 19
(Use separate schedule(s) for each category of the Detailed Summary Page)

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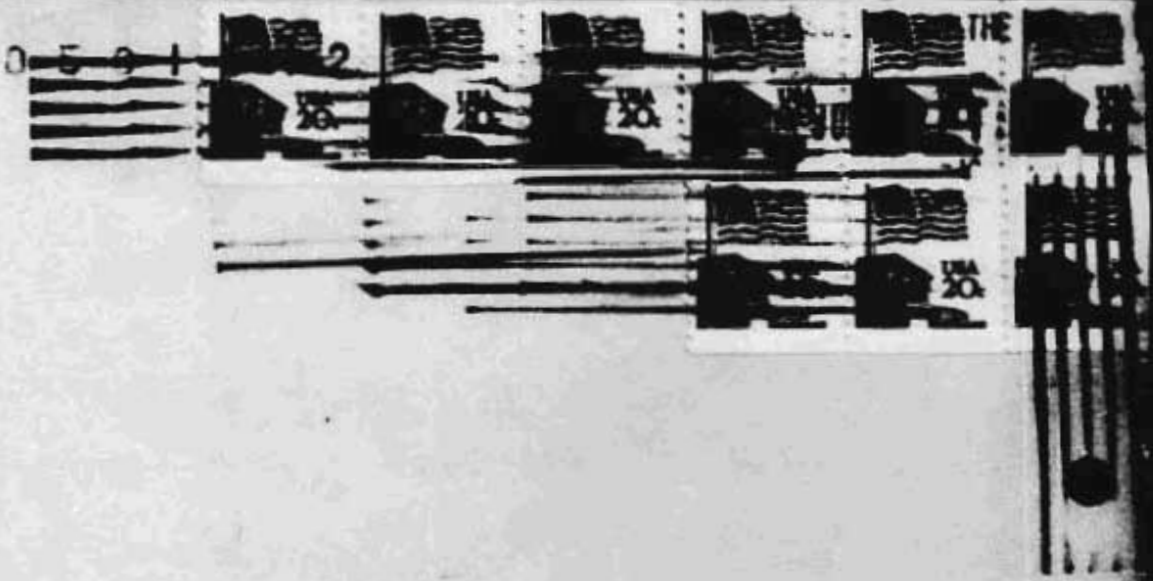
Name of Committee (In Full)

IDAHO DELEGATES FOR MONDALE

	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Full Name, Mailing Address and ZIP Code Idaho Democratic Central Committee 1020 W. Franklin Boise, Idaho 83702	mailing list Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/25/84	$119.47
B. Full Name, Mailing Address and ZIP Code Kinko's Copies 675 S. Capitol Blvd. Boise, Idaho 83706	copies Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/26/84	$28.32
C. Full Name, Mailing Address and ZIP Code U.S. Post Office Main Office, 13th Street Boise, Idaho 83701	permit fee postage Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/19/84 4/28/84	$80.00 $71.12
D. Full Name, Mailing Address and ZIP Code U.S. Post Office	postage Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	5/1/84	$32.00
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			$330.91

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850405-91



Larry La Rocco
Idaho Delegates for Mondale
P O Box 2215
Boise, Idaho 83701

Mr. Lawrence M. Noble
Deputy General Counsel
Federal Election Commission
Washington, D.C. 20463

Att: Stephen Mims

CERTIFIED
P 657 562 750
MAIL

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Larry Laroco, Treasurer
Idaho Delegates For Mondale
537 W. Bannock
Suite 201
Boise, ID 83702

Re: MUR 1667

8504050016 43

Dear Mr. Laroco:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against the committee and you, as treasurer, in connection with this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you intend to be represented by counsel in this matter please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

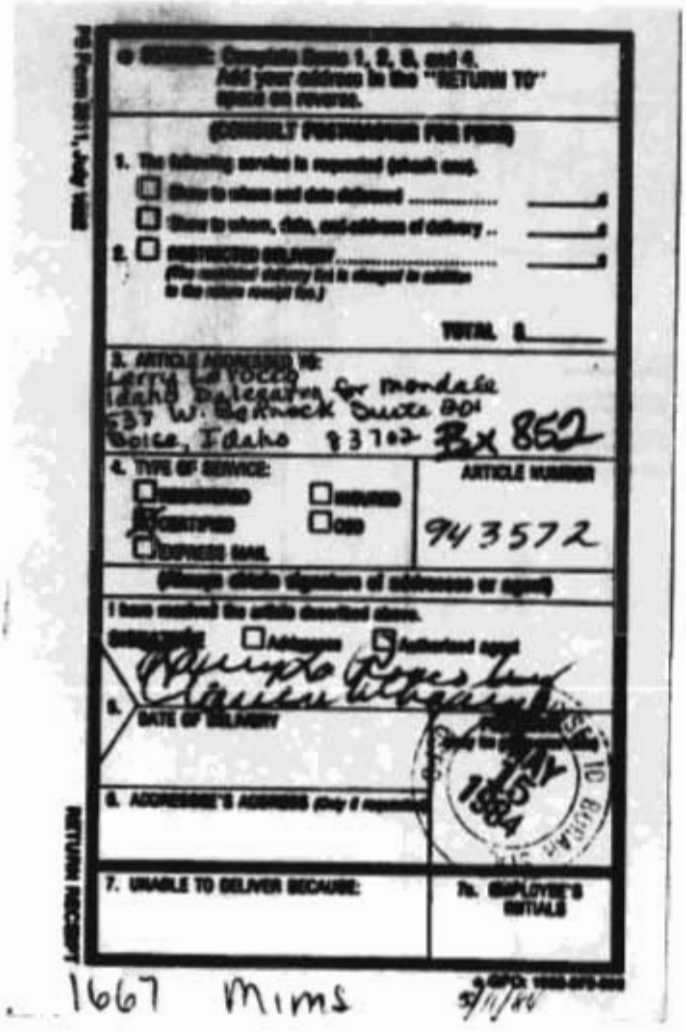
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

Enclosures
1. Complaint
2. Procedures
3. Designation of Counsel Statement



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LAW OFFICES

GREENBERG, TRAURIG, ASKEW, HOFFMAN, LIPOFF, ROSEN & QUENTEL

LINDA KOOBRICK ADLER
MICHAEL D. ALBERTINE
CESAR L. ALVAREZ
RUDOLPH F. ARAGON
RICHARD A. ARKIN
REUBIN O'D ASKEW
JAMES L. BACCHUS
HILARIE BASS
NORMAN J. BENFORD
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STEVEN M. GOLDSMITH
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STEVEN A. LANDY
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ALAN S. LEDERMAN
LAWRENCE S. LEVY
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GARY D. LIPSON
CARLOS E. LOUMIET
JUAN P. LOUMIET
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VICTOR H. POLK, JR.
ALBERT G. QUENTEL
NICHOLAS ROCKWELL
MARVIN S. ROSEN
DAVID L. ROSS
DAVID P. ROWE
ROBERT H. RUBENSTEIN
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MARK SCHWIMMER
MARTIN B. SHAPIRO
MARLENE K. SILVERMAN
STUART H. SINGER
TIMOTHY A. SMITH
DANIEL A. SUCHMAN
HERBERT M. SUSKIN
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WRITER'S DIRECT NO.

FEDERAL EXPRESS

June 25, 1984

8504016045

Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20005

Re: Complaint of the National Right to Work Committee, et al v. Walter F. Mondale and Mondale for President Campaign Committee, et al, MUR-1704

Dear Commissioners:

Please accept the enclosed Affidavits as a supplemental filing to the response that was filed on behalf of certain Florida delegate committees in the above-referenced matter.

Very truly yours,

STUART H. SINGER

SHS/ch
Enc.

BEFORE THE
FEDERAL ELECTION COMMISSION

NATIONAL RIGHT TO WORK COMMITTEE and RALPH MARTIN HETTINGA, JR., Complainants, v. WALTER F. MONDALE and MONDALE FOR PRESIDENT CAMPAIGN COMMITTEE, et al., Respondents.	MUR 1704 **AFFIDAVIT OF ROBERT A. SUGARMAN**

STATE OF FLORIDA)
) SS:
COUNTY OF DADE)

BEFORE ME, the undersigned authority, personally appeared, ROBERT A. SUGARMAN, who, after first being duly sworn, deposes and says that:

1. I am treasurer of the South Florida Delegates for Mondale Committee.

2. That the South Florida Delegates for Mondale Committee was formed and has been operated independent of the Mondale for President Committee and of other delegate committees supporting the candidacy of Mr. Mondale.

3. That upon formation, the South Florida Delegates for Mondale Committee timely registered with the Federal Election Commission pursuant to 11 C.F.R. part 102 and 2 U.S.C. §433, and thereafter complied with 11 C.F.R. part 104 and 2 U.S.C. §434 with respect to reporting contributions and expenditures.

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4. That the only assistance provided by the Mondale campaign staff in the formation of the delegate committees is a memorandum provided by the Mondale for President Committee describing the laws and Commission regulations governing the primary election process to insure that all committees were in strict compliance with these regulations.

5. That the South Florida Delegates for Mondale Committee has not accepted any contributions from union political action committees or from any other contributors in excess of the $5,000.00 contribution limit established by the Federal Election Campaign Act.

6. That the South Florida Delegates for Mondale Committee was not at any time subject to control of the Mondale for President Committee or the Mondale Presidential Campaign with respect to any of its operations, including the contents of its campaign materials or the Committees' decisions regarding contributions.

7. That the South Florida Delegates for Mondale Committee has never hired a Mondale campaign worker who has been laid off.

8. That the South Florida Delegates for Mondale Committee has never contributed any money to the Mondale for President Committee or to any other delegate committees.

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9. That the South Florida Delegates for Mondale Committee has not at any time accepted contributions from sources prohibited under the Federal Election Campaign Act or the regulations promulgated thereunder.

10. That the South Florida Delegates for Mondale Committee has acted in full compliance with the Federal Election Campaign Act, the regulations of Federal Election Commission and has remained an independent organization unaffiliated with the Mondale for President Committee or with other delegate committees supporting Walter Mondale.

11. That the statements made herein are true and correct to the best of my knowledge.

FURTHER AFFIANT SAYETH NAUGHT.

Robert A. Sugarman
ROBERT A. SUGARMAN

SWORN TO AND SUBSCRIBED before me this 22nd day of June, 1984.

Connie White
NOTARY PUBLIC
State of Florida at Large

My Commission Expires:

Notary Public, State of Florida at Large
My Commission Expires: April 21, 1987
Bonded thru Maynard Bonding Agency

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LAW OFFICES

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JUAN P. LOUMIET
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FEC
#3728

June 19, 1984

8504016049

Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20005

Re: Complaint of the National Right to Work Committee, et al. v. Walter F. Mondale and Mondale For President Campaign Committee, et al., MUR 1704

Dear Commissioners:

This response is filed on behalf of Florida Delegate Committees which support the candidacy of Walter Mondale in the Fourth, Fifth, Eighth, Ninth, Northern Twelfth, Thirteenth and Fourteenth Congressional Districts and the South Florida Delegates for Mondale Committee and is being filed in opposition to the above-referenced complaint of the National Right to Work Committee and Ralph Martin Hettinga, Jr. filed on May 21, 1984. In its complaint, the National Right To Work Committee ("NRWC") asserts that a number of union-related political action committees have

evaded the contribution limits of the Federal Election Campaign Act by making contributions to delegate committees which NRWWC assets are affiliated with one another and with the Mondale for President Committee ("MPC"). The complainant requests that the Commission hold the independent Mondale delegate committees throughout the country, along with the MPC, to a single common contribution limitation.

For the reasons set forth below, we submit that the allegations presented by the complainant do not warrant further investigation by the Commission. Initially, we would urge the Commission to require a "high threshold" of proof before commencing such an investigation. Investigations of allegedly improper campaign activities, once launched, attract considerable public attention, notwithstanding the confidentiality provisions of the Federal Election Campaign Act, and may impact upon the presidential campaign itself. Indeed, creating such publicity may be a prime purpose behind the filing of this Complaint. Moreover, such investigations may infringe upon or "chill" the exercise of political expression and associational rights by grass roots groups such as the Florida delegate committees by enmeshing the committees in often protracted, costly and burdensome proceedings. Unless such investigations are carefully limited, they may hinder the very type of local volunteer activity which the Chair-

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man of the Commission has characterized as "the essence of healthy election campaigning," Federal Election Campaign Act Amendments of 1979, "Hearings before the Senate Committee on Rules and Administration," 96th Congress, 1st Sess. at 8 (1979), and which Congress has sought to encourage in enacting the coattails provisions of the Federal Election Campaign Act Amendments of 1979. 2 U.S.C. §431(8)(b)(i).[1/] The Commission has also acted to facilitate in the delegate selection process similar campaign activity to that encouraged in the general election by the statutory coattails provision. See FEC Explanation and Justification, 1 Federal Election Campaign Finance Guide (CCH), ¶ 864 at 1561-1567. The Commission's objective would be undermined if full scale investigations are undertaken upon such wide ranging and unconfirmed accusations of affiliation as those made in the NRWC Complaint. Although the Commission has not articulated the level of cause which must exist before proceeding to a formal investigation, at least in the context of grass roots campaign activity, the burden of proof upon a complainant should be substantial.

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1/ Under these provisions, candidates for public office, including presidential candidates, may coordinate grass roots campaigning without violating the Act.

I. THE FEDERAL ELECTION CAMPAIGN ACT DOES NOT PROHIBIT "AFFILIATION" AMONG COMMITTEES RECEIVING CONTRIBUTIONS.

The NRWC Complaint is predicated on 2 U.S.C. § 441a(a)(5), which states that all contributions made by political committees "established, financed, maintained, or controlled by [the same] person" shall be considered to have been made by a single political committee. NRWC, however, is not alleging affiliation among the contributing sources but rather among the recipient delegate committees. Neither 2 U.S.C. § 441a(a)(5), nor any other provision of the Act authorizes the Commission to treat contributions made to delegate committees as contributions made to the candidate. That the Commission should not assume such authority is implicit from § 441a(a)(7)(A) which states only that contributions made to a political committee "authorized by such candidate to accept contributions on his behalf" shall be considered as contributions made to the candidate. If Congress had intended to consider other contributions -- such as those involved here -- as contributions to the candidate, it would have so legislated.

This interpretation is supported by § 441a(a)(5)(A) which states that the "affiliation" provisions of that section do not limit "transfers between political committees of funds raised through joint fund raising efforts." Moreover, § 441a(a)(4) stipulates that the limitations on contributions "do not apply to transfers between and among political committees which are

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national, state, district or local committees (including any subordinate committee thereof) of the same political party," although clearly the activities of such committees are closely coordinated. The Supreme Court gave related provisions of the Act, allowing such transfers for Senatorial campaigns, an expansive interpretation in upholding the Commission's interpretation in Federal Election Comm. v. Democratic Senatorial Campaign Committee, 454 U.S. 27 (1981).

Not only did Congress not authorize the Commission to take the action complainant requests, but there is an obvious reason why delegate committees should not be subject to single contribution limits. Unless the committees do in fact coordinate their actions and exchange records, there is no way one delegate committee can determine whether a given contribution tendered to it violates the Act's contribution limits.

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II. FLORIDA DELEGATE COMMITTEES ARE NOT AFFILIATED WITH EACH OTHER OR WITH THE MONDALE FOR PRESIDENT COMMITTEE.

Florida delegate committees filing this response are independently established autonomous committees who are not affiliated either with other committees operating throughout the state and nation or with the MPC. Thus, even if the standards for affiliation for the purpose of the Act's contribution limitations set forth at 2 U.S.C. § 441a(a)(5) are relevant to this com-

plaint, the Florida delegate committees have not been so affiliated. The Commission has interpreted the general statutory standards set forth in § 441a(a)(5) by prescribing five factors to be used in determining whether committees are affiliated 11 C.F.R. § 100.5(g)(2)(ii): (1) ownership by one committee of a controlling interest in voting shares or securities in another committee; (2) provisions of by-laws, constitutions or other documents by which one committee has the authority, power or ability to direct another committee; (3) the authority, power or ability of one committee to hire, appoint, discipline, discharge, demote or remove or otherwise influence the decision of the officer or members of the other committees; (4) similar patterns of contributions by the committees in questions; and (5) the transfer of funds between committees which represent a substantial portion of the funds of the committees in question.

The allegations in the NRWC Complaint, even if accepted on their face, do not satisfy the Commission's affiliation criteria. Moreover, the Florida delegate committees on whose behalf this response is filed are not specifically mentioned by the allegations concerning affiliation. Until the complainant establishes that the affiliation standards have been met, there is no reason for a formal investigation. As documented by the attached

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affidavits,[2] the Florida delegate committees filing this response were established by delegates independently of the MPC. The formation of the committees, appointment of treasurers, the choice of a committee name, opening of a bank account and other actions were all performed independently by each committee. The delegate committees financed their operations through fund raisers and other means and controlled their own activities. The MPC enjoyed no control over the members of the committee.

Relying on various news accounts,[3] the complaint asserts that the national Modale staff "instructed" delegate committees on how to organize and operate, that Mondale staff were transfer-

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2/ Supporting affidavits on behalf of other committees will be forwarded as soon as possible as a supplemental filing to this response.

3/ For the most part, the news accounts relied upon in the complaint failed to meet the Commission's policy with regard to the opening of compliance actions on the basis of newspaper accounts. See Commission Memorandum No. 663 November 15, 1979. That policy requires a news account to be well documented, substantial, and to meet all of the requirements of a complaint in order to constitute a sufficient basis for an enforcement action. The news accounts relied upon in the NWRC complaint do not meet this standard. They are based on speculative and conclusory quotes which do not set forth a substantive statement of facts. For this reason, the allegations concerning the affiliation of delegate committees with each other and with the MPC based on newspaper articles do not create a sufficient basis for further investigation.

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red to the delegate committees, that committees declined PAC contributions at Mr. Mondale's request, that the MPC's office of legal counsel was made available to advise delegate committees, that funds were transferred from a delegate committee in one state to a sister group in another, that certain registration statements for different committees were purportedly written by the same person and mailed in envelopes typed on the same typewriter and reported joint spending at the same print shops, and that delegate committees started disbanding after Walter Mondale requested them to do so. Each of these allegations is addressed below, and the response to these allegations is supported by sworn affidavits from the delegate committee treasurers.

1. The only assistance provided by the Mondale staff in the formation of the delegate committees filing this response was a memorandum provided by the MPC describing the laws and commission regulations governing the primary election process to insure that all committees were in strict compliance with these regulations. The provision of such legal assistance is expressly authorized by 2 U.S.C. § 431(8)(B)(ix).

2. The Florida delegate committees represented herein have not hired any MPC campaign workers.

3. Mr. Mondale's decision to request delegate committees supporting his candidacy not to accept PAC contributions hardly

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can be the basis for a finding of an affiliation among the committees and the MPC. In the first place, there is nothing whatever to suggest that the committees followed Mr. Mondale's direction in this regard. In Florida, at least, the primary had already been conducted at this time and contributions from any source, including political action committees, were no longer needed. A committee's decision not to accept further contributions hardly demonstrates that the delegate committees actions were being orchestrated by Mr. Mondale or the MPC. To the contrary, the delegate committees' earlier decisions to accept limited contributions from political action committee sources while Mr. Mondale had decided not to accept such contributions for the purposes of his own campaign illustrates the independence of decisionmaking between the MPC and the delegate committees.

4. The availability of legal advice to the delegate committees is not a basis on which affiliation may be found. Indeed, even the provision of legal advice regarding Commission regulations is not a basis upon which the Commission may find the delegate committees to have affiliated themselves with the national campaign. See 2 U.S.C. § 431(8)(B)(ix).

5. The delegate committees represented in this response have not contributed any money to the MPC or to any other delegate committees.

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6. The allegations concerning the use of a similar typewriter or printer, even if true, hardly support a finding of affiliation as set forth under the Commission's regulations.

7. The fact that some delegate committees disbanded after the purpose for which they were created -- the primary elections -- concluded is hardly surprising and is not indicative of any affiliation among the committees or affiliation with the national campaign.

In sum, the alleged coordination and control of the delegate committees by the Mondale campaign has not been established, at least with respect to the Florida delegate committees filing this response. Furthermore, the private investigatory reports discussed on page 6 of the complaint do not identify any of the Florida delegate committees filing this response as having been involved in any allegedly "affiliated" activity. For these reasons, there is no basis for concluding that the Mondale delegate committees are affiliates of the Mondale campaign and share a single limit on contributions that they may receive from any one source for the election.

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III. COMMISSION INTERPRETATIONS SHOULD BE INTERPRETED IN LIGHT OF THE DELEGATES' CONSTITUTIONAL RIGHTS TO POLITICAL ASSOCIATION THROUGH COMMITTEES.

The FEC is being asked to investigate committee activities which are fully subject to First Amendment protection. The organization of groups to participate in the political process lies at the core of the First Amendment rights of expression and association. As Chief Justice Burger stated for the Supreme Court in Citizens Against Rent Control v. City of Berkeley, 454 U.S. 290, 294 (1982):

> "[T]he practice of persons sharing common views banning together to achieve a common end is deeply embedded in the American political process. . . . The tradition of volunteer committees for collective action has manifested itself in myriad community and public activities; in the political process, it can focus on a candidate or on a ballot measure. Its value is that by collective effort, individuals can make their views known when, individually, their voices would be faint or lost."

Any interpretation of Commission regulations, or for that matter, any direct regulation either by this Commission or even by the Congress which infringed on the rights of individual delegates to campaign together through delegate committees would be constitutionally suspect:

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> Effective advocacy of both public and private points of view, particularly controversial ones, is undeniably enhanced by group association, as this Court has more than once recognized by remarking upon the close nexus between the freedoms of speech and assembly.

NAACP v. Alabama, 357 U.S. 449, 460 (1958); Buckley v. Valeo, 424 U.S. 1, 14 (1976); Citizens Against Rent Control v. City of Berkeley, 454 U.S. at 294; Federal Election Commission v. Florida for Kennedy Committee, 681 F.2d 1281, 1284-1285 (11th Cir. 1982). In Buckley v. Valeo, the Supreme Court made clear that:

> "The First Amendment protects political association, as well as political expression. The constitutional right of association explicated in NAACP v. Alabama, 357 U.S. 449 (1958), stems from the Court's recognition that "effective advocacy of both public and private points of view, particularly controversial ones, is undeniably enhanced by group association.' Subsequent decisions have made clear that the First and Fourteenth Amendments guarantee 'freedom to associate with others for the common advancement of political beliefs and ideas,' a freedom that encompasses 'the right to associate with the political party of one's choice.' Kusper v. Pontikes, 414 U.S. 51, 56 (1973), quoted in Cousins v. Wigoda, 419 U.S. 477, 487 (1975)."

Because of the importance of free expression and association rights in the context of political campaigns, the Supreme Court in Buckley invalidated limitations on campaign expenditures, and upheld restrictions on contributions only because they were care-

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fully limited to the single interest that the court found legitimate in this area: the perception of undue influence created by large contributions to a candidate.[4/]

Activities by a political party in the primary process are even further insulated from government intrusion. In Democratic Party of the United States v. Wisconsin, 450 U.S. 119, the court held that members of the National Democratic Party's associational rights to determine who could participate in the processes leading to the selection of delegates at a national convention could not be limited by Wisconsin's interests in forcing the National Party to honor primary results. In so holding, the court followed its earlier holding in Cousins v. Wigoda, 419 U.S. 477, that state law did not have primacy over national political party's rules in determination of the qualifications and eligibility of delegates to the National Party's Convention. The court stated that "Illinois' interest in protecting the integrity of its electoral process cannot be compelling in the context of the selection of delegates to the National Party Convention."

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4/ As the Supreme Court has subsequently stated, "Buckley identified a single narrow exception to the rule that limits on political activity were contrary to the First Amendment. The exception relates to the perception of undue influence of large contributions to a candidate." Citizens Against Rent Control v. City of Berkeley, 454 U.S. at 297 (emphasis in original).

Id. at 491. The Cousins court relied upon the principle that "the National Democratic Party and its adherents enjoy a constitutionally protected right of political association." Id. at 487. For the reasons articulated in these cases, the Commission should be particularly hesitant before launching investigations into primary campaign activities which are, after all, essentially matters for the Democratic Party to resolve.

The constitutional implications of any commission regulation of political activities by delegate committees are clear. First, the constitutionally permissible scope of any regulation of delegate committee activities is limited by the Supreme Court's decision in Buckley to the single possibility of the perception of undue influence through contributions to a candidate. Conducting a full scale investigation on other issues is pointless, given the Supreme Court's Buckley ruling. Second, the investigation itself raises significant constitutional questions. By forcing the disclosure of committee workings, and enmeshing the committees in an investigation, the Commission risks infringing and chilling the rights of delegates to form committees to advance their cause. An investigation into the activities of the Florida Mondale Delegate Committees and other delegate committees supporting any candidate, should only be undertaken when there is far stronger evidence of misconduct than that which has been

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presented in this Complaint. In Federal Election Commission v. Florida Committee, 681 F.2d 1281 (11th Cir. 1982), the Court of Appeals recognized that:

> "A higher degree of scrutiny must attach before courts can compel disclosure of information that may impinge upon First Amendment associational rights."

Federal Election Commission v. Mechanists Non-Particant Political League, 665 F.2d 380 (D.C. Cir.), cert. denied, 454 U.S. 897 (1981). The Court of Appeals followed the Supreme Court's holding in Sweezy v. New Hampshire, 354 U.S. 234, 245 (1957), that:

> "It is particularly important that the exercise of the power of compulsory process be carefully circumscribed when the power of compulsory process tends to impinge upon such highly sensitive areas as freedom of speech or press, freedom of political association and freedom of communication of ideas. . . ."

While the Supreme Court upheld the constitutionality of the $5,000 contribution limit for committees in California Medical Association v. Federal Election Commission, 453 U.S. 182 (1981), that decision does not authorize the Commission to take an expansive view of the affiliation standards which would effectively nullify the opportunity provided under the Federal Election Campaign Act for individuals to form delegate committees in support of their own election as delegates to the National convention.

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IV. UNCERTAINTIES ABOUT THE ROLE OF UNION-RELATED PAC CONTRIBUTIONS TO DELEGATE COMMITTEES SHOULD BE ADDRESSED THROUGH THE COMMISSION'S RULE MAKING POWERS.

An investigation of delegate committees may well create political effects and ramifications on the presidential campaign. Walter Mondale has stated that he will take steps to refund contributions made to disputed delegate committees supporting his presidential campaign. In light of this action by Mr. Mondale, and by the reality that the presidential primary process for the 1984 campaign is at an end, there is no urgency for the Commission to undertake an investigation at this time which may create possible ramifications on the candidates and the general election campaign.

Ironically, the only way independent delegate committees could monitor political action committee contributions to ensure that the aggregate amount contributed by a single union-related PAC did not exceed the Act's limits would be to engage in the type of affiliated activity that the NRWC protests in this complaint. If the Commission believes it necessary, it should resolve the tension between the affiliation rules and the contribution limits through its rulemaking authority. As the law is currently written, individual delegate committees are not responsible for contributions that may be made to and received by other delegate committees. For this reason alone, there is no basis

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for subjecting the delegate committees to a formal investigation into the allegations of this complaint.

CONCLUSION

For the foregoing reasons, the Fourth, Fifth, Eighth, Ninth, Twelfth, Thirteenth and Fourteenth Congressional District Delegates for Mondale Committees, and the South Florida Delegates for Mondale Committee, urges that the Commission should find no reason to believe that a violation under the Federal Election Campaign Act has occurred.

Respectfully submitted,

GREENBERG, TRAURIG, ASKEW,
HOFFMAN, LIPOFF, ROSEN &
QUENTEL, P.A.

By: Marlene K. Silverman
MARLENE K. SILVERMAN

Stuart H. Singer
STUART H. SINGER

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BEFORE THE
FEDERAL ELECTION COMMISSION

NATIONAL RIGHT TO WORK COMMITTEE and RALPH MARTIN HETTINGA, JR., Complainants, v. WALTER F. MONDALE and MONDALE FOR PRESIDENT CAMPAIGN COMMITTEE, et al., Respondents.	MUR 1704 AFFIDAVIT OF GEORGE E. COMERFORD

STATE OF FLORIDA)
) SS:
COUNTY OF DADE)

BEFORE ME, the undersigned authority, personally appeared, GEORGE E. COMERFORD, who, after first being duly sworn, deposes and says that:

1. I am treasurer of the 14th Congressional District Delegates for Mondale Committee.

2. That the 14th Congressional District Delegates for Mondale Committee was formed and has been operated independent of the Mondale for President Committee and of other delegate committees supporting the candidacy of Mr. Mondale.

3. That upon formation, the 14th Congressional District Delegates for Mondale Committee timely registered with the Federal Election Commission pursuant to 11 C.F.R. part 102 and 2 U.S.C. §433, and thereafter complied with 11 C.F.R. part 104 and 2 U.S.C. §434 with respect to reporting contributions and expenditures.

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4. That the only assistance provided by the Mondale campaign staff in the formation of the delegate committees is a memorandum provided by the Mondale for President Committee describing the laws and Commission regulations governing the primary election process to insure that all committees were in strict compliance with these regulations.

5. That the 14th Congressional District Delegates for Mondale Committee has not accepted any contributions from union political action committees or from any other contributors in excess of the $5,000.00 contribution limit established by the Federal Election Campaign Act.

6. That the 14th Congressional District Delegates for Mondale Committee was not at any time subject to control of the Mondale for President Committee or the Mondale Presidential Campaign with respect to any of its operations, including the contents of its campaign materials or the Committees' decisions regarding contributions.

7. That the 14th Congressional District Delegates for Mondale Committee has never hired a Mondale campaign worker who has been laid off.

8. That the 14th Congressional District Delegates for Mondale Committee has never contributed any money to the Mondale for President Committee or to any other delegate committees.

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9. That the 14th Congressional District Delegates for Mondale Committee has not at any time accepted contributions from sources prohibited under the Federal Election Campaign Act or the regulations promulgated thereunder.

10. That the 14th Congressional District Delegates for Mondale Committee has acted in full compliance with the Federal Election Campaign Act, the regulations of Federal Election Commission and has remained an independent organization unaffiliated with the Mondale for President Committee or with other delegate committees supporting Walter Mondale.

11. That the statements made herein are true and correct to the best of my knowledge.

FURTHER AFFIANT SAYETH NAUGHT.

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George E. Comerford
GEORGE E. COMERFORD

SWORN TO AND SUBSCRIBED before me this 15 day of June, 1984.

Robert L. Mabry
NOTARY PUBLIC
State of Florida at Large

My Commission Expires:

Notary Public, State of Florida
My Commission Expires [illegible]

BEFORE THE
FEDERAL ELECTION COMMISSION

NATIONAL RIGHT TO WORK COMMITTEE and RALPH MARTIN HETTINGA, JR., Complainants, v. WALTER F. MONDALE and MONDALE FOR PRESIDENT CAMPAIGN COMMITTEE, et al., Respondents.	MUR 1704 AFFIDAVIT OF CALVIN D. DEVONEY

STATE OF FLORIDA)
) SS:
COUNTY OF DADE)

BEFORE ME, the undersigned authority, personally appeared, CALVIN D. DEVONEY, who, after first being duly sworn, deposes and says that:

1. I am treasurer of the 4th Congressional District Delegates for Mondale Committee.

2. That the 4th Congressional District Delegates for Mondale Committee was formed and has been operated independent of the Mondale for President Committee and of other delegate committees supporting the candidacy of Mr. Mondale.

3. That upon formation, the 4th Congressional District Delegates for Mondale Committee timely registered with the Federal Election Commission pursuant to 11 C.F.R. part 102 and 2 U.S.C. §433, and thereafter complied with 11 C.F.R. part 104 and 2 U.S.C. §434 with respect to reporting contributions and expenditures.

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4. That the only assistance provided by the Mondale campaign staff in the formation of the delegate committees is a memorandum provided by the Mondale for President Committee describing the laws and Commission regulations governing the primary election process to insure that all committees were in strict compliance with these regulations.

5. That the 4th Congressional District Delegates for Mondale Committee has not accepted any contributions from union political action committees or from any other contributors in excess of the $5,000.00 contribution limit established by the Federal Election Campaign Act.

6. That the 4th Congressional District Delegates for Mondale Committee was not at any time subject to control of the Mondale for President Committee or the Mondale Presidential Campaign with respect to any of its operations, including the contents of its campaign materials or the Committees' decisions regarding contributions.

7. That the 4th Congressional District Delegates for Mondale Committee has never hired a Mondale campaign worker who has been laid off.

8. That the 4th Congressional District Delegates for Mondale Committee has never contributed any money to the Mondale for President Committee or to any other delegate committees.

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9. That the 4th Congressional District Delegates for Mondale Committee has not at any time accepted contributions from sources prohibited under the Federal Election Campaign Act or the regulations promulgated thereunder.

10. That the 4th Congressional District Delegates for Mondale Committee has acted in full compliance with the Federal Election Campaign Act, the regulations of Federal Election Commission and has remained an independent organization unaffiliated with the Mondale for President Committee or with other delegate committees supporting Walter Mondale.

11. That the statements made herein are true and correct to the best of my knowledge.

FURTHER AFFIANT SAYETH NAUGHT.

CALVIN D. DEVONEY

SWORN TO AND SUBSCRIBED before me this 15 day of June, 1984.

NOTARY PUBLIC
State of Florida at Large

My Commission Expires:

Notary Public, State of Florida
My Commission Expires Oct. 11, 1987

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LAW OFFICES

GREENBERG, TRAURIG, ASKEW, HOFFMAN, LIPOFF, ROSEN & QUENTEL, P.A.

FRANK DELL
3:50
GCC# 2476

LINDA KOOBRICK ADLER
MICHAEL O. ALBERTINE
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RUDOLPH F. ARAGON
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STEVEN A. LANDY
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DEBBIE RUTH MALINSKY
GREGORY A. MARTIN
PEDRO A. MARTIN
ALAN M. MITCHEL
LOUIS NOSTRO
ANTHONY J. O'DONNELL, JR.
ROGER D. OSBURN
BYRON G. PETERSEN
VICTOR H. POLK, JR.
ALBERT D. QUENTEL
NICHOLAS ROCKWELL
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DAVID L. ROSS
DAVID P. ROWE
ROBERT M. RUBENSTEIN
CLIFFORD A. SCHULMAN
MARK SCHWIMMER
MARTIN S. SHAPIRO
MARLENE K. SILVERMAN
STUART H. SINGER
TIMOTHY A. SMITH
DANIEL A. SUCHMAN
HERBERT M. SUSKIN
YOLANDA MELLON TARAFA
ROBERT H. TRAURIG
STANLEY H. WAKSHLAG
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TELEPHONES
MIAMI (305) 579-0500
BROWARD (305) 523-8111
TELEX 80-3184
TELECOPY (305) 579-0717
WRITER'S DIRECT NO.:

June 4, 1984

Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20005

Re: Complaint of Americans with Hart, Inc. v. Mondale for President Committee, Inc. filed April 6, 1984, MUR 1667

Dear Commissioners:

This response is filed on behalf of Florida delegate committees which support the candidacy of Walter Mondale in the Fourth, Eighth, Ninth and Fourteenth Congressional Districts and the South Florida Delegates for Mondale Committee and is being filed in opposition to the above-referenced Complaint of Americans with Hart, Inc. filed on April 6, 1984 and subsequently supplemented or amended on April 18, April 27, May 2 and May 22, 1984. In its Complaint, the Hart Committee asserts that delegate committees may not make expenditures for grass roots campaign activities on the terms available to delegates when they act individually. The Hart Committee also requests that the Federal

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Election Commission ("Commission") rule that all committees established by Mondale delegates are affiliated with one another and with the Mondale for President Committee ("MPC"). In this way, the complainant attempts to subject the delegates, along with the MPC, to a common contribution and expenditure limitation.

For the reasons set forth below, we submit that the allegations presented by Americans with Hart, Inc. do not warrant further investigation by the Commission. Initially, we would urge the Commission to require a "high threshold" of proof before commencing such an investigation. Investigations of allegedly improper campaign activities, once launched, attract considerable public attention, notwithstanding the confidentiality provisions of the Federal Election Campaign Act, and may impact upon the presidential campaign itself. Indeed, creating such publicity may be a prime purpose behind the filing of this Complaint. Moreover, such investigations may infringe upon or "chill" the exercise of political expression and associational rights by grass roots groups such as the Florida delegate committees by enmeshing the committees in often protracted, costly and burdensome proceedings. Unless such investigations are carefully limited, they may hinder the very type of local volunteer activity which the Chairman of the Commission has characterized as

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"the essence of healthy election campaigning," Federal Election Campaign Act Amendments of 1979, "Hearings before the Senate Committee on Rules and Administration," 96th Congress, 1st Sess. at 8 (1979), and which Congress has sought to encourage in enacting the coattails provisions of the Federal Election Campaign Act Amendments of 1979. 2 U.S.C. §431(8)(b)(i).[1/] The Commission has also acted to facilitate in the delegate selection process similar campaign activity to that encouraged in the general election by the statutory coattails provision. See FEC Explanation and Justification, 1 Federal Election Campaign Finance Guide (CCH), ¶ 864 at 1561-1567. The Commission's objective would be undermined if full scale investigations are undertaken upon such wide ranging and unconfirmed accusations as those made in the Hart Committee Complaint. Although the Commission has not articulated the level of cause which must exist before proceeding to a formal investigation, at least in the context of grass roots campaign activity, the burden of proof upon a complainant should be substantial.

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1/ Under these provisions, candidates for public office, including presidential candidates, may coordinate grass roots campaigning without violating the Act.

I. THE HART COMMITTEE COMPLAINT FAILS TO MEET THE SPECIFICITY REQUIREMENTS ESTABLISHED BY THE COMMISSION.

The Federal Election Campaign Act, 2 U.S.C. §437G(a)(1), and Commission regulations promulgated thereunder, 11 C.F.R. §111.4, require, inter alia, that a complaint must clearly identify as a respondent each person or entity who is alleged to have committed a violation. 11 C.F.R. §111.4. None of the allegations submitted in the Hart Committee's Complaint, or the supplements thereto, have identified any activities conducted by the Fourth, Eighth, Ninth or Fourteenth Congressional District's Delegates for Mondale Committees or the South Florida Delegates for Mondale group. Indeed the only allegations directed at any Florida committees in the Complaint are vague charges that funds were transferred by New Hampshire committee to several Florida committees and that three Florida committees happened to use the same commercial printer in Hollywood, Florida. Not only do these allegations fail to constitute violations of the Federal Election Campaign Act or regulations promulgated thereunder, but neither the Complaint nor the underlying source identifies the Florida delegate committees which purportedly have received impermissible contributions or have improperly coordinated their activities. This is a fatal defect in the Complaint which should lead the Commission to take no further action at this time. It is precisely such open-ended allegations as these which require far-

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ranging investigations threatening the confidentiality of the investigatory process and interfering with the associational rights of the delegates.

Furthermore, the Hart Complaint is based on inaccurate and undocumented newspaper articles which fail to meet the Commission's policy with regard to the opening of compliance actions on the basis of newspaper accounts. See Commission Memorandum No. 663 (November 15, 1979). That policy requires a news account to be well documented, substantial, and to meet all of the requirements of a complaint in order to constitute a sufficient basis for an enforcement action. The news accounts relied upon in the Hart Complaint do not meet this standard. They are based on speculative and conclusory quotes which do not set forth a substantive statement of facts. For this reason the allegations set forth in the Hart Complaint, particularly those allegations concerning the affiliation of delegate committees with each other and with the MPC, do not create a sufficient basis for further investigation.

The Florida delegate committees filing this response have fully complied with the Federal Election Campaign Act and the Commission's regulations. If and when a complaint is filed which alleges violations by one of the Florida delegate committees filing this response, said committee will welcome the opportunity to demonstrate to the Commission that the allegation is bareless.

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II. THE HART COMPLAINT IS BASED ON AN ERRONEOUS VIEW OF THE COMMISSION'S DELEGATE COMMITTEE REGULATIONS.

A. Delegates, Acting Through A Committee, May Make Expenditures For Volunteer Activities On The Same Terms Available When Delegates Act Individually.

The Commission's Regulations, §110.14, deal with contributions to and expenditures by delegates. The regulations entitle all delegates to spend unlimited amounts for advocating their own selection and for volunteer campaign materials which promote both delegates and their presidential candidate, as long as such materials are used in volunteer activities and do not involve general public advertising. The applicability of these provisions to delegate committees is reflected in the language in these very rules requiring delegates who exercise these rights through committees to register and report with the Commission. The rule also makes clear that committees must observe the Federal Election Campaign Act's limits when making or receiving contributions. The regulation does not, however, establish any limitations on expenditures for delegate committees. It follows that all delegates, whether acting individually or through committees may make the exempt expenditures allowed under §110.14(d)(1). The Commission was certainly aware of the fact that delegate committees would make such expenditures, and would have spelled out such restrictions if they were intended.

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The Commission's summary of rules pertaining to delegate committee expenditures confirms this interpretation. The Commission stated that all expenditures by delegate committees are reportable, and "an expenditure for public political advertising which advocates the selection of a delegate which also refers to a presidential primary candidate is considered either an allocable in-kind contribution or an allocable independent expenditure on behalf of the presidential candidate." FEC Record, December 1983. No other limitation for delegate committee expenditures is stated. Accordingly, delegate committees enjoy the rights afforded to individual delegates to make expenditures advocating their selection in supporting their presidential candidate, as long as such expenditures are limited to volunteer campaign materials. Moreover, any other interpretation would discourage the team campaigning that Congress and the Commission sought to encourage in enacting the coattail provisions enacted in the Federal Election Campaign Act of 1979. 2 U.S.C. §431(8)(b)(xi); 11 C.F.R. §100.7(b)(16).

Neither the Hart Committee Complaint, nor anything in the regulatory history of the regulations at issue suggest any policy reason for treating delegate committees differently than individual delegates. Clearly, the delegate committees are not a "scheme" to evade the contribution and expenditure limitations.

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Under the regulations, individual delegates may raise and spend unlimited amounts on volunteer campaign materials without any disclosure. Second, contributions for individual delegates are not subject to any limitations when made by a political committee and are subject only, to a $25,000 limitation when made by individuals. If the MPC had intended to follow a scheme to evade the contribution and expenditure limitations, as the Hart Committee Complaint suggests, using individual delegates - who need not even register and report, unlike delegate committees - would have been a far easier path.

B. Delegate Committees Are Not Affiliated With Each Other Or With The Mondale For President Committee.

Florida delegate committees represented in this response are independently established autonomous committees who are not affiliated either with other committees operating throughout the state and nation or with the MPC. The standards for affiliation for the purpose of the Act's contribution limitations are set forth at 2 U.S.C. §441A(a)(5). That section states that all contributions made by political committees "established, financed, maintained or controlled by [the same] person" shall be considered to have been made by a single political committee. The Commission has interpreted the general statutory standards set forth in §441A(a)(5) by prescribing five

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factors to be used in determining whether committees are affiliated 11 C.F.R. §100.5(g)(2)(ii): (1) ownership by one committee of a controlling interest in voting shares or securities in another committee; (2) provisions of by-laws, constitutions or other documents by which one committee has the authority, power or ability to direct another committee; (3) the authority, power or ability of one committee to hire, appoint, discipline, discharge, demote or remove or otherwise influence the decision of the officer or members of the other committees; (4) similar patterns of contributions by the committees in questions; and (5) the transfer of funds between committees which represent a substantial portion of the funds of the committees in question.

The allegations in the Hart Committee Complaint, even if accepted on their face, do not satisfy the Commission's affiliation criteria. Moreover, the Florida delegate committees, on whose behalf this response is filed, are not even mentioned. Until the complainant establishes that the affiliation standards have been met, there is no reason for a formal investigation. The Florida delegate committees filing this response were established by delegates independently of the MPC. The formation of the committees, appointment of treasurers, the choice of a committee name, opening of a bank account and other actions were all performed independently by each committee. The delegate com-

mittees financed their operations through fund raisers and other means and controlled their own activities. The MPC enjoyed no control over the members of the committee.

The Hart Complaint strives to create an aura of impropriety because delegate campaign flyers emphasize the candidate other then the delegates and because the MPC provided delegate committees with legal advice pertaining to federal election law. Obviously, voters will vote for delegates who support the presidential candidate they favor and delegate campaigning naturally focuses on the candidate the particular delegate supports. Furthermore, legal advice on commission regulations is not a basis upon which the Commission may find that delegate committees have affiliated themselves with the national campaign. See 2 U.S.C. §431(8)(B)(ix).

III. COMMISSION REGULATIONS SHOULD BE INTERPRETED IN LIGHT OF THE DELEGATES CONSTITUTIONAL RIGHTS TO POLITICAL ASSOCIATION THROUGH COMMITTEES.

The FEC is being asked to investigate committee activities which are fully subject to First Amendment protection. The organization of groups to participate in the political process lies at the core of the First Amendment rights of expression and association. As Chief Justice Burger stated for the Supreme Court in Citizens Against Rent Control v. City of Berkeley, 454 U.S. 290, 294 (1982):

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> "[T]he practice of persons sharing common views banning together to achieve a common end is deeply embedded in the American political process. . . . The tradition of volunteer committees for collective action has manifested itself in myriad community and public activities; in the political process, it can focus on a candidate or on a ballot measure. Its value is that by collective effort, individuals can make their views known when, individually, their voices would be faint or lost."

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Any interpretation of Commission regulations, or for that matter, any direct regulation either by this Commission or even by the Congress which infringed on the rights of individual delegates to campaign together through delegate committees would be constitutionally suspect:

> Effective advocacy of both public and private points of view, particularly controversial ones, is undeniably enhanced by group association, as this Court has more than once recognized by remarking upon the close nexus between the freedoms of speech and assembly.

NAACP v. Alabama, 357 U.S. 449, 460 (1958); Buckley v. Valeo, 424 U.S. 1, 14 (1976); Citizens Against Rent Control v. City of Berkeley, 454 U.S. at 294; Federal Election Commission v. Florida for Kennedy Committee, 681 F.2d 1281, 1284-1285 (11th Cir. 1982). In Buckley v. Valeo, the Supreme Court made clear that:

> "The First Amendment protects political association, as well as political expression. The constitutional right of association explicated in NAACP v. Alabama, 357 U.S. 449 (1958), stems from the Court's recognition that "effective advocacy of both public and private points of view, particularly controversial ones, is undeniably enhanced by group association.' Subsequent decisions have made clear that the First and Fourteenth Amendments guarantee 'freedom to associate with others for the common advancement of political beliefs and ideas,' a freedom that encompasses 'the right to associate with the political party of one's choice.' Kusper v. Pontikes, 414 U.S. 51, 56 (1973), quoted in Cousins v. Wigoda, 419 U.S. 477, 487 (1975)."

Because of the importance of free expression and association rights in the context of political campaigns, the Supreme Court in Bucklev invalidated limitations on campaign expenditures, and upheld restrictions on contributions only because they were carefully limited to the single interest that the court found legitimate in this area: the perception of undue influence created by large contributions to a candidate.[2/]

Activities by a political party in the primary process are even further insulated from government intrusion. In Democratic

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2/ As the Supreme Court has subsequently stated, "Bucklev identified a single narrow exception to the rule that limits on political activity were contrary to the First Amendment. The exception relates to the perception of undue influence of large contributions to a candidate." Citizens Against Rent Control v. City of Berkeley, 454 U.S. at 297 (emphasis in original).

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Party of the United States v. Wisconsin, 450 U.S. 119, the court held that members of the National Democratic Party's associational rights to determine who could participate in the processes leading to the selection of delegates at a national convention could not be limited by Wisconsin's interests in forcing the National Party to honor primary results. In so holding, the court followed its earlier holding in Cousins v. Wigoda, 419 U.S. 477, that state law did not have primacy over national political party's rules in determination of the qualifications and eligibility of delegates to the National Party's Convention. The court stated that "Illinois' interest in protecting the integrity of its electoral process cannot be compelling in the context of the selection of delegates to the National Party Convention." Id. at 491. The Cousins court relied upon the principle that "the National Democratic Party and its adherents enjoy a constitutionally protected right of political association." Id. at 487. For the reasons articulated in these cases, the Commission should be particularly hesitant before launching investigations into primary campaign activities which are, after all, essentially matters for the Democratic Party to resolve.

The constitutional implications of any commission regulation of political activities by delegate committees are clear. First,

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the constitutionally permissible scope of any regulation of delegate committee activities is limited by the Supreme Court's decision in Buckley to the single possibility of the perception of undue influence through contributions to a candidate. Conducting a full scale investigation on other issues is pointless, given the Supreme Court's Buckley ruling. Second, the investigation itself raises significant constitutional questions. By forcing the disclosure of committee workings, and enmeshing the committees in an investigation, the Commission risks infringing and chilling the rights of delegates to form committees to advance their cause. An investigation into the activities of the Florida Mondale Delegate Committees and other delegate committees supporting any candidate, should only be undertaken when there is far stronger evidence of misconduct than that which has been presented in this Complaint. In Federal Election Commission v. Florida Committee, 681 F.2d 1281 (11th Cir. 1982), the Court of Appeals recognized that:

> "A higher degree of scrutiny must attach before courts can compel disclosure of information that may impinge upon First Amendment associational rights."

Federal Election Commission v. Mechanists Non-Particant Political League, 665 F.2d 380 (D.C. Cir.), cert. denied, 454 U.S. 897 (1981). The Court of Appeals followed the Supreme Court's

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holding in Sweezy v. New Hampshire, 354 U.S. 234, 245 (1957), that:

> "It is particularly important that the exercise of the power of compulsory process be carefully circumscribed when the power of compulsory process tends to impinge upon such highly sensitive areas as freedom of speech or press, freedom of political association and freedom of communication of ideas. . . ."

Third, cast in its best light, the Hart Complaint only points to an ambiguity in the Commission's regulations as to whether delegates may make expenditures as delegate committees, as well as individually. It is a well established constitutional principle that, in cases of statutory ambiguity, a statute should be construed to avoid creating constitutional problems. "If the interpretation complained of 'presents a significant risk that the First Amendment interest will be infringed,' any ambiguity in statute is construed in the manner to avoid such constitutional problems. Federal Election Commission v. Florida for Kennedy Committee, 681 F.2d at 1287. See also Rescue Army v. Municipal Court, 331 U.S. 549 (1947); Ashwander v. T.V.A., 297 U.S. 288, 345 (1936) (Brandeis, J. concurring). The same principle should apply with equal force to the Commission's determinations of whether ambiguity in its regulations should be construed in a manner which is restrictive of political activity protected by the First amendment.

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IV. UNCERTAINTIES ABOUT THE ROLE OF DELEGATE COMMITTEES IN PRIMARY CAMPAIGNS SHOULD BE ADDRESSED THROUGH THE COMMISSION'S RULE MAKING POWERS.

An investigation of delegate committees may well create political effects and ramifications on the presidential campaign. Walter Mondale has stated that he will take steps to refund contributions made to disputed delegate committees supporting his presidential campaign and count monies spent by the committee against overall federal spending limits. In light of these actions by Mr. Mondale, and by the reality that the presidential primary process for the 1984 campaign is at an end, there is no urgency for the Commission to undertake an investigation at this time which may create possible ramifications on the candidates and the election campaign. If the Commission believes there are ambiguities in the delegate regulations which require clarification, the Commission should do so through its rule making authority. In this manner, the Commission can more fully address the broader policy questions at stake without prejudicing the rights and campaigns of any candidate in this election, and without intruding upon the valued rights of free expression and association protected by the United States Constitution.

CONCLUSION

For the foregoing reasons, the Fourth, Eighth, Ninth and Fourteenth Congressional District Delegates for Mondale Com-

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mittees, and the South Florida Delegates for Mondale Group, urges that the Commission should find no reason to believe that a violation under the Federal Election Campaign Act has occurred.

Respectfully submitted,

GREENBERG, TRAURIG, ASKEW,
HOFFMAN, LIPOFF, ROSEN &
QUENTEL, P.A.

By: Marlene K. Silverman
MARLENE K. SILVERMAN

Stuart H. Singer
STUART H. SINGER

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Robert A. Sugarman, Treasurer
South Florida Delegates For
Mondale
P.O. Drawer 520337
1951 N W 17th Avenue
Miami, FL 33152

Re: MUR 1667

Dear Mr. Sugarman:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against the committee and you, as treasurer, in connection with this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you intend to be represented by counsel in this matter please advise the Commission by 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.

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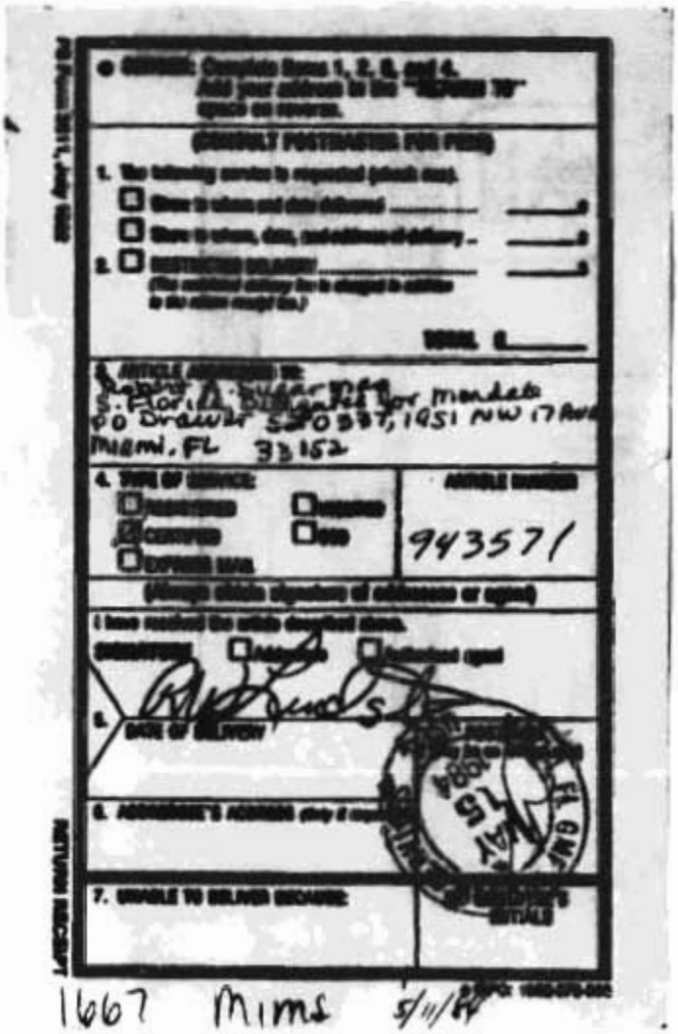
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

Enclosures
1. Complaint
2. Procedures
3. Designation of Counsel Statement



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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Samuel C. Catherwood, Treasurer
Delegates For Mondale
P.O. Box 8796
1100 Cesery Blvd
Jacksonville, FL 32211

Re: MUR 1667

Dear Mr. Catherwood:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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If you intend to be represented by counsel in this matter please advise the Commission by 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.

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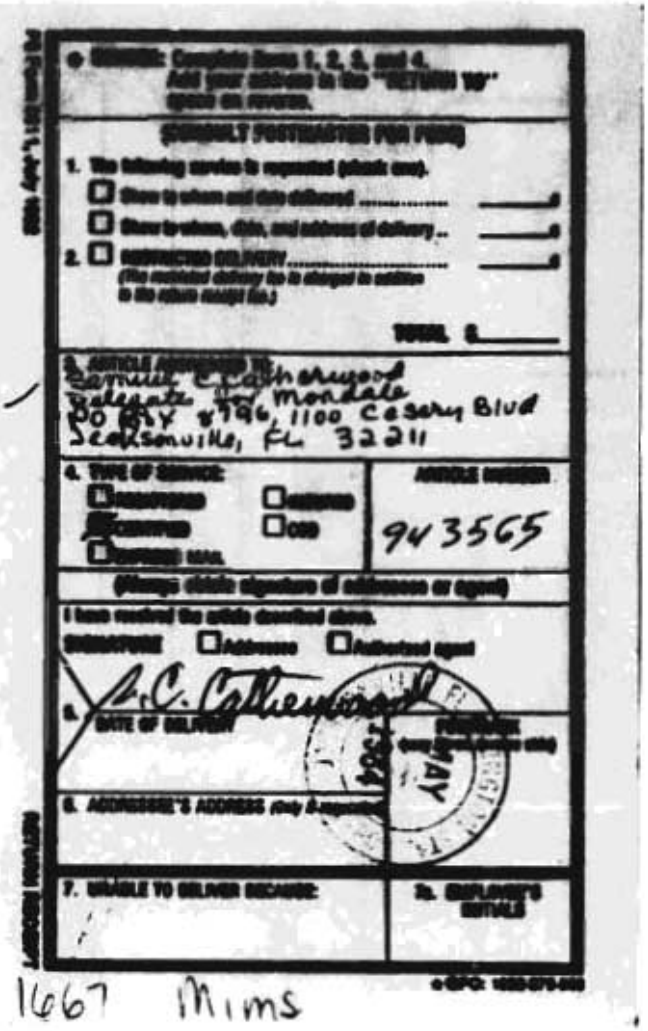
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

Enclosures
1. Complaint
2. Procedures
3. Designation of Counsel Statement



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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Angelique O. Stahl, Treausrer
Mondale 16th District Delegate
Committee
11621 N W 23rd Street
Pembroke Pines, FL 33026

Re: MUR 1667

Dear Ms. Stahl:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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If you intend to be represented by counsel in this matter please advise the Commission by 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.

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If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

Enclosures
1. Complaint
2. Procedures
3. Designation of Counsel Statement

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Robert D. Parks, Treasurer
Mondale 15th District
Delegate Committee
440 S. Andrews Avenue
Ft Lauderdale, FL 33301

Re: MUR 1667

Dear Mr. Parks:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against the committee and you, as treasurer, in connection with this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you intend to be represented by counsel in this matter please advise the Commission by 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.

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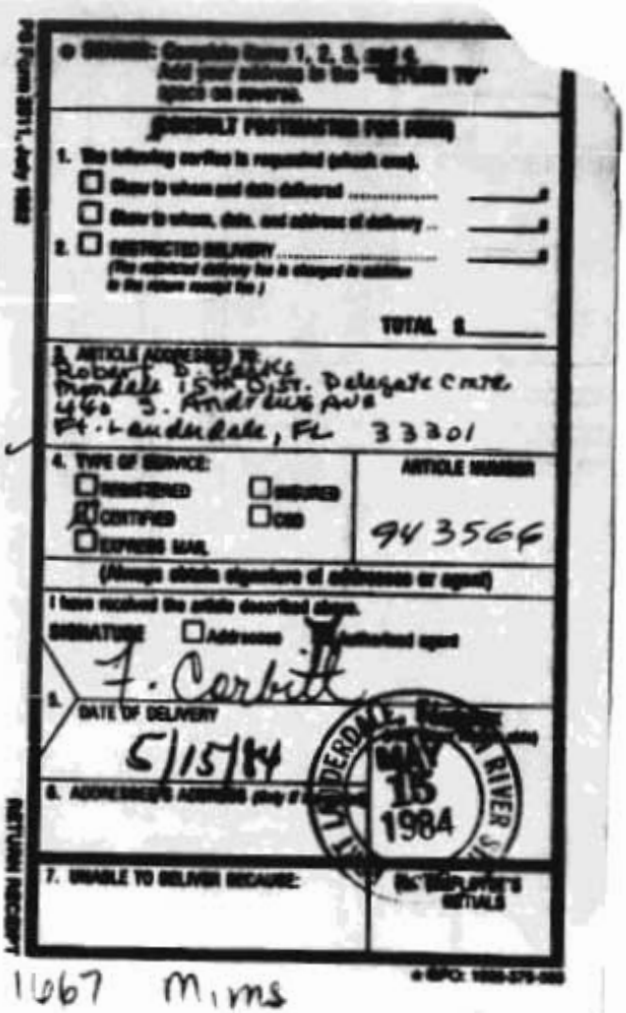
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

Enclosures
1. Complaint
2. Procedures
3. Designation of Counsel Statement



11067 Mims

9574050016965

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FEC
#3728

June 19, 1984

8504050169 7

Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20005

Re: Complaint of the National Right to Work Committee, et al. v. Walter F. Mondale and Mondale For President Campaign Committee, et al., MUR 1704

Dear Commissioners:

This response is filed on behalf of Florida Delegate Committees which support the candidacy of Walter Mondale in the Fourth, Fifth, Eighth, Ninth, Northern Twelfth, Thirteenth and Fourteenth Congressional Districts and the South Florida Delegates for Mondale Committee and is being filed in opposition to the above-referenced complaint of the National Right to Work Committee and Ralph Martin Hettinga, Jr. filed on May 21, 1984. In its complaint, the National Right To Work Committee ("NRWC") asserts that a number of union-related political action committees have

evaded the contribution limits of the Federal Election Campaign Act by making contributions to delegate committees which NRWWC assets are affiliated with one another and with the Mondale for President Committee ("MPC"). The complainant requests that the Commission hold the independent Mondale delegate committees throughout the country, along with the MPC, to a single common contribution limitation.

For the reasons set forth below, we submit that the allegations presented by the complainant do not warrant further investigation by the Commission. Initially, we would urge the Commission to require a "high threshold" of proof before commencing such an investigation. Investigations of allegedly improper campaign activities, once launched, attract considerable public attention, notwithstanding the confidentiality provisions of the Federal Election Campaign Act, and may impact upon the presidential campaign itself. Indeed, creating such publicity may be a prime purpose behind the filing of this Complaint. Moreover, such investigations may infringe upon or "chill" the exercise of political expression and associational rights by grass roots groups such as the Florida delegate committees by enmeshing the committees in often protracted, costly and burdensome proceedings. Unless such investigations are carefully limited, they may hinder the very type of local volunteer activity which the Chair-

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man of the Commission has characterized as "the essence of healthy election campaigning," Federal Election Campaign Act Amendments of 1979, "Hearings before the Senate Committee on Rules and Administration," 96th Congress, 1st Sess. at 8 (1979), and which Congress has sought to encourage in enacting the coattails provisions of the Federal Election Campaign Act Amendments of 1979. 2 U.S.C. §431(8)(b)(i).[1/] The Commission has also acted to facilitate in the delegate selection process similar campaign activity to that encouraged in the general election by the statutory coattails provision. See FEC Explanation and Justification, 1 Federal Election Campaign Finance Guide (CCH), ¶ 864 at 1561-1567. The Commission's objective would be undermined if full scale investigations are undertaken upon such wide ranging and unconfirmed accusations of affiliation as those made in the NRWC Complaint. Although the Commission has not articulated the level of cause which must exist before proceeding to a formal investigation, at least in the context of grass roots campaign activity, the burden of proof upon a complainant should be substantial.

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1/ Under these provisions, candidates for public office, including presidential candidates, may coordinate grass roots campaigning without violating the Act.

I. THE FEDERAL ELECTION CAMPAIGN ACT DOES NOT PROHIBIT "AFFILIATION" AMONG COMMITTEES RECEIVING CONTRIBUTIONS.

The NRWC Complaint is predicated on 2 U.S.C. § 441a(a)(5), which states that all contributions made by political committees "established, financed, maintained, or controlled by [the same] person" shall be considered to have been made by a single political committee. NRWC, however, is not alleging affiliation among the contributing sources but rather among the recipient delegate committees. Neither 2 U.S.C. § 441a(a)(5), nor any other provision of the Act authorizes the Commission to treat contributions made to delegate committees as contributions made to the candidate. That the Commission should not assume such authority is implicit from § 441a(a)(7)(A) which states only that contributions made to a political committee "authorized by such candidate to accept contributions on his behalf" shall be considered as contributions made to the candidate. If Congress had intended to consider other contributions -- such as those involved here -- as contributions to the candidate, it would have so legislated.

This interpretation is supported by § 441a(a)(5)(A) which states that the "affiliation" provisions of that section do not limit "transfers between political committees of funds raised through joint fund raising efforts." Moreover, § 441a(a)(4) stipulates that the limitations on contributions "do not apply to transfers between and among political committees which are

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national, state, district or local committees (including any subordinate committee thereof) of the same political party," although clearly the activities of such committees are closely coordinated. The Supreme Court gave related provisions of the Act, allowing such transfers for Senatorial campaigns, an expansive interpretation in upholding the Commission's interpretation in Federal Election Comm. v. Democratic Senatorial Campaign Committee, 454 U.S. 27 (1981).

Not only did Congress not authorize the Commission to take the action complainant requests, but there is an obvious reason why delegate committees should not be subject to single contribution limits. Unless the committees do in fact coordinate their actions and exchange records, there is no way one delegate committee can determine whether a given contribution tendered to it violates the Act's contribution limits.

II. FLORIDA DELEGATE COMMITTEES ARE NOT AFFILIATED WITH EACH OTHER OR WITH THE MONDALE FOR PRESIDENT COMMITTEE.

Florida delegate committees filing this response are independently established autonomous committees who are not affiliated either with other committees operating throughout the state and nation or with the MPC. Thus, even if the standards for affiliation for the purpose of the Act's contribution limitations set forth at 2 U.S.C. § 441a(a)(5) are relevant to this com-

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plaint, the Florida delegate committees have not been so affiliated. The Commission has interpreted the general statutory standards set forth in § 441a(a)(5) by prescribing five factors to be used in determining whether committees are affiliated 11 C.F.R. § 100.5(g)(2)(ii): (1) ownership by one committee of a controlling interest in voting shares or securities in another committee; (2) provisions of by-laws, constitutions or other documents by which one committee has the authority, power or ability to direct another committee; (3) the authority, power or ability of one committee to hire, appoint, discipline, discharge, demote or remove or otherwise influence the decision of the officer or members of the other committees; (4) similar patterns of contributions by the committees in questions; and (5) the transfer of funds between committees which represent a substantial portion of the funds of the committees in question.

The allegations in the NRWC Complaint, even if accepted on their face, do not satisfy the Commission's affiliation criteria. Moreover, the Florida delegate committees on whose behalf this response is filed are not specifically mentioned by the allegations concerning affiliation. Until the complainant establishes that the affiliation standards have been met, there is no reason for a formal investigation. As documented by the attached

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affidavits,[2] the Florida delegate committees filing this response were established by delegates independently of the MPC. The formation of the committees, appointment of treasurers, the choice of a committee name, opening of a bank account and other actions were all performed independently by each committee. The delegate committees financed their operations through fund raisers and other means and controlled their own activities. The MPC enjoyed no control over the members of the committee.

Relying on various news accounts,[3] the complaint asserts that the national Modale staff "instructed" delegate committees on how to organize and operate, that Mondale staff were transfer-

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2/ Supporting affidavits on behalf of other committees will be forwarded as soon as possible as a supplemental filing to this response.

3/ For the most part, the news accounts relied upon in the complaint failed to meet the Commission's policy with regard to the opening of compliance actions on the basis of newspaper accounts. See Commission Memorandum No. 663 November 15, 1979. That policy requires a news account to be well documented, substantial, and to meet all of the requirements of a complaint in order to constitute a sufficient basis for an enforcement action. The news accounts relied upon in the NWRC complaint do not meet this standard. They are based on speculative and conclusory quotes which do not set forth a substantive statement of facts. For this reason, the allegations concerning the affiliation of delegate committees with each other and with the MPC based on newspaper articles do not create a sufficient basis for further investigation.

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red to the delegate committees, that committees declined PAC contributions at Mr. Mondale's request, that the MPC's office of legal counsel was made available to advise delegate committees, that funds were transferred from a delegate committee in one state to a sister group in another, that certain registration statements for different committees were purportedly written by the same person and mailed in envelopes typed on the same typewriter and reported joint spending at the same print shops, and that delegate committees started disbanding after Walter Mondale requested them to do so. Each of these allegations is addressed below, and the response to these allegations is supported by sworn affidavits from the delegate committee treasurers.

1. The only assistance provided by the Mondale staff in the formation of the delegate committees filing this response was a memorandum provided by the MPC describing the laws and commission regulations governing the primary election process to insure that all committees were in strict compliance with these regulations. The provision of such legal assistance is expressly authorized by 2 U.S.C. § 431(8)(B)(ix).

2. The Florida delegate committees represented herein have not hired any MPC campaign workers.

3. Mr. Mondale's decision to request delegate committees supporting his candidacy not to accept PAC contributions hardly

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can be the basis for a finding of an affiliation among the committees and the MPC. In the first place, there is nothing whatever to suggest that the committees followed Mr. Mondale's direction in this regard. In Florida, at least, the primary had already been conducted at this time and contributions from any source, including political action committees, were no longer needed. A committee's decision not to accept further contributions hardly demonstrates that the delegate committees actions were being orchestrated by Mr. Mondale or the MPC. To the contrary, the delegate committees' earlier decisions to accept limited contributions from political action committee sources while Mr. Mondale had decided not to accept such contributions for the purposes of his own campaign illustrates the independence of decisionmaking between the MPC and the delegate committees.

4. The availability of legal advice to the delegate committees is not a basis on which affiliation may be found. Indeed, even the provision of legal advice regarding Commission regulations is not a basis upon which the Commission may find the delegate committees to have affiliated themselves with the national campaign. See 2 U.S.C. § 431(8)(B)(ix).

5. The delegate committees represented in this response have not contributed any money to the MPC or to any other delegate committees.

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6. The allegations concerning the use of a similar typewriter or printer, even if true, hardly support a finding of affiliation as set forth under the Commission's regulations.

7. The fact that some delegate committees disbanded after the purpose for which they were created -- the primary elections -- concluded is hardly surprising and is not indicative of any affiliation among the committees or affiliation with the national campaign.

In sum, the alleged coordination and control of the delegate committees by the Mondale campaign has not been established, at least with respect to the Florida delegate committees filing this response. Furthermore, the private investigatory reports discussed on page 6 of the complaint do not identify any of the Florida delegate committees filing this response as having been involved in any allegedly "affiliated" activity. For these reasons, there is no basis for concluding that the Mondale delegate committees are affiliates of the Mondale campaign and share a single limit on contributions that they may receive from any one source for the election.

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III. COMMISSION INTERPRETATIONS SHOULD BE INTERPRETED IN LIGHT OF THE DELEGATES' CONSTITUTIONAL RIGHTS TO POLITICAL ASSOCIATION THROUGH COMMITTEES.

The FEC is being asked to investigate committee activities which are fully subject to First Amendment protection. The organization of groups to participate in the political process lies at the core of the First Amendment rights of expression and association. As Chief Justice Burger stated for the Supreme Court in Citizens Against Rent Control v. City of Berkeley, 454 U.S. 290, 294 (1982):

> "[T]he practice of persons sharing common views banning together to achieve a common end is deeply embedded in the American political process. . . . The tradition of volunteer committees for collective action has manifested itself in myriad community and public activities; in the political process, it can focus on a candidate or on a ballot measure. Its value is that by collective effort, individuals can make their views known when, individually, their voices would be faint or lost."

Any interpretation of Commission regulations, or for that matter, any direct regulation either by this Commission or even by the Congress which infringed on the rights of individual delegates to campaign together through delegate committees would be constitutionally suspect:

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> Effective advocacy of both public and private points of view, particularly controversial ones, is undeniably enhanced by group association, as this Court has more than once recognized by remarking upon the close nexus between the freedoms of speech and assembly.

NAACP v. Alabama, 357 U.S. 449, 460 (1958); Buckley v. Valeo, 424 U.S. 1, 14 (1976); Citizens Against Rent Control v. City of Berkeley, 454 U.S. at 294; Federal Election Commission v. Florida for Kennedy Committee, 681 F.2d 1281, 1284-1285 (11th Cir. 1982).

In Buckley v. Valeo, the Supreme Court made clear that:

> "The First Amendment protects political association, as well as political expression. The constitutional right of association explicated in NAACP v. Alabama, 357 U.S. 449 (1958), stems from the Court's recognition that "effective advocacy of both public and private points of view, particularly controversial ones, is undeniably enhanced by group association.' Subsequent decisions have made clear that the First and Fourteenth Amendments guarantee 'freedom to associate with others for the common advancement of political beliefs and ideas,' a freedom that encompasses 'the right to associate with the political party of one's choice.' Kusper v. Pontikes, 414 U.S. 51, 56 (1973), quoted in Cousins v. Wigoda, 419 U.S. 477, 487 (1975)."

Because of the importance of free expression and association rights in the context of political campaigns, the Supreme Court in Buckley invalidated limitations on campaign expenditures, and upheld restrictions on contributions only because they were care-

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fully limited to the single interest that the court found legitimate in this area: the perception of undue influence created by large contributions to a candidate.[4/]

Activities by a political party in the primary process are even further insulated from government intrusion. In Democratic Party of the United States v. Wisconsin, 450 U.S. 119, the court held that members of the National Democratic Party's associational rights to determine who could participate in the processes leading to the selection of delegates at a national convention could not be limited by Wisconsin's interests in forcing the National Party to honor primary results. In so holding, the court followed its earlier holding in Cousins v. Wigoda, 419 U.S. 477, that state law did not have primacy over national political party's rules in determination of the qualifications and eligibility of delegates to the National Party's Convention. The court stated that "Illinois' interest in protecting the integrity of its electoral process cannot be compelling in the context of the selection of delegates to the National Party Convention."

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4/ As the Supreme Court has subsequently stated, "Buckley identified a single narrow exception to the rule that limits on political activity were contrary to the First Amendment. The exception relates to the perception of undue influence of large contributions to a candidate." Citizens Against Rent Control v. City of Berkeley, 454 U.S. at 297 (emphasis in original).

Id. at 491. The Cousins court relied upon the principle that "the National Democratic Party and its adherents enjoy a constitutionally protected right of political association." Id. at 487. For the reasons articulated in these cases, the Commission should be particularly hesitant before launching investigations into primary campaign activities which are, after all, essentially matters for the Democratic Party to resolve.

The constitutional implications of any commission regulation of political activities by delegate committees are clear. First, the constitutionally permissible scope of any regulation of delegate committee activities is limited by the Supreme Court's decision in Buckley to the single possibility of the perception of undue influence through contributions to a candidate. Conducting a full scale investigation on other issues is pointless, given the Supreme Court's Buckley ruling. Second, the investigation itself raises significant constitutional questions. By forcing the disclosure of committee workings, and enmeshing the committees in an investigation, the Commission risks infringing and chilling the rights of delegates to form committees to advance their cause. An investigation into the activities of the Florida Mondale Delegate Committees and other delegate committees supporting any candidate, should only be undertaken when there is far stronger evidence of misconduct than that which has been

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presented in this Complaint. In Federal Election Commission v. Florida Committee, 681 F.2d 1281 (11th Cir. 1982), the Court of Appeals recognized that:

> "A higher degree of scrutiny must attach before courts can compel disclosure of information that may impinge upon First Amendment associational rights."

Federal Election Commission v. Mechanists Non-Particant Political League, 665 F.2d 380 (D.C. Cir.), cert. denied, 454 U.S. 897 (1981). The Court of Appeals followed the Supreme Court's holding in Sweezy v. New Hampshire, 354 U.S. 234, 245 (1957), that:

> "It is particularly important that the exercise of the power of compulsory process be carefully circumscribed when the power of compulsory process tends to impinge upon such highly sensitive areas as freedom of speech or press, freedom of political association and freedom of communication of ideas. . . ."

While the Supreme Court upheld the constitutionality of the $5,000 contribution limit for committees in California Medical Association v. Federal Election Commission, 453 U.S. 182 (1981), that decision does not authorize the Commission to take an expansive view of the affiliation standards which would effectively nullify the opportunity provided under the Federal Election Campaign Act for individuals to form delegate committees in support of their own election as delegates to the National convention.

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IV. UNCERTAINTIES ABOUT THE ROLE OF UNION-RELATED PAC CONTRIBUTIONS TO DELEGATE COMMITTEES SHOULD BE ADDRESSED THROUGH THE COMMISSION'S RULE MAKING POWERS.

An investigation of delegate committees may well create political effects and ramifications on the presidential campaign. Walter Mondale has stated that he will take steps to refund contributions made to disputed delegate committees supporting his presidential campaign. In light of this action by Mr. Mondale, and by the reality that the presidential primary process for the 1984 campaign is at an end, there is no urgency for the Commission to undertake an investigation at this time which may create possible ramifications on the candidates and the general election campaign.

Ironically, the only way independent delegate committees could monitor political action committee contributions to ensure that the aggregate amount contributed by a single union-related PAC did not exceed the Act's limits would be to engage in the type of affiliated activity that the NRWC protests in this complaint. If the Commission believes it necessary, it should resolve the tension between the affiliation rules and the contribution limits through its rulemaking authority. As the law is currently written, individual delegate committees are not responsible for contributions that may be made to and received by other delegate committees. For this reason alone, there is no basis

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for subjecting the delegate committees to a formal investigation into the allegations of this complaint.

CONCLUSION

For the foregoing reasons, the Fourth, Fifth, Eighth, Ninth, Twelfth, Thirteenth and Fourteenth Congressional District Delegates for Mondale Committees, and the South Florida Delegates for Mondale Committee, urges that the Commission should find no reason to believe that a violation under the Federal Election Campaign Act has occurred.

Respectfully submitted,

GREENBERG, TRAURIG, ASKEW,
HOFFMAN, LIPOFF, ROSEN &
QUENTEL, P.A.

By: _____
MARLENE E. SILVERMAN

_____
STUART H. SINGER

3504050171 3

BEFORE THE
FEDERAL ELECTION COMMISSION

NATIONAL RIGHT TO WORK COMMITTEE and RALPH MARTIN HETTINGA, JR., Complainants, v. WALTER F. MONDALE and MONDALE FOR PRESIDENT CAMPAIGN COMMITTEE, et al., Respondents.	MUR 1704 AFFIDAVIT OF GEORGE E. COMERFORD

STATE OF FLORIDA)
) SS:
COUNTY OF DADE)

BEFORE ME, the undersigned authority, personally appeared, GEORGE E. COMERFORD, who, after first being duly sworn, deposes and says that:

1. I am treasurer of the 14th Congressional District Delegates for Mondale Committee.

2. That the 14th Congressional District Delegates for Mondale Committee was formed and has been operated independent of the Mondale for President Committee and of other delegate committees supporting the candidacy of Mr. Mondale.

3. That upon formation, the 14th Congressional District Delegates for Mondale Committee timely registered with the Federal Election Commission pursuant to 11 C.F.R. part 102 and 2 U.S.C. §433, and thereafter complied with 11 C.F.R. part 104 and 2 U.S.C. §434 with respect to reporting contributions and expenditures.

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4. That the only assistance provided by the Mondale campaign staff in the formation of the delegate committees is a memorandum provided by the Mondale for President Committee describing the laws and Commission regulations governing the primary election process to insure that all committees were in strict compliance with these regulations.

5. That the 14th Congressional District Delegates for Mondale Committee has not accepted any contributions from union political action committees or from any other contributors in excess of the $5,000.00 contribution limit established by the Federal Election Campaign Act.

6. That the 14th Congressional District Delegates for Mondale Committee was not at any time subject to control of the Mondale for President Committee or the Mondale Presidential Campaign with respect to any of its operations, including the contents of its campaign materials or the Committees' decisions regarding contributions.

7. That the 14th Congressional District Delegates for Mondale Committee has never hired a Mondale campaign worker who has been laid off.

8. That the 14th Congressional District Delegates for Mondale Committee has never contributed any money to the Mondale for President Committee or to any other delegate committees.

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9. That the 14th Congressional District Delegates for Mondale Committee has not at any time accepted contributions from sources prohibited under the Federal Election Campaign Act or the regulations promulgated thereunder.

10. That the 14th Congressional District Delegates for Mondale Committee has acted in full compliance with the Federal Election Campaign Act, the regulations of Federal Election Commission and has remained an independent organization unaffiliated with the Mondale for President Committee or with other delegate committees supporting Walter Mondale.

11. That the statements made herein are true and correct to the best of my knowledge.

FURTHER AFFIANT SAYETH NAUGHT.

George E. Comerford
GEORGE E. COMERFORD

SWORN TO AND SUBSCRIBED before me this 15 day of June, 1984.

Robert L. Young
NOTARY PUBLIC
State of Florida at Large

My Commission Expires:

Notary Public, State of Florida
My Commission Expires [illegible]

8504050171 5

BEFORE THE
FEDERAL ELECTION COMMISSION

NATIONAL RIGHT TO WORK COMMITTEE and RALPH MARTIN HETTINGA, JR., Complainants, v. WALTER F. MONDALE and MONDALE FOR PRESIDENT CAMPAIGN COMMITTEE, et al., Respondents.	MUR 1704 AFFIDAVIT OF CALVIN D. DEVONEY

STATE OF FLORIDA)
) SS:
COUNTY OF DADE)

BEFORE ME, the undersigned authority, personally appeared, CALVIN D. DEVONEY, who, after first being duly sworn, deposes and says that:

1. I am treasurer of the 4th Congressional District Delegates for Mondale Committee.

2. That the 4th Congressional District Delegates for Mondale Committee was formed and has been operated independent of the Mondale for President Committee and of other delegate committees supporting the candidacy of Mr. Mondale.

3. That upon formation, the 4th Congressional District Delegates for Mondale Committee timely registered with the Federal Election Commission pursuant to 11 C.F.R. part 102 and 2 U.S.C. §433, and thereafter complied with 11 C.F.R. part 104 and 2 U.S.C. §434 with respect to reporting contributions and expenditures.

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4. That the only assistance provided by the Mondale campaign staff in the formation of the delegate committees is a memorandum provided by the Mondale for President Committee describing the laws and Commission regulations governing the primary election process to insure that all committees were in strict compliance with these regulations.

5. That the 4th Congressional District Delegates for Mondale Committee has not accepted any contributions from union political action committees or from any other contributors in excess of the $5,000.00 contribution limit established by the Federal Election Campaign Act.

6. That the 4th Congressional District Delegates for Mondale Committee was not at any time subject to control of the Mondale for President Committee or the Mondale Presidential Campaign with respect to any of its operations, including the contents of its campaign materials or the Committees' decisions regarding contributions.

7. That the 4th Congressional District Delegates for Mondale Committee has never hired a Mondale campaign worker who has been laid off.

8. That the 4th Congressional District Delegates for Mondale Committee has never contributed any money to the Mondale for President Committee or to any other delegate committees.

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9. That the 4th Congressional District Delegates for Mondale Committee has not at any time accepted contributions from sources prohibited under the Federal Election Campaign Act or the regulations promulgated thereunder.

10. That the 4th Congressional District Delegates for Mondale Committee has acted in full compliance with the Federal Election Campaign Act, the regulations of Federal Election Commission and has remained an independent organization unaffiliated with the Mondale for President Committee or with other delegate committees supporting Walter Mondale.

11. That the statements made herein are true and correct to the best of my knowledge.

FURTHER AFFIANT SAYETH NAUGHT.

CALVIN D. DEVONEY

SWORN TO AND SUBSCRIBED before me this 15 day of June, 1984.

NOTARY PUBLIC
State of Florida at Large

My Commission Expires:

Notary Public, State of Florida
My Commission Expires Oct. 11, 1987

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STATEMENT OF DESIGNATION OF COUNSEL

RECEIVED AT THE FEC
84 JUN 7 AM 11:08

MUR 1704

NAME OF COUNSEL: Stuart Singer

ADDRESS: 1401 BRICKELL AVE. PENTHOUSE #1
Miami, Fl. 33101

TELEPHONE: 305 579 0637

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.

6-4-84
Date

George E. Comerford
Signature

RESPONDENT'S NAME: George E. Comerford

ADDRESS: 5944 Western Way
Lake Worth, Fl. 33463

HOME PHONE: 305 965 5944

BUSINESS PHONE: 305 684 4848

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Comerford
Western Way
Poith, Fl. 33463

WEST PALM BEACH, FL 33
4 PM
4 JUN
1984

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Mr Stephen Hoore
FEDERAL ELECTION COMMISSION
1325 K ST. N.W.
WASHINGTON, D.C. 20463

LAW OFFICES

GREENBERG, TRAURIG, ASKEW, HOFFMAN, LIPOFF, ROSEN & QUENTEL, P.A.

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FILED
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GCC# 2476

June 4, 1984

Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20005

Re: Complaint of Americans with Hart, Inc. v. Mondale for President Committee, Inc. filed April 6, 1984, MUR 1667

Dear Commissioners:

This response is filed on behalf of Florida delegate committees which support the candidacy of Walter Mondale in the Fourth, Eighth, Ninth and Fourteenth Congressional Districts and the South Florida Delegates for Mondale Committee and is being filed in opposition to the above-referenced Complaint of Americans with Hart, Inc. filed on April 6, 1984 and subsequently supplemented or amended on April 18, April 27, May 2 and May 22, 1984. In its Complaint, the Hart Committee asserts that delegate committees may not make expenditures for grass roots campaign activities on the terms available to delegates when they act individually. The Hart Committee also requests that the Federal

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Election Commission ("Commission") rule that all committees established by Mondale delegates are affiliated with one another and with the Mondale for President Committee ("MPC"). In this way, the complainant attempts to subject the delegates, along with the MPC, to a common contribution and expenditure limitation.

For the reasons set forth below, we submit that the allegations presented by Americans with Hart, Inc. do not warrant further investigation by the Commission. Initially, we would urge the Commission to require a "high threshold" of proof before commencing such an investigation. Investigations of allegedly improper campaign activities, once launched, attract considerable public attention, notwithstanding the confidentiality provisions of the Federal Election Campaign Act, and may impact upon the presidential campaign itself. Indeed, creating such publicity may be a prime purpose behind the filing of this Complaint. Moreover, such investigations may infringe upon or "chill" the exercise of political expression and associational rights by grass roots groups such as the Florida delegate committees by enmeshing the committees in often protracted, costly and burdensome proceedings. Unless such investigations are carefully limited, they may hinder the very type of local volunteer activity which the Chairman of the Commission has characterized as

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"the essence of healthy election campaigning," Federal Election Campaign Act Amendments of 1979, "Hearings before the Senate Committee on Rules and Administration," 96th Congress, 1st Sess. at 8 (1979), and which Congress has sought to encourage in enacting the coattails provisions of the Federal Election Campaign Act Amendments of 1979. 2 U.S.C. §431(8)(b)(i).[1/] The Commission has also acted to facilitate in the delegate selection process similar campaign activity to that encouraged in the general election by the statutory coattails provision. See FEC Explanation and Justification, 1 Federal Election Campaign Finance Guide (CCH), ¶ 864 at 1561-1567. The Commission's objective would be undermined if full scale investigations are undertaken upon such wide ranging and unconfirmed accusations as those made in the Hart Committee Complaint. Although the Commission has not articulated the level of cause which must exist before proceeding to a formal investigation, at least in the context of grass roots campaign activity, the burden of proof upon a complainant should be substantial.

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1/ Under these provisions, candidates for public office, including presidential candidates, may coordinate grass roots campaigning without violating the Act.

I. THE HART COMMITTEE COMPLAINT FAILS TO MEET THE SPECIFICITY REQUIREMENTS ESTABLISHED BY THE COMMISSION.

The Federal Election Campaign Act, 2 U.S.C. §437G(a)(1), and Commission regulations promulgated thereunder, 11 C.F.R. §111.4, require, inter alia, that a complaint must clearly identify as a respondent each person or entity who is alleged to have committed a violation. 11 C.F.R. §111.4. None of the allegations submitted in the Hart Committee's Complaint, or the supplements thereto, have identified any activities conducted by the Fourth, Eighth, Ninth or Fourteenth Congressional District's Delegates for Mondale Committees or the South Florida Delegates for Mondale group. Indeed the only allegations directed at any Florida committees in the Complaint are vague charges that funds were transferred by New Hampshire committee to several Florida committees and that three Florida committees happened to use the same commercial printer in Hollywood, Florida. Not only do these allegations fail to constitute violations of the Federal Election Campaign Act or regulations promulgated thereunder, but neither the Complaint nor the underlying source identifies the Florida delegate committees which purportedly have received impermissible contributions or have improperly coordinated their activities. This is a fatal defect in the Complaint which should lead the Commission to take no further action at this time. It is precisely such open-ended allegations as these which require far-

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ranging investigations threatening the confidentiality of the investigatory process and interfering with the associational rights of the delegates.

Furthermore, the Hart Complaint is based on inaccurate and undocumented newspaper articles which fail to meet the Commission's policy with regard to the opening of compliance actions on the basis of newspaper accounts. See Commission Memorandum No. 663 (November 15, 1979). That policy requires a news account to be well documented, substantial, and to meet all of the requirements of a complaint in order to constitute a sufficient basis for an enforcement action. The news accounts relied upon in the Hart Complaint do not meet this standard. They are based on speculative and conclusory quotes which do not set forth a substantive statement of facts. For this reason the allegations set forth in the Hart Complaint, particularly those allegations concerning the affiliation of delegate committees with each other and with the MPC, do not create a sufficient basis for further investigation.

The Florida delegate committees filing this response have fully complied with the Federal Election Campaign Act and the Commission's regulations. If and when a complaint is filed which alleges violations by one of the Florida delegate committees filing this response, said committee will welcome the opportunity to demonstrate to the Commission that the allegation is bareless.

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II. THE HART COMPLAINT IS BASED ON AN ERRONEOUS VIEW OF THE COMMISSION'S DELEGATE COMMITTEE REGULATIONS.

A. Delegates, Acting Through A Committee, May Make Expenditures For Volunteer Activities On The Same Terms Available When Delegates Act Individually.

The Commission's Regulations, §110.14, deal with contributions to and expenditures by delegates. The regulations entitle all delegates to spend unlimited amounts for advocating their own selection and for volunteer campaign materials which promote both delegates and their presidential candidate, as long as such materials are used in volunteer activities and do not involve general public advertising. The applicability of these provisions to delegate committees is reflected in the language in these very rules requiring delegates who exercise these rights through committees to register and report with the Commission. The rule also makes clear that committees must observe the Federal Election Campaign Act's limits when making or receiving contributions. The regulation does not, however, establish any limitations on expenditures for delegate committees. It follows that all delegates, whether acting individually or through committees may make the exempt expenditures allowed under §110.14(d)(1). The Commission was certainly aware of the fact that delegate committees would make such expenditures, and would have spelled out such restrictions if they were intended.

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The Commission's summary of rules pertaining to delegate committee expenditures confirms this interpretation. The Commission stated that all expenditures by delegate committees are reportable, and "an expenditure for public political advertising which advocates the selection of a delegate which also refers to a presidential primary candidate is considered either an allocable in-kind contribution or an allocable independent expenditure on behalf of the presidential candidate." FEC Record, December 1983. No other limitation for delegate committee expenditures is stated. Accordingly, delegate committees enjoy the rights afforded to individual delegates to make expenditures advocating their selection in supporting their presidential candidate, as long as such expenditures are limited to volunteer campaign materials. Moreover, any other interpretation would discourage the team campaigning that Congress and the Commission sought to encourage in enacting the coattail provisions enacted in the Federal Election Campaign Act of 1979. 2 U.S.C. §431(8)(b)(xi); 11 C.F.R. §100.7(b)(16).

Neither the Hart Committee Complaint, nor anything in the regulatory history of the regulations at issue suggest any policy reason for treating delegate committees differently than individual delegates. Clearly, the delegate committees are not a "scheme" to evade the contribution and expenditure limitations.

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Under the regulations, individual delegates may raise and spend unlimited amounts on volunteer campaign materials without any disclosure. Second, contributions for individual delegates are not subject to any limitations when made by a political committee and are subject only, to a $25,000 limitation when made by individuals. If the MPC had intended to follow a scheme to evade the contribution and expenditure limitations, as the Hart Committee Complaint suggests, using individual delegates - who need not even register and report, unlike delegate committees - would have been a far easier path.

B. Delegate Committees Are Not Affiliated With Each Other Or With The Mondale For President Committee.

Florida delegate committees represented in this response are independently established autonomous committees who are not affiliated either with other committees operating throughout the state and nation or with the MPC. The standards for affiliation for the purpose of the Act's contribution limitations are set forth at 2 U.S.C. §441A(a)(5). That section states that all contributions made by political committees "established, financed, maintained or controlled by [the same] person" shall be considered to have been made by a single political committee. The Commission has interpreted the general statutory standards set forth in §441A(a)(5) by prescribing five

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factors to be used in determining whether committees are affiliated 11 C.F.R. §100.5(g)(2)(ii): (1) ownership by one committee of a controlling interest in voting shares or securities in another committee; (2) provisions of by-laws, constitutions or other documents by which one committee has the authority, power or ability to direct another committee; (3) the authority, power or ability of one committee to hire, appoint, discipline, discharge, demote or remove or otherwise influence the decision of the officer or members of the other committees; (4) similar patterns of contributions by the committees in questions; and (5) the transfer of funds between committees which represent a substantial portion of the funds of the committees in question.

The allegations in the Hart Committee Complaint, even if accepted on their face, do not satisfy the Commission's affiliation criteria. Moreover, the Florida delegate committees, on whose behalf this response is filed, are not even mentioned. Until the complainant establishes that the affiliation standards have been met, there is no reason for a formal investigation. The Florida delegate committees filing this response were established by delegates independently of the MPC. The formation of the committees, appointment of treasurers, the choice of a committee name, opening of a bank account and other actions were all performed independently by each committee. The delegate com-

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mittees financed their operations through fund raisers and other means and controlled their own activities. The MPC enjoyed no control over the members of the committee.

The Hart Complaint strives to create an aura of impropriety because delegate campaign flyers emphasize the candidate other then the delegates and because the MPC provided delegate committees with legal advice pertaining to federal election law. Obviously, voters will vote for delegates who support the presidential candidate they favor and delegate campaigning naturally focuses on the candidate the particular delegate supports. Furthermore, legal advice on commission regulations is not a basis upon which the Commission may find that delegate committees have affiliated themselves with the national campaign. See 2 U.S.C. §431(8)(B)(ix).

III. COMMISSION REGULATIONS SHOULD BE INTERPRETED IN LIGHT OF THE DELEGATES CONSTITUTIONAL RIGHTS TO POLITICAL ASSOCIATION THROUGH COMMITTEES.

The FEC is being asked to investigate committee activities which are fully subject to First Amendment protection. The organization of groups to participate in the political process lies at the core of the First Amendment rights of expression and association. As Chief Justice Burger stated for the Supreme Court in Citizens Against Rent Control v. City of Berkeley, 454 U.S. 290, 294 (1982):

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> "[T]he practice of persons sharing common views banning together to achieve a common end is deeply embedded in the American political process. . . . The tradition of volunteer committees for collective action has manifested itself in myriad community and public activities; in the political process, it can focus on a candidate or on a ballot measure. Its value is that by collective effort, individuals can make their views known when, individually, their voices would be faint or lost."

Any interpretation of Commission regulations, or for that matter, any direct regulation either by this Commission or even by the Congress which infringed on the rights of individual delegates to campaign together through delegate committees would be constitutionally suspect:

> Effective advocacy of both public and private points of view, particularly controversial ones, is undeniably enhanced by group association, as this Court has more than once recognized by remarking upon the close nexus between the freedoms of speech and assembly.

NAACP v. Alabama, 357 U.S. 449, 460 (1958); Buckley v. Valeo, 424 U.S. 1, 14 (1976); Citizens Against Rent Control v. City of Berkeley, 454 U.S. at 294; Federal Election Commission v. Florida for Kennedy Committee, 681 F.2d 1281, 1284-1285 (11th Cir. 1982). In Buckley v. Valeo, the Supreme Court made clear that:

> "The First Amendment protects political association, as well as political expression. The constitutional right of association explicated in NAACP v. Alabama, 357 U.S. 449 (1958), stems from the Court's recognition that "effective advocacy of both public and private points of view, particularly controversial ones, is undeniably enhanced by group association.' Subsequent decisions have made clear that the First and Fourteenth Amendments guarantee 'freedom to associate with others for the common advancement of political beliefs and ideas,' a freedom that encompasses 'the right to associate with the political party of one's choice.' Kusper v. Pontikes, 414 U.S. 51, 56 (1973), quoted in Cousins v. Wigoda, 419 U.S. 477, 487 (1975)."

Because of the importance of free expression and association rights in the context of political campaigns, the Supreme Court in Buckley invalidated limitations on campaign expenditures, and upheld restrictions on contributions only because they were carefully limited to the single interest that the court found legitimate in this area: the perception of undue influence created by large contributions to a candidate.[2/]

Activities by a political party in the primary process are even further insulated from government intrusion. In Democratic

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2/ As the Supreme Court has subsequently stated, "Buckley identified a single narrow exception to the rule that limits on political activity were contrary to the First Amendment. The exception relates to the perception of undue influence of large contributions to a candidate." Citizens Against Rent Control v. City of Berkeley, 454 U.S. at 297 (emphasis in original).

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Party of the United States v. Wisconsin, 450 U.S. 119, the court held that members of the National Democratic Party's associational rights to determine who could participate in the processes leading to the selection of delegates at a national convention could not be limited by Wisconsin's interests in forcing the National Party to honor primary results. In so holding, the court followed its earlier holding in Cousins v. Wigoda, 419 U.S. 477, that state law did not have primacy over national political party's rules in determination of the qualifications and eligibility of delegates to the National Party's Convention. The court stated that "Illinois' interest in protecting the integrity of its electoral process cannot be compelling in the context of the selection of delegates to the National Party Convention." Id. at 491. The Cousins court relied upon the principle that "the National Democratic Party and its adherents enjoy a constitutionally protected right of political association." Id. at 487. For the reasons articulated in these cases, the Commission should be particularly hesitant before launching investigations into primary campaign activities which are, after all, essentially matters for the Democratic Party to resolve.

The constitutional implications of any commission regulation of political activities by delegate committees are clear. First,

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the constitutionally permissible scope of any regulation of delegate committee activities is limited by the Supreme Court's decision in Buckley to the single possibility of the perception of undue influence through contributions to a candidate. Conducting a full scale investigation on other issues is pointless, given the Supreme Court's Buckley ruling. Second, the investigation itself raises significant constitutional questions. By forcing the disclosure of committee workings, and enmeshing the committees in an investigation, the Commission risks infringing and chilling the rights of delegates to form committees to advance their cause. An investigation into the activities of the Florida Mondale Delegate Committees and other delegate committees supporting any candidate, should only be undertaken when there is far stronger evidence of misconduct than that which has been presented in this Complaint. In Federal Election Commission v. Florida Committee, 681 F.2d 1281 (11th Cir. 1982), the Court of Appeals recognized that:

> "A higher degree of scrutiny must attach before courts can compel disclosure of information that may impinge upon First Amendment associational rights."

Federal Election Commission v. Mechanists Non-Particant Political League, 665 F.2d 380 (D.C. Cir.), cert. denied, 454 U.S. 897 (1981). The Court of Appeals followed the Supreme Court's

holding in Sweezy v. New Hampshire, 354 U.S. 234, 245 (1957), that:

> "It is particularly important that the exercise of the power of compulsory process be carefully circumscribed when the power of compulsory process tends to impinge upon such highly sensitive areas as freedom of speech or press, freedom of political association and freedom of communication of ideas. . . ."

Third, cast in its best light, the Hart Complaint only points to an ambiguity in the Commission's regulations as to whether delegates may make expenditures as delegate committees, as well as individually. It is a well established constitutional principle that, in cases of statutory ambiguity, a statute should be construed to avoid creating constitutional problems. "If the interpretation complained of 'presents a significant risk that the First Amendment interest will be infringed,' any ambiguity in statute is construed in the manner to avoid such constitutional problems. Federal Election Commission v. Florida for Kennedy Committee, 681 F.2d at 1287. See also Rescue Army v. Municipal Court, 331 U.S. 549 (1947); Ashwander v. T.V.A., 297 U.S. 288, 345 (1936) (Brandeis, J. concurring). The same principle should apply with equal force to the Commission's determinations of whether ambiguity in its regulations should be construed in a manner which is restrictive of political activity protected by the First amendment.

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IV. UNCERTAINTIES ABOUT THE ROLE OF DELEGATE COMMITTEES IN PRIMARY CAMPAIGNS SHOULD BE ADDRESSED THROUGH THE COMMISSION'S RULE MAKING POWERS.

An investigation of delegate committees may well create political effects and ramifications on the presidential campaign. Walter Mondale has stated that he will take steps to refund contributions made to disputed delegate committees supporting his presidential campaign and count monies spent by the committee against overall federal spending limits. In light of these actions by Mr. Mondale, and by the reality that the presidential primary process for the 1984 campaign is at an end, there is no urgency for the Commission to undertake an investigation at this time which may create possible ramifications on the candidates and the election campaign. If the Commission believes there are ambiguities in the delegate regulations which require clarification, the Commission should do so through its rule making authority. In this manner, the Commission can more fully address the broader policy questions at stake without prejudicing the rights and campaigns of any candidate in this election, and without intruding upon the valued rights of free expression and association protected by the United States Constitution.

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CONCLUSION

For the foregoing reasons, the Fourth, Eighth, Ninth and Fourteenth Congressional District Delegates for Mondale Com-

mittees, and the South Florida Delegates for Mondale Group, urges that the Commission should find no reason to believe that a violation under the Federal Election Campaign Act has occurred.

Respectfully submitted,

GREENBERG, TRAURIG, ASKEW,
HOFFMAN, LIPOFF, ROSEN &
QUENTEL, P.A.

By: Marlene K. Silverman
MARLENE K. SILVERMAN

Stuart H. Singer
STUART H. SINGER

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May 24, 1984

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FEDERAL EXPRESS

Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20005

Re: Complaint of Americans with Hart, Inc. v. Mondale for President Committee, Inc., MUR-1667

Dear Commissioners:

This firm has been retained by Mondale delegate committees in the Eighth, Ninth and Fourteenth Congressional Districts of Florida in connection with the above-referenced Complaint alleging that the committees may have violated certain sections of the Federal Election Campaign Act. Notification of the Complaint was received by the delegate committee treasurers on May 14, 1984, thereby making a response to the Complaint due no later than May 29, 1984. In order that we may investigate the allegations made in the Complaint and prepare a useful response on behalf of the delegate committees, we respectfully request a ten (10) day extension to the time for filing a response. In support of our request for an extension, we note the following:

1. This firm was not retained as counsel in this matter by any of the delegate committees until May 22, 1984, and did not receive a copy of the Complaint or the three supplemental filings until May 23, 1984. Particularly with the upcoming Memorial Day weekend, there is insufficient time to prepare an adequate response by May 29.

2. We anticipate being retained within the next few days by other Florida delegate committees which support Walter Mondale and intend to file a joint response on behalf of all such committees in connection with this matter.

3. The Complaint and the three supplements to it present broad ranging allegations and novel legal questions which require us to undertake both a certain amount of factual investigation, as well as analysis of the relevant legal issues presented. It is immediately clear that this Complaint poses a serious challenge to the role of delegate committees in the Presidential campaign process and it is important that the delegate committees have a meaningful opportunity to respond to these allegations.

For these reasons, we respectfully request that the Commission grant an extension, allowing us to file a response in this matter no later than June 8, 1984.

Very truly yours,

Stuart H. Singer

STUART H. SINGER

SHS:wp

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

George E. Comerford, Treasurer
14th C D For Mondale
5844 Western Way
Lake Worth, FL 33463

Re: MUR 1667

Dear Mr. Comerford:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against the committee and you, as treasurer, in connection with this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you intend to be represented by counsel in this matter please advise the Commission by 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.

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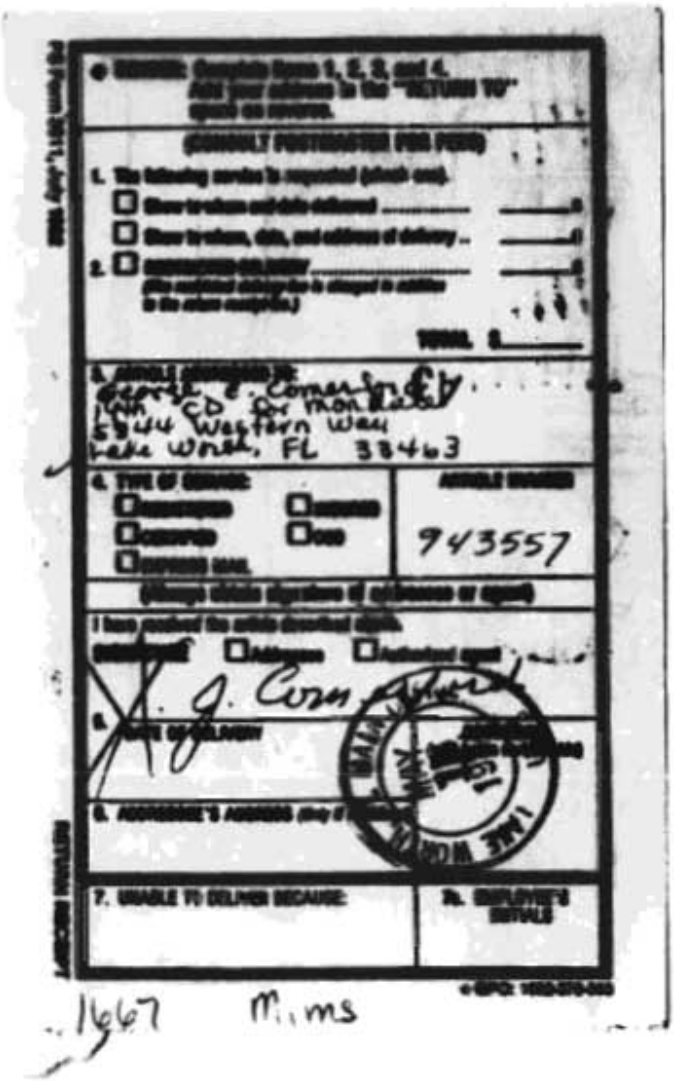
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

Enclosures
1. Complaint
2. Procedures
3. Designation of Counsel Statement



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MARK SCHWIMMER
MARTIN B. SHAPIRO
MARLENE K. SILVERMAN
STUART H. SINGER
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DANIEL A. SUCHMAN
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YOLANDA MELLON TAMAYO
ROBERT H. TRAURIG
STANLEY H. WAKSHLAG
JONATHAN H. WARNER
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WRITER'S DIRECT NO.:

FEDERAL EXPRESS

June 25, 1984

Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20005

Re: Complaint of the National Right to Work Committee, et al v. Walter F. Mondale and Mondale for President Campaign Committee, et al, MUR-1704

Dear Commissioners:

Please accept the enclosed Affidavits as a supplemental filing to the response that was filed on behalf of certain Florida delegate committees in the above-referenced matter.

Very truly yours,

STUART H. SINGER

SHS/ch
Enc.

8504017443

BEFORE THE
FEDERAL ELECTION COMMISSION

NATIONAL RIGHT TO WORK COMMITTEE and RALPH MARTIN HETTINGA, JR., Complainants, v. WALTER F. MONDALE and MONDALE FOR PRESIDENT CAMPAIGN COMMITTEE, et al., Respondents.	MUR 1704 AFFIDAVIT OF ~~BRENDA~~ MELINDA GREINER

STATE OF FLORIDA)
) SS:
COUNTY OF DADE)

BEFORE ME, the undersigned authority, personally appeared, ~~BRENDA~~ MELINDA GREINER, who, after first being duly sworn, deposes and says that:

1. I am treasurer of the 13th Congressional District Delegates for Mondale Committee.

2. That the 13th Congressional District Delegates for Mondale Committee was formed and has been operated independent of the Mondale for President Committee and of other delegate committees supporting the candidacy of Mr. Mondale. (to the best of my personal knowledge)

3. That upon formation, the 13th Congressional District Delegates for Mondale Committee timely registered with the Federal Election Commission pursuant to 11 C.F.R. part 102 and 2 U.S.C. §433, and thereafter complied with 11 C.F.R. part 104 and 2 U.S.C. §434 with respect to reporting contributions and expenditures. (to the best of my personal knowledge)

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4. That the only assistance provided by the Mondale campaign staff in the formation of the delegate committees is a memorandum provided by the Mondale for President Committee describing the laws and Commission regulations governing the primary election process to insure that all committees were in strict compliance with these regulations.

5. That the 13th Congressional District Delegates for Mondale Committee has not accepted any contributions from union political action committees or from any other contributors in excess of the $5,000.00 contribution limit established by the Federal Election Campaign Act.

6. That the 13th Congressional District Delegates for Mondale Committee was not at any time subject to control of the Mondale for President Committee or the Mondale Presidential Campaign with respect to any of its operations, including the contents of its campaign materials or the Committees' decisions regarding contributions. (to the best of my personal knowledge.)

7. That the 13th Congressional District Delegates for Mondale Committee has never hired a Mondale campaign worker who has been laid off. (to the best of my personal knowledge)

8. That the 13th Congressional District Delegates for Mondale Committee has never contributed any money to the Mondale for President Committee or to any other delegate committees.

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9. That the 13th Congressional District Delegates for Mondale Committee has not at any time accepted contributions from sources prohibited under the Federal Election Campaign Act or the regulations promulgated thereunder. (to the best of my personal knowledge.)

10. That the 13th Congressional District Delegates for Mondale Committee has acted in full compliance with the Federal Election Campaign Act, the regulations of Federal Election Commission and has remained an independent organization unaffiliated with the Mondale for President Committee or with other delegate committees supporting Walter Mondale. (to the best of my personal knowledge.)

11. That the statements made herein are true and correct to the best of my knowledge.

12. (See below)

FURTHER AFFIANT SAYETH NAUGHT.

Melinda Greiner
LINDA GREINER

SWORN TO AND SUBSCRIBED before me this 20th day of June, 1984.

NOTARY PUBLIC
State of Florida at Large

My Commission Expires:

Notary Public, State of Florida
My Commission Expires July 15, 1987

12. As Treasurer, my duties included only setting up an account, cashing checks, paying bills, keeping accurate records and filing reports.

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LAW OFFICES

GREENBERG, TRAURIG, ASKEW, HOFFMAN, LIPOFF, ROSEN & QUENTEL, P.A.

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REUBIN O'D. ASKEW
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STEVEN A. LANDY
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JUAN P. LOUMIET
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FEC #3728

June 19, 1984

8504050174 7

Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20005

Re: Complaint of the National Right to Work Committee, et al. v. Walter F. Mondale and Mondale For President Campaign Committee, et al., MUR 1704

Dear Commissioners:

This response is filed on behalf of Florida Delegate Committees which support the candidacy of Walter Mondale in the Fourth, Fifth, Eighth, Ninth, Northern Twelfth, Thirteenth and Fourteenth Congressional Districts and the South Florida Delegates for Mondale Committee and is being filed in opposition to the above-referenced complaint of the National Right to Work Committee and Ralph Martin Hettinga, Jr. filed on May 21, 1984. In its complaint, the National Right To Work Committee ("NRWC") asserts that a number of union-related political action committees have

evaded the contribution limits of the Federal Election Campaign Act by making contributions to delegate committees which NRWMC assets are affiliated with one another and with the Mondale for President Committee ("MPC"). The complainant requests that the Commission hold the independent Mondale delegate committees throughout the country, along with the MPC, to a single common contribution limitation.

For the reasons set forth below, we submit that the allegations presented by the complainant do not warrant further investigation by the Commission. Initially, we would urge the Commission to require a "high threshold" of proof before commencing such an investigation. Investigations of allegedly improper campaign activities, once launched, attract considerable public attention, notwithstanding the confidentiality provisions of the Federal Election Campaign Act, and may impact upon the presidential campaign itself. Indeed, creating such publicity may be a prime purpose behind the filing of this Complaint. Moreover, such investigations may infringe upon or "chill" the exercise of political expression and associational rights by grass roots groups such as the Florida delegate committees by enmeshing the committees in often protracted, costly and burdensome proceedings. Unless such investigations are carefully limited, they may hinder the very type of local volunteer activity which the Chair-

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man of the Commission has characterized as "the essence of healthy election campaigning," Federal Election Campaign Act Amendments of 1979, "Hearings before the Senate Committee on Rules and Administration," 96th Congress, 1st Sess. at 8 (1979), and which Congress has sought to encourage in enacting the coattails provisions of the Federal Election Campaign Act Amendments of 1979. 2 U.S.C. §431(8)(b)(i).[1/] The Commission has also acted to facilitate in the delegate selection process similar campaign activity to that encouraged in the general election by the statutory coattails provision. See FEC Explanation and Justification, 1 Federal Election Campaign Finance Guide (CCH), ¶ 864 at 1561-1567. The Commission's objective would be undermined if full scale investigations are undertaken upon such wide ranging and unconfirmed accusations of affiliation as those made in the NRWC Complaint. Although the Commission has not articulated the level of cause which must exist before proceeding to a formal investigation, at least in the context of grass roots campaign activity, the burden of proof upon a complainant should be substantial.

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1/ Under these provisions, candidates for public office, including presidential candidates, may coordinate grass roots campaigning without violating the Act.

I. THE FEDERAL ELECTION CAMPAIGN ACT DOES NOT PROHIBIT "AFFILIATION" AMONG COMMITTEES RECEIVING CONTRIBUTIONS.

The NRWC Complaint is predicated on 2 U.S.C. § 441a(a)(5), which states that all contributions made by political committees "established, financed, maintained, or controlled by [the same] person" shall be considered to have been made by a single political committee. NRWC, however, is not alleging affiliation among the contributing sources but rather among the recipient delegate committees. Neither 2 U.S.C. § 441a(a)(5), nor any other provision of the Act authorizes the Commission to treat contributions made to delegate committees as contributions made to the candidate. That the Commission should not assume such authority is implicit from § 441a(a)(7)(A) which states only that contributions made to a political committee "authorized by such candidate to accept contributions on his behalf" shall be considered as contributions made to the candidate. If Congress had intended to consider other contributions -- such as those involved here -- as contributions to the candidate, it would have so legislated.

This interpretation is supported by § 441a(a)(5)(A) which states that the "affiliation" provisions of that section do not limit "transfers between political committees of funds raised through joint fund raising efforts." Moreover, § 441a(a)(4) stipulates that the limitations on contributions "do not apply to transfers between and among political committees which are

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national, state, district or local committees (including any subordinate committee thereof) of the same political party," although clearly the activities of such committees are closely coordinated. The Supreme Court gave related provisions of the Act, allowing such transfers for Senatorial campaigns, an expansive interpretation in upholding the Commission's interpretation in Federal Election Comm. v. Democratic Senatorial Campaign Committee, 454 U.S. 27 (1981).

Not only did Congress not authorize the Commission to take the action complainant requests, but there is an obvious reason why delegate committees should not be subject to single contribution limits. Unless the committees do in fact coordinate their actions and exchange records, there is no way one delegate committee can determine whether a given contribution tendered to it violates the Act's contribution limits.

II. FLORIDA DELEGATE COMMITTEES ARE NOT AFFILIATED WITH EACH OTHER OR WITH THE MONDALE FOR PRESIDENT COMMITTEE.

Florida delegate committees filing this response are independently established autonomous committees who are not affiliated either with other committees operating throughout the state and nation or with the MPC. Thus, even if the standards for affiliation for the purpose of the Act's contribution limitations set forth at 2 U.S.C. § 441a(a)(5) are relevant to this com-

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plaint, the Florida delegate committees have not been so affiliated. The Commission has interpreted the general statutory standards set forth in § 441a(a)(5) by prescribing five factors to be used in determining whether committees are affiliated 11 C.F.R. § 100.5(g)(2)(ii): (1) ownership by one committee of a controlling interest in voting shares or securities in another committee; (2) provisions of by-laws, constitutions or other documents by which one committee has the authority, power or ability to direct another committee; (3) the authority, power or ability of one committee to hire, appoint, discipline, discharge, demote or remove or otherwise influence the decision of the officer or members of the other committees; (4) similar patterns of contributions by the committees in questions; and (5) the transfer of funds between committees which represent a substantial portion of the funds of the committees in question.

The allegations in the NRWC Complaint, even if accepted on their face, do not satisfy the Commission's affiliation criteria. Moreover, the Florida delegate committees on whose behalf this response is filed are not specifically mentioned by the allegations concerning affiliation. Until the complainant establishes that the affiliation standards have been met, there is no reason for a formal investigation. As documented by the attached

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affidavits,[2] the Florida delegate committees filing this response were established by delegates independently of the MPC. The formation of the committees, appointment of treasurers, the choice of a committee name, opening of a bank account and other actions were all performed independently by each committee. The delegate committees financed their operations through fund raisers and other means and controlled their own activities. The MPC enjoyed no control over the members of the committee.

Relying on various news accounts,[3] the complaint asserts that the national Modale staff "instructed" delegate committees on how to organize and operate, that Mondale staff were transfer-

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[2] Supporting affidavits on behalf of other committees will be forwarded as soon as possible as a supplemental filing to this response.

[3] For the most part, the news accounts relied upon in the complaint failed to meet the Commission's policy with regard to the opening of compliance actions on the basis of newspaper accounts. See Commission Memorandum No. 663 November 15, 1979. That policy requires a news account to be well documented, substantial, and to meet all of the requirements of a complaint in order to constitute a sufficient basis for an enforcement action. The news accounts relied upon in the NWRC complaint do not meet this standard. They are based on speculative and conclusory quotes which do not set forth a substantive statement of facts. For this reason, the allegations concerning the affiliation of delegate committees with each other and with the MPC based on newspaper articles do not create a sufficient basis for further investigation.

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red to the delegate committees, that committees declined PAC contributions at Mr. Mondale's request, that the MPC's office of legal counsel was made available to advise delegate committees, that funds were transferred from a delegate committee in one state to a sister group in another, that certain registration statements for different committees were purportedly written by the same person and mailed in envelopes typed on the same typewriter and reported joint spending at the same print shops, and that delegate committees started disbanding after Walter Mondale requested them to do so. Each of these allegations is addressed below, and the response to these allegations is supported by sworn affidavits from the delegate committee treasurers.

1. The only assistance provided by the Mondale staff in the formation of the delegate committees filing this response was a memorandum provided by the MPC describing the laws and commission regulations governing the primary election process to insure that all committees were in strict compliance with these regulations. The provision of such legal assistance is expressly authorized by 2 U.S.C. § 431(8)(B)(ix).

2. The Florida delegate committees represented herein have not hired any MPC campaign workers.

3. Mr. Mondale's decision to request delegate committees supporting his candidacy not to accept PAC contributions hardly

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can be the basis for a finding of an affiliation among the committees and the MPC. In the first place, there is nothing whatever to suggest that the committees followed Mr. Mondale's direction in this regard. In Florida, at least, the primary had already been conducted at this time and contributions from any source, including political action committees, were no longer needed. A committee's decision not to accept further contributions hardly demonstrates that the delegate committees actions were being orchestrated by Mr. Mondale or the MPC. To the contrary, the delegate committees' earlier decisions to accept limited contributions from political action committee sources while Mr. Mondale had decided not to accept such contributions for the purposes of his own campaign illustrates the independence of decisionmaking between the MPC and the delegate committees.

4. The availability of legal advice to the delegate committees is not a basis on which affiliation may be found. Indeed, even the provision of legal advice regarding Commission regulations is not a basis upon which the Commission may find the delegate committees to have affiliated themselves with the national campaign. See 2 U.S.C. § 431(8)(B)(ix).

5. The delegate committees represented in this response have not contributed any money to the MPC or to any other delegate committees.

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6. The allegations concerning the use of a similar typewriter or printer, even if true, hardly support a finding of affiliation as set forth under the Commission's regulations.

7. The fact that some delegate committees disbanded after the purpose for which they were created -- the primary elections -- concluded is hardly surprising and is not indicative of any affiliation among the committees or affiliation with the national campaign.

In sum, the alleged coordination and control of the delegate committees by the Mondale campaign has not been established, at least with respect to the Florida delegate committees filing this response. Furthermore, the private investigatory reports discussed on page 6 of the complaint do not identify any of the Florida delegate committees filing this response as having been involved in any allegedly "affiliated" activity. For these reasons, there is no basis for concluding that the Mondale delegate committees are affiliates of the Mondale campaign and share a single limit on contributions that they may receive from any one source for the election.

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III. COMMISSION INTERPRETATIONS SHOULD BE INTERPRETED IN LIGHT OF THE DELEGATES' CONSTITUTIONAL RIGHTS TO POLITICAL ASSOCIATION THROUGH COMMITTEES.

The FEC is being asked to investigate committee activities which are fully subject to First Amendment protection. The organization of groups to participate in the political process lies at the core of the First Amendment rights of expression and association. As Chief Justice Burger stated for the Supreme Court in Citizens Against Rent Control v. City of Berkeley, 454 U.S. 290, 294 (1982):

> "[T]he practice of persons sharing common views banning together to achieve a common end is deeply embedded in the American political process. . . . The tradition of volunteer committees for collective action has manifested itself in myriad community and public activities; in the political process, it can focus on a candidate or on a ballot measure. Its value is that by collective effort, individuals can make their views known when, individually, their voices would be faint or lost."

Any interpretation of Commission regulations, or for that matter, any direct regulation either by this Commission or even by the Congress which infringed on the rights of individual delegates to campaign together through delegate committees would be constitutionally suspect:

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> Effective advocacy of both public and private points of view, particularly controversial ones, is undeniably enhanced by group association, as this Court has more than once recognized by remarking upon the close nexus between the freedoms of speech and assembly.

NAACP v. Alabama, 357 U.S. 449, 460 (1958); Buckley v. Valeo, 424 U.S. 1, 14 (1976); Citizens Against Rent Control v. City of Berkeley, 454 U.S. at 294; Federal Election Commission v. Florida for Kennedy Committee, 681 F.2d 1281, 1284-1285 (11th Cir. 1982). In Buckley v. Valeo, the Supreme Court made clear that:

> "The First Amendment protects political association, as well as political expression. The constitutional right of association explicated in NAACP v. Alabama, 357 U.S. 449 (1958), stems from the Court's recognition that "effective advocacy of both public and private points of view, particularly controversial ones, is undeniably enhanced by group association.' Subsequent decisions have made clear that the First and Fourteenth Amendments guarantee 'freedom to associate with others for the common advancement of political beliefs and ideas,' a freedom that encompasses 'the right to associate with the political party of one's choice.' Kusper v. Pontikes, 414 U.S. 51, 56 (1973), quoted in Cousins v. Wigoda, 419 U.S. 477, 487 (1975)."

Because of the importance of free expression and association rights in the context of political campaigns, the Supreme Court in Buckley invalidated limitations on campaign expenditures, and upheld restrictions on contributions only because they were care-

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fully limited to the single interest that the court found legitimate in this area: the perception of undue influence created by large contributions to a candidate.[4/]

Activities by a political party in the primary process are even further insulated from government intrusion. In Democratic Party of the United States v. Wisconsin, 450 U.S. 119, the court held that members of the National Democratic Party's associational rights to determine who could participate in the processes leading to the selection of delegates at a national convention could not be limited by Wisconsin's interests in forcing the National Party to honor primary results. In so holding, the court followed its earlier holding in Cousins v. Wigoda, 419 U.S. 477, that state law did not have primacy over national political party's rules in determination of the qualifications and eligibility of delegates to the National Party's Convention. The court stated that "Illinois' interest in protecting the integrity of its electoral process cannot be compelling in the context of the selection of delegates to the National Party Convention."

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4/ As the Supreme Court has subsequently stated, "Buckley identified a single narrow exception to the rule that limits on political activity were contrary to the First Amendment. The exception relates to the perception of undue influence of large contributions to a candidate." Citizens Against Rent Control v. City of Berkeley, 454 U.S. at 297 (emphasis in original).

Id. at 491. The Cousins court relied upon the principle that "the National Democratic Party and its adherents enjoy a constitutionally protected right of political association." Id. at 487. For the reasons articulated in these cases, the Commission should be particularly hesitant before launching investigations into primary campaign activities which are, after all, essentially matters for the Democratic Party to resolve.

The constitutional implications of any commission regulation of political activities by delegate committees are clear. First, the constitutionally permissible scope of any regulation of delegate committee activities is limited by the Supreme Court's decision in Buckley to the single possibility of the perception of undue influence through contributions to a candidate. Conducting a full scale investigation on other issues is pointless, given the Supreme Court's Buckley ruling. Second, the investigation itself raises significant constitutional questions. By forcing the disclosure of committee workings, and enmeshing the committees in an investigation, the Commission risks infringing and chilling the rights of delegates to form committees to advance their cause. An investigation into the activities of the Florida Mondale Delegate Committees and other delegate committees supporting any candidate, should only be undertaken when there is far stronger evidence of misconduct than that which has been

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presented in this Complaint. In Federal Election Commission v. Florida Committee, 681 F.2d 1281 (11th Cir. 1982), the Court of Appeals recognized that:

> "A higher degree of scrutiny must attach before courts can compel disclosure of information that may impinge upon First Amendment associational rights."

Federal Election Commission v. Mechanists Non-Particant Political League, 665 F.2d 380 (D.C. Cir.), cert. denied, 454 U.S. 897 (1981). The Court of Appeals followed the Supreme Court's holding in Sweezy v. New Hampshire, 354 U.S. 234, 245 (1957), that:

> "It is particularly important that the exercise of the power of compulsory process be carefully circumscribed when the power of compulsory process tends to impinge upon such highly sensitive areas as freedom of speech or press, freedom of political association and freedom of communication of ideas. . . ."

While the Supreme Court upheld the constitutionality of the $5,000 contribution limit for committees in California Medical Association v. Federal Election Commission, 453 U.S. 182 (1981), that decision does not authorize the Commission to take an expansive view of the affiliation standards which would effectively nullify the opportunity provided under the Federal Election Campaign Act for individuals to form delegate committees in support of their own election as delegates to the National convention.

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IV. UNCERTAINTIES ABOUT THE ROLE OF UNION-RELATED PAC CONTRIBUTIONS TO DELEGATE COMMITTEES SHOULD BE ADDRESSED THROUGH THE COMMISSION'S RULE MAKING POWERS.

An investigation of delegate committees may well create political effects and ramifications on the presidential campaign. Walter Mondale has stated that he will take steps to refund contributions made to disputed delegate committees supporting his presidential campaign. In light of this action by Mr. Mondale, and by the reality that the presidential primary process for the 1984 campaign is at an end, there is no urgency for the Commission to undertake an investigation at this time which may create possible ramifications on the candidates and the general election campaign.

Ironically, the only way independent delegate committees could monitor political action committee contributions to ensure that the aggregate amount contributed by a single union-related PAC did not exceed the Act's limits would be to engage in the type of affiliated activity that the NRWC protests in this complaint. If the Commission believes it necessary, it should resolve the tension between the affiliation rules and the contribution limits through its rulemaking authority. As the law is currently written, individual delegate committees are not responsible for contributions that may be made to and received by other delegate committees. For this reason alone, there is no basis

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for subjecting the delegate committees to a formal investigation into the allegations of this complaint.

CONCLUSION

For the foregoing reasons, the Fourth, Fifth, Eighth, Ninth, Twelfth, Thirteenth and Fourteenth Congressional District Delegates for Mondale Committees, and the South Florida Delegates for Mondale Committee, urges that the Commission should find no reason to believe that a violation under the Federal Election Campaign Act has occurred.

Respectfully submitted,

GREENBERG, TRAURIG, ASKEW,
HOFFMAN, LIPOFF, ROSEN &
QUENTEL, P.A.

By: Marlene K. Silverman
MARLENE K. SILVERMAN

Stuart H. Singer
STUART H. SINGER

8504050176 3

BEFORE THE
FEDERAL ELECTION COMMISSION

NATIONAL RIGHT TO WORK COMMITTEE and RALPH MARTIN HETTINGA, JR., Complainants, v. WALTER F. MONDALE and MONDALE FOR PRESIDENT CAMPAIGN COMMITTEE, et al., Respondents.	MUR 1704 AFFIDAVIT OF GEORGE E. COMERFORD

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STATE OF FLORIDA)
) SS:
COUNTY OF DADE)

BEFORE ME, the undersigned authority, personally appeared, GEORGE E. COMERFORD, who, after first being duly sworn, deposes and says that:

1. I am treasurer of the 14th Congressional District Delegates for Mondale Committee.

2. That the 14th Congressional District Delegates for Mondale Committee was formed and has been operated independent of the Mondale for President Committee and of other delegate committees supporting the candidacy of Mr. Mondale.

3. That upon formation, the 14th Congressional District Delegates for Mondale Committee timely registered with the Federal Election Commission pursuant to 11 C.F.R. part 102 and 2 U.S.C. §433, and thereafter complied with 11 C.F.R. part 104 and 2 U.S.C. §434 with respect to reporting contributions and expenditures.

4. That the only assistance provided by the Mondale campaign staff in the formation of the delegate committees is a memorandum provided by the Mondale for President Committee describing the laws and Commission regulations governing the primary election process to insure that all committees were in strict compliance with these regulations.

5. That the 14th Congressional District Delegates for Mondale Committee has not accepted any contributions from union political action committees or from any other contributors in excess of the $5,000.00 contribution limit established by the Federal Election Campaign Act.

6. That the 14th Congressional District Delegates for Mondale Committee was not at any time subject to control of the Mondale for President Committee or the Mondale Presidential Campaign with respect to any of its operations, including the contents of its campaign materials or the Committees' decisions regarding contributions.

7. That the 14th Congressional District Delegates for Mondale Committee has never hired a Mondale campaign worker who has been laid off.

8. That the 14th Congressional District Delegates for Mondale Committee has never contributed any money to the Mondale for President Committee or to any other delegate committees.

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9. That the 14th Congressional District Delegates for Mondale Committee has not at any time accepted contributions from sources prohibited under the Federal Election Campaign Act or the regulations promulgated thereunder.

10. That the 14th Congressional District Delegates for Mondale Committee has acted in full compliance with the Federal Election Campaign Act, the regulations of Federal Election Commission and has remained an independent organization unaffiliated with the Mondale for President Committee or with other delegate committees supporting Walter Mondale.

11. That the statements made herein are true and correct to the best of my knowledge.

FURTHER AFFIANT SAYETH NAUGHT.

George E. Comerford
GEORGE E. COMERFORD

SWORN TO AND SUBSCRIBED before me this 15 day of June, 1984.

Robert L. Mann
NOTARY PUBLIC
State of Florida at Large

My Commission Expires:

Notary Public, State of Florida
My Commission Expires ...

8504050017665

BEFORE THE
FEDERAL ELECTION COMMISSION

NATIONAL RIGHT TO WORK COMMITTEE and RALPH MARTIN HETTINGA, JR., Complainants, v. WALTER F. MONDALE and MONDALE FOR PRESIDENT CAMPAIGN COMMITTEE, et al., Respondents.	MUR 1704 AFFIDAVIT OF CALVIN D. DEVONEY

STATE OF FLORIDA)
) SS:
COUNTY OF DADE)

BEFORE ME, the undersigned authority, personally appeared, CALVIN D. DEVONEY, who, after first being duly sworn, deposes and says that:

1. I am treasurer of the 4th Congressional District Delegates for Mondale Committee.

2. That the 4th Congressional District Delegates for Mondale Committee was formed and has been operated independent of the Mondale for President Committee and of other delegate committees supporting the candidacy of Mr. Mondale.

3. That upon formation, the 4th Congressional District Delegates for Mondale Committee timely registered with the Federal Election Commission pursuant to 11 C.F.R. part 102 and 2 U.S.C. §433, and thereafter complied with 11 C.F.R. part 104 and 2 U.S.C. §434 with respect to reporting contributions and expenditures.

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4. That the only assistance provided by the Mondale campaign staff in the formation of the delegate committees is a memorandum provided by the Mondale for President Committee describing the laws and Commission regulations governing the primary election process to insure that all committees were in strict compliance with these regulations.

5. That the 4th Congressional District Delegates for Mondale Committee has not accepted any contributions from union political action committees or from any other contributors in excess of the $5,000.00 contribution limit established by the Federal Election Campaign Act.

6. That the 4th Congressional District Delegates for Mondale Committee was not at any time subject to control of the Mondale for President Committee or the Mondale Presidential Campaign with respect to any of its operations, including the contents of its campaign materials or the Committees' decisions regarding contributions.

7. That the 4th Congressional District Delegates for Mondale Committee has never hired a Mondale campaign worker who has been laid off.

8. That the 4th Congressional District Delegates for Mondale Committee has never contributed any money to the Mondale for President Committee or to any other delegate committees.

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9. That the 4th Congressional District Delegates for Mondale Committee has not at any time accepted contributions from sources prohibited under the Federal Election Campaign Act or the regulations promulgated thereunder.

10. That the 4th Congressional District Delegates for Mondale Committee has acted in full compliance with the Federal Election Campaign Act, the regulations of Federal Election Commission and has remained an independent organization unaffiliated with the Mondale for President Committee or with other delegate committees supporting Walter Mondale.

11. That the statements made herein are true and correct to the best of my knowledge.

FURTHER AFFIANT SAYETH NAUGHT.

CALVIN D. DEVONEY

SWORN TO AND SUBSCRIBED before me this 15 day of June, 1984.

NOTARY PUBLIC
State of Florida at Large

My Commission Expires:

Notary Public, State of Florida
My Commission Expires Oct. 11, 1987

8504050017569

RECEIVED AT THE FEC
GCC#3380
84 MAY 31 AM 8:

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1667

NAME OF COUNSEL: Marcia Rosen Esq.

ADDRESS: Penthouse 1
1401 Brickell Ave.
Miami, Florida 33131

TELEPHONE: 305-579-0500

MUR 1667 pg. 6

MUR 1667
Mem

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.

5/18/84
Date

Melvin Dreyer
Signature

Mondale Delegate
Congressional District #13

RESPONDENT'S NAME: Melvin Dreyer

ADDRESS: 1625 Whistler Ave
Ft. Myers, Florida
33901

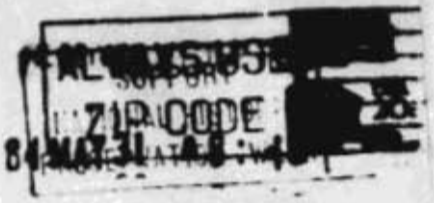
HOME PHONE: 813-936-6076

BUSINESS PHONE:

8504017700

1625 Wexford Ave
Ft. Myers, Fla. 33901





Federal Election Commission
1325 K Street, N.W.
Washington D.C. 20005

85040501771

STATEMENT OF DESIGNATION OF COUNSEL

RECEIVED AT THE FEC
84 JUN 14 A9:31

MUR 1704

NAME OF COUNSEL: Myron) Cowen, Esq.

ADDRESS: Penthouse 1
1401 Brickell Ave
Miami, Florida 33131

TELEPHONE: 305-579-0500

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.

6/8/84
Date

Melinda J. Steiner
Signature

RESPONDENT'S NAME: Melinda Steiner

ADDRESS: 1625 Winkler Ave
Ft. Myers Florida
33901

HOME PHONE: 813-936-6076

BUSINESS PHONE:

Mondale Delegates
Congressional District
#13

8504050172

1625 Winkler Ave
Ft Myers, Fla. 33901

FT. MYERS FLA. 84 JUN 14 AM 8:

Federal Election Commission
Washington, D.C.
20463

8504050017 7 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Melinda Greiner, Treasurer
Mondale Delegates, Congressional
District #13
1625 Winkler Avenue
Ft. Myers, FL 33901

Re: MUR 1667

Dear Ms. Greiner:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against the committee and you, as treasurer, in connection with this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you intend to be represented by counsel in this matter please advise the Commission by 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.

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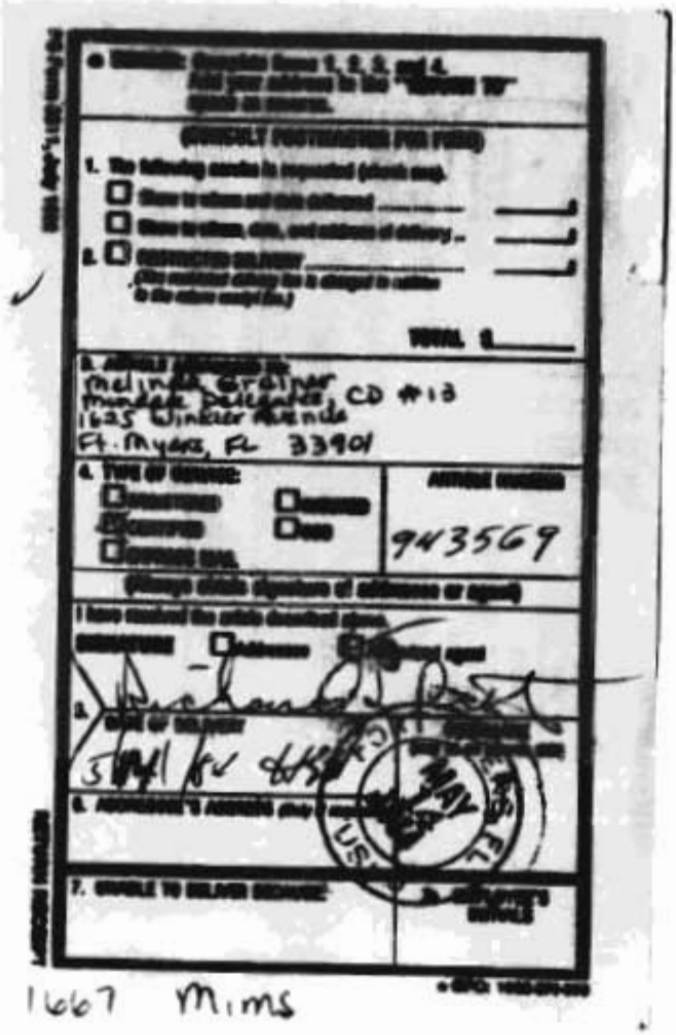
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

Enclosures
1. Complaint
2. Procedures
3. Designation of Counsel Statement



1667 Mims

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Cuth 3913
HAND DELIVERED
JUN 25 A 9: 22

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WRITER'S DIRECT NO.

FEDERAL EXPRESS

June 25, 1984

Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20005

Re: Complaint of the National Right to Work Committee, et al v. Walter F. Mondale and Mondale for President Campaign Committee, et al, MUR-1704

Dear Commissioners:

Please accept the enclosed Affidavits as a supplemental filing to the response that was filed on behalf of certain Florida delegate committees in the above-referenced matter.

Very truly yours,

STUART H. SINGER

SHS/ch
Enc.

8504501775

BEFORE THE
FEDERAL ELECTION COMMISSION

NATIONAL RIGHT TO WORK COMMITTEE and RALPH MARTIN HETTINGA, JR., Complainants, v. WALTER F. MONDALE and MONDALE FOR PRESIDENT CAMPAIGN COMMITTEE, et al., Respondents.	MUR 1704 AFFIDAVIT OF NANCY MILLER

STATE OF FLORIDA)
) SS:
COUNTY OF DADE)

BEFORE ME, the undersigned authority, personally appeared, NANCY MILLER, who, after first being duly sworn, deposes and says that:

1. I am treasurer of the Northern 12th Congressional District Delegates for Mondale Committee.

2. That the Northern 12th Congressional District Delegates for Mondale Committee was formed and has been operated independent of the Mondale for President Committee and of other delegate committees supporting the candidacy of Mr. Mondale.

3. That upon formation, the Northern 12th Congressional District Delegates for Mondale Committee timely registered with the Federal Election Commission pursuant to 11 C.F.R. part 102 and 2 U.S.C. §433, and thereafter complied with 11 C.F.R. part 104 and 2 U.S.C. §434 with respect to reporting contributions and expenditures.

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4. That the only assistance provided by the Mondale campaign staff in the formation of the delegate committees is a memorandum provided by the Mondale for President Committee describing the laws and Commission regulations governing the primary election process to insure that all committees were in strict compliance with these regulations.

5. That the Northern 12th Congressional District Delegates for Mondale Committee has not accepted any contributions from union political action committees or from any other contributors in excess of the $5,000.00 contribution limit established by the Federal Election Campaign Act.

6. That the Northern 12th Congressional District Delegates for Mondale Committee was not at any time subject to control of the Mondale for President Committee or the Mondale Presidential Campaign with respect to any of its operations, including the contents of its campaign materials or the Committees' decisions regarding contributions.

7. That the Northern 12th Congressional District Delegates for Mondale Committee has never hired a Mondale campaign worker who has been laid off.

8. That the Northern 12th Congressional District Delegates for Mondale Committee has never contributed any money to the Mondale for President Committee or to any other delegate committees.

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9. That the Northern 12th Congressional District Delegates for Mondale Committee has not at any time accepted contributions from sources prohibited under the Federal Election Campaign Act or the regulations promulgated thereunder.

10. That the Northern 12th Congressional District Delegates for Mondale Committee has acted in full compliance with the Federal Election Campaign Act, the regulations of Federal Election Commission and has remained an independent organization unaffiliated with the Mondale for President Committee or with other delegate committees supporting Walter Mondale.

11. That the statements made herein are true and correct to the best of my knowledge.

FURTHER AFFIANT SAYETH NAUGHT.

Nancy Miller
NANCY MILLER

SWORN TO AND SUBSCRIBED before me this 20th day of June, 1984.

Lynn W. Blanchet
NOTARY PUBLIC
State of Florida at Large

My Commission Expires:

My Commission Expires [illegible]
Bonded by Western Surety Company

8504050179

LAW OFFICES

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WRITER'S DIRECT NO.
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FCC #3728

June 19, 1984

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Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20005

Re: Complaint of the National Right to Work Committee, et al. v. Walter F. Mondale and Mondale For President Campaign Committee, et al., MUR 1704

Dear Commissioners:

This response is filed on behalf of Florida Delegate Committees which support the candidacy of Walter Mondale in the Fourth, Fifth, Eighth, Ninth, Northern Twelfth, Thirteenth and Fourteenth Congressional Districts and the South Florida Delegates for Mondale Committee and is being filed in opposition to the above-referenced complaint of the National Right to Work Committee and Ralph Martin Hettinga, Jr. filed on May 21, 1984. In its complaint, the National Right To Work Committee ("NRWC") asserts that a number of union-related political action committees have

evaded the contribution limits of the Federal Election Campaign Act by making contributions to delegate committees which NRWWC assets are affiliated with one another and with the Mondale for President Committee ("MPC"). The complainant requests that the Commission hold the independent Mondale delegate committees throughout the country, along with the MPC, to a single common contribution limitation.

For the reasons set forth below, we submit that the allegations presented by the complainant do not warrant further investigation by the Commission. Initially, we would urge the Commission to require a "high threshold" of proof before commencing such an investigation. Investigations of allegedly improper campaign activities, once launched, attract considerable public attention, notwithstanding the confidentiality provisions of the Federal Election Campaign Act, and may impact upon the presidential campaign itself. Indeed, creating such publicity may be a prime purpose behind the filing of this Complaint. Moreover, such investigations may infringe upon or "chill" the exercise of political expression and associational rights by grass roots groups such as the Florida delegate committees by enmeshing the committees in often protracted, costly and burdensome proceedings. Unless such investigations are carefully limited, they may hinder the very type of local volunteer activity which the Chair-

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man of the Commission has characterized as "the essence of healthy election campaigning," Federal Election Campaign Act Amendments of 1979, "Hearings before the Senate Committee on Rules and Administration," 96th Congress, 1st Sess. at 8 (1979), and which Congress has sought to encourage in enacting the coattails provisions of the Federal Election Campaign Act Amendments of 1979. 2 U.S.C. §431(8)(b)(i).1/ The Commission has also acted to facilitate in the delegate selection process similar campaign activity to that encouraged in the general election by the statutory coattails provision. See FEC Explanation and Justification, 1 Federal Election Campaign Finance Guide (CCH), ¶ 864 at 1561-1567. The Commission's objective would be undermined if full scale investigations are undertaken upon such wide ranging and unconfirmed accusations of affiliation as those made in the NRWC Complaint. Although the Commission has not articulated the level of cause which must exist before proceeding to a formal investigation, at least in the context of grass roots campaign activity, the burden of proof upon a complainant should be substantial.

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1/ Under these provisions, candidates for public office, including presidential candidates, may coordinate grass roots campaigning without violating the Act.

I. THE FEDERAL ELECTION CAMPAIGN ACT DOES NOT PROHIBIT "AFFILIATION" AMONG COMMITTEES RECEIVING CONTRIBUTIONS.

The NRWC Complaint is predicated on 2 U.S.C. § 441a(a)(5), which states that all contributions made by political committees "established, financed, maintained, or controlled by [the same] person" shall be considered to have been made by a single political committee. NRWC, however, is not alleging affiliation among the contributing sources but rather among the recipient delegate committees. Neither 2 U.S.C. § 441a(a)(5), nor any other provision of the Act authorizes the Commission to treat contributions made to delegate committees as contributions made to the candidate. That the Commission should not assume such authority is implicit from § 441a(a)(7)(A) which states only that contributions made to a political committee "authorized by such candidate to accept contributions on his behalf" shall be considered as contributions made to the candidate. If Congress had intended to consider other contributions -- such as those involved here -- as contributions to the candidate, it would have so legislated.

This interpretation is supported by § 441a(a)(5)(A) which states that the "affiliation" provisions of that section do not limit "transfers between political committees of funds raised through joint fund raising efforts." Moreover, § 441a(a)(4) stipulates that the limitations on contributions "do not apply to transfers between and among political committees which are

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national, state, district or local committees (including any subordinate committee thereof) of the same political party," although clearly the activities of such committees are closely coordinated. The Supreme Court gave related provisions of the Act, allowing such transfers for Senatorial campaigns, an expansive interpretation in upholding the Commission's interpretation in Federal Election Comm. v. Democratic Senatorial Campaign Committee, 454 U.S. 27 (1981).

Not only did Congress not authorize the Commission to take the action complainant requests, but there is an obvious reason why delegate committees should not be subject to single contribution limits. Unless the committees do in fact coordinate their actions and exchange records, there is no way one delegate committee can determine whether a given contribution tendered to it violates the Act's contribution limits.

II. FLORIDA DELEGATE COMMITTEES ARE NOT AFFILIATED WITH EACH OTHER OR WITH THE MONDALE FOR PRESIDENT COMMITTEE.

Florida delegate committees filing this response are independently established autonomous committees who are not affiliated either with other committees operating throughout the state and nation or with the MPC. Thus, even if the standards for affiliation for the purpose of the Act's contribution limitations set forth at 2 U.S.C. § 441a(a)(5) are relevant to this com-

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plaint, the Florida delegate committees have not been so affiliated. The Commission has interpreted the general statutory standards set forth in § 441a(a)(5) by prescribing five factors to be used in determining whether committees are affiliated 11 C.F.R. § 100.5(g)(2)(ii): (1) ownership by one committee of a controlling interest in voting shares or securities in another committee; (2) provisions of by-laws, constitutions or other documents by which one committee has the authority, power or ability to direct another committee; (3) the authority, power or ability of one committee to hire, appoint, discipline, discharge, demote or remove or otherwise influence the decision of the officer or members of the other committees; (4) similar patterns of contributions by the committees in questions; and (5) the transfer of funds between committees which represent a substantial portion of the funds of the committees in question.

The allegations in the NRWC Complaint, even if accepted on their face, do not satisfy the Commission's affiliation criteria. Moreover, the Florida delegate committees on whose behalf this response is filed are not specifically mentioned by the allegations concerning affiliation. Until the complainant establishes that the affiliation standards have been met, there is no reason for a formal investigation. As documented by the attached

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affidavits,[2] the Florida delegate committees filing this response were established by delegates independently of the MPC. The formation of the committees, appointment of treasurers, the choice of a committee name, opening of a bank account and other actions were all performed independently by each committee. The delegate committees financed their operations through fund raisers and other means and controlled their own activities. The MPC enjoyed no control over the members of the committee.

Relying on various news accounts,[3] the complaint asserts that the national Modale staff "instructed" delegate committees on how to organize and operate, that Mondale staff were transfer-

---

[2] Supporting affidavits on behalf of other committees will be forwarded as soon as possible as a supplemental filing to this response.

[3] For the most part, the news accounts relied upon in the complaint failed to meet the Commission's policy with regard to the opening of compliance actions on the basis of newspaper accounts. See Commission Memorandum No. 663 November 15, 1979. That policy requires a news account to be well documented, substantial, and to meet all of the requirements of a complaint in order to constitute a sufficient basis for an enforcement action. The news accounts relied upon in the NWRC complaint do not meet this standard. They are based on speculative and conclusory quotes which do not set forth a substantive statement of facts. For this reason, the allegations concerning the affiliation of delegate committees with each other and with the MPC based on newspaper articles do not create a sufficient basis for further investigation.

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red to the delegate committees, that committees declined PAC contributions at Mr. Mondale's request, that the MPC's office of legal counsel was made available to advise delegate committees, that funds were transferred from a delegate committee in one state to a sister group in another, that certain registration statements for different committees were purportedly written by the same person and mailed in envelopes typed on the same typewriter and reported joint spending at the same print shops, and that delegate committees started disbanding after Walter Mondale requested them to do so. Each of these allegations is addressed below, and the response to these allegations is supported by sworn affidavits from the delegate committee treasurers.

1. The only assistance provided by the Mondale staff in the formation of the delegate committees filing this response was a memorandum provided by the MPC describing the laws and commission regulations governing the primary election process to insure that all committees were in strict compliance with these regulations. The provision of such legal assistance is expressly authorized by 2 U.S.C. § 431(8)(B)(ix).

2. The Florida delegate committees represented herein have not hired any MPC campaign workers.

3. Mr. Mondale's decision to request delegate committees supporting his candidacy not to accept PAC contributions hardly

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can be the basis for a finding of an affiliation among the committees and the MPC. In the first place, there is nothing whatever to suggest that the committees followed Mr. Mondale's direction in this regard. In Florida, at least, the primary had already been conducted at this time and contributions from any source, including political action committees, were no longer needed. A committee's decision not to accept further contributions hardly demonstrates that the delegate committees actions were being orchestrated by Mr. Mondale or the MPC. To the contrary, the delegate committees' earlier decisions to accept limited contributions from political action committee sources while Mr. Mondale had decided not to accept such contributions for the purposes of his own campaign illustrates the independence of decisionmaking between the MPC and the delegate committees.

4. The availability of legal advice to the delegate committees is not a basis on which affiliation may be found. Indeed, even the provision of legal advice regarding Commission regulations is not a basis upon which the Commission may find the delegate committees to have affiliated themselves with the national campaign. See 2 U.S.C. § 431(8)(B)(ix).

5. The delegate committees represented in this response have not contributed any money to the MPC or to any other delegate committees.

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6. The allegations concerning the use of a similar typewriter or printer, even if true, hardly support a finding of affiliation as set forth under the Commission's regulations.

7. The fact that some delegate committees disbanded after the purpose for which they were created -- the primary elections -- concluded is hardly surprising and is not indicative of any affiliation among the committees or affiliation with the national campaign.

In sum, the alleged coordination and control of the delegate committees by the Mondale campaign has not been established, at least with respect to the Florida delegate committees filing this response. Furthermore, the private investigatory reports discussed on page 6 of the complaint do not identify any of the Florida delegate committees filing this response as having been involved in any allegedly "affiliated" activity. For these reasons, there is no basis for concluding that the Mondale delegate committees are affiliates of the Mondale campaign and share a single limit on contributions that they may receive from any one source for the election.

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III. COMMISSION INTERPRETATIONS SHOULD BE INTERPRETED IN LIGHT OF THE DELEGATES' CONSTITUTIONAL RIGHTS TO POLITICAL ASSOCIATION THROUGH COMMITTEES.

The FEC is being asked to investigate committee activities which are fully subject to First Amendment protection. The organization of groups to participate in the political process lies at the core of the First Amendment rights of expression and association. As Chief Justice Burger stated for the Supreme Court in Citizens Against Rent Control v. City of Berkeley, 454 U.S. 290, 294 (1982):

> "[T]he practice of persons sharing common views banning together to achieve a common end is deeply embedded in the American political process. . . . The tradition of volunteer committees for collective action has manifested itself in myriad community and public activities; in the political process, it can focus on a candidate or on a ballot measure. Its value is that by collective effort, individuals can make their views known when, individually, their voices would be faint or lost."

Any interpretation of Commission regulations, or for that matter, any direct regulation either by this Commission or even by the Congress which infringed on the rights of individual delegates to campaign together through delegate committees would be constitutionally suspect:

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> Effective advocacy of both public and private points of view, particularly controversial ones, is undeniably enhanced by group association, as this Court has more than once recognized by remarking upon the close nexus between the freedoms of speech and assembly.

NAACP v. Alabama, 357 U.S. 449, 460 (1958); Buckley v. Valeo, 424 U.S. 1, 14 (1976); Citizens Against Rent Control v. City of Berkeley, 454 U.S. at 294; Federal Election Commission v. Florida for Kennedy Committee, 681 F.2d 1281, 1284-1285 (11th Cir. 1982).

In Buckley v. Valeo, the Supreme Court made clear that:

> "The First Amendment protects political association, as well as political expression. The constitutional right of association explicated in NAACP v. Alabama, 357 U.S. 449 (1958), stems from the Court's recognition that "effective advocacy of both public and private points of view, particularly controversial ones, is undeniably enhanced by group association.' Subsequent decisions have made clear that the First and Fourteenth Amendments guarantee 'freedom to associate with others for the common advancement of political beliefs and ideas,' a freedom that encompasses 'the right to associate with the political party of one's choice.' Kusper v. Pontikes, 414 U.S. 51, 56 (1973), quoted in Cousins v. Wigoda, 419 U.S. 477, 487 (1975)."

Because of the importance of free expression and association rights in the context of political campaigns, the Supreme Court in Buckley invalidated limitations on campaign expenditures, and upheld restrictions on contributions only because they were care-

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fully limited to the single interest that the court found legitimate in this area: the perception of undue influence created by large contributions to a candidate.[4/]

Activities by a political party in the primary process are even further insulated from government intrusion. In Democratic Party of the United States v. Wisconsin, 450 U.S. 119, the court held that members of the National Democratic Party's associational rights to determine who could participate in the processes leading to the selection of delegates at a national convention could not be limited by Wisconsin's interests in forcing the National Party to honor primary results. In so holding, the court followed its earlier holding in Cousins v. Wigoda, 419 U.S. 477, that state law did not have primacy over national political party's rules in determination of the qualifications and eligibility of delegates to the National Party's Convention. The court stated that "Illinois' interest in protecting the integrity of its electoral process cannot be compelling in the context of the selection of delegates to the National Party Convention."

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4/ As the Supreme Court has subsequently stated, "Buckley identified a single narrow exception to the rule that limits on political activity were contrary to the First Amendment. The exception relates to the perception of undue influence of large contributions to a candidate." Citizens Against Rent Control v. City of Berkeley, 454 U.S. at 297 (emphasis in original).

Id. at 491. The Cousins court relied upon the principle that "the National Democratic Party and its adherents enjoy a constitutionally protected right of political association." Id. at 487. For the reasons articulated in these cases, the Commission should be particularly hesitant before launching investigations into primary campaign activities which are, after all, essentially matters for the Democratic Party to resolve.

The constitutional implications of any commission regulation of political activities by delegate committees are clear. First, the constitutionally permissible scope of any regulation of delegate committee activities is limited by the Supreme Court's decision in Buckley to the single possibility of the perception of undue influence through contributions to a candidate. Conducting a full scale investigation on other issues is pointless, given the Supreme Court's Buckley ruling. Second, the investigation itself raises significant constitutional questions. By forcing the disclosure of committee workings, and enmeshing the committees in an investigation, the Commission risks infringing and chilling the rights of delegates to form committees to advance their cause. An investigation into the activities of the Florida Mondale Delegate Committees and other delegate committees supporting any candidate, should only be undertaken when there is far stronger evidence of misconduct than that which has been

8504017933

presented in this Complaint. In Federal Election Commission v. Florida Committee, 681 F.2d 1281 (11th Cir. 1982), the Court of Appeals recognized that:

> "A higher degree of scrutiny must attach before courts can compel disclosure of information that may impinge upon First Amendment associational rights."

Federal Election Commission v. Mechanists Non-Particant Political League, 665 F.2d 380 (D.C. Cir.), cert. denied, 454 U.S. 897 (1981). The Court of Appeals followed the Supreme Court's holding in Sweezy v. New Hampshire, 354 U.S. 234, 245 (1957), that:

> "It is particularly important that the exercise of the power of compulsory process be carefully circumscribed when the power of compulsory process tends to impinge upon such highly sensitive areas as freedom of speech or press, freedom of political association and freedom of communication of ideas. . . ."

While the Supreme Court upheld the constitutionality of the $5,000 contribution limit for committees in California Medical Association v. Federal Election Commission, 453 U.S. 182 (1981), that decision does not authorize the Commission to take an expansive view of the affiliation standards which would effectively nullify the opportunity provided under the Federal Election Campaign Act for individuals to form delegate committees in support of their own election as delegates to the National convention.

8504050179 1

IV. UNCERTAINTIES ABOUT THE ROLE OF UNION-RELATED PAC CONTRIBUTIONS TO DELEGATE COMMITTEES SHOULD BE ADDRESSED THROUGH THE COMMISSION'S RULE MAKING POWERS.

An investigation of delegate committees may well create political effects and ramifications on the presidential campaign. Walter Mondale has stated that he will take steps to refund contributions made to disputed delegate committees supporting his presidential campaign. In light of this action by Mr. Mondale, and by the reality that the presidential primary process for the 1984 campaign is at an end, there is no urgency for the Commission to undertake an investigation at this time which may create possible ramifications on the candidates and the general election campaign.

Ironically, the only way independent delegate committees could monitor political action committee contributions to ensure that the aggregate amount contributed by a single union-related PAC did not exceed the Act's limits would be to engage in the type of affiliated activity that the NRWC protests in this complaint. If the Commission believes it necessary, it should resolve the tension between the affiliation rules and the contribution limits through its rulemaking authority. As the law is currently written, individual delegate committees are not responsible for contributions that may be made to and received by other delegate committees. For this reason alone, there is no basis

8504017900

for subjecting the delegate committees to a formal investigation into the allegations of this complaint.

CONCLUSION

For the foregoing reasons, the Fourth, Fifth, Eighth, Ninth, Twelfth, Thirteenth and Fourteenth Congressional District Delegates for Mondale Committees, and the South Florida Delegates for Mondale Committee, urges that the Commission should find no reason to believe that a violation under the Federal Election Campaign Act has occurred.

Respectfully submitted,

GREENBERG, TRAURIG, ASKEW,
HOFFMAN, LIPOFF, ROSEN &
QUENTEL, P.A.

By: _____
MARLENE K. SILVERMAN

_____
STUART H. SINGER

8504050179 3

BEFORE THE
FEDERAL ELECTION COMMISSION

NATIONAL RIGHT TO WORK COMMITTEE and RALPH MARTIN HETTINGA, JR., Complainants, v. WALTER F. MONDALE and MONDALE FOR PRESIDENT CAMPAIGN COMMITTEE, et al., Respondents.	MUR 1704 AFFIDAVIT OF GEORGE E. COMERFORD

STATE OF FLORIDA)
) SS:
COUNTY OF DADE)

BEFORE ME, the undersigned authority, personally appeared, GEORGE E. COMERFORD, who, after first being duly sworn, deposes and says that:

1. I am treasurer of the 14th Congressional District Delegates for Mondale Committee.

2. That the 14th Congressional District Delegates for Mondale Committee was formed and has been operated independent of the Mondale for President Committee and of other delegate committees supporting the candidacy of Mr. Mondale.

3. That upon formation, the 14th Congressional District Delegates for Mondale Committee timely registered with the Federal Election Commission pursuant to 11 C.F.R. part 102 and 2 U.S.C. §433, and thereafter complied with 11 C.F.R. part 104 and 2 U.S.C. §434 with respect to reporting contributions and expenditures.

8504017797

4. That the only assistance provided by the Mondale campaign staff in the formation of the delegate committees is a memorandum provided by the Mondale for President Committee describing the laws and Commission regulations governing the primary election process to insure that all committees were in strict compliance with these regulations.

5. That the 14th Congressional District Delegates for Mondale Committee has not accepted any contributions from union political action committees or from any other contributors in excess of the $5,000.00 contribution limit established by the Federal Election Campaign Act.

6. That the 14th Congressional District Delegates for Mondale Committee was not at any time subject to control of the Mondale for President Committee or the Mondale Presidential Campaign with respect to any of its operations, including the contents of its campaign materials or the Committees' decisions regarding contributions.

7. That the 14th Congressional District Delegates for Mondale Committee has never hired a Mondale campaign worker who has been laid off.

8. That the 14th Congressional District Delegates for Mondale Committee has never contributed any money to the Mondale for President Committee or to any other delegate committees.

8504017993

9. That the 14th Congressional District Delegates for Mondale Committee has not at any time accepted contributions from sources prohibited under the Federal Election Campaign Act or the regulations promulgated thereunder.

10. That the 14th Congressional District Delegates for Mondale Committee has acted in full compliance with the Federal Election Campaign Act, the regulations of Federal Election Commission and has remained an independent organization unaffiliated with the Mondale for President Committee or with other delegate committees supporting Walter Mondale.

11. That the statements made herein are true and correct to the best of my knowledge.

FURTHER AFFIANT SAYETH NAUGHT.

8504050177 2

George E. Comerford
GEORGE E. COMERFORD

SWORN TO AND SUBSCRIBED before me this 15 day of June, 1984.

Robert J. Murray
NOTARY PUBLIC
State of Florida at Large

My Commission Expires:

Notary Public, State of Florida
My Commission Expires May 6 20 1988

BEFORE THE
FEDERAL ELECTION COMMISSION

NATIONAL RIGHT TO WORK COMMITTEE and RALPH MARTIN HETTINGA, JR., Complainants, v. WALTER F. MONDALE and MONDALE FOR PRESIDENT CAMPAIGN COMMITTEE, et al., Respondents.	MUR 1704 AFFIDAVIT OF CALVIN D. DEVONEY

STATE OF FLORIDA)
) SS:
COUNTY OF DADE)

BEFORE ME, the undersigned authority, personally appeared, CALVIN D. DEVONEY, who, after first being duly sworn, deposes and says that:

1. I am treasurer of the 4th Congressional District Delegates for Mondale Committee.

2. That the 4th Congressional District Delegates for Mondale Committee was formed and has been operated independent of the Mondale for President Committee and of other delegate committees supporting the candidacy of Mr. Mondale.

3. That upon formation, the 4th Congressional District Delegates for Mondale Committee timely registered with the Federal Election Commission pursuant to 11 C.F.R. part 102 and 2 U.S.C. §433, and thereafter complied with 11 C.F.R. part 104 and 2 U.S.C. §434 with respect to reporting contributions and expenditures.

8504018007

4. That the only assistance provided by the Mondale campaign staff in the formation of the delegate committees is a memorandum provided by the Mondale for President Committee describing the laws and Commission regulations governing the primary election process to insure that all committees were in strict compliance with these regulations.

5. That the 4th Congressional District Delegates for Mondale Committee has not accepted any contributions from union political action committees or from any other contributors in excess of the $5,000.00 contribution limit established by the Federal Election Campaign Act.

6. That the 4th Congressional District Delegates for Mondale Committee was not at any time subject to control of the Mondale for President Committee or the Mondale Presidential Campaign with respect to any of its operations, including the contents of its campaign materials or the Committees' decisions regarding contributions.

7. That the 4th Congressional District Delegates for Mondale Committee has never hired a Mondale campaign worker who has been laid off.

8. That the 4th Congressional District Delegates for Mondale Committee has never contributed any money to the Mondale for President Committee or to any other delegate committees.

8504018001

9. That the 4th Congressional District Delegates for Mondale Committee has not at any time accepted contributions from sources prohibited under the Federal Election Campaign Act or the regulations promulgated thereunder.

10. That the 4th Congressional District Delegates for Mondale Committee has acted in full compliance with the Federal Election Campaign Act, the regulations of Federal Election Commission and has remained an independent organization unaffiliated with the Mondale for President Committee or with other delegate committees supporting Walter Mondale.

11. That the statements made herein are true and correct to the best of my knowledge.

FURTHER AFFIANT SAYETH NAUGHT.

CALVIN D. DEVONEY

SWORN TO AND SUBSCRIBED before me this 15 day of June, 1984.

NOTARY PUBLIC
State of Florida at Large

My Commission Expires:

Notary Public, State of Florida
My Commission Expires Oct. 11, 1987

8504050180 2

RECEIVED BY THE FEC
Gen # 3594
84 JUN 13 P12:26

LAW OFFICES

GREENBERG, TRAURIG, ASKEW, HOFFMAN, LIPOFF, ROSEN & QUENTEL

LINDA ROOBRICK ADLER
MICHAEL O. ALBERTINE
CESAR L. ALVAREZ
RUDOLPH F. ARAGON
RICHARD A. ARKIN
REUBIN O'D. ASKEW
JAMES L. BACCHUS
HILARIE BASS
NORMAN J. BENFORD
MARK D. BLOOM
BURT BRUTON
STEVE BULLOCK
ROBERT K. BURLINGTON
ALAN R. CHASE
SUE N. COBB
KENDALL B. COFFEY
MARK B. DAVIS
ALAN T. DIMOND
CHARLES W. EDGAR, III
GARY M. EPSTEIN
THOMAS K. EQUELS
RICHARD G. GARRETT
LAWRENCE GODOFSKY
ALAN S. GOLD
HARVEY A. GOLDMAN
STEVEN E. GOLDMAN
STEVEN M. GOLDSMITH
BRIAN K. GOODKIND
LAWRENCE S. GORDON
MATTHEW S. GORSON
MELVIN N. GREENBERG
MARILYN D. GREENBLATT
ROBERT L. GROSSMAN
GARY M. HELD
LARRY J. HOFFMAN
ARNOLD M. JAFFEE
MARTIN KALB
ROBERT A. KAPLAN
TIMOTHY E. KISH
ALAN B. KOSLOW
STEVEN J. KRAVITZ
STEVEN A. LANDY
STEVEN S. LAPIDUS
ALAN S. LEDERMAN
LAWRENCE S. LEVY
NORMAN H. LIPOFF
GARY D. LIPSON
CARLOS E. LOUMIET
JUAN P. LOUMIET
DEBBIE RUTH MALINSKY
GREGORY A. MARTIN
PEDRO A. MARTIN
ALAN M. MITCHEL
LOUIS NOSTRO
ANTHONY J. O'DONNELL, JR.
ROGER D. OSBURN
BYRON G. PETERSEN
VICTOR H. POLK, JR.
ALBERT D. QUENTEL
NICHOLAS ROCKWELL
MARVIN S. ROSEN
DAVID L. ROSS
DAVID P. ROWE
ROBERT N. RUBENSTEIN
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TIMOTHY A. SMITH
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HERBERT M. SUSKIN
YOLANDA MELLON TARAFA
ROBERT H. TRAURIG
STANLEY H. WAKSHLAG
JONATHAN H. WARNER
DAVID H. WELLS
JULIE A. S. WILLIAMSON
JERROLD A. WISH

AMBLER H. MOSS, JR.
ZACHARY H. WOLFF
OF COUNSEL

BRICKELL CONCOURS
1401 BRICKELL AVENUE
MIAMI, FLORIDA 33131

TELEPHONES
MIAMI (305) 579-0800
BROWARD (305) 523-8111
TELEX 80-3134
TELECOPY (305) 579-0717
WRITER'S DIRECT NO.:

8504050180 5

June 6, 1984

84 JUN 13 P2:40

Mr. Steven Mims
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20005

Re: MUR-1667

Dear Mr. Mims:

This letter is to notify you that on June 5, 1984 this firm was retained to represent the Northern 12th Congressional District Delegates for Mondale Committee with regard to MUR-1667. Please treat the response filed on behalf of other Florida delegate committees by this firm on June 4, 1984 as also constituting a response by the Northern 12th Congressional District Delegates for Mondale Committee.

Sincerely yours,

Stuart H. Singer

STUART H. SINGER

SHS/ch

LAW OFFICES
G, TRAURIG, ASKEW, HOFFMAN, LIPOFF, ROSEN & QUENTEL, P.A.
BRICKELL CONCOURS
1401 BRICKELL AVENUE
MIAMI, FLORIDA 33131

FEC
84 JUN 13 P12:24

Mr. Steven Mims
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20005

RECEIVED AT THE FEC
84 JUN 8 AM: 38

June 5, 1984

Federal Election Commission
Charles N. Steele
Washington, D.C. 20463

RE: MUR 1704

Dear Mr. Steele:

Per letter of May 29, 1984, this is my statement authorizing Stuart Singer of Greenburg, Traurig to receive any notifications or other communications from the Commission in reference to the above.

Sincerely,

Nancy Miller
Northern 12th Congressional District
Delegates for Mondale
2129 SE Holland St.
Pt St Lucie, Fl 33452

8504050180 5

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1704

NAME OF COUNSEL: Stuart Singer of Greenburg, Traurig

ADDRESS: 1401 Brickell Av

Miami, Fl 33131

TELEPHONE: 305-579-0535

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.

6/5/84
Date

Signature

RESPONDENT'S NAME: Nancy Miller,

ADDRESS: 2129 SE Holland St.

Pt. St. Lucie, Fl 33452

HOME PHONE: 305-335-8040

BUSINESS PHONE: 305-287-3366

8504050180 6

2th Congressional
legates for Mondale
olland St.
ie FL 33452





Federal Election Commission

Washington, D. C.
20463

85 040501 30

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Nancy Miller, Treasurer
Northern 12th Congressional
District Delegates For
Mondale
2129 S E Holland Street
Port St. Lucie, FL 33452

Re: MUR 1667

Dear Ms. Miller:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against the committee and you, as treasurer, in connection with this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you intend to be represented by counsel in this matter please advise the Commission by 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.

8504050180 3

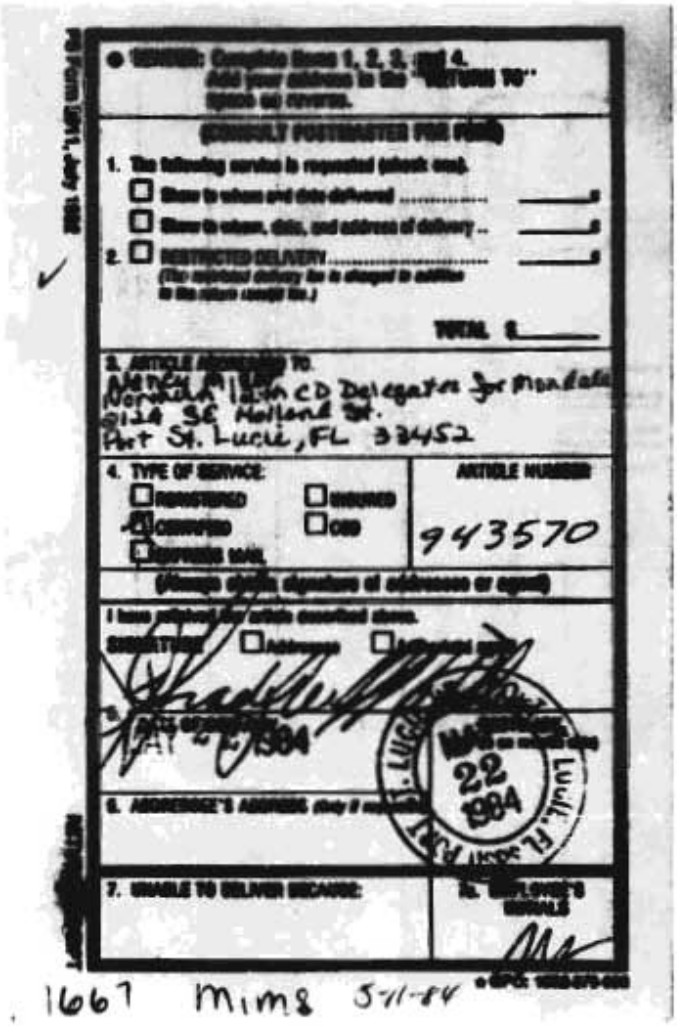
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

Enclosures
1. Complaint
2. Procedures
3. Designation of Counsel Statement



1667 Mims 5-11-84

8504050180 9

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 19, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

C.D. 11 Delegates for Mondale
981 Church Street
Rockledge, FL 32955

Re: MUR 1704

Dear Sir or Madam:

This letter is to notify you that on May 18, 1984 the Federal Election Commission received a complaint which alleges that the committee and its treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1704. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against the committee and its treasurer, in connection with this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you intend to be represented by counsel in this matter please advise the Commission by 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.

8304050180

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. 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

8504050181

RECEIVED
FEC
JUN 7 PM 2:36

Federal Elections Commission
1325 K St N.W.
Washington, D.C. 20463

MUR
R.E. 1704

Bernard E. Shingle
5520 2nd Ave Dr West
Bradenton, Florida 33529

Sir:

In reference to your letter dated May 29, 1984, I feel that no other action should be taken in this matter as noted by the enclosed material.

All funds raised were raised with the express purpose of the campaigning efforts of the Congressional District #10 Delegates for Mondale in expressing their desire to become delegates to the Democratic National Convention. As you will note in my financial statement, and my report on R.E. 1667, all monies received were from private individuals with one exception. That being the donation from the International Brotherhood of Electrical Workers; P.A.C. 915 Tampa, Florida. This P.A.C. is a federal registered P.A.C. The money from the P.A.C. fund was given to this committee in support of Mr James Lacher. It was used to support his candidacy and that of the other delegates, as Delegates for Mondale to the National Convention. It should be noted that Mr Lacher is a long time member of the I.B.E.W.

In reference to our statement of finance, I refer you to Exhibit #1.

#1. Delegate Slate Cards (handout)
#2. Delegates for Mondale (handout)
Item G on Financial Statement

8504050182

#3. Receipt for above Literature
#4. Advertisement for election of our slate of candidates

As noted, The printer has written Mondale Cards. These were not Mondale cards, but Mondale Delegate Cards as shown by Exhibit #2, enclosed with this letter.
I refer you to Item B, on my termination report. Mr Lacher qualified as a party officer to be considered as a delegate for the National Democratic Convention, which constituted his trip to Tallahassee, Florida on May 5, 1984.
In closing, this should clear up this confussion, as well as showing where all our monies went. All our monies received were spent for the promotion of our candidacy as delegates to the National Democratin Convention. Take note that all literature was paid for by our committee, and not by the National Mondale Campaign.

Sincerely Yours
Bernard E. Shingle
Treasurer

c.c. B.E.S.

8504050181 3

Exhibit #1

VOTE – March 13

☒ **Walter Mondale**
and delegates for Mondale:

☒ **R.L. Brumbaugh**
(Mondale)

☒ **Juanita M. Geathers**
(Mondale)

☒ **James P. Lacher**
(Mondale)

☒ **Marlene Duffy Young**
(Mondale)

Alternate

☒ **Margaret Chiefari**
(Mondale)

It is important to vote for all six names: Presidential candidate Mondale, 4 delegates, and 1 alternate.

Paid for by C.D. 10 Delegates for Mondale Campaign Fund

1

3504050181 1

Exhibit #2

Front

LET'S ELECT 10 CD

WALTER MONDALE

4 — DELEGATES
and
1 — ALTERNATE

March 13th — Primary

Vote For *MONDALE* In Three Places On The Ballot

1. At The Top Of The Ballot ...
LOOK FOR ....

MONDALE

2. Delegates Committed To *MONDALE* .....
LOOK FOR....

R.L. Brumbough	(Mondale)
Juanita M. Geathers	(Mondale)
James P. Lacher	(Mondale)
Marlene Duffy Young	(Mondale)

3. Alternates Committed To *MONDALE* ....
LOOK FOR....

Margaret Chiefari	(Mondale)

Pd. for by 10 CD Delegates for Mondale.

8504050183

Back

8504050181 6

WALTER MONDALE

FOR PRESIDENT

As President, I will work with you to...

- ★ **Rebuild America**
- ★ **Provide a Sensible Foreign Policy**
- ★ **Pursue Nuclear Arms Control**
- ★ **Cut Reagan's Red Ink Deficits**
- ★ **Enact Health Care Cost Containment**
- ★ **Achieve Educational Excellence**
- ★ **Protect Our Fragile Environment**

I need your help. Please vote on **March 13th for the MONDALE** Delegates and Alternates.



Exhibit #3

Phone (305) 920-5693

Lloyds PRINTING Service

2321 Pembroke Road • Hollywood, Florida 33020

Established 1972
Union Label

Date March 5th, 1984

Our Inv. No. 1286

Your Inv. No.

Please return pink copy with check.

10th Congressional District
Richard L. Brumbaugh
655 East Pierce Street
Lake Alfred, FL 33850

Terms Net: PAYABLE UPON RECEIPT. A 1-1/2% per month service charge will be added to all delinquent accounts.

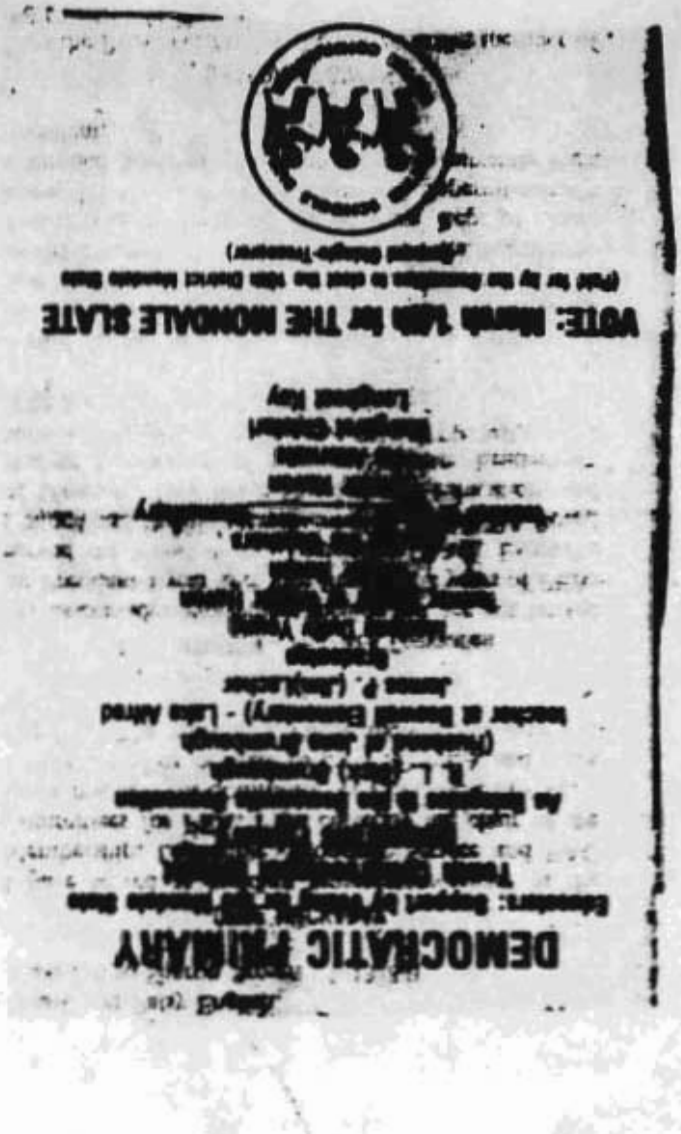
Quantity Ordered	Description	Amount	Total
	50,000 Mondale Cards, typeset, printed		$580.00
	$106 3/14/84 PRD	tax	29.00
			$609.00
	25,000 sent to Richard L. Brumbaugh		
	two packages 8.26 8.26		16.52
3/10/84	25,000 James P. Pacher		
	3 packages 5.10 8.26 6.38		19.74
	(Phone - I got Hold Bad.		$645.26

ORIGINAL INVOICE

Statements Are Not Mailed. Please Pay From This Invoice.

7 1 8 1 0 5 0 4 0 5 8

Exhibit #4



8504050181 9

[illegible] E. Smith
[illegible] 2nd Ave Dr [illegible]
[illegible], Florida 33529

- 8 1 9

RETURN RECEIPT
REQUESTED

CERTIFIED
P 624 032 760
MAIL

Federal Election Commission
1325 K St. NW
Washington, D.C. 20463

BRADENTON FL
JUN 4 JUN
U.S. POSTAGE
$57 2

pmk 37
cld. 75
Rec'd 6/6
1.72

RECEIVED AT THE
339
May 2
MUR 1667
Mears

Federal Elections Commission
1325 K St N.W.
Washington, D.C. 20463

Dear Mr Steel;

In reference to your letter dated May 11, 1984, I feel that no other action should be taken in this matter as noted by the enclosed material.

All funds raised were raised with the express purpose of the campaigning efforts of the Congressional District #10 Delegates for Mondale in expressing their desire to become delegates to the Democratic National Convention.

As you will note in my financial statement, all monies received were from private individuals with one exception. That being the donation from the International Brotherhood of Electrical workers P.A.C. 915 Tampa, Florida. This P.A.C. is a Federal registered P.A.C. The money from this P.A.C. fund was given to this committee in support of Mr James Lacher. It was used to support his candidacy and that of the other delegates, as Delegates for Mondale to the National Convention. It should be noted that Mr Lacher is a long time member of the I.B.E.W.

In reference to our statement of finance, I refer you to Exhibit #1.

#1. Delegate Slate Cards (handout)
#2. Delegates for Mondale (handout)
Item G on Financial Statement
#3. Receipt for above Literature

As noted, the printer has written Mondale Cards. These were not Mondale cards, but Mondale Delegate Cards as shown by Exhibit #2. Enclosed with this letter.

8504050180 20

I refer you to Item B, on my termination report. Mr Lacher qualified as a party Officer to be considered as a delegate for the National Democratic Convention, which constituted his trip to Tallahassee, Florida on May 5, 1984. He was to take part in the selection of State Delegates.

In closing, this should clear up this confusion, as all monies were spent for the promotion of our candidacy as delegates to the National Democratic Convention. Take note that all literature was paid by our Committee, and not by the National Mondale Campaign.

Sincerely Yours

Bernard E. Shingle

Bernard E. Shingle
5520 2nd Ave Dr West
Bradenton, Florida 33529
Treasurer C.D. #10
Delegates for Mondale

8504050182I

Exhibit #1

Reproduction of a handout we had printed for our candidates. The back of this card was blank as shown:

VOTE – March 13

☒ **Walter Mondale**
and delegates for Mondale:

☒ **R.L. Brumbaugh**
(Mondale)

☒ **Juanita M. Geathers**
(Mondale)

☒ **James P. Lacher**
(Mondale)

☒ **Marlene Duffy Young**
(Mondale)

Alternate

☒ **Margaret Chiefari**
(Mondale)

It is important to vote for all six names: Presidential candidate Mondale, 4 delegates, and 1 alternate.

Paid for by C.D. 10 Delegates for Mondale Campaign Fund

1

8504018220

Front of Card

Exhibit # 2

LET'S ELECT **10 CD**

WALTER MONDALE

4 — DELEGATES
and
1 — ALTERNATE

March 13th — Primary

Vote For *MONDALE* In Three Places On The Ballot

1. At The Top Of The Ballot ...
LOOK FOR ....

MONDALE

2. Delegates Committed To *MONDALE* .....
LOOK FOR....

R.L. Brumbough	**(Mondale)**
Juanita M. Geathers	**(Mondale)**
James P. Lacher	**(Mondale)**
Marlene Duffy Young	**(Mondale)**

3. Alternates Committed To *MONDALE* ....
LOOK FOR....

Margaret Chiefari	**(Mondale)**

3

Pd. for by 10 CD Delegates for Mondale

3504050182 3

Back of Card

WALTER MONDALE

FOR PRESIDENT

As President, I will work with you to...

- ★ **Rebuild America**
- ★ **Provide a Sensible Foreign Policy**
- ★ **Pursue Nuclear Arms Control**
- ★ **Cut Reagan's Red Ink Deficits**
- ★ **Enact Health Care Cost Containment**
- ★ **Achieve Educational Excellence**
- ★ **Protect Our Fragile Environment**

I need your help. Please vote on **March 13th for the MONDALE** Delegates and Alternates.



8504030182 1

Exhibit #3

8504050182 5



Established 1972
Union Label

Phone (305) 920-5893

Lloyds PRINTING Service

2321 Pembroke Road • Hollywood, Florida 33020

10th Congressional District
Richard L. Brumbaugh
655 East Pierce Street
Lake Alfred, FL 33850

Date March 5th, 1984

Our Inv. No. 1286

Your Inv. No.

Please return pink copy with check.

Terms Net: PAYABLE UPON RECEIPT. A 1-1/2% per month service charge will be added to all delinquent accounts.

Quantity Ordered	*Description*	*Amount*	*Total*
	50,000 Mondale Cards, typeset, printed $106 3/14/84 PAID	tax	$580.00 29.00 $609.00
	25,000 sent to Richard L. Brumbaugh two packages 8.26 8.26		16.52
	25,000 James P. Pacher 3 packages 5.10 8.26 6.38		19.74
			$645.26

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Statements Are Not Mailed. Please Pay From This Invoice.

[illegible] E. Shimle
[illegible] Ave Dr West
[illegible], Florida 33625

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Washington, D.C. 20463

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FEDERAL ELECTION COMMISSION
WASHINGTON DC 20463

May 11, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Bernard E. Shingle, Treasurer
Congressional District #10
Delegates For Mondale
5520 2nd Avenue DR West
Bradenton, FL 33529

Re: MUR 1667

Dear Mr. Shingle:

This letter is to notify you that on April 6, 1984 the Federal Election Commission received a complaint and supplements on April 18, April 27 and May 2, 1984, which allege that the committee and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). The complaint makes allegations against the Mondale for President Committee, Inc., and the delegate committees supporting Walter Mondale and, as such, you are being notified of this matter. A copy of the complaint and the supplements are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against the committee and you, as treasurer, in connection with this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you intend to be represented by counsel in this matter please advise the Commission by 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.

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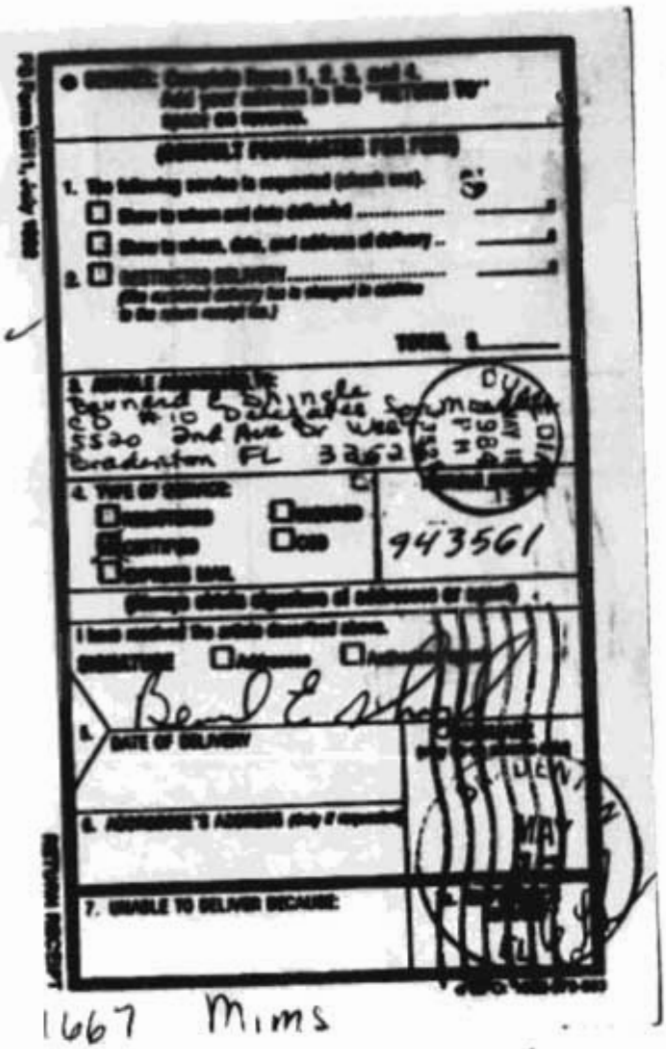
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

Enclosures
1. Complaint
2. Procedures
3. Designation of Counsel Statement



1667 Mims

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TELECOPY (305) 579-0717
WRITER'S DIRECT NO.

FEDERAL EXPRESS

June 25, 1984

Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20005

Re: Complaint of the National Right to Work Committee, et al v. Walter F. Mondale and Mondale for President Campaign Committee, et al, MUR-1704

Dear Commissioners:

Please accept the enclosed Affidavits as a supplemental filing to the response that was filed on behalf of certain Florida delegate committees in the above-referenced matter.

Very truly yours,

Stuart H. Singer

STUART H. SINGER

SHS/ch
Enc.

8504018220

BEFORE THE
FEDERAL ELECTION COMMISSION

NATIONAL RIGHT TO WORK COMMITTEE and RALPH MARTIN HETTINGA, JR., Complainants, v. WALTER F. MONDALE and MONDALE FOR PRESIDENT CAMPAIGN COMMITTEE, et al., Respondents.	MUR 1704 **AFFIDAVIT OF LAVAUNNE MILLER**

STATE OF FLORIDA)
) SS:
COUNTY OF DADE)

BEFORE ME, the undersigned authority, personally appeared, LAVAUNNE MILLER, who, after first being duly sworn, deposes and says that:

1. I am treasurer of the 9th Congressional Delegates for Mondale Committee.

2. That the 9th Congressional Delegates for Mondale Committee was formed and has been operated independent of the Mondale for President Committee and of other delegate committees supporting the candidacy of Mr. Mondale.

3. That upon formation, the 9th Congressional Delegates for Mondale Committee timely registered with the Federal Election Commission pursuant to 11 C.F.R. part 102 and 2 U.S.C. §433, and thereafter complied with 11 C.F.R. part 104 and 2

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U.S.C. §434 with respect to reporting contributions and expenditures.

4. That the only assistance provided by the Mondale campaign staff in the formation of the delegate committees is a memorandum provided by the Mondale for President Committee describing the laws and Commission regulations governing the primary election process to insure that all committees were in strict compliance with these regulations.

5. That the 9th Congressional Delegates for Mondale Committee has not accepted any contributions from union political action committees or from any other contributors in excess of the $5,000.00 contribution limit established by the Federal Election Campaign Act.

6. That the 9th Congressional Delegates for Mondale Committee was not at any time subject to control of the Mondale for President Committee or the Mondale Presidential Campaign with respect to any of its operations, including the contents of its campaign materials or the Committees' decisions regarding contributions.

7. That the 9th Congressional Delegates for Mondale Committee has never hired a Mondale campaign worker who has been laid off.

8. That the 9th Congressional Delegates for Mondale Committee has never contributed any money to the Mondale for President Committee or to any other delegate committees.

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9. That the 9th Congressional Delegates for Mondale Committee has not at any time accepted contributions from sources prohibited under the Federal Election Campaign Act or the regulations promulgated thereunder.

10. That the 9th Congressional Delegates for Mondale Committee has acted in full compliance with the Federal Election Campaign Act, the regulations of Federal Election Commission and has remained an independent organization unaffiliated with the Mondale for President Committee or with other delegate committees supporting Walter Mondale.

11. That the statements made herein are true and correct to the best of my knowledge.

FURTHER AFFIANT SAYETH NAUGHT.

LaVaunne Miller
LAVAUNNE MILLER

SWORN TO AND SUBSCRIBED before me this 21st day of June, 1984.

Carol Whitman
NOTARY PUBLIC
State of Florida at Large

My Commission Expires:

NOTARY PUBLIC, State of Florida
My Commission Expires Nov. 1, 1985

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June 19, 1984

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Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20005

Re: Complaint of the National Right to Work Committee, et al. v. Walter F. Mondale and Mondale For President Campaign Committee, et al., MUR 1704

Dear Commissioners:

This response is filed on behalf of Florida Delegate Committees which support the candidacy of Walter Mondale in the Fourth, Fifth, Eighth, Ninth, Northern Twelfth, Thirteenth and Fourteenth Congressional Districts and the South Florida Delegates for Mondale Committee and is being filed in opposition to the above-referenced complaint of the National Right to Work Committee and Ralph Martin Hettinga, Jr. filed on May 21, 1984. In its complaint, the National Right To Work Committee ("NRWC") asserts that a number of union-related political action committees have

evaded the contribution limits of the Federal Election Campaign Act by making contributions to delegate committees which NRWWC assets are affiliated with one another and with the Mondale for President Committee ("MPC"). The complainant requests that the Commission hold the independent Mondale delegate committees throughout the country, along with the MPC, to a single common contribution limitation.

For the reasons set forth below, we submit that the allegations presented by the complainant do not warrant further investigation by the Commission. Initially, we would urge the Commission to require a "high threshold" of proof before commencing such an investigation. Investigations of allegedly improper campaign activities, once launched, attract considerable public attention, notwithstanding the confidentiality provisions of the Federal Election Campaign Act, and may impact upon the presidential campaign itself. Indeed, creating such publicity may be a prime purpose behind the filing of this Complaint. Moreover, such investigations may infringe upon or "chill" the exercise of political expression and associational rights by grass roots groups such as the Florida delegate committees by enmeshing the committees in often protracted, costly and burdensome proceedings. Unless such investigations are carefully limited, they may hinder the very type of local volunteer activity which the Chair-

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man of the Commission has characterized as "the essence of healthy election campaigning," Federal Election Campaign Act Amendments of 1979, "Hearings before the Senate Committee on Rules and Administration," 96th Congress, 1st Sess. at 8 (1979), and which Congress has sought to encourage in enacting the coattails provisions of the Federal Election Campaign Act Amendments of 1979. 2 U.S.C. §431(8)(b)(i).[1/] The Commission has also acted to facilitate in the delegate selection process similar campaign activity to that encouraged in the general election by the statutory coattails provision. See FEC Explanation and Justification, 1 Federal Election Campaign Finance Guide (CCH), ¶ 864 at 1561-1567. The Commission's objective would be undermined if full scale investigations are undertaken upon such wide ranging and unconfirmed accusations of affiliation as those made in the NRWC Complaint. Although the Commission has not articulated the level of cause which must exist before proceeding to a formal investigation, at least in the context of grass roots campaign activity, the burden of proof upon a complainant should be substantial.

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1/ Under these provisions, candidates for public office, including presidential candidates, may coordinate grass roots campaigning without violating the Act.

I. THE FEDERAL ELECTION CAMPAIGN ACT DOES NOT PROHIBIT "AFFILIATION" AMONG COMMITTEES RECEIVING CONTRIBUTIONS.

The NRWC Complaint is predicated on 2 U.S.C. § 441a(a)(5), which states that all contributions made by political committees "established, financed, maintained, or controlled by [the same] person" shall be considered to have been made by a single political committee. NRWC, however, is not alleging affiliation among the contributing sources but rather among the recipient delegate committees. Neither 2 U.S.C. § 441a(a)(5), nor any other provision of the Act authorizes the Commission to treat contributions made to delegate committees as contributions made to the candidate. That the Commission should not assume such authority is implicit from § 441a(a)(7)(A) which states only that contributions made to a political committee "authorized by such candidate to accept contributions on his behalf" shall be considered as contributions made to the candidate. If Congress had intended to consider other contributions -- such as those involved here -- as contributions to the candidate, it would have so legislated.

This interpretation is supported by § 441a(a)(5)(A) which states that the "affiliation" provisions of that section do not limit "transfers between political committees of funds raised through joint fund raising efforts." Moreover, § 441a(a)(4) stipulates that the limitations on contributions "do not apply to transfers between and among political committees which are

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national, state, district or local committees (including any subordinate committee thereof) of the same political party," although clearly the activities of such committees are closely coordinated. The Supreme Court gave related provisions of the Act, allowing such transfers for Senatorial campaigns, an expansive interpretation in upholding the Commission's interpretation in Federal Election Comm. v. Democratic Senatorial Campaign Committee, 454 U.S. 27 (1981).

Not only did Congress not authorize the Commission to take the action complainant requests, but there is an obvious reason why delegate committees should not be subject to single contribution limits. Unless the committees do in fact coordinate their actions and exchange records, there is no way one delegate committee can determine whether a given contribution tendered to it violates the Act's contribution limits.

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II. FLORIDA DELEGATE COMMITTEES ARE NOT AFFILIATED WITH EACH OTHER OR WITH THE MONDALE FOR PRESIDENT COMMITTEE.

Florida delegate committees filing this response are independently established autonomous committees who are not affiliated either with other committees operating throughout the state and nation or with the MPC. Thus, even if the standards for affiliation for the purpose of the Act's contribution limitations set forth at 2 U.S.C. § 441a(a)(5) are relevant to this com-

plaint, the Florida delegate committees have not been so affiliated. The Commission has interpreted the general statutory standards set forth in § 441a(a)(5) by prescribing five factors to be used in determining whether committees are affiliated 11 C.F.R. § 100.5(g)(2)(ii): (1) ownership by one committee of a controlling interest in voting shares or securities in another committee; (2) provisions of by-laws, constitutions or other documents by which one committee has the authority, power or ability to direct another committee; (3) the authority, power or ability of one committee to hire, appoint, discipline, discharge, demote or remove or otherwise influence the decision of the officer or members of the other committees; (4) similar patterns of contributions by the committees in questions; and (5) the transfer of funds between committees which represent a substantial portion of the funds of the committees in question.

The allegations in the NRWC Complaint, even if accepted on their face, do not satisfy the Commission's affiliation criteria. Moreover, the Florida delegate committees on whose behalf this response is filed are not specifically mentioned by the allegations concerning affiliation. Until the complainant establishes that the affiliation standards have been met, there is no reason for a formal investigation. As documented by the attached

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affidavits,[2] the Florida delegate committees filing this response were established by delegates independently of the MPC. The formation of the committees, appointment of treasurers, the choice of a committee name, opening of a bank account and other actions were all performed independently by each committee. The delegate committees financed their operations through fund raisers and other means and controlled their own activities. The MPC enjoyed no control over the members of the committee.

Relying on various news accounts,[3] the complaint asserts that the national Modale staff "instructed" delegate committees on how to organize and operate, that Mondale staff were transfer-

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2/ Supporting affidavits on behalf of other committees will be forwarded as soon as possible as a supplemental filing to this response.

3/ For the most part, the news accounts relied upon in the complaint failed to meet the Commission's policy with regard to the opening of compliance actions on the basis of newspaper accounts. See Commission Memorandum No. 663 November 15, 1979. That policy requires a news account to be well documented, substantial, and to meet all of the requirements of a complaint in order to constitute a sufficient basis for an enforcement action. The news accounts relied upon in the NWRC complaint do not meet this standard. They are based on speculative and conclusory quotes which do not set forth a substantive statement of facts. For this reason, the allegations concerning the affiliation of delegate committees with each other and with the MPC based on newspaper articles do not create a sufficient basis for further investigation.

red to the delegate committees, that committees declined PAC contributions at Mr. Mondale's request, that the MPC's office of legal counsel was made available to advise delegate committees, that funds were transferred from a delegate committee in one state to a sister group in another, that certain registration statements for different committees were purportedly written by the same person and mailed in envelopes typed on the same typewriter and reported joint spending at the same print shops, and that delegate committees started disbanding after Walter Mondale requested them to do so. Each of these allegations is addressed below, and the response to these allegations is supported by sworn affidavits from the delegate committee treasurers.

1. The only assistance provided by the Mondale staff in the formation of the delegate committees filing this response was a memorandum provided by the MPC describing the laws and commission regulations governing the primary election process to insure that all committees were in strict compliance with these regulations. The provision of such legal assistance is expressly authorized by 2 U.S.C. § 431(8)(B)(ix).

2. The Florida delegate committees represented herein have not hired any MPC campaign workers.

3. Mr. Mondale's decision to request delegate committees supporting his candidacy not to accept PAC contributions hardly

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can be the basis for a finding of an affiliation among the committees and the MPC. In the first place, there is nothing whatever to suggest that the committees followed Mr. Mondale's direction in this regard. In Florida, at least, the primary had already been conducted at this time and contributions from any source, including political action committees, were no longer needed. A committee's decision not to accept further contributions hardly demonstrates that the delegate committees actions were being orchestrated by Mr. Mondale or the MPC. To the contrary, the delegate committees' earlier decisions to accept limited contributions from political action committee sources while Mr. Mondale had decided not to accept such contributions for the purposes of his own campaign illustrates the independence of decisionmaking between the MPC and the delegate committees.

4. The availability of legal advice to the delegate committees is not a basis on which affiliation may be found. Indeed, even the provision of legal advice regarding Commission regulations is not a basis upon which the Commission may find the delegate committees to have affiliated themselves with the national campaign. See 2 U.S.C. § 431(8)(B)(ix).

5. The delegate committees represented in this response have not contributed any money to the MPC or to any other delegate committees.

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6. The allegations concerning the use of a similar typewriter or printer, even if true, hardly support a finding of affiliation as set forth under the Commission's regulations.

7. The fact that some delegate committees disbanded after the purpose for which they were created -- the primary elections -- concluded is hardly surprising and is not indicative of any affiliation among the committees or affiliation with the national campaign.

In sum, the alleged coordination and control of the delegate committees by the Mondale campaign has not been established, at least with respect to the Florida delegate committees filing this response. Furthermore, the private investigatory reports discussed on page 6 of the complaint do not identify any of the Florida delegate committees filing this response as having been involved in any allegedly "affiliated" activity. For these reasons, there is no basis for concluding that the Mondale delegate committees are affiliates of the Mondale campaign and share a single limit on contributions that they may receive from any one source for the election.

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III. COMMISSION INTERPRETATIONS SHOULD BE INTERPRETED IN LIGHT OF THE DELEGATES' CONSTITUTIONAL RIGHTS TO POLITICAL ASSOCIATION THROUGH COMMITTEES.

The FEC is being asked to investigate committee activities which are fully subject to First Amendment protection. The organization of groups to participate in the political process lies at the core of the First Amendment rights of expression and association. As Chief Justice Burger stated for the Supreme Court in Citizens Against Rent Control v. City of Berkeley, 454 U.S. 290, 294 (1982):

> "[T]he practice of persons sharing common views banning together to achieve a common end is deeply embedded in the American political process. . . . The tradition of volunteer committees for collective action has manifested itself in myriad community and public activities; in the political process, it can focus on a candidate or on a ballot measure. Its value is that by collective effort, individuals can make their views known when, individually, their voices would be faint or lost."

Any interpretation of Commission regulations, or for that matter, any direct regulation either by this Commission or even by the Congress which infringed on the rights of individual delegates to campaign together through delegate committees would be constitutionally suspect:

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> Effective advocacy of both public and private points of view, particularly controversial ones, is undeniably enhanced by group association, as this Court has more than once recognized by remarking upon the close nexus between the freedoms of speech and assembly.

NAACP v. Alabama, 357 U.S. 449, 460 (1958); Buckley v. Valeo, 424 U.S. 1, 14 (1976); Citizens Against Rent Control v. City of Berkeley, 454 U.S. at 294; Federal Election Commission v. Florida for Kennedy Committee, 681 F.2d 1281, 1284-1285 (11th Cir. 1982). In Buckley v. Valeo, the Supreme Court made clear that:

> "The First Amendment protects political association, as well as political expression. The constitutional right of association explicated in NAACP v. Alabama, 357 U.S. 449 (1958), stems from the Court's recognition that "effective advocacy of both public and private points of view, particularly controversial ones, is undeniably enhanced by group association.' Subsequent decisions have made clear that the First and Fourteenth Amendments guarantee 'freedom to associate with others for the common advancement of political beliefs and ideas,' a freedom that encompasses 'the right to associate with the political party of one's choice.' Kusper v. Pontikes, 414 U.S. 51, 56 (1973), quoted in Cousins v. Wigoda, 419 U.S. 477, 487 (1975)."

Because of the importance of free expression and association rights in the context of political campaigns, the Supreme Court in Buckley invalidated limitations on campaign expenditures, and upheld restrictions on contributions only because they were care-

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fully limited to the single interest that the court found legitimate in this area: the perception of undue influence created by large contributions to a candidate.[4/]

Activities by a political party in the primary process are even further insulated from government intrusion. In Democratic Party of the United States v. Wisconsin, 450 U.S. 119, the court held that members of the National Democratic Party's associational rights to determine who could participate in the processes leading to the selection of delegates at a national convention could not be limited by Wisconsin's interests in forcing the National Party to honor primary results. In so holding, the court followed its earlier holding in Cousins v. Wigoda, 419 U.S. 477, that state law did not have primacy over national political party's rules in determination of the qualifications and eligibility of delegates to the National Party's Convention. The court stated that "Illinois' interest in protecting the integrity of its electoral process cannot be compelling in the context of the selection of delegates to the National Party Convention."

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4/ As the Supreme Court has subsequently stated, "Buckley identified a single narrow exception to the rule that limits on political activity were contrary to the First Amendment. The exception relates to the perception of undue influence of large contributions to a candidate." Citizens Against Rent Control v. City of Berkeley, 454 U.S. at 297 (emphasis in original).

Id. at 491. The Cousins court relied upon the principle that "the National Democratic Party and its adherents enjoy a constitutionally protected right of political association." Id. at 487. For the reasons articulated in these cases, the Commission should be particularly hesitant before launching investigations into primary campaign activities which are, after all, essentially matters for the Democratic Party to resolve.

The constitutional implications of any commission regulation of political activities by delegate committees are clear. First, the constitutionally permissible scope of any regulation of delegate committee activities is limited by the Supreme Court's decision in Buckley to the single possibility of the perception of undue influence through contributions to a candidate. Conducting a full scale investigation on other issues is pointless, given the Supreme Court's Buckley ruling. Second, the investigation itself raises significant constitutional questions. By forcing the disclosure of committee workings, and enmeshing the committees in an investigation, the Commission risks infringing and chilling the rights of delegates to form committees to advance their cause. An investigation into the activities of the Florida Mondale Delegate Committees and other delegate committees supporting any candidate, should only be undertaken when there is far stronger evidence of misconduct than that which has been

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presented in this Complaint. In Federal Election Commission v. Florida Committee, 681 F.2d 1281 (11th Cir. 1982), the Court of Appeals recognized that:

> "A higher degree of scrutiny must attach before courts can compel disclosure of information that may impinge upon First Amendment associational rights."

Federal Election Commission v. Mechanists Non-Particant Political League, 665 F.2d 380 (D.C. Cir.), cert. denied, 454 U.S. 897 (1981). The Court of Appeals followed the Supreme Court's holding in Sweezy v. New Hampshire, 354 U.S. 234, 245 (1957), that:

> "It is particularly important that the exercise of the power of compulsory process be carefully circumscribed when the power of compulsory process tends to impinge upon such highly sensitive areas as freedom of speech or press, freedom of political association and freedom of communication of ideas. . . ."

While the Supreme Court upheld the constitutionality of the $5,000 contribution limit for committees in California Medical Association v. Federal Election Commission, 453 U.S. 182 (1981), that decision does not authorize the Commission to take an expansive view of the affiliation standards which would effectively nullify the opportunity provided under the Federal Election Campaign Act for individuals to form delegate committees in support of their own election as delegates to the National convention.

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IV. UNCERTAINTIES ABOUT THE ROLE OF UNION-RELATED PAC CONTRIBUTIONS TO DELEGATE COMMITTEES SHOULD BE ADDRESSED THROUGH THE COMMISSION'S RULE MAKING POWERS.

An investigation of delegate committees may well create political effects and ramifications on the presidential campaign. Walter Mondale has stated that he will take steps to refund contributions made to disputed delegate committees supporting his presidential campaign. In light of this action by Mr. Mondale, and by the reality that the presidential primary process for the 1984 campaign is at an end, there is no urgency for the Commission to undertake an investigation at this time which may create possible ramifications on the candidates and the general election campaign.

Ironically, the only way independent delegate committees could monitor political action committee contributions to ensure that the aggregate amount contributed by a single union-related PAC did not exceed the Act's limits would be to engage in the type of affiliated activity that the NRWC protests in this complaint. If the Commission believes it necessary, it should resolve the tension between the affiliation rules and the contribution limits through its rulemaking authority. As the law is currently written, individual delegate committees are not responsible for contributions that may be made to and received by other delegate committees. For this reason alone, there is no basis

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for subjecting the delegate committees to a formal investigation into the allegations of this complaint.

CONCLUSION

For the foregoing reasons, the Fourth, Fifth, Eighth, Ninth, Twelfth, Thirteenth and Fourteenth Congressional District Delegates for Mondale Committees, and the South Florida Delegates for Mondale Committee, urges that the Commission should find no reason to believe that a violation under the Federal Election Campaign Act has occurred.

Respectfully submitted,

GREENBERG, TRAURIG, ASKEW,
HOFFMAN, LIPOFF, ROSEN &
QUENTEL, P.A.

By: Marlene K. Silverman
MARLENE K. SILVERMAN

Stuart H. Singer
STUART H. SINGER

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BEFORE THE
FEDERAL ELECTION COMMISSION

NATIONAL RIGHT TO WORK COMMITTEE and RALPH MARTIN HETTINGA, JR., Complainants, v. WALTER F. MONDALE and MONDALE FOR PRESIDENT CAMPAIGN COMMITTEE, et al., Respondents.	MUR 1704 AFFIDAVIT OF GEORGE E. COMERFORD

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STATE OF FLORIDA)
) SS:
COUNTY OF DADE)

BEFORE ME, the undersigned authority, personally appeared, GEORGE E. COMERFORD, who, after first being duly sworn, deposes and says that:

1. I am treasurer of the 14th Congressional District Delegates for Mondale Committee.

2. That the 14th Congressional District Delegates for Mondale Committee was formed and has been operated independent of the Mondale for President Committee and of other delegate committees supporting the candidacy of Mr. Mondale.

3. That upon formation, the 14th Congressional District Delegates for Mondale Committee timely registered with the Federal Election Commission pursuant to 11 C.F.R. part 102 and 2 U.S.C. §433, and thereafter complied with 11 C.F.R. part 104 and 2 U.S.C. §434 with respect to reporting contributions and expenditures.

4. That the only assistance provided by the Mondale campaign staff in the formation of the delegate committees is a memorandum provided by the Mondale for President Committee describing the laws and Commission regulations governing the primary election process to insure that all committees were in strict compliance with these regulations.

5. That the 14th Congressional District Delegates for Mondale Committee has not accepted any contributions from union political action committees or from any other contributors in excess of the $5,000.00 contribution limit established by the Federal Election Campaign Act.

6. That the 14th Congressional District Delegates for Mondale Committee was not at any time subject to control of the Mondale for President Committee or the Mondale Presidential Campaign with respect to any of its operations, including the contents of its campaign materials or the Committees' decisions regarding contributions.

7. That the 14th Congressional District Delegates for Mondale Committee has never hired a Mondale campaign worker who has been laid off.

8. That the 14th Congressional District Delegates for Mondale Committee has never contributed any money to the Mondale for President Committee or to any other delegate committees.

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9. That the 14th Congressional District Delegates for Mondale Committee has not at any time accepted contributions from sources prohibited under the Federal Election Campaign Act or the regulations promulgated thereunder.

10. That the 14th Congressional District Delegates for Mondale Committee has acted in full compliance with the Federal Election Campaign Act, the regulations of Federal Election Commission and has remained an independent organization unaffiliated with the Mondale for President Committee or with other delegate committees supporting Walter Mondale.

11. That the statements made herein are true and correct to the best of my knowledge.

FURTHER AFFIANT SAYETH NAUGHT.

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George E. Comerford
GEORGE E. COMERFORD

SWORN TO AND SUBSCRIBED before me this 15 day of June, 1984.

Robert L. Young
NOTARY PUBLIC
State of Florida at Large

My Commission Expires:

Notary Public, State of Florida
My Commission Expires [illegible] 1988

BEFORE THE
FEDERAL ELECTION COMMISSION

NATIONAL RIGHT TO WORK COMMITTEE and RALPH MARTIN HETTINGA, JR., Complainants, v. WALTER F. MONDALE and MONDALE FOR PRESIDENT CAMPAIGN COMMITTEE, et al., Respondents.	MUR 1704 AFFIDAVIT OF CALVIN D. DEVONEY

STATE OF FLORIDA)
) SS:
COUNTY OF DADE)

BEFORE ME, the undersigned authority, personally appeared, CALVIN D. DEVONEY, who, after first being duly sworn, deposes and says that:

1. I am treasurer of the 4th Congressional District Delegates for Mondale Committee.

2. That the 4th Congressional District Delegates for Mondale Committee was formed and has been operated independent of the Mondale for President Committee and of other delegate committees supporting the candidacy of Mr. Mondale.

3. That upon formation, the 4th Congressional District Delegates for Mondale Committee timely registered with the Federal Election Commission pursuant to 11 C.F.R. part 102 and 2 U.S.C. §433, and thereafter complied with 11 C.F.R. part 104 and 2 U.S.C. §434 with respect to reporting contributions and expenditures.

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4. That the only assistance provided by the Mondale campaign staff in the formation of the delegate committees is a memorandum provided by the Mondale for President Committee describing the laws and Commission regulations governing the primary election process to insure that all committees were in strict compliance with these regulations.

5. That the 4th Congressional District Delegates for Mondale Committee has not accepted any contributions from union political action committees or from any other contributors in excess of the $5,000.00 contribution limit established by the Federal Election Campaign Act.

6. That the 4th Congressional District Delegates for Mondale Committee was not at any time subject to control of the Mondale for President Committee or the Mondale Presidential Campaign with respect to any of its operations, including the contents of its campaign materials or the Committees' decisions regarding contributions.

7. That the 4th Congressional District Delegates for Mondale Committee has never hired a Mondale campaign worker who has been laid off.

8. That the 4th Congressional District Delegates for Mondale Committee has never contributed any money to the Mondale for President Committee or to any other delegate committees.

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9. That the 4th Congressional District Delegates for Mondale Committee has not at any time accepted contributions from sources prohibited under the Federal Election Campaign Act or the regulations promulgated thereunder.

10. That the 4th Congressional District Delegates for Mondale Committee has acted in full compliance with the Federal Election Campaign Act, the regulations of Federal Election Commission and has remained an independent organization unaffiliated with the Mondale for President Committee or with other delegate committees supporting Walter Mondale.

11. That the statements made herein are true and correct to the best of my knowledge.

FURTHER AFFIANT SAYETH NAUGHT.

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CALVIN D. DEVONEY

SWORN TO AND SUBSCRIBED before me this 15 day of June, 1984.

NOTARY PUBLIC
State of Florida at Large

My Commission Expires:

Notary Public, State of Florida
My Commission Expires Oct. 11, 1987

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FEDERAL ELECTION COMMISSION
'84 JUN 5 P 3:50
GCC# 2476

June 4, 1984

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Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20005

Re: Complaint of Americans with Hart, Inc. v. Mondale for President Committee, Inc. filed April 6, 1984, MUR 1667

Dear Commissioners:

This response is filed on behalf of Florida delegate committees which support the candidacy of Walter Mondale in the Fourth, Eighth, Ninth and Fourteenth Congressional Districts and the South Florida Delegates for Mondale Committee and is being filed in opposition to the above-referenced Complaint of Americans with Hart, Inc. filed on April 6, 1984 and subsequently supplemented or amended on April 18, April 27, May 2 and May 22, 1984. In its Complaint, the Hart Committee asserts that delegate committees may not make expenditures for grass roots campaign activities on the terms available to delegates when they act individually. The Hart Committee also requests that the Federal

Election Commission ("Commission") rule that all committees established by Mondale delegates are affiliated with one another and with the Mondale for President Committee ("MPC"). In this way, the complainant attempts to subject the delegates, along with the MPC, to a common contribution and expenditure limitation.

For the reasons set forth below, we submit that the allegations presented by Americans with Hart, Inc. do not warrant further investigation by the Commission. Initially, we would urge the Commission to require a "high threshold" of proof before commencing such an investigation. Investigations of allegedly improper campaign activities, once launched, attract considerable public attention, notwithstanding the confidentiality provisions of the Federal Election Campaign Act, and may impact upon the presidential campaign itself. Indeed, creating such publicity may be a prime purpose behind the filing of this Complaint. Moreover, such investigations may infringe upon or "chill" the exercise of political expression and associational rights by grass roots groups such as the Florida delegate committees by enmeshing the committees in often protracted, costly and burdensome proceedings. Unless such investigations are carefully limited, they may hinder the very type of local volunteer activity which the Chairman of the Commission has characterized as

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"the essence of healthy election campaigning," Federal Election Campaign Act Amendments of 1979, "Hearings before the Senate Committee on Rules and Administration," 96th Congress, 1st Sess. at 8 (1979), and which Congress has sought to encourage in enacting the coattails provisions of the Federal Election Campaign Act Amendments of 1979. 2 U.S.C. §431(8)(b)(i).[1/] The Commission has also acted to facilitate in the delegate selection process similar campaign activity to that encouraged in the general election by the statutory coattails provision. See FEC Explanation and Justification, 1 Federal Election Campaign Finance Guide (CCH), ¶ 864 at 1561-1567. The Commission's objective would be undermined if full scale investigations are undertaken upon such wide ranging and unconfirmed accusations as those made in the Hart Committee Complaint. Although the Commission has not articulated the level of cause which must exist before proceeding to a formal investigation, at least in the context of grass roots campaign activity, the burden of proof upon a complainant should be substantial.

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1/ Under these provisions, candidates for public office, including presidential candidates, may coordinate grass roots campaigning without violating the Act.

I. THE HART COMMITTEE COMPLAINT FAILS TO MEET THE SPECIFICITY REQUIREMENTS ESTABLISHED BY THE COMMISSION.

The Federal Election Campaign Act, 2 U.S.C. §437G(a)(1), and Commission regulations promulgated thereunder, 11 C.F.R. §111.4, require, inter alia, that a complaint must clearly identify as a respondent each person or entity who is alleged to have committed a violation. 11 C.F.R. §111.4. None of the allegations submitted in the Hart Committee's Complaint, or the supplements thereto, have identified any activities conducted by the Fourth, Eighth, Ninth or Fourteenth Congressional District's Delegates for Mondale Committees or the South Florida Delegates for Mondale group. Indeed the only allegations directed at any Florida committees in the Complaint are vague charges that funds were transferred by New Hampshire committee to several Florida committees and that three Florida committees happened to use the same commercial printer in Hollywood, Florida. Not only do these allegations fail to constitute violations of the Federal Election Campaign Act or regulations promulgated thereunder, but neither the Complaint nor the underlying source identifies the Florida delegate committees which purportedly have received impermissible contributions or have improperly coordinated their activities. This is a fatal defect in the Complaint which should lead the Commission to take no further action at this time. It is precisely such open-ended allegations as these which require far-

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ranging investigations threatening the confidentiality of the investigatory process and interfering with the associational rights of the delegates.

Furthermore, the Hart Complaint is based on inaccurate and undocumented newspaper articles which fail to meet the Commission's policy with regard to the opening of compliance actions on the basis of newspaper accounts. See Commission Memorandum No. 663 (November 15, 1979). That policy requires a news account to be well documented, substantial, and to meet all of the requirements of a complaint in order to constitute a sufficient basis for an enforcement action. The news accounts relied upon in the Hart Complaint do not meet this standard. They are based on speculative and conclusory quotes which do not set forth a substantive statement of facts. For this reason the allegations set forth in the Hart Complaint, particularly those allegations concerning the affiliation of delegate committees with each other and with the MPC, do not create a sufficient basis for further investigation.

The Florida delegate committees filing this response have fully complied with the Federal Election Campaign Act and the Commission's regulations. If and when a complaint is filed which alleges violations by one of the Florida delegate committees filing this response, said committee will welcome the opportunity to demonstrate to the Commission that the allegation is bareless.

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II. THE HART COMPLAINT IS BASED ON AN ERRONEOUS VIEW OF THE COMMISSION'S DELEGATE COMMITTEE REGULATIONS.

A. Delegates, Acting Through A Committee, May Make Expenditures For Volunteer Activities On The Same Terms Available When Delegates Act Individually.

The Commission's Regulations, §110.14, deal with contributions to and expenditures by delegates. The regulations entitle all delegates to spend unlimited amounts for advocating their own selection and for volunteer campaign materials which promote both delegates and their presidential candidate, as long as such materials are used in volunteer activities and do not involve general public advertising. The applicability of these provisions to delegate committees is reflected in the language in these very rules requiring delegates who exercise these rights through committees to register and report with the Commission. The rule also makes clear that committees must observe the Federal Election Campaign Act's limits when making or receiving contributions. The regulation does not, however, establish any limitations on expenditures for delegate committees. It follows that all delegates, whether acting individually or through committees may make the exempt expenditures allowed under §110.14(d)(1). The Commission was certainly aware of the fact that delegate committees would make such expenditures, and would have spelled out such restrictions if they were intended.

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The Commission's summary of rules pertaining to delegate committee expenditures confirms this interpretation. The Commission stated that all expenditures by delegate committees are reportable, and "an expenditure for public political advertising which advocates the selection of a delegate which also refers to a presidential primary candidate is considered either an allocable in-kind contribution or an allocable independent expenditure on behalf of the presidential candidate." FEC Record, December 1983. No other limitation for delegate committee expenditures is stated. Accordingly, delegate committees enjoy the rights afforded to individual delegates to make expenditures advocating their selection in supporting their presidential candidate, as long as such expenditures are limited to volunteer campaign materials. Moreover, any other interpretation would discourage the team campaigning that Congress and the Commission sought to encourage in enacting the coattail provisions enacted in the Federal Election Campaign Act of 1979. 2 U.S.C. §431(8)(b)(xi); 11 C.F.R. §100.7(b)(16).

Neither the Hart Committee Complaint, nor anything in the regulatory history of the regulations at issue suggest any policy reason for treating delegate committees differently than individual delegates. Clearly, the delegate committees are not a "scheme" to evade the contribution and expenditure limitations.

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Under the regulations, individual delegates may raise and spend unlimited amounts on volunteer campaign materials without any disclosure. Second, contributions for individual delegates are not subject to any limitations when made by a political committee and are subject only, to a $25,000 limitation when made by individuals. If the MPC had intended to follow a scheme to evade the contribution and expenditure limitations, as the Hart Committee Complaint suggests, using individual delegates - who need not even register and report, unlike delegate committees - would have been a far easier path.

B. Delegate Committees Are Not Affiliated With Each Other Or With The Mondale For President Committee.

Florida delegate committees represented in this response are independently established autonomous committees who are not affiliated either with other committees operating throughout the state and nation or with the MPC. The standards for affiliation for the purpose of the Act's contribution limitations are set forth at 2 U.S.C. §441A(a)(5). That section states that all contributions made by political committees "established, financed, maintained or controlled by [the same] person" shall be considered to have been made by a single political committee. The Commission has interpreted the general statutory standards set forth in §441A(a)(5) by prescribing five

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factors to be used in determining whether committees are affiliated 11 C.F.R. §100.5(g)(2)(ii): (1) ownership by one committee of a controlling interest in voting shares or securities in another committee; (2) provisions of by-laws, constitutions or other documents by which one committee has the authority, power or ability to direct another committee; (3) the authority, power or ability of one committee to hire, appoint, discipline, discharge, demote or remove or otherwise influence the decision of the officer or members of the other committees; (4) similar patterns of contributions by the committees in questions; and (5) the transfer of funds between committees which represent a substantial portion of the funds of the committees in question.

The allegations in the Hart Committee Complaint, even if accepted on their face, do not satisfy the Commission's affiliation criteria. Moreover, the Florida delegate committees, on whose behalf this response is filed, are not even mentioned. Until the complainant establishes that the affiliation standards have been met, there is no reason for a formal investigation. The Florida delegate committees filing this response were established by delegates independently of the MPC. The formation of the committees, appointment of treasurers, the choice of a committee name, opening of a bank account and other actions were all performed independently by each committee. The delegate com-