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

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MEMORANDUM PURSUANT TO 11 C.F.R. §111.6(a) SETTING FORTH REASONS WHY THE COMMISSION SHOULD TAKE NO ACTION ON AND DISMISS THE COMPLAINT AGAINST RESPONDENT UNITED MINE WORKERS OF AMERICA COAL MINERS POLITICAL ACTION COMMITTEE

I.

STATEMENT OF THE CASE

On May 18, 1984, The National Right to Work Committee and Ralph Martin Hettinga, Jr., filed a complaint with the Federal Election Commission against Walter F. Mondale, the

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Mondale for President Campaign Committee and thirteen political action committees of labor organizations, alleging certain violations of the Federal Election Campaign Act of 1971, as amended. The United Mine Workers of America Coal Miners Political Action Committee ("COMPAC"), a named Respondent, submits this memorandum, pursuant to 11 C.F.R. §111.6(a), setting forth reasons why the Commission should take no action and dismiss the complaint as to COMPAC.

Attached hereto as Appendix I is the sworn verification of John J. Banovic, Treasurer of COMPAC, as to factual matters contained herein.

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II.

ARGUMENT

A complaint filed pursuant to 2 U.S.C. §437g(a)(1) alleging a violation of the Federal Election Campaign Act of 1971, as amended ("the Act"), should contain a clear and concise recitation of the facts which describe a violation of the statute or regulation over which the Commission has jurisdiction. 11 C.F.R. §111.4(d)(3). Obviously, a complaint should contain equally clear and concise recitations of facts describing violations by each named Respondent. The Complainants have failed to recite any facts describing <u>any</u> violation of any statute or regulation by Respondent COMPAC. This memorandum addresses each of the allegations which directly or indirectly implicate COMPAC in any claimed wrongdoing. In each instance, the Complainants

have either failed to allege any violations by COMPAC as a matter of law or they have failed to clearly and concisely recite any facts which constitute a violation of the Act. Further action by the Commission is therefore unwarranted and the complaint should be dismissed as to COMPAC.

The complaint is a "shotgun" attack on a variety of labor supported political organizations. Allegations and propounded supporting evidence differ for each named labor PAC. There is no credible support for any allegations against COMPAC. No evidence is offered that COMPAC operated in concert with any other PAC or organization.

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A. Complainants have not recited any facts which demonstrate that Respondent COMPAC knowingly and/or willingly funneled excessive contributions to the Mondale Campaign through Mondale delegate Committees.

In their Complaint (p.3), Complainants allege that all Respondents "have engaged in a concentrated effort to circumvent contribution limitations established by Congress....by funneling excessive contributions through Mondale 'delegate committees' which, in actuality, have been branch offices of the Mondale Campaign." This allegation is apparently an assertion that COMPAC knowingly and willfully violated §§441a(a)(2)(A) and 441a(f) of the Act by conspiring with other respondents to effec-

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tively contribute more than $5,000 to the Mondale Campaign. The crux of this allegation is that COMPAC knew the delegate committees were controlled, maintained, established and financed by the Mondale Campaign. See 11 C.F.R. §100.5(g)(2). Yet the Complainants have failed to establish any basis for concluding either that COMPAC knew the Mondale delegate committees were affiliated with the Mondale Campaign or that COMPAC willfully violated the law by channelling contributions in excess of the legal limit to Mondale through those delegate committees.

The mere allegation of wrongdoing by a third party is not enough to trigger the investigative and prosecutorial powers of the Commission. Potential respondents are protected from baseless and frivolous charges by the Commission's regulations which reasonably demand that such charges be based on "a clear and concise recitation of any facts which describe" any violation. See 11 C.F.R. §111.4(d)(3).[1/] There is no "clear" description of any legal violation by COMPAC. The alleged participation by COMPAC in a concerted effort to circumvent the law's limits on contributions presupposes knowledge and/or willingness on the part of the respondent. There being no recitation of facts demonstrating either a knowing or willful effort to avoid the statutory limit on contributions, the Complainants have clearly failed to describe a violation.

1/ "Clear" means plain, evident, obvious, free from doubt or conjecture, beyond reasonable doubt. Richard v. Western Fire Insurance Co., 161 F. Supp. 115, 118 (D. Minn. 1958).

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B. The Respondent Union PAC's are not affiliated within the meaning of 11 C.F.R. §100.5(g) and are therefore not subject to a single contribution limit.

The complaint alleges that "[t]he evidence further demonstrates that Respondent union PACs have coordinated their efforts to support Mondale's delegate committees" and have engaged in similar patterns of contributions to the 'delegate committees,' which establish that the union PACs are and have been affiliated within the meaning of 11 C.F.R. §100.5(g)." (Complaint, pp. 4 and 25.)

Committees are deemed to be affiliated if they are established, financed, maintained or controlled by the same organization or committee. 11 C.F.R. §100.5(g)(2). (Complaint, pp. 4 and 25.) Complainants, however, have not introduced any evidence suggesting that COMPAC is or has been "established, financed, maintained, or controlled" by any organization other than the United Mine Workers of America.

While the complaint alleges that AFL-CIO COPE (p. 24) has coordinated contributions with fifteen or sixteen union PAC's, there is no specific allegation of COMPAC involvement in such coordination.2/ In fact, there is no specific description

2/ Underlying Complainants' approach is an inference that because a variety of labor-sponsored political committees are all supporting national nominating convention delegates committed to one candidate, there is some impermissible collusion involved. In fact, various independent and autonomous units of separate and distinct unions are merely independently supporting delegates and delegate slates often

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of COMPAC's coordination with any other PAC in making contributions to the delegate committees. The only facts offered by Complainants consist of a list of six contributions to various Mondale delegate committees in five states made between February 16, 1984 and March 21, 1984. Rather than indicating any inpropriety, the simultaneous contributions by various labor PAC's to delegate committees merely and obviously coincide with the statutory dates for nominating primaries and the beginning of the caucus process in particular states.3/ To conclude from the facts recited in the complaint that COMPAC coordinated its contributions with other PAC's amounts to pure conjecture and speculation. The dates of the primaries and caucuses alone dictated when contributions were made. The overlap of COMPAC contributions with many of the contributions of other PAC's is instead merely the result of the fact that many primaries and caucuses occurred in March and April.4/

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including members of the accrued unions, committed to former Vice President Mondale, who has long been identified with support of labor issues, and who was elected to the U.S. Senate from Minnesota as a candidate of the Democratic Farm-Labor Party. (Emphasis supplied)

3/ New Hampshire: February 28, 1984 (primary).
Illinois: March 21, 1984 (primary).
Pennsylvania: April 10, 1984 (primary).
Virginia: April 24, 1984 (caucus).
Kentucky: April 31, 1984 (caucus).

4/ The complaint urges that COMPAC's four $5,000 contributions to delegate committees on March 21, 1984, is suggestive of wrongdoing. But the timing of the contributions merely suggests that COMPAC approved the delegate committee contributions on the same day and made a policy decision to give maximum donations to certain delegate committees. The Complainants also suggest that these donations were coordi-

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Finally, the Complainants are required to submit, along with their complaint, "any documentation supporting the facts alleged if such documentation is known of, or available to, the Complainant." 11 C.F.R. §111.4(d)(4) (emphasis supplied). The Complainants have failed to document, either by exhibit or by reference, facts establishing some coordination between COMPAC and other union-PAC's. Their failure to provide such documentation must be taken to mean that no such documentation exists.

Even if Complainants were to factually document some cooperation or coordination between COMPAC and the political committee of another labor organization, which they clearly do not, they will not have described a violation of the Act.5/

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nated with other labor PAC's. See Complaint, pp. 22-23. Such coordination is not a per se violation of the Act and absent findings of control, authority, or the transfer of substantial portion of funds, PAC's which coordinate occasional contributions are not deemed to be affiliated. In fact, such coordination is an exercise of association guaranteed by the First Amendment to the Constitution. Cousins v. Wigoda, 409 U.S. 1201 (1972).

5/ While "similar patterns of contributions" is one of the indicia used to determine if two or more ostensibly independent political committees are under the control of the same organization (See 11 C.F.R. §110.3(a)(1)(iii)), there is no prohibition against PAC's making parallel decisions as to where their contributions and expenditures will have optimum political impact. In Advisory Opinion 1976-104, two committees were deemed to be affiliated because one contributed approximately 40% of its receipts to the other and a "similar pattern of contribution," was found to have been made with approximately 67% of the first committee's remaining receipts. CCH ¶¶5255. In other words, a single PAC was found to exist because approximately 80% of the first committee's contributions were made to or in conjunction with the other committee. COMPAC's election year receipts to date have totalled approximately $900,000. The $30,000 alleged to have been made in cooperation with other Union-PACs constitutes only 3.3% of COMPAC's total receipts.

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The right to engage in "vigorous advocacy" of candidates for federal office is no less a First Amendment right than is the right to engage in abstract discussion of the relative merits of candidates, Buckley v. Valeo, 424 U.S. 1, 48 (1976). This First Amendment right, which extends to groups as well as individuals, encompasses group contributions. In order that advocacy be "optimally effective" it is sometimes necessary to "pool money" and efforts. 424 U.S. at 65 to 66. While contributions out of pooled funds is appropriately subject to statutory limitations, group members may express the will of the group by making donations in their individual capacity. For example, members of an association or trade union, as well as directors of a corporation, may not collectively make contributions on behalf of candidates for federal office, yet they may collectively discuss political candidates and issues with the object of deciding which causes they will support by their individual contributions. See California Medical Association v. F.E.C., 641 F.2d 619, 627 (9th Cir. 1980), affirmed, 453 U.S. 182 (1981).

Complainants have therefore not only failed to recite any facts which demonstrate an affiliation between COMPAC and any of the other named Respondents, they have failed, as well, to allege a violation of a statute or regulation over which the Commission has jurisdiction.

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C. COMPAC has not violated the contribution limits of the Act by giving more than $5,000 to Mondale.

Section 441a(a) of the Act establishes limitations on contributions to political committees engaged in the support of candidates for federal office. 2 U.S.C. §§441a(a)(1)(C), 441a(a)(2)(C). The Act also establishes a scheme of civil penalties to be imposed when these limitations are violated. 2 U.S.C. §437g(a). The Act essentially establishes a two-tiered scheme of enforcement, one for those violations which are knowing and willful and another for those which are per se.

The complaint alleges both kinds of violations and seeks Commission enforcement at each level of the two-tiered scheme. The complaint should be dismissed as to both allegations of per se violations and willful and knowing violations.

1. Complainants have failed to recite any facts describing willfulness or knowledge on the part of COMPAC that it was violating the law.

Complainants allege that the various union-PAC's knowingly and willfully violated the contribution limits of the Act (Complaint, pp. 25-26). The regulations, however, require the charging party to clearly and concisely recite facts which describe a violation. 11 C.F.R. §111.4(d)(3). In other words, the regulations require the complainants to do more than allege a

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violation; they require a clear and concise factual description of that violation.

The complaint in the instant proceeding is devoid of any facts describing knowledge on the part of COMPAC that the Mondale Campaign and the delegate committees to which it contributed were in fact one committee. Nor are there any facts recited which describe any willfulness by COMPAC to violate any contribution limitation established by the Act. Due to the Complainants' failure to provide the factual background necessary to trigger a Commission investigation of a willful and knowing violation, the Commission should take no action on the complaint insofar as it alleges willfulness and knowledge by COMPAC.

2. The Complaint fails to describe a per se violation.

The complaint alleges that the Mondale Campaign and the Mondale delegate committees to which COMPAC contributed are affiliated and, as a result, COMPAC's contributions in excess of $5,000 to those delegate committees constitute a violation of the Act. (Complaint, pp. 24-25.) Conceivably, if it were true that the Mondale Campaign and the delegate committees to which COMPAC contributed were affiliated, then COMPAC's multiple contributions might constitute a violation of the Act, regardless of COMPAC's knowledge or willfulness. See 2 U.S.C. 437g(a). However, there is no recitation whatsoever of any facts which

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establish that the delegate committees to which COMPAC contributed are affiliated.6/

The Commission has issued regulations setting forth the criteria to be used in assessing whether committees are affiliated. If a committee is "established, financed, maintained, or controlled" by another committee, then both committees are deemed to be affiliates and a single contribution limit applies to the aggregate of money donated by a person to both committees. 11 C.F.R. §100.5(g)(2). The Commission has also promulgated indicia to be used in determining whether or not one committee is controlled, established, maintained, or financed by another. They are:

(A) Ownership of a controlling interest;

(B) Provisions of by-laws, constitutions, or other documents by which one entity has authority, power, or ability to direct the other entity;

(C) The authority, power, or ability to hire, discipline, discharge, demote, or remove or otherwise influence the decisions of the officers or members of an entity;

(D) Similar patterns of contributions;

(E) The transfer of funds between committees which represent a substantial portion of funds of either the transferor or the transferee committee.

11 C.F.R. §110.3(a)(1)(iii).

6/ Considerable concern must also be expressed as to how a court would review any statute imposing per se violations in the protected areas of speech and association. See U.S. v. Robel, 389 U.S. 258, 268 (1967). See also NAACP v. Button, 371 U.S. 415, (1963).

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Clearly, what the Commission deems to be determinative of affiliation between committees is control of one by the other. Since there is no clear and concise recitation of facts which establishes that the delegate committees to which COMPAC contributed were controlled by the Mondale Campaign, then the complaint has failed to describe a violation over which the Commission has jurisdiction. The facts alleged in the complaint do no more than speculate as to some degree of cooperation and consultation between the national campaign and the delegate committees. Whether or not these allegations are true, they do not state a violation of the Act. The freedom to associate and the freedom to share ideas on campaign literature are protected by the First Amendment. The Supreme Court has recognized the potential "chilling effect" on political committees by a broad reading of the Commission's guidelines, NAACP v. Alabama, 357 U.S. 449 (1958), and accordingly gave a narrow construction to the definition of "political committees" in Buckley v. Valeo, 424 U.S. 1 (1976). Recently, the D.C. Circuit recognized the need to give more protection to First Amendment rights of those engaged in political organizing and held that presidential candidate "draft" groups in question who had merely a "common aim" in "some day [producing] a candidate acceptable to them" did not become subject to the Act's proscriptions. F.E.C. v. Machinists Non-Partisan Political League, 655 F.2d 380, 392 (D.C. Cir. 1981), cert. denied, 454 U.S. 897 (1981).

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Machinists Non-Partisan Political League is particularly relevant here. There is no more showing in the complaint that COMPAC is affiliated with Mondale operations or other cited labor organizations than there was in the Commission's proceeding there under review that 1980 "draft" Kennedy operations in several states were affiliated with each other and/or Senator Kennedy. Judge Wald's reasoning should apply here. COMPAC should be dismissed as a Respondent in these proceedings.

Moreover, the nature of political campaigns is such that communication among various volunteers and sympathizers cannot be and should not be controlled by the campaign and/or the delegate committees.7/ Based on a random assortment of unverified news accounts (Complainants' Attachments A-1 through A-17) the complaint alleges that the Mondale staff "instructed" unnamed committees on how to organize and operate. Such consultation is not evidence of control, and is not included in the Commission's own indicia of affiliation. The Complaint further alleges that unnamed Mondale staffers were transferred to unnamed delegate committees. (Complaint, p. 5.) This overly broad allegation fails to cite any "concise or clear" facts showing that the delegate committees to which COMPAC contributed were controlled by

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7/ Primary contests have their "own form of strangeness" which actually thwarts communication between various elements of mythically highly organized and mechanized national campaigns and local volunteer efforts, like congressional district-level delegate committees, because of the rapid pace and complexity of events. Elizabeth Drew, Portrait of an Election, p.175 (1981).

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former Mondale staffers. Aside from the insufficient specificity of the latter allegation, if true, it would show only minimal (possibly social) contacts between campaign organizations and operatives (involving the exercise of protected associational rights) at the basic precinct level -- hardly "control." Moreover, it would seem that after the Mondale Campaign Committee itself left Pennsylvania for the next primary state, the most qualified and likely candidates to fill vacant staff positions for the delegate committees would be former Mondale Campaign workers. This is completely inadequate evidence of control.

The only allegation which approximates a recitation of facts describing control by Mondale of the delegate committees is that the delegate committees stopped accepting PAC contributions after Mondale urged them to stop. This allegation, like the others, was based on attached "news" accounts. Yet those news stories carried as much, if not more, information tending to show that Mondale had no control over the delegate committees: Various delegate committees accepted and continued to accept PAC money despite candidate Mondale's requests that they not do so. (See "Mondale Directs Disputed Groups to End Operation," New York Times, April 26, 1984; "The More Mondale Flails, The Deeper He Gets Into PAC Mess," Washington Post, April 26, 1984; "How PAC-Man Pulled It Off," Richmond Times Dispatch, April 28, 1984; and "Mr. Mondale UnPACs," New York Times, April 29, 1984.) (Attachments A-9, A-11, A-16, and A-17, respectively) Additionally, some delegate committees have refused to shut down despite

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Mondale's requests for them to do so. ("Mondale Agrees to Return Disputed Funds," Washington Post, April 28, 1984.) (Attachment A-14) The Complainants' own exhibits thus contradict and counter these allegations that Mondale controls the delegate committees.

It would be irresponsible, if not absurd, for the Commission to instigate a formal proceeding based upon such unsupported newspaper accounts including opinion columns and editorials (See Attachments A-11, A-12, A-16 and A-17) in addition to putative "news" stories. It should be noted there is no mention whatsoever of COMPAC in any such story, opinion piece or editorial.

Finally, there are no facts demonstrating any connection between Mondale and the delegate committees to which COMPAC contributed. The complaint alleges that Mondale's control of the delegate committees is confirmed by the reports of private investigators appended to the complaint as Attachments B through K. Yet those reports do not contain one scintilla of evidence showing any control by Mondale over the committees. In fact, these affidavits betray the rank speculation and quicksand upon which Complaints' case is made.[8/] How the presence of Mondale Campaign literature in delegate committee offices demonstrates

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8/ See, for example, Complaint Attachment F: "She appeared to be a Mondale staffer as opposed to a volunteer, especially in the way that she associated with Mike Hachman, described in "b" below and the man described in "c" below, whom I also believe to be Mondale staff people." (p. 2) (Emphasis supplied). Idle gossip and conjecture alone cannot fuel formal proceedings by this Commission.

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affiliation is never explained by Complainants, who apparently advocate an especially harsh rule, which would prohibit the exchange of ideas between committees which share a political goal.

The private investigators' reports "supporting" the complaint amount to no more than speculation and conjecture about a hoped for connection between Mondale and the delegate committees. The Complainants claim that paid Mondale staff were coordinating operations at the Philadelphia Mondale At-Large Delegate Committee offices. This bold pronouncement is based on nothing more than the fact that certain persons wore gold Mondale pins and that they visited Mondale's traveling headquarters in a different hotel. In fact, the Complainants, despite their distasteful spying and eavesdropping, are unable to factually document a single instance where a Mondale staffer controlled a delegate committee. Moreover, they have totally failed to demonstrate such a connection involving any delegate committee to which COMPAC contributed.9/

Read as a whole the affidavits of various private investigators employed by Complainants represent only pathetic

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9/ The 22nd Cong. Dist. Delegates for Mondale in Cobden, Illinois, a committee to which COMPAC contributed $5,000, allegedly paid two individuals salary and reimbursed gasoline expense by transmitting them through Mondale's campaign headquarters in Washington. In addition, that committee used an "Illinois for Mondale" envelope allegedly addressed by the same person who allegedly addressed two other delegate committee envelopes. These are hardly indicia of control, showing at most a small degree of cooperation and perhaps a peripatetic volunteer.

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detective fiction and inept political espionage. More importantly, no affidavit pertains to any delegate committee to which COMPAC contributed.

Because the complaint fails to recite any facts describing clearly and concisely that the delegate committees to which COMPAC contributed were controlled, financed, established, or maintained by COMPAC or anyone else, the complaint fails to describe a violation of the Act and the allegation that COMPAC contributed over $5,000 to Mondale should be dismissed.

COMPAC hereby expressly reserves any rights that it may have under the Act or otherwise against the Commission or Complainants.

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CONCLUSION

In summary, Complainants have failed to clearly and concisely describe a violation of the Act or the Commission's regulations with respect to COMPAC's contributions to any delegate committees. On the one hand, they allege wrongdoing where the acts complained of are constitutionally protected association and communication. Where they allege acts, which, if committed, would be violations, they have relied on conjecture, speculation and inuendo rather than facts.

The Complainants have gone on a "fishing expedition" and have found no evidence of wrongdoing on the part of COMPAC. In fact, it appears that the Complainants have named COMPAC as a respondent as part of a scheme of harassment and intimidation,

designed to discredit various components of the American labor movement, in the false hope that something incriminating or embarassing might develop.

The Commission's procedures are not meant to be used as part of a "witch hunt" for wrongdoers. The Commission is not the investigative arm of Complainant National Right to Work Committee. It can investigate only if it has "reason to believe that a violation of a statute or regulation. . . has occurred or is about to occur." 2 U.S.C. §437g(a)(2). A "reason" is the circumstances, proofs, facts or motives generating a conviction, and is not merely a whim or curiosity. Hunt v. Personnel Commission, 115 N.H. 713, 715, 349 A.2d 605, 607 (1975). Based on the complaint, there is no "reason" for further investigation of COMPAC.10/

The Commission's business is not to scan the horizon for possible violations by Complainants' political foes. Only if Complainants present the Commission with a "clear and concise recitation of the facts which describe a violation of the statute" accompanied by "documentation supporting the facts alleged" should the Commission proceed with an investigation. As a consequence of the Complainants' failure to meet their burden,

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10/ The "deferential attitude" judicially applied upon the review of action by authorities regulating corporate, commercial or labor activities does not extend to this Commission, whose creation raises "weighty Constitutional objections." Thus, where the Federal Trade Commission and the Securities and Exchange Commission "are vested with broad duties to gather and compile information and to conduct periodic investigations concerning business practices..., the FEC has no such roving functions." F.E.C. v. Machinists Non Partisan Political League, 655 F.2d at 387.

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this complaint should be dismissed in its entirety as to Respondent United Mine Workers of America Coal Miners Political Action Committee.

Respectfully submitted,

Earl R Pfeffer

One of the Attorneys for United Mine Workers of America Coal Miners Political Action Committee

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APPENDIX I

DISTRICT OF COLUMBIA: SS.

VERIFICATION

JOHN J. BANOVIC, Treasurer of United Mine Workers of America Coal Miners Political Action Committee ("COMPAC"), having been duly sworn, on oath hereby states that he has read the foregoing Memorandum Pursuant to 11 C.F.R. §111.6(a) Setting Forth Reasons Why The Commission Should Take No Action On and Dismiss The Complaint Against COMPAC, and that all factual matters set forth therein are true and correct.

Dated: June 18, 1984

John J. Banovic

John J. Banovic

SUBSCRIBED AND SWORN to
before me this 18th day
of June, 1984.

Carolyn G. Green
Notary Public

mce: 1/31/89

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NAME	RESIDENCE	CONTRIBUTION TO	DATE/ AMOUNT NPC	NH	AMOUNTS OVER $1000
Roger Altman	NY, NY	NH 1st	2/18/83 $1000	2/22/84 $1000	$1000
Julianne Angelides	Sacramento, CA	NH 1st	2/14/83 $500	2/17/84 $1000	$500
Martin Barell	NY,NY	NH 1st		2/21/84 $1000	
Jay Beck	Chevy Chase, MD	NH 2d		2/21/84 $$2500	$1500
Martin Binder	Wheeling, IL	NH 1st	10/17/83 $1000 11/03/83 $10	2/22/84 $1000	$1010
Richard C. Blum	San Francisco, CA	NH 1st	2/4/83 $1000	2/13/84 $1000	$1000
Richard Brenner	NY, NY	NH 1st	5/2/83 $1000 5/12/83 $10 4/8/83 $10	2/24/84 $1000	$1020
Virginia Conger	Miami, FL	NH 2d	4/25/83 $1000	2/21/84 $1000	$1000
Virginia Conger	Miami, FL	NH 1st		2/17/84 $1000	
Clive Cummis	West Orange, NJ	NH 2d	1/4/83 $1000 1/21/83 $25	2/27/84 $1000	$1025
S. Harrison Dogole	Philadelphia, PA	NH 2d	1/4/83 $1000 3/2/83 $15 3/[illegible]/83 $10	2/22/84 $1000	$1025
Jeanne S. Friedman	NY, NJ	NH 1st	1/26/83 $10 2/7/83 $25 2/9/83 $1000	2/13/84 $500	$535

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NAME	RESIDENCE	CONTRIBUTION TO	DATES/AMOUNTS MPC	MH	AMOUNTS OVER $1000
Patricia Garrett	Tiburon, CA	NH 2d	1/19/83 $20 1/24/83 $750 2/9/83 $10	2/21/84 $1000	$780
Gerald Gutterman	NY, NY	NH 2d		2/27/84 $5000	$4000
Elliott Hondlor	Los Angeles, CA	NH 1st		2/21/84 $1000	
Harvard M. Jee	Rollings Hills, CA	NH 1st	5/11/83 $1000 5/26/83 $5	2/21/84 $1000	$1005
Nancy Kuhn	NY, NY	NH 1st	2/10/83 $1000 3/22/83 $25	2/22/84 $1000	$1025
Barbara S. Landow	Bethesda, MD	NH 2d		2/16/84 $1000	
Mr. Landow	Bethesda, MD	NH 2d	1/4/83 $1000 1/20/83 $5	2/16/84 $1000	$1005
Richard C. Leone	Princeton, NJ	NH 2d	1/4/83 $1000 1/21/83 $25 3/17/83 $15	2/27/84 $500	$540
Howard J. Levitz	Ardsley, NY	NH 2d	1/26/83 $50 3/17/83 $1000	2/23/84 $5000	$5050
Leonard Liberman	Secaucus, NJ	NH 2d	3/7/83 $25 3/31/83 $1000	2/27/84 $200	$225

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NAME	RESIDENCE	CONTRIBUTION TO	DATE/ AMOUNT NPC	NH	AMOUNTS OVER $1000
Lewis Manilow	Chicago, IL	NH 1st	6/1/83 $1000 6/9/83 $10 6/21/83 $1 6/29/83 $1 7/18/83 $1 7/25/83 $1	2/22/84 $1000	$1014
Anita Manshel	NY, NY	NH 1st	1/24/83 $1000 3/7/83 $25	2/13/83 $1000	$1025
Warren Manshel	NY, NY	NH 1st	1/21/83 $25 1/24/83 $1000 3/17/83 $15	2/13/83 $1000	$1040
Abraham, Margolis	Ny, NY	NH 2d		2/16/84 $1000	
Gertrude Margolis	NY, NY	NH 2d		2/16/84 $1000	
David Marks	?	NH 1st		2/22/84 $650	
William Marovite	?	NH 1st		2/22/84 $500	
Stuart G. Moldow	Atherton, CA	NH 1st		2/13/84 $1000	
Harold Morgan	San Francisco, CA	NH 1st	1/31/84 $1000 2/8/84 $25	2/13/84 $1000	$1025
Anne Nickoloff	Hibbing, MN	NH 1st		2/17/84 $1000	

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NAME	RESIDENCE	CONTRIBUTION TO	DATES/ AMOUNTS NPC	NH	AMOUNTS OVER $1000
Robert Nickoloff	Hibbing, MN	NH 1st		2/17/84 $1000	
Daniel Ritey	Los Angeles, CA	NH 1st	2/7/84 $1000 2/14/84 $2	2/21/84 $500	$502
Howard T. Rosen	Milburn, NJ	NH 2d	1/4/83 $1000 1/19/83 $20 2/7/83 $1 2/8/83 $1 3/1/83 $1	2/27/84 $250	$271
Sidney H. Rosen	Boca Raton, FL	NH 2d	12/19/83 $25 12/20/83 $25 12/30/83 $10	2/22/84 $20	
Thomas B. Rosenberg	Chicago, IL	NH 1st	1/4/83 $250 1/26/83 $2	2/22/84 $1000	$252
Judith Rubin	NY, NY	NH 1st	1/21/83 $20 3/25/83 $1000	2/17/84 $5000	$5020
Alan Sagner	NY, NY	NH 2d		2/27/84 $1000	
A.R. Sanchez, Jr.	Loredo, TX	NH 2d	4/15/83 $15 5/3/83 $1000	2/22/84 $1000	$1015

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ATTACHMENT 15 (Page 4 of 6)

NAME	RESIDENCE	CONTRIBUTION TO	DATE/ AMOUNT NRC	NH	AMOUNTS OVER $1000
Mrs. A.R. Sanchez, Jr.	Loredo, TX	NH 2d	4/12/83 $5 5/3/83 $1000	2/22/84 $1000	$1005
Irwin Selinger	Old Westburg, NY	NH 1st	1/21/83 $1000 1/24/83 $3	2/2284 $2000	$2003
Clarice Smith	Bethesda, MD	NH 2d	1/3/83 $1000 1/28/83 $10 3/4/83 $20	2/16/84 $1000	$1030
Robert H. Smith	Bethesda, MD	NH 2d	1/3/83 $1000 2/14/83 $25	2/16/84 $1000	$1025
Matt Spagat	Highland, IL	NH 1st	6/30/83 $1000 7/28/83 $20	2/22/84 $500	$520
Melvin Swig	San Francisco, CA	NH 1st	1/21/83 $20 1/26/83 $250	2/13/84 $1000	$270
Minot Weld Tripp, Jr.	San Francisco, CA	NH 1st	2/23/83 $1,000 1/24/83 $100 1/21/83 $25	2/13/84 $1000	$1125
Lawrence A. Turk	NY, NY	NH 2d	1/20/83 $10 1/28/83 $5 3/17/83 $1000	2/27/84 $5000	$5015

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ATTACHMENT 1 (Page 5 of 6)

NAME	RESIDENCE	CONTRIBUTION TO	DATE/ AMOUNT NPC	NH	AMOUNTS OVER $1000
Mark Ross Weinberg	Los Angeles, CA	NH 1st		2/22/84 $2000	$1000
Bernard Weissbourd	Evanston, IL	NH 1st		2/22/84 $1000	
A.N. Zepapas	Daytona Beach, FL	NH 2d		2/16/84 $1000	

8504050380 1

AGGREGATE TOTALS OF LABOR PAC CONTRIBUTIONS TO THE MONDALE DELEGATE COMMITTEES

Organization	Aggregate Total
1) ACTWU PAC	$10,550.00
2) AFL-CIO COPE PCC	18,163.64
3) AFSCME Employees Organized to Promote Legislative Equality	72,580.00
4) AFT COPE	54,100.00
5) CWA Committee on Political Contribution Committees	31,000.00
6) Ironworkers PAC	8,150.00
7) Bricklayers PAC	10,500.00
8) MNPL	14,500.00 */
9) SEIU COPE PCC	20,000.00
10) UAW V-CAP	55,932.76
11) Carpenters Legislative Improvement Committee	11,000.00
12) UFCW Active Ballot Club	22,000.00
13) UMWA Coal Miners PAC	30,000.00
	$348,476.40

8504050380 2

*/ $5,000 of this amount was reported as going to the Philadelphia Democratic Executive Committee for "maximizing delegate selection efforts on behalf of Walter Mondale." That committee is located across the street from the Pennsylvania At-Large Delegate Committee.

Re: MURs 1667 and 1704

Dear :

You were previously notified of the Federal Election Commission's receipt of the complaints in MURs 1667 and/or 1704 alleging possible violations of the Federal Election Campaign Act, as amended. This is to advise you that on , 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

8504053803

ATTACHMENT 17 (Page 1 of 1)

EPSTEIN BECKER BORSODY & GREEN, P.C.
ATTORNEYS AT LAW
1140 19TH STREET, N. W.
WASHINGTON, D.C. 20036
(202) 861-0900

250 PARK AVENUE
NEW YORK, NEW YORK 10177
(212) 370-9800

HALLICK TOWER
ONE SUMMIT AVENUE
FORT WORTH, TEXAS 76102*
(817) 334-0701

235 MONTGOMERY STREET
SAN FRANCISCO, CALIFORNIA 94104*
(415) 398-3500

1875 CENTURY PARK EAST
LOS ANGELES, CALIFORNIA 90067*
(213) 556-8861

JEFFREY H. BECKER
ROBERT P. BORSODY
WILLIAM A. BARNELL*
STEVEN H. BARSEY**
STEVEN B. EPSTEIN
STUART H. GERSON
GILBERT J. GINSBURG
RONALD H. GREEN
WILLIAM A. HELVESTINE*
GREGORY S. HESTAND*
ROBERT L. JAUVTIS*
WILLIAM S. KOPIT
DAVID C. MAIN, JR.
FRANK C. HORNE, JR.
JAMES P. MULREEN*
WILLIAM C. OLDAKER
JOSEPH P. PARKER**
SUSAN SCHENKEL-SAVITT*
FRANKLIN G. SEARS**
HARRY N. TURK*
KENNETH S. WECKSTEIN

DANIEL S. ABRAHAMS
BRIAN A. BANNON
AMY J. BEECH*
PHILIP M. BERKOWITZ*
CAROL S. BERNHEIM*
STEPHEN S. BOOCHEVER
PAMELA S. BOUEY*
PAUL BROWNSTEIN*
DALE E. CALLENDER*

VICTORIA E. DUGANON*
ROBERT A. DOLINAS*
KAREN BONNIE EATON
THOMAS N. FARAH
LAWRENCE W. FUTTERMAN*
PHILIP M. GASSEL*
PETER S. GRAY
DOUGLAS A. HASTINGS
LINDA S. HERSHA*
LESLIE J. HERMAN
WAYNE A. KELP
SANDRA R. KING
BETTYE S. KITCH**
LAWRENCE W. KOLTUN
DENNIS A. LALLI*
DAVID H. LARRY
STEPHEN R. MILLS*
ROBERT J. MOSES
JOY D. OBERMAN*
MA A. PLOTSKY*
RICHARD J. REINSTEIN*
ROBERT D. REIF
ARTHUR R. ROSE
LYNN E. SHAPIRO
RICHARD L. STEER*
PETER N. STEIN
LINDA V. TIANO*
CARRIE VALIANT
JEFFREY H. VILLET
PATRICK WESTERKAMP*
KATHLEEN M. WILLIAMS
MICHAEL L. ZIEGLER*

EDWIN H. EPSTEIN
KENNETH HARPENIST*
ARNOLD R. LEVY*
MALCOLM MASON***
STUART ORSHER, M.D.*
DONALD PARTLAND*
FREDERICA E. SMITHLINE*
J. ROBERT STEELMAN
SIDNEY TOORES*

*D.C. NEW YORK AND WASHINGTON, D.C. ONLY

* NOT ADMITTED WASHINGTON
** ADMITTED TEXAS ONLY
*** ADMITTED IN ENGLAND AND WALES ALSO

GCC #3744

June 22, 1984

8504030800

Stephen Mims, Esquire
Office of the General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 1704

Dear Mr. Mims:

Enclosed please find response of the American Federation of Teachers Committee on Political Education to the above-entitled matter.

Should the Commission decide to proceed further, Respondent respectfully requests that this matter be handled through voluntary informal conciliation at this stage in the Commission's proceedings.

Sincerely,

William C. Oldaker

WCO/LJK:ses
Enclosure

ATTACHMENT 1E (Page 1 of 1)

EPSTEIN BECKER BORSODY & GREEN, P.C.
ATTORNEYS AT LAW
1140 19TH STREET, N.W.
WASHINGTON, D.C. 20036
(202) 861-0900

250 PARK AVENUE
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FRANK C. MORRIS, JR.
JAMES P. MULAEEN*
WILLIAM C. OLDAKER
JOSEPH P. PARKER**
SUSAN SCHENKEL-SMITT*
FRANKLIN R. SEARS**
HARRY N. TURK*
KENNETH S. WECASTEIN

DANIEL B. ABRAHAMS
BRIAN A. BANNON
AMY J. BEECH*
PHILIP M. BERKOWITZ*
CAROL S. BERNHEIM*
STEPHEN S. BOOCHEVER
PAMELA S. BOUEY*
PAUL BRONSTEIN*
DALE E. CALLENDER*

VICTORIA E. GIBBON*
ROBERT A. DOLINAS*
KAREN BONNIE EATON
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EDWIN N. EPSTEIN
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DONALD PARTLAND*
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J. ROBERT STEELMAN
SIDNEY TOORES*

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** ADMITTED TEXAS ONLY
*** ADMITTED IN ENGLAND AND WALES ALSO

GCC #3745

June 22, 1984

8504030380

Stephen Mims, Esquire
Office of the General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 1704

Dear Mr. ~~Mims~~ STEVE:

Enclosed please find response of the Machinists Non-Partisan Political League to the above-entitled matter.

Should the Commission decide to proceed further, Respondent respectfully requests that this matter be handled through voluntary informal conciliation at this stage in the Commission's proceedings.

Sincerely,

William C. Oldaker

WCO/LJK:ses
Enclosure

85 :1 22

ATTACHMENT 19 (Page 1 of 1)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

David M. Ifshin, Esquire
Carolyn U. Oliphant, Esquire
Mondale for President Committee, Inc.
2201 Wisconsin Avenue, N.W.
Suite 100
Washington, D.C. 20007

Re: MUR 1704
Mondale for President Committee, Inc.
Michael S. Berman, as treasurer

Dear Mr. Ifshin and Ms. Oliphant:

The Federal Election Commission previously notified your clients of the complaints in MURs 1667 and 1704 alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended, ("the Act"). On , 1984, the Commission voted to merge MUR 1667 with 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 and information supplied by you, the Commission determined there is reason to believe that your clients, Mondale for President Committee, Inc. and Michael S. Berman, as treasurer, violated 2 U.S.C. § 441a(f), a provision of the Act by accepting excessive contributions. This finding was premised on the Commission's conclusion that the Mondale delegate committees are affiliated with the Mondale for President Committee, Inc.

Also on , 1984, the Commission reconsidered its position of May 8, 1984, not to enter into pre-probable cause conciliation negotiations, and decided to approve your clients' request of April 30, 1984, and enter into conciliation negotiations at this time. Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If your clients agree with the provisions of the enclosed agreement, please sign and return it to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible. If

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ATTACHMENT 20 (Page 1 of 5)

you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Robert Bonham, the attorney assigned to this matter, at (202) 523-4000.

Sincerely,

Enclosures

8504050380 7

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

William C. Oldaker, Esquire
Epstein, Becker, Borsody, and Green, P.C.
1140 - 19th Street, N.W.
Washington, D.C. 20036

Re: MUR 1704
American Federation of Teachers
Committee on Political Education
("AFT COPE")
Robert G. Porter, as treasurer

Dear Mr. Oldaker:

The Federal Election Commission previously notified your clients of a complaint in MUR 1704 alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to your clients at that time. We acknowledge receipt of your explanation of this matter which was dated June 22, 1984.

On , 1984, upon further review of the allegations contained in the complaint in MUR 1704 and information supplied by you, the Commission determined that there is reason to believe the AFT COPE and Robert G. Porter, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A), a provision of the Act. Specifically, it appears the AFT COPE made contributions to the Mondale campaign which, in the aggregate, were excessive. In addition, the Commission voted to merge MUR 1704 with MUR 1667, a matter that involves similar allegations, but does not specifically name your clients as respondents. All future correspondence regarding these matters will refer to them as MUR 1704.

Also on , 1984, the Commission approved your clients' June 22, 1984, request to enter into pre-probable cause conciliation negotiations. Enclosed is a conciliation agreement

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ATTACHMENT 21 (page 1 of 4)

that the Commission has approved in settlement of this matter. If your clients agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible. If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Stephen Mims, the attorney assigned to this matter at (202)523-4143.

Sincerely,

Enclosure
Conciliation Agreement

8504050380 7

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

William C. Oldaker, Esquire
Epstein, Becker, Borsody, and Green, P.C.
1140 - 19th Street, N.W.
Washington, D.C. 20036

Re: MUR 1704
Machinists Non-Partisan
Political League
Eugene Glover, as treasurer

Dear Mr. Oldaker:

The Federal Election Commission previously notified your clients of a complaint in MUR 1704 alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to your clients at that time. We acknowledge receipt of your explanation of this matter which was dated June 22, 1984.

On , 1984, upon further review of the allegations contained in the complaint in MUR 1704 and information supplied by you, the Commission determined that there is reason to believe that the Machinists Non-Partisan Political League and Eugene Glover, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A), a provision of the Act. Specifically, it appears that the Machinists Non-Partisan Political League made contributions to the Mondale campaign which, in the aggregate, were excessive. In addition, the Commission voted to merge MUR 1704 with MUR 1667, a matter that involves similar allegations, but does not specifically name your clients as respondents. All future correspondence regarding these matters will refer to them as MUR 1704.

Also on , 1984, the Commission approved your clients' June 22, 1984, request to enter into pre-probable cause conciliation negotiations. Enclosed is a conciliation agreement

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ATTACHMENT 22 (Page 1 of 4)

that the Commission has approved in settlement of this matter. If your clients agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible. If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Stephen Mims, the attorney assigned to this matter at (202)523-4143.

Sincerely,

Enclosure
Conciliation Agreement

8504050381

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Arthur M. Goldberg, Esquire
ACTWU
15 Union Square West
New York, New York 10003

Re: MUR 1704
Amalgamated Clothing and Textile Workers Union PAC (ACTWU PAC), John Fox, Treasurer

Dear Mr. Goldberg:

The Federal Election Commission previously notified your clients of a complaint in MUR 1704 alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to your clients at that time. We acknowledge receipt of your explanation of this matter which was dated June 19, 1984.

On , 1984, upon further review of the allegations contained in the complaint in MUR 1704 and information supplied by you, the Commission determined that there is reason to believe that the ACTWU PAC and John Fox, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A), a provision of the Act. Specifically, it appears that the ACTWU PAC made contributions to the Mondale campaign which, in the aggregate were excessive. In addition, the Commission voted to merge MUR 1667 with MUR 1704, a matter that involves similar allegations, but does not specifically name your clients as respondents. All future correspondence regarding these matters will refer to them as MUR 1704.

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. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit all such materials within ten days of your receipt of this letter. All statements should be submitted under oath.

ATTACHMENT 23 (Page 1 of 2)

8504038[illegible]

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, the attorney assigned to this matter, at (202) 523-4143.

Sincerely,

Enclosures
Procedures

8504050381 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Margaret E. McCormick, Esquire
Lawrence Gold, Esquire
AFL-CIO Legal Department
815 16th Street, N.W. Room 808
Washington, D.C. 20006

Re: MUR 1704
AFL-CIO COPE PCC, Thomas R. Donahue, Treasurer

Dear Ms. McCormick and Mr. Gold:

The Federal Election Commission previously notified your clients of a complaint in MUR 1704 alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to your clients at that time. We acknowledge receipt of your explanation of this matter which was dated June 21, 1984.

On , 1984, upon further review of the allegations contained in the complaint in MUR 1704 and information supplied by you, the Commission determined that there is reason to believe that the AFL-CIO COPE PCC and Thomas R. Donahue, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A), a provision of the Act. Specifically, it appears that the AFL-CIO COPE PCC made contributions to the Mondale campaign which, in the aggregate were excessive. In addition, the Commission voted to merge MUR 1667 with MUR 1704, a matter that involves similar allegations, but does not specifically name your clients as respondents. All future correspondence regarding these matters will refer to them as MUR 1704.

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. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit all such materials within ten days of your receipt of this letter. All statements should be submitted under oath.

ATTACHMENT 24 (Page 1 of 2)

8504038117

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, the attorney assigned to this matter, at (202) 523-4143.

Sincerely,

Enclosures
Procedures

8504050381 5

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Larry P. Weinberg, Esquire
Kirschner, Weinberg, Dempsey et, al.
1100 17th Street, N.W.
Suite 800
Washington, D.C. 20036

Re: MUR 1704
AFSCME Public Employees Organized to
Promote Legislative Equality-QUALIFIED
(PEOPLE), William Lucy, Treasurer

8504030815

Dear Mr. Weinberg:

The Federal Election Commission previously notified your clients of a complaint in MUR 1704 alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to your clients at that time. We acknowledge receipt of your explanation of this matter which was dated June 19, 1984.

On , 1984, upon further review of the allegations contained in the complaint in MUR 1704 and information supplied by you, the Commission determined that there is reason to believe that the AFSCME PEOPLE and William Lucy, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A), a provision of the Act. Specifically, it appears that the AFSCME PEOPLE made contributions to the Mondale campaign which, in the aggregate were excessive. In addition, the Commission voted to merge MUR 1667 with MUR 1704, a matter that involves similar allegations, but does not specifically name your clients as respondents. All future correspondence regarding these matters will refer to them as MUR 1704.

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. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit all such materials within ten days of your receipt of this letter. All statements should be submitted under oath.

ATTACHMENT 25 (Page 1 of 2)

This matter will remain confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) unless you notify the Commission in writing that your clients wish the matter to be made public. If you have any questions, please contact Stephen Mims, the attorney assigned to this matter, at (202) 523-4143.

Sincerely,

Enclosures
Procedures

8504030817

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

James B. Coppess, Esquire
CWA
1925 K Street, N.W., Suite 411
Washington, D.C. 20006

Re: MUR 1704
Communication Workers of America (CWA)
COPE PCC, Louis B. Knecht, Treasurer

Dear Mr. Coppess:

The Federal Election Commission previously notified your clients of a complaint in MUR 1704 alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to your clients at that time. We acknowledge receipt of your explanation of this matter which was dated June 18, 1984.

On , 1984, upon further review of the allegations contained in the complaint in MUR 1704 and information supplied by you, the Commission determined that there is reason to believe that the CWA COPE PCC and Louis B. Knecht, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A), a provision of the Act. Specifically, it appears that the CWA COPE PCC made contributions to the Mondale campaign which, in the aggregate were excessive. In addition, the Commission voted to merge MUR 1667 with MUR 1704, a matter that involves similar allegations, but does not specifically name your clients as respondents. All future correspondence regarding these matters will refer to them as MUR 1704.

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. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit all such materials within ten days of your receipt of this letter. All statements should be submitted under oath.

ATTACHMENT 29 (Page 1 of 2)

8504053818

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, the attorney assigned to this matter, at (202) 523-4143.

Sincerely,

Enclosures
Procedures

8504050381 2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Sarah Fox, Esquire
Bricklayers and Allied Craftsmen
815 - 15th Street, N.W.
Washington, D.C. 20005

Re: MUR 1704
Bricklayers and Allied Craftsmen
Political Action Committee (BAC),
Edward M. Bellucci, Treasurer

Dear Ms. Fox:

The Federal Election Commission previously notified your clients of a complaint in MUR 1704 alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to your clients at that time. We acknowledge receipt of your explanation of this matter which was dated June 20, 1984.

On , 1984, upon further review of the allegations contained in the complaint in MUR 1704 and information supplied by you, the Commission determined that there is reason to believe that the BAC and Edward M. Bellucci, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A), a provision of the Act. Specifically, it appears that the BAC made contributions to the Mondale campaign which, in the aggregate were excessive. In addition, the Commission voted to merge MUR 1667 with MUR 1704, a matter that involves similar allegations, but does not specifically name your clients as respondents. All future correspondence regarding these matters will refer to them as MUR 1704.

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. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit all such materials within ten days of your receipt of this letter. All statements should be submitted under oath.

8504053820

ATTACHMENT 2A (Page 1 of 2)

This matter will remain confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) unless you notify the Commission in writing that your clients wish the matter to be made public. If you have any questions, please contact Stephen Mims, the attorney assigned to this matter, at (202) 523-4143.

Sincerely,

Enclosures
Procedures

8504050382 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Lester Asher, Esquire
Asher, Pavalon, Gittler, et, al.
Two North LaSalle Street
Chicago, Illinois 60602

Re: MUR 1704
Service Employes International Union
(SEIU) COPE PCC, Richard W. Cordtz,
Treasurer

Dear Mr. Asher:

The Federal Election Commission previously notified your clients of a complaint in MUR 1704 alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to your clients at that time. We acknowledge receipt of your explanation of this matter which was dated June 18, 1984.

On , 1984, upon further review of the allegations contained in the complaint in MUR 1704 and information supplied by you, the Commission determined that there is reason to believe that the SEIU COPE PCC and Richard W. Cordtz, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A), a provision of the Act. Specifically, it appears that the SEIU COPE PCC made contributions to the Mondale campaign which, in the aggregate were excessive. In addition, the Commission voted to merge MUR 1667 with MUR 1704, a matter that involves similar allegations, but does not specifically name your clients as respondents. All future correspondence regarding these matters will refer to them as MUR 1704.

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. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit all such materials within ten days of your receipt of this letter. All statements should be submitted under oath.

ATTACHMENT 2B (Page 1 of 2)

This matter will remain confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) unless you notify the Commission in writing that your clients wish the matter to be made public. If you have any questions, please contact Stephen Mims, the attorney assigned to this matter, at (202) 523-4143.

Sincerely,

Enclosures
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ATTACHMENT 2A (Page 2 of 2)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Alan V. Reuther, Esquire
UAW
1757 N Street, N.W.
Washington, D.C. 20036

Re: MUR 1704
United Auto Workers (UAW) V-CAP,
Donald J. Moll, Treasurer

Dear Mr. Reuther:

The Federal Election Commission previously notified your clients of a complaint in MUR 1704 alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to your clients at that time. We acknowledge receipt of your explanation of this matter which was dated June 18, 1984.

On , 1984, upon further review of the allegations contained in the complaint in MUR 1704 and information supplied by you, the Commission determined that there is reason to believe that the UAW V-CAP and Donald J. Moll, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A), a provision of the Act. Specifically, it appears that the UAW V-CAP made contributions to the Mondale campaign which, in the aggregate were excessive. In addition, the Commission voted to merge MUR 1667 with MUR 1704, a matter that involves similar allegations, but does not specifically name your clients as respondents. All future correspondence regarding these matters will refer to them as MUR 1704.

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. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit all such materials within ten days of your receipt of this letter. All statements should be submitted under oath.

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ATTACHMENT 29 (Page 1 of 2)

This matter will remain confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) unless you notify the Commission in writing that your clients wish the matter to be made public. If you have any questions, please contact Stephen Mims, the attorney assigned to this matter, at (202) 523-4143.

Sincerely,

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ATTACHMENT 29 (Page 2 of 2)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Kathy L. Krieger, Esquire
Carpenters Legislative Improvement Committee
101 Constitution Avenue, N.W.
Washington, D.C. 20001

Re: MUR 1704
Carpenters Legislative Improvement Committee (CLIC), Patrick J. Campbell, Treasurer

8504050382 6

Dear Ms. Krieger:

The Federal Election Commission previously notified your clients of a complaint in MUR 1704 alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to your clients at that time. We acknowledge receipt of your explanation of this matter which was dated June 15, 1984.

On , 1984, upon further review of the allegations contained in the complaint in MUR 1704 and information supplied by you, the Commission determined that there is reason to believe that the CLIC and Patrick J. Campbell, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A), a provision of the Act. Specifically, it appears that the CLIC made contributions to the Mondale campaign which, in the aggregate were excessive. In addition, the Commission voted to merge MUR 1667 with MUR 1704, a matter that involves similar allegations, but does not specifically name your clients as respondents. All future correspondence regarding these matters will refer to them as MUR 1704.

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. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit all such materials within ten days of your receipt of this letter. All statements should be submitted under oath.

ATTACHMENT 30 (Page 1 of 2)

This matter will remain confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) unless you notify the Commission in writing that your clients wish the matter to be made public. If you have any questions, please contact Stephen Mims, the attorney assigned to this matter, at (202) 523-4143.

Sincerely,

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ATTACHMENT 2C (Page 2 of 2)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Edward P. Wendel, Esquire
Assistant General Counsel
United Food and Commercial Workers Union
1775 K Street, N.W., Suite 900
Washington, D.C. 20006

Re: MUR 1704
United Food and Commercial Workers (UFCW) Active Ballot Club, Anthony J. Lutty, Treasurer

8504103823

Dear Mr. Wendel:

The Federal Election Commission previously notified your clients of a complaint in MUR 1704 alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to your clients at that time. We acknowledge receipt of your explanation of this matter which was dated June 12, 1984.

On , 1984, upon further review of the allegations contained in the complaint in MUR 1704 and information supplied by you, the Commission determined that there is reason to believe that the UFCW Active Ballot Club and Anthony J. Lutty, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A), a provision of the Act. Specifically, it appears that the United Food and Commercial Workers (UFCW) Active Ballot Club made contributions to the Mondale campaign which, in the aggregate were excessive. In addition, the Commission voted to merge MUR 1667 with MUR 1704, a matter that involves similar allegations, but does not specifically name your clients as respondents. All future correspondence regarding these matters will refer to them as MUR 1704.

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. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit all such materials within ten days of your receipt of this letter. All statements should be submitted under oath.

ATTACHMENT 31 (Page 1 of 2)

This matter will remain confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) unless you notify the Commission in writing that your clients wish the matter to be made public. If you have any questions, please contact Stephen Mims, the attorney assigned to this matter, at (202) 523-4143.

Sincerely,

Enclosures
Procedures

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Michael H. Holland, Esquire
UMA
900 15th Street, N.W.
Washington, D.C. 20005

Re: MUR 1704
United Mine Workers of America Coal Miners' PAC (UMWCOM PAC), John J. Banovic, Treasurer

Dear Mr. Holland:

The Federal Election Commission previously notified your clients of a complaint in MUR 1704 alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to your clients at that time. We acknowledge receipt of your explanation of this matter which was dated June 18, 1984.

On , 1984, upon further review of the allegations contained in the complaint in MUR 1704 and information supplied by you, the Commission determined that there is reason to believe that the UMWCOM PAC and John J. Banovic, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A), a provision of the Act. Specifically, it appears that the UMWCOM PAC made contributions to the Mondale campaign which, in the aggregate were excessive. In addition, the Commission voted to merge MUR 1667 with MUR 1704, a matter that involves similar allegations, but does not specifically name your clients as respondents. All future correspondence regarding these matters will refer to them as MUR 1704.

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. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit all such materials within ten days of your receipt of this letter. All statements should be submitted under oath.

ATTACHMENT 32 (Page 1 of 2)

This matter will remain confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) unless you notify the Commission in writing that your clients wish the matter to be made public. If you have any questions, please contact Stephen Mims, the attorney assigned to this matter, at (202) 523-4143.

Sincerely,

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ATTACHMENT #2 (Page 2 of 2)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Victor J. VanBourg, Esquire
VanBourg, Allen, Weinberg and
Roger, P.C.
875 Battery Street
San Francisco, California 94111

Re: MUR 1704
Ironworkers Political Action
League
John T. Traylor, as treasurer

Dear Mr. Van Bourg:

The Federal Election Commission previously notified your clients of a complaint in MUR 1704 alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to your clients at that time. We acknowledge receipt of your explanation of this matter which was dated June 13, 1984.

On , 1984, upon further review of the allegations contained in the complaint in MUR 1704 and information supplied by you, the Commission determined that there is reason to believe that the Ironworkers Political Action League and John T. Traylor, as treasurer, violated 2 U.S.C. §§ 434(b)(6)(B)(i) and 441a(a)(2)(A), provisions of the Act. Specifically, it appears that the Ironworkers Political Action League failed to report a $1,000 disbursement to the Pennsylvania 21st Congressional Delegates for Mondale Committee and made excessive contributions, in the aggregate, to the Mondale Campaign. In addition, the Commission voted to merge MUR 1704 with MUR 1667, a matter that involves similar allegations, but does not specifically name your clients as respondents. All future correspondence regarding these matters will refer to them as MUR 1704.

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

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ATTACHMENT 33 (Page 1 of 2)

Office of the General Counsel must proceed to the next compliance stage as noted on page 2, paragraph 2 of the enclosed procedures. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit all such materials within ten days of your receipt of this letter. All 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 your clients wish the matter to be made public. If you have any questions, please contact Stephen Mims, the attorney assigned to this matter, at (202)523-4143.

Sincerely,

Enclosures
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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

James M. Beck, Esquire
Pepper, Hamilton and Scheetz
20th Floor
The Fidelity Building
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 , 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 , 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.

8504053831

ATTACHMENT 31 (Page 1 of 2)

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, the attorney assigned to this matter, at (202)523-4143.

Sincerely,

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Debbie O'Dell Seneca, Treasurer
22nd Congressional District Delegate
Committee for Mondale (PA)
335 North Main Street
Washington, Pennsylvania 15301

Re: MUR 1704
22nd Congressional District
Delegate Committee for
Mondale (PA)
Debbie O'Dell Seneca, as treasurer

Dear Ms. Seneca:

The Federal Election Commission previously notified you 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 you at that time. We acknowledge receipt of your explanation of this matter which was dated June 6, 1984.

On , 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 and information supplied by you, the Commission also on , 1984, determined that there is reason to believe that the 22nd Congressional District Delegate Committee for Mondale (PA) and you, as treasurer, violated 2 U.S.C. § 434(b)(3)(B), a provision of the Act. Specifically, it appears that the Pennsylvania 22nd Congressional District Delegates for Mondale Committee and you, as treasurer, failed to provide required contributor information for two contributions totaling $7,000. 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.

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ATTACHMENT 35 (Page 1 of 2)

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, 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 you wish the matter to be made public. If you have any questions, please contact Stephen Mims, the attorney assigned to this matter, at (202)523-4143.

Sincerely,

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Salvatore Mancini, Treasurer
1st District Delegate Committee
for Mondale (RI)
1910 Smith Street, Suite 9
N. Providence, Rhode Island 02911

Re: MUR 1704
1st District Delegate Committee
for Mondale (RI)
Salvatore Mancini, as treasurer

Dear Mr. Mancini:

The Federal Election Commission previously notified you 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 you at that time.

On , 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 , 1984, determined that there is reason to believe that the 1st District Delegate Committee for Mondale (RI) and you, as treasurer, violated 2 U.S.C. § 434(c), a provision of the Act. Specifically, it appears that the 1st District Delegate Committee for Mondale (RI) failed to amend its Statement of Organization to indicate its affiliation with the 2nd District Delegates for Mondale (RI). 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.

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ATTACHMENT 3a (Page 1 of 2)

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 you, 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 you wish the matter to be made public. If you have any questions, please contact Stephen Mims, the attorney assigned to this matter, at (202)523-4143.

Sincerely,

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Joseph DeLorenzo, Treasurer
2nd District Delegate Committee for Mondale
1910 Smith Street, Suite 9
N. Providence, Rhode Island 02911

Re: MUR 1704
2nd District Delegate Committee
for Mondale
Joseph DeLorenzo, as treasurer

Dear Mr. DeLorenzo:

The Federal Election Commission previously notified you 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 you at that time.

On , 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 , 1984, determined that there is reason to believe that the 2nd District Delegate Committee for Mondale and you, as treasurer, violated 2 U.S.C. § 434(c), a provision of the Act. Specifically, it appears that the 2nd District Delegate Committee for Mondale (RI) and you, as treasurer, failed to amend its Statement of Organization to indicate its affiliation with the 1st District Committee for Mondale (RI). 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.

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ATTACHMENT 37 (Page 1 of 2)

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 you, 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 you wish the matter to be made public. If you have any questions, please contact Stephen Mims, the attorney assigned to this matter, at (202)523-4143.

Sincerely,

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INDIVIDUAL CONTRIBUTIONS TO DELEGATE COMMITTEES[1/]

States Represented	Number of Contributors to Delegate Committees	Number of Contributors to Delegate Committees Who Also Contributed to Mondale for President Committee	% of Total Contributors to Delegate Committees	Number of Contributors to Delegate Committee from Out-of-State
Arizona	57	15	26.3%	1
California	19	2	10.5%	0
Colorado	6	5	83.3%	0
Dist. of Col.	8	5	62.5%	1
Florida	76	23	30.3%	1
Illinois	239	24	10.1%	4
Maryland	32	12	37.5%	1
New Hampshire	51	31	60.8%	51[2/]
New York	44	9	20.5%	1
North Carolina	3	1	33.3%	0
Ohio	34	10	29.4%	0
Pennsylvania	28	8	28.6%	0
Rhode Island	3	2	66.6%	0
Texas[3]	18	3	16.6%	0
Virginia	1	0	-0-	0
TOTALS	619	150	24.2%	60

1/ Material taken from "Selected List of Receipts and Expenditures (Special Mondale G) Section I - Individual Contributions," 5/22/84 and 6/28/84.

2/ New Hampshire had no in-state contributors on the basis of this report regarding delegate committee contributions. The New Hampshire contributors were from: California 11; Florida 4; Illinois 6; Maryland 4; Minnesota 2; New Jersey 5; New York 14; Pennsylvania 1; Texas 2.

New Hampshire represents a comparatively unique situation regarding contribution amounts and when the contributions were made to the delegate committees. Forty-two contributors out of a total of 51 contributed $1,000 or more to a New Hampshire Delegate Committee. Thirty-one contributors had also contributed $1,000 or more to the Mondale for President Committee. Thirty-seven of the 51 exceeded the limitations when adding contributions to MPC and the delegate committees. The amount in excess of the limitation for the 37 is $47,402 (according to the submission for matching funds made by MPC through May 1984 and delegate committee reports). This would seem to indicate that the Mondale for President Committee either directly or indirectly solicited contributions by giving a list to the New Hampshire delegate committees of "generous" contributors.

According to the report, 28 of 51 contributions went to the New Hampshire 1st District Delegates for Mondale. The remaining contributions (23) went to the New Hampshire 2nd District Delegates for Mondale. The 1st District committee received contributions from February 13 through February 22. The 2nd District committee received contributions from February 16 through February 27.

3/ Eighty-five percent of the contributions to Texas delegate committees in this report were related to the phone industry (7 contributions from workers employed with AT&T, 3 from workers employed with Southwestern Bell, 1 from a member (employee?) of the Communication Workers of America, and 2 unrelated; 11 of 13 = 85%).

ATTACHMENT 35 (Page 1 of 1)

DISBURSEMENTS TO INDIVIDUALS BY DELEGATE COMMITTEES 1/

Delegate Committee Name 2/	Disbursements to Out-of-State Workers (% of Total)		Total Number of Disbursements	Amount of Out-of-State Workers (% of Total)		Total Amount Expended by Committee
MAINE						
7th Congressional District Delegates for Mondale	4	(36%)	11	$ 1,850	(42%)	$2,693
19th Congressional District Delegates for Mondale	2	(100%)	2	$ 425	(100%)	$ 425
20th Congressional District Delegates for Mondale	1	(100%)	1	$ 750	(100%)	$ 750
22nd Congressional District Delegates for Mondale	3	(37.5%)	8	$ 610	(26%)	$2,316
NEW HAMPSHIRE						
N.H. 2nd District Delegates for Mondale	106	(100%)	106	$16,938	(100%)	$16,938
NORTH CAROLINA						
Guilford for Delegates for Mondale	1	(25%)	4	$ 15	(10.4%)	$ 144
PENNSYLVANIA						
Delegates At-Large for Mondale	9	(69%)	13	$ 1,534	(59%)	$2,581
Mondale Delegates Committee	5	(100%)	5	$ 1,150	(100%)	$1,150
4th District Delegates for Mondale	5	(6.5%)	77	$ 1,872	(37.5%)	$4,998
Mondale Delegate Committee 12th Congressional District	9	(90%)	10	$ 1,640	(84.5%)	$1,940
Mondale 13th Delegate Committee	23	(92%)	25	$ 2,135	(85.2%)	$2,507
Pa. 14th Cong. District Delegates for Mondale	2	(100%)	2	$ 311	(100%)	$ 311
Mondale Delegates - 20th District	1	(50%)	2	$ 300	(50%)	$ 600
22nd Cong. Dist. Delegates Committee for Mondale	6	(85%)	7	$ 640	(77%)	$ 827
VIRGINIA						
Mondale 3rd District Delegate Selection Comm.	4	(57.1%)	7	$ 857	(55.1%)	$1,555
WISCONSIN						
5th Cong. Dist. Mondale Delegate Committee	11	(100%)	11	$ 2,862	(100%)	$2,862
Wisconsin At-Large Delegate Mondale Committee	15	(94%)	16	$ 3,178	(93%)	$3,416
TOTALS 3/	207	(87.4%)	307	$36,287	(79.2)	$45,813

1/ Material taken from "Selected List of Receipts and Expenditures (Special Mondale G) Section IV - Disbursements to Individuals/Vendors," 5/22/84 and 6/28/84.

2/ This list represents only those delegate committees that made disbursements to out-of-state residents.

3/ The disbursements by the delegate committees to individuals with out-of-state residences and listing payment as per diem wages suggests these individuals were "gypsies." For instance, a telephone directory check in New Hampshire of individuals with out-of-state residences was made to see if they were college students. This check found no individual listed on the report residing in any of the college towns or major cities.

There seem to be instances of overlap when an out-of-state worker appears on the disbursement lists of 2 or more delegate committees in different states. The resident address of the worker often changes to Washington, DC when shown on the disbursement report of the second delegate committee.

There appear to be also in-state workers who have worked for two or more delegate committees within a state.

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DISBURSEMENTS TO VENDORS

VENDOR ANALYSES BY CONGRESSIONAL DISTRICTS[1/]

1)	Broadside Press (vendor in Ill.)		
	15th District Delegates for Mondale (Illinois)	)	districts
	19th District Delegates for Mondale Committee (Illinois)	)	adjoin
2)	CFR Leasing (vendor in Penn.)		
	Delegates At-Large for Mondale (Penn.)	)	districts
	7th Congressional District Mondale Delegates (Penn.)	)	adjoin
3)	Clam Box (vendor in Fla.)		
	Mondale 16th District Delegate Committee (Fla.)	)	districts
	Mondale 15th District Delegate Committee (Fla.)	)	adjoin
4)	Congressional Systems Inc. (vendor in Texas)		
	Mondale 16th District Delegate Committee (Fla.)	)	districts adjoin one
	Mondale 15th District Delegate Committee (Fla.)	)	another but vendor in
		)	another State
5)	Cook County Badge & Buttons (vendor in Ill.)		
	Third Congressional District Delegates for Mondale (Ill.)	)	districts
	16th Delegates for Mondale (Ill.)	)	adjoin
6)	Creative Printing (vendor in Penn.)		
	Mondale Delegates Committee (Penn.)	)	districts
	22nd Congressional District Delegate Committee for Mondale (Penn.)	)	adjoin
7)	District Council 37, AFSCME (vendor in NY)		
	Mondale 17th Congressional District Delegate Comm.	)	districts
	6th Congressional District Delegates for Mondale	)	adjoin
	10th Congressional District Delegates for Mondale	)	
8)	Kennedy Printing Company (vendor in Penn.)		
	Delegates At-Large for Mondale	)	districts
	7th Congressional District Mondale Delegate Comm.	)	adjoin
9)	Lloyds Printing Service (vendor in Fla.)		
	Mondale 15th District Delegate Committee	)	adjoin in
	14th Congressional District for Mondale	)	Miami area
	Congressional District #1 Delegates for Mondale	)	in panhandle NW
	Congressional District #4 Delegates for Mondale	)	in NE corner
10)	Lloyds Letter Service (vendor in Fla.)		
	Mondale 16th District Delegate Committee	)	separated by
	Congressional District #10 Delegates for Mondale	)	CD #12
11)	Progress Printing (vendor in Ill.)		
	Second Congressional District Delegates for Mondale	)	Chicago
	16th Delegates for Mondale	)	North Ill.
	Fourth District Mondale Delegate Committee	)	Chicago
	10th District Mondale Delegate Committee	)	Chicago

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13th Congressional District Delegate Committee for Walter F. Mondale	)	Chicago
Eleventh District Mondale Delegate Committee	)	Chicago
12th District Mondale Delegate Committee	)	Chicago
Ninth District Mondale Delegate Committee	)	Chicago
Sixth District Mondale Delegate Committee	)	Chicago
1st Congressional District Delegates for Walter Mondale	)	Chicago
17th District Mondale Delegate Committee	)	North Ill.
22nd Congressional District Delegates for Mondale	)	not adjoining in southern part of state
7th Congressional District Delegates for Mondale	)	Chicago area
14th District Delegate Committee for Mondale	)	North Ill.

12) Sharons Printing Place (vendor in Fla.)

14th Congressional District Delegates for Mondale	)	SE Fla.
Northern 12th Congressional District Delegates for Mondale	)	SE Fla.
Congressional District #7 Delegates for Mondale	)	Tampa area
Mondale Delegates, Congressional District #13	)	Sarasota area
Congressional District #4 Delegates for Mondale	)	NE Fla.

13) The Ink Spot (vendor in Fla.)

Congressional District #9 Delegates for Mondale	)	districts
Congressional District #7 Delegates for Mondale	)	adjoin

1/ In the "Selected List of Receipts & Expenditures (Disbursements to Individuals)" submitted by Mondale Delegate Committees, there appear to be 13 instances where different delegate committees have used the same vendors. In eight of these instances, the delegate committees as defined by congressional districts adjoin one another. It is conceivable in these instances that the two delegate committees' headquarters were close enough to a particular vendor to be utilized by both.

In the remaining five instances, the delegate committees' congressional boundaries do not adjoin one another. They are separated by one or more congressional districts. In one instance, by several states. The Florida Delegate Committees committed four of five alleged violations.

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WHITE PLAINS, NY 10604
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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.

ATTACHMENT 41 (Page 1 of 12)

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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".

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.

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).

ATTACHMENT 4 (Page 5 of 12)

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,

ATTACHMENT 41 (Page 4 of 12)

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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.

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

ATTACHMENT 4 (Page 9 of 12)

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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

ATTACHMENT 4 (Page 11 of 12)

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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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Pepper, Hamilton & Scheetz
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Attorneys for JOANNE CIULLA, TREASURER, PENNSYLVANIA DELEGATES AT-LARGE FOR MONDALE

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RECEIVED THE FEC
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May 29, 1984

Stephen Mims
General Counsel's Office
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

84 JUN -2 A3:14

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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ATTACHMENT 42 (Page 1 of 7)

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

ATTACHMENT 42 (Page 2 of 7)

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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

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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.F.R. §100.5(g)(2)(ii).

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ATTACHMENT 42 (Page 5 of 7)

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

ATTACHMENT 42 (Page 6 of 7)

8504030863

Federal Election Campaign Act.

Respectfully submitted,

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Attorneys for LAWRENCE P. MURIN, TREASURER, MONDALE DELEGATES COMMITTEE.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 14, 1984

David M. Ifshin, Esq.
Carolyn U. Oliphant, Esq.
Mondale for President Committee, Inc.
2201 Wisconsin Avenue, N.W.
Washington, D.C. 20007

Re: MURs and 1704

Dear Mr. Ifshin and Ms. Oliphant:

This responds to your motion to dismiss the complaints in MURs and 1704 or, in the alternative, to dismiss certain evidence from the Commission's consideration of those MURs.

On August 7, 1984, the Commission considered your motion and has determined, under the circumstances presented, to deny your motion. Accordingly, your motion to dismiss the complaints and certain evidence in MURs and 1704 is denied.

If you have any questions, please contact Lois Lerner at 523-4143.

Sincerely,

Charles N. Steele
General Counsel

8504053865

FEDERAL ELECTION COMMISSION
WASHINGTON D C 20463

MEMORANDUM TO: CHARLES N. STEELE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/JODY C. RANSOM JCR

DATE: AUGUST 10, 1984

SUBJECT: MURs and 1704 -
Memorandum to the Commission
dated August 9, 1984

The above-named document was circulated to the Commission on a 24 hour no-objection basis at 11:00, August 9, 1984.

There were no objections to the revised notification letter at the time of the deadline.

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FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

84 AUG 9 A8:41

August 9, 1984

SENSITIVE

MEMORANDUM TO: The Commission

FROM: Charles N. Steele
General Counsel

SUBJECT: Revised Letter to Counsel for Mondale for President Committee, Inc., Regarding MPC's Motion to Dismiss the Complaints in MURs and 1704

On August 7, 1984, the Commission denied the Mondale For President Committee, Inc.'s ("MPC"), motion to dismiss the complaints in MURs and 1704 or, alternatively, to strike the evidence in those complaints obtained by private investigators. In addition, the Commission amended the proposed notification letter to counsel for MPC which had been attached to the Office of the General Counsel's July 27, 1984, memorandum to the Commission regarding these matters. Finally, the Commission approved the notification letter as amended.

Attached for the Commission's review, is a copy of the notification letter as revised by the General Counsel's Office to reflect the Commission's amendments.

Attachment

Revised Notification Letter (1 pg.)

8504053857

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

David M. Ifshin, Esq.
Carolyn U. Oliphant, Esq.
Mondale for President Committee, Inc.
2201 Wisconsin Avenue, N.W.
Washington, D.C. 20007

Re: MURs and 1704

Dear Mr. Ifshin and Ms. Oliphant:

This responds to your motion to dismiss the complaints in MURs and 1704 or, in the alternative, to strike certain evidence from the Commission's consideration of those MURs.

On August 7, 1984, the Commission considered your motion and has determined, under the circumstances presented, to deny your motions. Accordingly, your motion to strike the complaints and certain evidence in MURs and 1704 is denied.

If you have any questions, please contact Lois Lerner at 523-4143.

Sincerely,

Charles N. Steele
General Counsel

8504033863

ATTACHMENT 1
(Page 1 of 1)

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Mondale for President) MURs 1704
Committee, Inc.)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of August 7, 1984, do hereby certify that the Commission took the following actions in the above-captioned matter:

1. Decided by a vote of 6-0 to amend the draft letter attached to the General Counsel's July 27, 1984, report by deleting the following language from lines two and three of the second paragraph:

> determined that, under the circumstances presented, it does not have the authority to grant your motion.

and substituting in lieu thereof the following language:

> has determined that, under the circumstances presented, to deny your motion.

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

(Continued)

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2. Decided by a vote of 6-0 to substitute the word, dismiss, for the word, strike, in paragraphs one and two of the draft letter attached to the General Counsel's report dated July 27, 1984.

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

3. Decided by a vote of 6-0 that with respect to the paragraph in lines 16-21 on page four of the General Counsel's report dated July 27, 1984, that the Commission does not take any position at this time with respect to the advisability of making a statement concerning the NRWC's conduct, as it does not wish to pre-judge this matter.

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

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

a) Deny MPC's motion to strike the complaints in MURs and 1704.

b) Deny MPC's motion to strike the evidence obtained by private investigators in MURs and 1704.

c) Approve the letter attached to the General Counsel's report dated July 27, 1984, as amended in the meeting.

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

Attest:

8-8-84
Date

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

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FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

84 AUG 3 P2:51

August 3, 1984

Submitted Late

SENSITIVE

EXECUTIVE SESSION
AUG 7 1984

MEMORANDUM

TO : The Commission

FROM : Charles N. Steele
General Counsel

SUBJECT: Request for Commission Consideration of Memorandum to the Commission from Charles N. Steele regarding respondent Mondale For President Committee, Inc.'s, Motion to Strike the complaint in MURs and 1704

The Office of the General Counsel requests Commission consideration of the above-described report at its closed session of August 7, 1984. Late submission of this document is necessitated by the short period of time between the Commission's last consideration of this matter and the deadline for submitting documents for the next Executive Session.

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FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

August 3, 1984

MEMORANDUM TO: The Commission

FROM: Charles N. Steele
General Counsel

SUBJECT: Respondent Mondale For President Committee, Inc.'s Motion to Strike the Complaints in MURs and 1704

On June 28, 1984, the Office of the General Counsel received a motion filed by the Mondale For President Committee, Inc. ("MPC"), to strike the complaints in MURs and 1704 or, in the alternative, to strike certain evidence contained in the complaints. Subsequently, on July 27, 1984, this Office forwarded to the Commission a memorandum discussing the issues raised by MPC's motion and recommending that the Commission deny the motion. That memorandum was placed on the agenda for the Commission Executive Session of July 31, 1984. Thereafter, on July 30, 1984, the Office of the General Counsel received a supplement to MPC's original motion which contained additional information on the allegedly unscrupulous and unlawful activities engaged in by the complainants in these three MURs. In addition, that supplement contained additional legal arguments in support of MPC's contention that the complaints be dismissed by the Commission.

At the July 31, 1984, Executive Session, the Commission requested that the Office of the General Counsel submit a written analysis discussing the precedents cited by MPC in its supplemental submission for the proposition that "the National Labor Relations Board on occasion has applied the 'unclean hands' doctrine in administrative actions similar to FEC proceedings." MPC Supplemental Submission ("Supp. Sub.") at 10 and 11 (footnote omitted). Accordingly, the General Counsel's Office has prepared the following discussion. This Office concludes that nothing in the precedents cited by MPC requires the Commission to dismiss the complaints in these three matters. Instead, those precedents provide persuasive authority for not dismissing the complaints. Thus, the General Counsel's Office stands by the recommendations contained in the July 27, 1984, memorandum that the Commission deny MPC's motion.

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Discussion

The doctrine of "unclean hands" is an equitable concept invoked by courts to deny relief to a litigant "tainted with inequitableness or bad faith relative to the matter in which he seeks relief . . .." "Precision Instrument Manufacturing Co. v. Automotive Maintenance Machinery Co., 324 U.S. 806, (1945). The doctrine is rooted in the historical concept of courts as a vehicle for affirmatively enforcing the requirements of conscience and good faith. Id. Although traditionally applied only in equitable proceedings, a number of decisions have stated that the doctrine expresses a general principle equally applicable to actions purely at law. See e.g., Ranchers Exploration and Development Co. v. Anaconda Co., 248 F.Supp. 708, 728 (D. Utah 1965). Furthermore, those principles may also apply in the context of administrative proceedings. As noted by MPC, the Supreme Court has recognized that the NLRB has the power to consider a complainant's misconduct and to refuse to proceed on a complaint which constitutes an abuse of the agency's process. NLRB v. Indiana & Michigan Electric Co., 318 U.S. 9, 16-19 (1943) ("I&M")(dicta). See Supp. Sub. at 11 1/

In its supplemental submission, MPC argues that NRWC, as the complainant in these MURs, is in a position analogous to that of a private plaintiff in a civil lawsuit seeking injunctive relief. As such, MPC contends that, "for reasons similar to those underlying the 'unclean hands' doctrine, NRWC's complaints should be dismissed." Supp. Sub. at 6. In support of this proposition, MPC cites four NLRB decisions as examples of instances where the Board "has applied the unclean hands doctrine to administrative

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1/ MPC characterizes this decision as "uphold[ing] the NLRB's authority to dismiss complaints because of a complainant's misconduct." Supp. Sub. at 11. Contrary to MPC's suggestion, the NLRB did not dismiss the administrative complaint in that case. Instead, the labor board denied the respondent's petition to consider evidence of the complainant's misconduct, concluding that "the matters recited therein have no relation to the issues in this proceeding." I&M, 318 U.S. at 13. In dicta, however, the Supreme Court's decision states that the Board has wide discretion with respect to the processing of complaints, emphasizing that it is not required by statute to "move on every charge . . .." I&M, 318 U.S. at 18. [The Board's authorizing legislation states that the Board "shall have the power" to take various steps whenever it receives a complaint alleging a violation, but, unlike FECA, does not direct that the agency actually take those steps. See 29 U.S.C. § 160(b).] The Court concluded, therefore, that the Board could properly consider allegations of misconduct as material to its own decision to entertain and proceed upon a complaint. I&M, 318 U.S. at 18.

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actions similar to FEC proceedings." Supp. Sub. at 10. The most recent of those decisions, Bartenders Union Local 355, AFL-CIO, 245 NLRB 774 (1979) ("Bartenders Local 355") 2/, summarizes the Board's position with respect to the affirmative defense of "unclean hands." Rather than supporting MPC's contention that the Commission should dismiss the complaints in these three MURs, however, the Bartenders Local 355 decision provides support for the denial of MPC's motion.

In Bartenders Local 355, the administrative law judge, whose opinion subsequently was affirmed by the Board, refused to consider allegations that the complainant had engaged in numerous flagrant unfair labor practices. After emphasizing that the allegation of unclean hands does not automatically estop the Board from vindicating and protecting the public rights inherent in the Act which may have been infringed, 3/ the ALJ declined to invoke the doctrine on the facts of that case, citing an NLRB policy to apply the "[un]clean hands" doctrine against a complainant to deny or limit relief only where the relief sought is "directly related" to the alleged misconduct by the complainant. Thus, "the doctrine of '[un]clean hands' is not applicable against the Charging Party." Id., at 776. 4/ Instead of dismissing the administrative complaint, the ALJ in Bartenders

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2/ This decision was incorrectly cited by MPC as "Doral Beach Hotel." The hotel was another respondent.

3/ See also I&M, 318 U.S. at 17-18 ("We cannot agree with the view of the Circuit Court of Appeals that the evidence [of misconduct by the complainant] might disqualify [the complainant] from making the charge of violation against the Company or deprive the charge of force and effect, and thereby defeat the Board's jurisdiction to hear the case. * * * [W]e hold that the misconduct of the [complainant] union would not deprive the Board of jurisdiction").

4/ The apparent rationale for this rule is suggested in a decision cited in Bartenders Local 355, where the Board stated

> [t]he "[un]clean hands" doctrine of equity does not operate against a charging party since proceedings such as this are not for the vindiction of private rights but are brought in the public interest and to effectuate the statutory policy. NLRB v. Plumbers Union of Nassau County, Local 457 etc., 299 F.2d 497 (C.A. 2); NLRB v. Springfield Building and Construction Trades Council, 262 F.2d 494 (C.A. 1).

International Brotherhood of Teamsters, Local 294, 145 NLRB 484, 492 n. 9 (1963). See also, Milk Drivers & Dairy Employees, Local 546, 133 NLRB 1314, 1322 (1961) (also cited in Bartenders Local 355).

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Local 355 indicated that the appropriate remedy for misconduct by the charging party would be the filing of a separate complaint against the initial complainant:

> A charge may be filed by any person . . . . The Board's processes have been, and continue to be, available to Respondent for the remedy of any past misconduct.

Bartenders Local 355, 245 NLRB at 776 (footnote omitted). 5/

The three other NLRB decisions cited by MPC, while not as harmful to MPC's cause as Bartenders Local 355, also do not support dismissal of the complaints here. Both of the NLRB decisions cited by MPC as examples of situations where the Board invoked the doctrine of unclean hands "to dismiss actions that abuse its administrative processes to further the illegal or unethical ends of the complaining parties," Supp. Sub. at 10-11, involved misconduct by the complainant that was directly related to the complainants' improper motives for the filing of their complaints with the Board. In Vaughn Bowen, 93 NLRB 1147 (1951), the Board dismissed the complaint with respect to certain respondents after concluding that it had not been filed to secure a remedy for violations of federal statute by those respondents. Instead, the Board concluded that the allegations in the complaint against those respondents were made for the sole purpose of furthering the cause of the union representing complainants in a jurisdictional dispute with another union.

5/ See also, Plumbers Union Local 457, 131 NLRB 1243, 1246 (1961) (footnotes omitted) (also cited in Bartenders Local 355):

> [t]he present case is no different from any other case in which the respondent as a defense to its own unfair labor practices asserts that the charging party has also been guilty of unfair labor practices, or even that its own unlawful conduct was undertaken with a view to forcing correction of unfair labor practices by the charging party. One unfair labor practice does not excuse another. If a respondent believes that a charging party is guilty of unfair labor practices, the proper procedure is for the respondent to file unfair labor practice charges against the charging party . . . .

(Emphasis added.)

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Similarly, Fernades Supermarkets, Inc., 203 NLRB 548 (1973), involved a complainant who repeatedly filed and withdrew repetitious changes both with and without merit, and then participated in a union election only to subsequently refile substantially identical charges after it lost the election. In addition, the final NLRB precedent cited by MPC, like Bartenders Local 355 itself, did not involve the dismissal of a complaint at all. In Laura Modes Co., 144 NLRB 1592 (1963), the Board merely modified the remedy which it imposed. Thus, these decisions are both consistent with the formulation set forth in Bartenders Local 355 and distinguishable from the instant situation.

Conclusion

Based on the foregoing analysis of the NLRB decisions cited by MPC, the Office of the General Counsel believes it would be inappropriate for the Commission to dismiss the complaints in three matters. Initially, except to the extent that NRWC's alleged misconduct occurred while it was preparing to submit its complaints to the Commission, the relief NRWC sought in the complaints is unrelated to NRWC's alleged misconduct. Furthermore, although other motives may have been involved, in the filing of the complaint, it is clear that one of NRWC's purposes was to correct apparent violations of the Act. Similarly, there are no allegations of bad faith. Cf. Vaughn Bowen, and Fernandes Supermarkets, Inc., supra. Finally, like the respondent in Bartenders Local 355, MPC can file an administrative complaint with the Commission against NRWC. Accordingly, the General Counsel's Office recommends that the Commission deny MPC's motion in its entirety.

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RECOMMENDATIONS

1. Deny MPC's motion to strike the complaints in MURs and 1704.

2. Deny MPC's motion to strike the evidence obtained by private investigators in MURs and 1704.

3. Approve the proposed letter attached to the Office of General Counsel's July 27, 1984 memorandum to the Commission in MURs and 1704.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MURs and 1704
Mondale for President Committee, Inc.)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of July 31, 1984, do hereby certify that the Commission decided by a vote of 5-0 to defer consideration of the motion to strike the complaints in MURs and 1704 in order that the Commission might receive the General Counsel's comments on the July 30, 1984 submission from the Mondale for President Committee in this matter.

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

Attest:

8-2-84
Date

Marjorie W. Emmons
Secretary of the Commission

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FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

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COMMISSION SECRETARY

Submitted Late

July 27, 1984

SENSITIVE

EXECUTIVE SESSION

MEMORANDUM TO: The Commission

FROM: Charles N. Steele
General Counsel

JUL 31 1984

SUBJECT: Respondent Mondale for President Committee, Inc.'s Motion to Strike the Complaints in MURs 1704

On June 28, 1984, the Office of the General Counsel received a motion to strike the complaints or, in the alternative, strike certain evidence contained in the complaints in MURs and 1704. The motion, filed by the Mondale for President Committee, Inc. ("MPC") is based on MPC's charge that the complaints "are the product of unlawful conduct which should not be sanctioned by the Commission." Specifically, MPC alleges that the complainants in these MURs, the National Right To Work Committee and Ralph Martin Hettinga (jointly referred to as "NRWC") spent over $75,000 to hire "private investigators" to infiltrate the Mondale delegate committees and engage in activities that constituted "dirty tricks", spying on MPC delegate committee operations and theft. MPC urges the Commission to strike the complaints or, in the alternative, refuse to consider the factual materials supplied by NRWC which are a product of its efforts. MPC also asks the Commission to publicly state that it does not condone such activities.

The following is a discussion of the issues raised by MPC's motion:

I. Whether the Commission Should Dismiss the Three Complaints.

Section 437g(a) of the Act specifically empowers any person to bring possible violations of the Act to the Commission's attention. In the event that the complaint complies with the formalities set forth in 11 C.F.R. § 111.4, the Commission is required to notify the respondents of the complaint and, after it providing the respondents with an opportunity to respond to the charges, make a determination whether there is reason to believe the respondents violated the Act. There are no statutory or regulatory limitations upon the origin of the materials or other factual data provided by the complainant.

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In the event that the facts surrounding the filing of a complaint indicate that the complainant has violated the Act or any other federal statute, the Commission may deal with those violations in the appropriate manner by internally generating a MUR or referring the matter to the proper government agency. 1/ Nothing, however, in the Act or the regulations gives the Commission the authority to dismiss an otherwise proper complaint because the complainant had "unclean hands" when it brought the matter to the Commission's attention.

II. Whether the Commission Should Strike NRWC's Evidence.

MPC urges the Commission to strike the evidence gathered by NRWC in the event that the motion to strike the complaints is not granted. MPC argues that the Commission's failure to do so "could constitute tacit approval or even encouragement which could amount to state action", thus evoking the Fourth Amendment protections against unreasonable search and seizure. Under the Fourth Amendment exclusionary rule, the fruits of an unreasonable search and seizure by the government or a private party acting as an agent of the government may be inadmissible as evidence in a governmental proceeding.

MPC's argument fails for several reasons. First, the exclusionary rule may not apply to administrative actions such as the Commission's enforcement proceedings. In United States v. Janis, 424 U.S.C. 433 (1976), the Supreme Court stated that administrative agencies "are not restricted to rigid rules of evidence", and allowed the Internal Revenue Service to use evidence in an agency proceeding, which had previously been excluded from a criminal case. See also NLRB v. South Bay Daily Breeze, 415 F.2d 360 (9th Cir. 1969), cert. denied, 397 U.S. 915 (1970) (wherein the court refused to extend the exclusionary rule to Labor Board proceedings.)

Second, it is questionable whether an illegal "search and seizure" even occurred. The information contained in the affidavits provided by NRWC appears to have been available to any member of the general public who entered the delegate committee headquarters. 2/ Where evidence is in plain view and where the party obtaining the evidence is lawfully on the premises, the

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1/ Similarly, where the complainant may have violated a respondent's personal rights, the respondent may have a private right of action, under the appropriate laws, against the complainant.

2/ Although MPC alleges that theft occurred neither the affidavits of the investigators nor MPC's motion provide evidence of theft.

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Fourth Amendment protections do not come into play. See e.g., Harris v. United States, 390 U.S. 234 (1968); Coolidge v. New Hampshire, 403 U.S. 443, rehearing denied, 404 U.S. 874 (1971); United States v. Various Gambling Devices, 478 F2d 1194 (5th Cir. 1973).

Finally, even assuming that the exclusionary rule can be applied to Commission proceedings and that an illegal search occurred, the rule does not apply in this circumstance because the Commission took no part in the searches involved. Where a private party conducts a search on its own which, if conducted by the government, would violate the Fourth Amendment, the government is not prohibited from using the evidence obtained by the private party. See, e.g., Burdeau v. McDowell, 256 U.S. 465 (1921); United States v. Jackson, __ U.S.__, 104 S. Ct. 1652 (1983); United States v. Janis, 428 U.S. 433 (1976). In addition, the mere fact that the government knew of the private party's conduct is not enough to evoke the Fourth Amendment protections. "The government must be involved either directly as a participant or indirectly as an encourager of the private citizen's actions before [the court will] deem the citizen to be an instrument of the state...." United States v. Walther, 652 F.2d 788, 791 (9th Cir. 1981) Here, the Commission neither participated in, nor encouraged the activities involved in this matter. Consequently, we conclude that the exclusionary rule does not apply here.

Under the views expressed in the foregoing opinions, the Commission is not, under these circumstances, obligated to strike the complaint or the evidence supplied by NRWC.

III. Whether the Commission Has the Authority To Direct NRWC to Cease Such Activities

MPC claims that the activities engaged in by NRWC's investigators violate the spirit, if not the letter of the Act because the investigators falsely represented themselves in order to infiltrate MPC and obtain information. Thus, according to MPC, it is the Commission's responsibility to direct NRWC to cease such activities. As MPC correctly points out, the FECA was enacted to promote a fair and open political system. In order to accomplish that goal, Congress limited or prohibited certain activities and provided a method whereby private parties who are aware of apparent violations of those limitations and prohibitions can bring them to the Commission's attention via the filing of a complaint.

The only section of the Act that gives the Commission authority to stop a person's activity where it appears that the person may be acting under false pretenses is 2 U.S.C. § 441h.

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That section provides in part that:

> no person who is a candidate for Federal office or an employee or agent of such candidate shall fraudulently misrepresent himself or any committee or organization under his control as speaking or writing or otherwise acting for or on behalf of any other candidate or political party or employee or agent thereof on a matter which is damaging to such other candidate, or political party or employee or agent thereof.

(emphasis added) By its clear language, Section 441h applies only to activity undertaken by candidates or their employees or agents and does not apply to the activities of other parties attempting to gather information upon which to base a complaint.

Although the Commission is without authority to stop NRWC's activities, absent a violation of the Act 3/, it should not be seen as condoning NRWC's tactics. This office suggests that the Commission may want to consider making a statement indicating it does not condone NRWC's conduct to become part of the public record once this matter is closed.

RECOMMENDATIONS

1) Deny MPC's motion to strike the complaints in MURs and 1704.

2) Deny MPC's motion to strike the evidence obtained by private investigators in MURs and 1704.

3) Approve the attached letter.

Attachments
Motion to Strike
Letter to counsel

3/ We note that MPC is contemplating filing a complaint against NRWC alleging that its use of corporate funds to hire the investigators violates 2 U.S.C. § 441b. The Commission has never found that funds expended by a corporation or labor union in connection with the filing of a complaint violate that section.

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Washington, D.C. 20007
Telephone: 202-625-1900

MONDALE

June 25, 1984

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

RE: MURs 1704 - Motion to Strike

Dear Mr. Steele:

This letter is submitted by the Mondale for President Committee, Inc. ("MPC") in reference to the complaints filed by the National Right to Work Committee ("NRWC") and Ralph Martin (Bud) Bettinga in MURs and 1704 ("the complaints"). MPC's responses to the allegations in these complaints are due on July 2, June 29, and June 25, respectively. In these responses, MPC will urge the Commission to dismiss the complaints because there are no facts alleged which provide reason to believe that a violation of the Federal Election Campaign Act ("the Act") has occurred.

MPC believes that there are serious threshold issues concerning these complaints which the Commission must consider before reaching the merits of their allegations. This letter, therefore, constitutes a motion to strike the complaints because they are the product of unlawful conduct which should not be sanctioned by the Commission. NRWC's unlawful conduct was planned early this year, when it publicly announced that it was undertaking an extensive effort to infiltrate and spy on the

Attachment 1 (1 of 3)

Paid for by Mondale for President, Inc.

Mohdale campaign and Mondale supporters through the use of paid private investigators. Judging from these complaints, NRWC has been true to its word. NRWC now seeks to invoke the Commission's jurisdiction based on information gathered by these paid infiltrators.

There are two compelling reasons why the Commission should refuse to consider these complaints. First, the complaints are based on information gained by a deliberate campaign to infiltrate and obtain information from MPC under false pretenses. Strong public policy considerations compel dismissal of complaints based on such reprehensible actions. Second, NRWC's scheme is, by its own public admission, continuing. There is substantial danger that failure by the Commission to reject the complaints will be interpreted by the NRWC, and by other organizations which might engage in similar dirty tricks, as a general green light to infiltrate opposition candidates and committees. This is directly contrary to the purposes for which the FECA was enacted -- that is, to prevent such campaign dirty tricks and ensure a fair and open political system. Perhaps even more serious, Commission consideration of the complaints could be interpreted as a specific approval of NRWC's plans to engage in continuing illegal activities. As a result, the Commission itself may be condoning whatever additional violations of law and constitutional rights could occur.

In order to avoid these potential consequences, MPC believes that there are only two courses available to the Commission: to refuse to consider these complaints or to refuse to consider any evidence or allegations based upon the "investigations" by the

Attachment 1 (2 of 3)

NRWC "private investigators".

Background

On February 15, 1984, a spokesman for the NRWC announced at a press conference that the organization intended to hire private detectives to infiltrate the Mondale campaign and various labor organizations which endorsed Mr. Mondale's candidacy. On May 18, 1984, the day the complaints were filed with the Commission, the head of NRWC boasted that his organization thus far had spent $75,000 and expected to spend another $25,000 toward its goal of infiltrating and disrupting Mondale campaign efforts. See Washington Post, May 19, 1984, p. A6. From the complaints alone it is apparent that NRWC hired at least six private investigators from Virginia and Illinois to infiltrate the Mondale campaign in Illinois. These private investigators spied on MPC and on union facilities and falsely represented themselves to be Mondale volunteers during the weeks immediately preceding the Illinois primary. Acting as volunteers, they eavesdropped on confidential conversations and improperly discarded and confiscated campaign literature, as evidenced by their own affidavits. Additional investigators were hired to spy upon the campaign in Pennsylvania as well.

The chilling effect of the NRWC's tactics on the Mondale campaign and its supporters has been considerable. When MPC staff members in Illinois learned that an NRWC spy had admitted to a television news reporter that he had gained access to confidential files, desks, computer records, and financial information of

Attachment 1 (3043)

the Mondale campaign,1/ staff members immediately took steps to reduce or eliminate volunteer input. Prospective volunteers were viewed with suspicion, and in some places, volunteers who were not known to the campaign were simply turned away for fear that they were NRWC infiltrators. Like any other campaign, MPC could not afford to have its political strategies known to or stolen by those publicly opposed to the election of its candidate. According to NRWC's president, as recently as May 18, 1984, NRWC's campaign of infiltration is continuing.

I. THE COMMISSION SHOULD REFUSE TO CONSIDER THESE COMPLAINTS BECAUSE PUBLIC POLICY REQUIRES THAT UNSCRUPULOUS ACTIVITIES SUCH AS THOSE OF NRWC BE DISCOURAGED

The very purposes for which the FEC was created are subverted by the type of actions NRWC has undertaken. MPC urges the Commission to reject these complaints because the Complainants' allegations are based on conduct (e.g., spying, lying, and infiltrating) which is anathema to the purposes of the very statute administered by the FEC. As stated cogently by Rep. Wright during the floor debates on the 1974 Amendments to the FECA:

> One cannot blame the average citizen for being more than a little sickened by the illegal use of spies, burglary, electronic surveillance, fake documents and phony charges against the opposition.

Legislative History of Federal Election Campaign Act Amendments of 1974 at 833. If Complainants' methods are in any way sanctioned, paid infiltrators will believe that they have the

1/ The NBC affiliate in Chicago aired two interviews with this NRWC "spy", Paul Kreeger, who admitted to gaining access to these confidential materials without permission.

Attachment 1 (40 of 13)

Commission's approval to undermine campaigns at all levels. The day may come when volunteers are shunned rather than welcomed by campaigns.

The underlying public policies of the Federal Election Campaign Act militate against the Commission's consideration of complaints based upon such unlawful and unscrupulous activities. This is not a case where a public spirited citizen inadvertently came across information concerning possible wrongdoing which was then turned over to the government. This was a deliberate, planned and extensive campaign to infiltrate and spy upon a political association. Public outrage over these types of tactics was the driving force behind enactment of the 1974 FECA amendments. Acceptance by the Commission of evidence obtained through an unlawful scheme of infiltration as a basis for an investigation would encourage NRWC and not only chill, but indeed, freeze the freedom of political association guaranteed to NRWC.

Courts have routinely observed that the Commission has an extremely sensitive mission, and thus a corresponding obligation to act in a manner that does not interfere with the constitutional rights of a committee or its individual supporters. See FEC v. Florida for Kennedy Cte., 681 F.2d 1281, 1284-85 (11th Cir. 1982); FEC v. Machinists NonPartisan Political League, 655 F.2d 380, 387 (D.C. Cir. 1981); FEC v. Central Long Island Tax Reform Immediately Cte., 616 F.2d 45, 54-55 (2d Cir. 1980) (Kaufman, J., concurring); see also Jones v. Unknown Agents of FEC, 613 F.2d 864, 874-877 (D.C. Cir. 1979). Initiating a Commission investigation based on NRWC's contemptuous tactics would

Attachment 1 (5 of 13)

directly conflict with the public policies underlying the Federal Election Campaign Act and the FEC's mission.

NRWC's actions are not only unscrupulous but also unlawful. Because the NRWC is a corporation2/, it may not use corporate treasury funds in connection with a federal election. 2 U.S.C. Section 441b(a); 11 C.F.R. Section 114.2(b). Yet that is precisely what NRWC, by its own admission, has done here. NRWC has paid $75,000 already, and plans to spend $25,000 more, to hire private detectives to perform volunteer work for the Mondale campaign. Even if the work performed by these volunteers had been legitimate -- that is, had a corporation which intended to further Mondale's election paid $75,000 to people to volunteer for the campaign -- such an expenditure would clearly violate the Act.3/ Regardless of whether or not NRWC's "volunteers" were personally committed to Mondale's candidacy, they distributed literature and made telephone calls on the candidate's behalf. NRWC's underlying plan obviously is to influence negatively the election of Mondale by filing complaints and issuing press releases. Thus, NRWC may very well have violated the Act by making corporate expenditures in connection with a federal election. 2 U.S.C. Section 441b(a).

MPC strongly believes that this infiltration is a matter of extreme seriousness. Indeed, MPC believes that the NRWC may have violated other federal statutes enacted to protect individuals

2/ See FEC v. National Right to Work Cte, 103 S. Ct. 552 (1982).

3/ MPC has not yet made a decision as to whether or not to file a complaint with the FEC on this matter.

Attachment 1 (6 of 13)

and campaigns from this form of activity. See, e.g., 42 U.S.C. Section 1985(3); 18 U.S.C. Section 1961 et seq. (RICO). MPC also believes that various state criminal laws may have been violated. See, e.g., Pennsylvania RICO statute; conspiracy to violate civil rights under the Illinois Elections Code; failure to register in Illinois as a private detective agency.

It would be against public policy for the Commission to consider complaints based upon such flagrant illegal activities. It is indisputable that the Commission has the authority, and should exercise it, to reject such complaints out of hand.

II. THE COMMISSION SHOULD TAKE IMMEDIATE STEPS TO MAKE CLEAR THAT IT DOES NOT SANCTION THE CONTINUING UNLAWFUL ACTIVITIES OF NRWC

The unlawful activities of NRWC -- if sanctioned in any manner by the government -- also pose substantial due process issues. In light of NRWC's announced intention to continue their infiltration, MPC believes that it is essential that the FEC take steps to disassociate itself from the NRWC's continued unlawful activity. Failure to reject this complaint in light of their announced continued wrongdoing could constitute tacit approval or even encouragement which could amount to state action.

The Commission obviously could not -- and would not -- send its employees to infiltrate the Mondale campaign under false pretenses, receive information from these employees, and then prosecute a complaint based strictly on information so gathered. Yet the information that is the basis for the instant complaints is the fruit of just that type of activity.

If the Commission acts on these complaints, it would do so with full knowledge of the continuing effort of NRWC to defraud

Attachment 1 (7 of 13)

MPC and intimidate its supporters, and of the avowed intention of NRWC to spend corporate funds to do so. See Statement by Reed Larson, President, National Right to Work Committee, May 18, 1984. Exhibit 1. Plainly, given NRWC's public announcement that its infiltration campaign will continue, acceptance of such evidence encourages their continued use of these tactics.

The right to associate freely for political purposes is of paramount importance under the First Amendment. A $100,000 corporate scheme to infiltrate a political campaign is plainly inconsistent with fundamental constitutional protections. The dangers to the political process of such schemes go far beyond the immediate violations of the rights of Mondale supporters. If organizations like NRWC believe that the Commission will give full consideration -- as a legitimate complaint -- to the products of such activities, infiltration and spying may become the rule rather than the exception. Infiltration of a political association, by self-appointed police, solely to see if information might be uncovered which might constitute some form of wrongdoing, serves no valid public purposes. This sort of vigilante activity cannot be tolerated in any context -- and certainly not where freedom of political association is at stake. The Commission must send a strong signal that these sorts of dirty tricks, which are directly contrary to the purposes and spirit of the FECA, will not be tolerated.

MPC respectfully suggests that there are only two ways to send this message: (1) the Commission should reject these three complaints without any further consideration; (2) alternatively,

Attachment 1 (80613)

and at an absolute minimum, the Commission should strike every affidavit attached to the complaints -- each of which contain information obtained under false pretenses -- and strike the allegations which are based upon them. This would be a less desirable alternative, because anything short of rejection of these complaints will appear to the public as Commission consideration of the complaints and may be construed as a signal to continue such unconscionable activity.

CONCLUSION

For the foregoing reasons, HPC urges the Commission to strike these complaints.

Respectfully submitted,

David M. Ifshin By CWO
David M. Ifshin
General Counsel

Carolyn U. Oliphant
Carolyn U. Oliphant
Deputy General Counsel

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Attachment 1 (9 of 13)

Statement by Reed Larson
President, National Right to Work Committee
May 18, 1984

I am here this morning to announce findings of the National Right to Work Committee's investigation into the illegal use of compulsory union dues for political purposes. The investigation, launched three months ago today, is the most extensive probe ever conducted of Big Labor's massive political apparatus. We've had private investigators on the hustings since February. Our findings reveal solid evidence of federal election law violations and documentation of forced-dues politicking -- the illegal use of compulsory union dues for partisan political causes.

Let me say that today's announcement is just the first of several public disclosures of evidence gathered in the Committee's continuing probe of Big Labor's role in the 1984 presidential race.

Today, I will release all that I can. But much of the Committee's evidence must be kept under wraps until further documentation can be gathered. To release all of our findings at this time would jeopardize the continuing investigation. I have no doubt that, given Committee findings, Big Labor politicos and Mondale campaign officials would scramble to doctor their records and thus evade charges of election law violations.

As the investigation continues -- and additional evidence can be released -- we will keep you appraised of our findings.

Attachment 1 (10 of 13)

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As for now, you have before you three complaints prepared by the National Right to Work Committee based on our investigation and ready to be filed with the Federal Election Commission. I will summarize these complaints.

First, it is obvious from our investigation that the Mondale campaign -- working in close coordination with organized labor -- has established and governed the so-called Mondale delegate committees as a back-door outlet for political contributions far beyond the legal limit.

These delegate committees exist primarily to launder Big Labor's political contributions and to circumvent federal spending limits.

Second, we have gathered solid, detailed evidence that the so-called "delegate committees" are, in fact, a sham. It is clear from our evidence that these delegate committees are simply branch offices of the Mondale campaign. They are, therefore, limited by law to receive no more than $5,000 in campaign contributions from Big Labor political action committees.

What's more, we have found that these union PACs -- those named as respondents in the complaints -- are affiliated with each other and, therefore, are limited by law to contributions of no more than $5,000, <u>in the aggregate</u>, to the Mondale campaign and its branch offices -- the so-called delegate committees.

Obviously, these limits have been violated in the extreme.

Attachment 1 (11 of 13)

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To cite just one example of this affiliation, I note an AFL-CIO COPE meeting on March 22, 1984. This meeting, chaired by COPE director John Perkins, was attended by 15-16 union agents.

On or within seven days of that meeting, checks totaling $133,440 in union PAC contributions were issued to Mondale "delegate committees."

In brief, our investigation reveals beyond a doubt that these Mondale delegate committees are so closely affiliated with the Mondale campaign as to be indistinguishable from it. Further, we conclude from the evidence presented that these delegate committees have been established as clearing houses to channel union PAC money into the Mondale campaign and circumvent federal election spending limits.

Two additional FEC complaints -- you have copies -- charge the United Steelworkers union, the AFL-CIO Committee on Political Education and the Amalgamated Clothing and Textile Workers union with other violations of federal election laws.

Specifically, we have documented illegal warehousing and distribution of campaign propaganda and illegal communication with the general public. Compounding these violations, union officials have failed to report certain campaign activity either as independent expenditures or as contributions to Mondale.

Finally, it is important to note that the charges in these complaints are substantiated by evidence gathered by

Attachment 1 (12 of 13)

the National Right to Work Committee and that these complaints are being filed on behalf of working men and women who are forced, through compulsory union dues, to finance political candidates and causes they oppose.

I remind you also that 1) National Right to Work attorneys were successful in the Supreme Court last month, winning clear restrictions on the use of compulsory union dues for non-bargaining expenditures -- such as politics and that 2) the National Right to Work Committee is the driving force behind legislation now pending in Congress to outlaw the use of forced union dues for all political and ideological purposes.

The National Right to Work Committee is out front on the issue of forced-dues politicking, and we intend to stay there. We are getting results across the board -- from the Supreme Court and Congress to local union halls across the country.

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Attachment 4/13 of 13

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

David M. Ifshin, Esq.
Carolyn U. Oliphant, Esq.
Mondale for President Committee, Inc.
2201 Wisconsin Avenue, N.W.
Washington, D.C. 20007

Re: MURs and 1704

Dear Mr. Ifshin and Ms. Oliphant:

This responds to your motion to strike the complaints in MURs and 1704 or, in the alternative, to strike certain evidence from the Commission's consideration of those MURs.

On , 1984, the Commission considered your motion and determined that, under the circumstances presented, it does not have the authority to grant your motion. Accordingly, your motion to strike the complaints and certain evidence in MURs and 1704 is denied.

If you have any questions, please contact Lois Lerner at 523-4143.

Sincerely,

Charles N. Steele
General Counsel

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Attachment 2

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

MONDALE

July 30, 1984

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

Re: MURS and 1704

Dear Mr. Steele:

On June 25, 1984, the Mondale for President Committee, Inc. (MPC) asked the Commission to reject the complaints in MURS and 1704, because of complainant's unscrupulous, unlawful infiltration of and spying on the Mondale campaign. In the cover letter submitting this request, MPC asked the Commission to withhold further determination on these three matters until the tapes or transcripts of certain television interviews with an NRWC "spy" could be viewed. This has now been done and this further submission provides the results of this review.

MPC requested that the television station involved, WMAQ-TV, Channel 5, Chicago, Illinois, provide either the spy tapes, or transcripts of those tapes, to MPC so the tapes or transcripts could be forwarded to the Commission. The television station declined to do this, but did allow an MPC volunteer lawyer to view the tapes and make notes. This attorney has prepared an affidavit setting forth the contents of the

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tapes he viewed, which is attached to this letter. The station has informed MPC that it will turn over the tapes to the Commission in response to an FEC subpoena.

Facts Shown By The Tapes

The tapes involved record two television segments aired in March 1984 by WMAQ. Two NRWC spies -- Paul M. Kurgan and Howard Miller -- are interviewed on the tapes.

The facts revealed by these tapes are truly shocking and revive memories of the Watergate era when campaign infiltration was unfortuately a commonplace occurrence. The tapes show, inter alia, that:

- Paul M. Kurgan was an undercover agent who worked for a private detective firm in the Washington, D.C. area.
- Kurgan's assignment for that firm was to infiltrate the Mondale Illinois campaign staff to uncover embarrassing facts about organized labor's role in the Mondale campaign.
- Kurgan tried to recruit a WMAQ reporter named Rich Samuels to help him obtain information from the Mondale Illinois campaign staff. Samuels' reward would have been a story provided by Kurgan.

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- Kurgan came to Chicago around two and one-half weeks before his taped interview and volunteered at the Chicago headquarters of the Illinois Mondale campaign. Among other things, he worked in the staff room, did volunteer mailings, and drove in a Mondale motorcade.

- Kurgan transmitted information he gathered while working as a volunteer for the Mondale Illinois campaign to Kurgan's Washington area employer, which in turn passed it on to the "client".

- On March 15, 1984, Samuels called Kurgan, and they agreed to meet in front of the Richard J. Daley Center in downtown Chicago. At that meeting, Kurgan gave Samuels a typewritten list of further information about the Mondale campaign that Kurgan needed. Kurgan also then admitted that he had surreptitiously "accessed" the Mondale computer and had surreptitiously inspected Mondale financial data.

- Kurgan also informed Samuels at this meeting that he had worked on telephone banks for the Mondale campaign.

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- Howard Miller, who was also interviewed on tape, is a private detective with an office in Falls Church, Virginia. Miller controlled a team of spies who infiltrated the Mondale Illinois campaign and the phone banks run by organized labor on Mondale's behalf.

- Miller's spies posed as volunteers for the Mondale Illinois campaign; one of those spies was Kurgan.

- After Kurgan was publicly unmasked by Samuels, Miller quickly flew to Chicago and dissolved his network of spies. Miller refused to disclose the name of the "client" for whom he had organized the team of spies.1/

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The Complaints Should Be Dismissed Because Of NRWC's Egregious Conduct

The conduct described above, and in previous filings with the Commission, is not only egregious and dishonest, it is unlawful. It is a crime to use corporate funds to influence or affect the election of any candidate for federal office,2/ but

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1/ The Complaint submitted by NRWC in MUR 1704 shows that Howard Miller was hired by NRWC to perform clandestine operations in the Mondale campaign. See Attachment K.

2/ 2 U.S.C. § 441b(a)

this is precisely what NRWC has done by spending some $100,000 for its spying and infiltration efforts to defeat Walter Mondale. It is unlawful to conspire to "intimidate" any citizen entitled to vote "from giving his support or advocacy in a legal manner" to a candidate for federal office,[3] but this is precisely what NRWC has done by publicized activities[4] that plainly intimidate persons lawfully working for the MPC.[5]

MPC already has contended that NRWC's complaints should be dismissed for two essential reasons. First, strong public policy reasons compel the dismissal of complaints based on a reprehensible, unlawful scheme to infiltrate a campaign and gain information from it under false pretenses. Second, the Commission should not, implicitly or explicitly, condone such activities that, NRWC has confirmed, are continuing. For the Commission in any way to give its imprimatur to such illegal conduct would serve to encourage future spying, infiltration,

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3/ 42 U.S.C. § 1985(3).

4/ NRWC publicly has boasted about its spying campaign on May 18, 1984. See Washington Post, May 19, 1984, p. A6.

5/ Various Illinois statutes apparently were also violated. See, e.g., ILL. ANN. STAT. ch. 46 § 29-4, which make it a felony to prevent any person by "intimidation . . . from . . . lawfully supporting . . . the nomination or election of any person for public office." See further ILL. ANN. STAT. ch. 38, § 16-9. ("Unlawful use of a computer"), which makes it a crime, inter alia, to use computer data without the consent of the owner.

pilfering and similar dirty tricks by NRWC and others. The Commission's task is to prevent improper campaign activities, not to give them support.

The additional facts presented above bring into even clearer focus the nature of NRWC's intolerable actions. What follows below are further legal reasons for the principal relief the MPC seeks -- dismissal of the complaints because of NRWC's unconscionable conduct.

In MUR 1704, NRWC asks that the Mondale campaign "be ordered to return [allegedly] excessive contributions and . . . be ordered to pay the maximum civil penalty for [an allegedly] knowing and willful violation." NRWC thus is in an analogous position to a private plaintiff that seeks injunctive relief from a court. Consequently, for reasons similar to those underlying the "unclean hands" doctrine, NRWC's complaints should be dismissed.

The "unclean hands" doctrine is based on the maxim that "he who comes into equity must come with clean hands." Precision Company v. Automotive Co., 324 U.S. 806, 814 (1945). The doctrine bars relief to "those guilty of improper conduct in the matters to which they seek relief." C.J.S. Equity § 93 at 1006. Courts apply the doctrine "not to favor a defendant, but because of the interest of the public." Bell and Howard

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Co. v. Bliss, 262 F. 131, 135 (7th Cir. 1919). In particular, courts have employed the doctrine to prevent the judicial process from abuse by litigants attempting to use the courts to further fraudulent or illegal schemes. As the Supreme Court has said, "to aid such a party in such a case would make this court the abettor of inequity." Keystone Co. v. Excavator Co., 290 U.S. 240, 245 (1933), citing Bein v. Heath, 47 U.S. (6 How.) 228, 247 (1848). See also Precision Co. v. Automotive Co., 324 U.S. at 814.

The unclean hands doctrine applies when three conditions are present: (1) the conduct of the applicant is fraudulent, illegal, or otherwise unconscionable; (2) the misconduct relates directly to the subject matter of the dispute; and (3) application of the doctrine will further the public interest and will not work an injustice. C.J.S. Equity §§ 93-98.

As to the first criterion, the "misconduct need not necessarily have been of such a nature to be punishable as a crime so as to justify legal proceedings of any character. Any willful act concerning the cause of action which rightfully can be said to transgress equitable standards of conduct is sufficient cause for the invocation of the [doctrine] . . ." Precision Co., 324 U.S. at 815. See also Hanson and Associates v. Farmers Cooperative Assoc., 403 F.2d 65, 70 (8th Cir. 1968)

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(wrongdoing need not be "sufficient to constitute a basis for legal action"). Thus, courts have applied the doctrine to bar recovery for applicants (1) who failed to report a competitor's perjury to a patent office and instead pressured the competitor to assign the patent to the applicant (Precision Co., supra), (2) who mismanaged a company to obtain better terms for an option to buy the company (Hanson & Associates, supra), and (3) who concealed evidence in a patent infringement suit (Keystone Co. v. Excavator Co., 290 U.S. 240 (1933)). In the present circumstance, the facts show more than mere unconscionable conduct; rank illegalities are present.

The second condition is that "the inequitable conduct which will defeat plaintiff's recovery must be conduct with reference to the transaction on which he bases his suit . . ." H. McClintock, Handbook of the Principles of Equity 62 (2d Ed. 1948). In other words, the misconduct must be related in some way to the subject matter of the suit or to abuses of the judicial processes regarding the action before the court. For example, the Supreme Court barred a plaintiff from recovering in a suit alleging five patent violations where plaintiff improperly concealed evidence regarding one of those patents. Keystone Co. v. Excavator Co., supra. In another patent infringement case, the Court denied recovery because plaintiff attempted to expand a patent's protection and contravened

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congressional policies found in the antitrust laws. Morton Salt v. G.S. Suppiger Co., 314 U.S. 488, 493 (1942). In the immediate situation, NRWC's illegal conduct provided information on which it based its complaints, and the second condition allowing the doctrine's application is plainly met.

The third condition is that application of the doctrine be consistent with the public interest. In Morton Salt, the Supreme Court applied the doctrine to further the public interest, stating that "additional consideration must be taken into account where maintenance of the suit concerns the public interest as well as private interest of suitors . . ." The public interest here demands that the Commission take all possible steps to deter NRWC's clandestine, illegal activities. To do so will not prevent the Commission from investigating the alleged violations of federal election laws here involved. If the NRWC complaints are dismissed, the delegate committee issue will still be decided by the Commission since it has been raised in MUR 1667.

Although the doctrine of clean hands traditionally has been applied only in equitable proceedings, a number of courts have used it in actions at law. See, e.g. Ranchers Exploration and Development Co. v. Anaconda Co., 248 F. Supp. 708, 728 (C.D. Utah 1965) ("the unclean hands doctrine, in its proper

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application, is not limited to action purely equitable . . ."); Union Pacific Railroad Co. v. Chicago and Northwestern Railroad Co., 226 F. Supp. 400, 410 (N.D. Ill. 1964) ("the clean hands doctrine is not peculiar to equity, but expresses a general principle equally applicable to damage actions"); Fibreboard Paper Product Corp. v. East Bay Union of Machinists, 39 Cal. Reptr. 64, 97 (1964) (". . . the equitable defense of clean hands is available in this state as a defense to a legal action.").

Moreover, the National Labor Relations Board on occasion has applied the unclean hands doctrine to administrative actions similar to FEC proceedings.6/ The NLRB uses the doctrine to dismiss actions that abuse its administrative processes to further the illegal or unethical ends of the complaining parties. For example, the NLRB dismissed a complaint by the Meatcutter's Union against a rival union because "we will not countenance a charging party misusing the Board's processes by constantly filing and withdrawing repetitious charges both with and without merit . . ." Fernandez

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6/ The NLRB, like the FEC, receives complaints from individuals regarding violations of a federal act, investigates those charges, and attempts to obtain compliance with the federal laws under its jurisdiction. Like the Federal Election Campaign Act, the federal labor laws provide that only the agency can act on an initial complaint to enforce the federal act under its jurisdiction.

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Supermarket, Inc., 203 NLRB 568, 569 (1973). The NLRB dismissed a Teamsters complaint against an incumbent union after the NLRB learned that the Teamsters had persuaded an employer to hire two employees knowing that the rival union would demand their discharge -- an event allowing the Teamsters to file NLRB charges against the rival union. The NLRB observed that "the Board's process has . . . been invoked . . . for the sole purpose of getting the Board to assist the Teamsters in its scheme . . ." Vaughn Bower, 93 NLRB 1147, 1153-54 (1951). See also Laura Modes Co., 144 NLRB 1592 (1953) (NLRB declined to provide remedy because of complainant union's violence against employer); Doral Beach Hotel, 245 NLRB 774 (1979).

The Supreme Court has upheld the NLRB's authority to dismiss complaints because of a complainant's misconduct. In NLRB v. Indiana and Michigan Electric Co., 318 U.S. 9, 18-19 (1943), the Court declared:

> The Board has wide discretion in the issue of complaints . . . [I]t is not required by the statute to move on every charge; it is merely enabled to do so. It may decline to be imposed on or to submit its processes to abuse . . .

Like the NLRB, the FEC has discretion to dismiss a complaint without an investigation. Congress contemplated such action in 2 U.S.C. § 437(g)(a)(1), which provides that the

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Commission need not provide a respondent the opportunity to answer a complaint if, prior to a "reason to believe" investigation, it votes to dismiss the complaint. See also 11 C.F.R. § 111.6(b).

Surely, dismissal here is appropriate where the NRWC has used illegal, unscrupulous means to attempt to defeat Walter Mondale and attack organized labor, but nonetheless seeks the Commission's acquiescence -- indeed, its cooperation -- in this reprehensible scheme. Any other action by the Commission, besides dismissal, inevitably would encourage unlawful vigilante election activities, a result the Commission obviously should avoid. The Commission should dismiss NRWC's complaints in MURS and 1704.

Sincerely,

David M. Ifshin

David M. Ifshin
General Counsel

Carolyn U. Oliphant THL

Carolyn U. Oliphant
Deputy General Counsel

8504053907

STATE OF ILLINOIS)
) SS.
COUNTY OF COOK)

AFFIDAVIT OF
ERIC N. MACEY

Eric N. Macey, being first duly sworn, on oath deposes and states as follows:

1. I am an attorney licensed to practice law in the State of Illinois and a partner in the law firm of Levy and Erens located at Suite 1100, 208 South LaSalle Street, Chicago, Illinois 60604.

2. On Thursday morning, July 26, 1984, the law firm of Reuben & Proctor located at 19 South LaSalle Street, Chicago, Illinois 60603, made available to me for viewing a videotape ("the Tape") of two investigative reports compiled by Rich Samuels ("Samuels"), a television reporter for WMAQ-TV, Channel 5 in Chicago, Illinois. The duration of the Tape was approximately eleven minutes. On information and belief, the aforesaid investigative reports were included as part of two separate newscasts produced by WMAQ-TV.

3. I viewed the Tape three times and, based on that viewing and my notes thereof, the Tape indicated as follows:

- Paul M. Kurgan ("Kurgan") was an "undercover mole" who worked for a private detective firm in the Washington, D.C. area.
- Kurgan was an ex-marine who had lived in Fairfax,

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Virginia and had previously worked for the Columbia, Maryland branch of the Ecoles security firm.

- Kurgan's assignment for the private detective firm who employed him was to "infiltrate" the Illinois campaign staff of Democratic presidential nominee Walter F. Mondale ("Mondale"). Kurgan's goal was to "dig up dirt on organized labor's role" in the Mondale campaign.
- Kurgan tried to recruit Samuels to help him in connection with infiltrating the Illinois campaign staff of Mondale in exchange for giving Samuels a story.
- Kurgan signed his name as "Paul M. Kurgan" on the volunteer sign-up sheet at the Chicago headquarters of the Illinois Mondale campaign.
- Kurgan came to Chicago two and one-half weeks prior to the date of the Tape and presented himself as a volunteer for Mondale at the Chicago headquarters of the Illinois Mondale campaign.
- In performing volunteer services, Kurgan worked in the staff room, did volunteer mailings, and drove in a Mondale motorcade on at least one occasion.
- Kurgan admitted that information he gathered while working as a volunteer for the Illinois Mondale campaign was passed on to his employer in the Washington, D.C. area which, in turn, passed it on to the "client"; however, Kurgan claimed he was never told who the "client" was.

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- Reed Larson ("Larson"), the President of the National Right to Work Committee, charged that the use of union dues to support Walter Mondale was "legalized extortion." Larson stated that the National Right to Work Committee was hiring private investigators to use all lawful means to gather information conerning organized labor's activities in the Mondale campaign.
- The National Right to Work Committee is based in Springfield, Virginia and has been "waging a pitched battle against organized labor" for more than three decades.
- One of the announced goals of the National Right to Work Committee is to infiltrate the Mondale campaign to ascertain the role of organized labor therein, and, in pursuance of that objective, Larson stated that he envisions the cost of the project to go well into six figures. According to Samuels, the goals described to him by Kurgan were consistent with the goals announced by the National Right to Work Committee.
- March 13, 1984 was the first time Kurgan surfaced in Illinois. The occasion was a Mondale fund raiser at which Kurgan was wearing a Mondale for President button. At that fund raiser, Kurgan approached Samuels and asked to speak with him in private.
- During that private conversation, Kurgan disclosed to Samuels that he was not really working for the Mondale

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campaign but was working for a group trying to gather information on the campaign.

- Samuels asked Kurgan if he was working for the National Right to Work Committee, but Kurgan only smiled in response.
- Kurgan told Samuels in their private conversation that he was trying to get certain telephone records but was not having much luck and thought Samuels would have better access to the telephone records. Kurgan then gave Samuels a telephone number which was an answering service.
- Late Thursday afternoon (i.e., March 15, 1984), Samuels called Kurgan, and they agreed to meet at the Picasso statue in front of the Richard J. Daley Center in downtown Chicago. At that meeting, Kurgan gave Samuels a typewritten list of information Kurgan needed on the Mondale campaign. In addition, Kurgan admitted that he had "accessed the Mondale computer" at the Chicago Mondale campaign headquarters "when nobody was looking" and that he had "inspected Mondale financial data" at the campaign headquarters "when nobody was looking."
- At the top of Kurgan's typewritten list were questions concerning "labor union telephone banks."
- Kurgan also informed Samuels at this second meeting that he had hired two bi-linguals to obtain information on Spanish voters and that he had been working on telephone

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banks for the Mondale campaign.

- That evening, Samuels asked Kurgan to speak on camera, but Kurgan declined. Kurgan has never been seen again by Samuels or the Mondale campaign staff.
- Howard Miller ("Miller") is a private detective with an office in Falls Church, Virginia. Miller controlled a "team of spies" who infiltrated the Mondale campaign, including phone banks run by organized labor on Mondale's behalf.
- Miller admitted looking into alleged labor activities in the Mondale campaign.
- Miller's spies posed as volunteers for the Mondale campaign, and "one of those spies was Kurgan."
- After Kurgan was publicly unmasked by Samuels, Miller quickly flew to Chicago and dissolved his network of spies. Miller refused to disclose the name of the "client" on whose behalf he had organized a team of spies; however, the National Right to Work Committee publicly announced it hired private detectives to spy on labor's contribution to Walter Mondale.
- Larson previously hired the private detective firm of Associated Investigators located in Washington, D.C. to conduct spying activities. These activities included:
  - spying on the senatorial campaign of Donald Frazier in Minnesota;

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- posing as graduate students to infiltrate the Georgia State archives to look at Jimmy Carter campaign records; and
- pumping a union staffer for information at the Hyatt Regency O'Hare Hotel in Chicago, Illinois.

4. I have personal knowledge of the foregoing, and if I were ever sworn as a witness, I could competently testify thereto.

Further, Affiant sayeth naught.

Eric N. Macey

Eric N. Macey

SUBSCRIBED AND SWORN to before me this 26th day of July, 1984.

Margaret J. Hirman

Notary Public

8504030913



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 3, 1984

Henry E. Howell
Howell, Daugherty, Brown and
Lawrence
1 East Plume Street
P.O. Box 3688
Norfolk, Virginia 23514

Re: MUR 1704
Mondale 2nd C.D. Delegate
Recruitment Committee
Pauline Davis, treasurer

Dear Mr. Howell:

This responds to your letter of June 26, 1984, wherein you requested an extension of time to file a response to the complaint in the above-captioned matter. The Commission on July 3, 1984, considered your request and voted not to grant an extension of time. The response remains due on the July 9, 1984.

Please be advised that absent a designation of counsel form naming you as counsel, the Commission cannot communicate further with you with regard to this matter. See 11 C.F.R. § 111.23. If you intend to represent the Mondale 2nd C.D. Delegate Committee and Ms. Davis, as treasurer, please have the enclosed Designation of Counsel form completed.

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at 523-4143.

Sincerely,

Charles N. Steele

Charles N. Steele
General Counsel

Enclosure

cc: Pauline Davis

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Mondale 2nd C.D. Delegate) MUR 1704
Recruitment Committee,)
Pauline Davis, treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on July 3, 1984, the Commission decided by a vote of 4-1 to deny the request for an extension of time to respond to the complaint in MUR 1704 submitted by the Mondale 2nd C.D. Delegate Recruitment Committee, and Pauline Davis, as treasurer.

Commissioners Aikens, Elliott, McGarry, and Reiche voted affirmatively for the decision; Commissioner McDonald dissented; Commissioner Harris did not cast a vote.

Attest:

7-3-84
Date

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

Received by the Commission Secretary on July 2, 1984 at 11:57 a.m.
Circulated to the Commissioners on July 2, 1984 at 4:00 p.m.
Voting deadline: July 3, 1984 at 4:00 p.m.

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RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

84 JUL 2 A11: 51

July 2, 1984

SENSITIVE

MEMORANDUM TO: The Commission

FROM: Charles N. Steele
General Counsel

SUBJECT: Request for Extension of Time in
MUR 1704
Mondale 2nd C.D. Delegate Recruitment
Committee, Pauline Davis, treasurer

The Office of the General Counsel has received an additional request for an extension of time from a respondent in MUR 1704. This Office has reviewed the request and does not believe, in light of the urgency of this matter, that the requested extension warrants approval by the Commission.

Recommendation

Deny the request for an extension of time to respond to the complaint in MUR 1704 submitted by the Mondale 2nd C.D. Delegate Recruitment Committee, Pauline Davis, as treasurer.

Attachments
1. Request for extension
2. Proposed letter

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RECEIVED BY THE FEC
84 JUN 20 P12:26

LAW OFFICES OF

HOWELL, DAUGHERTY, BROWN & LAWRENCE

HENRY E. HOWELL, JR.
GUY DAUGHERTY
ROBERT E. BROWN
J. GRAY LAWRENCE, JR.

ROBERT H. ROHM
HENRY E. HOWELL, III

ONE EAST PLUME STREET
POST OFFICE BOX 3688
NORFOLK, VIRGINIA 23514
TELEPHONE (804) 623-7234

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, Paulina 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.

Attachment 1, page 1

With kind regards, I am

Sincerely,

HOWELL, DAUGHERTY, BROWN & LAWRENCE

By: Henry E. Howell p&p
Henry E. Howell, Jr.

HEH,Jr./ pep

cc: Lyn Olithant, Esquire
George Murphy

8504030919

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Henry E. Howell
Howell, Daugherty, Brown and
Lawrence
1 East Plume Street
P.O. Box 3688
Norfolk, Virginia 23514

Re: MUR 1704
Mondale 2nd C.D. Delegate
Recruitment Committee
Pauline Davis, treasurer

Dear Mr. Howell:

This responds to your letter of June 26, 1984, wherein you requested an extension of time to file a response to the complaint in the above-captioned matter. The Commission on , 1984, considered your request and voted not to grant an extension of time. The response remains due on the July 9, 1984.

Please be advised that absent a designation of counsel form naming you as counsel, the Commission cannot communicate further with you with regard to this matter. See 11 C.F.R. § 111.25. If you intend to represent the Mondale 2nd C.D. Delegate Committee and Ms. Davis, as treasurer, please have the enclosed Designation of Counsel form completed.

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

cc: Pauline Davis

Attachment 2

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

MONDALE

Court 3862

June 25, 1984

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

RE: MURs 1704 - Motion to Strike

Dear Mr. Steele:

This letter is submitted by the Mondale for President Committee, Inc. ("MPC") in reference to the complaints filed by the National Right to Work Committee ("NRWC") and Ralph Martin (Bud) Hettinga in MURs and 1704 ("the complaints"). MPC's responses to the allegations in these complaints are due on July 2, June 29, and June 25, respectively. In these responses, MPC will urge the Commission to dismiss the complaints because there are no facts alleged which provide reason to believe that a violation of the Federal Election Campaign Act ("the Act") has occurred.

MPC believes that there are serious threshold issues concerning these complaints which the Commission must consider before reaching the merits of their allegations. This letter, therefore, constitutes a motion to strike the complaints because they are the product of unlawful conduct which should not be sanctioned by the Commission. NRWC's unlawful conduct was planned early this year, when it publicly announced that it was undertaking an extensive effort to infiltrate and spy on the

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Mondale campaign and Mondale supporters through the use of paid private investigators. Judging from these complaints, NRWC has been true to its word. NRWC now seeks to invoke the Commission's jurisdiction based on information gathered by these paid infiltrators.

There are two compelling reasons why the Commission should refuse to consider these complaints. First, the complaints are based on information gained by a deliberate campaign to infiltrate and obtain information from MPC under false pretenses. Strong public policy considerations compel dismissal of complaints based on such reprehensible actions. Second, NRWC's scheme is, by its own public admission, continuing. There is substantial danger that failure by the Commission to reject the complaints will be interpreted by the NRWC, and by other organizations which might engage in similar dirty tricks, as a general green light to infiltrate opposition candidates and committees. This is directly contrary to the purposes for which the FECA was enacted -- that is, to prevent such campaign dirty tricks and ensure a fair and open political system. Perhaps even more serious, Commission consideration of the complaints could be interpreted as a specific approval of NRWC's plans to engage in continuing illegal activities. As a result, the Commission itself may be condoning whatever additional violations of law and constitutional rights could occur.

In order to avoid these potential consequences, MPC believes that there are only two courses available to the Commission: to refuse to consider these complaints or to refuse to consider any evidence or allegations based upon the "investigations" by the

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NRWC "private investigators".

Background

On February 15, 1984, a spokesman for the NRWC announced at a press conference that the organization intended to hire private detectives to infiltrate the Mondale campaign and various labor organizations which endorsed Mr. Mondale's candidacy. On May 18, 1984, the day the complaints were filed with the Commission, the head of NRWC boasted that his organization thus far had spent $75,000 and expected to spend another $25,000 toward its goal of infiltrating and disrupting Mondale campaign efforts. See Washington Post, May 19, 1984, p. A6. From the complaints alone it is apparent that NRWC hired at least six private investigators from Virginia and Illinois to infiltrate the Mondale campaign in Illinois. These private investigators spied on MPC and on union facilities and falsely represented themselves to be Mondale volunteers during the weeks immediately preceding the Illinois primary. Acting as volunteers, they eavesdropped on confidential conversations and improperly discarded and confiscated campaign literature, as evidenced by their own affidavits. Additional investigators were hired to spy upon the campaign in Pennsylvania as well.

The chilling effect of the NRWC's tactics on the Mondale campaign and its supporters has been considerable. When MPC staff members in Illinois learned that an NRWC spy had admitted to a television news reporter that he had gained access to confidential files, desks, computer records, and financial information of

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the Mondale campaign,1/ staff members immediately took steps to reduce or eliminate volunteer input. Prospective volunteers were viewed with suspicion, and in some places, volunteers who were not known to the campaign were simply turned away for fear that they were NRWC infiltrators. Like any other campaign, MPC could not afford to have its political strategies known to or stolen by those publicly opposed to the election of its candidate. According to NRWC's president, as recently as May 18, 1984, NRWC's campaign of infiltration is continuing.

I. THE COMMISSION SHOULD REFUSE TO CONSIDER THESE COMPLAINTS BECAUSE PUBLIC POLICY REQUIRES THAT UNSCRUPULOUS ACTIVITIES SUCH AS THOSE OF NRWC BE DISCOURAGED

The very purposes for which the FEC was created are subverted by the type of actions NRWC has undertaken. MPC urges the Commission to reject these complaints because the Complainants' allegations are based on conduct (e.g., spying, lying, and infiltrating) which is anathema to the purposes of the very statute administered by the FEC. As stated cogently by Rep. Wright during the floor debates on the 1974 Amendments to the FECA:

> One cannot blame the average citizen for being more than a little sickened by the illegal use of spies, burglary, electronic surveillance, fake documents and phony charges against the opposition.

Legislative History of Federal Election Campaign Act Amendments of 1974 at 833. If Complainants' methods are in any way sanctioned, paid infiltrators will believe that they have the

1/ The NBC affiliate in Chicago aired two interviews with this NRWC "spy", Paul Kreeger, who admitted to gaining access to these confidential materials without permission.

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Commission's approval to undermine campaigns at all levels. The day may come when volunteers are shunned rather than welcomed by campaigns.

The underlying public policies of the Federal Election Campaign Act militate against the Commission's consideration of complaints based upon such unlawful and unscrupulous activities. This is not a case where a public spirited citizen inadvertently came across information concerning possible wrongdoing which was then turned over to the government. This was a deliberate, planned and extensive campaign to infiltrate and spy upon a political association. Public outrage over these types of tactics was the driving force behind enactment of the 1974 FECA amendments. Acceptance by the Commission of evidence obtained through an unlawful scheme of infiltration as a basis for an investigation would encourage NRWC and not only chill, but indeed, freeze the freedom of political association guaranteed to MPC.

Courts have routinely observed that the Commission has an extremely sensitive mission, and thus a corresponding obligation to act in a manner that does not interfere with the constitutional rights of a committee or its individual supporters. See FEC v. Florida for Kennedy Cte., 681 F.2d 1281, 1284-85 (11th Cir. 1982); FEC v. Machinists NonPartisan Political League, 655 F.2d 380, 387 (D.C. Cir. 1981); FEC v. Central Long Island Tax Reform Immediately Cte., 616 F.2d 45, 54-55 (2d Cir. 1980) (Kaufman, J., concurring); see also Jones v. Unknown Agents of FEC, 613 F.2d 864, 874-877 (D.C. Cir. 1979). Initiating a Commission investigation based on NRWC's contemptuous tactics would

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directly conflict with the public policies underlying the Federal Election Campaign Act and the FEC's mission.

NRWC's actions are not only unscrupulous but also unlawful. Because the NRWC is a corporation2/, it may not use corporate treasury funds in connection with a federal election. 2 U.S.C. Section 441b(a); 11 C.F.R. Section 114.2(b). Yet that is precisely what NRWC, by its own admission, has done here. NRWC has paid $75,000 already, and plans to spend $25,000 more, to hire private detectives to perform volunteer work for the Mondale campaign. Even if the work performed by these volunteers had been legitimate -- that is, had a corporation which intended to further Mondale's election paid $75,000 to people to volunteer for the campaign -- such an expenditure would clearly violate the Act.3/ Regardless of whether or not NRWC's "volunteers" were personally committed to Mondale's candidacy, they distributed literature and made telephone calls on the candidate's behalf. NRWC's underlying plan obviously is to influence negatively the election of Mondale by filing complaints and issuing press releases. Thus, NRWC may very well have violated the Act by making corporate expenditures in connection with a federal election. 2 U.S.C. Section 441b(a).

MPC strongly believes that this infiltration is a matter of extreme seriousness. Indeed, MPC believes that the NRWC may have violated other federal statutes enacted to protect individuals

2/ See FEC v. National Right to Work Cte, 103 S. Ct. 552 (1982).

3/ MPC has not yet made a decision as to whether or not to file a complaint with the FEC on this matter.

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and campaigns from this form of activity. See, e.g., 42 U.S.C. Section 1985(3); 18 U.S.C. Section 1961 et seq. (RICO). MPC also believes that various state criminal laws may have been violated. See, e.g., Pennsylvania RICO statute; conspiracy to violate civil rights under the Illinois Elections Code; failure to register in Illinois as a private detective agency.

It would be against public policy for the Commission to consider complaints based upon such flagrant illegal activities. It is indisputable that the Commission has the authority, and should exercise it, to reject such complaints out of hand.

II. THE COMMISSION SHOULD TAKE IMMEDIATE STEPS TO MAKE CLEAR THAT IT DOES NOT SANCTION THE CONTINUING UNLAWFUL ACTIVITIES OF NRWC

The unlawful activities of NRWC -- if sanctioned in any manner by the government -- also pose substantial due process issues. In light of NRWC's announced intention to continue their infiltration, MPC believes that it is essential that the FEC take steps to disassociate itself from the NRWC's continued unlawful activity. Failure to reject this complaint in light of their announced continued wrongdoing could constitute tacit approval or even encouragement which could amount to state action.

The Commission obviously could not -- and would not -- send its employees to infiltrate the Mondale campaign under false pretenses, receive information from these employees, and then prosecute a complaint based strictly on information so gathered. Yet the information that is the basis for the instant complaints is the fruit of just that type of activity.

If the Commission acts on these complaints, it would do so with full knowledge of the continuing effort of NRWC to defraud

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MPC and intimidate its supporters, and of the avowed intention of NRWC to spend corporate funds to do so. See Statement by Reed Larson, President, National Right to Work Committee, May 18, 1984. Exhibit 1. Plainly, given NRWC's public announcement that its infiltration campaign will continue, acceptance of such evidence encourages their continued use of these tactics.

The right to associate freely for political purposes is of paramount importance under the First Amendment. A $100,000 corporate scheme to infiltrate a political campaign is plainly inconsistent with fundamental constitutional protections. The dangers to the political process of such schemes go far beyond the immediate violations of the rights of Mondale supporters. If organizations like NRWC believe that the Commission will give full consideration -- as a legitimate complaint -- to the products of such activities, infiltration and spying may become the rule rather than the exception. Infiltration of a political association, by self-appointed police, solely to see if information might be uncovered which might constitute some form of wrongdoing, serves no valid public purposes. This sort of vigilante activity cannot be tolerated in any context -- and certainly not where freedom of political association is at stake. The Commission must send a strong signal that these sorts of dirty tricks, which are directly contrary to the purposes and spirit of the FECA, will not be tolerated.

MPC respectfully suggests that there are only two ways to send this message: (1) the Commission should reject these three complaints without any further consideration; (2) alternatively,

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and at an absolute minimum, the Commission should strike every affidavit attached to the complaints -- each of which contain information obtained under false pretenses -- and strike the allegations which are based upon them. This would be a less desirable alternative, because anything short of rejection of these complaints will appear to the public as Commission consideration of the complaints and may be construed as a signal to continue such unconscionable activity.

CONCLUSION

For the foregoing reasons, MPC urges the Commission to strike these complaints.

Respectfully submitted,

David M. Ifshin By CWO
David M. Ifshin
General Counsel

Carolyn U. Oliphant
Carolyn U. Oliphant
Deputy General Counsel

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Statement by Reed Larson
President, National Right to Work Committee
May 18, 1984

I am here this morning to announce findings of the National Right to Work Committee's investigation into the illegal use of compulsory union dues for political purposes. The investigation, launched three months ago today, is the most extensive probe ever conducted of Big Labor's massive political apparatus. We've had private investigators on the hustings since February. Our findings reveal solid evidence of federal election law violations and documentation of forced-dues politicking -- the illegal use of compulsory union dues for partisan political causes.

Let me say that today's announcement is just the first of several public disclosures of evidence gathered in the Committee's continuing probe of Big Labor's role in the 1984 presidential race.

Today, I will release all that I can. But much of the Committee's evidence must be kept under wraps until further documentation can be gathered. To release all of our findings at this time would jeopardize the continuing investigation. I have no doubt that, given Committee findings, Big Labor politicos and Mondale campaign officials would scramble to doctor their records and thus evade charges of election law violations.

As the investigation continues -- and additional evidence can be released -- we will keep you appraised of our findings.

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As for now, you have before you three complaints prepared by the National Right to Work Committee based on our investigation and ready to be filed with the Federal Election Commission. I will summarize these complaints.

First, it is obvious from our investigation that the Mondale campaign -- working in close coordination with organized labor -- has established and governed the so-called Mondale delegate committees as a back-door outlet for political contributions far beyond the legal limit.

These delegate committees exist primarily to launder Big Labor's political contributions and to circumvent federal spending limits.

Second, we have gathered solid, detailed evidence that the so-called "delegate committees" are, in fact, a sham. It is clear from our evidence that these delegate committees are simply branch offices of the Mondale campaign. They are, therefore, limited by law to receive no more than $5,000 in campaign contributions from Big Labor political action committees.

What's more, we have found that these union PACs -- those named as respondents in the complaints -- are affiliated with each other and, therefore, are limited by law to contributions of no more than $5,000, <u>in the aggregate</u>, to the Mondale campaign and its branch offices -- the so-called delegate committees.

Obviously, these limits have been violated in the extreme.

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To cite just one example of this affiliation, I note an AFL-CIO COPE meeting on March 22, 1984. This meeting, chaired by COPE director John Perkins, was attended by 15-16 union agents.

On or within seven days of that meeting, checks totaling $133,440 in union PAC contributions were issued to Mondale "delegate committees."

In brief, our investigation reveals beyond a doubt that these Mondale delegate committees are so closely affiliated with the Mondale campaign as to be indistinguishable from it. Further, we conclude from the evidence presented that these delegate committees have been established as clearing houses to channel union PAC money into the Mondale campaign and circumvent federal election spending limits.

Two additional FEC complaints -- you have copies -- charge the United Steelworkers union, the AFL-CIO Committee on Political Education and the Amalgamated Clothing and Textile Workers union with other violations of federal election laws.

Specifically, we have documented illegal warehousing and distribution of campaign propaganda and illegal communication with the general public. Compounding these violations, union officials have failed to report certain campaign activity either as independent expenditures or as contributions to Mondale.

Finally, it is important to note that the charges in these complaints are substantiated by evidence gathered by

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the National Right to Work Committee and that these complaints are being filed on behalf of working men and women who are forced, through compulsory union dues, to finance political candidates and causes they oppose.

I remind you also that 1) National Right to Work attorneys were successful in the Supreme Court last month, winning clear restrictions on the use of compulsory union dues for non-bargaining expenditures -- such as politics and that 2) the National Right to Work Committee is the driving force behind legislation now pending in Congress to outlaw the use of forced union dues for all political and ideological purposes.

The National Right to Work Committee is out front on the issue of forced-dues politicking, and we intend to stay there. We are getting results across the board -- from the Supreme Court and Congress to local union halls across the country.

Mondale for President
2301 Wisconsin Avenue, N.W.
Washington, D.C. 20007
Telephone: 333-333-1000

MONDALE

June 25, 1984

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

Re: Mur 1704

This letter constitutes the response of the Mondale for President Committee ("MPC" or the "Committee") to the complaint filed by the National Right to Work Committee ("NRWC") and Ralph Martin (Bud) Hettinga, Jr. (together, the "Complainants") on May 18, 1984. The complaint makes the broad allegation that MPC and the Respondent union political action committees (PACs) have "engaged in a concerted effort to circumvent the contribution limitations established by Congress in the Federal Election Campaign Act." It asks the Commission to find that the delegate committees established by Mondale delegates are affiliated with each other and with MPC, and that the union PACs which contributed to delegate committees are affiliated with each other.

Complainants, however, fail to offer any substantive or credible evidence which would support a finding of affiliation under 11 C.F.R. 100.5(g) or a finding that MPC violated the Federal Election Campaign Act of 1971, as amended (FECA). The so-called "evidence" upon which Complainants rely consists of unsubstantiated newspaper articles and of reports of private investigators who obtained information by fraudulently infiltra-

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Paid for by Mondale for President, Inc.

ting the offices of the Mondale campaign and various delegate committees. In the rare instances where facts, as opposed to "impressions" and "beliefs", are presented, they show permissible activities and do not support Complainants' allegations of wrongdoing or conclusions of affiliation. Such speculative and insubstantial evidence should be entitled to no consideration, especially where the evidence was obtained by unlawful means.

The Commission should find no reason to believe that a violation of the Act or regulations has occurred. The delegate committees were established, financed, maintained and controlled by the delegates who formed those committees. The activities of the delegate committees have been in accordance with the letter and spirit of the Act and the regulations.

The issue of affiliation of the delegate committees with each other and with MPC was raised in MUR 1667. In response to that complaint, MPC's position on the issue of affiliation was set forth in detail. MPC's response pointed out that the complaint in Mur 1667 applied the wrong legal standard in its argument on affiliation and failed to show facts that reflected affiliation. This complaint similarly fails in both respects.

The proper legal standards for determining the question of affiliation and the scope of legitimate, permissible delegate committee activities were set out by MPC in its response to MUR 1667. MPC relies on and incorporates herein its response to that MUR. MPC also incorporates that response as to the factual allegations which were raised in the complaint in MUR 1667 and which are presented again in this complaint to infer affiliation

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between MPC and any delegate committee.

1. The Complaint should be dismissed because the evidence which was gathered under false pretenses has no credibility.

This complaint is the third installment in a vicious and systematic scheme to harass MPC. Complainants have publicly stated that they plan to spend at least $100,000 to hire private investigators to infiltrate MPC and the delegate committees. Complainants' agents in every case have acquired their information through unscrupulous and unlawful activities. They lied about their identities and desire to "volunteer" for the Mondale effort, misrepresenting themselves as supporting Mr. Mondale's candidacy with the intent to defraud and mislead MPC.

The evidence procured in this manner is extremely flimsy. First, affidavits of the private investigators hired by Complainants have no credibility since they gained their information under false pretenses. The statements of investigators who admittedly lied to gain access to information are entitled to no weight as evidence. Second, Complainants' investigators, by failing to provide the last names of many of the people alleged to have been at MPC or delegate committee offices, did not adequately identify individuals mentioned in affidavits.1/ Third, Complainants' investigators reached absolutely ridiculous conclusions based on their unsubstantiated "impressions" and "beliefs".

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1/ MPC, in the limited time available, has attempted to identify the individualsmentioned in the complaint where possible. It is impossible, however, for us to wander around Pennsylvania looking e.g., for "Bill...a white man about age 50, about 5'5" tall, rather heavy set, weighing approximately 170 pounds and having salt and pepper hair and a moustache." Attachment C.

For example, they reached the conclusion that individuals were staff members if they were wearing a gold pin in the shape of Pennsylvania with "Mondale" printed on it and were in a good mood. There is no basis given for this conclusion which is illustrative of the quality of the evidence offered by the affidavits.

2. The Complaint should be dismissed because it does not meet standards established in Commission's policy on complaints based on newspaper articles.

Like MUR 1667, a substantial portion of the evidence presented in this complaint is based on inaccurate and undocumented newspaper articles. On November 15, 1979, the Commission adopted a policy set forth in Commission Memorandum No. 663 (the "policy") concerning the opening of compliance actions on the basis of newspaper accounts. Because Complainants have not submitted reliable, credible affidavits, this complaint must meet the standards established by the Commission in its policy on newspaper articles.

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. Policy at 2. Under the regulations, a complaint must set forth a "clear and concise statement of the acts which are alleged to constitute a violation." 11 C.F.R. Section 111.2(b)(2). Where the only statement of facts is that contained in a news report, the Commission noted that an article must be "substantive in its statement of fact." Policy at 3. By contrast, the news accounts upon which this complaint are based are not well-documented or substantial, and do not set forth a sub-

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stantive statement of facts.

In fact, out of eleven so called "news accounts" presented as attachments to the complaint, seven can not even be properly characterized as news articles: six are editorials presenting the conclusions and opinions of their authors, and one is an article which gives the opinions and criticisms of one candidate. These editorial and partisan opinions are clearly insufficient to form the basis of a complaint. The four remaining articles are inaccurate and distort the facts. MPC's response in MUR 1667 explains in detail how instances of legitimate activity were incorrectly reported by the press in a context which insinuated impropriety or illegality. Undocumented accusations and inaccurate factual assertions of the types presented by Complainants are precisely the reasons that the Commission adopted a policy of careful scrutiny of complaints based on newspaper articles. As shown in our response to MUR 1667, a review of the excerpts relied upon by Complainants demonstrates the insufficiency of the complaint.

3. Delegate committees are not affiliated with each other or with MPC.

Complainants' submissions simply fail to establish that either the statutory standard or any of the regulatory indicia of affiliation are present in the relationship between the delegate committees or between MPC and the delegate committees. As shown below, there is no reason to believe that the delegate committees are affiliated with MPC or with each other.

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a. Mondale delegate committees were established, financed, maintained and controlled by delegates.

MPC's response in MUR 1667 fully explains the relevant legal criteria for affiliation and demonstrates that MPC and the delegate committees are not affiliated. For a complete discussion of this issue, MPC incorporates its response in MUR 1667, pp. 19-30.

b. The evidence offered in this complaint does not show affiliation.

Despite Complainant's $100,000 investment in private investigators, a substantial portion of the "evidence" in this complaint merely reiterates many of the allegations made in MUR 1667. MPC's response in MUR 1667 answers the following allegations which are made in the instant complaint: provision of legal assistance to delegate committees (MUR 1667 Response, p. 30); establishment of delegate committees (p. 26-28); former MPC field staff and volunteers subsequently volunteering for delegate committees (p. 28); contributions from one delegate committee to another (p. 29); common handwriting and return address on delegate committee reports (p. 29).

In addition to the substantial overlap with MUR 1667, Complainants utilize newspaper reports to make four new allegations. Complainants allege that: (1) Mr. Mondale reacted to criticism of the delegate committees by writing a letter urging them not to accept PAC contributions and that PAC contributions stopped; (2) delegate committees started to "disband" after Mr. Mondale gave "orders" to do so; (3) the head of the Mondale Delegates D.C. Committee "admitted" that the delegate committee "was the principal finance committee for Mondale in the District of Columbia"; and (4) delegate committees "took the place of" MPC in

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Pennsylvania. See NRWC Complaint at 5, 6. At the outset, MPC notes that, even if true, these allegations standing alone would not justify a finding of affiliation among the delegate committees or between MPC and the delegate committees.

The first two allegations listed above concern Mr. Mondale's political communications with the delegate committees. Mr. Mondale, like any other candidate for public office, has the right to ask his loyal supporters to consider his preferences in their plans to support his candidacy. More important, Mr. Mondale could only make requests of his supporters who formed delegate committees.2/ The delegates and their supporters could not be compelled to abide by Mr. Mondale's or MPC's requests. They were free to pursue their own courses of action irrespective of Mr. Mondale's stated preferences.

Finally, Complainants make allegations concerning the Mondale At-Large Delegate Committee in Philadelphia, PA and the Mondale Delegates Committee in Washington, D.C. These allegations are based on press reports of purported statements made by individuals supporting these delegate committees. MPC cannot explain the isolated and possibly out-of-context statements which these supporters may have made to the press or the public. However, delegate committees in Pennsylvania did not "take the place of" MPC in that state. MPC put substantial resources into Pennsylvania, primarily through media and candidate appearances,

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*/ A copy of the telegram asking delegate committees to terminate is attached. Exhibit 1.

because of the nature of the Pennsylvania primary process. Furthermore, the Mondale Delegates -- D.C. Committee was not the "principal finance committee" for MPC in the District of Columbia. MPC is not even certain what this statement means. The expenditures of the Mondale Delegates -- D.C. Committee were made to further the election of specific Mondale delegates. A reading of the committee's campaign literature makes this perfectly clear. No funds were raised by the D.C. Committee for MPC.

c. Private investigator reports do not provide any facts which would show affiliation.

Complainants assert that the reports of private investigators confirm that MPC "coordinated and controlled" delegate committees. As stated above, these affidavits have little or no credibility because the information contained in them was admittedly obtained under false pretenses. The credibility of the affidavits is further undermined by careful scrutiny. They are replete with inaccuracies and offer no substantiation for Complainant's allegations. Rather, these reports confirm only the predisposed conclusions and conjecture of the private investigators.

Stripped of their insinuations and conclusions, it is obvious that these reports provide no factual support for allegations that delegate committees were established, maintained, controlled, or financed by MPC. In fact, as set forth below, an examination of this so-called "evidence" shows that it fails to support a conclusion of any improper activity on which a legitimate complaint could be based.

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1. Affidavit of Albert J. Brown (Attachment B).

Mr. Brown, allegedly "a private investigator" from Pennsylvania, apparently asked Pennsylvania State Senator Joe Rock how he could "help" the Mondale campaign and was directed to the Mondale At-Large Delegate Committee in Philadelphia. While there on April 9, 10, and 11, he identified three individuals who "seemed" to be supervising activities. The facts presented show that: 1) these individuals wore gold pins in the shape of Pennsylvania with the name "Mondale" imprinted on them; 2) Mr. Brown was told that one individual had taken papers to the 14th floor of the Bellevue Stratford Hotel; 3) one individual commented about "going back to Washington" after the delegate committee office was closed; and 4) two individuals received telephone calls by name.

It is unclear what possible violations of the Act the above listed "facts" are intended to show. The only clue in the affidavits is Mr. Brown's statement that he got the "impression" that one of the individuals he observed at the delegate committee office, Kathy Russell, coordinated activities with MPC offices at the Bellevue Stratford. However, Mr. Brown gives no indication of the factual basis for this impression, other than that she "seemed to receive a number of official calls by name" from unidentified sources, and that she "had 'taken papers up to the suite area.'"

The affidavit infers that those individuals wearing a "gold pin" were MPC staff performing MPC work from the delegate committee headquarters. The affidavit does not explain how Mr. Brown arrived at the conclusion that those wearing a "gold pin" were

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MPC staff. In fact, the pins described in this affidavit were not Mondale staff pins. MPC made expenditures in early 1984 for MPC headquarters staff pins. However, these pins are imprinted with the word "staff" on them and are not in the shape of a map of Pennsylvania. Other than Mr. Brown's "belief" that individuals wearing a "gold pin" were paid versus unpaid workers, no evidence is presented to show that they were being paid at all.

As explained in MPC's response to MUR 1667, some individuals who had been volunteer field workers for MPC subsequently became volunteers for delegate committees and were reimbursed for travel and subsistence. MPC's records indicate that Kathy Russell and Jennifer Collins ("Little Ginny") did, at one time, receive travel and subsistence reimbursements from MPC. However, they received no reimbursements from MPC during the time that Mr. Brown observed them apparently working for a delegate committee. As noted in our previous response, the Commission has never used as an indication of affiliation, the fact that one committee reimbursed the expenses of volunteers formerly reimbursed by another committee. There are no allegations that these individuals were performing anything other than delegate committee work. The man referred to as "Boss Al" in Mr. Brown's affidavit is not sufficiently described for MPC to make any determination as to the identity of this individual.

2. Affidavit of Nicole Chambers/aka Josefina Rivera (Attachment C).

Ms. Chambers/Rivera, identified only as a resident of Philadelphia, was present in a Mondale At-Large Delegate Committee office for two hours on April 9. While there she identified

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four individuals whom she "believed" to be Mondale staff workers. These people were "identified" because:1) three individuals wore a gold pin in the shape of Pennsylvania with the name Mondale imprinted on it; 2) they were in a good mood; 3) they mentioned receiving "Mondale paychecks".

MPC's records indicate that, like the individuals named in Attachment B, an Ann Lewis had, at one time, received travel and subsistence reimbursements from MPC, but was not receiving such payments on April 9. However, the person identified in this affidavit as Ann Lewis does not fit the description of the Ann Lewis who, at one time, worked for MPC. The Ann Lewis who worked at MPC does not fit the age, weight or hair color description of the woman described in the affidavit, nor does the Ann Lewis who at one time worked for MPC wear glasses. Of the remaining individuals mentioned in this affidavit, MPC has no knowledge of who Doris Lassons is and cannot identify "Wanda" or "Bill" from the description given. The conclusion that any identifiable individuals were being paid by MPC while performing delegate committee work is contradicted by MPC records. Additionally, the reported statements by certain individuals described in this affidavit that they had been or would be "<u>invited to go to work</u> for the Mondale campaign" in California contradicts any inference that these individuals were already employed by MPC. Notwithstanding their reported characterization of their paychecks (which, speculatively, could be "Mondale delegate committee" paychecks) and their conclusions about why they had been invited to join the Mondale campaign, MPC's records show that no indivi-

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dual described in this affidavit, or in any of the affidavits was employed or was being reimbursed by MPC at the time that they were performing delegate committee work.

The descriptions of the activities of these individuals do not reveal any activity that is improper. The affidavit states that one individual left a full time job in New York to work "on behalf of" Mondale; another handed out paychecks (source unidentified); another had apparently been working to fill the delegate slate; another was working for pay. None of these acts could be remotely construed as violations.

This affidavit also alleges that the three women described by Ms. Chambers/Rivera stayed at the Bellevue Stratford Hotel and attempts to imply that it was improper for them to stay there because the Stratford also served as the state headquarters for MPC in Pennsylvania. We are at a loss to understand how the allegation that individuals, who volunteered in delegate committee offices, stayed at a particular hotel is relevant to any conceivable violation of the Act.

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3. Affidavit of Albert J. Brown (Attachment D).

This affidavit describes certain campaign materials which were in the At-Large Delegate Committee bathroom. From Mr. Brown's description it appears that there was one box which contained an assortment of Mondale literature from around the country. Four of these items apparently were paid for by MPC, one was a poster apparently printed by AFL-CIO COPE and one was paid for by the 2nd Congressional Delegates for Mondale. The final item is a press release.

Complainants infer that the mere presence of such material

indicates affiliation. Yet they do not allege that 1) the At-Large Committee distributed any of these named materials; 2) MPC paid for delegate committee campaign materials; 3) these materials were not properly reported as expenditures by the appropriate organizations; or 4) the materials themselves in some way violated the Act or the regulations. These materials were not on public display. The only questionable activity here is Mr. Brown's apparent theft of these materials, which may very well have been gathered by a Mondale supporter for his or her own private collection of campaign memorabilia.

4. Affidavit of Nicole Chambers/AKA Josefina Rivera (Attachment E).

This affidavit presents a description of several pieces of campaign literature which Ms. Chambers/Rivera obtained by posing as a volunteer. A delegate committee staff member allegedly gave Ms. Chambers/Rivera the literature as samples of materials which allegedly were to be distributed in Philadelphia later that day. These campaign materials are perfectly proper and legal under the Act. Seven of the nine items were paid for by the At-Large Delegate Committee. One item was paid for by and solicited votes for the 2nd Congressional District Delegates for Mondale which is in the city of Philadelphia. The last item was apparently issued by Pennsylvania AFL-CIO COPE. There is no indication that any of these materials were improperly distributed, carried false disclaimers, or were not properly reported as expenditures.

5. Affidavit of Donald B. Priestly (Attachment F)

In this affidavit, Mr. Priestly, allegedly "an investigator" from Pennsylvania, states that he went to the Upper Darby Demo-

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cratic office. He identifies a Cathy Tutillo as a paid "Mondale staffer" because of the way she "associated" with a Mike Hackman as well as with an unidentified man who came into the office, and because it "seemed" that she was going to Texas after the Pennsylvania election. Mike Hackman, on the other hand, is identified as a "Mondale staff person" because of the way he "associated" with Cathy Tutillo and the "unidentified man" with whom he conversed "rather privately." The affidavit does not explain what is meant by "associating". The unidentified man is "believed" to be a Mondale staffer due to "the manner in which he spoke to Tutillo and Mike Hackman", and because he was treated with deference and he made a phone call from the office. MPC is unable to identify any of these people.

Similarly, Complainants would have the Commission infer improper collaboration between MCP and the unions based on the "evidence" that a man named Randy came to the office and the president of the Delaware County, PA AFL-CIO is also named Randy. MPC has no idea who any of these people are.

The evidence here is clearly of the lowest form. This affidavit is based entirely on innuendo, and insinuation. It contains no substance whatsoever, nor does it allege any violations of the Act.

6. Affidavit of James P. Carino (Attachment G).

Mr. Carino, allegedly "a private investigator" from Pennsylvania, "volunteered" in the Upper Darby Democratic Party office. There he "identified" certain individuals as paid Mondale staffers by the ubiquitous "gold pin" and once so identi-

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fied he got "impressions" from them to verify his initial conclusions.

Mr. Carino identifies a Mike Hackman who apparently claimed that he was a paid Mondale campaign organizer. However, MPC's records show no evidence of any "Mike Hackman" having been employed by MPC at any time nor has MPC's field staff been able to identify the individual described in this affidavit. However, as Mr. Carino admits there is no evidence to indicate the source of Mr. Hackman's employment. The lack of any record of previous association of Mr. Hackman with MPC leads to the inference that any payment he was receiving was from a source other than MPC.

Innuendo is substituted for facts and where facts are presented, they either show no violation or they are twisted into totally baseless inferences. A prime example concerns the description of Mary Baulis who was an alternate delegate. There was a Mondale alternate delegate candidate named Nancy Baulis, so we presume this affidavit refers to her. Complainants would infer that it was improper for delegates to be receiving "union support". However, the facts presented do not indicate any violation of the Act. Similarly, the disclaimer "Labor Donated" does not indicate any improper union activity. It is our understanding that "Labor Donated" is commonly printed on materials when a union printing bug is not used. The bug is used only when the printers are compensated at union scale. When the materials are paid for by a political committee and the services of the printers are on their volunteer time, the phrase "Labor Donated" is used instead. This phrase has no connection whatsoever to the FEC disclaimer which in any event is not required on flyers

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passed out by volunteers. 11 C.F.R. Sec. 110.11 (a)(1).

Mr. Carino seems to find it significant that Mondale supporters were "well organized," "highly motivated," and included high school-aged volunteers. Complaint, Attachment G, paragraph 6. None of these circumstances are unusual in a campaign setting, nor do they set forth any violation of the Act.

7. Affidavit of James P. Carino (Attachment H), Affidavit of Ernest W. Lyles (Attachment I), Affidavit of Richard F. Lawrence (Attachment J).

None of the campaign materials attached as exhibits are in violation of the Act or regulations. Complainants do not allege, nor could they, that these materials are improper in any way. These affidavits and materials seem designed primarily to add to the thickness of the complaint rather than to offer any relevant information.

8. Affidavit of Howard L. Miller, Jr. (Attachment K).

This affidavit of Howard Miller, allegedly "a private investigator" from Virginia, asserts that "volunteer" investigators were sent in Illinois to work on a union operated phone bank, to stuff envelopes and to distribute literature.

The Act expressly permits unions to make partisan communications in connection with a Federal election to members and their families. 11 C.F.R. Sec. 114.3(a). Such communication includes the distribution of material and the establishment and operation of phone banks. 11 C.F.R. Sec. 114.3(c)(1) and (3). The limitation contained in these sections is primarily aimed at restricting the class who may receive the partisan communication. Nothing in the Act or regulations prohibits a non-union volunteer

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from assisting in the distribution of material or in making phone calls, so long as the recipients of the communications paid for by union treasury funds are within the restricted class. The facts alleged do not give any indication that the union material was distributed to the general public or that the phone calls from the phone banks were made to non-union households. There is also nothing in the affidavit which indicates who paid for the phones or the literature. If anything can be gleaned from the affidavit, it appears that there was an intention to distribute some campaign material, at a factory (or factories), where the recipients would be union members.

9. Miscellaneous Allegations

Additionally, Complainants set forth certain other facts to support their conclusions. These facts are too slim to support a conclusion that MPC is affiliated with any delegate committee. Complainants allege that Donald G. Gross who worked for MPC in Illinois transmitted Statements of Organization for three Illinois delegate committees in "Illinois for Mondale" envelopes with, apparently, a cover letter on "Illinois for Mondale" stationary. This allegation is substantially similar to an allegation made in MUR 1667. The simple explanation is likewise similar to our response to this allegation in MUR 1667. MPC offered compliance assistance to some delegate committees where requested. In this case, Donald Gross was a volunteer for the Illinois campaign who offered to help these committees properly comply with the Act's requirements for registering and reporting. The fact that he, or someone on his behalf, addressed the envelopes and sent them in together is irrelevant. To the best of

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our knowledge, each of these delegate committees operated on its own and MPC simply referred a volunteer attorney to them to provide compliance assistance to ensure proper registration and reporting.

A second allegation is that a delegate committee transmitted reimbursement payments for two individuals "through" MPC offices in Washington, D.C. Complainants in this instance reveal once again the shallowness of their "evidence." These payments were not made "through" MPC headquarters at all. The delegate committee's quarterly report shows only that these individuals used MPC headquarters as their mailing address. As with most presidential campaigns, many volunteers are people who travel from state to state and have no fixed address. This appears to have been the case in this instance. Our records show that neither of these individuals were working for or being reimbursed by MPC.

Finally, Complainants allege that an officer of NRWC reached a disconnected delegate committee telephone number in Illinois (312 area code) and was referred to MPC headquarters in Washington, D.C. However, the number which Complainants called (312-368-1984) was not, in fact, a delegate committee office as Complainants allege. It was the number for the Mondale state headquarters in Illinois. This is a perfect example of the untruthfulness of Complainants' allegations. Clearly, Complainants must have known that the number they called was not a delegate committee number, as this information may easily be obtained from the telephone company. Complainants, here and throughout their complaint, deliberately manipulate information

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in an attempt to mislead the Commission.

One by one, the facts presented in Complainants' affidavits purportedly to "confirm" that MPC staff members were controlling delegate committees fail not only to prove a violation of the Act or the regulations but also fail to provide a shred of evidence showing affiliation.

CONCLUSION

For the foregoing reasons, MPC respectfully requests that the Commission find no reason to believe that a violation of the Act has occurred.

Respectfully submitted,

David M. Irshin
General Counsel

Carolyn U. Oliphant
Deputy General Counsel

8504050395 2

MONDALE FOR PRESIDENT, INC.
2201 WISCONSIN AVENUE #100
WASHINGTON DC 20007 25PM

Western Union Mailgram

1-253449U116023 04/25/84 ICS WA16614 WSHA
00150 MLTN VA 04/25/84

Exhibit 1

CONNIE ONOFRE
MONDALE FOR PRESIDENT
2201 WISCONSIN AVE. N.W.
WASHINGTON, D.C. 20007

MEMORANDUM
TO: TREASURERS OF MONDALE DELEGATE COMMITTEES
FROM: WALTER F. MONDALE
DATE: APRIL 25, 1984

TODAY I AM ASKING ALL MONDALE DELEGATE COMMITTEES TO TERMINATE THEIR ACTIVITIES. I URGE YOU TO MOVE AS QUICKLY AS POSSIBLE TO WIND UP THE ACTIVITIES OF YOUR COMMITTEE AND TO SUBMIT A NOTICE OF TERMINATION AND FINAL REPORT TO THE FEDERAL ELECTION COMMISSION. 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.

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.

11468

20:53 EST

MGMCOMP

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TO REPLY BY MAILGRAM MESSAGE, SEE REVERSE SIDE FOR WESTERN UNION'S TOLL - FREE PHONE NUMBERS

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

MONDALE

47

June 25, 1984

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

RE: MURS and 1704

Dear Mr. Steele:

Enclosed is the response of Mondale for President Committee, Inc. ("MPC") to MUR 1704. Also enclosed is a letter relating to MURS and 1704 which urges the Commission to strike all three complaints without further consideration, because of the unscrupulous and unlawful activities engaged in by the complainant, NRWC.

As reflected in the attached memorandum, the reprehensible activities of NRWC in obtaining the information in these complaints went substantially beyond the false pretenses reflected in the affidavits. "Investigators" hired by NRWC obtained unauthorized access to confidential campaign documents and records and even sought the complicity of a TV station in obtaining additional confidential records which are not publicly available.

MPC has requested copies of the tapes or transcripts of the TV interviews with the NRWC "spy" noted in the attachment, but we have not yet received them. MPC believes that these tapes are critical to the Commission's consideration of these matters. For this reason, MPC urges the Commission not to make any determination in these matters until such time as the tapes or transcripts can be reviewed. We believe that review of these materials will materially aid the Commission in reaching a proper final resolution of these matters. MPC will forward them to the Commission immediately upon receipt.

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Thank you for your consideration of this matter.

Sincerely,

David M. Ifshin
General Counsel

Carolyn U. Oliphant
Deputy General Counsel

3504050395S

MEMORANDUM

Attachment 1

March 27, 1984

TO: ALL STATE DIRECTORS
FROM: JIM MARGOLIS, ILLINOIS DIRECTOR
RE: "RIGHT TO WORK" INFILTRATION OF MONDALE CAMPAIGN

During th final few weeks of the Illinois campaign, the NBC affiliate in Chicago was approached by Paul Kreger, a man claiming to be a "spy" in the Mondale organization.

According to NBC, Kreger--a private detective from Virginia--entered the campaign to try to uncover illegal linkages between our campaign and organized labor. The National Right to Work Committee acknowledges that it is spending "six figures" to demonstrate that illegal activities are occuring between the two organizations. The NRW will not confirm or deny that Kreger works for them, however, they do say over twelve "operatives" have been hired for this project. Presumably, the effort was not limited to Illinois alone.

Kreger told NBC that while volunteering for the campaign, he had managed to gain access to files, desks, computer records and financial information. When his review found nothing of substance, he approached NBC with the following proposal: if the station would assist him with getting confidential phone records, he would give them the exclusive story on what was found. NBC instead made his infiltration their story.

If Kreger in fact went through files, computer records, desks and tried to secure phone tapes, it is they, not the Mondale campaign, which was engaged in illegal activities. However, you should be aware that other individuals have very probably entered the campaign on a "volunteer" basis and may be sifting through your records, listening to your conversations or examining your data base.

If you have any questions, please contact me through McWilliams.

Hey, and be careful out there!

vid M. Ifshin
neral Counsel
ndale for President
01 Wisconsin Avenue
ite 100
shington, D.C. 20007

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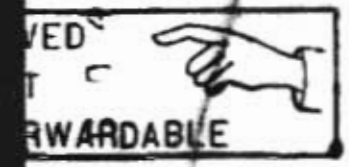
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P 564 479 782
MAIL

WASHINGTON,D.C. 20463

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Alan V. Reuther
Assistant General Counsel
International Union, United Automobile,
Aerospace and Agricultural Implement
Workers of America - UAW
1757 K Street, N.W.
Washington, D.C. 20036

Postage and Fees Paid
Federal Election Commission



CERTIFIED

John E. McAuliffe, Treasurer
27th Congressional District
Delegates For Mondale
236 Erie Boulevard East
Syracuse, NY 13202

943609

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 21, 1984

William Oldaker, Esquire
Epstein Becker Borsody & Green, P.C.
1140 19th St., N.W.
Washington, D.C. 20036

Re: MUR 1704
International Union Machinists and Aerospace Workers and Machinists Non-Partisan Political League
Eugene Glover, treasurer

Dear Mr. Oldaker:

This responds to your letter of June 15, 1984, wherein you requested an extension of time to file a response to the complaint in the above-captioned matter. The Commission, on June 20, 1984, considered the request and voted not to grant an extension of time.

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at 523-4143.

Sincerely,

Charles N. Steele (sm)

Charles N. Steele
General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 21, 1984

William Oldaker, Esquire
Epstein Becker Borsody & Green, P.C.
1140 19th St., N.W.
Washington, D.C. 20036

Re: MUR 1704
American Federation of Teachers
American Federation of Teachers COPE
Robert Porter, treasurer

Dear Mr. Oldaker:

This responds to your letter of June 15, 1984, wherein you requested an extension of time to file a response to the complaint in the above-captioned matter. The Commission, on June 20, 1984, considered the request and voted not to grant an extension of time.

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at 523-4143.

Sincerely,

Charles N. Steele

Charles N. Steele
General Counsel

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NL.

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

William Oldaker, Esquire
Epstein Becker Borsody & Green, P.C.
1140 19th St., N.W.
Washington, D.C. 20036

Re: MUR 1704
International Union Machinists and Aerospace Workers and Machinists Non-Partisan Political League
Eugene Glover, treasurer

Dear Mr. Oldaker:

This responds to your letter of June 15, 1984, wherein you requested an extension of time to file a response to the complaint in the above-captioned matter. The Commission, on June 20, 1984, considered the request and voted not to grant an extension of time.

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at 523-4143.

Sincerely,

Charles N. Steele (SM)
Charles N. Steele
General Counsel

8504039052

NL..

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

William Oldaker, Esquire
Epstein Becker Borsody & Green, P.C.
1140 19th St., N.W.
Washington, D.C. 20036

Re: MUR 1704
American Federation of Teachers
American Federation of Teachers COPE
Robert Porter, treasurer

Dear Mr. Oldaker:

This responds to your letter of June 15, 1984, wherein you requested an extension of time to file a response to the complaint in the above-captioned matter. The Commission, on June 20, 1984, considered the request and voted not to grant an extension of time.

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at 523-4143.

Sincerely,

Charles N. Steele GM

Charles N. Steele
General Counsel

8504030963

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
American Federation of Teachers Committee on Political Education (AFT COPE) and Robert Porter, as treasurer	)	MUR 1704

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission , do hereby certify that on June 20, 1984, the Commission decided by a vote of 5-1 to take the following actions in the above-captioned matter:

1. Deny the request for an extension of time to respond to the complaint in MUR 1704 submitted by American Federation of Teachers Committee on Political Education (AFT COPE) and Robert Porter, as treasurer.

2. Deny the request for an extension of time to respond to the complaint in MUR 1704 submitted by the Machinists Non Partisan Political League and Eugene Glover, as treasurer.

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

Attest:

6-20-84
Date

Marjorie W. Emmons
Secretary of the Commission

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SENSITIVE

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

84 JUN 19 P2: 01

June 19, 1984

MEMORANDUM TO: The Commission

FROM: Charles N. Steele CNS/lmw
General Counsel

SUBJECT: Request for Extension of Time in
MUR 1704
AFT COPE, Machinists Non Partisan
Political League

The Office of the General Counsel has received two additional requests for extensions of time from respondents in MUR 1704. This Office has reviewed the requests and does not believe, in light of the urgency of this matter, that the requested extensions warrant approval by the Commission. We note that the extension request for a 5 day extension from the Machinists Non Partisan Political League is their second request. The Commission denied their first request for a 15 day extension on June 15, 1984.

Recommendation

1. Deny the request for an extension of time to respond to the complaint in MUR 1704 submitted by American Federation of Teachers Committee on Political Education (AFT COPE) and Robert Porter, as treasurer.

2. Deny the request for an extension of time to respond to the complaint in MUR 1704 submitted by the Machinists Non Partisan Political League and Eugene Glover, as treasurer.

Attachments
1-2 Requests for extensions
3-4 Proposed letters

8504039653

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GILBERT J. GINSBURG
RONALD M. GREEN
WILLIAM A. HELVESTINE*
GREGORY S. HRESTANO*
ROBERT L. JAUVTIS*
WILLIAM C. KOPIT
DAVID C. MAIN, JR.
FRANK C. MORRIS, JR.
JAMES P. MULAEEN*
WILLIAM C. OLDAKER
JOSEPH P. PARKER**
SUSAN SCHENKEL-SAVITT*
FRANKLIN R. SEARS**
HARRY M. TUNK*
KENNETH G. WEGBSTEIN

DANIEL G. ABRAHAMS
BRIAN A. BANNON
AMY J. BEECH*
PHILIP M. BERKOWITZ*
CAROL S. BERNSTEIN*
STEPHEN S. BOOCHEVER
PAMELA S. BOUEY*
PAUL BROWNSTEIN*
DALE E. CALLENDER*

VICTORIA E. DUGANOV*
ROBERT A. DOLINSKY*
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LINDA S. HERSHEY*
LESLIE J. HERMAN
WAYNE G. KEUP
SANDRA R. KING
BETTYE S. KITCH**
LAWRENCE M. KOLTUN
DENNIS A. LALLI*
DAVID M. LARRY
STEPHEN R. MILLS*
ROBERT J. MOSES
JOY D. OBERMAN*
INA A. PLOTSKY*
RICHARD J. REINSTEIN*
ROBERT D. REIF
ARTHUR R. ROSE
LYNN E. SHAPIRO
RICHARD L. STEER*
PETER M. STEIN
LINDA V. THAD*
CARRIE VILLANT
JEFFREY H. VILLET
PATRICIA WESTERHAND*
KATHLEEN M. WILLIAMS
MICHAEL L. ZIEGLER*

EDWIN M. EPSTEIN
KENNETH HARTENBIST*
ARNOLD R. LEVY*
MALCOLM MASON***
STUART GRUNER, M.D.*
DONALD PARTLAND*
FREDERICK E. SMITHLINE*
J. ROBERT STEELMAN
SIDNEY TORRES*

*D.C. BAR ONLY
**ADMITTED TEXAS ONLY
***ADMITTED IN ENGLAND AND WALES ALSO

June 15, 1984

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

Re: FEC MUR 1704

Dear Mr. Steele:

We are writing to you to request an extension of time from June 19, 1984 to June 25, 1984 for respondent American Federation of Teachers Committee on Political Education ("AFT COPE") to reply to the complaint filed in the above-noted matter.

The respondent received the complaint herein on June 4, 1984. The length of the complaint (26 pages with hundreds of pages of attachments), coupled with previous commitments of this office in other matters, renders it virtually impossible for us to prepare a proper reply within the normal 15-day reply period.

Accordingly, we hereby request an extension of time in which to file the reply of respondent AFT COPE from June 19, 1984 until June 25, 1984.

Sincerely,

William C. Oldaker
Counsel for Respondent
AFT COPE

WO/LK:ses
cc: Stephen Mims

Attachment 1

8504039 6

EPSTEIN BECKER BORSODY & GREEN, P.C.
ATTORNEYS AT LAW
1140 19TH STREET, N.W.
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JOSEPH P. PARKER**
SUSAN DONOVAN-SAVITT*
FRANKLIN R. SEARS**
RICHARD S. VERNON

BRIAN A. DAWSON
AMY J. GEEDY*
PHILIP H. GERSHOWITZ*
CAROL S. GERSHOWITZ*
DALE E. GALLENGER*
ROBERT A. DOLINKO*
KAREN DONNE EATON
JACK A. GIFFORMAN*
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WAYNE A. KEAN*
LIDA E. KING
SANDRA R. KING
DENNIS A. LALLI*
DAVID H. LARRY
JUDAH LIPSCHITZ
DAVID S. MARX, JR.
STEPHEN R. MILLS*
ROBERT J. MOSES
JOY S. OSOFSKY*
DONALD S. PICARD
IRA A. PLOTSKY*
KATHERINE HORROCKS-REDWINE
RICHARD J. ROSOTEN*
ROBERT S. ROSF
DONALD S. SHALLMOUS
LYNN E. SHAPIRO
RICHARD L. STEER*
LINDA Y. THANG*
KENNETH S. WEGSTEIN
RANDALL G. WELLS*
TERASA M. WHORERTY
KATHLEEN M. WILLIAMS
MICHAEL L. ZIEGLER*

STEVEN M. BARGEY**
EDWIN N. EPSTEIN
ARNOLD R. LEVY*
JAMES P. MULASEN
WILLIAM C. OLDAKER
DONALD PARTLAND*
FREDERICK C. SMITHLINE*
SIDNEY TOGMES*
OF COUNSEL

*NOT ADMITTED WASHINGTON
**ADMITTED TEXAS ONLY

*D.C. NEW YORK AND WASHINGTON, D.C. ONLY

June 15, 1984

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

Re: FEC MUR 1704

Dear Mr. Steele:

We are writing to you to request an extension of time from June 19, 1984 to June 25, 1984 for respondent Machinists Non-Partisan Political League to reply to the complaint filed in the above-noted matter.

The respondent received the complaint herein on June 4, 1984. The length of the complaint (26 pages with hundreds of pages of attachments), coupled with previous commitments of this office in other matters, renders it virtually impossible for us to prepare a proper reply within the normal 15-day reply period.

Accordingly, we hereby request an extension of time in which to file the reply of respondent Machinists Non-Partisan Political League from June 19, 1984 until June 25, 1984.

Sincerely,

William C. Oldaker
Counsel for Respondent
Machinists Non-Partisan Political League

WO/LK:ses
cc: Stephen Mims

Attachment 2

8504039067

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES N. STEELE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/JODY C. RANSOM

DATE: JUNE 15, 1984

SUBJECT: MUR 1704 - Letter from the Pennsylvania 18th Congressional District Delegates for Mondale, Memorandum to the Commission dated June 13, 1984

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Since the memorandum regarding the letter from the Pennsylvania 18th Congressional District Delegates contained no recommendations, there is a question as to why the memorandum was circulated on a tally vote basis. However, we followed your instructions and the results are as follows:

3 approvals - Commissioners Aikens, Elliott and McGarry

1 objection for the record - Commissioner McDonald

2 "no-votes" - Commissioners Reiche and Harris

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES N. STEELE
GENERAL COUNSEL

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

DATE: JUNE 14, 1984

SUBJECT: COMMENTS RE: MUR 1704 - LETTER FROM THE PENNSYLVANIA 18th CONGRESSIONAL DISTRICT DELEGATES FOR MONDALE - MEMORANDUM TO THE COMMISSION dated June 13, 1984

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

Attachment:
copy of vote sheet

8504030969

FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

MEMORANDUM TO: CHARLES N. STEELE
GENERAL COUNSEL

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

DATE: JUNE 14, 1984

SUBJECT: COMMENTS RE: MUR 1704 - LETTER FROM THE PENNSYLVANIA 18th CONGRESSIONAL DISTRICT DELEGATES FOR MONDALE - MEMORANDUM TO THE COMMISSION dated June 13, 1984

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

Attachment:
copy of vote sheet

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RECEIVED
OFFICE OF THE
COMMISSION SECRETARY
84 JUN 13 P3: 56

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 13, 1984

MEMORANDUM TO: The Commission

SENSITIVE

FROM: Charles N. Steele
General Counsel

SUBJECT: Letter from the Pennsylvania 18th Congressional District Delegates for Mondale in MUR 1704

The Office of the General Counsel received a notice from the Pennsylvania 18th Congressional District Delegates for Mondale on June 1, 1984. The respondent indicated that he did not receive a copy of the complaint with the other materials mailed in MUR 1704. The Office of the General Counsel has, accordingly, sent an additional copy of the complaint on June 8, 1984. In a cover letter this Office noted that the response would be due within 15 days of receipt of the additional copy of the complaint.

No Recommendation

Attachments

1. Letter from the Pennsylvania 18th Congressional District Delegates for Mondale.

2. Letter sent by the Office of the General Counsel on June 8, 1984.

3504030971

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 8, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Arthur Rooney, II
Berkman Ruslander Pohl
Lieber and Engel
1 Oxford Center, 40th Floor
Pittsburgh, Pennsylvania 15219

Re: MUR 1704
Pennsylvania 18th Congressional
District Delegates for Mondale
Arthur Rooney, II, treasurer

Dear Mr. Rooney:

This responds to your letter of June 1, 1984, wherein you stated that you did not receive a copy of the complaint in connection with the notification letter in MUR 1704. We have enclosed an additional copy of the complaint for your review. The due date for your response to the complaint in the above-captioned matter will be 15 days from the receipt of this letter.

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202)523-4143.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosure

8504050397 2

RECEIVED AT THE FEC
GC#3508

BERKMAN RUSLANDER
POHL LIEBER & ENGEL

40th Floor, One Oxford Centre
Pittsburgh, Pennsylvania 15219-6498

ARTHUR J. ROONEY, II
(412) 392-2130

June 1, 1984

84 JUN 7 AM 9:47

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.

8504033973

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 1704
International Union of Bricklayers and Allied Craftsmen, et. al.	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on June 15, 1984, the Commission decided by a vote of 5-1 to take the following actions in MUR 1704:

1. Deny the request for an extension of time to respond to the complaint in MUR 1704 submitted by the International Union of Bricklayers and Allied Craftsmen, its political action committee and Edward M. Bellucci, as treasurer.

2. Deny the request for an extension of time to respond to the complaint in MUR 1704 submitted by Amalgamated Clothing and Textile Workers Union, its political action committee and John Fox, as treasurer.

3. Deny the request for an extension of time to respond to the complaint in MUR 1704 submitted by International Union, Machinists and Aerospace Workers, its political action committee and Eugene Glover, as treasurer.

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

Attest:

6-15-84
Date

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

8504053971

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 18, 1984

Sarah Fox, Esquire
International Union of Bricklayers
and Allied Craftsmen
815 - 15th Street, N.W.
Washington, D.C. 20005

Re: MUR 1704
International Union of Bricklayers
and Allied Craftsmen
Union Bricklayers and Allied
Craftsmen PAC
Edward M. Bellucci, treasurer

Dear Ms. Fox:

This responds to your letter of June 6, 1984, wherein you requested an extension of time to file a response to the complaint in the above-captioned matter. The Commission, on June 15, 1984, considered your request and voted not to grant an extension of time.

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at 523-4143.

Sincerely,

Charles N. Steele
General Counsel

8504030397 5

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 18, 1984

Joan Ruby, Esquire
Amalgamated Clothing and Textile
Workers Union
15 Union Square
New York, New York

Re: MUR 1704
Amalgamated Clothing and Textile
Workers Union
Amalgamated Clothing and Textile
Workers Union-PAC
John Fox, treasurer

Dear Ms. Ruby:

This responds to your letter of June 5, 1984, wherein you requested an extension of time to file a response to the complaint in the above-captioned matter. The Commission, on June 15, 1984, considered your request and voted not to grant an extension of time.

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202)523-4143.

Sincerely,

Charles N. Steele
General Counsel

8504039376

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 18, 1984

Joseph P. Manners, General Counsel
International Union, Machinists and
Aerospace Workers
1300 Connecticut Avenue, N.W.
Washington, D.C. 20036

Re: MUR 1704
International Union, Machinists and
Aerospace Workers
Machinists Non-Partisan Political
League
Eugene Glover, treasurer

Dear Mr. Manners:

This responds to your letter of June 6, 1984, wherein you requested an extension of time to file a response to the complaint in the above-captioned matter. The Commission, on June 15, 1984, considered your request and voted not to grant an extension of time.

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at 523-4143.

Sincerely,

Charles N. Steele (attorney)

Charles N. Steele
General Counsel

9504039977

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

84 JUN 13 P3: 55

June 13, 1984

SENSITIVE

MEMORANDUM TO: The Commission

FROM: Charles N. Steele
General Counsel

SUBJECT: Requests for Extension of Time in MUR 1704

The Office of the General Counsel has received three additional requests for extensions of time from respondents in MUR 1704. This Office has reviewed the requests and does not believe, in light of the urgency of this matter, that the requested extensions warrant approval by the Commission.

Recommendations

1. Deny the request for an extension of time to respond to the complaint in MUR 1704 submitted by the International Union of Bricklayers and Allied Craftsmen, its political action committee and Edward M. Bellucci, as treasurer.

2. Deny the request for an extension of time to respond to the complaint in MUR 1704 submitted by Amalgamated Clothing and Textile Workers Union, its political action committee and John Fox, as treasurer.

3. Deny the request for an extension of time to respond to the complaint in MUR 1704 submitted by International Union, Machinists and Aerospace Workers, its political action committee and Eugene Glover, as treasurer.

Attachments
1-3 Requests for extensions
4-6 Proposed letters

3514053973

International Union of
Bricklayers & Allied Craftsmen
815 Fifteenth Street, N.W., Washington, D.C. 20005 • Phone 202/ 783-3788

RECEIVED BY THE FEC
MUR #1704
84 JUN 8 AM 10:40



Office of the President

June 6, 1984

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

RE: MUR 1704

Dear Mr. Steele:

Enclosed please find the notice signed by Edward M. Bellucci, secretary-treasurer of the International Union of Bricklayers and Allied Craftsmen and treasurer of the Union's political action committee, designating the undersigned as counsel in the above-captioned matter.

Respondent received the complaint on June 1, 1984. Due to the length of the complaint and the complexity of the matters alleged, Respondent respectfully requests a 15-day extension of time to July 1, 1984 in which to respond to the complaint. The undersigned is the only staff attorney for the International Union and serves in that capacity on a three-day-a-week basis. Because of the large volume of internal administrative matters that must be attended to and my responsibilities in overseeing and coordinating ongoing litigation by and against the International Union in various fora, it would be extremely difficult to prepare an adequate response to the complaint within the period specified.

Respectfully submitted,

Sarah Fox

Sarah Fox
Staff Attorney

SF/kyp
enclosure

8504030972

Attachment 1
Page 1

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1704

NAME OF COUNSEL: Sarah Fox

ADDRESS: Bricklayers & Allied Craftsmen
815 Fifteenth Street, N.W.
Washington, D.C. 20005

TELEPHONE: (202) 783-3788

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

Edward M. Bellucci
Signature

RESPONDENT'S NAME: Edward M. Bellucci

ADDRESS: Bricklayers & Allied Craftsmen
815 Fifteenth Street, N.W.
Washington, D.C. 20005

HOME PHONE: (301) 299-8069

BUSINESS PHONE: (202) 783-3788

Attachment 1
Page 2

AMALGAMATED CLOTHING AND TEXTILE WORKERS UNION

MURRAY H. FINLEY
President

JACK SHEINKMAN
Secretary-Treasurer

SCOTT HOVEMAN
Executive Vice President

AFL-CIO, CLC

15 UNION SQUARE • NEW YORK, N.Y. 10003
(212) 242-0700

RECEIVED BY THE FEC
84 JUN 6 A10:40
FEC #3540

June 5, 1984

84 JUN 8 P1:12

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

Re: MUR 1704

Dear Mr. Mims,

Enclosed please find a Statement of Designation of Counsel in MUR 1704 for Respondent Amalgamated Clothing and Textile Workers Union-PAC, wherein the undersigned is included in the designated counsel.

On behalf of Respondent Amalgamated Clothing and Textile Workers Union-PAC, I request an extension of time to gather the information necessary to submit a response.

A copy of MUR 1704 was received in this office on June 5, 1984. All of the people with relevant information on the allegations in the Complaint will be unavailable during the two week period from June 4, 1984 through June 15, 1984. The General Executive Board of the Amalgamated Clothing and Textile Workers Union ("ACTWU") is meeting in Florida the week of June 4th. The Triennial International Convention of ACTWU will be held in Florida the following week. Additionally, I will be out of the

8504039081

VICE PRESIDENTS

JOHN ALLERUZZO
SAMUEL J. AZZINARO
KILMER CABAN
LES CALDER
FRANK CALECA
CHARLES BUD CLARK
ED CLARK
JEAN MARC COUTURE
OLGA DIAZ
JAMES DILLON
HENRY DROPKIN
BRUCE DUNTON
GARRY FERRARIS
JOHN FOX
SAM FOX
ANGELO G. GEORGIAN
HARRY GORDON
MARION E. GROCE
NICHOLAS GYORY
WILLIAM HALL
JOSEPH HUGHES
JAMES JACKSON
JAMES A. JOHNSON
ARTHUR LOEVY
RICHARD MacFADYEN
JOYCE D. MILLER
VERA MILLER
MURRAY MORENO
FRANK NICHOLAS JR.
CARMEN PAPALE
BRUCE RAYNOR
CHARLES SALLEE
LEON SPITZER
PETER J. SWOBODA
CECIL TOPPIN
JIM WALRAVEN

office during the week of June 18th. For the above-stated reasons, I respectfully request an extension of time to submit a response until July 11, 1984.

Thank you for your consideration of this request.

Very truly yours,

Joan Ruby

Joan Ruby
Assistant General Counsel

JR/vk

cc: Arthur M. Goldberg
George A. Kirschenbaum
Barbara J. Carey
John Fox

Certified Mail No. 748985

Attachment 2
Page 2

9504030393 2

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1704

NAME OF COUNSEL: Arthur M. Goldberg, George A. Kirschenbaum
Joan Ruby, Barbara Carey

ADDRESS: ACTWU
15 Union Square West
New York, N.Y. 10003

TELEPHONE: 212 242-0700

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

Signature

RESPONDENT'S NAME: Amalgamated Clothing & Textile Workers Union-PAC

ADDRESS: 15 Union Square West
New York, N.Y. 10003

HOME PHONE:

BUSINESS PHONE: 212 242-0700

Attachment 2
Page 3

RECEIVED AT THE FEC

84 JUN 6 P12:10

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1704

NAME OF COUNSEL: Joseph P. Manners

ADDRESS: 1300 Connecticut Avenue, N.W.
Washington, D.C. 20036

TELEPHONE: 202-857-5250

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

Eugene Glover
Signature

RESPONDENT'S NAME: Machinists Non-Partisan Political League

ADDRESS: 1300 Connecticut Avenue, N.W.
Washington, D.C. 20036

HOME PHONE:

BUSINESS PHONE: 202-857-5200

Attachment 3
Page 1

8504053981

BEFORE THE
FEDERAL ELECTION COMMISSION

THE NATIONAL RIGHT TO WORK COMMITTEE, et al.,	)	MUR 1704
Complainants,	)	
v.	)	
WALTER F. MONDALE, et al.,	)	
Respondents.	)	

RESPONDENT'S, MACHINISTS NON-PARTISAN POLITICAL LEAGUE, REQUEST FOR EXTENSION OF TIME

Comes now the Respondent, Machinists Non-Partisan Political League, by and through its undersigned attorney and respectfully requests a 20-day extension of time for an opportunity to demonstrate that no action be taken against the Machinists Non-Partisan Political League (MNPL) and for reasons thereto sets forth as follows:

1. Mr. Eugene Glover, the Treasurer of MNPL, as of Saturday, June 2, 1984, departed for the West Coast and will not be returning to Washington, D.C. until on or about June 18 or 19, 1984.

2. Mr. Glover was served by certified mail on or about 3:30 p.m. on June 1, 1984, just as he was leaving the office.

3. The undersigned counsel was furnished a copy of the Complaint together with a cover letter and attachments at approximately 4:30 p.m. on Friday, June 1, and has had no opportunity to discuss the factual situation with Mr. Glover whatsoever.

Attachment 3
Page 2

4. Bringing together of any and all information relating to the Complaint will require a time-consuming effort from individual or individuals who, at this time, remain unknown to the undersigned counsel.

5. It appears from a cursory reading of the Complaint that a real opportunity to demonstrate that no action should be taken against this union exists and that being furnished a proper opportunity to so respond can alleviate a lot of time and unnecessary governmental involvement.

WHEREFORE, because of the aforesaid, it is respectfully requested that a continuance be granted to afford the MNPL time to demonstrate in writing that no action be taken against it or the International Association of Machinists and Aerospace Workers, and that this continuance be granted to and including July 6, 1984.

Respectfully submitted,

Machinists Non-Partisan Political League, International Association of Machinists and Aerospace Workers

By: _____
Joseph P. Manners
GENERAL COUNSEL

I hereby certify that on this 4th day of June, 1984, I have mailed the original and five copies of this Motion for Extension of Time to Stephen Mims, c/o the Federal Election Commission, 1325 K Street, N.W., Washington, D.C. 20463, by certified mail, return receipt requested.

_____

Attachment 3
Page 3

8504053935

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Sarah Fox, Esquire
International Union of Bricklayers
and Allied Craftsmen
815 - 15th Street, N.W.
Washington, D.C. 20005

Re: MUR 1704
International Union of Bricklayers
and Allied Craftsmen
Union Bricklayers and Allied
Craftsmen PAC
Edward M. Bellucci, treasurer

Dear Ms. Fox:

This responds to your letter of June 6, 1984, wherein you requested an extension of time to file a response to the complaint in the above-captioned matter. The Commission, on June , 1984, considered your request and voted not to grant an extension of time.

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Attachment 4

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Joan Ruby, Esquire
Amalgamated Clothing and Textile
Workers Union
15 Union Square
New York, New York

Re: MUR 1704
Amalgamated Clothing and Textile
Workers Union
Amalgamated Clothing and Textile
Workers Union-PAC
John Fox, treasurer

Dear Ms. Ruby:

This responds to your letter of June 5, 1984, wherein you requested an extension of time to file a response to the complaint in the above-captioned matter. The Commission, on June , 1984, considered your request and voted not to grant an extension of time.

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202)523-4143.

Sincerely,

Charles N. Steele
General Counsel

8504039037

Attachment 5

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Joseph P. Manners, General Counsel
International Union, Machinists and
Aerospace Workers
1300 Connecticut Avenue, N.W.
Washington, D.C. 20036

Re: MUR 1704
International Union, Machinists and
Aerospace Workers
Machinists Non-Partisan Political
League
Eugene Glover, treasurer

Dear Mr. Manners:

This responds to your letter of June 6, 1984, wherein you requested an extension of time to file a response to the complaint in the above-captioned matter. The Commission, on June , 1984, considered your request and voted not to grant an extension of time.

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at 523-4143.

Sincerely,

Charles N. Steele
General Counsel

8504023938

Attachment 6

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 18, 1984

Lester Asher, Esquire
Asher, Pavalon, Gitler
Greenfield and Segall, LTD.
2 North LaSalle Street
Chicago, Illinois 60602

Re: MUR 1704
Service Employees International Union
Service Employees International
Union COPE PCC
Richard Cordtz, treasurer

Dear Mr. Asher:

This responds to your letter of June 8, 1984, wherein you requested an extension of time to file a response to the complaint in the above-captioned matter. The Commission, on June 15, 1984, considered your request and voted not to grant an extension of time.

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at 523-4143.

Sincerely,

Charles N. Steele
General Counsel

8504050399 7

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 1704
Services Employees International Union	)	
SEIU COPE PCC	)	
Richard Cordtz, Treasurer	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on June 15, 1984, the Commission decided by a vote of 5-1 to deny the request for an extension of time to respond to the complaint in MUR 1704 submitted by the Service Employees International Union, its political action committee and Richard Cordtz, as treasurer.

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

Attest:

6-15-84
Date

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

Received in Office of Commission Secretary: 6-14-84, 11:14
Circulated on 24 hour tally basis: 6-14-84, 1:00

8504030990

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

84 JUN 14 AM: 14

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 14, 1984

SENSITIVE

MEMORANDUM TO: The Commission

FROM: Charles N. Steele
General Counsel

SUBJECT: Request for Extension of Time in MUR 1704 Services Employees International Union, SEIU COPE PCC and Richard Cordtz, treasurer

The Office of the General Counsel has received an additional request for an extension of time from a respondent in MUR 1704. This Office has reviewed the request and does not believe, in light of the urgency of this matter, that the requested extension warrants approval by the Commission.

Recommendation

Deny the request for an extension of time to respond to the complaint in MUR 1704 submitted by the Service Employees International Union, its political action committee and Richard Cordtz, as treasurer.

Attachments
1. Request for extension
2. Proposed letter

8 3 0 3 9 6 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Sarah Fox, Esquire
International Union of Bricklayers
and Allied Craftsmen
815 - 15th Street, N.W.
Washington, D.C. 20005

Re: MUR 1704
International Union of Bricklayers
and Allied Craftsmen
Union Bricklayers and Allied
Craftsmen PAC
Edward M. Bellucci, treasurer

Dear Ms. Fox:

This responds to your letter of June 6, 1984, wherein you requested an extension of time to file a response to the complaint in the above-captioned matter. The Commission, on June , 1984, considered your request and voted not to grant an extension of time.

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at 523-4143.

Sincerely,

Charles N. Steele
General Counsel

8504050399 2

Attachment 4

LAW OFFICES

ASHER, PAVALON, GITTLER, GREENFIELD AND SEGALL, LTD.

TWO NORTH LA SALLE STREET

CHICAGO, ILLINOIS 60602

(312) 263-1500

LESTER ASHER

June 8, 1984

Mr. Stephen Mims
Federal Election Commission
Washington, D. C. 20463

Re: MUR 1704

Dear Mr. Mims:

Please be advised that the undersigned is Counsel for Service Employees International Union and for Service Employees International Union COPE PCC. As such, I have been requested to respond to the Complaint filed under the above number.

At the present time, John Sweeney, International President, is out of the country on an ILO assignment and he will not return until the beginning of July. The undersigned has commitments relating to the preparation of briefs, negotiations and other matters, which also make it impossible to respond to the Complaint within the 15-day time period prescribed.

It is accordingly requested that an extension of time be granted to and including July 10, 1984, for the purpose of responding to the Complaint. An executed copy of the Statement of Designation of Counsel is being furnished to you together with this letter.

Very truly yours,

Lester Asher

Lester Asher

LA:rlr
encl.

Attachment 1

8504033993

10:12 AM

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Lester Asher, Esquire
Asher, Pavalon, Gitler
Greenfield and Segall, LTD.
2 North LaSalle Street
Chicago, Illinois 60602

Re: MUR 1704
Service Employees International Union
Service Employees International
Union COPE PCC
Richard Cordtz, treasurer

Dear Mr. Asher:

This responds to your letter of June 8, 1984, wherein you requested an extension of time to file a response to the complaint in the above-captioned matter. The Commission, on June , 1984, considered your request and voted not to grant an extension of time.

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at 523-4143.

Sincerely,

Charles N. Steele
General Counsel

8504050399 1

Attachment 2

Ken

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 15, 1984

Carolyn U. Oliphant, Esq.
Mondale for President, Inc.
2201 Wisconsin Avenue, NW
Washington, D.C. 20007

Re: MUR 1704
Mondale for President, Inc.
Michael S. Berman, as treasurer

Dear Ms. Oliphant:

This responds to your letter of June 12, 1984, wherein you requested an extension of time of 5 days in which to file a response to the complaint in the above-captioned matter. On June 15, 1984, the Commission considered your request and voted to approve the extension. Your response is now due on June 25, 1984.

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at 523-4143.

Sincerely,

Charles N. Steele
General Counsel

8504030995

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 1704
Request for Extension of Time from Mondale for President, Inc. and Michael S. Berman, as treasurer	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on June 15, 1984, the Commission decided by a vote of 6-0 to take the following actions in MUR 1704 as set forth in the General Counsel's Errata dated June 14, 1984:

1. Grant a 5 day extension of time in which to respond to the complaint in MUR 1704 submitted by Mondale for President, Inc. and Michael S. Berman, as treasurer.

2. Send the letter attached to the General Counsel's Memorandum to the Commission dated June 14, 1984.

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

Attest:

6-15-84
Date

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

Memorandum received in Office of Commission Secretary: 6-14-84, 11:1
Memorandum circulated on 24 hour tally basis: 6-14-84, 1:00
Errata received in Office of Commission Secretary: 6-14-84, 3:13
Errata circulated on 24 hour tally basis: 6-14-84, 4:00

8504050399 6

SENSITIVE

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

84 JUN 14 P3: 18

June 14, 1984

MEMORANDUM

TO: The Commission

FROM: Charles N. Steele
General Counsel

SUBJECT: Errata to Request for Extension of Time from Mondale for President, Inc. and Michael S. Berman, as treasurer, in MUR 1704

The recommendation in the Mondale request for extension should read:

Grant a 5 day extension of time in which to respond to the complaint in MUR 1704 submitted by Mondale for President, Inc. and Michael S. Berman, as treasurer, and send the attached letter.

The letter should read:

This responds to your letter of June 12, 1984, wherein you requested an extension of time in which to file a response in the above-captioned matter. *** Your response is now due on June 25, 1984.

8504030997

cc: Bonham
Thims
Lorne
Ludaway
Gan

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES N. STEELE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/JODY C. RANSOM JCR

DATE: JUNE 15, 1984

SUBJECT: COMMENTS RE: MUR 1704 Request for Extension of Time: Mondale for President Inc., Michael S. Berman, Treasurer

Attached is a copy of Commissioner Harris' vote sheet with comments regarding his vote in the above-captioned matter.

Attachment:
copy of vote sheet

8504050399 8

cc: Bonham
Mims
Lerner
Ludaway
Garr

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES N. STEELE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/JODY C. RANSOM

DATE: JUNE 15, 1984

SUBJECT: COMMENTS RE: MUR 1704 Request for Extension of Time: Mondale for President Inc., Michael S. Berman, Treasurer

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

Attachment:
copy of vote sheet

8504030399 9

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

84 JUN 14 AM: 14

June 14, 1984

SENSITIVE

MEMORANDUM TO: The Commission

FROM: Charles N. Steele
General Counsel

SUBJECT: Request for Extension of Time in MUR 1704 from Mondale for President, Inc., Michael S. Berman, as treasurer

The Office of the General Counsel has received a request from Mondale for President, Inc. and Michael S. Berman, as treasurer, for a 15 day extension in which to respond to the complaint in MUR 1704. In support of the request, respondents cite the fact that they must respond to the subpoena and order in MUR 1667, which requires them to gather substantial information and materials. Respondents note that at the time the complaint in MUR 1704 was filed, they did not know whether their requested extension of time to respond to the subpoena and order would be granted. Consequently, their efforts were concentrated on the preparation of that response and they were unable to devote adequate time and personnel to the preparation of a response to the complaint in MUR 1704. Respondents further cite their increased workload due to the upcoming convention and their planning for the general election as reasons why they cannot prepare an adequate response by the June 18 due date. In addition, respondents point out that the complaint in MUR 1704 contains numerous factual allegations not raised in MUR 1667, which they need to investigate in order to frame a response.

In light of the foregoing, the Office of the General Counsel believes that respondents' request is reasonable. This Office, therefore, recommends that the Commission grant respondents' request.

Recommendation

Grant the request for an entension of time in which to respond to the complaint in MUR 1704 submitted by Mondale

8504050400

for President, Inc. and Michael S. Berman, as treasurer, and send the attached letter.

Attachments

1. Request for extension
2. Proposed letter

8504050401

GCF-3578

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

MONDALE

June 12, 1984

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

RE: MUR 1704

Dear Mr. Steele:

On June 1, 1984, the Mondale for President Committee, Inc. received the above-referenced complaint filed by the National Right to Work Committee. The MPC response is due June 18. Three days before receipt of this complaint, MPC was served with a subpoena for document production and order to answer interrogatories in connection with MUR 1667 which is due on or before June 13.

On June 5, 1984, MPC filed a request for an extension of time in which to respond to the subpoena and interrogatories because of the substantial volume of information sought. To date we have not been informed as to whether that request will be granted. Thus, we have been working on the assumption that our response will be due on June 13.

The preparation of a response to the subpoena and interrogatories in the event that we must respond to them within 15 days has required substantial effort by MPC's legal staff in addition to the increased work load due to convention and general election planning. This has made it very difficult to devote adequate time and personnel to the preparation of a response to MUR 1704.

The complaint filed by NRWC sets forth a substantial number of factual allegations which were not previously raised and responded to in MUR 1667 and requires MPC to investigate those allegations in order to frame a complete and accurate response. Despite our good faith efforts, we do not have the resources to do this within the time allowed.

Attachment 1
p. 1

Paid for by Mondale for President, Inc.

8504050400 2

JUN 12 AM 10:49

MPC therefore requests an additional 15 days beyond the current due date of June 18 in order to prepare its response to MUR 1704 and would further request a reply to this request by Thursday, June 14. Even if the Commission informs us prior to June 13 that we may have an additional 30 days to comply with the subpoena, we will need at least 5 additional days to file a substantive response to MUR 1704 since we have had to divert resources from its preparation.

Thank you for your prompt attention to this matter.

Sincerely,

Lyn Oliphant

Carolyn U. Oliphant
Deputy General Counsel

8504030400 3

Attachment 1
p. 2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Lynn U. Oliphant, Esq.
Mondale for President, Inc.
2201 Wisconsin Avenue, N.W.
Washington, D.C. 20007

Re: MUR 1704
Mondale for President, Inc.
Michael S. Berman, as treasurer

Dear Ms. Oliphant:

This responds to your letter of June 12, 1984, wherein you requested an extension of time of 15 days in which to file a response to the complaint in the above-captioned matter. On June , 1984, the Commission considered your request and voted to approve the extension. Your response is now due on July 3, 1984.

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at 523-4143.

Sincerely,

Charles N. Steele
General Counsel

8504050400 1

Attachment 2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 18, 1984

Margaret E. McCormick, Esquire
AFL-CIO
815 - 16th Street, N.W.
Washington, D.C. 20006

Re: MUR 1704
AFL-CIO
AFL-CIO COPE/PCC
Thomas R. Donahue, as treasurer

Dear Ms. McCormick:

On June 14, 1984, the Commission reconsidered your request for an extension of time in which to respond to the complaint in the above-captioned matter and voted to approve an extension of six days. Your response is now due on June 21, 1984.

If you have any questions, direct them to Stephen Mims, the attorney handling this matter, at 523-4143.

Sincerely,

Charles N. Steele
General Counsel

8504005

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 1704
AFL-CIO	)	
AFL-CIO COPE/PCC	)	
Thomas R. Donahue, Treasurer	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on June 14, 1984, the Commission decided by a vote of 5-1 to take the following actions in MUR 1704:

1. Grant respondents' request for a six day extension of time, until June 21, 1984, in which to respond to the complaint in MUR 1704.
2. Approve the letter attached to the General Counsel's June 13, 1984 Memorandum to the Commission.

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

Attest:

6-14-84
Date

Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary: 6-13-84, 10:10
Circulated on 48 hour tally basis: 6-13-84, 11:00

8504030040006

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES N. STEELE
GENERAL COUNSEL

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

DATE: JUNE 13, 1984

SUBJECT: COMMENTS RE: MUR 1704 - REQUEST FOR RECONSIDERATION OF REQUEST FOR EXTENSION OF TIME - MEMORANDUM TO THE COMMISSION dated June 13, 1984

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

Attachment:
copy of vote sheet

8504050407

SENSITIVE

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

84 JUN 13 A10: 10

June 13, 1984

MEMORANDUM TO: The Commission

FROM: Charles N. Steele CNS/kav
General Counsel

RE: Request for Reconsideration of Request for Extension of Time on MUR 1704

By letter dated June 4, 1984, counsel for the AFL-CIO, AFL-CIO COPE/PCC and Thomas R. Donahue requested an extension of time in which to respond to the complaint in MUR 1704. The Commission denied that request on June 7 , 1984.

By letter dated June 7, 1984, counsel asked that the Commission reconsider its earlier decision and grant respondents a limited extension of six days, from June 15 until June 21, 1984, in which to file their response. Counsel states that such an extension is necessary because co-counsel will be in Switzerland until June 25, thereby necessitating the transfer of written materials from here to Europe and back in order to prepare a full response.

In light of this distance problem and the now limited nature of the request, the Office of the General Counsel recommends that the Commission grant respondents' request for an extension of six days in which to respond to the complaint.

Recommendations

1. Grant Respondents' request for a six day extension of time, until June 21, 1984, in which to respond to the complaint in 1704.

2. Approve the attached letter.

Attachments
1 - Respondents' Request
2 - Proposed letter

3504050409

GCC# 3384

American Federation of Labor and Congress of Industrial Organizations

815 Sixteenth Street, N.W.
Washington, D.C. 20006
(202) 637-5000

EXECUTIVE COUNCIL

LANE KIRKLAND PRESIDENT THOMAS R. DONAHUE SECRETARY-TREASURER

John H. Lyons
[illegible] Raftery
Glenn E. Watts
Angelo Fraser
Lloyd McBride
Wm. W. Winpisinger
Wayne E. Glenn
John J. Sweeney
Barbara Hutchinson
Gerald W. McEntee
Patrick J. Campbell

Thomas W. Gleason
Murray H. Finley
Sol C. Chaikin
Charles H. Pillard
Kenneth T. Blaylock
William H. Wynn
Robert F. Goss
Frank Drozak
Richard L. Kilroy
William H. Bywater
Kenneth J. Brown

Frederick O'Neal
Albert Shanker
Edward T. Hanley
J. C. Turner
Alvin E. Heaps
John DeConcini
Joyce D. Miller
James E. Wenland
Vincent R. Sombrotto
Marvin J. Boede
Owen Bieber

June 7, 1984

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

RE: FEC MUR 1704

Dear Mr. Steele:

The Office of the General Counsel notified me today of the Commission's decision to deny the request of respondents AFL-CIO, AFL-CIO COPE/PCC, and Thomas R. Donahue for a 15 day extension to reply to the complaint in the above-referenced matter.

The purpose of this letter is to ask the Commission to reconsidor that decision at least to the extent of granting respondents a brief extension of six days, from June 15 until June 21, 1984 in which to file their response.

As explained in his letter dated June 4, 1984, my co-counsel Laurence Gold is presently in Geneva, Switzerland participating in meetings of the International Labor Organization and must remain there until June 25, 1984. Therefore the preparation of our response to the complaint in this matter will necessarily require the transmission of information and written materials from one continent to another and back. Under these circumstances, it would be virtually impossible for us to prepare and file our response any sooner than June 21st.

Sincerely,

Margaret E. McCormick

Margaret E. McCormick

Attachment 1

8504050040002

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Margaret E. McCormick, Esquire
AFL-CIO
815 - 16th Street, N.W.
Washington, D.C. 20006

Re: MUR 1704
AFL-CIO
AFL-CIO COPE/PCC
Thomas R. Donahue, as treasurer

Dear Ms. McCormick:

On June , 1984, the Commission reconsidered your request for an extension of time in which to respond to the complaint in the above-captioned matter and voted to approve an extension of six days. Your response is now due on June 21, 1984.

If you have any questions, direct them to Stephen Mims, the attorney handling this matter, at 523-4143.

Sincerely,

Charles N. Steele
General Counsel

8504050410

Attachment 2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 13, 1984

Larry P. Weinberg, Esquire
Kirschner, Weinberg, Dempsey,
Walters and Willig
Suite 800
1100 - 17th Street, N.W.
Washington, D.C. 20036

Re: MUR 1704
AFSCME
AFSCME-PEOPLE-Qualified
William Lucy

Dear Mr. Weinberg:

This responds to you letter of June 6, 1984, wherein you requested an extension of time in which to submit a response to the complaint in the above-captioned matter. The Commission, on June 12, 1984, considered your request and voted to grant an extension of five days. Your response should, therefore, be filed by June 21, 1984.

Should you have any questions, please contact Stephen Mims, the attorney assigned to this matter at 523-4143.

Sincerely,

Charles N. Steele
General Counsel

9504040011

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Mondale for President Committee, et al.	)	MUR 1704
	)	

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of June 12, 1984, do hereby certify that the Commission decided by a vote of 5-1 to take the following actions in MUR 1704:

1. Grant AFSCME, its political committee, AFSCME-PEOPLE-Qualified, and William Lucy, as treasurer, a five day extension to respond to the complaint in MUR 1704.

2. Approve and send the letter attached to the General Counsel's report dated June 8, 1984.

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

Attest:

6-12-84
Date

Marjorie W. Emmons
Secretary of the Commission

8504030402

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

MEMORANDUM TO: CHARLES STEELE, GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/JODY C. RANSOM

DATE: JUNE 8, 1984

SUBJECT: OBJECTION- MUR 1704 Memorandum to the Commission dated June 8, 1984

The above-named document was circulated to the Commission on Friday, June 8, 1984 at 2:00.

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 (comments attached)

This matter will be placed on the Executive Session agenda for Tuesday, June 12, 1984.

8504030401 3

SENSITIVE

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

84 JUN 8 P1:09

June 8, 1984

MEMORANDUM TO: The Commission

FROM: Charles N. Steele
General Counsel

SUBJECT: Request for Extension of Time in MUR 1704

The Office of the General Counsel has received a request for an extension of time in which to respond to the complaint in MUR 1704 from AFSCME and its political committee, AFSCME-PEOPLE-Qualified. Although the request is for an extension through July 15, 1984, counsel indicates orally any extension of time of at least five days would be helpful. The Office of the General Counsel believes AFSCME should, in light of the reasons set forth in the attached letter, be afforded an additional five days in which to respond to the complaint.

Recommendations

1. Grant AFSCME its political committee, AFSCME-PEOPLE-Qualified and William Lucy, as treasuer, a five day extension to respond to the complaint in MUR 1704.

2. Approve and send the attached letter.

Attachments
1. Request for extension
2. Proposed letter

8504041

LAW OFFICES
KIRSCHNER, WEINBERG, DEMPSEY, WALTERS & WILLIG
SUITE 800
1100 17TH STREET, N.W.
WASHINGTON, D.C. 20036

(202) 775-8900

RICHARD KIRSCHNER
LARRY P. WEINBERG
JOHN C. DEMPSEY†
JONATHAN WALTERS
DEBORAH R. WILLIG

ALAINE B. WILLIAMS*
MARILYN S. MAY*
ROBERT T. FENDT*
ROBERT TIM BROWN*
BARBARA KRAFT
MARTHA WALFOORT
LEE W. JACKSON
STUART W. DAVIDSON*
CRAIG BECKER

†ALSO ADMITTED IN VIRGINIA
*NOT ADMITTED IN DISTRICT OF COLUMBIA

PHILADELPHIA OFFICE
SUITE 1100
1429 WALNUT STREET
PHILADELPHIA, PA. 19102
(215) 568-6060

HARRISBURG OFFICE
CITY TOWERS BUILDING
HARRISBURG, PA. 17101
(717) 238-6012

VIRGINIA OFFICE
10511 COMMONWEALTH BLVD.
FAIRFAX, VA. 22032

June 4, 1984

GCC # 3487

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

Re: MUR 1704

Dear Mr. Steele:

We are representing Respondent American Federation of State, County and Municipal Employees (AFSCME) - Public Employees Organized to Promote Legislative Equality (PEOPLE) - Qualified in the above-captioned matter. Enclosed please find a statement of designation of counsel executed by William Lucy, Treasurer of the above-named Respondent.

Respondent received your letter of May 29, 1984 transmitting the complaint in this matter on June 1, 1984. Since your letter states that any response from Respondent is due within 15 days of Respondent's receipt of this complaint, that response would be due on June 16, 1984. Under the best of circumstances, 15 days would be a fairly short period of time within which to prepare a response to such a complex and convoluted complaint. However, Respondent's connected organization, AFSCME, is currently in the process of preparing for a meeting of its International Executive Board to be held the week of June 11, 1984, to be followed by its bienniel International Convention of some 2,500 representatives of its 3,000 locals and almost 100 councils, the week of June 18, 1984. The working, as well as non-working, hours of all of AFSCME's staff who might be involved in providing information necessary to respond to this complaint, as well as those of the undersigned, are presently consumed by preparation for those meetings, and for the period June 11 through June 22 will be consumed by participation in those meetings. The persons who will be involved in preparing a response to this complaint, including the undersigned, will not be back in their offices

Attachment 1 page 1

8504005015

until June 25, 1984. I am therefore requesting an extension of time until 15 days after that date to permit preparation of an adequate response to this complaint. Under the circumstances, I think this request is more than justified. Please advise me as soon as possible as to your response to this request.

Sincerely,

Larry P. Weinberg

LPW/em

Enclosure

8504050401 6

Attachment 1
Page 2

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1704

NAME OF COUNSEL: Larry P. Weinberg

ADDRESS: Kirschner, Weinberg, Dempsey Walters & Willig

1100 17th Street, N.W., Suite 800

Washington, D.C. 20036

TELEPHONE: (202)775-5900

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.

6/14/84
Date

Signature

RESPONDENT'S NAME: AFSCME-Public Employees Organized to Promote Legislative Equality-Qualified

ADDRESS: 1625 L Street, N.W.

Washington, D.C. 20036

(202) 429-1000

HOME PHONE:

BUSINESS PHONE:

Attachment 1
Page 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Larry P. Weinberg, Esquire
Kirschner, Weinberg, Dempsey,
Walters and Willig
Suite 800
1100 - 17th Street, N.W.
Washington, D.C. 20036

Re: MUR 1704
AFSCME
AFSCME-PEOPLE-Qualified
William Lucy

Dear Mr. Weinberg:

This responds to you letter of June 6, 1984, wherein you requested an extension of time in which to submit a response to the complaint in the above-captioned matter. The Commission, on June , 1984, considered your request and voted to grant an extension of five days. Your response should, therefore, be filed by June 21, 1984.

Should you have any questions, please contact Stephen Mims, the attorney assigned to this matter at 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Attachment 2

8504005040017

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 13, 1984

Edward P. Wendel
Assistant General Counsel
United Food and Commercial Workers
International Union
1775 K Street, N.W.
Washington, D.C. 20006

Re: MUR 1704
United Food and Commercial Workers
International Union
United Food and Commercial Workers
Active Ballot Club
Anthony J. Lutty, Treasurer

Dear Mr. Wendel:

This responds to your letter of June 7, 1984, wherein you requested an extension of time to respond to the complaint in the above-captioned matter. The Commission has considered your request and, on June 12, 1984, voted not to grant an extension of time.

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at 523-4143.

Sincerely,

Charles N. Steele (sgnm)
Charles N. Steele
General Counsel

8504050418

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 13, 1984

Kathy L. Krieger, Esquire
United Brotherhood of Carpenters
and Joiners of America
101 Constitution Avenue, N.W.
Washington, D.C. 20001

Re: MUR 1704
United Brotherhood of Carpenters
and Joiners of America
Carpenters Legislative Improvement
League
Patrick J. Campbell, Treasurer

Dear Ms. Krieger:

This responds to your letter of June 5, 1984, wherein you requested an extension of time to respond to the complaint in the above-captioned matter. The Commission has considered your request and, on June 12, 1984, voted not to grant an extension of time.

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at 523-4143.

Sincerely,

Charles N. Steele (SMM)

Charles N. Steele
General Counsel

8504050240019

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 13, 1984

Alan V. Reuther
Assistant General Counsel
International Union, United Automobile,
Aerospace and Agricultural Implement
Workers of America - UAW
1757 K Street, N.W.
Washington, D.C. 20036

Re: MUR 1704
International Union, United
Automobile, Aerospace and
Agricultural Implement Workers
of America - UAW
UAW-V-CAP
Donald J. Moll, Treasurer

Dear Mr. Reuther:

This responds to your letter of June 7, 1984, wherein you requested an extension of time to respond to the complaint in the above-captioned matter. The Commission has considered your request and, on June 12, 1984, voted not to grant an extension of time.

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at 523-4143.

Sincerely,

Charles N. Steele (SMM)
Charles N. Steele
General Counsel

8504050400 20

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1704

NAME OF COUNSEL: Larry P. Weinberg

ADDRESS: Kirschner, Weinberg, Dempsey Walters & Willig

1100 17th Street, N.W., Suite 800

Washington, D.C. 20036

TELEPHONE: (202)775-5900

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.

6/14/84
Date

Signature

RESPONDENT'S NAME: AFSCME-Public Employees Organized to Promote Legislative Equality-Qualified

ADDRESS: 1625 L Street, N.W.

Washington, D.C. 20036

(202) 429-1000

HOME PHONE:

BUSINESS PHONE:

8504050021

Attachment 1
Page 3

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 1704
United Food and Commercial Workers International Union, et. al.	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on June 12, 1984, the Commission decided by a vote of 5-0 to take the following actions in MUR 1704:

1. Do not grant an extension of time to respond to the complaint in MUR 1704 requested by the United Food and Commercial Workers International Union and the United Food and Commercial Workers Active Ballot Club.

2. Do not grant an extension of time to respond to the complaint in MUR 1704 requested by the United Brotherhood of Carpenters and Joiners of America and the Carpenters Legislative Improvement Committee.

3. Do not grant an extension of time to respond to the complaint in MUR 1704 requested by the International Union, United Automobile, Aerospace and Agricultural Implement Workers of America - UAW and UAW-V-CAP.

4. Approve and send the letters attached to the General Counsel's June 8, 1984 Memorandum to the Commission.

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

Attest:

6-12-84
Date

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

9504030022

SENSITIVE

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

84 JUN 8 P5: 45

June 8, 1984

MEMORANDUM TO: The Commission

FROM: Charles N. Steele
General Counsel

SUBJECT: Requests for extensions in MUR 1704

The Office of the General Counsel has received three additional requests for extensions of time to respond to the complaint in MUR 1704. The Office of the General Counsel has reviewed these requests and does not believe, in light of the need to expedite this matter, they set forth a substantial basis to justify the requested extensions.

The Office of the General Counsel recommends therefore, that the attached requests be denied.

Recommendations

1. Do not grant an extension of time to respond to the complaint in MUR 1704 requested by the United Food and Commercial Workers International Union and the United Food and Commercial Workers Active Ballot Club.

2. Do not grant an extension of time to respond to the complaint in MUR 1704 requested by the United Brotherhood of Carpenters and Joiners of America and the Carpenters Legislative Improvement Committee.

3. Do not grant an extension of time to respond to the complaint in MUR 1704 requested by the International Union, United Automobile, Aerospace and Agricultural Implement Workers of America- UAW and UAW-V-CAP.

4. Approve and send the attached letters.

Attachments
1. Request from the United Food and Commercial Workers Union and its political committee.

2. Request from the United Brotherhood of Carpenters and Joiners of America and its political committee.

3. Request from the United Auto Workers and its political committee.

4-6. Proposed letters.

8504023

Legal Department
(202) 466-1520 / 1523

GCC#3516

June 7, 1984

Mr. Stephen Mims
Federal Election Commission
Washington, D.C. 20463

Re: MUR 1704

Dear Mr. Mims:

In connection with the above-captioned case, due to the length of the complaint filed by the complainants, the length of the various attachments, and the number of points raised therein, I would request on behalf of the United Food and Commercial Workers Active Ballot Club, an extension of time from June 15, 1984 to June 30 in which to file a response.

Sincerely yours,

Edward P. Wendel
Assistant General Counsel

EPW:sgg

Attachment 1

William H. Wynn
International
President

Anthony J. Lutty
International
Secretary-Treasurer

United Food & Commercial Workers
International Union, AFL-CIO & CLC
1775 K Street, N.W.
Washington, D.C. 20006
(202) 223-3111

RECEIVED BY THE FEC
84 JUN 8 AM 9:57

United Brotherhood of Carpenters and Joiners of America

WILLIAM A. McGOWAN
GENERAL COUNSEL
ROBERT J. PLEASURE
ASSOCIATE GENERAL COUNSEL
KATHY L. KRIEGER
ASSISTANT GENERAL COUNSEL
EDWARD J. GORMAN, III

101 CONSTITUTION AVE., N. W.
WASHINGTON, D. C. 20001

June 5, 1984

GCC # 3486

Federal Election Commission
Washington, D.C. 20463

ATTN: Charles N. Steele, General Counsel
Kenneth A. Gross, Assoc. General Counsel

RE: MUR 1704

Dear Sir:

Enclosed please find the request of Respondent Carpenters Legislative Improvement Committee for an extension of time to respond in the above-captioned matter, together with a completed Designation of Counsel form.

Very truly yours,

Kathy L. Krieger

Kathy L. Krieger
Counsel for Respondent CLIC

KLK/mkd

Enclosure

8504030402 3

JUN 8 9:53

Attachment 2
Page 1

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1704

NAME OF COUNSEL: Kathy L. Krieger

ADDRESS: 101 Constitution Ave. N.W.
Washington, D.C. 20001

TELEPHONE: 202/546-6206

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

Patrick Campbell
Signature
Treasurer, CLIC

RESPONDENT'S NAME: Carpenters Legislative Improvement Committee

ADDRESS: 101 Constitution Avenue N.W.
Washington, D.C. 20001

HOME PHONE:

BUSINESS PHONE: 202/546-6206

8504026

Attachment 2
Page 2

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ELECTION COMMISSION

THE NATIONAL RIGHT TO WORK COMMITTEE AND RALPH MARTIN (BUD) HETTINGA, JR., Complainants,	)	
v.	)	MUR 1704
WALTER F. MONDALE AND MONDALE FOR PRESIDENT CAMPAIGN COMMITTEE, et al., Respondents.	)	

8504030400 27

REQUEST OF RESPONDENT
CARPENTERS LEGISLATIVE IMPROVEMENT COMMITTEE
FOR EXTENSION OF TIME

The Respondent Carpenters Legislative Improvement Committee ("CLIC"), by its counsel, hereby requests an extension of time from June 15 to and including June 30, 1984, in which to submit its written response to the complaint filed in the above-captioned proceeding. In support of this request CLIC states as follows:

1. The complaint and supporting documents filed in this proceeding were received by Respondent CLIC on May 31, 1984.

Attachment 2
Page 3

2. The materials served upon CLIC comprise a 26-page complaint and approximately 80 pages of affidavits and attachments. Complainants have made extensive factual assertions pertaining to numerous separate labor organizations, political committees, delegate committees, and individuals, and have instituted a comprehensive legal challenge to the structure, operations, financial transactions, and other conduct of such entities and individuals over a period of time. Given the complexity and variety of the factual and legal issues raised herein, counsel for Respondent CLIC will require substantial time to investigate the circumstances alleged, compile relevant documentation, and prepare a legal response to the Commission.

3. Counsel for CLIC is currently engaged in other litigation, including proceedings before the U.S. Court of Appeals for the D.C. Circuit, the National Labor Relations Board, and the Occupational Safety and Health Administration, which will prevent completion of a response in the instant matter by the June 15 deadline. Furthermore, counsel will require additional time in which to consult with political committee and delegate committee representatives who are not currently available in Washington, D.C. Accordingly, in order to permit an informed response and adequate investigation in this matter, CLIC believes that at least a 15-day extension of time is warranted.

8504040028

16 91 AM 9:54

WHEREFORE, for all the above reasons Respondent CLIC respectfully asks that its request be granted and that the time for responding to the complaint herein be extended from June 15 to and including June 30, 1984.

Respectfully submitted,

Kathy L. Krieger

Kathy L. Krieger
Counsel for Respondent
Carpenters Legislative
Improvement Committee
101 Constitution Ave. N.W.
Washington, D.C. 20001
202/546-6206

8504030400229

JUN 6 A9:54

Attachment 2
Page 5

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ELECTION COMMISSION

THE NATIONAL RIGHT TO WORK COMMITTEE AND RALPH MARTIN (BUD) HETTINGA, JR., Complainants,	)	
v.	)	MUR 1704
WALTER F. MONDALE AND MONDALE FOR PRESIDENT CAMPAIGN COMMITTEE, et al., Respondents.	)	

'84 9 AM 9:54

3504030730

REQUEST OF RESPONDENT
CARPENTERS LEGISLATIVE IMPROVEMENT COMMITTEE
FOR EXTENSION OF TIME

The Respondent Carpenters Legislative Improvement Committee ("CLIC"), by its counsel, hereby requests an extension of time from June 15 to and including June 30, 1984, in which to submit its written response to the complaint filed in the above-captioned proceeding. In support of this request CLIC states as follows:

1. The complaint and supporting documents filed in this proceeding were received by Respondent CLIC on May 31, 1984.

Attachment 2
Page 6

2. The materials served upon CLIC comprise a 26-page complaint and approximately 80 pages of affidavits and attachments. Complainants have made extensive factual assertions pertaining to numerous separate labor organizations, political committees, delegate committees, and individuals, and have instituted a comprehensive legal challenge to the structure, operations, financial transactions, and other conduct of such entities and individuals over a period of time. Given the complexity and variety of the factual and legal issues raised herein, counsel for Respondent CLIC will require substantial time to investigate the circumstances alleged, compile relevant documentation, and prepare a legal response to the Commission.

3. Counsel for CLIC is currently engaged in other litigation, including proceedings before the U.S. Court of Appeals for the D.C. Circuit, the National Labor Relations Board, and the Occupational Safety and Health Administration, which will prevent completion of a response in the instant matter by the June 15 deadline. Furthermore, counsel will require additional time in which to consult with political committee and delegate committee representatives who are not currently available in Washington, D.C. Accordingly, in order to permit an informed response and adequate investigation in this matter, CLIC believes that at least a 15-day extension of time is warranted.

8504030401

19:54

Attachment 2
Page 7

WHEREFORE, for all the above reasons Respondent CLIC respectfully asks that its request be granted and that the time for responding to the complaint herein be extended from June 15 to and including June 30, 1984.

Respectfully submitted,

Kathy L. Krieger

Kathy L. Krieger
Counsel for Respondent
Carpenters Legislative
Improvement Committee
101 Constitution Ave. N.W.
Washington, D.C. 20001
202/546-6206

8504030403 2

Attachment 2
Page 8

RECEIVED AT THE FEC
84 JUN 8 A8:52

INTERNATIONAL UNION, UNITED AUTOMOBILE, AEROSPACE & AGRICULTURAL IMPLEMENT WORKERS OF AMERICA—UAW

OWEN F. BIEBER, PRESIDENT RAYMOND E. MAJERUS, SECRETARY-TREASURER

VICE PRESIDENTS

BILL CASSTEVENS • DONALD F. EPHLIN • ODESSA KOMER • MARC STEPP • ROBERT WHITE • STEPHEN P. YOKICH

IN REPLY REFER TO
1757 N STREET, N.W.
WASHINGTON, D.C. 20036
TELEPHONE: (202) 828-8600

June 7, 1984

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

Re: MUR 1704

Dear Mr. Steele:

This is to advise you that I will be representing respondent UAW V-CAP in connection with the above referenced case. Please direct all future communications regarding this matter to my attention at the above address and phone number.

Due to the length and complexity of the matters raised in the complaint, it will take some time to evaluate and prepare a response to the issues raised therein. Accordingly, I hereby request that the Commission grant UAW V-CAP an extension until July 20th in which to file a response to the complaint. I would appreciate it if you would advise me as soon as possible concerning this request, so that I may plan accordingly.

Sincerely,

Alan Reuther

Alan V. Reuther
Assistant General Counsel

AVR:njk
opeiu494

cc: Stephen Mims, Esq.

Attachment 3

8504033

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Edward P. Wendel
Assistant General Counsel
United Food and Commercial Workers
International Union
1775 K Street, N.W.
Washington, D.C. 20006

Re: MUR 1704
United Food and Commercial Workers
International Union
United Food and Commercial Workers
Active Ballot Club
Anthony J. Lutty, Treasurer

Dear Mr. Wendel:

This responds to your letter of June 7, 1984, wherein you requested an extension of time to respond to the complaint in the above-captioned matter. The Commission has considered your request and, on June , 1984, voted not to grant an extension of time.

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at 523-4143.

Sincerely,

Charles N. Steele
General Counsel

8504034

Attachment 4

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Kathy L. Krieger, Esquire
United Brotherhood of Carpenters
and Joiners of America
101 Constitution Avenue, N.W.
Washington, D.C. 20001

Re: MUR 1704
United Brotherhood of Carpenters
and Joiners of America
Carpenters Legislative Improvement
League
Patrick J. Campbell, Treasurer

Dear Ms. Krieger:

This responds to your letter of June 5, 1984, wherein you requested an extension of time to respond to the complaint in the above-captioned matter. The Commission has considered your request and, on June , 1984, voted not to grant an extension of time.

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at 523-4143.

Sincerely,

Charles N. Steele
General Counsel

9504035

Attachment 5

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Alan V. Reuther
Assistant General Counsel
International Union, United Automobile,
Aerospace and Agricultural Implement
Workers of America - UAW
1757 K Street, N.W.
Washington, D.C. 20036

Re: MUR 1704
International Union, United
Automobile, Aerospace and
Agricultural Implement Workers
of America - UAW
UAW-V-CAP
Donald J. Moll, Treasurer

Dear Mr. Reuther:

This responds to your letter of June 7, 1984, wherein you requested an extension of time to respond to the complaint in the above-captioned matter. The Commission has considered your request and, on June , 1984, voted not to grant an extension of time.

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at 523-4143.

Sincerely,

Charles N. Steele
General Counsel

3504030360

Attachment 6

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Ron Krouse
CWA-COPE Supervisor
CWA-COPE Political Contributions Committee
1925 K Street, N.W.
Suite 211
Washington, D.C. 20006

Re: MUR 1704
CWA-COPE Political Contributions Committee
Louis B. Knecht, Treasurer

Dear Mr. Krouse:

This responds to your letter of June 4, 1984, wherein you requested an extension of time to respond to the complaint in the above-captioned matter. The Commission, on June , 1984, considered your request and voted not to grant an extension of time. Your response should, therefore, be filed by June 18, 1984.

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at 523-4143.

Sincerely,

Charles N. Steele
General Counsel

3504053039

6/7/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Margaret E. McCormick, Esquire
AFL-CIO
815 Sixteenth Street, N.W.
Washington, D.C. 20006

Re: MUR 1704
AFL-CIO
AFL-CIO COPE/PCC
Thomas R. Donahue

Dear Ms. McCormick:

This responds to your letter of June 4, 1984, wherein you requested an extension of time to respond to the complaint in the above-captioned matter. The Commission, on June , 1984, considered your request and voted not to grant an extension of time. Your response should, therefore, be filed by June 18, 1984.

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at 523-4143.

Sincerely,

Charles N. Steele
General Counsel

3504040

SKM 6/7/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary

FROM: Office of General Counsel

DATE: June 6, 1984

SUBJECT: MUR 1704 - Memorandum to The Commission
(Re: Request for Extension)

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	[x]	Other (see distribution below)	[ ]

24 HOUR TALLY VOTE

CIRCULATE ON PINK PAPER

SENSITIVE

8504050041

MUR ASSIGNMENT FORM

MUR # 1704

Date Received May 18, 1984

COMPLAINANT National Right to Work Committee and Ralph Martin (Bud) Hettinga, Jr.

RESPONDENT Walter F. Mondale and Mondale For President Campaign Committee; AFL-CIO COPE PCC; et al

BACK ASSIGNED

FINAL REVIEW BY: G.C. C.A.

STAFF ASSIGNED Steve Thomas

DATE 4/24/84

DUE DATE OF FIRST G.C. REPORT Expedite

Signature of G.C.

5/4/84
date

Please return to Docket after assignment.

Expedite / Should discuss ratification question

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 8, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Arthur Rooney, II
Berkman Ruslander Pohl
Lieber and Engel
1 Oxford Center, 40th Floor
Pittsburgh, Pennsylvania 15219

Re: MUR 1704
Pennsylvania 18th Congressional
District Delegates for Mondale
Arthur Rooney, II, treasurer

Dear Mr. Rooney:

This responds to your letter of June 1, 1984, wherein you stated that you did not receive a copy of the complaint in connection with the notification letter in MUR 1704. We have enclosed an additional copy of the complaint for your review. The due date for your response to the complaint in the above-captioned matter will be 15 days from the receipt of this letter.

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202)523-4143.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosure

8504050043

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 8, 1984

Ron Krouse
CWA-COPE Supervisor
CWA-COPE Political Contributions Committee
1925 K Street, N.W.
Suite 211
Washington, D.C. 20006

Re: MUR 1704
CWA-COPE Political Contributions Committee
Louis B. Knecht, Treasurer

Dear Mr. Krouse:

This responds to your letter of June 4, 1984, wherein you requested an extension of time to respond to the complaint in the above-captioned matter. The Commission, on June 7, 1984, considered your request and voted not to grant an extension of time. Your response should, therefore, be filed by June 18, 1984.

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at 523-4143.

Sincerely,

Charles N. Steele
General Counsel

3504050441

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 8, 1984

Margaret E. McCormick, Esquire
AFL-CIO
815 Sixteenth Street, N.W.
Washington, D.C. 20006

Re: MUR 1704
AFL-CIO
AFL-CIO COPE/PCC
Thomas R. Donahue

Dear Ms. McCormick:

This responds to your letter of June 4, 1984, wherein you requested an extension of time to respond to the complaint in the above-captioned matter. The Commission, on June 7 , 1984, considered your request and voted not to grant an extension of time. Your response should, therefore, be filed by June 18, 1984.

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at 523-4143.

Sincerely,

Charles N. Steele
General Counsel

3504005040

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 1704
CWA	)	
CWA-COPE Political Contributions Committee	)	
Louis Knecht, as treasurer	)	
AFL-CIO	)	
AFL-CIO COPE Political Contributions Committee	)	
Thomas R. Donahue, as treasurer	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on June 7, 1984, the Commission decided by a vote of 4-1 to take the following actions in MUR 1704:

1. Deny the request for an extension of time to respond to the complaint in MUR 1704 submitted by CWA, CWA-COPE Political Contributions Committee and Louis B. Knecht, as treasurer.

2. Deny the request for an extension of time to respond to the complaint in MUR 1704 submitted by the AFL-CIO, the AFL-CIO COPE Political Contributions Committee and Thomas R. Donahue, as treasurer.

3. Approve and send the letter attached to the June 6, 1984 Memorandum to the Commission in the above-captioned matter.

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

Attest:

6-7-84
Date

Marjorie W. Emmons
Secretary of the Commission

3504050405

SENSITIVE

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

84 JUN 6 A8: 51

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 6, 1984

MEMORANDUM TO: The Commission

FROM: Charles N. Steele
General Counsel

SUBJECT: Request for Extension of Time to file
A Response to the Complaint in MUR 1704

The Office of the General Counsel has received two requests for extensions of time to respond to the complaint in MUR 1704. This Office does not believe, in light of the urgency of this matter, that the requested extensions warrant Commission approval.

The Office of the General Counsel recommends, therefore, that the requests be denied.

Recommendations

1. Deny the request for an extension of time to respond to the complaint in MUR 1704 submitted by CWA, CWA-COPE Political Contributions Committee and Louis B. Knecht, as treasurer.

2. Deny the request for an extension of time to respond to the complaint in MUR 1704 submitted by the AFL-CIO, the AFL-CIO COPE Political Contributions Committee and Thomas R. Donahue, as treasurer.

3. Approve and send the attached letter.

Attachment

1-2. Requests for extension
3-4. Proposed letters

3 5 0 4 0 5 0 4 0 1 7

2223493

James B. Booe
Chairman

Louis B. Knecht
Treasurer

'84 PM 1:23

CWA-COPE
Political Contributions Committee

June 4, 1984

File: 1.34

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

Re: MUR 1704

Dear Mr. Mims:

This is in reply to the General Counsel's letter of May 29 notifying our Committee about the complaint filed by the National Right to Work Committee.

The Treasurer of CWA-COPE PCC, Louis B. Knecht, has asked that I represent his views on this matter.

As we discussed on June 1, I would like to ask for a three week extension until July 6, 1984 in order to give a proper reply to the complaint. I am getting married on June 10, and then will be on my honeymoon until June 24.

I would appreciate your prompt consideration of this request as the last day I plan to be in my office is June 6. Please call me at 728-2502 if there are any questions.

Sincerely,

Ron Krouse

Ron Krouse, CWA-COPE Supervisor

/ljp

1925 K Street, N.W. Suite 211 Washington, D.C. 20006 (202) 785-6737 (202) 785-5875

Paid for and authorized by CWA on behalf of a joint fundraising effort for CWA-COPE PCC and the AFL-CIO COPE PCC.

2223493

Attachment 1

American Federation of Labor and Congress of Industrial Organizations

815 Sixteenth Street, N.W.
Washington, D.C. 20006
(202) 637-5000

EXECUTIVE COUNCIL

LANE KIRKLAND PRESIDENT THOMAS R. DONAHUE SECRETARY-TREASURER

John H. Lyons
S. Frank Raftery
Glenn E. Watts
Angelo Fosco
Lloyd McBride
Wm. W. Winpisinger
Wayne E. Glenn
John J. Sweeney
Barbara Hutchinson
Gerald W. McEntee
Patrick J. Campbell

Thomas W. Gleason
Murray H. Finley
Sol C. Chaikin
Charles H. Pillard
Kenneth T. Blaylock
William H. Wynn
Robert F. Goss
Frank Drozak
Richard I. Kilroy
William H. Bywater
Kenneth J. Brown

Frederick O'Neal
Albert Shanker
Edward T. Hanley
J. C. Turner
Alvin E. Heaps
John DeConcini
Joyce D. Miller
James B. Hatfield
Vincent R. Sombrotto
Marvin J. Boede
Owen Bieber

MUR 1704
Memo

June 4, 1984

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

Re: FEC MUR 1704

Dear Mr. Steele:

The purpose of this letter is to request an extension of time for respondents the American Federation of Labor and Congress of Industrial Organizations ("AFL-CIO"), AFL-CIO Committee on Political Education Political Contributions Committee, and Thomas R. Donahue to reply to the complaint filed in the above-referenced matter.

Respondents received the complaint herein on May 31, 1984. Due to a previous and unalterable commitment, I must be in Geneva, Switzerland for meetings of the International Labor Organization from June 4, 1984 until June 25, 1984. My co-counsel in this matter, Margaret E. McCormick, is presently counsel in 17 MURs now pending before the Commission, and has a response due in MUR 1696 on June 6, 1984, in MUR 1702 on June 14, 1984, and is in the process of conciliating MUR 1623. Due to my absence from this country, she will also have to undertake a number of additional responsibilities thus increasing her already substantial workload. For the foregoing reasons, it would be difficult if not impossible for us to prepare a proper reply in this matter within the normal 15-day reply period.

Accordingly, we hereby request a 15-day extension of time from June 15, 1984 to June 30, 1984 in which to file the reply of respondents AFL-CIO, AFL-CIO COPE/PCC and Thomas R. Donahue in this matter.

Sincerely,

Laurence Gold

Attachment 2
Page 1

3504042

American Federation of Labor and Congress of Industrial Organizations

815 Sixteenth Street, N.W.
Washington, D.C. 20006
(202) 637-5000

EXECUTIVE COUNCIL

LANE KIRKLAND PRESIDENT THOMAS R. DONAHUE SECRETARY-TREASURER

John H. Lyons
S. Frank Raftery
Glenn E. Watts
Angelo Fosco
Lloyd McBride
Wm. W. Winpisinger
Wayne E. Glenn
John J. Sweeney
Barbara Hutchinson
Gerald W. McEntee
Patrick J. Campbell

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Frank Drozak
Richard I. Kilroy
William H. Bywater
Kenneth J. Brown

Frederick O'Neal
Albert Shanker
Edward T. Hanley
J. C. Turner
Alvin E. Heaps
John DeConcini
Joyce D. Miller
James E. Hatfield
Vincent R. Sombrotto
Marvin J. Boede
Owen Bieber

Mur 1704
Memo

June 4, 1984

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

Re: FEC Mur 1704

Dear Mr. Steele:

Pursuant to 11 C.F.R. 111.23, the American Federation of Labor and Congress of Industrial Organizations ("AFL-CIO"), the AFL-CIO Committee on Political Education Political Contributions Committee, and the undersigned hereby designate Laurence Gold and Margaret E. McCormick as our counsel with respect to the above-referenced matter.

Mr. Gold and Ms. McCormick are authorized to receive any notifications and other communications from the Commission in connection with this matter and to act on our behalf before the Federal Election Commission.

Mr. Gold's and Ms. McCormick's address is AFL-CIO Legal Department, 815 16th Street, N. W., Room 808, Washington, D. C. 20006. Their office telephone number is (202) 637-5390. Mr. Gold's home telephone number is (202) 966-9331; Ms. McCormick's home telephone number is (301) 656-9612.

Sincerely,

Thomas R. Donahue

Thomas R. Donahue
Secretary-Treasurer

Attachment 2
Page 2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Ron Krouse
CWA-COPE Supervisor
CWA-COPE Political Contributions Committee
1925 K Street, N.W.
Suite 211
Washington, D.C. 20006

Re: MUR 1704
CWA-COPE Political Contributions Committee
Louis B. Knecht, Treasurer

Dear Mr. Krouse:

This responds to your letter of June 4, 1984, wherein you requested an extension of time to respond to the complaint in the above-captioned matter. The Commission, on June , 1984, considered your request and voted not to grant an extension of time. Your response should, therefore, be filed by June 18, 1984.

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at 523-4143.

Sincerely,

Charles N. Steele
General Counsel

3504030511

Attachment 5

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Margaret E. McCormick, Esquire
AFL-CIO
815 Sixteenth Street, N.W.
Washington, D.C. 20006

Re: MUR 1704
AFL-CIO
AFL-CIO COPE/PCC
Thomas R. Donahue

Dear Ms. McCormick:

This responds to your letter of June 4, 1984, wherein you requested an extension of time to respond to the complaint in the above-captioned matter. The Commission, on June , 1984, considered your request and voted not to grant an extension of time. Your response should, therefore, be filed by June 18, 1984.

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at 523-4143.

Sincerely,

Charles N. Steele
General Counsel

3504052

Attachment 4

3 5 7 4 0 3 7 4 0 5 5 3

5/29/84

PS Form 3811, July 1983

● 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: Attorney Richard Truesdale
Democratic Party District
Delegates for Manchester
Elections
Manchester, NH 03054

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

ARTICLE NUMBER
943759

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
6-6-84

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

8. POSTMASTER'S INITIALS

JUN 8 1984

RETURN RECEIPT

GPO: 1983-379-865

MUR 1704 Mins

3571405404

6/29/84

PS Form 3811, July 1983

● 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: LAWRENCE ROSENWALD, Trustee
Delegate for mendele - Mag/Richmond 11/10
274 Lafayette Ave
Brooklyn, NY 11238

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

ARTICLE NUMBER
943839

(Always obtain signature of addressee or agent)

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

6/29/84

8. ADDRESSEE'S ADDRESS (Only if requested and fee is paid)
274 Laf Ave

7. UNABLE TO DELIVER BECAUSE:

9. EMPLOYEE'S INITIALS

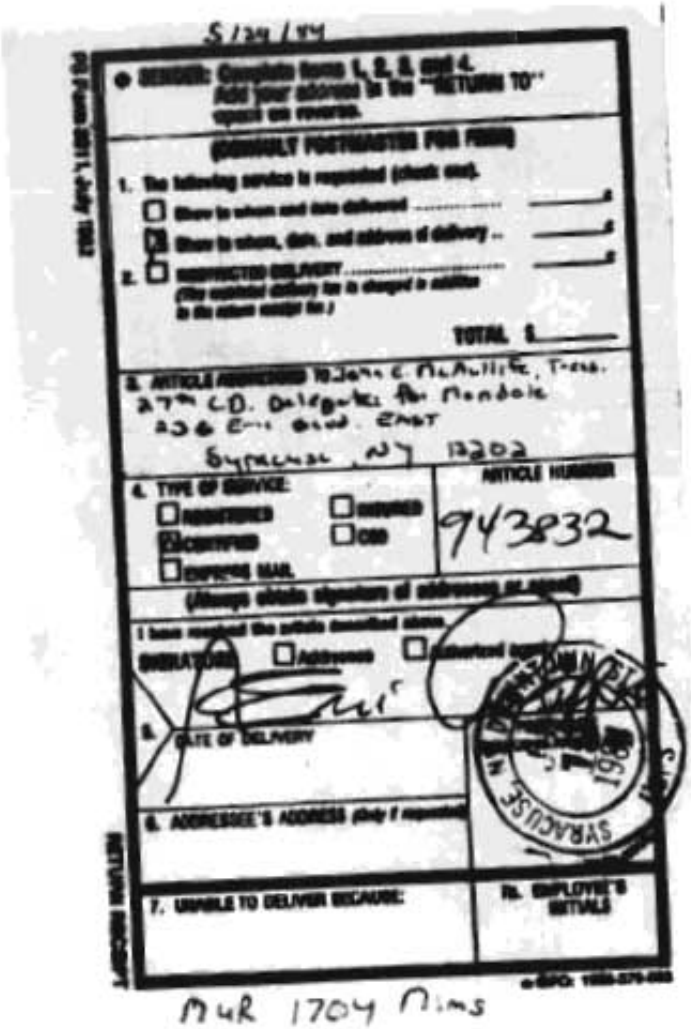
GPO: 1983-370-865

RETURN RECEIPT

Mue 1704 M.ms

3 3 3 4 0 3 4 0 5 7

5/24/84



• 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: John E. McAuliffe, Treas.
   27th C.D. Delegate to Mondale
   236 E. Onondaga East
   Syracuse, NY 13202

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

ARTICLE NUMBER: 943832

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

5. DATE OF DELIVERY

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

8. EMPLOYEE'S INITIALS

RETURN RECEIPT

PS Form 3811, July 1983

SYRACUSE NY 1984

MAR 1704 Nims

3 3 1 4 3 3 2 4 0 3 5 5

S 1/26/84

PS Form 3811, July 1983

● 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: Ellen O. Meyer, Pres.
4th C.D., Delegate For Nadd
44 Nadd-ees Ave
Annapolis, MD 21401

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

ARTICLE NUMBER: 943816

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

Ellen O'Meyer

5. DATE OF DELIVERY: 6/18/84

6. ADDRESSEE'S ADDRESS (Only if requested and fee paid)

7. UNABLE TO DELIVER BECAUSE:

8. EMPLOYEE'S INITIALS

USPS 1983

RETURN RECEIPT

NAR 1704 M.15

3 5 1 3 2 0 4 0 5 7

MUR 1784 Mims

PS Form 3811, Dec. 1988

● 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: West New York
Elect Mondale Cmte - 31st CD
301 Presidel Place
Williamsville, NY 14221

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

ARTICLE NUMBER: 943991

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

X

5. DATE OF DELIVERY: 6/23/84

POSTMARK: BUFFALO NY JUN 1984

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

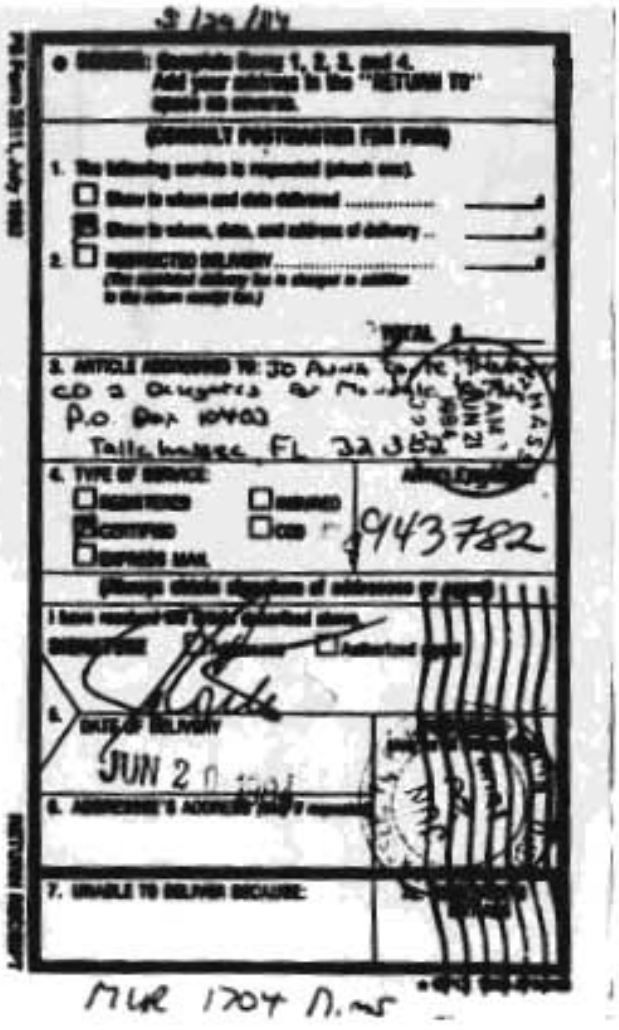
7a. EMPLOYEE'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

10/19/84

3 5 7 4 0 5 9

3/29/04



MLR 1704 A.25

Mike Day Maine

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: CD 6 "Delegates for Mondale"
9875 S.W. College Rd
Ocala, FL 32674

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

ARTICLE NUMBER: 943000

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

X Carl W. Hamm

DATE OF DELIVERY: 6-22-84

POSTMARK

6. ADDRESSEE'S ADDRESS (Only if requested)

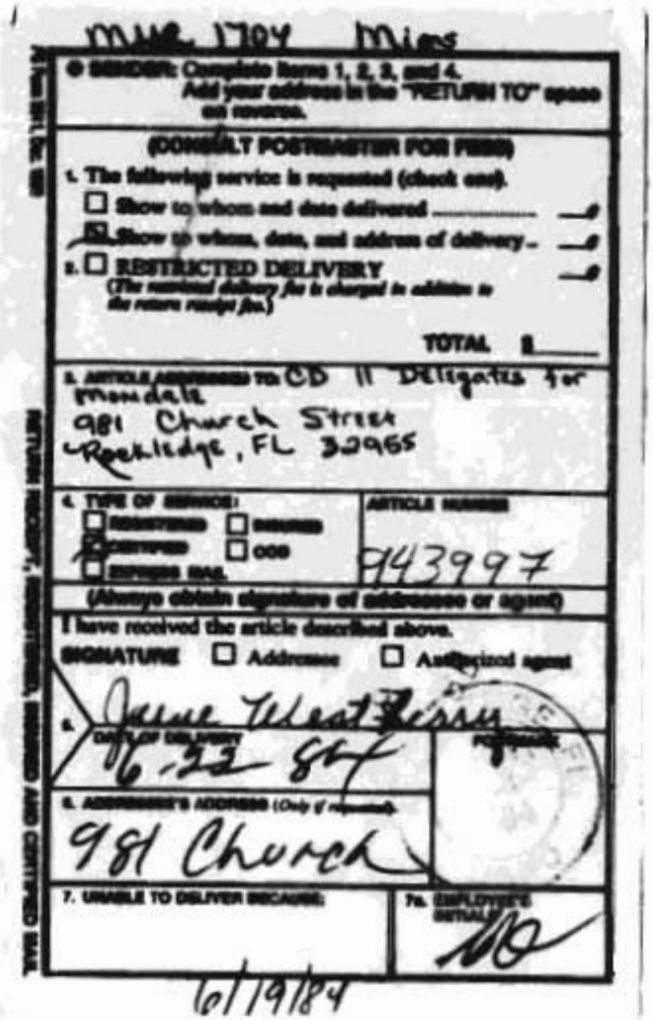
7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS: Emy

PS Form 3811, Feb. 1983 RETURN RECEIPT, REGISTERED AND CERTIFIED MAIL

6/19/84

3 5 1 4 2 3 3 4 0 3 7



MMC 1704 Miles

● 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 .. —¢
- ☐ RESTRICTED DELIVERY —¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $ ____

2. ARTICLE ADDRESSED TO: CD 11 Delegates for Immediate
981 Church Street
Rockledge, FL 32955

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

ARTICLE NUMBER: P43997

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

X Jane West Berry

DATE OF DELIVERY: 6-22-84

POSTMARK

6. ADDRESSEE'S ADDRESS (Only if requested)
981 Church

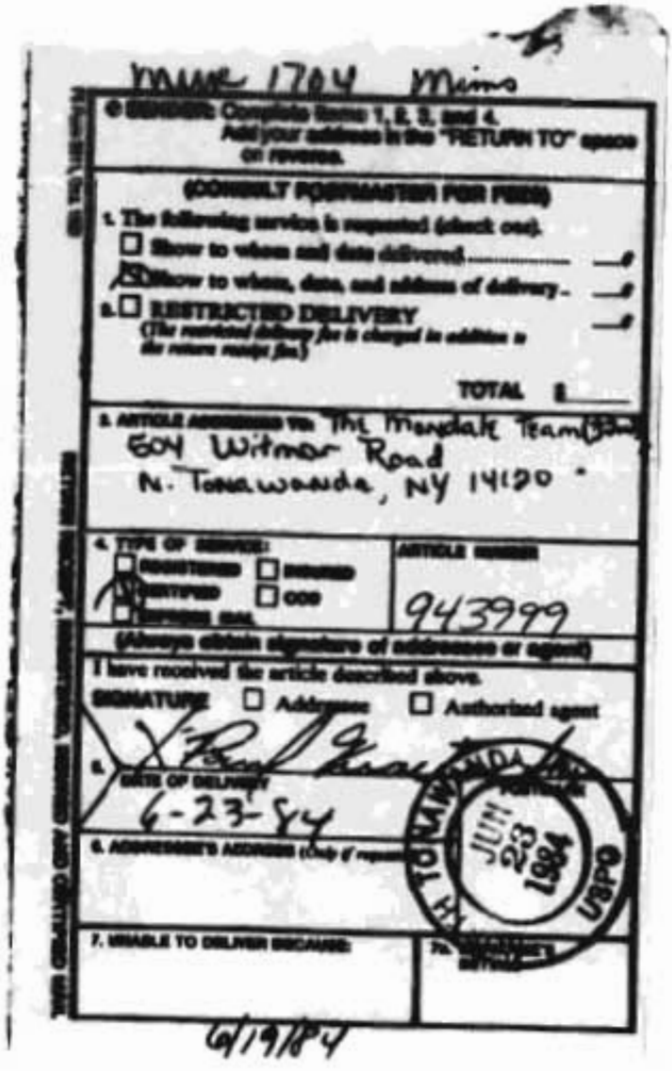
7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS: MD

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

6/19/84

3 3 7 3 4 0 3 7



YMMR 1704 Mimo

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: The Mondak Team
604 Witmer Road
N. Tonawanda, NY 14120

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

ARTICLE NUMBER
943999

(Always obtain signature of addressee or agent)

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

X [signature]

5. DATE OF DELIVERY
6-23-84

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

8. POSTMARK
N TONAWANDA NY
JUN 23 1984
USPO

6/19/84

3 5 7 4 2 3 7 4 0 5 1

3 3 2 4 0 3 2 4 0 5 2

MUK 1704 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 .. —¢
- ☐ RESTRICTED DELIVERY —¢
  (The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $ —

2. ARTICLE ADDRESSED TO: Delegatis Cmda E
Mercado E
P. O. Box 4089
San Juan, PR 00905

4. TYPE OF SERVICE:	ARTICLE NUMBER
☐ REGISTERED ☐ INSURED ☒ CERTIFIED ☐ COD ☐ EXPRESS MAIL	943995

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY

6. ADDRESSEE'S ADDRESS (Only if requested and fee paid)

7. UNABLE TO DELIVER

8. POSTMARK

1704 98

6/19/84

MWR 1704 Mims

PS Form 3811, Mar. 1988

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● 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: Pamela Davis, Recruiter
Mandala 2nd C.D. Delgate
Recruitment Center
1009 Kempsville Rd
Virginia Beach, VA 23464

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

ARTICLE NUMBER
943992

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☒ Authorized agent

5. A M Biondi

DATE OF DELIVERY
6-25-84

POSTMARK
JUN 25 1984

6. ADDRESSEE'S ADDRESS (Only if requested)
1990 Kempsville Rd
23464

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

6/19/84

3 5 2 4 0 3 2 4 0 5 3

3 3 7 4 0 3 2 4 0 5 1

Mail 1704 Mrino

PS Form 3811, Mar. 1988

INTERNATIONAL REGISTERED, INSURED AND CERTIFIED MAIL

● 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: 18th CD Delegates for Mondale
4095 Tilghman Street
Allentown, PA 18104

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

ARTICLE NUMBER: 943974

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

C. Hilma

5. DATE OF DELIVERY: JUN 25 1984

POSTMARK: ALLENTOWN, PA JUN 25 1984 REGISTRY SECTION

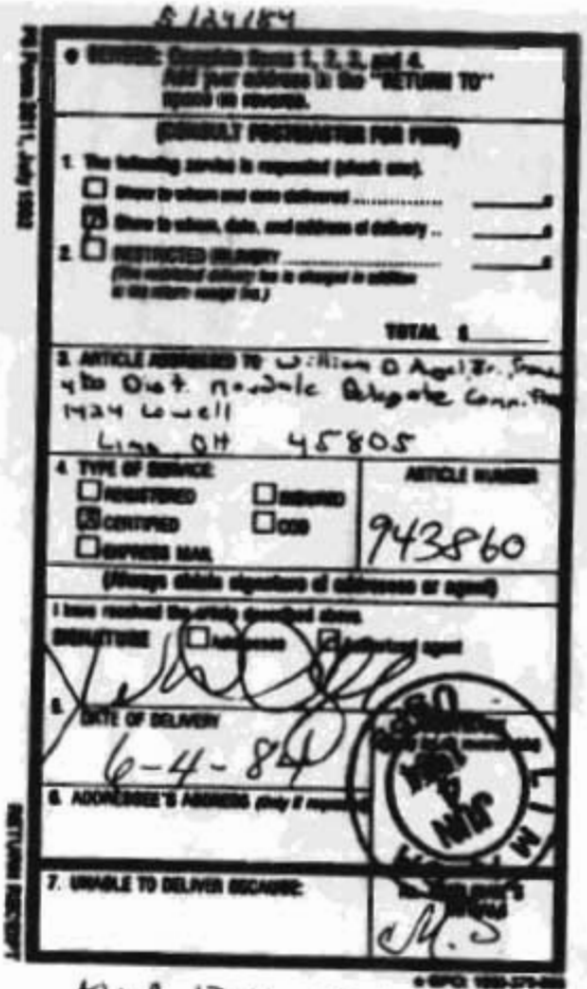
6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

6/19/84

3 3 7 4 3 3 0 4 0 5 7

6/22/84



- 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: William O Aguilar, Jr. Esq.
4a Out of Network Delegate Comp. Plan
1924 Lowell
Lima OH 45805
4. TYPE OF SERVICE: ☐ REGISTERED ☐ INSURED ☒ CERTIFIED ☐ COD ☐ EXPRESS MAIL
ARTICLE NUMBER: 943860
(Always obtain signature of addressee or agent)
I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
6. DATE OF DELIVERY: 6-4-84
7. UNABLE TO DELIVER BECAUSE:
POSTMARK
M.S
ADDRESS (Complete only if requested)
RETURN RECEIPT

MAR 1704 MMS

Myr. 1704 Mimo

● 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 ____ ¢
A 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: 16th CD Delegate
Coalition for Mandate
236 E. 87th Street
New York, NY 10028

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

ARTICLE NUMBER
943001

(Always obtain signature of addressee or agent)

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

6. DATE OF DELIVERY 6/25/84 POSTMARK

8. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE: 9a. EMPLOYEE'S INITIALS

6/19/84

PS Form 3811, Dec. 1980 RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED

3 5 5 4 0 5 0 4 0 5 5

3 3 7 4 2 3 4 0 5 7

MVE 1704 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: Philadelphia, Pennsylvania
County Executive, Cmda
1421 Chestnut Street
Philadelphia, PA 19102

4. TYPE OF SERVICE:
☐ REGISTERED ☐ INSURED
☐ CERTIFIED ☐ COD
☐ EXPRESS MAIL
ARTICLE NUMBER
943993

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
1-25-84

POSTMARK

6. ADDRESSEE'S ADDRESS (Only if requested)
1421 WALNUT
Phila PA 19

7. UNABLE TO DELIVER BECAUSE:

8. [illegible]

STREET, AND P.O. BOX

6/19/84

Mail 1784 Mia

● SENDER: Complete items 1, 2, 3, and 4.
Add your address in the "RETUR..
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: FM District Delegate
for Mandela
C/o John D. VanDusen
39 Pond Street
Marblehead, MA 01948

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

ARTICLE NUMBER
943996

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
X John D. VanDusen

5. DATE OF DELIVERY
JUL 2 1984

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

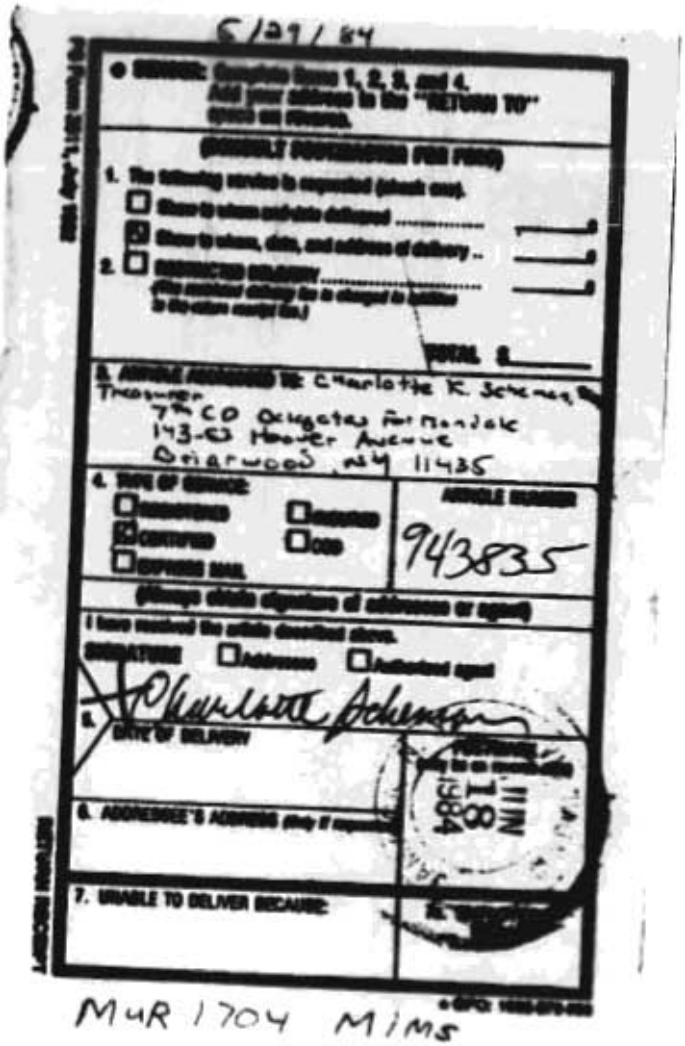
8a. EMPLOYEE'S INITIALS

6/19/84

PS Form 3811, Mar. 1979 RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

3 5 7 4 0 3 7 4 0 5 3

3 3 7 4 0 3 5 7 4 0 3 5 2



MUR 1704 MIMS

9 3 1 4 0 3 2 4 0 7 0

5/29/84

PS Form 3811, July 1983

● GENERAL: 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: Fannie Lou Hamer, Treasurer Freedom Summer & Rights For the Mississippi Committee 610 E. Ca Ave. Hollada, MT 59601

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

ARTICLE NUMBER: 943762

(Always obtain signature of addressee or agent)

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

X [signature]

5. DATE OF DELIVERY: 6-2-84

POSTMARK (Only for air mail or special rate)

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

8. EMPLOYEE'S INITIALS

RETURN RECEIPT

MUR 1704 Mins

3574035240071

9/29/84

PS Form 3811, July 1983

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

(ENDORSE 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: Harriet Thompson, Pres.
ADSE C.O. Delegates for Mondale
130 Martin Place
Nyack New City, NY 10956

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

ARTICLE NUMBER
943830

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
6/4/84 R. Moore

5. DATE OF DELIVERY

POSTMARK (may be on reverse side)

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

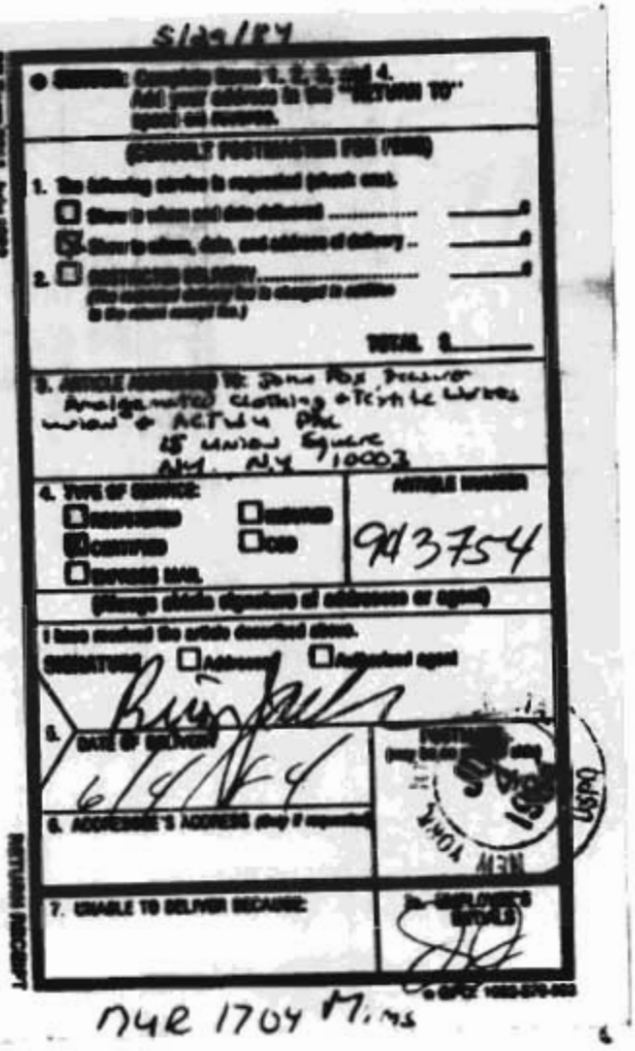
RETURN RECEIPT

• GPO: 1983-376-865

MUR 1704 M.ms

3 7 2 4 0 7 2

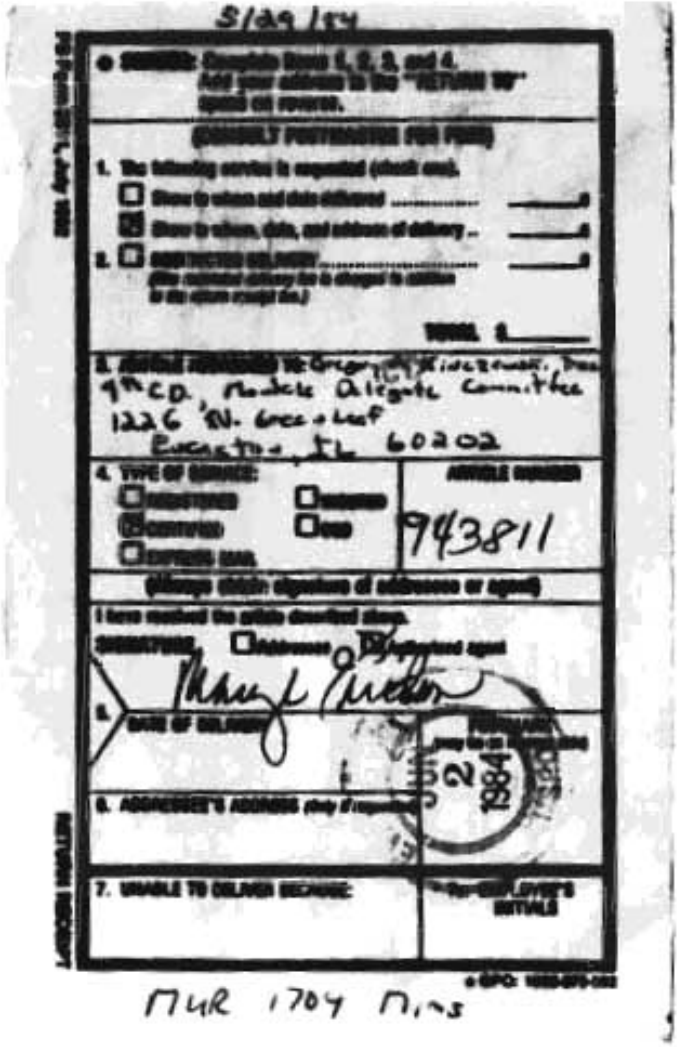
5/29/24



Mar 1704 Mins

3 5 5 4 0 3 2 4 0 7 3

5/29/84



9th C.D., Mondale Delegate Committee
1226 N. Greenleaf
Evanston, IL 60202

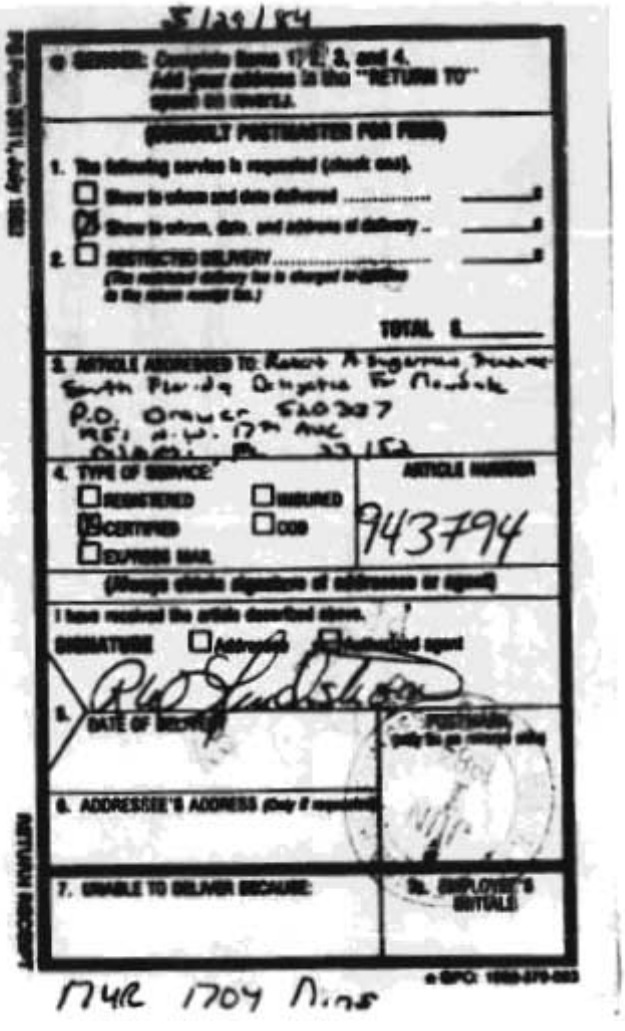
943811

JUN 2 1984

MUR 1704 MNS

3 5 1 1 3 5 7 4 9 0 7 1

5/29/84



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

(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: Robert A Sugarman Trustee
South Florida Chapter Fl Nat'l Bk
P.O. Drawer 520307
Miami, FL 33152

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

ARTICLE NUMBER: P 943794

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

X R W Landsberg

5. DATE OF DELIVERY

POSTMARK (only to be affixed when)

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

8. EMPLOYEE'S INITIALS

RETURN RECEIPT

• GPO: 1983-370-865

MAR 1704 Mins

3 5 2 4 0 3 2 4 0 7 7

S143 124

PS Form 3811, July 1988

● 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: Roger Duncan, Pres
14th Dist. Mowdy Aircraft Com.
1407A Briscoe
Austin, TX 78704

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

ARTICLE NUMBER: 943884

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☒ Authorized agent

J. Clifton Duncan

5. DATE OF DELIVERY: 6-4-84

POSTMARK

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

8. EMPLOYEE'S INITIALS: WJ

RETURN RECEIPT

GPO: 1988-279-003

MyR 1704 mms

3 5 0 4 0 3 0 4 0 0 7 5

5/23/84

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

(ADDITIONAL POSTAGE 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: (Name, Post Office, State, and ZIP Code)
CD #1 Delegates for Pinedale
7320 North Palafox Street
Pensacola, FL 32514

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

ARTICLE NUMBER
943781

(Always obtain signature of addressee or agent)

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

5. [signature]

6. DATE OF DELIVERY
6/4/84

POSTMARK
(may be on reverse side)

8. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

9a. EMPLOYEE'S INITIALS

GPO: 1983-370-865

MUR 1704 M.rs

3 5 0 4 0 3 7 4 0 7 7

5/29/84

PS Form 3811, July 1983

● 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: Francis J. Kloster, Pres.
Delegates For Module 25th District
1 Hartford Terrace
New Hartford, NY 13413

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

ARTICLE NUMBER
943841

(Always obtain signature of addressee or agent)

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

5. Martin Kloster

DATE OF DELIVERY
6/1/84

NEW HARTFORD NY
1984
USPO

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

8a. EMPLOYEE'S INITIALS

RETURN RECEIPT

GPO: 1983-379-803

Mar [redacted] 1704 n.ms

5/29/84

PS Form 3811, July 1983

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: (INSURANCE & DOMESTIC MAIL ONLY)
Nathers NY Delegates for Nowak
PO Box 127
LAKE CLEAR, NY 12945

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

ARTICLE NUMBER: P 943851

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

C.D. Bonn

5. DATE OF DELIVERY

6. ADDRESSEE'S ADDRESS (Only if requested and fee paid)

7. UNABLE TO DELIVER BECAUSE:

LAKE CLEAR, N.Y. JUN 1 1984

RETURN RECEIPT

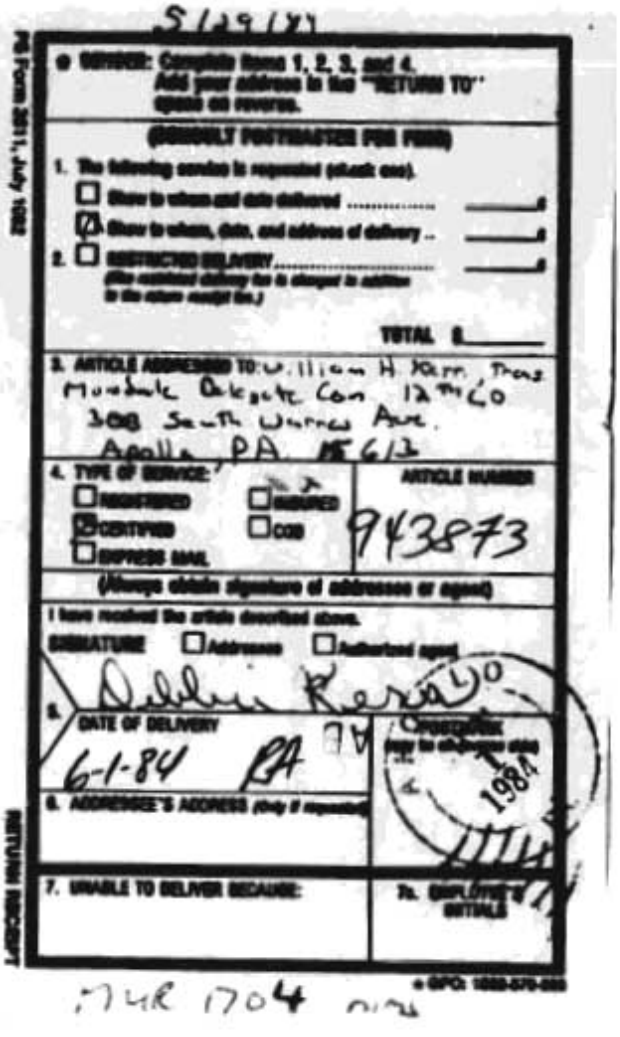
GPO: 1983-370-865

Mar 1704 mine

3 5 3 2 3 2 4 9 7 2

3574202340727

5/29/84



PS Form 3811, July 1983

● 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: William H. Kerr, Pres
Mundale Delgate Con 12th Co
308 South Union Ave.
Apollo, PA 15613

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

ARTICLE NUMBER
943873

(Always obtain signature of addressee or agent)

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

X Debbie Rosado

DATE OF DELIVERY
6-1-84 PA

POSTMARK
(only for domestic use)
1984

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

8. EMPLOYEE'S INITIALS

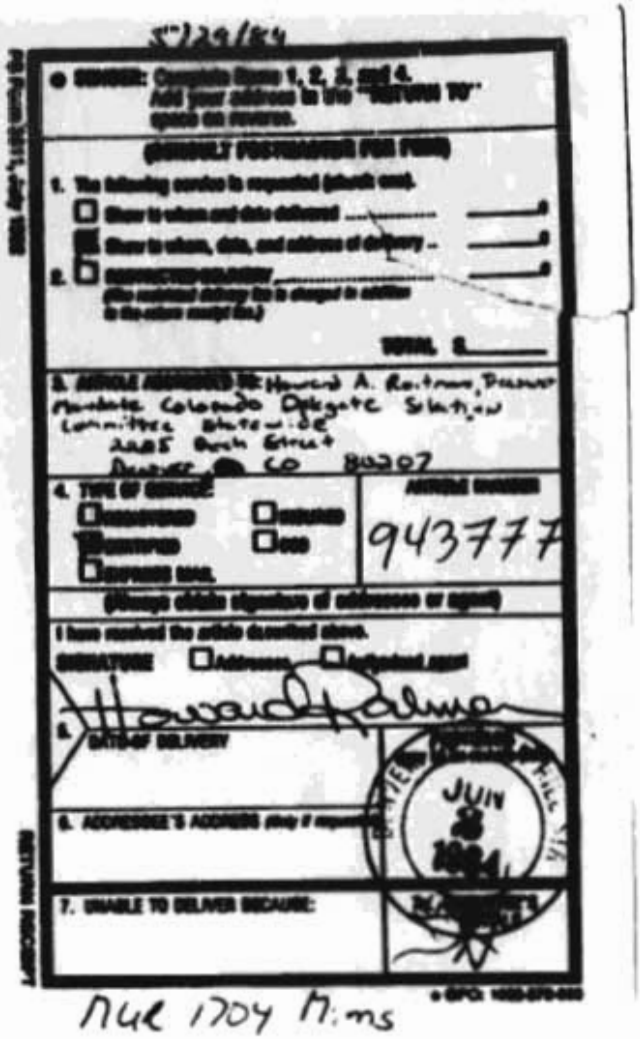
RETURN RECEIPT

• GPO: 1983-370-865

THR 1704 nm

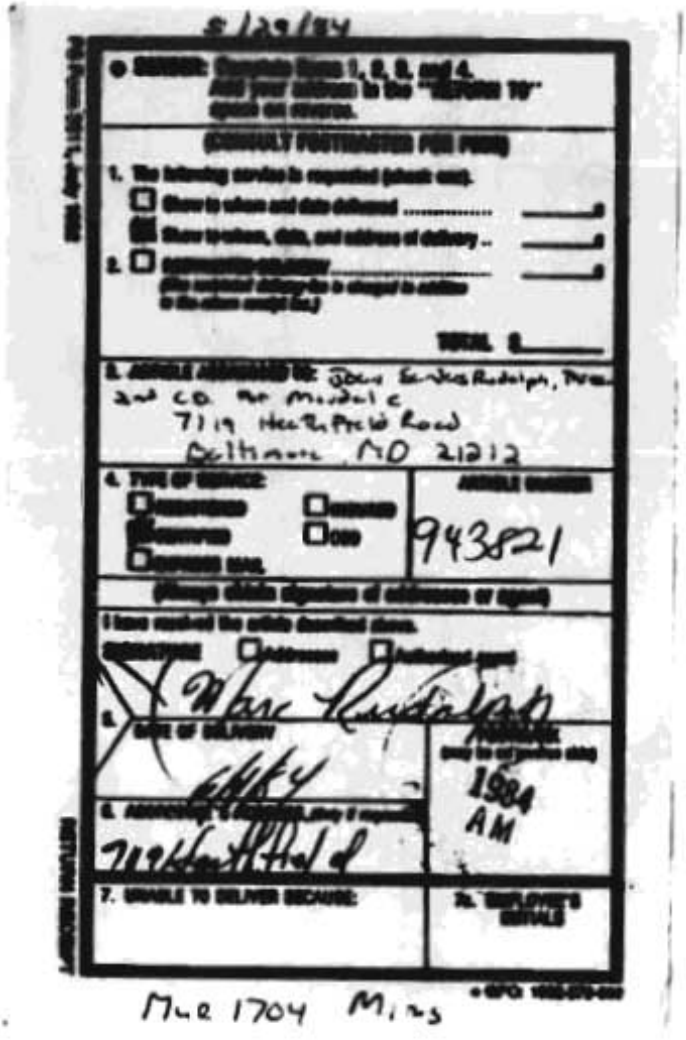
3 5 7 4 0 1 1 4 0 3 7

5/29/84



NUL 1704 Mims

3 5 3 4 3 3 4 9 3 1



8/29/84

RETURN RECEIPT

2. ARTICLE ADDRESSED TO: John Sinkie Rudolph, Pres.
and CO for Mindal c
7119 Heathfield Road
Baltimore MD 21212

4. TYPE OF SERVICE:
Registered
Certified

ARTICLE NUMBER
943821

I have received the article described above.

SIGNATURE

6. DATE OF DELIVERY
8/29/84

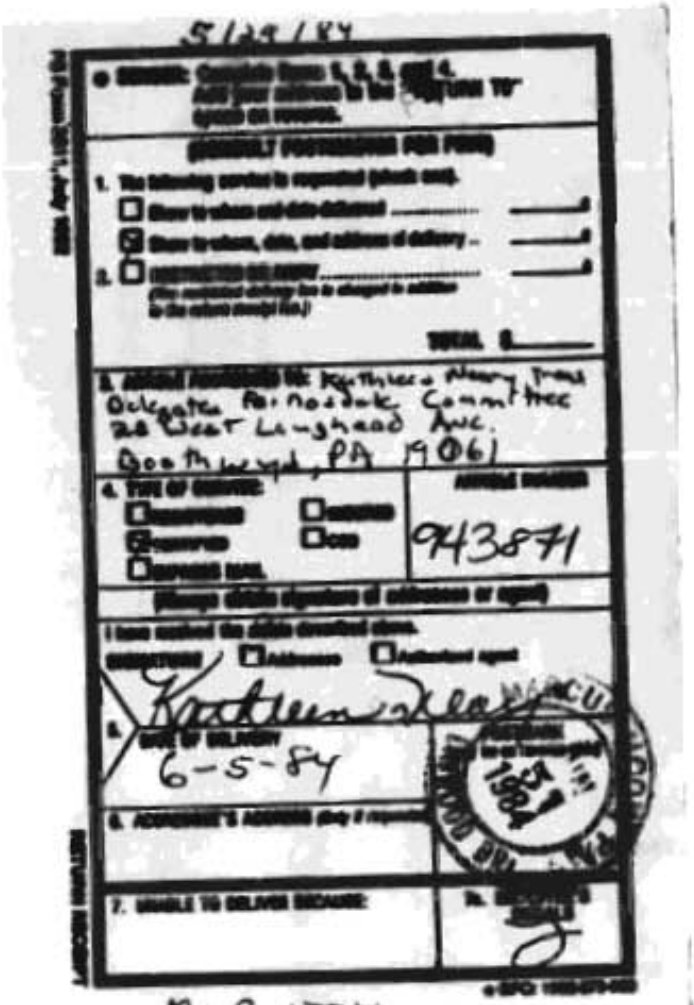
8. ADDRESSEE'S ADDRESS
7119 Heathfield

POSTMARK
1984
AM

7. UNABLE TO DELIVER BECAUSE:

Mar 1704 Mins

5/29/84



MGR 1704 minis.

3570405409 3

S129124

PS Form 3811, July 1983

• 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: William H. Simon Treas.
Mondale Delegates, D.C. Committee
417 Randolph St. N.W.
Washington, D.C. 20001

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

ARTICLE NUMBER
P 943771

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
5. William H. Simon

DATE OF DELIVERY
6-4-84

POSTMARK
(only for certified mail)
NOV
USPO

6. ADDRESSEE'S ADDRESS (Only if requested and fee paid)
CUSTOMS HOUSE STA.
WASH. DC 20018

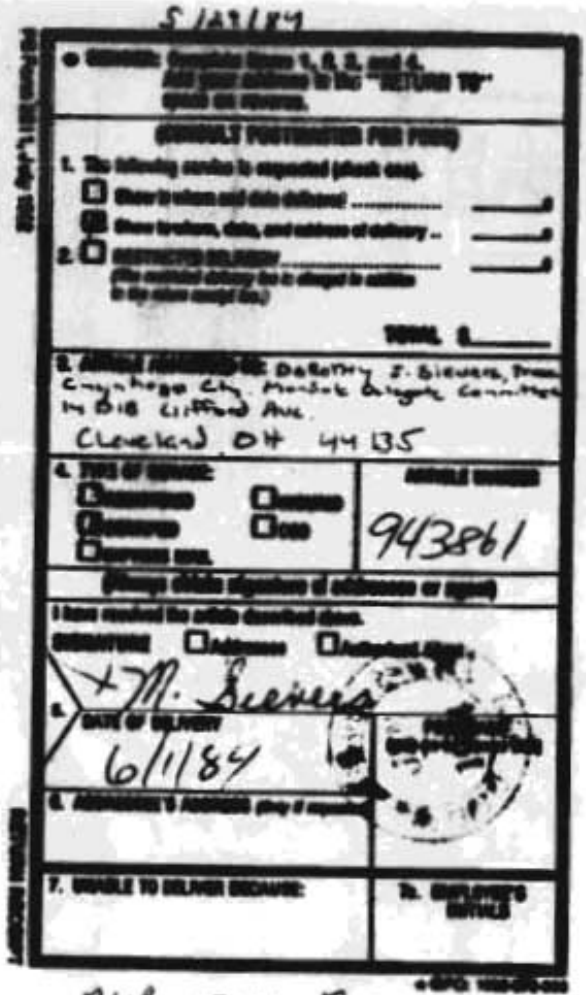
7. UNABLE TO DELIVER BECAUSE:

8. EMPLOYEE'S INITIALS

RETURN RECEIPT

MUR 1704

5/23/84

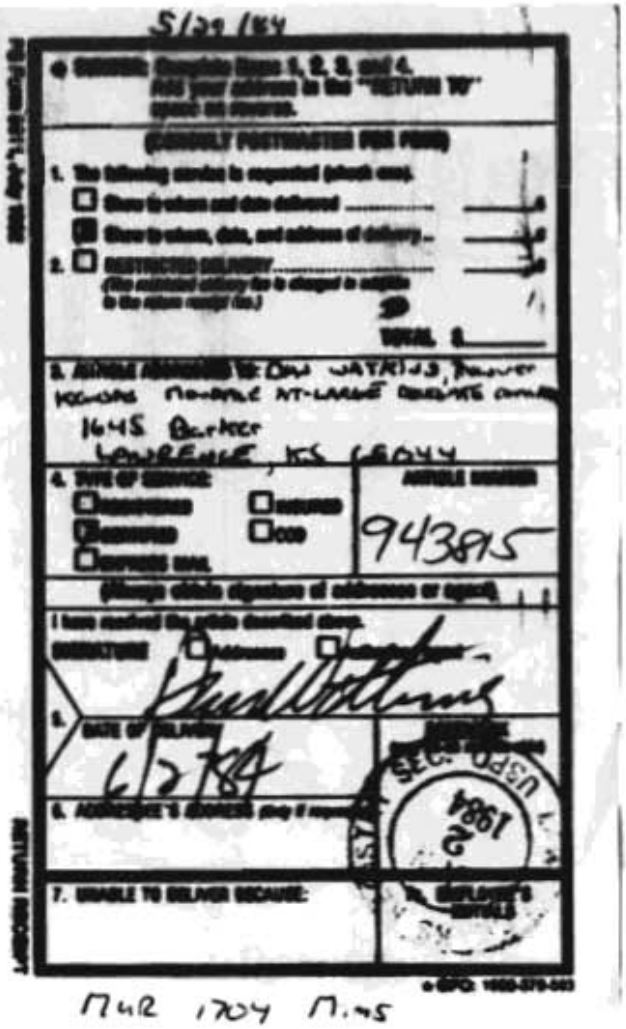


Mar 1704 M.75

3 5 7 4 0 3 9 1

3524032404037

5/29/84



MAR 1704 M.45

3 5 5 4 0 3 2 4 0 9 3

5/29/84

PS Form 3811, July 1983

● 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 above rate(s) fee.)

TOTAL ¢ ___

3. ARTICLE ADDRESSED TO: Thomas E Hollard, Jr., Treas
Mondale Delegate Team
EAST Court St
Doylestown, PA 18901

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

ARTICLE NUMBER
943874

(Always obtain signature of addressee or agent)

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

Joan A Nordell

5. DATE OF DELIVERY
6/4/84

POSTMARK
JUN 4 1984

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

8. EMPLOYEE'S INITIALS

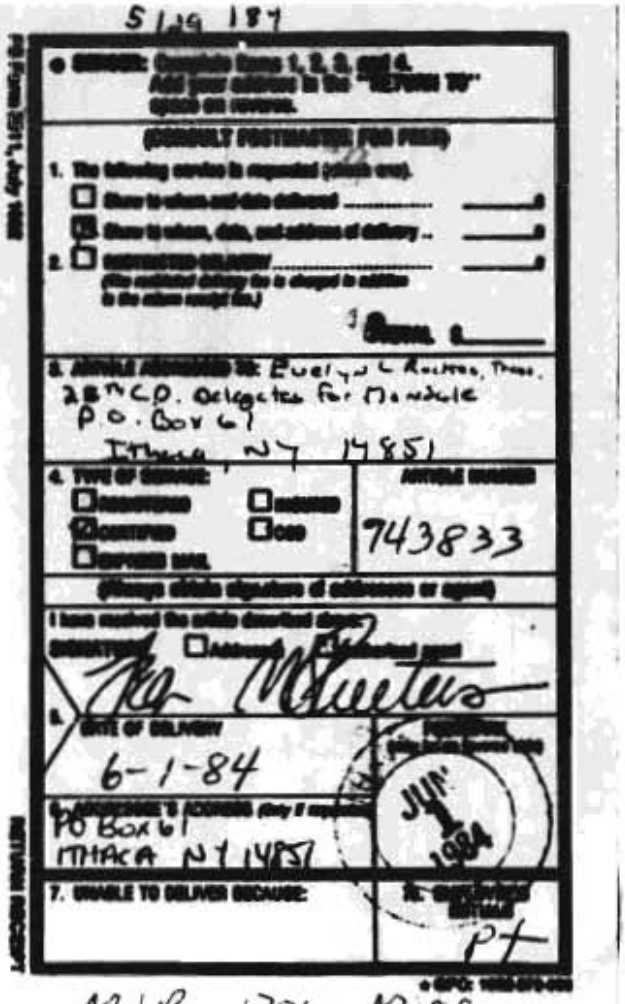
GPO: 1983-479-865

RETURN RECEIPT

MUR 1704 mine

3 5 5 4 3 5 5 4 0 9 7

Slip 187



M LIR 1704 MIMS

3 5 7 4 0 5 2 4 0 3 3

5/29/84

PS Form 3811, July 1983

- 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: Andrew J. Duncan, Executive Director
33rd Cong. Dist. Delegate Advisory Comm. Mtg.
1704 Camino Real #14
Palm Springs CA 92262

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

ARTICLE NUMBER: P 943778

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

X Andrew Duncan

5. DATE OF DELIVERY

POSTMARK

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

8. EMPLOYEE'S INITIALS

RETURN RECEIPT

GPO: 1983-376-865

1704 Mtg

3 5 2 4 0 5 2 4 0 3 7

5/29/84

● SERVICE: 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: Charles O. Dickey, Trust
c/o 4 Delegates for mandate
P.O. Box 668 3141 Hartland Blvd.
Orange City, FL. 32763

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

ARTICLE NUMBER: 943783

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE: ☐ Addressee ☐ Authorized agent

X [signature]

5. DATE OF DELIVERY: 4 June 84

POSTMARK: ORANGE CITY FL JUN 4 1984

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

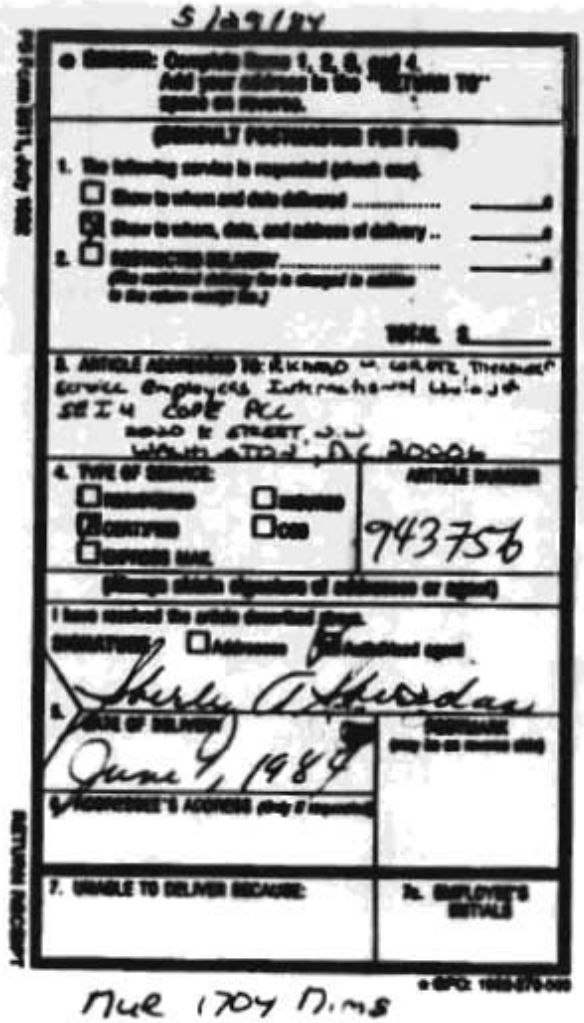
PS Form 3811, July 1983

GPO: 1983-370-865

MAR 1704 Mins

3 7 5 4 0 3 7 4 0 9 7

5/29/87



RETURN RECEIPT

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

(POSTAGE FURNISHED FOR FREE)

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: RICHARD W. GALVIN, Treasurer
   Service Employees International Union
   SEIU COPE PAC
   1800 H STREET, N.W.
   WASHINGTON, D.C. 20006

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

ARTICLE NUMBER: P 943756

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE: ☐ Addressee ☒ Authorized agent

X Shirley A. Hobdan

5. DATE OF DELIVERY: June 9, 1987

POSTMARK (may be on reverse side)

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

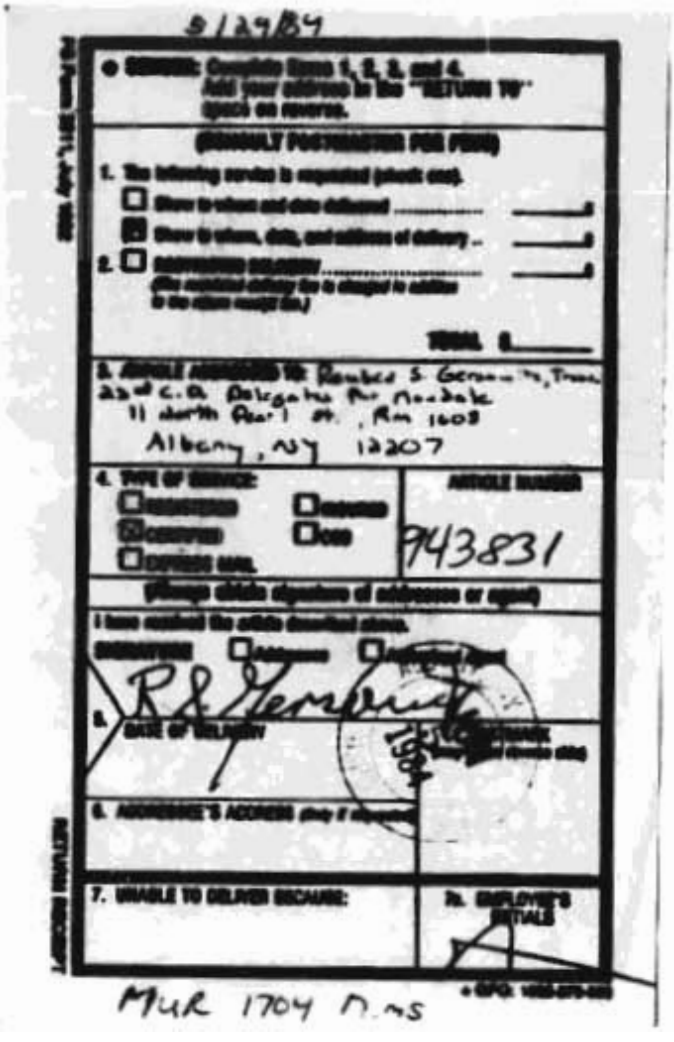
8. EMPLOYEE'S INITIALS

PS Form 3811, July 1983

GPO: 1983-376-865

Mur 1704 Dims

3 5 7 4 2 3 7 4 0 2 1



9/29/84

Ranked S. Germain, Treas.
23rd C.D. Delegates for Mondale
11 North Pearl St., Rm 1603
Albany, NY 12207

943831

R.S. Germain

MUR 1704 DNS

5) 29/84

PS Form 3811, July 1983

- 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 ..... ___ 1
   - ☒ Show to whom, date, and address of delivery .. ___ 1
2. ☐ RESTRICTED DELIVERY ..... ___ 2
   (The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $ ___

3. ARTICLE ADDRESSED TO: James R. Miller, Chairperson
   Mondale 14th CD Delegate Committee
   100-7 Alcott Place
   Bronx NY 10475

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

ARTICLE NUMBER: 943852

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

X James R. Miller

5. DATE OF DELIVERY

6. ADDRESSEE'S ADDRESS (Only if requested and fee paid)

7. UNABLE TO DELIVER BECAUSE:

8. SIGNATURE — ADDRESSEE'S AGENT

RETURN RECEIPT

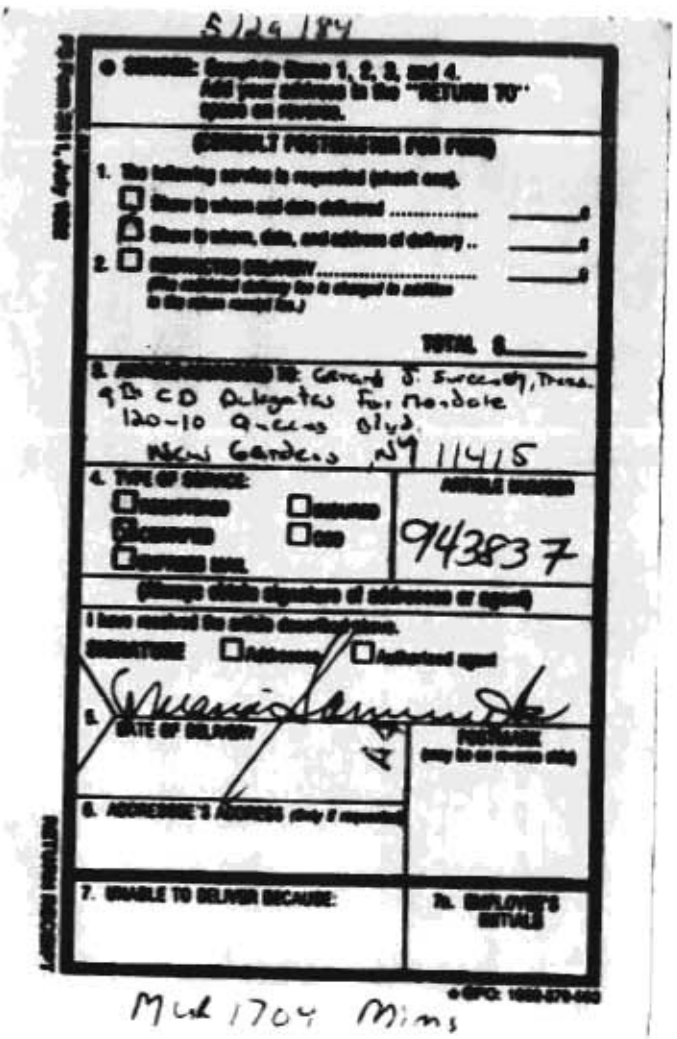
GPO: 1983-370-865

MAR 1704 4 mins

3 5 7 4 2 3 2 4 0 2 2

3 3 2 4 2 3 2 4 0 9 2 3

5/24/84



PS Form 3811, July 1983

● 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: Edward J. Sweeney, Treas.
9th CD Delegates for Mondale
120-10 Queens Blvd.
Kew Gardens NY 11415

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

ARTICLE NUMBER
P 943837

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY 4/27

POSTMARK (only to be used on reverse side)

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

8. EMPLOYEE'S INITIALS

GPO: 1983-376-865

DOMESTIC RETURN RECEIPT

Mail 1704 Mins

5/29/87

● 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 .. ____¢
- ☐ RESTRICTED DELIVERY ..... ____¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL ¢ ____

2. ARTICLE ADDRESSED TO: DOUGLAS C. BROOKS, TRUS
2150 CO. RTE 4, DELEGATES FOR MONDALE
2207 OAKWOOD CT
ERIE PA 16508

4. TYPE OF SERVICE:	ARTICLE NUMBER
☐ REGISTERED ☐ INSURED ☒ CERTIFIED ☐ COD ☐ EXPRESS MAIL	P 943865

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

X Donald R Brooks

5. DATE OF DELIVERY	POSTMARK (may be an adjacent date)
6-1-87	

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE: | 8. EMPLOYEE'S INITIALS

RETURN RECEIPT

* GPO: 1985-479-865

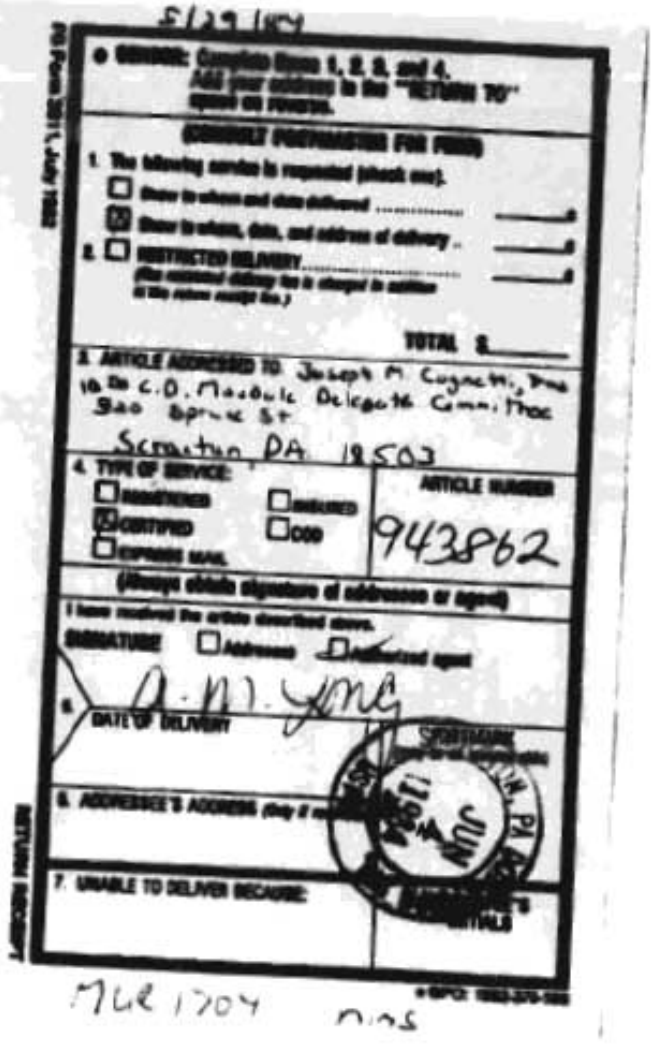
PS Form 3811, July 1983

MLR 1704 mms

3 5 2 4 0 3 4 0 9 2 1

3 3 2 4 0 2 7

5/29 IRC



MLR 1704 DNS

5/29/24

PS Form 3811, July 1992

- 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: Honorable C. Kathy Hochul
Erie County Delegates for Mondale
Stn 420 Delaware Ave
Buffalo NY 14202

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

ARTICLE NUMBER: 943844

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

X Laurie Lyster

5. DATE OF DELIVERY: 6/4/24

POSTMARK

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

8a. EMPLOYEE'S INITIALS

RETURN RECEIPT

• GPO: 1993-352-714

MUR 1704

3570 3274 0943

3 5 1 0 3 4 0 2 7

5/24/84

PS Form 3811, July 1983

● 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 above mailing fee.)

TOTAL ¢ ____

3. ARTICLE ADDRESSED TO: John P. Murphy, Treasurer
13th C.D. Dulgath Committee for President
11681 South Pulaski.
Alsip IL 60658

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

ARTICLE NUMBER
943798

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
X [signature]

5. DATE OF DELIVERY
6/1/84

POSTMARK
(may be on mailing side)

6. ADDRESSEE'S ADDRESS (Only if requested)
11601 S. PULASKI

7. UNABLE TO DELIVER BECAUSE:

8. [illegible]
USPO
522

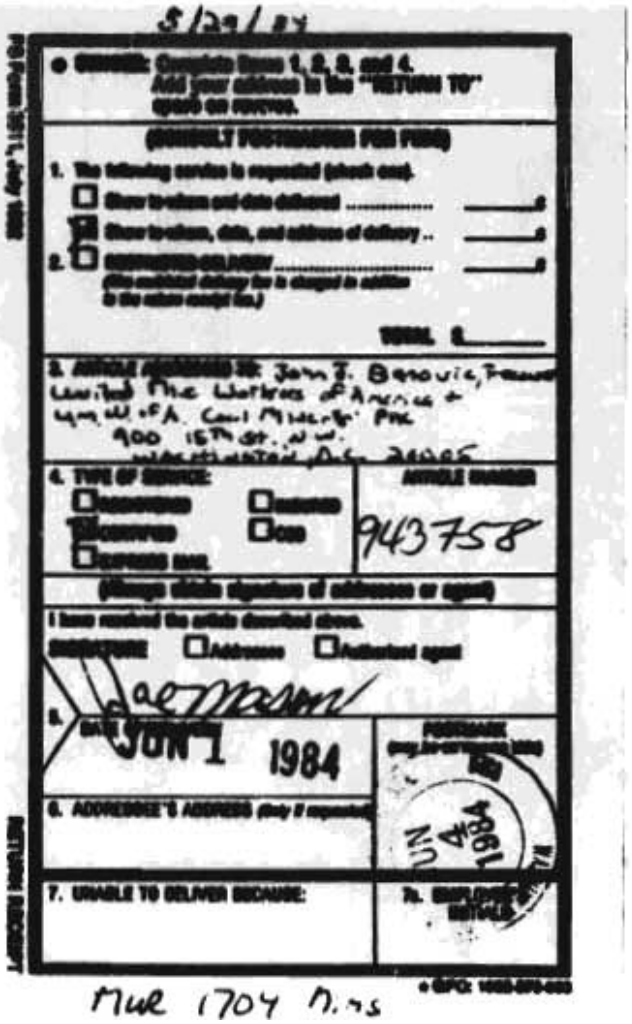
RETURN RECEIPT

* GPO: 1983-376-865

MUR 1704 Mine

3 5 7 4 0 3 7 4 0 9 3

5/29/84



Mur 1704 Mass

3 5 1 4 0 5 1 4 0 2 2

5/29/84

PS Form 3811, July 1983

- 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: Gerard S. Ziegler, Pres
NCO, Delegates For Nowak
3832 Grand Ave.
Allentown, PA. 18104

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

ARTICLE NUMBER: P 943877

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

Gerard Ziegler

5. DATE OF DELIVERY: JUN 4 1984

POSTMARK (may be on reverse side)

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

RESTRICTED DELIVERY'S INITIALS

RETURN RECEIPT

* GPO: 1983-370-865

Mue 1704

3 5 1 4 0 3 2 4 1 3 2

8/24/04

PS Form 3811, July 1999

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

(TO BE FILLED OUT BY 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: Louis B. Roscher, Treasurer
Communications Workers of America & CWA-CAPE PAC
501 3rd Street, N.W.
Washington, DC 20001

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

ARTICLE NUMBER: 943755

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

X Joseph L. Harrison Jr

DATE OF DELIVERY

POSTMARK (may be on reverse side)

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

8. EMPLOYEE'S INITIALS

RETURN RECEIPT

GPO: 1999-578-028

MAR 1704 11:45

3574030410!

5/29/84

PS Form 3811, July 1983

- **RETURN:** 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: Samuel C. Cotherman, Jr.
   Arlington Fed Mutual
   P.O. Box 4716
   1100 Century Blvd.
   Jacksonville, Fl 32211

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

   ARTICLE NUMBER: 943788

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

5. Samuel C Cotherman Jr

6. DATE OF DELIVERY: 6-2-84

7. ADDRESSEE'S ADDRESS (Only if requested)

8. UNABLE TO DELIVER BECAUSE:

8a. EMPLOYEE'S INITIALS

RETURN RECEIPT

* GPO: 1983-376-865

MAR 1704 Mins

3 5 3 4 0 3 0 4 1 3 2

6/29/84

PS Form 3811, July 1983

● 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: James L. Knight Jr, Pres.
C.D. #7 Outpatient Pre Parole
3405 Adline Ave.
Tampa FL 33611

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

ARTICLE NUMBER
943786

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
X James L Knight Jr

5. DATE OF DELIVERY

POSTMARK
(May be on reverse side)
JUN 1984

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

8. ADDRESSEE'S INITIALS

RETURN RECEIPT

GPO: 1983-379-000

MUR 1704 Mims

5/29/84

● 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: ALICE B. F. GARDEN, TEXAS
DEL. C.O. DELEGATES FOR MONDALE
2707 TOLBUT EXTET
PHILADELPHIA, PA. 19152

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

ARTICLE NUMBER
P43867

(Always obtain signature of addressee or agent)

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

Alice B. Garden

DATE OF DELIVERY
6-7-84

JUN 7 1984
PHILADELPHIA, PA.

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

POSTMARK OR DATE

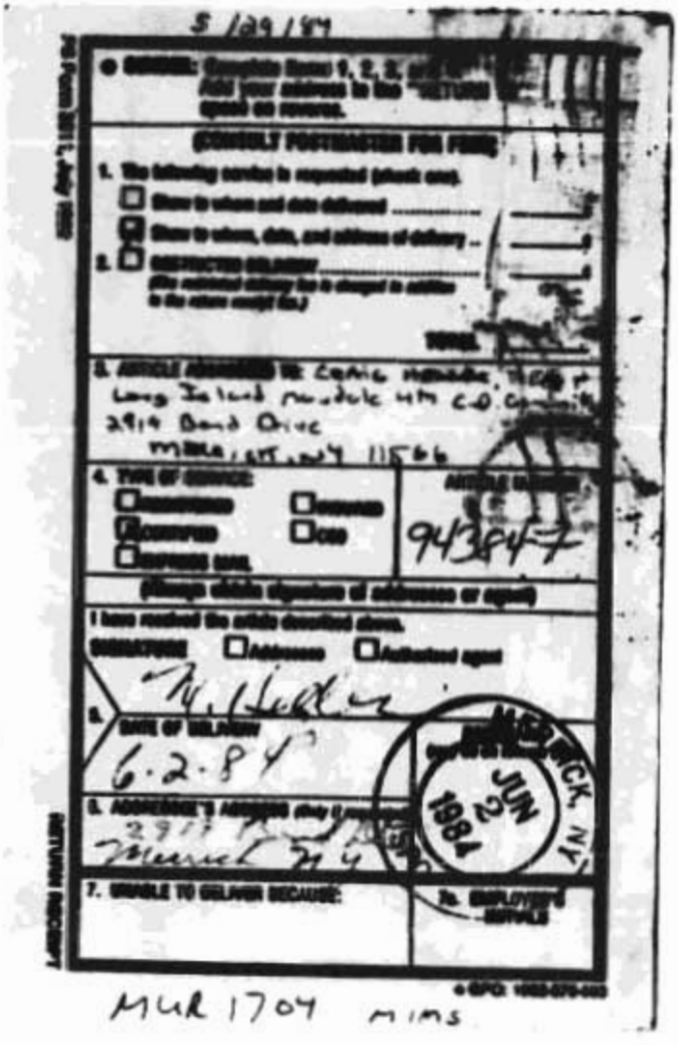
RETURN RECEIPT

PS Form 3811, July 1983

3 3 7 4 3 0 4 1 3 7

MAR 1704 MINI

3 3 2 4 2 3 0 4 1 2 1



MUR 1704 mims

3 3 7 4 2 3 2 4 1 3 7

5/29/94

SERVICE: 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 above except No.)

TOTAL $ ___

3. ARTICLE ADDRESSED TO: Steven D. Goldstein
   IDMCO Delegate for Mondale
   1551 East 22nd St
   Brooklyn, NY 11210

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

ARTICLE NUMBER: 943769

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

X BJ Hoffman

5. DATE OF DELIVERY

6 1984

USPO

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

8. EMPLOYEE'S INITIALS

GPO: 1988-270-865

RETURN RECEIPT

MUR 1704

5/29/84

PS Form 3811, July 1983

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

(EXTRA SOLT 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 above regular fee.)

TOTAL ¢ ____

3. ARTICLE ADDRESSED TO: DAVID T. CASTELLINE, JR.
ARIZONA HOUSING DEVELOPMENT COMMITTEE
826 N. Central Ave.
Phoenix AZ 85003

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

ARTICLE NUMBER
943774

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
JUN 4 1984

POSTMARK
JUN

6. ADDRESSEE'S ADDRESS (Only if requested)
826 N Central

7. UNABLE TO DELIVER BECAUSE:

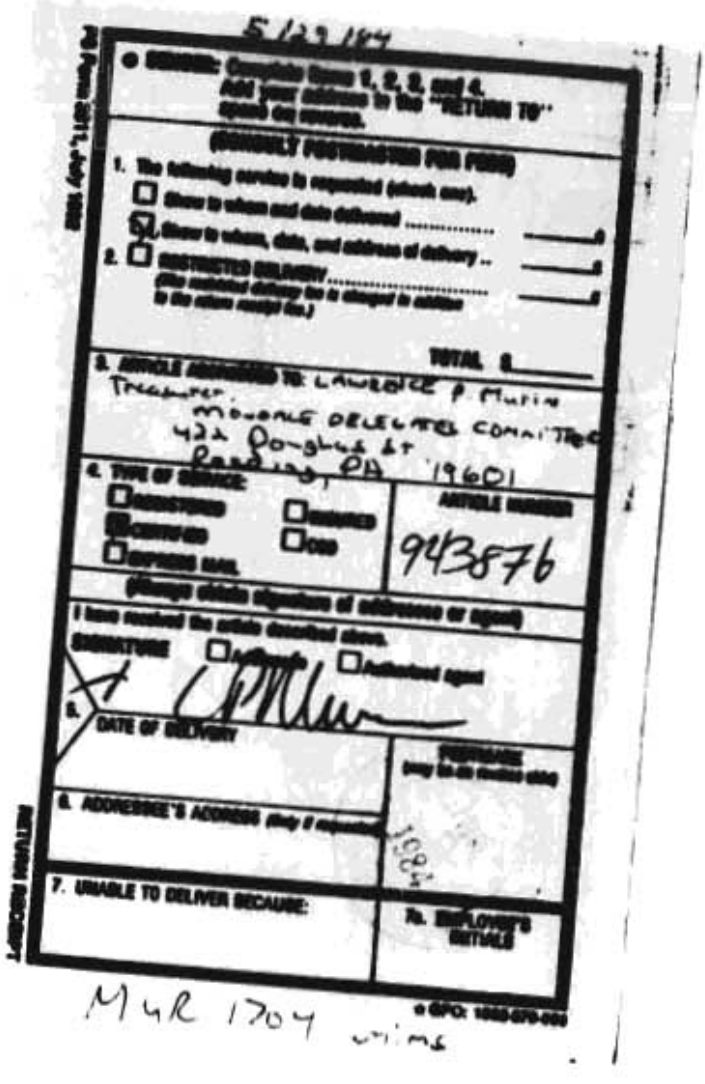
RETURN RECEIPT

GPO: 1983-370-865

MAR 1704 MNS

3 5 7 4 2 3 5 0 4 1 2 3

3 5 2 4 2 0 4 1 0 7



5/23/84

PS Form 3811, July 1983

- 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: LAWRENCE P Murin
   Treasurer
   MONONGALIA DELEGATES COMMITTEE
   422 Douglas St
   Fairmont PA 19601

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

ARTICLE NUMBER: 943876

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

X

6. DATE OF DELIVERY

POSTMARK (may be on reverse side)

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

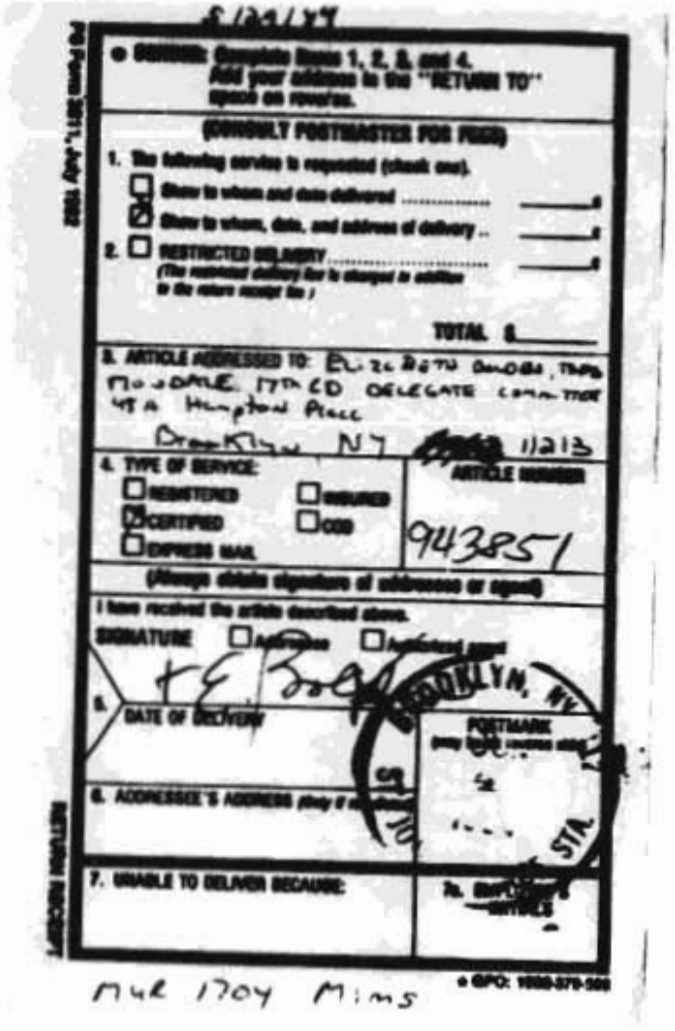
8. EMPLOYEE'S INITIALS

RETURN RECEIPT

GPO: 1983-370-000

M4R 1704 mins

3 3 3 3 3 3 4 1 0 3



PS Form 3811, July 1988

- 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 1
   - ☐ Show to whom, date, and address of delivery .. 2
2. ☐ RESTRICTED DELIVERY 3
   (The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $ ____

3. ARTICLE ADDRESSED TO: Elizabeth Gmoser, Treas. Mondale 17th CD Delegate Committee 48A Hampton Place Brooklyn NY 11213

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

ARTICLE NUMBER: P 943851

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

X E Bo[illegible]

5. DATE OF DELIVERY

POSTMARK

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

8. [illegible] INITIALS

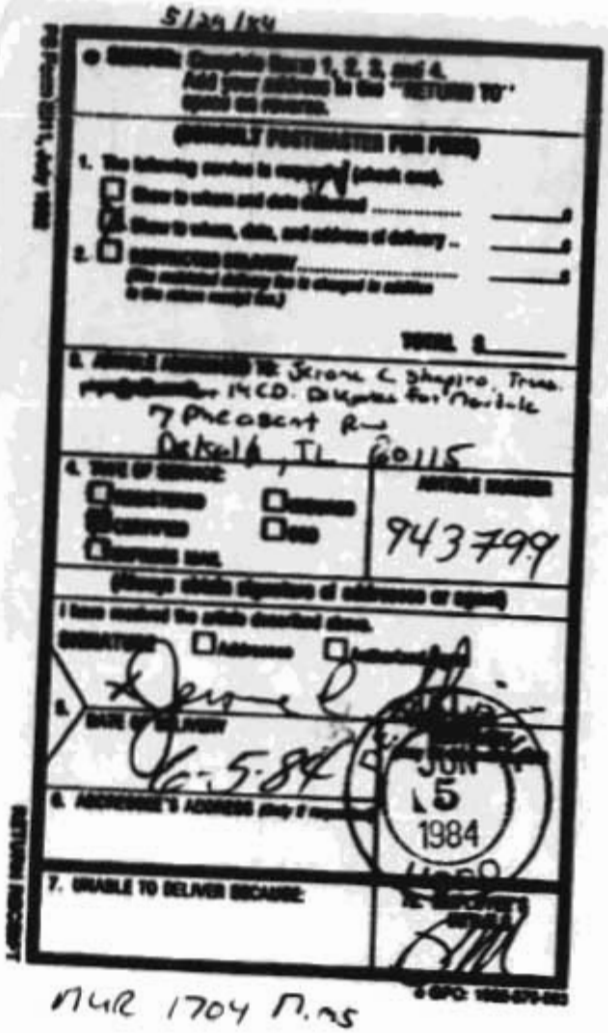
RETURN RECEIPT

GPO: 1988-270-865

Mar 1704 Mims

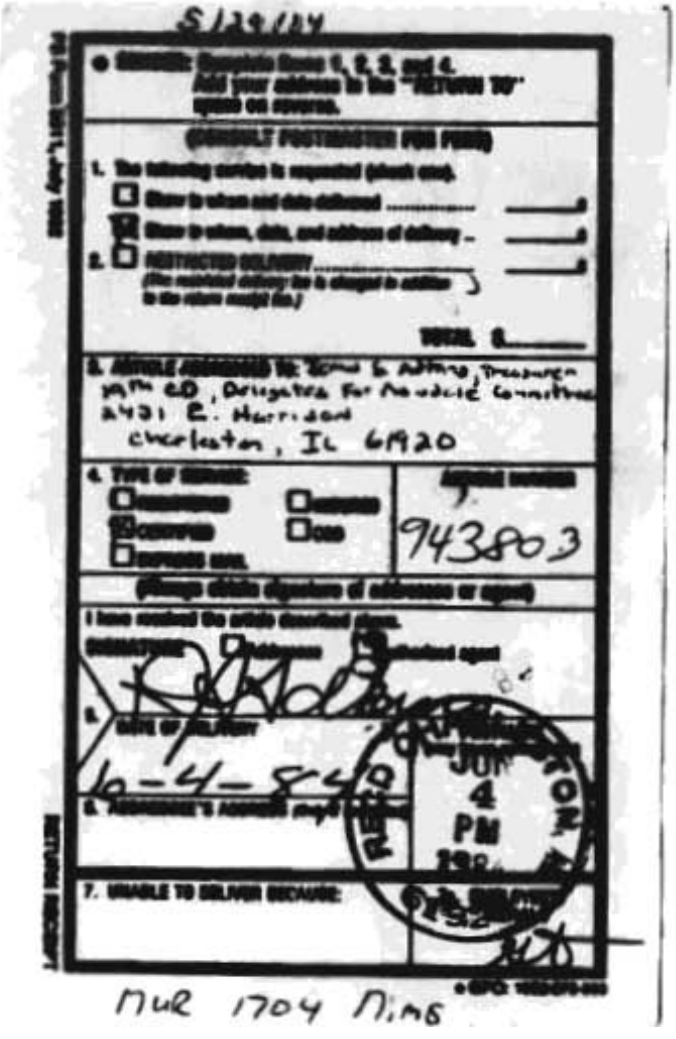
3 5 5 4 2 3 5 4 1 2 2

5/29/84



MHR 1704 M.NS

3 3 3 4 2 3 2 4 1 1 1 2



5/29/14

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 .. ___
   - ☐ RESTRICTED DELIVERY ..... ___
     (The restricted delivery fee is charged in addition to the return receipt fee.)
   - TOTAL $ ___

2. ARTICLE ADDRESSED TO: Bond & Adams Treasurer MPM CD, Delegates for Absolute Committee 2431 E. Harrison Charleston, IL 61920

4. TYPE OF SERVICE: ☐ REGISTERED ☐ INSURED ☐ CERTIFIED ☐ COD ☐ EXPRESS MAIL — ARTICLE NUMBER: 943803

(Always obtain signature of addressee or agent)

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

3. DATE OF DELIVERY: 6-4-14

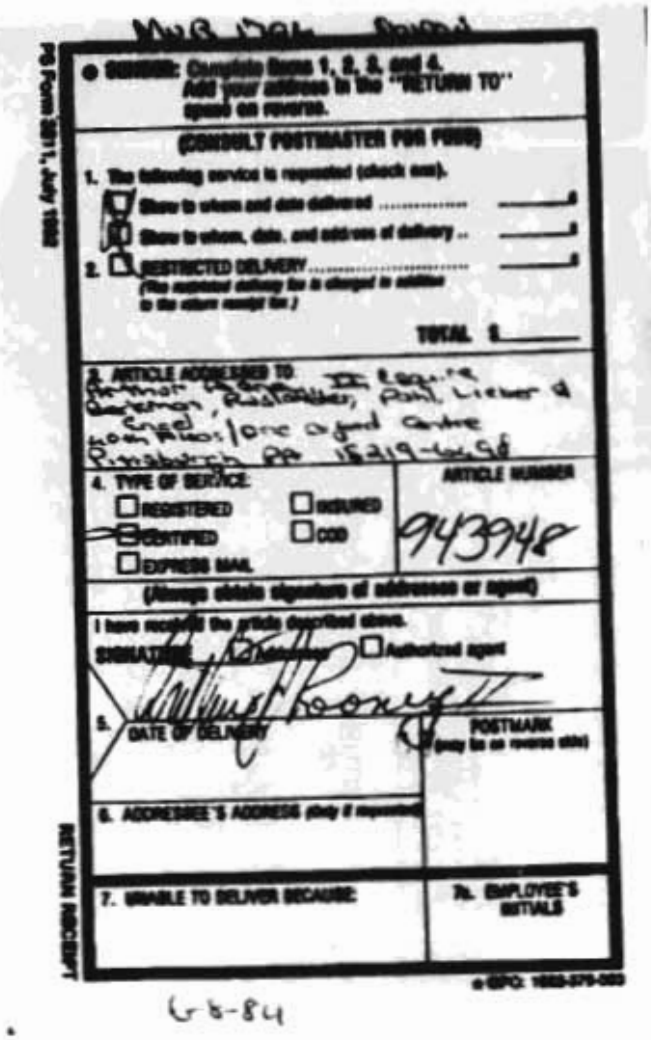
5. ADDRESSEE'S ADDRESS (Only if requested and fee paid)

RECEIVED JUN 4 PM 2014

7. UNABLE TO DELIVER BECAUSE:

STAMP

MUR 1704 Mins



PS Form 3811, July 1988

RETURN RECEIPT

- 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
Chairman, Postmaster, Post Master General
Washington DC 15219-6401

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

ARTICLE NUMBER: P 943948

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

5. DATE OF DELIVERY

POSTMARK (Affix to front of article)

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

8. EMPLOYEE'S INITIALS

GPO: 1988-570-000

6-8-84

3 5 3 4 3 5 3 0 4 1 1 1 1

3 3 3 0 3 3 2 4 1 1 2

$7.27 4.27

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 above rate(s).)

TOTAL ____¢

3. ARTICLE ADDRESSED TO: Philip A Ebersole, Press Delegate Committee, 16th CD, Apt 3 244 EAST ORANGE St LANCASTER, PA 17602

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

ARTICLE NUMBER: 943870

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

X Phil Ebersole

5. DATE OF DELIVERY

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

POSTMARK: LANCASTER PA JUN 23 1984 USPO

RETURN RECEIPT

PS Form 3811, July 1983

GPO 1983-376

MAR 1704 Min

5/23/24

PS Form 3811, July 1999

- **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: Lance Nicholas, Town of North Country Adirondack Park Agency 68 230 Rt. Glooversville, NY 12078

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

ARTICLE NUMBER: 943854

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

X Thomas Nicolella

4. DATE OF DELIVERY

POSTMARK (only to be affixed after)

5. ADDRESSEE'S ADDRESS (only if requested)

GLOVERSVILLE JUN

7. UNABLE TO DELIVER BECAUSE:

8. EMPLOYEE'S INITIALS

RETURN RECEIPT

MAL 1704 A.2

9 5 5 2 0 3 0 4 1 1 3

8 5 3 4 0 3 5 2 4 1 1 1 1

5/29/84

PS Form 3811, July 1983

● 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: Thomas R. Donahue, Treasurer
AFL, CIO and AFL-CIO COPE PAC
815 16th St., N.W.
WASHINGTON, D.C. 20006

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

ARTICLE NUMBER
943746

(Always obtain signature of addressee or agent)

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

X Janet Conna

5. DATE OF DELIVERY

POSTMARK
(may be an approximate date)

6. ADDRESSEE'S ADDRESS (Only if requested)

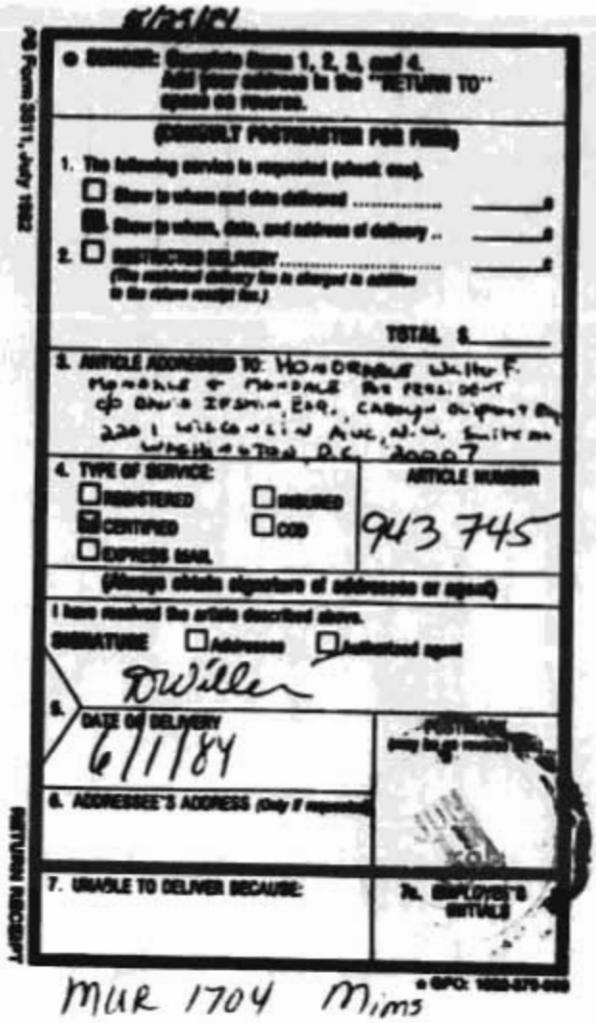
7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

RETURN RECEIPT

Mur 1704 M.M.S

3 3 3 3 3 3 4 1 1 5



PS Form 3811, July 1983

- 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 above rate(s).)

TOTAL $ ___

3. ARTICLE ADDRESSED TO: Honorable Walter F. Mondale c/o David Ifshin, Esq. 2201 Wisconsin Ave., N.W. Washington, D.C. 20007

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

ARTICLE NUMBER: 943745

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

D Willen

5. DATE OF DELIVERY: 6/11/84

POSTMARK

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

8. EMPLOYEE'S INITIALS

RETURN RECEIPT

GPO: 1983-379-000

MUR 1704 Mims

3 3 7 4 0 3 0 4 1 1 6

5/29/84

PS Form 3811, July 1983

● 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: Herman L Dammeyer, Pres
15th C.O. Delegate to Mandate
1407 Hanson Drive
Normal IL 61761

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

ARTICLE NUMBER
943806

(Always obtain signature of addressee or agent)

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

X Lucille A. Lee

5. DATE OF DELIVERY
6-1-84

POSTMARK
JUN 1 1984
NORMAL, IL

6. ADDRESSEE'S ADDRESS (Only if requested)
1407 HANSON
NORMAL IL 61761

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

RETURN RECEIPT

GPO: 1983-370-865

MUR 1704 N.25

3 5 7 4 0 3 0 4 1 1 7

5/23/84

PS Form 3811, July 1983

● 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: Jeffrey George, Treas.
17 Mt. Ont. Nordale Ochurch Comm.
445 Catalina Avenue
Youngstown, OH 44504

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

ARTICLE NUMBER
943858

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
6-1-84

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

YOUNGSTOWN, OH JUN 1984

RETURN RECEIPT

GPO: 1983-376-

MHR 1704

3 5 7 4 0 3 2 4 1 1 8

5/29/84

PS Form 3811, July 1983

● RETURN: 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: Joseph P. Mustin, Esq.
Mondale 13th Delegate Committee
12th Floor Packard Bldg.
Philadelphia, PA 19102

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

ARTICLE NUMBER: P 943872

(Always obtain signature of addressee or agent)

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

Lois Pickerson

6. DATE OF DELIVERY: 6/1/84

7. POSTMARK (may be on reverse side)

8. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

RETURN RECEIPT

GPO: 1983-375-000

Mud 1704 mine

3 5 7 4 2 5 2 4 1 1 1 2

5/29/84

PS Form 3811, July 1983

● 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: Art Rooney, II Trans. PA I&D Corp Dist., Delaware Riv. Marshall Oxford Ctr. 420 A. Pittsburgh, PA 15219

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

ARTICLE NUMBER
943879

(Always obtain signature of addressee or agent)

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

6. DATE OF DELIVERY
6-1-84

JUN 1 1984

5. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

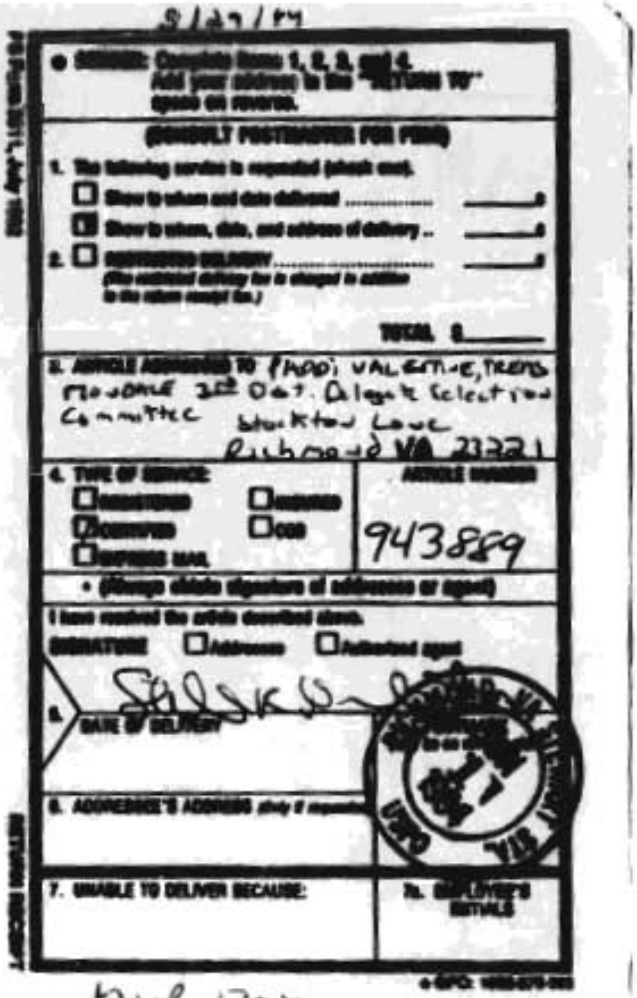
8. POSTMASTER

RETURN RECEIPT

GPO: 1983-376-530

MHR 1704 M.MS

9/27/84



MUR 1704

5/23/84

PS Form 3811, July 1983

● 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: John T. Taylor, Treasurer
Int. Assn. of Bridge, Struct. & Ornamental
Ironworkers, Structural Workers' League
1750 N.Y. Ave., N.W.
Washington, D.C. 20006

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

ARTICLE NUMBER
94B752

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
5/31/84

POSTMARK
(only if no receipt date)

6. ADDRESSEE'S ADDRESS (Only if requested)
1750 N.Y. Ave. N.W.
Washington DC 20006

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

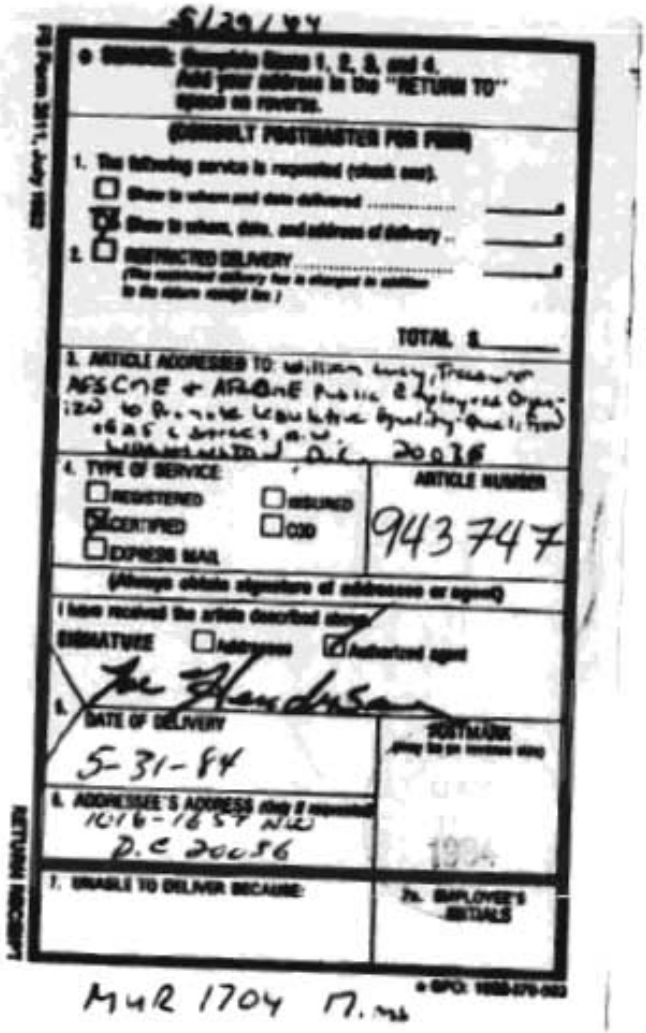
RETURN RECEIPT

GPO: 1983-376-865

MUR 1704 Mims

3 7 3 2 4 1 2 1

3 3 7 4 0 3 7 4 1 2 2



5/29/84

PS Form 3811, July 1983

• 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: William Lucy, Treasurer
AFSCME & AFSCME Public & Employee Organization to Promote Legislative Equality-Fund (PEOPLE)
1625 L Street, N.W.
Washington, D.C. 20036

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

ARTICLE NUMBER: P 943747

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☒ Authorized agent

Joe Henderson

5. DATE OF DELIVERY: 5-31-84

POSTMARK

6. ADDRESSEE'S ADDRESS (Only if requested)
1016-16th St NW
D.C 20036

1984

7. UNABLE TO DELIVER BECAUSE:

8. EMPLOYEE'S INITIALS

RETURN RECEIPT

• GPO: 1983-370-865

MUR 1704 M.

3 5 7 4 1 2 3 4 1 2 3

6/20/84

PS Form 3811, July 1983

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

(ADDITIONAL POSTMASTER FEE FOR)

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: Robert L Porter, Treasurer
American Federation of Painters & Allied Trades
11 Dupont Circle, N.W.
Washington, D.C. 20036

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

ARTICLE NUMBER: P 943748

(Always obtain signature of addressee or agent)

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

5. X Ug Hume

6. DATE OF DELIVERY: JUN 6 1984

7. ADDRESS'S ADDRESS (ONLY if requested and fee paid)

8. UNABLE TO DELIVER BECAUSE:

POSTMASTER'S INITIALS

RECEIPT FOR CERTIFIED MAIL

DC 64 JUN 1 1984 SEC. 2

1704

Mail 1704 M.NS

3 7 7 4 3 3 2 4 1 2 1

5/29/84

PS Form 3811, July 1988

● 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: Donna A. McWilliams Dem.
17th LD Republic Delegate Comm. Elec
400 Rock Island Oak Ridg.
P.O. Box 424
ROCK ISLAND, IL 61201

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

ARTICLE NUMBER
943802

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
JUN - 1 1984

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

8. EMPLOYEE'S INITIALS

POSTMARK

ROCK ISLAND

RETURN RECEIPT

GPO: 1988-212-865

MUR 1704 M.ms

3 5 7 4 2 3 5 0 4 1 2 7

5/29/84

PS Form 3811, July 1983

- 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 above applicable fee.)

TOTAL ¢ ____

3. ARTICLE ADDRESSED TO: FINEY BELIEF AWARD 1984 DELEGATES FOR FINDALE-ENG/RICHMOND IMM LD 157 ARDLOTT AVE STATEN ISLAND, NY 10306

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

ARTICLE NUMBER: 943842

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

8. M E Hampton

9. DATE OF DELIVERY: 6/1/84

10. ADDRESSEE'S ADDRESS (Only if requested)

11. UNABLE TO DELIVER BECAUSE:

12. POSTMASTER'S

RETURN RECEIPT

NHR 1704 Nims

5/29/84

PS Form 3811, July 1983

● SERVICES: 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: William H. Taylor, II, Treasurer
7th C.D., Delegates Reconsidered
One IBM Plaza, Suite 4700
Chicago, IL 60611

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

ARTICLE NUMBER
943806

(Always obtain signature of addressee or agent)

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

D. Williams

5. DATE OF DELIVERY
6-1-84

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

CHICAGO, ILL. JUN 1 1984

RETURN RECEIPT

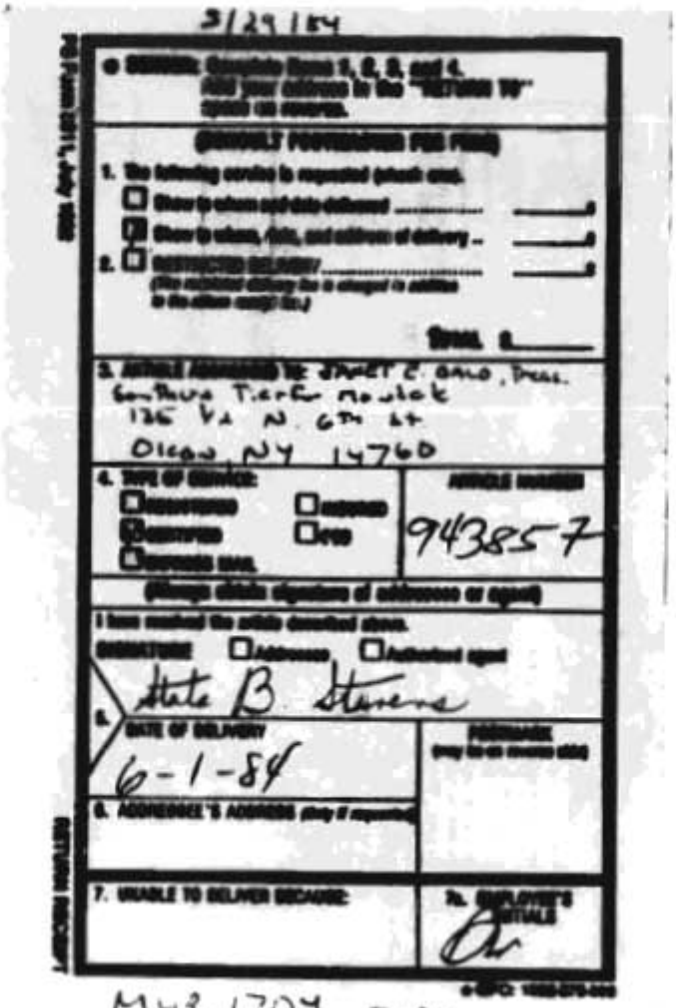
GPO: 1983-379-865

Mar 1704 M.25

3 5 7 4 7 3 7 4 1 2 3

3529504127

5/29/84



● RESTRICTED DELIVERY

2. ARTICLE ADDRESSED TO: JANET C. GALO, Pres.
Genesee Tierra Norte
136 Va N. Gen St
Olean NY 14760

4. TYPE OF SERVICE: ☐ Registered ☐ Insured ☒ Certified ☐ COD ☐ Express Mail
ARTICLE NUMBER: 943857

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
X State B Stevens

5. DATE OF DELIVERY: 6-1-84

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

8. EMPLOYEE'S INITIALS

M42 1704 n.m.

3 3 7 4 0 3 0 4 1 2 3

5/29/84

PS Form 3811, July 1983

● 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: LOUANN SHRADER TRUE
19th CD Delegate & Mondale Comm.
RD 5 Box 259 Oakhill Drive
Hanover, PA 17331

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

ARTICLE NUMBER
943864

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
6-2-84

POSTMARK
(may be an enclosed date)

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

RETURN RECEIPT

★ GPO: 1983-479-000

MGR 1704 mns

3 5 7 4 0 3 2 4 1 2 9

5/23/84

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: Anthony Luthy, Treasurer
United Food & Commercial Workers, #
4 Focus Potomac Ballot Club
1775 K. Street N.W.
Washington, D.C. 20006

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

ARTICLE NUMBER: 943749

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☑ Authorized agent

6. DATE OF DELIVERY: MAY 31 1984

POSTMARK (may be on reverse side)

7. ADDRESSEE'S ADDRESS (only if requested)

8. UNITED FOOD & COMMERCIAL
K STREET, N.W.
SHINGTON, D.C. 20006

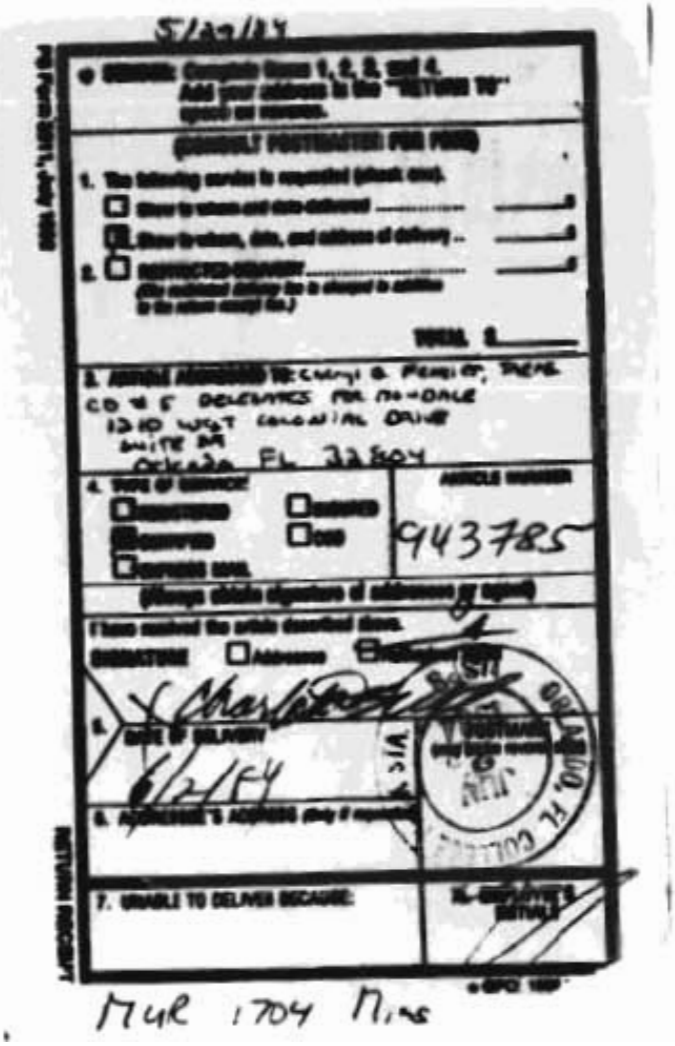
POSTAL EMPLOYEE'S INITIALS

PS Form 3811, July 1982

★ GPO: 1983-370-865

Mail 1704 M.-E

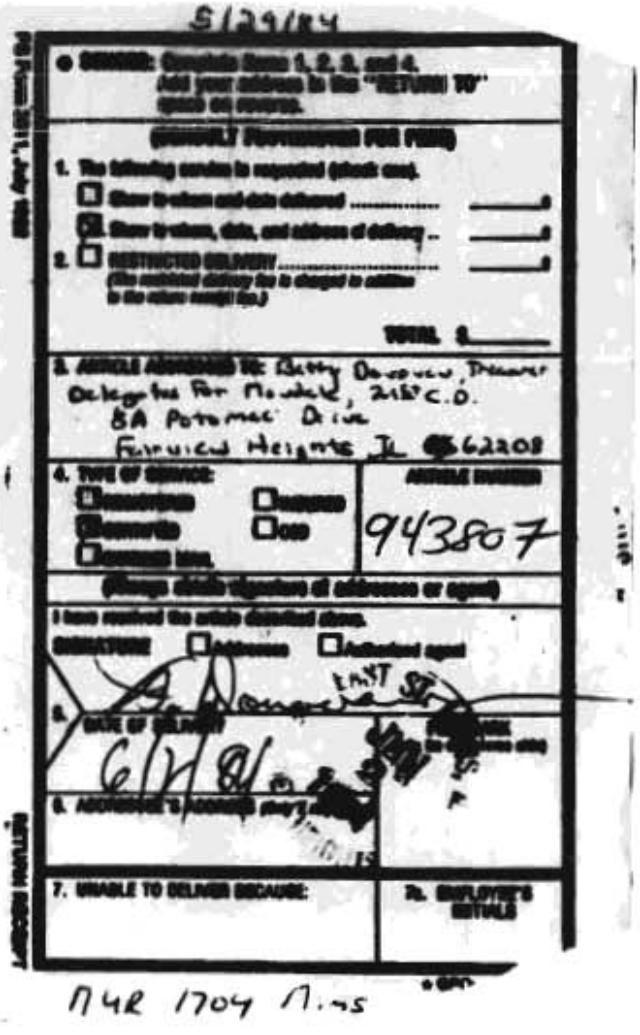
3 3 7 4 3 3 7 4 1 3 7



Mar 1704 Mins

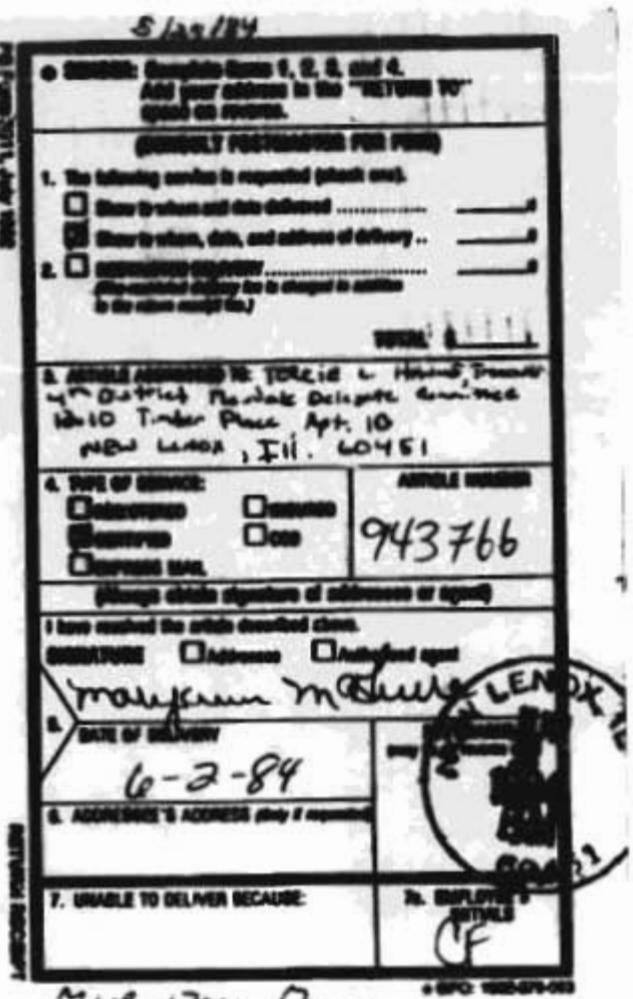
3 7 9 2 3 2 4 1 3 1

5/29/84



MAR 1704 11.45

5/29/84



● 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: Teresa L. Haines, Democratic 4th District Florida Delegate Committee
No. 10 Timber Place, Apt. 10
New Lenox, Ill. 60451

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

ARTICLE NUMBER
943766

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
6-2-84

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

8. EMPLOYEE'S INITIALS
CF

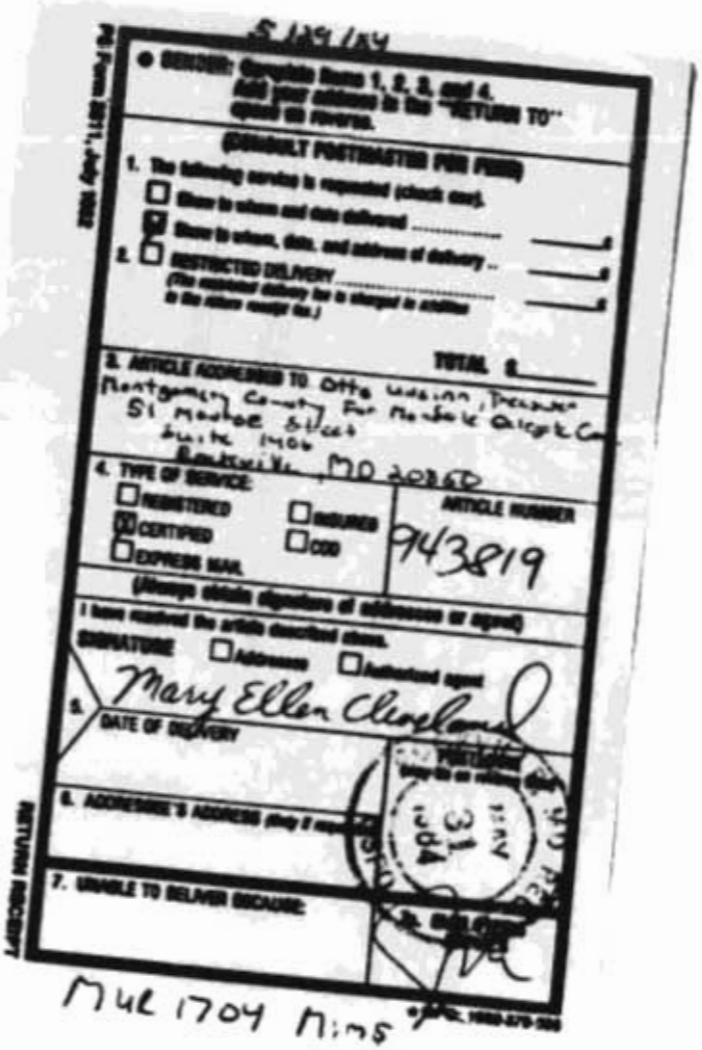
PS Form 3811, MAY 1980

ADDITIONAL INFORMATION

● GPO: 1982-370-865

MUR 1704 11.ms

3 7 : 1 2 : 2 4 1 3 2


S 129 184
PS Form 3811, July 1992
RETURN RECEIPT
Montgomery County For Nextel Airgate Co
51 Monroe Street
Suite 1406
Rockville, MD 20850
4. TYPE OF SERVICE:
REGISTERED
INSURED
CERTIFIED
COD
EXPRESS MAIL
ARTICLE NUMBER
943819
Mary Ellen Cleveland
DATE OF DELIVERY
POSTMARK
NOV 31 1994
ADDRESSEE'S ADDRESS
7. UNABLE TO DELIVER BECAUSE:
Mul 1704 Mins

3 3 1 4 2 3 4 1 3 3

3 5 7 4 2 3 2 4 1 3 1

5/29/84

PS Form 3811, July 1983

● 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: PATRICIA THALHUBER, Pres.
15th District Delegate to Republic Committee
3445 Maryland
Wayne, MI 48184

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

ARTICLE NUMBER
943825

(Always obtain signature of addressee or agent)

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

X

5. DATE OF DELIVERY
6-1-84

6. ADDRESS (Complete only if requested)
3445 Maryland
Wayne, MI

7. UNABLE TO DELIVER BECAUSE:

DELIVERY'S INITIALS

RETURN RECEIPT

GPO 1983-370-865

MUR 1704 Mims

5/29/84

PS Form 3811, July 1983

● 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 above except fee.)

TOTAL $____

3. ARTICLE ADDRESSED TO Thomas C Slater Jr.
6th Dist Delegate for Frederick
#8 Thomas Johnson Drive #10
Frederick, MD 21701

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

ARTICLE NUMBER
943823

(Always obtain signature of addressee or agent)

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

DATE OF DELIVERY
5/31

POSTMARK

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

FREDERICK MD 1984 31 US

RETURN RECEIPT

● GPO: 1983-370-865

Mail 1704 Mins

3 3 7 4 2 3 9 4 1 3 7

3 3 7 4 2 3 7 4 1 3 5

5/29/84

PS Form 3811, July 1983

● 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: Ann M. Yarborough
Treas. Arlington Murdock Olympic Committee
5140 N. 37th St.
Arlington, VA 22207

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

ARTICLE NUMBER
943888

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
X Richard W. Yarborough

5. DATE OF DELIVERY
MAY 31 1984

6. ADDRESSEE'S ADDRESS (Only if requested)

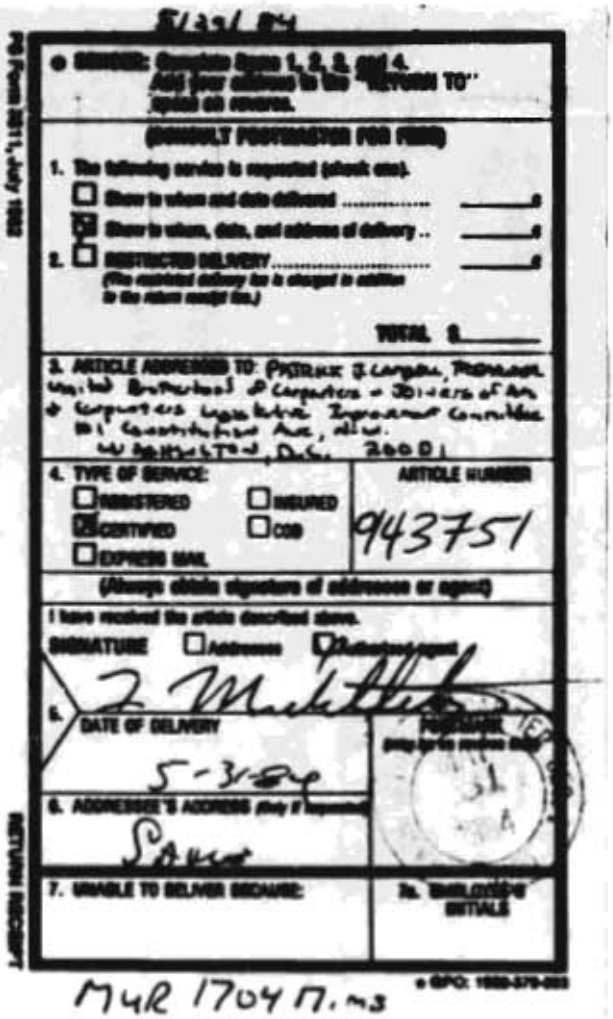
7. UNABLE TO DELIVER BECAUSE:

8. EMPLOYEE'S INITIALS

RETURN RECEIPT

• GPO: 1983-379-833

Myl 1704 M.M.S



5/23/84

PS Form 3811, July 1983

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

(ADDITIONAL POSTMASTER FEES 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: PATRICK J. LANGAN, TREASURER, United Brotherhood of Carpenters + Joiners of Am. + Carpenters Legislative Improvement Committee 101 Constitution Ave., N.W. Washington, D.C. 20001

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

ARTICLE NUMBER
943751

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
5-3-84

POSTMARK

6. ADDRESSEE'S ADDRESS (Only if requested)
Same

7. UNABLE TO DELIVER BECAUSE:

8. EMPLOYEE'S INITIALS

RETURN RECEIPT

GPO: 1983-379-853

M4R 1704 M.M3

3 5 4 0 3 0 4 1 3 7

5/29/84

PS Form 3811, July 1983

- 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: Helen Russell Allegood, Treasurer
   c/o Bill Reid Dodging Formosa
   1203 Rolling Road
   Greensboro, NC 27403

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

   ARTICLE NUMBER: 943827

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

X Helen Allegood

6. DATE OF DELIVERY

JUN 4 1984

5. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

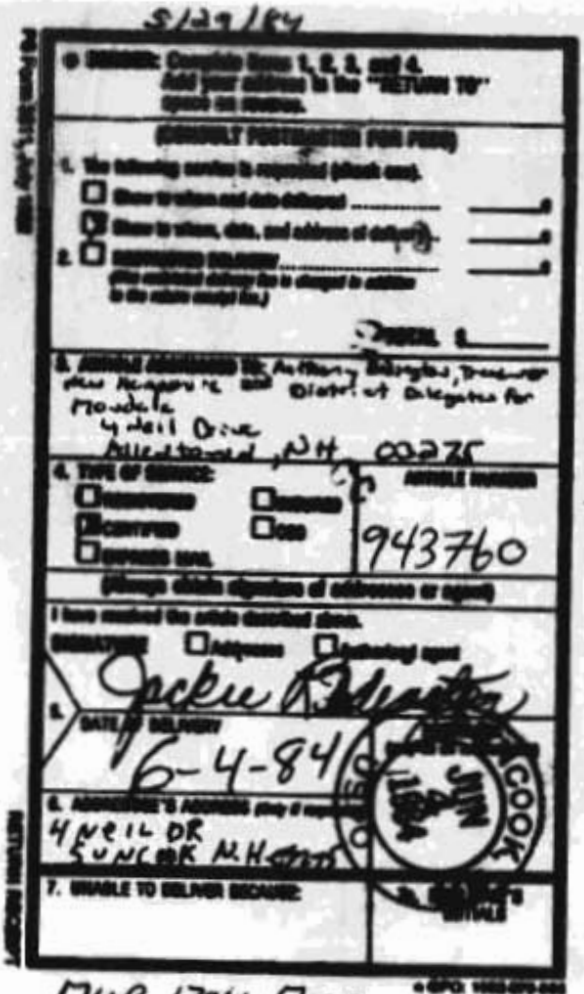
RETURN RECEIPT

PS Form 3811, July 1983

MR 1704 Mins

3 3 7 4 0 3 2 4 1 3 2

5/29/84



6-4-84

4 NEIL DR
SUNCOOK N.H.

943760

MUR 1704 M.45

3 7 2 4 2 3 0 4 1 4 2

6/29/04

PS Form 3811, July 1999

● 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: Angelique C. Earl, Treasurer
DC 16th District Module
11621 N.W. 25th Street
Pembroke Pines, FL 33026

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

ARTICLE NUMBER
943790

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY

6. ADDRESSEE'S ADDRESS (Only if requested and fee paid)

7. UNABLE TO DELIVER BECAUSE:

HOLLYWOOD, FL PEMBROKE PINES BR.

RETURN RECEIPT

Mue 1704 Mins

3 7 7 1 0 0 4 1 4 1

5/29/84

PS Form 3811, July 1983

- 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: Lenore F. Wilson, Treas. 3rd CD. Dirksen for Senate 4312 West 107th Place Oak Lawn, IL 60453

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

ARTICLE NUMBER: 943814

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

Lenore F. Wilson

5. DATE OF DELIVERY: 6-4-84

6. ADDRESSEE'S ADDRESS (Only if requested): 4312 W. 107th Pl

7. UNABLE TO DELIVER BECAUSE: 8. EMPLOYEE'S INITIALS

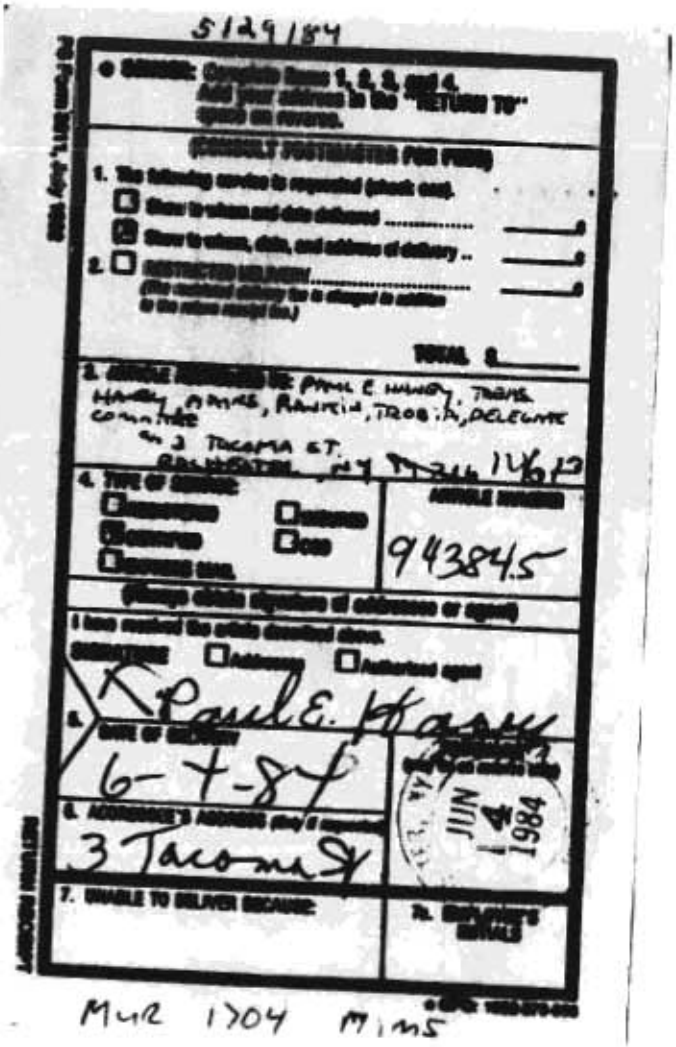
USPO 1984

RETURN RECEIPT

MUR 1704 Mims

3324092041442

5129/84



MUR 1704 MMS

3 5 3 4 0 5 0 4 1 4 3

5/29/84

PS Form 3811, July 1983

● 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: Stephen J. Wing, Treasurer
21st District Friends of Newbold Delegates
94 Market St. PO Box 910
Poughkeepsie, NY 12602

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

ARTICLE NUMBER: P 943829

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☒ Authorized agent

X

8. DATE OF DELIVERY

POSTMARK (or date stamp)

JUN 4 1984

9. ADDRESSEE'S ADDRESS (Only if requested and fee paid)

7. UNABLE TO DELIVER BECAUSE:

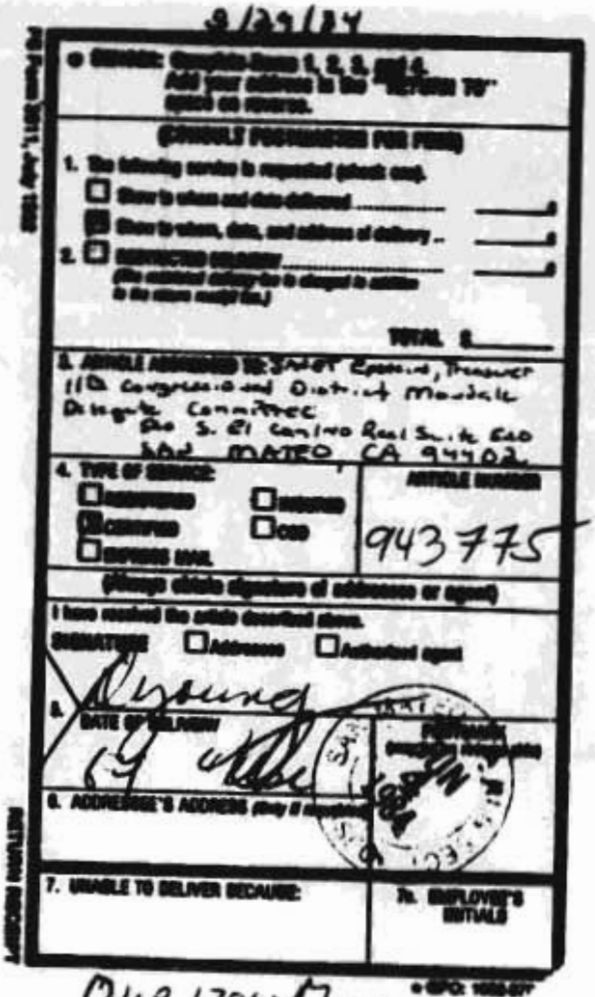
CLERK'S INITIALS

RETURN RECEIPT

☆ GPO: 1983-376-865

Mail 1704 Mins

9/29/84



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

(CHOOSE 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: Robert Espinosa, Treasurer
11th Congressional District Mondale
Delegate Committee
200 S. El Camino Real Suite 610
San MATEO CA 94402

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

ARTICLE NUMBER
943775

(Always obtain signature of addressee or agent)

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

DATE OF DELIVERY
9 Oct

POSTMARK

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

8. EMPLOYEE'S INITIALS

ADDITIONAL INFORMATION

• GPO: 1983-377

Mar 1704 Mins

3 5 7 4 2 5 2 4 1 4 1

5 / 27 / 84

PS Form 3811, July 1983

- **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: Amy Gross Brouwer
   6th CD Delegates for Mondale
   92-03 Rockaway Beach Blvd.
   Rockaway Beach NY 11693

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

ARTICLE NUMBER: P 943834

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

X

5. DATE OF DELIVERY

POSTMARK (may be on reverse side)

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

8. EMPLOYEE'S INITIALS

RETURN RECEIPT

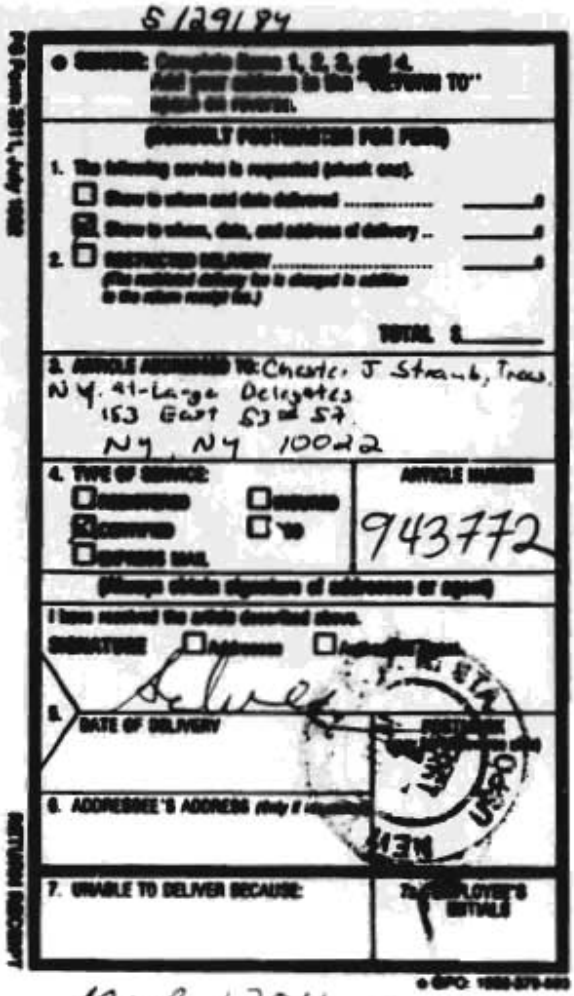
* GPO: 1983-376-865

Mur 1704 M. Ms.

P 943 834 145

3 5 7 4 2 3 0 4 1 4 5

8/29/84



PS Form 3811, July 1983

● 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: Charles J Straub, Treas.
   N.Y. At-Large Delegates
   153 East 53rd St.
   NY, NY 10022

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

ARTICLE NUMBER: P 943772

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized Agent

5. DATE OF DELIVERY

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

RETURN RECEIPT

● GPO: 1983-379-865

Mur 1704 mms

3 7 7 4 3 3 2 4 1 4 7

$12.5(E)

PS Form 3811, July 1983

- 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 above receipt fee.)

TOTAL ¢ ____

3. ARTICLE ADDRESSED TO: Georgia E. Trevino, Pres
   IECA Delegate for Water Pollution
   9401 S. Michigan Ave
   Chicago, IL 60619

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

ARTICLE NUMBER: 943804

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE: ☐ Addressee ☐ Authorized agent

X G. Trevino

5. DATE OF DELIVERY

CHICAGO, IL BRANCH JUN 2 1984 STATION

6. ADDRESSEE'S ADDRESS (Only if requested and fee paid)

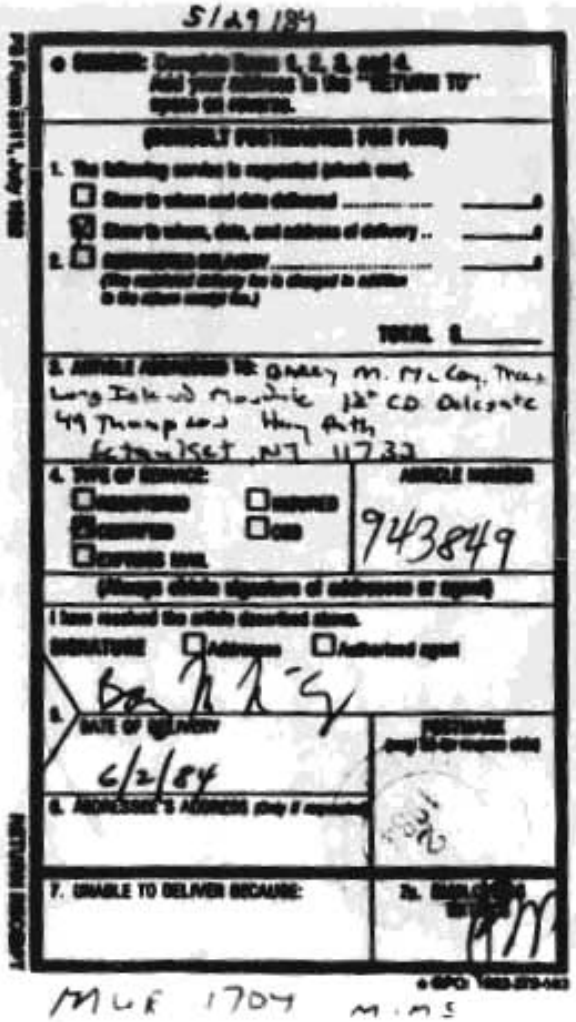
7. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

RETURN RECEIPT

GPO: 1983-376-865

Mail 1704 Mine

5/29/84



- 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 above charge(s).)

TOTAL ¢ ____

3. ARTICLE ADDRESSED TO: Gary M. McCoy, Mgr. Long Island Mobile 12th CD Alcoate 49 Thompson Hwy Attn Setauket NY 11733

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

ARTICLE NUMBER: 943849

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

X [signature]

5. DATE OF DELIVERY: 6/2/84

POSTMARK (only for registered mail)

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

8. [illegible]

PS Form 3811, July 1983

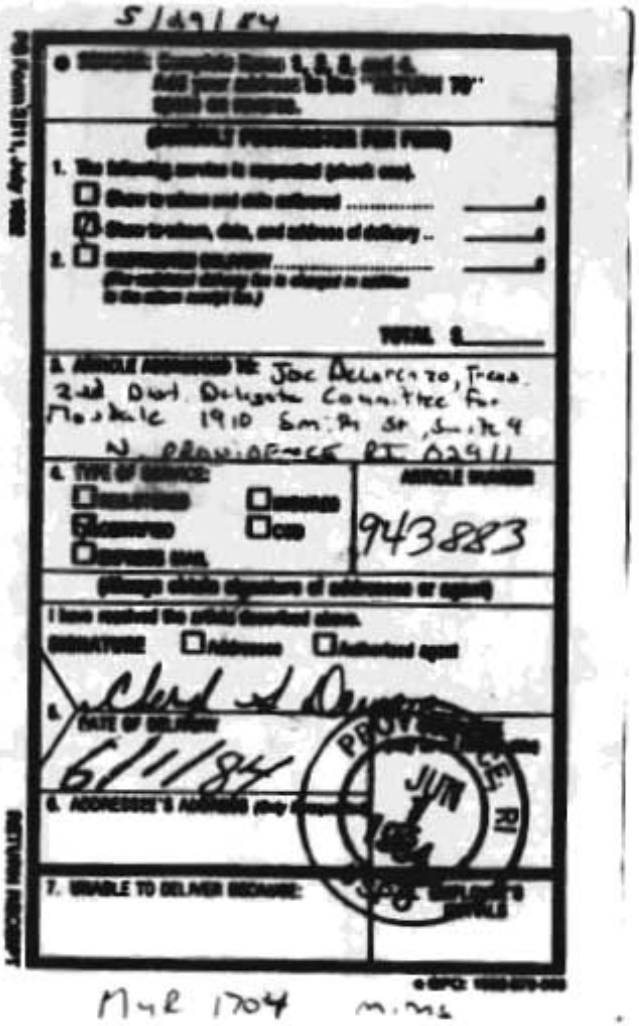
GPO [illegible]

MLE 1704 M.M.S

3 [illegible] 4 1 [illegible]

3 3 7 4 0 3 7 4 1 4 2

5/29/84



Mail 1704 M.M.

3 5 7 4 0 5 2 4 1 3 2

9/29/94

PS Form 3811, July 1992

● 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: Kathleen Smith, Treas.
Nowak Delegates - 20th District
1022 S. Braddock Ave.
Pittsburgh PA 15218

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

ARTICLE NUMBER
943875

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY

POSTMARK
PA JUN 29 94

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

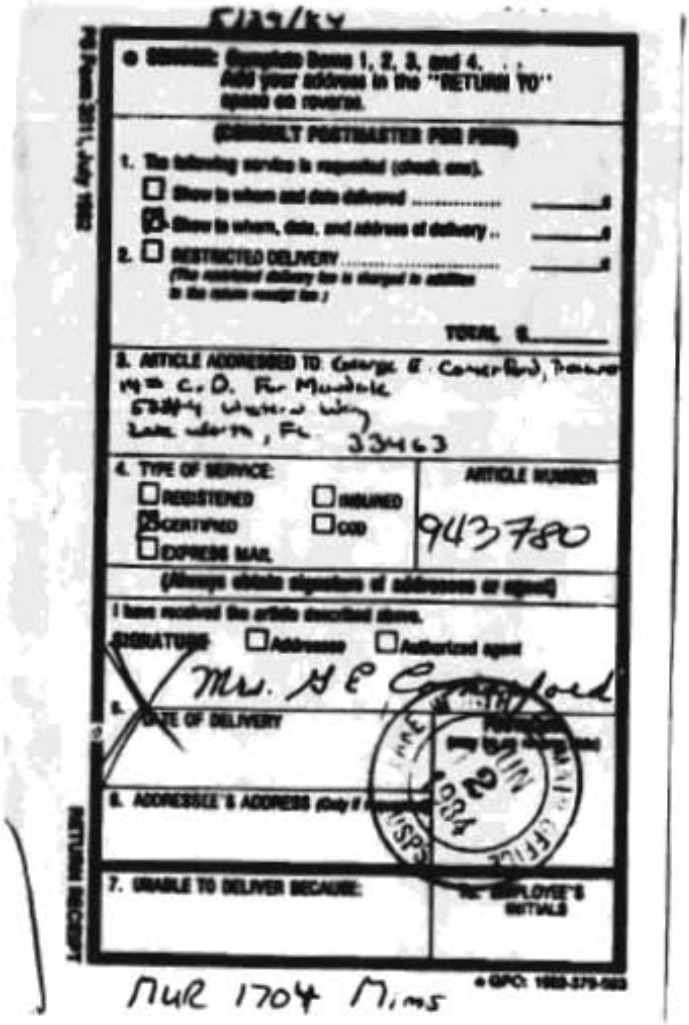
8. EMPLOYEE'S INITIALS

RETURN RECEIPT

GPO: 1992-279-000

MHR 1704 mms

3 5 7 4 0 3 0 4 1 5 1



FL29/KY

PS Form 3811, July 1983

- 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: George E. Crawford, Treasurer
   NRA C.D. For Mundelein
   5384 Waterford Way
   Lake Worth, FL 33463

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

ARTICLE NUMBER: P 943780

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

X Mr. H E Crawford

5. DATE OF DELIVERY

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

EMPLOYEE'S INITIALS

RETURN RECEIPT

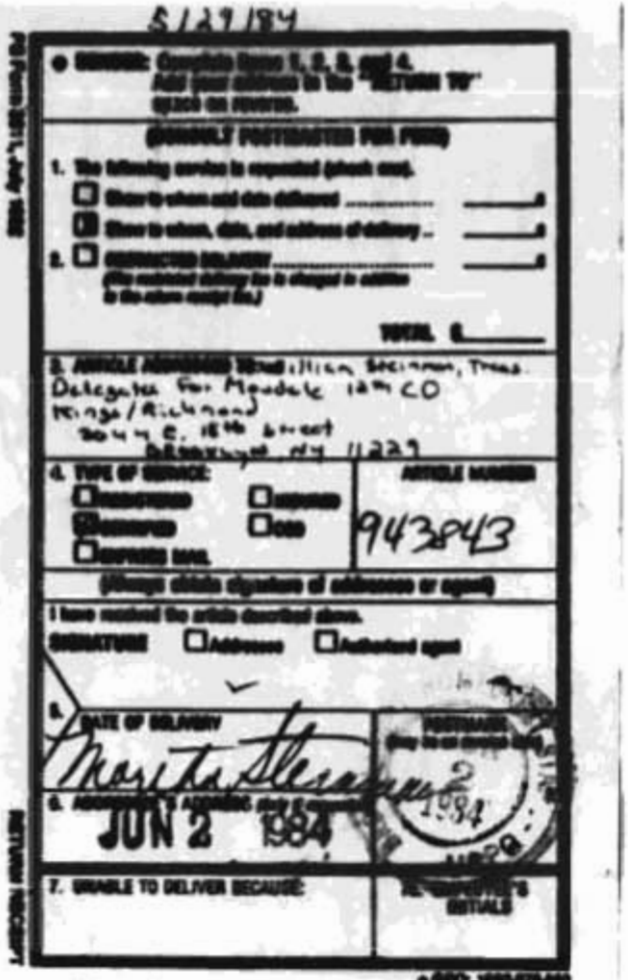
GPO: 1983-379-865

FEB 22 1984

FUR 1704 Mims

8574053241532

5/29/84



Delegate for Mondale 18th CD
Ringe/Richmond
304 E. 18th street
Bklyn NY 11226

943843

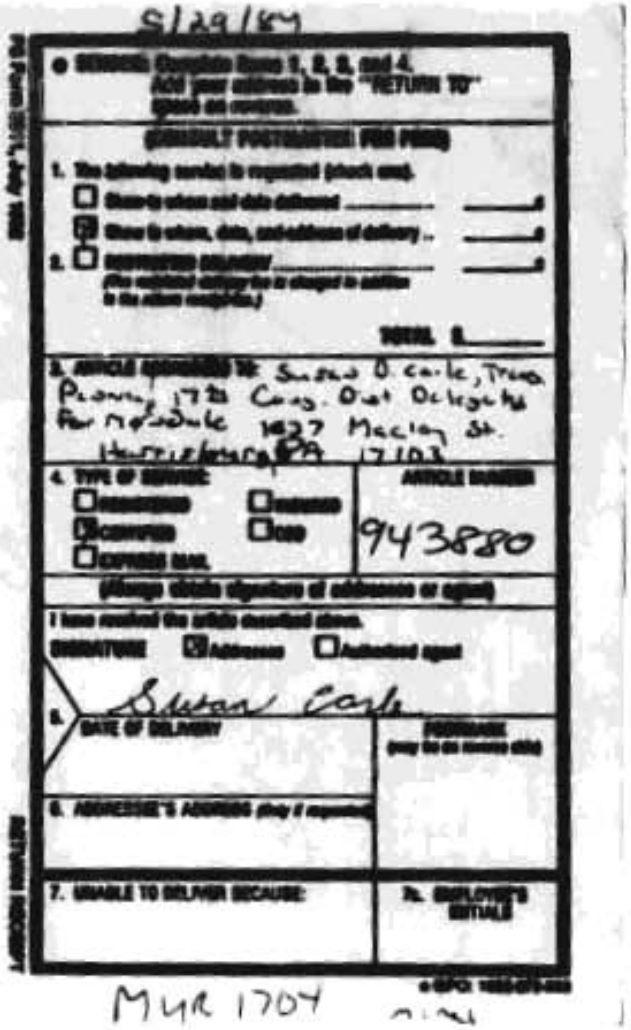
JUN 2 1984

JUN 2 1984

Mur 1704 M.45

9 5 7 4 2 5 5 2 4 1 5 5

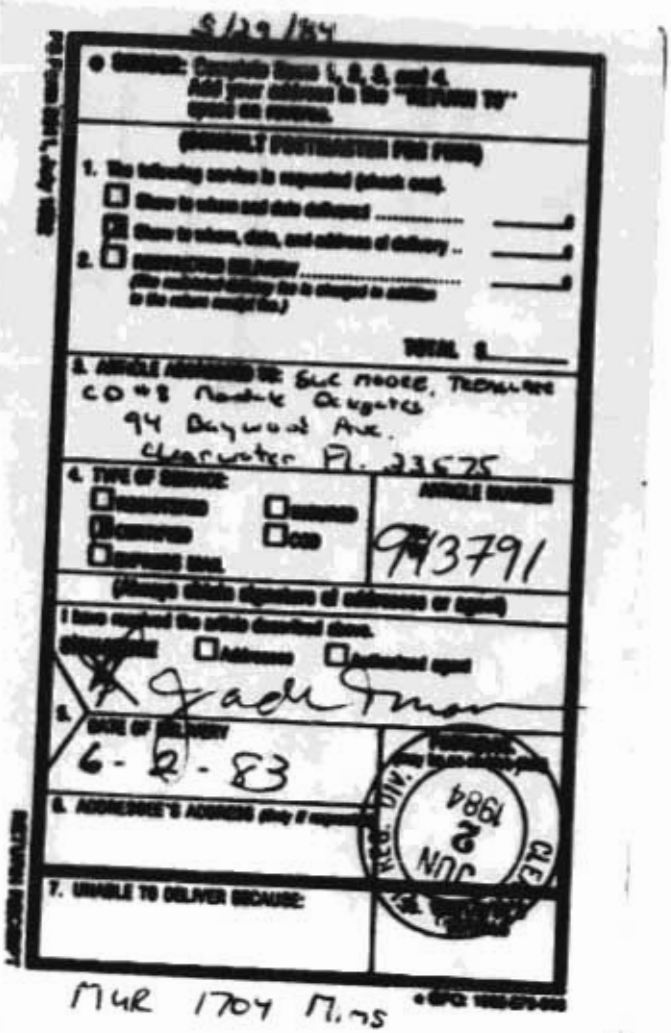
5/29/84



MHR 1704

9 3 7 4 0 3 2 4 1 3 1

5/29/84

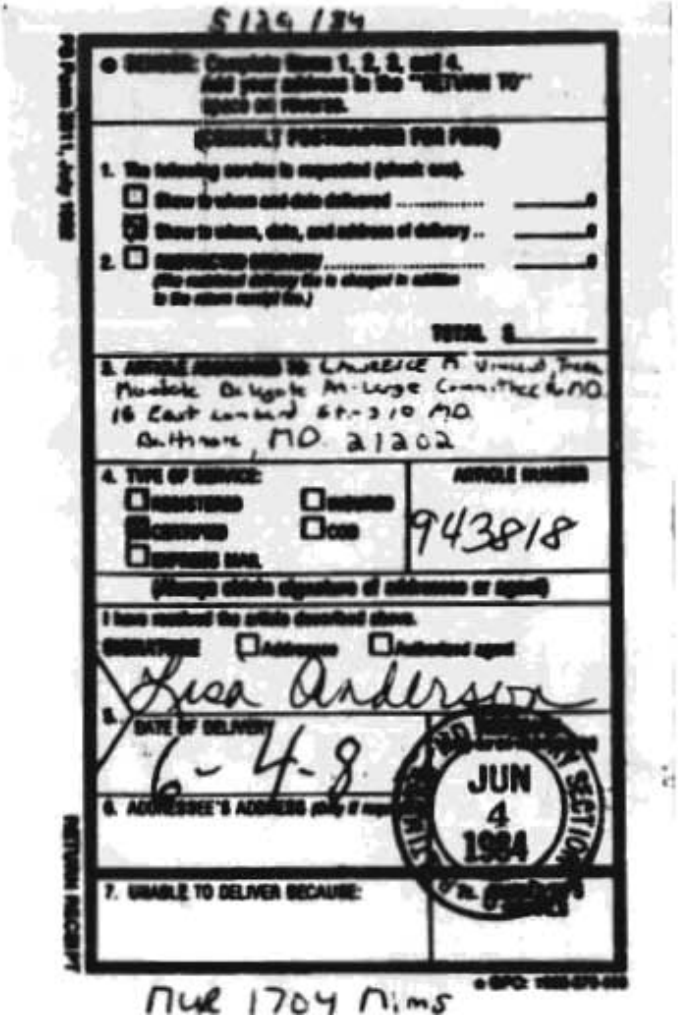


1. The following service is requested (check one).
   - ☐ Show to whom and date delivered 1
   - ☐ Show to whom, date, and address of delivery .. 1
   - ☐ RESTRICTED DELIVERY 1
     (The restricted delivery fee is charged in addition to the return receipt fee.)
   - TOTAL $ ____
2. ARTICLE ADDRESSED TO: Bill Moore, Technician
   CO-8 Rocket Graphics
   94 Daywood Ave.
   Charlestor Pl. 23675
3. TYPE OF SERVICE: ☐ Registered ☐ Insured ☐ Certified ☐ COD ☐ Express Mail
   ARTICLE NUMBER: P 993791
   (Always obtain signature of addressee or agent)
   I have received the article described above.
   SIGNATURE: ☐ Addressee ☐ Authorized agent
   X Jack Thomas
4. DATE OF DELIVERY: 6-2-83
   POSTMARK: REC'D DIV. JUN 2 1984 CLE
5. ADDRESSEE'S ADDRESS (Only if requested and fee paid)
6. UNABLE TO DELIVER BECAUSE:

MHR 1704 M.75

3574205241353

S 129 134



● 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: Candice A Vinnedge
Maryland Delegate At-Large Committee & MD
16 East Lombard St. - 310 MD
Baltimore, MD 21202

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

ARTICLE NUMBER
943818

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
6-4-8

6. ADDRESSEE'S ADDRESS (Only if requested)

JUN 4 1984

7. UNABLE TO DELIVER BECAUSE:

PS Form 3811, July 1983

RETURN RECEIPT

Nwr 1704 Nims

5/29/84

PS Form 3811, July 1983

● 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: Eugene Temkin, Treas., Bronx/Judicial Delegate for Mondale
   92 Hillcrest Road
   Mt. Vernon NY 10552

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

ARTICLE NUMBER: P 743856

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

X [signature]

5. DATE OF DELIVERY: 6/2/84

POSTMARK: JUN 1984 MOUNT VERNON STA.

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

8. EMPLOYEE'S INITIALS

RETURN RECEIPT

GPO: 1983-479-003

MAR 1984 mm

9 3 7 4 0 3 3 2 4 1 3 5 6

3 5 5 4 0 3 2 4 1 5 7

5/29/84

DOMESTIC RETURN RECEIPT

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

(ADDITIONAL POSTMASTER FEE PAID)

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: Dorothy Lewis, Trustee
Anne George) Delegated Authority
8506 Burleigh Drive
Mitchellville, MD 20716

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

ARTICLE NUMBER
943820

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
5/31/84

6. ADDRESSEE'S ADDRESS (Only if requested and fee paid)
3565 Burleigh Dr.
Mitchellville, MD 20716

7. UNABLE TO DELIVER BECAUSE:

8. SIGNATURE OF ADDRESSEE'S AGENT

POSTMARK
31 MAY 1984
USPO MD

• GPO: 1983-379-865

Mar 1704 Mims

5/29/84

PS Form 3811, July 1982

- 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 above regular fee.)

TOTAL $ ___

3. ARTICLE ADDRESSED TO: James A. Voss, Treasurer
   1st C.D., Delegate Fr. Frederick
   RD 1 Box 138
   Oranton, MD 21629

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

ARTICLE NUMBER: P 943817

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

James M. Voss

5. DATE OF DELIVERY: 5/31/84

POSTMARK (may be on reverse side)

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

RETURN RECEIPT

• GPO: 1982-370-865

Rue 1704 Rms

3 3 7 4 2 3 7 4 1 3 3

3511033241352

5/29/84

PS Form 3811, July 1983

● 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 above postage fee.)

TOTAL $____

3. ARTICLE ADDRESSED TO: Ronna Lowenstein, Treas. EMCD. Mondale Caligate Committee 3055 N. Milwaukee Chicago IL 60618

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

ARTICLE NUMBER
943808

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
JUN - 7 1984

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

8. EMPLOYEE'S INITIALS

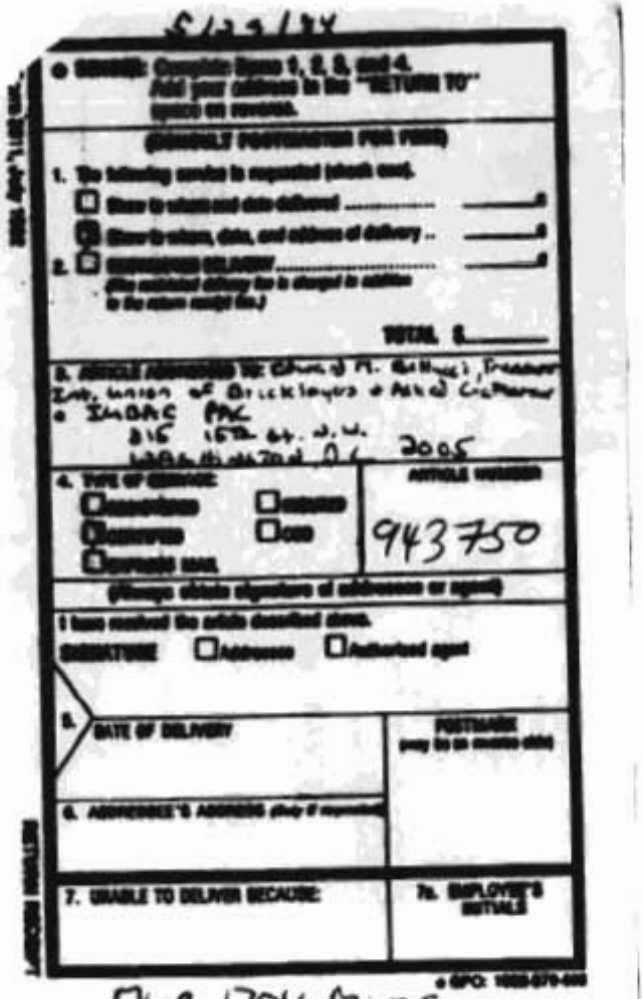
RETURN RECEIPT

USPO JUN 7 1984 CHICAGO IL

MUR 1704 M.M.S

● GPO: 1983-370-865

3511423741657



5/23/24

• 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: Edward M. Gillespie, President
Int. Union of Bricklayers & Allied Craftsmen
• IMPAC PAC
815 16th St. N.W.
Washington DC 20006

4. TYPE OF SERVICE:
☐ Registered ☐ Insured
☐ Certified ☐ COD
☐ Express Mail

ARTICLE NUMBER
943750

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY

POSTMARK
(may be on reverse side)

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

PS Form 3811, July 1988

• GPO: 1988-570-000

MUR 1704 M, ms

3 3 7 4 0 3 0 4 1 6 1

5/27/84

PS Form 3811, July 1983

- 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: James M. Poole, Treasurer
Democratic Delegates for the Ill. 8th Congress
901 W. Orange
Peoria, Ill. 61604

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

ARTICLE NUMBER: 943810

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

Mary Harbaugh

5. DATE OF DELIVERY: 6-2-84

POSTMARK (may be on reverse side)

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS:

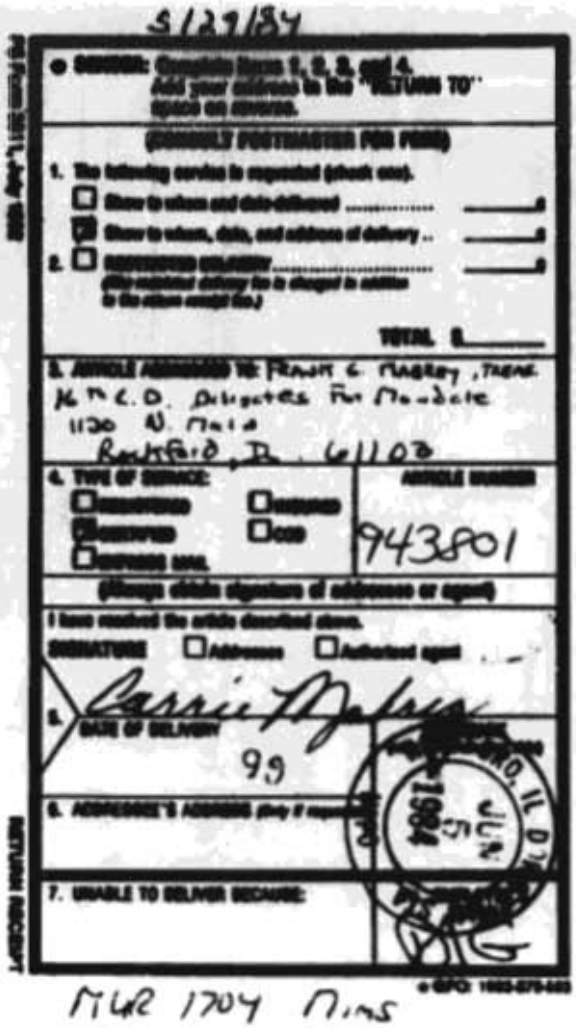
RETURN RECEIPT

GPO: 1983-376-865

Mail 1704 Ill.

3 5 7 4 0 3 5 2 4 1 5 2

5/29/84



MAR 1704 Mins

5/29/84

PS Form 3811, May 1982

• 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: MELINDA F VANCE TREAS
TARRANT COUNTY DEMOCRATIC COMM; TTEE
3901 MARTIN GRIFFIN LANE
FORT WORTH, TX 76109

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

ARTICLE NUMBER: P 943887

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☒ Authorized agent

Melinda Vance

5. DATE OF DELIVERY: 6-5-84

6. ADDRESSEE'S ADDRESS (Only if requested): SAME AS ABOVE

FT WORTH, TEXAS JUN 5 1984

7. UNABLE TO DELIVER BECAUSE: ____ CLERK'S INITIALS

RETURN RECEIPT

• GPO: 1982-370-865

MUR 1704 mms

P 943 887 153

3 5 1 4 2 3 2 4 1 5 4

5/29/84

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 .. ___
   - ☐ RESTRICTED DELIVERY ..... ___
   (The restricted delivery fee is charged in addition to the basic mailing fee.)

TOTAL $ ___

2. ARTICLE ADDRESSED TO: Patrick C. Hunting, Public Serv. Dist. Director, Box Mountain
   P.O. Box 111
   COBDEN, Ill. 62917

3. TYPE OF SERVICE:
   - ☐ REGISTERED
   - ☐ INSURED
   - ☒ CERTIFIED
   - ☐ COD
   - ☐ EXPRESS MAIL

ARTICLE NUMBER: 943765

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE: ☒ Addressee ☐ Authorized agent

Patrick C. Hunting

4. DATE OF DELIVERY: 6-6-84

5. ADDRESSEE'S ADDRESS (Only if requested and fee paid)

6. UNABLE TO DELIVER BECAUSE:

JUN 6 1984

RECEIVED

FC

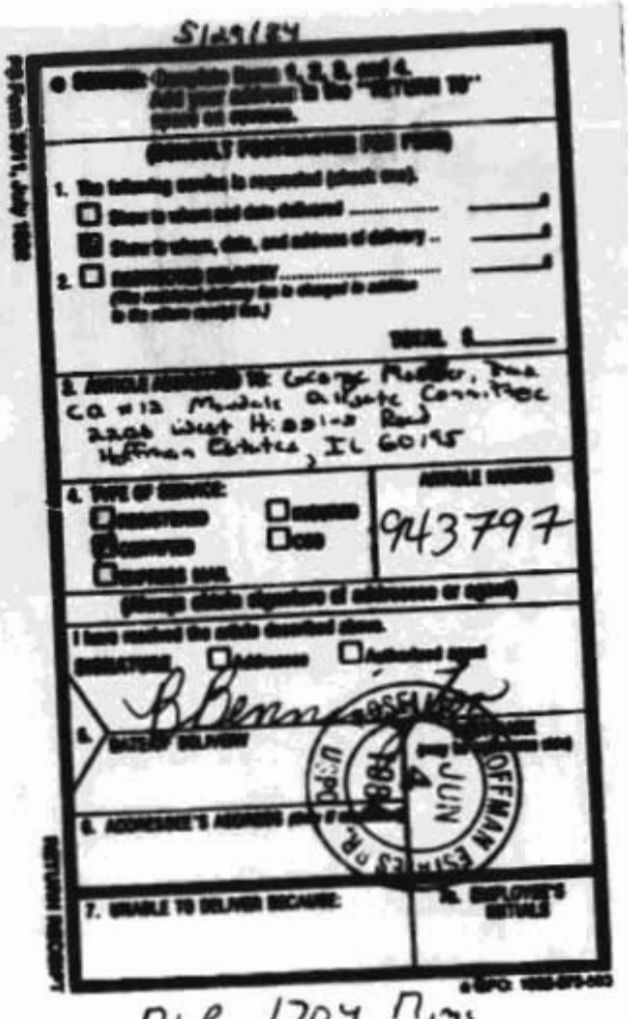
PS Form 3811, July 1983

RETURN RECEIPT

MAR 1704 Nine

3 3 3 4 0 3 3 4 1 5 7

5/29/84



NLR 1704 Mins

3 7 7 4 0 3 7 4 1 5 5

$1.29 1R4



- 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: Elizabeth McCurdy, Pres
4th District Delegate Fed Republic
1205 8th Ave. PO Box 136
BEAVER FALLS, PA 15010

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

ARTICLE NUMBER: 943868

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

J. Murray

5. DATE OF DELIVERY: JUN 5 1984

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

JUN 6 1984 BEAVER FALLS, PA

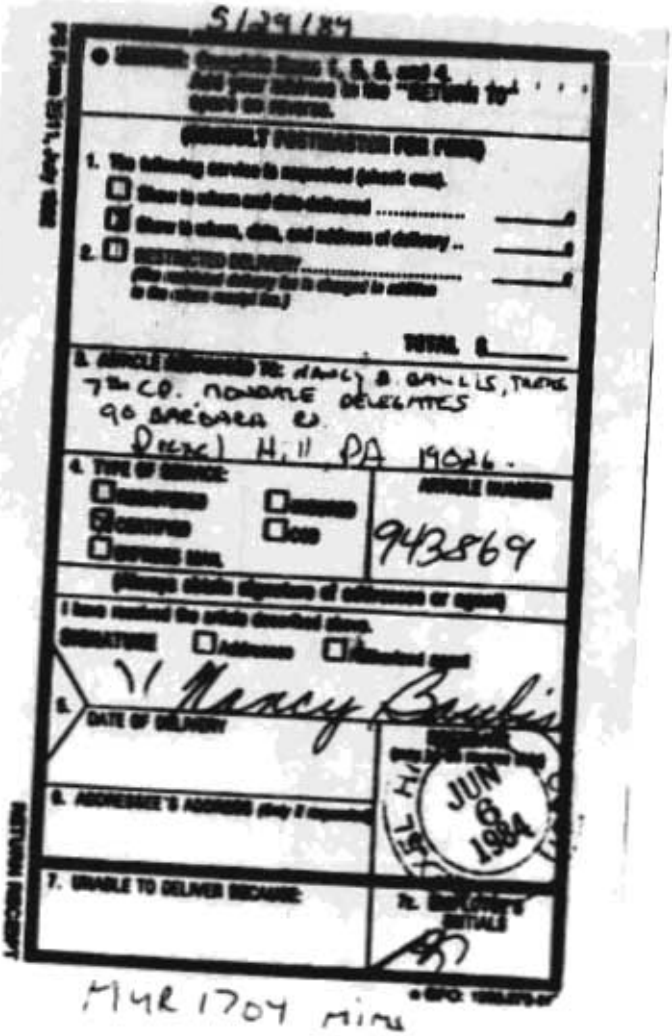
RETURN RECEIPT

GPO: 1983-370-865

Mar 1704 mms

3 3 7 4 2 3 2 4 1 5 7

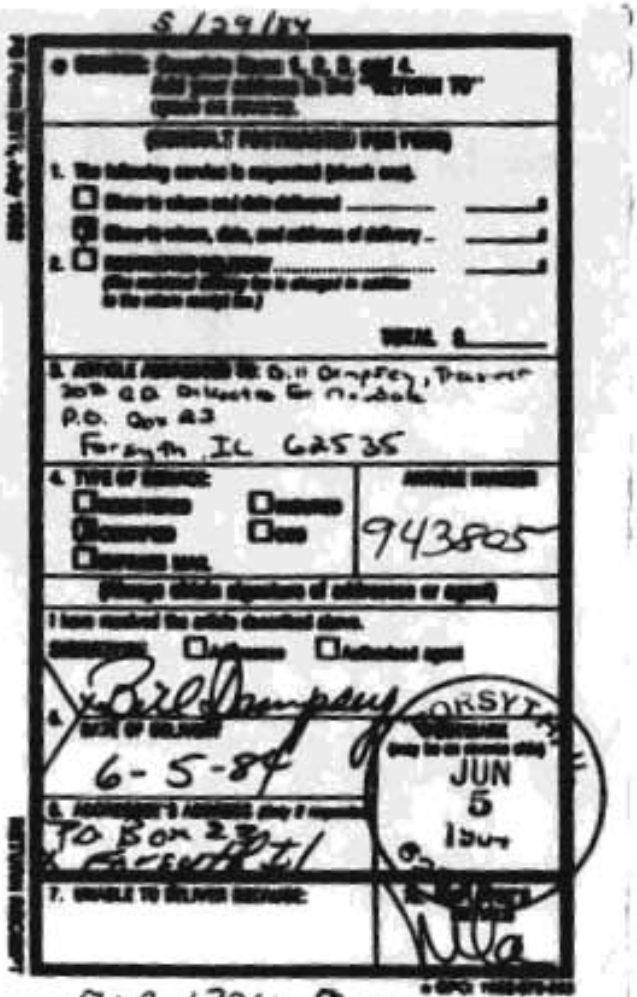
5/29/84



MHR 1704 MIM

3 3 7 4 2 3 7 4 1 5 3

5/29/84



MAR 1704 M.-S

3 7 0 . 0 2 7 4 1 5 2

5/29/84

PS Form 3811, July 1983

● 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: Richard Spaeth, Treasurer
North Dakota Democratic For Kidder County
70 N S
FARGO, NORTH DAKOTA 58107

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

ARTICLE NUMBER
943767

(Always obtain signature of addressee or agent)

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

5. Kelly Spaeth

DATE OF DELIVERY
6/4/84

6. ADDRESSEE'S ADDRESS (Only if requested)

JUN 4 1984

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

RETURN RECEIPT

• GPO: 1983-379-028

NUR 1704 Mims

3 5 7 4 2 3 2 4 1 7 2

5/29/84

PS Form 3811, July 1983

- GIVE FULL ADDRESS FOR BOTH ITEMS 1 AND 2.
- SIGN AND PRINT YOUR NAME AND 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 .. ____
   - ☐ RESTRICTED DELIVERY ..... ____
   (The restricted delivery fee is charged in addition to the return receipt fee.)

   TOTAL $ ____

2. ARTICLE ADDRESSED TO: DENNIS O'DELL CHAIRMAN, FEDERAL ELECTION COMMISSION 325 K ST NW WASHINGTON DC 20463

3. TYPE OF SERVICE:
   - ☐ REGISTERED ☐ INSURED
   - ☒ CERTIFIED ☐ COD
   - ☐ EXPRESS MAIL

   ARTICLE NUMBER: P 743866

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE: ☐ Addressee ☒ Authorized agent

Anne Aum...

4a. DATE OF DELIVERY: 6-1-84

5. ADDRESSEE'S ADDRESS (Only if requested)

WASHINGTON, D.C. JUN 1 1984

7. UNABLE TO DELIVER BECAUSE:

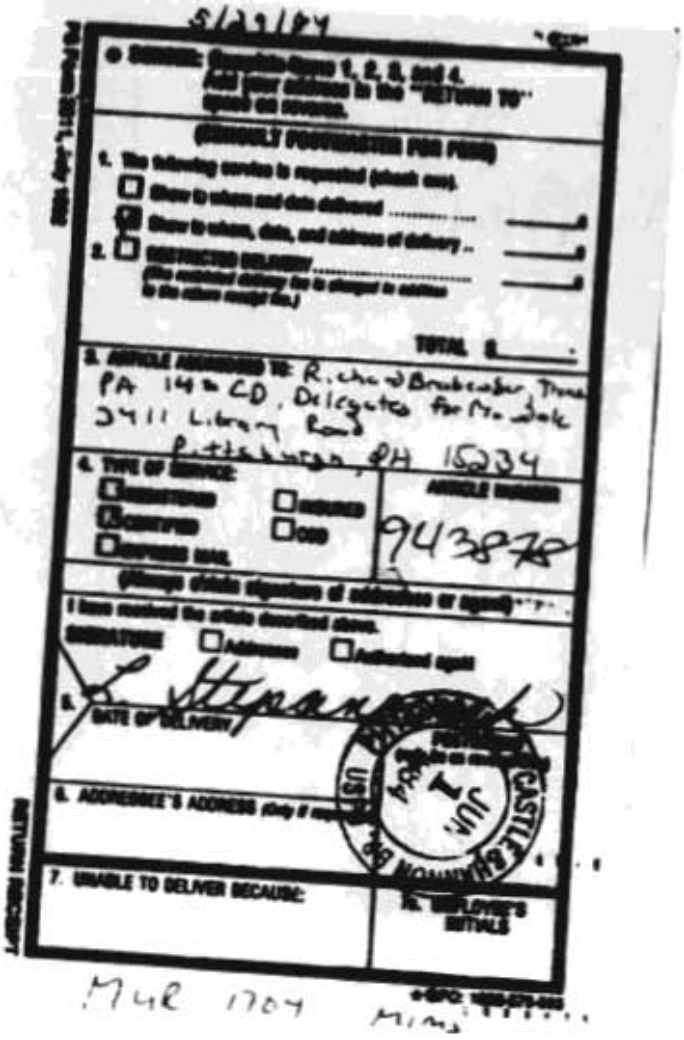
8. EMPLOYEE'S INITIALS

RETURN RECEIPT

GPO: 1983-376-865

MUR 1704

3 5 7 4 2 3 4 1 7 1



5/29/84

PS Form 3811, July 1983

DOMESTIC RETURN RECEIPT

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

(ADDRESSEE PERFORMANCE 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: Richard Brubaker, Treas
PA 14th CD, Delegates for Mr. Jack
3411 Library Road
Pittsburgh, PA 15234

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

ARTICLE NUMBER
943878

(Always obtain signature of addressee or agent)

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

5. [signature]

6. DATE OF DELIVERY

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

8. EMPLOYEE'S INITIALS

POSTMARK
JUL 7 1984
U.S. POSTAL SERVICE

*GPO: 1983-376-865

Mar 1704

3 5 2 4 0 3 4 1 7 2

$1.25/44

PS Form 3811, July 1983

● 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: Eugene Gloor, Director
Int. United Nuclear, State Aerospace Academy of
Parliament Non-Partisan Political Analysis
1000 Connecticut Ave. and
Washington, D.C. 20036

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

ARTICLE NUMBER
943753

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
MAY 31 1984

POSTMARK
MAY 31 1984

6. ADDRESSEE'S ADDRESS (Only if requested)

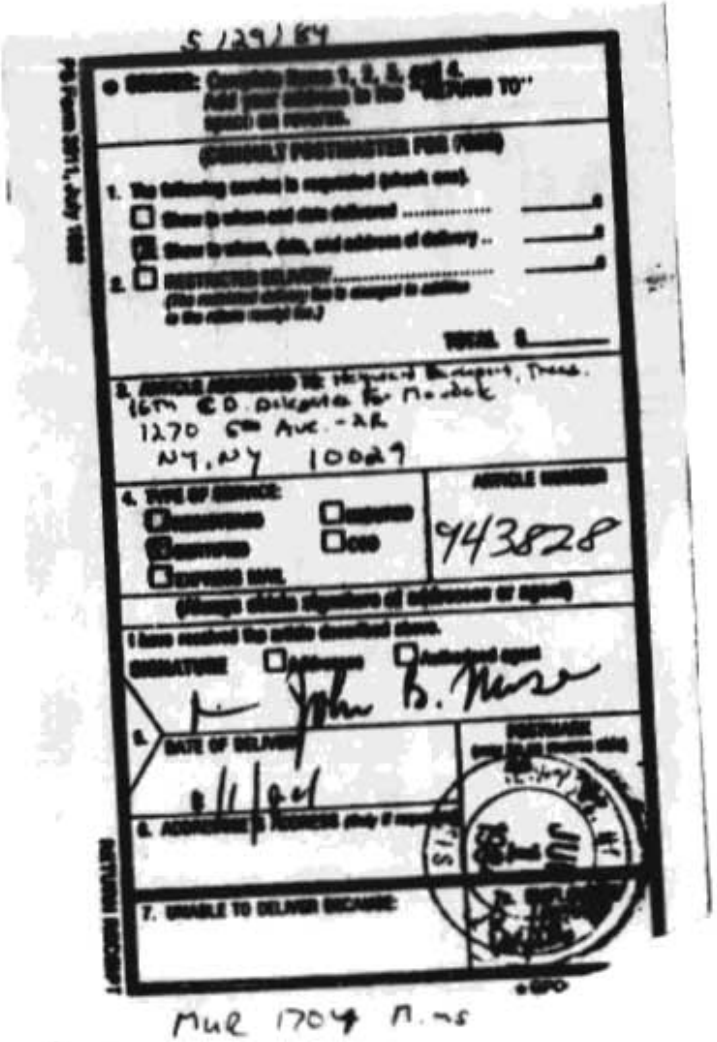
7. UNABLE TO DELIVER BECAUSE:

RETURN RECEIPT

GPO: 1983-370-865

MAR 1704 Nims

3 5 7 4 0 5 0 4 1 7 3



5/29/84

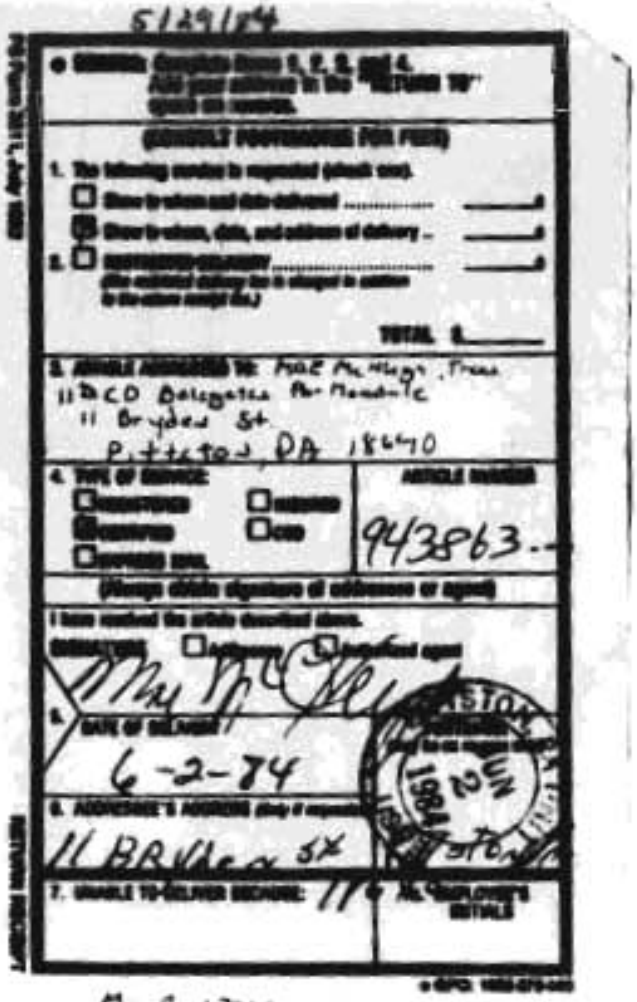
16th C.D. Dilenia for Nadler
1270 6th Ave. - AA
NY, NY 10029

943828

John B. Nurse

MUR 1704 A.-5

5129154



11 DCO Delegates Re Mondale
11 Bryden St
Pittston, PA 18640

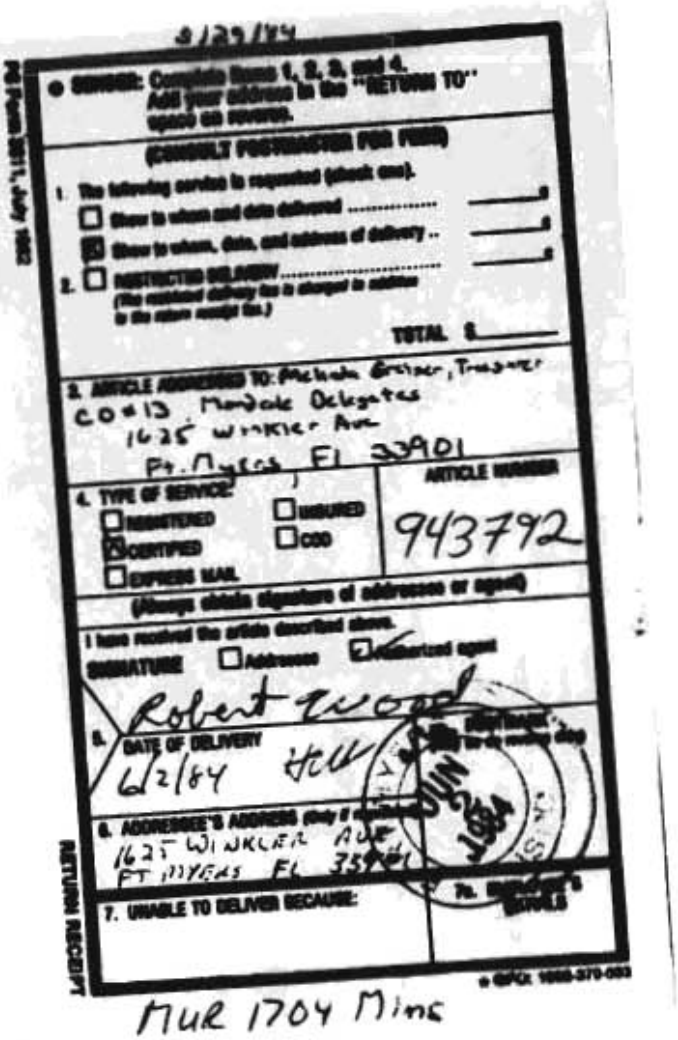
943863

6-2-74

11 BRYden ST

MLR 1704 MIMS

3 5 7 4 0 3 7 4 1 7 7



8/29/84

PS Form 3811, July 1983

RETURN RECEIPT

- 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: Michele Greiner, Treasurer
   CO#13 Mandate Delegates
   1625 Winkler Ave
   Ft. Myers, Fl 33901

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

ARTICLE NUMBER: 943792

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☒ Authorized agent

Robert Wood

5. DATE OF DELIVERY 9/2/84

6. ADDRESSEE'S ADDRESS (Only if requested)
   1625 WINKLER AVE
   FT MYERS FL 33901

7. UNABLE TO DELIVER BECAUSE:

8. POSTMASTER'S INITIALS

GPO: 1983-370-003

MUR 1704 Minc

5/23/84

PS Form 3811, July 1983

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

(ADDITIONAL POSTMASTER FEES PAID)

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: Osmund E. Smyth, Trus.
C.O. P.O. Drawer No. Mobile
6520 2nd Ave OR West
ORANGE-TOP, FL 33529

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

ARTICLE NUMBER: 943724

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☒ Authorized agent

X Barbara Smyth

5. DATE OF DELIVERY: 6/2/84

POSTMARK (affixed on reverse side)

6. ADDRESSEE'S ADDRESS (Only if requested)
5520 2nd Ave W
Bradenton Fla 33529

7. UNABLE TO DELIVER BECAUSE:

8a. EMPLOYEE'S INITIALS

RETURN RECEIPT

• GPO: 1983-379-833

Mar 1704 Mins

3 5 2 4 0 3 5 2 4 1 7 5

3574003241177

5/24/84

PS Form 3811, July 1983

● 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: Alma Dull, Treasurer
7th District Delegates for Mondale
538 W. Lafayette
Baltimore, MD 21217

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

ARTICLE NUMBER
P 943822

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
Alma T. Dull
538 W. Lafayette Ave.

5. DATE OF DELIVERY
6-5-84

POSTMARK for fee
JUN 8 1984
USPS BALTIMORE, MD

6. ADDRESSEE'S ADDRESS (Only if requested)

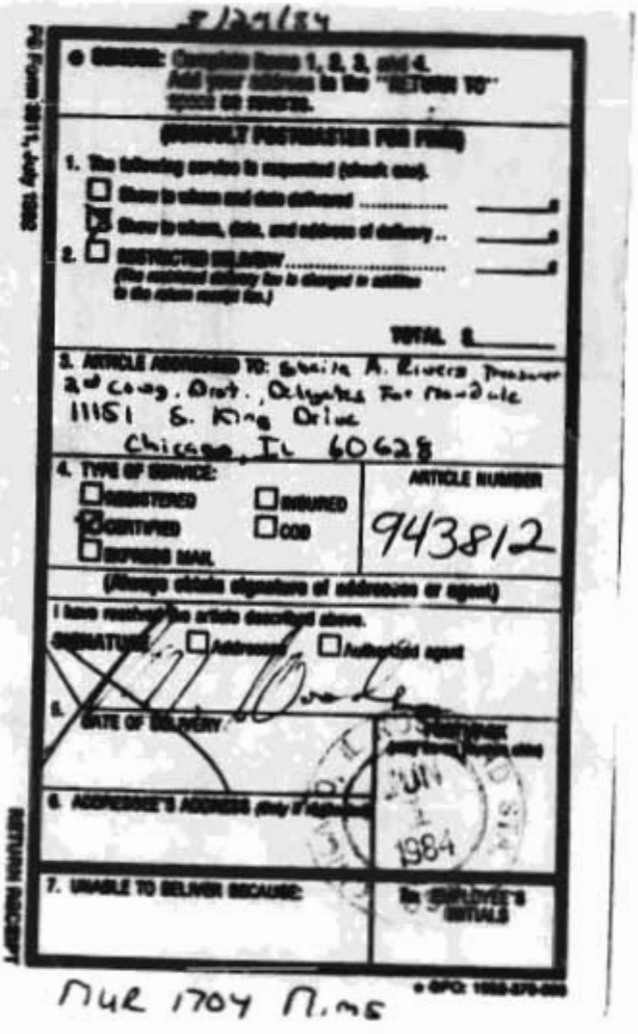
7. [illegible]

8. EMPLOYEE'S INITIALS

GPO: 1983-376-865

MUR 1704 M,MS

3 3 7 4 0 3 7 4 1 7 3



8/29/84

PS Form 3811, July 1983

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

(RETURN 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: Gloria A. Rivera Paralegal Comp. Dist., Attorney for Mandate
11151 S. King Drive
Chicago, IL 60628

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

ARTICLE NUMBER
943812

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY

POSTMARK (only if requested)

6. ADDRESSEE'S ADDRESS (only if requested)

7. UNABLE TO DELIVER BECAUSE:

8. EMPLOYEE'S INITIALS

RETURN RECEIPT

* GPO: 1983-376-865

JUL 1984

Mar 1704 Mac

3 5 2 4 0 3 2 4 1 7 2

5/29/84

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

(ADDITIONAL POSTMASTER FEE REQUIRED)

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: Robert D. Parks, Treasurer
Nautilus 15th District Delegate Committee
440 S. Andrews Ave.
Ft. Lauderdale Fl 33301

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

ARTICLE NUMBER
943789

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
6/1/84

POSTMARK
FORT LAUDERDALE, FLA. RED
JUN

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

PS Form 3811, July 1983

MAR 1704 M.95

8/29/164

PS Form 3811, July 1983

- 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: Thomas A. Rust, Treasurer Committee for Western Democracy NY Number Outside Suite 900 First Federal Plaza Rochester, NY 14614

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

ARTICLE NUMBER: 943838

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized Agent

X Andrea Chelle

5. DATE OF DELIVERY

POSTMARK (Affix on reverse side)

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

EMPLOYEE'S INITIALS

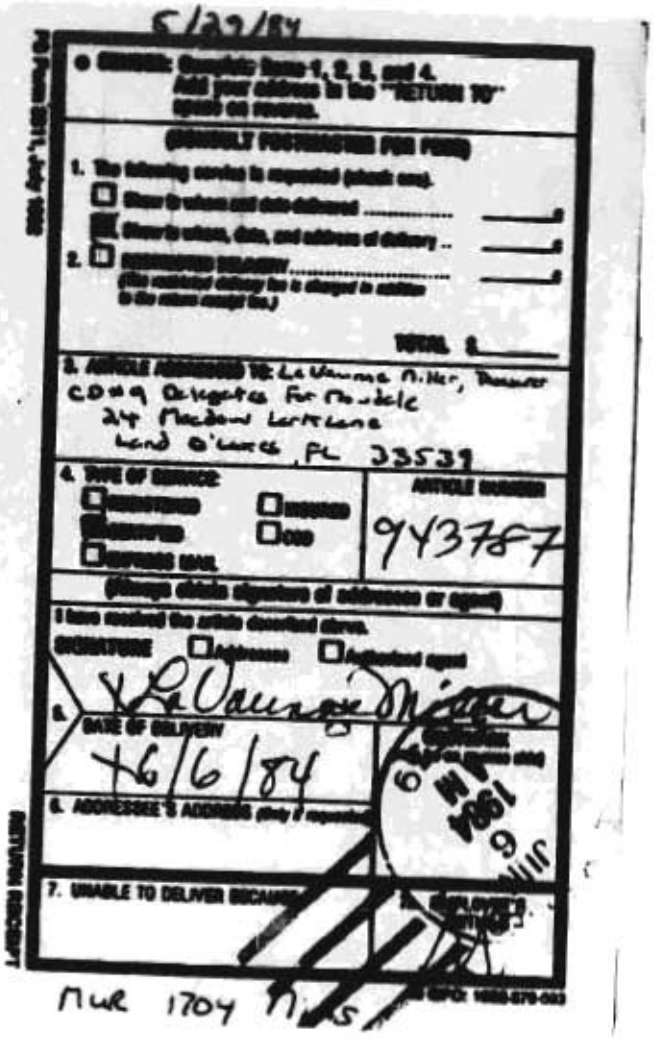
RETURN RECEIPT

* GPO: 1983-376-865

MAR 1704 M...

3 3 2 2 4 1 3 7

3720405241131



3 7 7 4 2 7 7 4 1 8 2

5/29/84

PS Form 3811, July 1983

- 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: Elliot O. Kline, Treasurer
C.O. #10, Norfolk Delegate Committee
908 Rainbow Lane
Palo Alto, Ill 60840

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

ARTICLE NUMBER: P 943796

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

J. Santalesa

5. DATE OF DELIVERY: 6-4-84

6. ADDRESSEE'S ADDRESS (Only if requested)

WHEELING JUN 4 1984

7. UNABLE TO DELIVER BECAUSE:

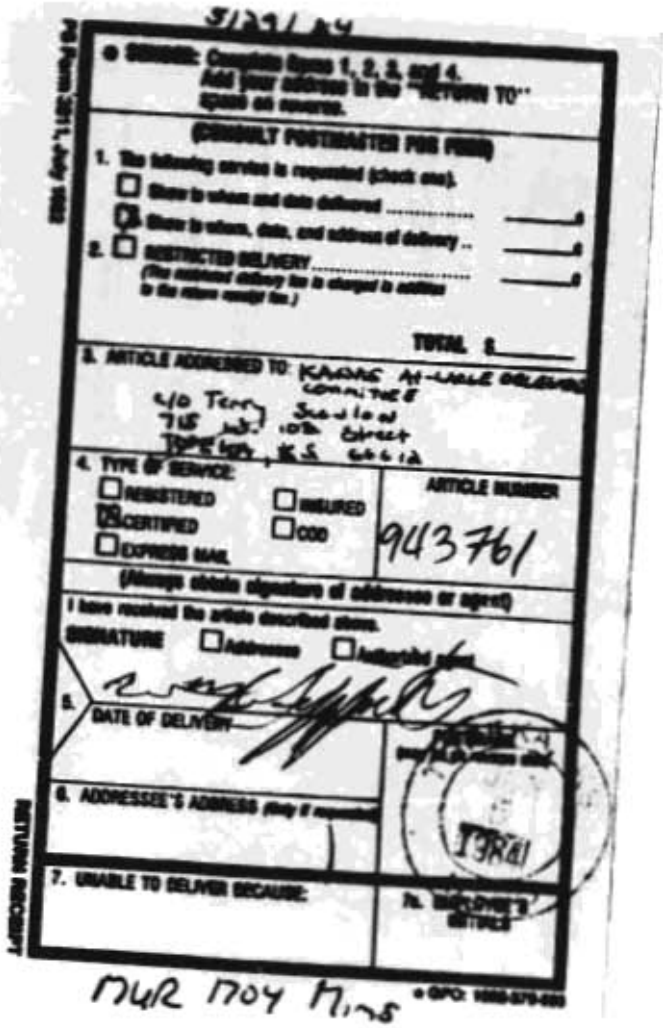
8. POSTMASTER'S INITIALS

RETURN RECEIPT

GPO: 1983-370-865

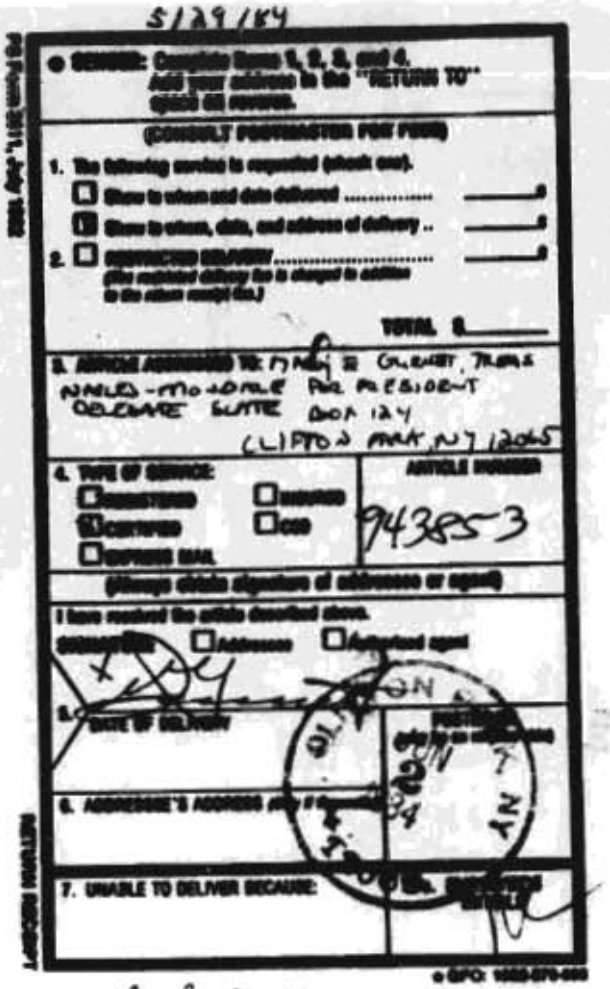
Mar 1704 Nine

3 3 3 4 0 3 2 4 1 3 3



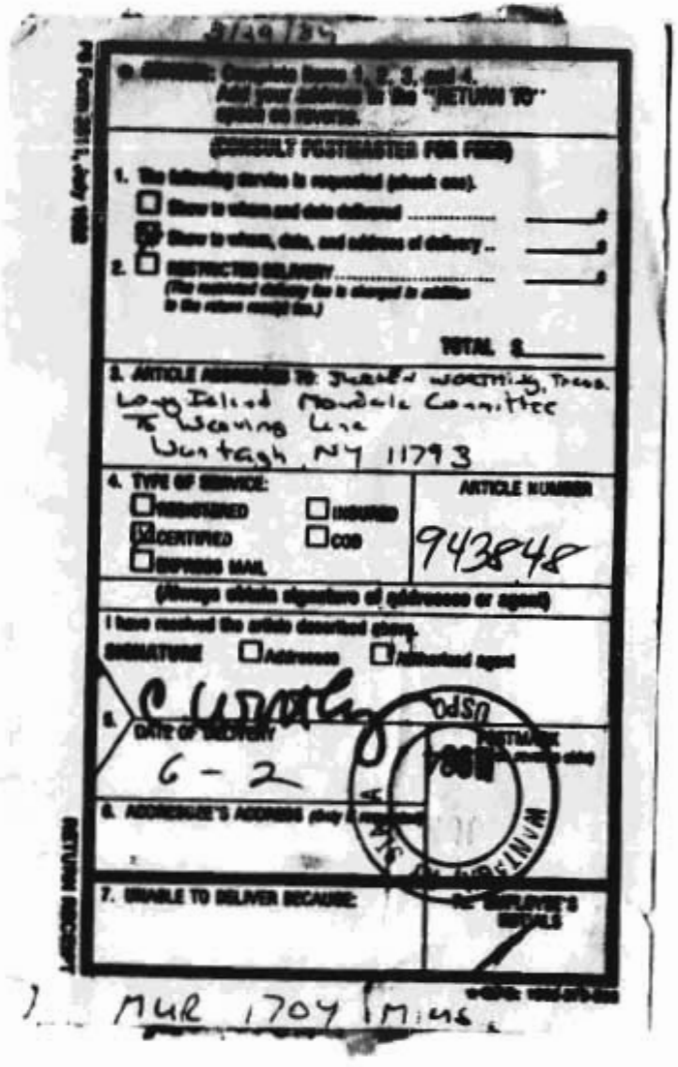
MAR MOY Hins

5/29/84



MAR 1704 MMS

8 3 3 4 2 3 5 2 4 1 3 1



5/19/95

(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: James Worthley, Treas.
Long Island Mandala Committee
% Waning Line
Wantagh NY 11793

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

ARTICLE NUMBER: 94848

(Always obtain signature of addressee or agent)

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

5. C Worthley

6. DATE OF DELIVERY: 6-2

POSTMARK: USPO 11793

7. UNABLE TO DELIVER BECAUSE:

MAR 1704 Mins

S/29/84

PS Form 3811, July 1983

● 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 Donald T. Hall, President
United Auto Workers - UAW-V-CAP
8000 EAST JEFFERSON
Detroit, MI 48214

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

ARTICLE NUMBER
943757

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

5. M. Rodu

DATE OF DELIVERY

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

EMPLOYEE'S INITIALS

RETURN RECEIPT

* GPO: 1988-270-865

MAR 1704 Mins

3 3 7 4 2 3 7 4 1 8 3

3 3 2 4 2 3 0 4 1 3 7

5/29/84

PS Form 3811, July 1983

● 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 1
☐ Show to whom, date, and address of delivery .. 1
2. ☐ RESTRICTED DELIVERY 1
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $ ____

3. ARTICLE ADDRESSED TO: Ralph Coldiron, Treasurer
Kentucky At-Large Delegates For Hunter Campaign
159 Avondale Drive
Lexington, Kentucky 40504

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

ARTICLE NUMBER
943768

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY

6. ADDRESSEE'S ADDRESS (Only if requested)

JUN 7 1984

7. UNABLE TO DELIVER BECAUSE:

8. POSTMASTER

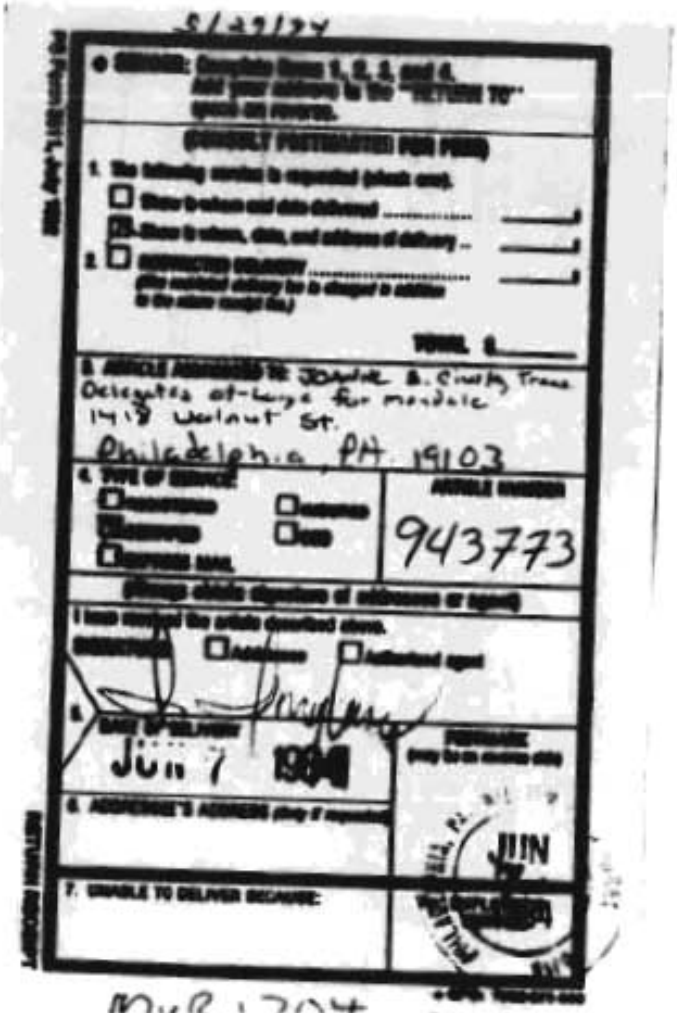
RETURN RECEIPT

GPO: 1983-375-715

MUR 1704 M.M.S

3 5 5 4 0 5 5 4 1 9 3

5/29/24



MUR 1704 mms

3 5 2 4 0 2 4 1 8 2

5/29/84

PS Form 3811, July 1983

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

(RESTRICTED 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: D. Hut M CARA, President
LI - MOBILE AD CO
P.O. Box 565
Lindenhurst, NY 11757

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

ARTICLE NUMBER
P 943 846

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY

6. ADDRESSEE'S ADDRESS (only if requested)

7. UNABLE TO DELIVER BECAUSE:

STAMP

LINDENHURST JUN 1984 N.Y.

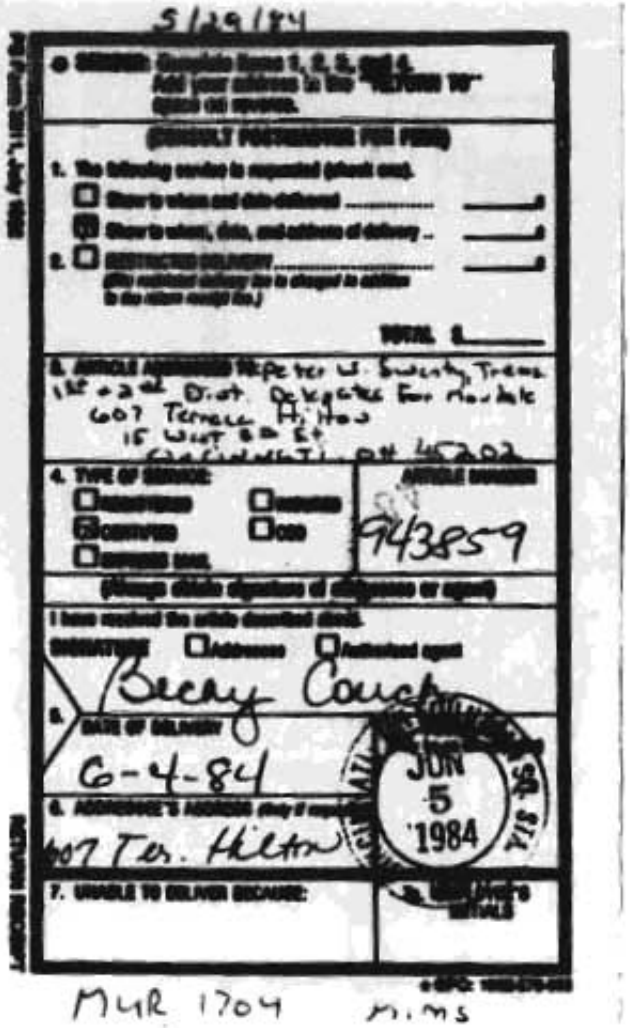
RETURN RECEIPT

GPO: 1983-479-865

MUR 1704 MIMS

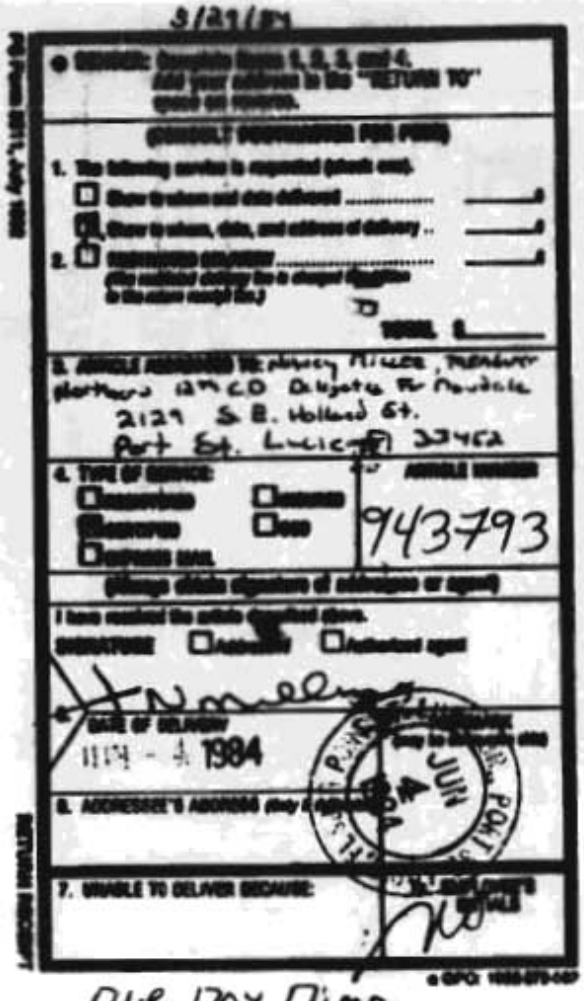
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5/29/84



MHR 1704 M.MS

3/23/84



Nue 1704 Mims

P 372 405 419 2

5/29/84

PS Form 3811, July 1983

● 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: Nuclear Energy Treasurer
At-Large Delegates For Nuclear
P.O. Box 81742
SEATTLE, WA 98111

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

ARTICLE NUMBER: P 943890

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

X L C Emery

5. DATE OF DELIVERY: JUN 5 1984

POSTMARK

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

8. EMPLOYEE'S INITIALS

RETURN RECEIPT

GPO: 1983-370-853

MAR 1704

5/23/84

PS Form 3811, July 1983

● 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: Kevin A. Cleaver, Executive Director
Democratic Republic Objects Committee
528 N 32
Milwaukee, WI 53233

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

ARTICLE NUMBER
943764.

(Always obtain signature of addressee or agent)

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

6. DELIVERY: MILWAUKEE, WI 14
BOX SECTION

6. ADDRESSEE'S ADDRESS (Only if requested)
JUN 6 1984

POSTMARK

7. UNABLE TO DELIVER BECAUSE:
USPS

8. EMPLOYEE'S INITIALS

PS Form 3811, July 1983 RETURN RECEIPT

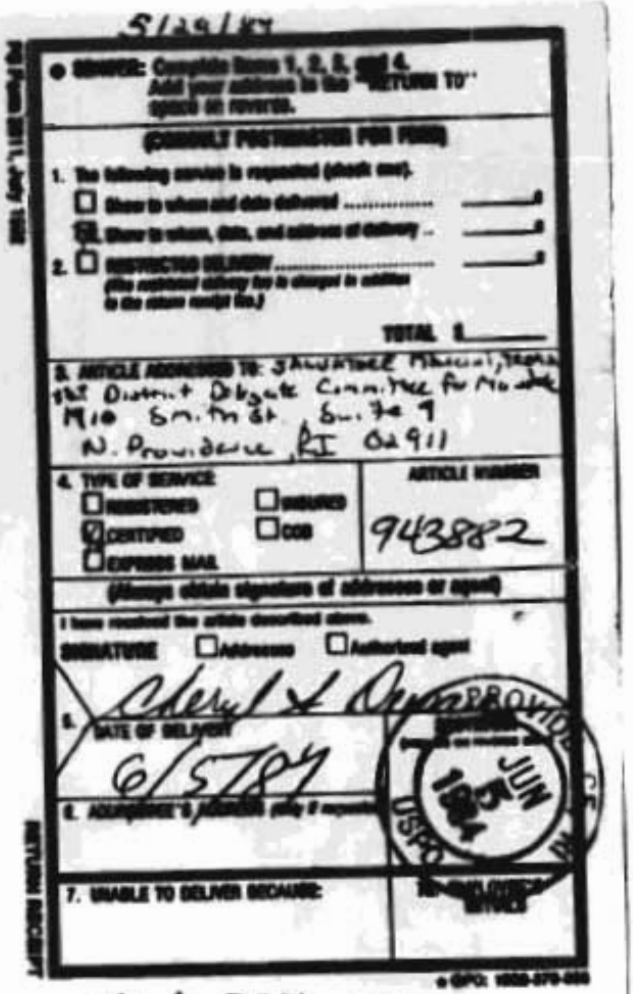
GPO: 1983-379-408

MUR 1704 Div

3 5 1 4 0 3 7 4 1 9 3

3 5 7 4 0 3 5 2 4 1 9 1

5/29/84



- 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: Jacqueline Medeiros, Treas.
   RI Democratic State Committee
   210 Smith St Suite 9
   N. Providence, RI 02911

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

ARTICLE NUMBER: 943882

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

6. Cheryl A Dyer

DATE OF DELIVERY: 6/5/84

8. ADDRESSEE'S ADDRESS (Only if requested)

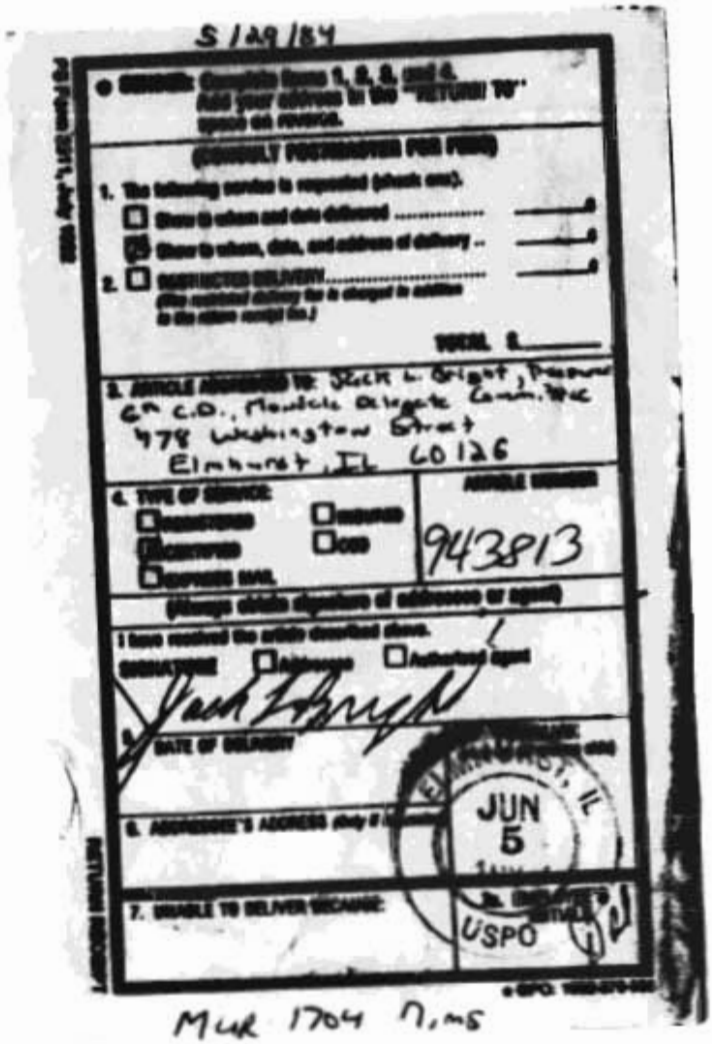
7. UNABLE TO DELIVER BECAUSE:

RECEIVED JUN 1984 USPO

AMERICAN RETURN RECEIPT

MAL 1704 mine

S 129 184



Mur 1704 7,ms

3 3 3 4 0 5 5 0 4 1 9 7

file

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Re: MUR 1704

Dear :

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.

8304041965

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

8504050041 97

The Honorable Walter F. Mondale
and Mondale for President
c/o David Ifshin, Esquire
Carolyn Oliphant, Esquire
2201 Wisconsin Avenue, N.W.
Suite 100
Washington, D.C. 20007Mr. Ifshin

Thomas R. Donahue, Treasurer
American Federation of Labor, Congress
of Industrial Organizations &
AFL-CIO COPE PCC
815 16th Street, N.W.
Washington, D.C. 20006

William Lucy, Treasurer
American Federation of State
County and Municipal Employees
& AFSCME Public Employees Organized
to Promote Legislative Equality- QUALIFIED
1625 L Street, N.W.
Washington, D.C. 20036

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American Federation of Teachers &
American Federation of Teachers COPE
11 Dupont Circle, N.W.
Washington, D.C. 20036

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United Food and Commerical Workers
& United Food and Commerical
Workers Active Ballot Club
1775 K. Street, N.W.
Washington, D.C. 20006

Edward M. Bellucci, Treasurer
International Union of Bricklayers and
Allied Craftsmen and International &
Union of Bricklayers and Allied
Craftsmen PAC
815 15th Street, N.W.
Wshington, D.C. 20005

Patrick J. Campbell, Treasurer
United Brotherhood of Carpenters
and Joiners of America &
Carpenters Legislative Improvement
Committee
101 Constition Avenue, N.W.
Washington, D.C. 20001

8504030419 8

John T. Taylor, Treasurer
International Association of
Bridge, Steel and Ironworkers
& Ironworkers Political Action
League
1750 New York Avenue, N.W.
Washington, D.C. 20006

Eugene Glover, Treasurer
International Union, Machinists
and Aerospace Workers & Machinist
Non-Partisan Political League
1300 Connecticut Avenue, N.W.
Washington, D.C. 20036

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Textile Workers Union &
Amalgamated Clothing
and Textile Workers Union
PAC
15 Union Square
New York, NY 10003

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Communication Workers of America
& CWA-COPE PCC
1925 K Street, N.W.
Washington, D.C. 20006

Richard W.Cordtz, Treasurer
Service Employees International
Union & Service Employees
International Union COPE PCC
2020 K Street, N.W.
Washington, D.C. 20006

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United Auto Workers and
UAW-V-CAP
8000 East Jefferson
Detroit, MI 48214

John J. Banovic, Treasurer
United Mine Workers of America
& United Mine Workers of
America Coal Miners' PAC
900 15th Street, N.W.
Washington, D.C. 20005

9504030419 2

Nancy Ryan, Treasurer
New Hampshire First District
Delegates For Mondale
5 Haines
Merrimack, NH 03054

Anthony Redington, Treasurer
New Hampshire Second District
Delegates For Mondale
4 Neil Drive
Allenstown, NH 03275

Kansas At-Large Delegate
Committee
c/o Terry Scanlon
715 W. Tenth Street
Topeka, KS 66612

Blake Wordal, Treasurer
Montana At-Large Delegates
For Mondale Committee
846 E. Sixth Avenue
Helena, MT 59601

Larry D. Owen, Treasurer
Sixth District Delegates
For Mondale Committee
1019 Huntington
East Lansing, MI 48823

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Delegate Committee
538 N32
Milwaukee, WI 53208

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Delegates For Mondale
P.O. Box 111
Cobden, Illinois 60451

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Fourth District Mondale
Delegate Committee
1210 Timber Place, Apt 1B
New Lenox, Illinois 60451

3504042

Nicholas Spaeth, Treasurer
North Dakota Delegates For
Mondale Committee
70 N 5
Fargo, North Dakota 58107

Ralph Coldiron, Treasurer
Kentucky At-Large Delegates
For Mondale Committee
1513 Pinemeadow Drive
Lexington, Kentucky 40504

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10th CD District Delegates
for Mondale
1551 East 23rd Street
Brooklyn, NY 11210

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Wisconsin At-Large Delegates
for Mondale
126 Sunny Meade Lane, No. 6
Madison, WI 53713

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Mondale Delegates--D.C. Committee
1917 Randolph Street, N.E.
Washington, DC 20018

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

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

8504050420 1

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Arizona Mondale Delegate
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826 N. Central Avenue
Phoenix, AZ 85003

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11th Congressional District
Mondale Delegate Committee
520 S. El Camino Real
Suite 520
San Mateo, CA 94402

Ray Castell-Blanch, Treasurer
Mondale Delegate Election
Committee - 6th C D
1518 5th Avenue
San Rafael, CA 94901

Howard A. Roitman, Treasurer
Mondale Colorado Delegate
Selection Committee Statewide
2225 Birch Street
Denver, CO 80207

Susan K. Sweeney, Treasurer
37th Congressional District
Delegate Advisory Committee
1766 Camino Parocela
Palm Springs, CA 92262

Leon Shull, Treasurer
ADA Campaign Committee
1411 K. Street, N.W.
Washington, D.C. 20005

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14th C D For Mondale
5844 Western Way
Lake Worth, FL 33463

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7830 North Palafox Street
Pensacola, FL 35214

Jo Anna Conte, Treasurer
C D 2 Delegates For Mondale,
Florida
P.O. Box 10403
Tallahassee, FL 32302

8504042202

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P.O. Box 668, 3141 Howland Blvd.
Orange City, FL 32763

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Bradenton, FL 33529

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Delegates For Mondale
1310 West Colonial Drive
Suite 29
Orlando, FL 32804

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Congressional District 7
Delegates For Mondale
2925 Alline Avenue
Tampa, FL 33611

LaVaunne Miller, Treasurer
Congressional District 9
Delegates For Mondale
24 Meadow Lark Lane
Land O'Lakes, FL 33539

Samuel C. Catherwood, Treasurer
Delegates For Mondale
P.O. Box 8796
1100 Cesery Blvd
Jacksonville, FL 32211

Robert D. Parks, Treasurer
Mondale 15th District
Delegate Committee
440 S. Andrews Avenue
Ft Lauderdale, FL 33301

Angelique O. Stahl, Treausrer
Mondale 16th District Delegate
Committee
11621 N W 23rd Street
Pembroke Pines, FL 33026

8504050203

Sue Moore, Treasurer
Mondale Delegates
Congressional
District #8
94 Baywood Avenue
Clearwater, FL 33575

Melinda Greiner, Treasurer
Mondale Delegates, Congressional
District #13
1625 Winkler Avenue
Ft. Myers, FL 33901

Nancy Miller, Treasurer
Northern 12th Congressional
District Delegates For
Mondale
2129 S E Holland Street
Port St. Lucie, FL 33452

Robert A. Sugarman, Treasurer
South Florida Delegates For
Mondale
P.O. Drawer 520337
1951 N W 17th Avenue
Miami, FL 33152

Larry Laroco, Treasurer
Idaho Delegates For Mondale
537 W. Bannock
Suite 201
Boise, ID 83702

Elliott D. Hartstein, Treasurer
10th District Mondale Delegate
Committee
908 Providence Lane
Buffalo Grove, IL 60090

George Moser, Treasurer
12th District Mondale
Delegate Committee
2200 West Higgins Road
Hoffman Estates, IL 60195

Joan P. Murphy, Treasurer
13th Congressional District
Delegate Committee For
Walter F. Mondale
11601 South Pulaski
Alsip, IL 60658

3504042941

Jerome C. Shapiro, Treasurer
14th District Delegates For
Mondale
7 Pheasant Run
Dekalb, IL 60115

Herman L. Dammerman, Treasurer
15th District Delegates For
Mondale
1407 Hanson Drive
Normal, IL 61761

Frank G. Mabrey, Treasurer
16th Delegates For Mondale
1130 North Main
Rockford, IL 61103

Donna M. McWilliams, Treasurer
17th District Mondale Delegate
Committee
400 Rock Island Bank Building
P.O. Box 428
Rock Island, IL 61201

John S. Adkins, Treasurer
19th District Delegates
For Mondale Committee
2431 E. Harrison
Charleston, IL 61920

Georgia E. Trevan, Treasurer
1st Congressional District
Delegates For Walter Mondale
9401 South Michigan Avenue
Chicago, IL 60619

Bill Dempsey, Treasurer
20th C D Delegates For Mondale
P.O. Box 23
Forsyth, IL 62535

William H. Taylor, II, Treasurer
7th Congressional District Delegates
For Mondale
One IBM Plaza
Suite 4700
Chicago, IL 60611

Betty Donovan, Treasurer
Delegates For Mondale Committee
21st Congressional District
8A Potomac Drive
Fairview Heights, IL 62208

3504042035

Roman Lobodzinski, Treasurer
Eighth District Mondale Delegate
Committee
3055 N. Milwaukee
Chicago, IL 60618

Jean M. Foran, Treausrer
Eleventh District Mondale
Delegate Committee
6156 N. Knox
Chicago, IL 60646

James K. Polk, Treasurer
Mondale Delegates For the
Illinois 18th Committee
901 W. Brons
Peoria, IL 61604

Gregory A. Kinczewski, Treasurer
Ninth District Mondale Delegate
Committee
1226 N. Greenleaf
Evanston, IL 60202

Sheila A. Rivers, Treasurer
Second Congressional
District Delegates
For Mondale
11151 S. King Drive
Chicago, IL 60628

Jack L. Bright, Treasurer
Sixth District Mondale
Delegate Committee
478 Washington Street
Elmhurst, IL 60126

Lenore T. Colson, Treasurer
Third Congressional District
Delegates For Mondale
4312 West 107th Drive
Oak Lawn, IN 60453

Dan Watkins, Treasurer
Kansas Mondale At-Large
Delegate Committee
1645 Barker
Lawrence, KS 66044

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4th District Delegates
For Mondale
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Annapolis, MD 21401

3504042206

James M. Voss, Treasurer
First District Delegates
For Mondale
RD 1 Box 183
Denton, MD 21629

Lawrence M. Vincent, Treasurer
Mondale Delegate At-Large
Committee For MD
16 East Lombard Street-310 MD
Baltimore, MD 21202

Otto Unsinn, Treasurer
Montgomery County For
Mondale Delegate Committee
51 Monroe Street
Suite 1406
Rockville, MD 20850

Barbara Levin, Treasurer
Prince George's Delegates
For Mondale
3505 Burleigh Drive
Mitchellville, MD 20716

Joan Sanders Rudolph, Treasurer
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7119 Heathfield Road
Baltimore, MD 21212

Alma Bell, Treasurer
Seventh District Delegates
For Mondale
538 W.Lafayette
Baltimore, MD 21217

Thomas G. Slater, Treasurer
Sixth District Delegates For Mondale
198 Thomas Johnson Drive #10
Frederick, MD 21701

3504052207

Frank Lidinsky, Treasurer
Third District Delegates For Mondale
1035 S. Charles Street
Baltimore, MD 21230

Patricia Tallmadge, Treasurer
15th District Delegates For
Mondale Committee
34451 Harroun
Wayne, MI 48184

Marsha Murphy, Treasurer
Western Missouri Mondale
Delegates Committee
220 West Armour Boulevard
Kansas City, MO 64111

Helen Russell Allegrone, Treasurer
Guilford Delegates For Mondale
1803 Rolling Road
Greensboro, NC 27403

Heyward Davenport, Treasurer
16th C D Delegates For Mondale
1270 Fifth Avenue - 2R
New York, NY 10029

Stephen J. Wing, Treasurer
21st District Friends Of
Walter Mondale Delegates
94 Market Street
P.O. Box 910
Poughkeepsie, NY 12602Mr. Wing

Kevin Thompson, Treasurer
22nd Congressional District
Delegates For Mondale
130 North Main Street
New City, NY 10956Mr. Thompson

Ruben S. Gersowitz, Treasurer
23rd Congressional District
Delegates For Walter F. Mondale
11 North Pearl Street, Rm 1608
Albany, NY 12207Mr. Gersowitz

John E. McAuliffe, Treasurer
27th Congressional District
Delegates For Mondale
236 Erie Boulevard East
Syracuse, NY 13202Mr. McAuliffe

3504050420 3

Evelyn L. Rockas, Treasurer
28th Congressional District
Delegates For Mondale Committee
P.O. Box 61
Ithaca, NY 14851

Paul Gross, Treasurer
6th C D Delegates For
Mondale
92-03 Rockaway Beach Blvd
Rockaway Beach, NY 11693

Charlotte K. Scheman, Treasurer
7th C D Delegates For Mondale
143-53 Hoover Avenue
Briarwood, NY 11435

Benjamin Chevat, Treasurer
8th C D Delegates For Mondale
64-48 223rd Place
Bayside, NY 11364

Gerard J. Sweeney, Treasurer
9th C D Delegates For Mondale
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New Gardens, NY 11415

Thomas A. Fink, Treasurer
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Rochester, NY 14614

Lawrence Rosenweiz, Treasurer
Delegates For Mondale - Kings/
Richmond 11th C D
274 Lafayette Avenue
Brooklyn, NY 11238

Barbara Capon, Treasurer
Delegates For Mondale 13th
C D Kings/Richmond
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Brooklyn, NY 11235

Francis J. Kloster, Treasurer
Delegates For Mondale 25th District
1 Hartford Terrace
New Hartford, NY 13413

Mary Ellen Hunold, Treasurer
Delegates For Mondale-King/
Richmond 14th C D
157 Prescott Avenue
Staten Island, NY 10306

3 5 0 4 0 5 0 4 2 0 2

William Steinman, Treasurer
Delegates For Mondale 12th
C D Kings/Richmond
2044 E. 18th Street
Brooklyn, NY 11229

Kenneth C. Kruly, Treasurer
Erie County Delegates For Mondale
220 Delaware Avenue
Buffalo, NY 14202

Paul E. Haney, Treasurer
Haney, Mains, Rankin, Trobia,
Delegate Committee
% 3 Tacoma Street
Rochester, NY 14316

Diane M. Carr, Treasurer
L I - Mondale 2nd
Congressional District
P.O. Box 555
Lindenhurst, NY 11757

Craig Heller, Treasurer
Long Island Mondale 4th
C D Committee
2919 Bond Drive
Merrick, NY 11566

Jurgen Worthing, Treasurer
Long Island Mondale Committee
75 Weaving Lane
Wantagh, NY 11793

Barry M. McCoy, Treasurer
Long Island Mondale
First CD Delegates
49 Thompson Hay Path
Setauket, NY 11733

Ronald V. Iaboni, Treasurer
Lower Hudson Delegates For
Mondale
1 Fisher Drive
Mt. Vernon, NY 10552

Elizabeth Bolden, Treasurer
Mondale 17th CD Delegate
Committee
48A Hampton Place
Brooklyn, NY 11213

3504050421 0

Mr. Joseph Miller, Treasurer
Mondale 19th CD Delegate
Committee
100-7 Alcott Place
Bronx, NY 10475

Mary E. Gurnet, Treasurer
Naples-Mondale for President
Delegate Slate
Box 124
Clifton Park, NY 12065

Louis Nicolella, Treasurer
North Country Delegates for
Mondale
68 Third Street
Gloversville, NY 12078

Clifton R. Donaldson, Jr., Treasurer
Northern New York Delegates for Mondale
PO Box 127
Lake Clear, NY 12945

Elizabeth Tarpey, Treasurer
Sharpe/Jackson Delegates for
Mondale
92 Hillcrest Road
Mt. Vernon, NY 10552

Janet E. Bald, Treasurer
Southern Tier for Mondale
135 1/2 North 6th Street
Olean, NY 14760

Jeffrey George, Treasurer
17th District Mondale Delegate
Committee
445 Catalina Avenue
Youngstown, OH 44504

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for Mondale
607 Terrace Hilton
15 West 6th Street
Cincinnati, OH 45202

William D. Angel, Jr., Treasurer
4th District Mondale Delegate
Committee
1424 Lowell
Lima, OH 45805

Dorothy J. Sievers, Treasurer
Cuyahoga County Mondale Delegates Committee
14018 Clifford Avenue
Cleveland, OH 44135

8504050421

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Mondale Delegate Committee
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Scranton, PA 18503

Mae McHugh, Treasurer
11th Congressional Delegates
for Mondale
11 Bryden Street
Pittston, PA 18640

Louann Shrader, Treasurer
19th Congressional District
Delegates for Mondale Committee
RD 5 Box 259 Oakhill Drive
Hanover, PA 17331

Dolores C. Bross, Treasurer
21st Congressional District 1984
Delegates for Mondale
2807 Oakwood Street
Erie, PA 16508

Debbie O'Dell Seneca, Treasurer
22nd Congressional District
Delegate Committee for Mondale
335 North Main Street
Washington, PA 15301

Alice K. Gardan, Treasurer
3rd CD Delegates for Mondale
2707 Tolbut Street
Philadelphia, PA 19152

Elizabeth McCurdy, Treasurer
4th District Delegates for Mondale
1205 Eighth Avenue
PO Box 136
Beaver Falls, PA 15010

Nancy B. Baulis, Treasurer
7th Congressional District
Mondale Delegates
90 Barbara Road
Drexel Hill, PA 19026

Philip B. Ebersole, Treasurer
Delegate Committee for Mondale
16th Congressional District
Apartment #3
244 East Orange Street
Lancaster, PA 17602

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Kathleen Neary, Treasurer
Delegates for Mondale Committee
28 West Laughead Avenue
Boothwyn, PA 19061

Joseph P. Manko, Treasurer
Mondale 13th Delegate Committee
12th Floor Packard Building
Philadelphia, PA 19102

William H. Kerr, Treasurer
Mondale Delegate Committee -
12th Congressional District
303 South Warren Avenue
Apollo, PA 15613

Thomas E.Mellon, Jr, Treasurer
Mondale Delegate Team
East Court Street
Doylestown, PA 18901

Kathleen Smith, Treasurer
Mondale Delegates - 20th District
1032 S. Braddock Avenue
Pittsburgh, PA 15218

Lawrence P. Murin, Treasurer
Mondale Delegates Committe
422 Douglass Street
Reading, PA 19601

Gerard S. Ziegler, Treasurer
Ninth Congressional District
Delegates For Mondale
3332 Broad Avenue
Altoona, PA 16601

Richard Brabender, Treasurer
PA 14th Congressional District
Delegates For Mondale
3411 Library Road
Pittsburgh, PA 15234

Art Rooney, II, Treasurer
PA 18th Congressional District
Delegates For Mondale
1 Oxford Ctr, 40th fl
Pittsburgh, PA 15219

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Susan D. Carle, Treasurer
Pennsylvania 17th Congressional
District Delegates For Mondale
1037 Maclay Street
Harrisburg, PA 17103

Anthony McNeil, Treasurer
Second Congressional District
Delegates For Mondale
632 May Place
Philadelphia, PA 19139

Salvatore Mancini, Treasurer
1st District Delegate Committee
For Mondale
1910 Smith Street, Suite 9
N. Providence, RI 02911

Joseph DeLorenzo, Treasurer
2nd District Delegate Committee
For Mondale
1910 Smith Street, Suite 9
N. Providence, RI 02911

Roger Duncan, Treasurer
14th District Mondale
Delegate Committee
1407A Bridgeway
Austin, TX 78704

Millie Bruner, Treasurer
23rd District Mondale
Delegate Committee
2107 McKinney
Dallas, TX 75201

Frank Herrera, Treasurer
26th District Mondale Delegate
Committee
111 West Laurel, Suite 101
San Antonio, TX 78212

Melinda T. Vance, Treasurer
Tarrant County Delegate Committee
3901 Mockingbird Lane
Fort Worth, TX 76109

Ann M. Yarborough, Treasurer
Arlington Mondale Delegate
Committee
5140 North 37th Street
Arlington, VA 22207

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Paddi Valentine, Treasurer
Mondale 3rd District Delegate
Section Committee
Stockton Lane
Richmond, VA 23221

Meade Emory, Treasurer
At-Large Delegates For
Mondale
P.O. Box 21742
Seattle, WA 98111

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THE FOLLOWING MATERIAL IS BEING ADDED TO THE
PUBLIC FILE OF CLOSED MUR 1701 file folder #9

35040502216

Machinist Non-Partisan Political League and Eugene Glover, as treasurer; the Service Employees International Union COPE PCC and Richard W. Cordtz, as treasurer; the United Auto Workers V-CAP and Donald J. Moll, as treasurer; the Carpenters Legislative Improvement Committee and Patrick J. Campbell, as treasurer; the United Food and Commercial Workers Active Ballot Club and Anthony Lutty, as treasurer; and the United Mine Workers of America Coal Miners' PAC and John J. Banovic, as treasurer.

4. Take no further action against the Pennsylvania At-Large Delegates for Mondale Committee and Joanne Ciulla, as treasurer; the Pennsylvania 22nd Congressional District Delegates for Mondale Committee and Debbie O'Dell Seneca, as treasurer; the 1st District Delegate Committee for Mondale (RI) and Salvatore Mancini, as treasurer; and the 2nd District Delegate Committee for Mondale (RI) and Joseph DeLorenza, as treasurer

5. Close the file as to all respondents.

6. Approve the sample notification letters to the complainants and the respondents as recommended in the General Counsel's report dated November 16, 1984.

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

Attest:

11-29-84
Date

Marjorie W. Emmons
Secretary of the Commission

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FEDERAL ELECTION COMMISSION

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

END OF ADDITIONAL MATERIAL FOR CLOSED MUR 1704.
file folder #9

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HAND DELIVERED

84 MAY 18 P3:21

BEFORE THE
FEDERAL ELECTION COMMISSION

THE NATIONAL RIGHT TO WORK COMMITTEE) MUR 1704
)
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,)
)

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and)
)
UNITED MINE WORKERS OF AMERICA)
COAL MINERS PAC,)
)
Respondents.)

COMPLAINT

Complainants, The National Right to Work Committee (the "Committee") and Ralph Martin (Bud) Hettinga, Jr., request an investigation of the matters alleged herein pursuant to 2 U.S.C. § 437g. The Committee's address is 8001 Braddock Road, Suite 500, Springfield, Virginia 22160, and its phone number is 703-321-9820. Mr. Hettinga's address is 645 Compress Road, Las Cruces, New Mexico 88001, and his phone number is 505-524-3551.

Respondents are Walter F. Mondale and Mondale for President Campaign Committee, 2201 Wisconsin Avenue, N.W., Washington, D.C. 20007, AFL-CIO COPE Political Contribution Committee, 815 16th Street, N.W., Washington, D.C. 20006, AFSCME Public Employees Organized to Promote Legislative Equality QUALIFIED, 1625 L Street, N.W., Washington, D.C. 20036, American Federation of Teachers COPE, 11 Dupont Circle, N.W., Washington, D.C. 20036, United Food and Commercial Workers Active Ballot Club, 1775 K Street, N.W., Washington, D.C. 20006, International Union of Bricklayers and Allied Craftsmen PAC, 815 15th Street, N.W., Washington, D.C. 20005, Carpenters Legislative Improvement Committee, 101 Constitution Avenue, N.W., Washington, D.C. 20001, Ironworkers Political Action League, 1750 New York Avenue, N.W.,

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Washington, D.C. 20006, Machinists Non-Partisan Political League, 1300 Connecticut Avenue, N.W., Washington, D.C. 20036, Amalgamated Clothing and Textile Workers Union PAC, 15 Union Square, New York, N.Y. 10003, CWA-COPE PCC, 1925 K Street, N.W., Washington, D.C. 20006, Service Employees International Union COPE PCC, 2020 K Street, N.W., Washington, D.C. 20006, UAW V CAP, 8000 East Jefferson, Detroit, MI 48214, and United Mine Workers of America Coal Miners PAC, 900 15th Street, N.W., Washington, D.C. 20005.

This Complaint, filed on information and belief, is based on affidavits of private investigators and reports which have appeared in the media, which are attached hereto and incorporated herein by reference, as well as on FEC reports and on information discovered by William A. Wilson, an officer of the Committee.

Respondents have engaged in a concerted effort to circumvent the contribution limitations established by Congress in the Federal Election Campaign Act, as amended, by funneling excessive contributions through Mondale "delegate committees" which, in actuality, have been branch offices of the Mondale campaign. The evidence shows that Mondale campaign officials helped establish the "delegate committees" and selected the delegates, that Mondale campaign workers staffed the "delegate committees", and that the Mondale campaign controls the "delegate committees", all of which establish that the Mondale campaign and his "dele-

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gate committees" are and have been affiliated within the meaning of 11 C.F.R. § 100.5(g) and, therefore, are and have been subject to a single limit on the receipt of contributions.

The evidence further demonstrates that Respondent union PACs have coordinated their efforts to support Mondale's "delegate committees" and have engaged in similar patterns of contributions to the "delegate committees", which establish that the union PACs are and have been affiliated within the meaning of 11 C.F.R. § 100.5(g). All of the Respondent union PACs, taken together, therefore, are and have been subject to a single limit on contributions made to Mondale and his "delegate committees". Alternatively, and at a minimum, each Respondent union PAC, individually, is and has been subject to a single limit on contributions to Mondale and his "delegate committees". Nonetheless, each Respondent union PAC has contributed more than $5,000 to the Mondale "delegate committees", in violation of the contribution limits set by the Act.

Press reports carried the first indications that Mondale's "delegate committees" were not truly autonomous, as demonstrated by the following: (1) "Mondale's Cute Trick on Finances," Baltimore Sun (4/15/84); (2) "Mondale Says PAC Aid to Delegates Ebbing," The Washington Post (4/24/84); (3) "Committees for Mondale Share Money and Staff," The Washington Post (4/25/84); (4) "Jackson Assails PAC Ties," The Washington Post (4/25/84); (5) "Democrat Reformers PAC It In," The Washington Times (4/25/84); (6) "Mondale Directs Disputed Groups to End

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Operation," The New York Times (4/26/84); (7) "The More Mondale Flails, the Deeper He Gets Into PAC Mess," The Washington Post (4/26/84); (8) "Mondale PACs It In," Richmond Times Dispatch (4/27/84); (9) "Mondale Agrees to Return Disputed Funds," The Washington Post (4/28/84); (10) "How PAC-Man Pulled It Off," Richmond Times-Dispatch (4/28/84); and (11) "Mr. Mondale Un PACs," The New York Times (4/29/84). (Attachments A-1 through A-17.)

These news accounts reflect, among other things, that Mondale staff instructed the "delegate committees" on how to organize and operate; that Mondale staff were transferred to the "delegate committees"; that "delegate committees" took the place of the national Mondale committee (in Pennsylvania); that Mondale reacted to criticism of the "delegate committee" operation by writing a letter urging them not to accept PAC contributions -- and PAC contributions stopped; that Mondale's Office of the Legal Counsel was made available to advise the "delegate committees"; that the head of the Mondale Delegates D.C. Committee admitted that the "delegate committee" was organized with assistance from the Mondale national campaign office and was the principal finance committee for Mondale in the District of Columbia; that funds were transferred from a "delegate committee" in one state to a sister group in another; that some registration statements for different "delegate committees" were written by the same person and mailed in envelopes apparently typed on the same

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typewriter, while also reporting joint spending at the same print shops; and that "delegate committees" started disbanding after Mondale gave orders to do so.

The coordination and control reflected in these news reports is confirmed by the reports of private investigators appended hereto as Attachments B through K. According to the investigative reports, paid Mondale staff (identified by a gold pin in the shape of a map of Pennsylvania with the imprinted name of "Mondale") were coordinating operations at the Philadelphia, Pennsylvania, Mondale At-Large Delegate Committee offices, as well as at the Upper Darby, Pennsylvania, Democratic Party office. These personnel were observed moving between the "delegate committee" office and Mondale's traveling headquarters which was located in an adjacent hotel, the Bellevue Stratford. Some of them even stayed at the Bellevue Stratford. Some of these personnel were to go to other locations after the Pennsylvania primary (Washington, Texas and California). In the same "delegate committee" office, campaign material from the Oklahoma and Illinois races was found, as well as material from the Pennsylvania Second Congressional Delegates for Mondale committee, the Pennsylvania AFL-CIO COPE, the national AFL-CIO COPE, and Mondale for President. Some of the staff referred to their paychecks as "Mondale paychecks." The president of the Delaware County Pennsylvania AFL-CIO Council appears to have visited the Upper Darby Democratic Party office to confer with Mondale campaign staffers.

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In addition, many union-PAC contributions to the "delegate committees" appear to have been coordinated. The following is a schedule of certain contributions, taken from FEC filings:

AFL-CIO COPE

Recipient	Date	Amount
Mondale 15th District Delegate Committee -- Ft. Lauderdale, FL	3/9/84	3,000
South Florida Delegates for Mondale -- Miami, FL	3/9/84	1,000
Mondale Delegates Congressional District Eight -- Clearwater, FL	3/9/84	1,000
Delegates Committee with Mondale -- San Juan, PR	3/12/84	5,000
19th District Mondale Delegate Committee -- Charleston, IL	3/15/84	3,200
17th District Mondale Delegate Committee -- Rock Island, IL	3/15/84	3,200
22nd District Mondale Delegate Committee -- Cobden, IL	3/15/84	3,200
Mondale Delegates D.C. -- Washington, D.C.	3/16/84	600
		$20,200

AFSCME PUBLIC EMPLOYEES ORGANIZED TO PROMOTE LEGISLATIVE EQUALITY QUALIFIED

Recipient	Date	Amount
Mondale Delegates Congressional District Thirteen -- Naples, FL	2/22/84	1,000
Congressional District Five Delegates for Mondale -- Orlando, FL	2/22/84	1,000

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Congressional District Two Delegates for Mondale -- Tallahassee, FL	2/22/84	1,000
Eleventh Congressional District Mondale Delegate Committee -- Chicago, IL	2/29/84	1,000
Ninth Congressional District Mondale Delegate Committee -- Evanston, IL	2/17/84	2,000
Third Congressional District Mondale Delegate Committee -- Oak Lawn, IL	2/17/84	2,000
First District Delegates for Mondale -- Merrimack, NH	2/10/84	5,000
15th District Delegates for Mondale -- Lincoln, IL	2/10/84	5,000
First Congressional District Mondale Delegate Committee -- N. Providence, R.I.	3/12/84	2,500
Mondale 16th District Delegate Committee -- Ft. Lauderdale, FL	3/12/84	2,000
Delegates for Mondale 3rd Cong. District -- Jacksonville, FL	3/12/84	2,000
Second Cong. District Mondale Delegate Committee -- N. Providence, R.I.	3/12/84	2,500
Mondale Delegates -- D.C. Washington, D.C.	3/7/84	1,000
South Florida Delegates for Mondale -- Miami, FL	3/7/84	5,000
Congressional District Seven Delegates for Mondale -- Tampa, FL	3/1/84	1,000
11th C.D. Delegates for Mondale -- Brooklyn, N.Y.	3/23/84	510

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9th C.D. Delegates for Mondale -- Kew Gardens, N.Y.	3/23/84	375
8th C.D. Delegates for Mondale -- Bayside, N.Y.	3/23/84	110
7th C.D. Delegates for Mondale -- Briarwood, N.Y.	3/23/84	45
6th C.D. Delegates for Mondale -- Rockaway Beach, N.Y.	3/23/84	1,410
Long Island Mondale 4th C.D. -- Garden City, N.Y.	3/23/84	2,055
North County Delegates for Mondale -- Gloversville, N.Y.	3/23/84	1,210
The Mondale Team -- N. Tonawanda, N.Y.	3/23/84	1,215
Southern Tier Committee for Mondale -- Olean, N.Y.	3/23/84	500
6th C.D. Delegates for Mondale -- Far Rockaway, N.Y.	3/23/84	500
19th C.D. Delegate Committee for Mondale -- Bronx, N.Y.	3/23/84	925
18th C.D. Delegates Committee for Mondale -- Bronx, N.Y.	3/23/84	350
15th C.D. Delegates Coalition for Mondale -- New York, N.Y.	3/23/84	960
17th C.D. Mondale Delegate Committee -- Brooklyn, N.Y.	3/23/84	860
16th C.D. Delegates for Mondale -- New York, N.Y.	3/23/84	335
14th C.D. Delegates for Mondale -- Staten Island, N.Y.	3/23/84	355
13th C.D. Delegates for Mondale -- Brooklyn, N.Y.	3/23/84	15
12th C.D. Delegates for Mondale -- Brooklyn, N.Y.	3/23/84	510

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Mondale 19th C.D. Delegate Committee -- Bronx, N.Y.	3/23/84	300
Mondale 18th C.D. Delegate Committee -- Bronx, N.Y.	3/23/84	50
Mondale 17th C.D. Delegate Committee -- New York, N.Y.	3/23/84	750
15th C.D. Delegate Coalition for Mondale -- New York, N.Y.	3/23/84	750
Delegates for Mondale - 14th C.D. -- Staten Island, N.Y.	3/23/84	250
At-Large Delegate Committee for Mondale -- New York, N.Y.	3/23/84	5,000
Delegates for Mondale 11th C.D. -- Brooklyn, N.Y.	3/23/84	250
9th C.D. Delegates for Mondale -- Kew Gardens, N.Y.	3/23/84	250
8th C.D. Delegates for Mondale -- Bayside, N.Y.	3/23/84	500
23rd Congressional Dist. Delegates Committee for Mondale -- Albany, N.Y.	3/23/84	845
Naples - Mondale for President Slate -- Clifton Park, N.Y.	3/23/84	715
Delegates for Mondale 25th C.D. -- New Hartford, N.Y.	3/23/84	775
Lower Hudson Delegates for Mondale -- Mt. Vernon, N.Y.	3/23/84	565
New Hampshire 2nd Congressional District Delegates for Mondale -- Allentown, N.H.	3/23/84	1,350
2nd C.D. Delegates for Mondale -- Philadelphia, PA	3/24/84	1,000
21st Mondale Delegate Committee -- Erie, PA	3/23/84	1,500
23rd C.D. Mondale Delegates -- Oil City, PA	3/23/84	1,000

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Wisconsin At-Large Delegate Committee -- Madison, WI	3/24/84	5,000
Pennsylvania At-Large Delegates for Mondale -- Philadelphia, PA	3/23/84	5,000
16th C.D. Delegates for Mondale -- New York, N.Y.	3/23/84	500
Delegates for Mondale - 12th C.D. -- Brooklyn, N.Y.	3/23/84	250
TOTAL:		$72,840

AMERICAN FEDERATION OF TEACHERS COPE

Recipient	Date	Amount
Mondale Delegates D.C. -- Washington, D.C.	3/19/84	500
Delegates for Mondale 3rd Congressional District -- Jacksonville, FL	2/13/84	2,000
Congressional District 6 Delegates for Mondale -- Ocala, FL	2/16/84	500
Congressional District 9 Delegates for Mondale -- Land O'Lakes, FL	2/17/84	2,000
Fourth Congressional District Mondale Delegates Committee -- New Lenox, IL	3/2/84	1,000
Seventh Congressional District Mondale Delegates Committee -- Chicago, IL	3/16/84	1,500
Montana At-large Delegates for Mondale Committee -- Helena, MT	3/21/84	1,000
New Hampshire First District Delegates for Mondale -- Merrimack, N.H.	2/9/84	5,000

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Long Island Mondale First Congressional District Delegates -- Setauket, N.Y.	3/22/84	2,000
Naples Mondale for President Slate - 24th Congressional Dist. -- Clifton Park, N.Y.	3/22/84	1,300
New York State At-large Delegates Committee for Mondale -- New York, N.Y.	3/22/84	5,000
7th Congressional District Delegates for Mondale -- Briarwood, N.Y.	3/23/84	500
9th Congressional District Delegates for Mondale -- Kew Gardens, N.Y.	3/23/84	250
10th Congressional District Delegates for Mondale -- Brooklyn, N.Y.	3/23/84	500
Delegates for Mondale - 12th Congressional District -- Brooklyn, N.Y.	3/23/84	250
Delegates for Mondale - 11th Congressional District -- Brooklyn, N.Y.	3/23/84	250
Delegates for Mondale - 14th Congressional District -- Staten Island, N.Y.	3/23/84	250
15th Congressional District Delegates Coalition for Mondale -- New York, N.Y.	3/23/84	750
Mondale 17th Congressional District Delegates Committee -- New York, N.Y.	3/23/84	750
Mondale 19th Congressional District Delegates Committee -- Bronx, N.Y.	3/23/84	300
28th Congressional District Delegates for Mondale -- Ithaca, N.Y.	3/22/84	2,000

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West New York Elect Mondale Committee - 31st Congressional District -- Williamsville, N.Y.	3/22/84	3,000
Mondale Team - 32nd Congressional District -- North Tonawanda, N.Y.	3/22/84	3,000
Southern Tier Committee for Mondale - 34th Congressional District -- Olean, N.Y.	3/22/84	1,500
Pennsylvania At-large Delegates for Mondale Committee -- Philadelphia, PA	3/21/84	5,000
Second Congressional District Delegates for Mondale Committee -- Philadelphia, PA	3/21/84	500
Third Congressional District Delegates for Mondale Committee -- Philadelphia, PA	3/21/84	1,500
Tenth Congressional District Delegates for Mondale Committee -- Scranton, PA	3/21/84	1,000
Fourteenth Congressional District Delegates for Mondale Committee -- Pittsburgh, PA	3/21/84	2,000
Congressional District 11 Delegates for Mondale -- Rockledge, FL	2/27/84	500
Northern Congressional District 12 Delegates for Mondale -- St. Lucie, FL	2/27/84	500
14th Congressional District Delegates for Mondale -- Lake Worth, FL	2/16/84	500
Mondale 15th District Delegate Committee -- Ft. Lauderdale, FL	2/16/84	1,500
South Florida Delegates for Mondale -- Miami, FL	2/21/84	2,000
Delegates for Mondale Committee (Sixth Congressional District) -- Elmhurst, IL	2/15/84	1,000

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Delegates for Mondale Committee (First Congressional District) -- Chicago, IL	2/15/84	1,000
Delegates for Mondale Committee (Second Congressional District) -- Chicago, IL	2/15/84	1,000
Delegates for Mondale Committee (Third Congressional District) -- Oak Lawn, IL	2/15/84	1,000
TOTAL:		$54,100

UNITED FOOD & COMMERCIAL WORKERS ACTIVE BALLOT CLUB

Recipient	Date	Amount
Mondale 2nd C.D. Delegate Recruitment Committee -- Virginia Beach, VA	3/20/84	5,000
Kentucky At-Large Mondale Committee -- Lexington, KY	3/21/83	5,000
Pennsylvania At-Large Delegates for Mondale Committee -- Philadelphia, PA	3/22/84	5,000
New York State At-Large Delegate Committee for Mondale -- New York, N.Y.	3/23/84	5,000
Committee for Western New York Mondale Delegates -- Rochester, N.Y.	3/23/84	2,000
New Hampshire 2nd District Delegates for Mondale -- Allenstown, N.H.	2/23/84	5,000
TOTAL:		$27,000

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INTERNATIONAL UNION OF BRICKLAYERS AND ALLIED CRAFTSMEN PAC

Recipient	Date	Amount
New Hampshire First District Delegates for Mondale -- Merrimack, N.H.	2/9/84	5,000
Illinois 7th District Mondale Delegate Committee -- Chicago, IL	3/1/84	500
Pennsylvania 18th Cong. District Delegates for Mondale -- Pittsburgh, PA	3/21/84	3,000
Pennsylvania At-Large Delegates for Mondale -- Philadelphia, PA	3/21/84	2,000
TOTAL:		$10,500

CARPENTERS LEGISLATIVE IMPROVEMENT COMMITTEE

Recipient	Date	Amount
20th District Delegates for Mondale -- Decatur, IL	2/29/84	5,000
South Florida Delegates for Mondale -- Miami, FL	3/15/84	1,000
Committee for Western New York Democratic Delegates -- Rochester, N.Y.	3/20/84	2,000
22nd Congressional District Delegates for Mondale -- New City, N.Y.	3/29/84	2,000
Mondale's Team -- N. Tonawanda, N.Y.	3/29/84	1,000
TOTAL:		$11,000

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IRONWORKERS POLITICAL ACTION LEAGUE

Recipient	Date	Amount
3rd C.D. of Illinois Mondale Delegate Committee -- Oak Lawn, IL	3/14/84	5,000
New York State At-Large Delegate Committee Mondale -- New York, N.Y.	3/28/84	1,000
New York State At-Large Delegate Committee Mondale -- New York, N.Y.	3/28/84	1,000
New York State At-Large Delegate Committee Mondale -- New York, N.Y.	3/28/84	1,000
New York State At-Large Delegate Committee Mondale -- New York, N.Y.	3/28/84	1,000
New York State At-Large Delegate Committee Mondale -- New York, N.Y.	3/28/84	1,000
Pennsylvania At-Large Delegates for Mondale -- Philadelphia, PA	3/28/84	2,000
Pennsylvania At-Large Delegates for Mondale -- Philadelphia, PA	3/28/84	1,000
Pennsylvania At-Large Delegates for Mondale -- Philadelphia, PA	3/28/84	1,000
Pennsylvania At-Large Delegates for Mondale -- Philadelphia, PA	3/28/84	1,000
TOTAL:		$15,000

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MACHINISTS NON-PARTISAN POLITICAL LEAGUE

Recipient	Date	Amount
Philadelphia Democratic County Exec. Cmtee.* -- Philadelphia, PA	3/23/84	5,000
N.Y. At-Large Delegate Committee for Mondale -- New York, NY	3/23/84	5,000
14th C.D. Delegates for Mondale -- Pittsburgh, PA	3/23/84	2,500
Montgomery County Mondale Delegate Committee -- Rockville, MD	3/23/84	500
Northern N.Y. Delegates for Mondale -- Lake Clear, NY	3/26/84	1,000
TOTAL:		$14,000

*Designated to Mondale Delegate Slate

AMALGAMATED CLOTHING AND TEXTILE WORKERS UNION PAC

Recipient	Date	Amount
New Hampshire First District Delegates for Mondale -- Merrimack, N.H.	2/16/84	5,000
Illinois 7th Congressional District Delegates for Mondale -- Chicago, IL	3/8/84	1,000
The Committee for Western New York Democratic Delegates -- Rochester, N.Y.	3/20/84	1,000
The Committee for Western New York Democratic Delegates -- Rochester, N.Y.	3/23/84	1,000
New York State At-Large Delegate Committee for Mondale -- New York, N.Y.	3/23/84	2,500

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* 7th Congressional District Delegates for Mondale Committee -- Chicago, IL	3/14/84	4,000
TOTAL:		$14,500

*Chicago and Central States affiliate.

CWA COPE PCC

Recipient	Date	Amount
New Hampshire 2nd District Delegates for Mondale -- Allentown, NH	2/10/84	5,000
Long Island Mondale Delegate Committee -- Mantaugh, N.Y.	3/20/84	2,500
The Mondale Team -- N. Tonawanda, N.Y.	3/26/84	500
2nd Congressional District Candidate Mondale Committee -- Chicago, IL	3/2/84	1,000
S. Florida Delegates for Mondale -- Miami, FL	3/5/84	1,000
5th Congressional District for Mondale -- Orlando, FL	3/5/84	1,000
Delegates for Mondale 3rd C.D. -- Jacksonville, FL	3/8/84	1,000
Wisconsin At-large Mondale Delegate -- Madison, WI	3/21/84	5,000
Wisconsin 5th C.D. Mondale Delegate Committee -- Milwaukee, WI	3/21/84	5,000
New York State At-large Delegate Committee -- New York, NY	3/23/84	5,000
Pennsylvania At-large Delegates for Mondale -- Philadelphia, PA	3/23/84	5,000
TOTAL:		$32,000

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SERVICE EMPLOYEES INTERNATIONAL UNION COPE PCC

Recipient	Date	Amount
11th District Mondale Delegate Committee -- Chicago, IL	2/24/84	1,000
6th District Delegates for Mondale -- Marble Head, MA	3/5/84	500
Mondale Delegate Committee 12th C.D. -- Apollo, PA	3/19/84	1,000
New York State At-large Delegate Committee for Mondale -- New York, NY	3/22/84	5,000
Pennsylvania 17th C.D. Delegates for Mondale Committee -- Harrisburg, PA	3/26/84	1,000
Pennsylvania At-large Delegates for Mondale -- Philadelphia, PA	3/22/84	4,000
TOTAL:		$12,500

UAW V CAP

Recipient	Date	Amount
20th District Mondale Delegate Committee -- Forsyth, IL	2/14/84	2,000
16th District Mondale Delegate Committee -- Rockford, IL	2/14/84	2,000
19th District Mondale Delegate Committee -- Charleston, IL	2/14/84	2,000
17th District Mondale Delegate Committee -- Rock Island, IL	2/14/84	2,000
18th District Mondale Delegate Committee -- Peoria, IL	2/14/84	2,000
12th District Mondale Delegate Committee -- Hoffman Estates, IL	2/14/84	2,000

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New Hampshire Second District Delegates for Mondale -- Allenstown, NH	2/14/84	5,000
Sixth District Delegates for Mondale Committee -- Lansing, MI	3/15/84	3,000
New York State At-large Committee for Mondale -- New York, NY	3/23/84	5,000
Pennsylvania At-large for Mondale -- Philadelphia, PA	3/23/84	5,000
TOTAL:		$30,000

UMWA COAL MINERS PAC

Recipient	Date	Amount
22 C.D. Delegates for Mondale Committee -- Cobden, Ill	2/16/84	200
New Hampshire 2nd District Delgates for Mondale -- Allenstown, NH	2/22/84	5,000
Illinois 22nd C.D. Delegates for Mondale Committee -- Cobden, Ill	2/28/84	4,800
22nd Congressional District Delegates for Mondale -- Washington, PA	3/21/84	5,000
12th Congressional District Delegates for Mondale -- Apollo, PA	3/21/84	5,000
Kentucky at Large Mondale Delegates Committee -- Lexington, KY	3/21/84	5,000
Mondale 3rd Dist. Delegates Selection Committee -- Richmond, VA	3/21/84	5,000
TOTAL:		$30,000

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As shown, above, AFSCME's PAC made two contributions for $2,500 each to the Rhode Island First and Second Congressional District Mondale Delegate Committees. These two "delegate committees" filed a consolidated report on April 16, 1984, admitting they were "affiliated," but on their respective Statements of Organization, they had denied any affiliations.

The Mondale "delegate committees" for Illinois' first, second and seventh congressional districts provide a clear and unambiguous example of the coordination that has existed between the Mondale campaign and Mondale's "delegate committees". Donald G. Gross, on the Illinois State Staff for Mondale's official campaign, transmitted the Statements of Organization for these three committees to the FEC, using "Mondale for President" stationery and an "Illinois for Mondale" envelope. The first reports of these "delegate committees", filed in March 1984, were all sent in "Illinois for Mondale" envelopes, and those of the first and seventh congressional district committees appear to have been addressed by the same person.

The Ironworkers' PAC contributions in Pennsylvania raise additional questions about the extent of coordination taking place with respect to the Mondale "delegate committees". On March 28, the Ironworkers made out four separate checks to Pennsylvania At-Large Delegates for Mondale, one for $2,000 and three for $1,000 each. In its report filed on April 15, Pennsylvania At-Large Delegates for Mondale did not report the receipt of a single check from the Ironworkers. On the other hand,

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Pennsylvania's 21st Congressional Delegates for Mondale report a $1,000 contribution from the Ironworkers on March 28, even though the Ironworkers report no such contribution to them.

Serious questions must be raised about whether Respondent union PACs have become affiliated with the Mondale "delegate committees" and the Mondale campaign. The Mondale 16th District Delegate Committee in Florida has as its Assistant Treasurer and Custodian of Records an individual by the name of Frank C. Ortis. The envelope in which this "delegate committee's" Statement of Organization was mailed bears a return address of "Mr. Frank Ortis, Broward County AFL-CIO. . . ." Twenty-four percent of this "delegate committee's" funds reported in April came from one of the Respondent union PACs, AFSCME. An additional twelve percent came from a New Hampshire "delegate committee".

The 22nd Congressional District Delegates for Mondale in Cobden, Illinois, rented office space from the Machinists, paid two individuals' salary and gas reimbursement by transmitting it through "Mondale for President" in Washington, D.C., and received thirty-nine percent of their March income from a Respondent union PAC, AFL-CIO COPE, all of which is reflected in their report filed on April 17. In addition, the envelope used to transmit this "delegate committee's" first report to the FEC (filed in March) is an "Illinois for Mondale" envelope which appears to have been addressed by the same person who addressed Illinois first and seventh "delegate committee" envelopes, as discussed above.

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The affidavit of a Committee investigator, Attachment K, establishes that, in Chicago, the Textile Workers Union was operating in close cooperation with the Mondale campaign.

Illinois "delegate committees" received a significant part of their funds from Respondent union PACs, for example: Third District (March 7 -- 82%); Fourth District (April 17 -- 54%); 6th District (March 7 -- 53%); 7th District (April 19 -- 100%, when transfers from "delegate committees" in New Hampshire are included); Ninth District (March 7 -- 29%); Eleventh District (March 7 -- 62%); and 12th District (March 7 -- 100%). Many of the Illinois "delegate committees" had their printing done at the same company: Progress Printing, located at 3324 South Halsted Street, Chicago, Illinois 60608. Needless to say, some of the printed materials were remarkably similar to those of the Mondale campaign. (See, Attachments D (Exhibit 6) and L.)

This Illinois contribution pattern was repeated in Pennsylvania, for example: Second District (April 19 -- 100%); Seventh District (April 18 -- 100%, including contributions from a Carpenters' local and contributions from other "delegate committees"); 12th District (April 18 -- 89%); 13th District (April 16 -- 94%, including contributions from other "delegate committees"); Seventeenth District (April 16 -- 93%); and Reading (April 16 -- 73%). In their report filed on April 23, 1984, Pennsylvania's 22nd Congressional District Delegates for Mondale list two contributions totaling $7,000, but do not disclose the identity of the contributors.

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AFL-CIO COPE held a meeting on March 22, 1984. The meeting, chaired by John Perkins, Executive Director of AFL-CIO COPE, was attended by representatives of fifteen or sixteen unions. Thirty-nine percent of the delegate committee contributions made by Respondent union PACs during February and March 1984 were made on or within seven days of that meeting.

On March 28, 1984, William A. Wilson, who is signing this Complaint as an Officer of the Committee, telephoned the 2nd District Mondale Delegate Committee office at 312-368-1984. His call was answered by a recording which stated that the number had been disconnected and that calls were being taken at 202-625-1600, the number for the Mondale campaign headquarters in Washington, D.C.

Walter F. Mondale has demonstrated an ability to control the decisions of those individuals who have the apparent power to direct the Mondale "delegate committees". Mondale campaign staff helped form his "delegate committees" and then helped staff them. Mondale "delegate committee" staff have coordinated their efforts with those of the Mondale campaign staff. The Mondale "delegate committees" are, therefore, affiliates of the Mondale campaign and, together with the Mondale campaign, share one limit of $5,000 which they may receive from any one union PAC, and its affiliates, for any one election.

AFL-CIO COPE has coordinated with fifteen or sixteen union PACs, apparently in connection with the funding of the Mondale "delegate committees." This coordination requires that all of

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these union PACs be treated as affiliates and limited to a single, aggregate, $5,000 contribution to the Mondale campaign, including the Mondale "delegate committees." Not only does the aggregate amount contributed by Respondent union PACs greatly exceed this $5,000 limit, but also, the aggregate amount contributed individually by the Respondent union PACs exceeds $5,000.

For the reasons stated, Complainants pray that the Commission rule:

(1) That the Mondale "delegate committees" are affiliated with each other and with the Mondale campaign and, therefore, the Mondale campaign and its "delegate committee" affiliates are and have been entitled to accept no more than $5,000, in the aggregate, from any union PAC or its affiliates;

(2) That Respondent union PACs are affiliated with each other and, therefore, are and have been entitled to contribute no more than $5,000, in the aggregate, to the Mondale campaign and its "delegate committee" affiliates, or, at a minimum and in the alternative, that Respondent union PACs (together with their state, regional and local affiliates) are and have been entitled to contribute no more than $5,000 each to the Mondale campaign and its "delegate committee" affiliates; and

(3) That the excessive contributions in this case were made knowingly and willfully in an effort to avoid the

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consequences of Mondale's profligate spending in the early days of his campaign.

Complainants pray that Mondale be ordered to return the xcessive contributions and that Mondale and the Respondent nions each be ordered to pay the maximum civil penalty for a nowing and willful violation.

THE NATIONAL RIGHT TO WORK COMMITTEE

By: William A Wilson
William A. Wilson, Vice President

The foregoing Complaint was subscribed and sworn to before me his 16th day of May, 1984, by William A. Wilson as Vice President f The National Right to Work Committee.

Lorraine A. Colson
Notary Public

My Commission expires on November 30, 1987

Bud Hettinga
Ralph Martin (Bud) Hettinga, Jr.

The foregoing Complaint was subscribed and sworn to before me his 17th day of May, 1984, by Ralph Martin (Bud) Hettinga, Jr.

Pamela M Ford
Notary Public

My Commission expires on 1/5/87

consequences of Mondale's profligate spending in the early days of his campaign.

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THE NATIONAL RIGHT TO WORK COMMITTEE

By: William A Wilson
William A. Wilson, Vice President

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Lorraine G. Colson
Notary Public

My Commission expires on November 30, 1987

Bud Hettinga
Ralph Martin (Bud) Hettinga, Jr.

The foregoing Complaint was subscribed and sworn to before me this 17th day of May, 1984, by Ralph Martin (Bud) Hettinga, Jr.

Pamela M Ford
Notary Public

My Commission expires on 1/5/87

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National Institute
For
Labor Relations Research

BALTIMORE SUN
APRIL 15, 1984

Mondale's cute trick on finances

Washington

As the campaign of Walter Mondale presses on in its quest for the 1984 Democratic presidential nomination, too little attention is being paid to its possibly legal but disingenuous use of a loophole in the federal campaign finance law that is helping the campaign cope with its money problems.

Under a 1979 Federal Election Commission regulation, committees may be formed to raise and spend money in behalf of individuals running to be delegates to a party's national convention. The money thus raised may be used only for grass-roots political activity such as the purchase and distribution of leaflets, bumper stickers and buttons to help elect those delegates.

The regulation stipulates that the funds raised and spent by such committees will not be charged against the federal limit imposed on the presidential candidate in whose name they are running as long as their activities are not part of the candidate's own campaign.

In the Illinois, New York and Pennsylvania primaries, there is ample evidence, despite disclaimers from Mr. Mondale's managers, that such delegate committees were set up in concert with the national Mondale campaign and staffed with Mondale organizers transferred to or picked up by those committees.

The obvious advantage was to relieve the national campaign of the need to finance grass-roots activity in these states out of its treasury, which is subject to the federal limit and because of heavy early spending is approaching that ceiling. In Pennsylvania, the national Mondale committee had no offices in the state; all were designated Delegates-for-Mondale Committees and paid for out of funds raised by such delegate committees.

Individuals who have contributed the maximum allowed of $1,000 to a presidential candidate may give a like amount to any number of such delegate committees. Mr. Mondale's strategists insist this hasn't happened to any notable degree. If not, after going to all the trouble of using this loophole, Mr. Mondale ought to be looking for a new fund-raiser.

Another advantage of this arrangement when invoked was that the delegate committees could — and did — take contributions from labor union and other political action committees (PACs) without Mr. Mondale technically violating his public pledge not to accept any such PAC money.

This rank hypocrisy continued until the matter became public. Mr. Mondale reiterated his no-PAC-money stand and said he wished the delegate committees wouldn't take it, and reportedly the practice has now ceased or at least greatly diminished. But if you believe the early acceptance of labor PAC money was an inadvertence, let us introduce you to the Easter Bunny.

In the Pennsylvania primary just concluded, the Delegates-for-Mondale coordinator in Pittsburgh, John O'Leary, estimated that more than half of the funds at his disposal came from labor PACs.

Mr. Mondale's campaign chairman, James Johnson, says the criticism of the delegate committees misses the mark because the Mondale campaign will have no trouble staying within the federal spending limit, which by his calculations leaves the campaign with more than $6 million to spend until the July convention. But a few weeks ago, when the Gary Hart phenomenon blind-sided the Mondale campaign, the outlook for Mr. Mondale clinching the nomination in advance of the convention, thus reducing the money pressures, did not look nearly so promising as it does today.

Still, according to Robert Beckel, Mr. Mondale's national campaign manager, the delegate-committee device will continue to be used in the remaining primary and caucus states. He and Mr. Johnson say the money involved is peanuts. If so, why continue to use this unsavory-looking gimmick?

In the meantime, Mr. Hart has filed a complaint with the Federal Election Commission, which moves with all the speed of a somnambulant tortoise. Even in the event the FEC should eventually rule that the Mondale campaign violated the letter or spirit of the delegate-committee regulation, it will be too late to matter, and Mr. Mondale's advisers know it.

In 1980, the Ronald Reagan campaign exceeded the federal spending limit for the New Hampshire primary, which Mr. Reagan won, but by the time the FEC established the fact, it was dealing with President Reagan. Aside from the conduct of the Mondale campaign in the delegate-committee caper, the episode points up the need for the cop on the beat to make an arrest before the statute of limitations has run out on the suspect.

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National Institute For Labor Relations Research

ATTACHMENT A-2

THE WASHINGTON POST, TUESDAY, APRIL 24, 1984

Mondale Says PAC Aid to Delegates Ebbing

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 made a policy of not accepting PAC contributions and 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 those 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 grassroots 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.

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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 Fiore 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 5 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 Dan Balz contributed to this report.

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National Institute
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The Washington Post

Wednesday, April 25, 1984

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 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.

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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 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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ATTACHMENT A-6

THE WASHINGTON POST, WEDNESDAY, APRIL 25, 1984

Jackson Assails PAC Ties

By Tom Kenworthy
Washington Post Staff Writer

Jesse L. Jackson, campaigning yesterday in Maryland for the May 8 presidential primary, sharply criticized Democratic frontrunner Walter F. Mondale's acceptance of money from political action committees collected by local delegates. Jackson, joining criticism voiced earlier this week by Sen. Gary Hart (D-Colo.), said the campaign finance law is "either being stretched, extended or broken" by such PACs.

Jackson, in one of his strongest denunciations yet of the former vice president, said Hart was "essentially accurate" when he charged on Sunday that Mondale was financing his campaign in part through the "back door" by accepting "hundreds of thousand dollars" in PAC money collected by delegate committees.

Mondale said in Baltimore on Monday that he had instructed his local delegate committees to stop accepting PAC donations but defended fund-raising by such committees as perfectly legal.

Jackson, during campaign stops yesterday in Baltimore and Prince George's County, however, said the Minnesota Democrat's fund-raising efforts "come as close to rubbing or pushing the law as is traceable."

Jackson's criticisms of Mondale came in the midst of a general broadside against what he termed the "excessively heavy hand" organized labor is playing in the 1984 Democratic presidential contest.

"As opposed to using the democratic process," said Jackson, "labor has put all its eggs in Mondale's basket. In addition to diverting monies, it has provided him every kind of in-kind service. At what point does the use of free phones, trucks, cars and workers, at what point does that go over the border?.

"If it's not an illegality, it's certainly in bad taste," Jackson added.

Jackson's visit to Maryland yesterday took him from Dundalk in Baltimore County, where he spent Monday night with an unemployed steelworker and her husband, to a revival-style meeting with more than 100 black ministers in Baltimore, to Prince George's County, where he addressed rallies at the University of

While in Baltimore, whose heavily black electorate is critical to his chances of finishing second to Mondale in the state's primary, Jackson made the obligatory political tour of the revitalized Inner Harbor area. But the crown jewel of Mayor William Donald Schaefer's urban renaissance held little glitter for Jackson, he said.

Adopting the theme used by Billy Murphy, the black judge who unsuccessfully challenged Schaefer for mayor last year, Jackson spoke of the two Baltimores that exist side by side.

"There may be a new Baltimore for some," said Jackson to a crowd of about 100 onlookers, "but there is a Baltimore that hasn't changed." Referring to "people in their yachts" who visit the city's showplace, Jackson said "we don't want to sink the yachts at the top, but we do want to raise the boats at the bottom."

Murphy, who accompanied Jackson throughout the day, predicted that Jackson would exploit the theme more effectively than he had. "Jesse is saying it better than I said it. He's the first person since Martin Luther King Jr. to mobilize black people without threatening white people."

During the prayer breakfast with members of the Interdenominational Ministerial Alliance, Jackson seemed capable of galvanizing the politically influential ministers. The preachers gave Jackson a rousing welcome, as did members of the Ebenezer AME Church in Camp Springs, Jackson's final stop in Maryland.

His reception at the University of Maryland, however, may have been a disappointment for local organizers, who had hoped to fill the 15,000-seat Cole Field House to capacity for the $5-a-ticket rally. Only about 2,000 to 3,000 people attended.

At his only campaign appearance yesterday in the District—a $15-a-ticket evening fund-raiser at the home of City Council member H.R. Crawford (D-Ward 7)—Jackson made a virtue of his relatively small campaign war chest.

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"If Hart or Mondale had my [campaign] budget, they could not compete," Jackson told a cheering crowd of several hundred supporters who gathered under a blue-and-white tent in front of Crawford's southeast Washington home. "And if I had their budgets they could not compete."

Jackson was flanked by several of his top District supporters, including Mayor Marion Barry and City Council members Frank Smith Jr. (D-Ward 1) and Wilhelmina J. Rolark (D-Ward 8). Rolark is Jackson's campaign coordinator in the District.

Barry, who has campaigned extensively for Jackson in earlier primaries, described the candidate as "the conscience of the Democratic Party" and told the crowd that Jackson "does not take your vote for granted."

"For too long we've been left out of the [political] process," Barry told the largely black gathering. "Now we're part of it."

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National Institute
For
Labor Relations Research

The Washington Times
WEDNESDAY, APRIL 25, 1984

Democrat reformers PAC it in

The political "reform" itch, like most itches, gets worse when you scratch it. Take campaign financing. Resolved to put "fat cats" on a tight leash, the Democrats in 1974 pushed through a "reform" law that only a computer programmer could love. We're pleased to report they're having second thoughts.

No one, said the law, may give more than $1,000 to any one campaign (plus $1,000 for the primary, and $1,000 for a runoff). Anyone may give $20,000 to a party's national committee, but annual totals may not exceed $25,000. (Unlimited non-reportable sums may go to a party's "building fund," however.) There's also a formula limiting what candidates may spend. Got that? Next slide, please...

Names of contributors and amounts must be filed regularly with the Federal Election Commission, which spends about $10 million a year to keep track of all this and chide delinquents.

In 1976 Sen. James Buckley argued the law abridged free speech. The Supreme Court split the difference, ruling that limits on a candidate's total spending were a no-no, but limits on contributions were just fine. The candidate could spend as much as he wanted, providing he spent his own money. See how fair that is?

In 1983 the Communists complained that if they had to keep records and report to the FEC, the party's angels might be harassed or embarrassed. The federal courts agreed. Now no one can find out who gives how much to the CPUSA. Wait — it gets even better!...

The "reform" sparked the proliferation of PACs, political action committees, now deplored by reformers. House candidates, they say, cannot raise enough money locally, so they must now panhandle a passel of PACs which may not represent any district interest. PACs, by the way, may donate up to $15,000 to any candidate.

Messrs. Mondale and Hart supported these reforms. They also promised not to accept PAC money this year. But now Mr. Mondale, who blew most of his wad in the first few contests, has come up with a dandy loophole — setting up more than 100 state-level "delegate committees" which have so far raked in about $400,000 from PACs. Mr. Hart is furious and is taking his beef to the FEC. How's that for poetic justice?

It's time for Congress to undo the mischief it created. Let everyone give as much as he wants, and let the public know who is giving and how much. Then let the voters decide.

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ATTACHMENT A-9

THE NEW YORK TIMES, THURSDAY, APRIL 26, 1984

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 individual 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."

Insistence 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 ascendancy.

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. Mon-

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dale 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 Democrats: A Delegate Update

"Tuesday" represents results for 11 of the 13 delegates at stake in Vermont's caucuses. "Other" represents 35 delegates for Mayor Harold Washington of Chicago and 23 votes for George McGovern. Tallies in some states represent projections in incomplete caucus processes and are subject to change.

	Previous	Tues.	Total
Mondale	1,131	4	1,135
Hart	598	7	605
Jackson	188	0	188
Uncommt.	321	0	321
Other	58	0	58
TOTAL	2,274	11	2,285

TOTAL DELEGATE VOTES: 3,933

NEEDED TO NOMINATE: 1,967

Source: United Press International

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National Institute
For
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THE WASHINGTON POST
Thursday, April 26, 1984

The More Mondale Flails, the Deeper He Gets Into PAC Mess

Walter F. Mondale can't look good in his attempts to dig out of his worst embarrassment since his New Hampshire primary defeat. He looks either like a hypocrite or a hand-wringer in his attempt to stop the underground flow of political action committee (PAC) money into his campaign.

He may wish that he hadn't taunted his rival, Sen. Gary Hart (D-Colo.), in the Illinois primary for failing to scotch the famous television commercials mentioning Chicago alderman Edward R. Vrdolyak.

When Hart pleaded that he could not get them off the air, Mondale scoffed, "Here's a man who says he wants to be president of the United States . . . and he can't get an ad off TV that he pays for in 48 hours."

Mondale has moved to control the damage done to him by his delegate committees, which it turns out have been receiving hundreds of thousands of dollars in the PAC money he has forsworn.

He has told them to disband. He did not say why the 124 groups he previously insisted were "autonomous" will respond to the telegram containing this request when they blithely ignored two letters in which he appealed to them to follow his lead in spurning PAC money.

In early 1983, Mondale, like Hart, took the pledge on PAC contributions.

The "delegate committees" were supposed to be wholesome organizations that would encourage individual enterprise and neighborhood participation in the electoral process.

They got out of hand for two reasons. One was that Mondale spent to the edge of the federal limit in an effort to score an early knockout.

The other is the compulsive competence of his campaign, which apparently turned the committees into a highly effective welfare program for its national staff.

Reports to the Federal Election Commission show a pattern of laid-off headquarters personnel being transferred to the payrolls of local committees.

Flush primary states sent their overflow to the truly needy elsewhere.

It is possible that New Hampshire loyalists found out on their own the names and addresses of hard-up delegates in Florida.

The notion that Mondale might not have known about any of this is not seriously entertained.

He is an organization man who keeps his eye on every sparrow in his woodrously efficient campaign.

Mondale protests that none of this activity was improper, much less illegal. But

Mary McGrory

SLEAZE

the law is quite specific: "Expenditures made . . . 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 to be a contribution to such candidate."

Hart, who has filed a formal complaint with the FEC, is thundering at a red-faced Mondale to give the money back.

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Hart's campaign manager, Oliver (Pudge) Henkel, says that Mondale's cease-and-desist order is not enough.

"He has implicitly acknowledged the impropriety and likely illegality of the committees. But we want a full accounting of the funds raised and spent," Henkel said. "This is a deeply moral issue."

Mondale has been ambivalent about the conflicting demands of his budget and his promises ever since the PAC money surfaced in the New York primary last month.

"I want it known that I don't want any PAC money because I am dead serious about the issues," he said March 29. In the next breath, however, he said that the committees are "independent."

The "autonomous" argument was set back severely by the publication of a memo written by his delegate coordinator, Elaine Kamarck.

On Jan. 12 she told delegates that while that while Mondale does not take PAC money, they should make their own decisions. She also urged them to call Mondale headquarters if they had legal questions.

Mondale's campaign manager, Bob Beckel, echoed the futility argument.

"We have no right to go to the labor unions and tell them not to spend their money," he said.

But Mondale, when he began to feel the heat, changed his mind. Monday night, according to one of his staff, he telephoned AFL-CIO President Lane Kirkland to tell him he wanted the PAC money turned off.

Whether Hart can use the issue, with all it says about Mondale's candor and dependence on labor, is a question. His Texas campaign manager, Rep. Martin Frost (D-Tex.), says that he doesn't think it cuts much down there.

But the Reagan campaign committee, which is all but inundated in campaign checks, is certain that the president could exploit it in encounters with Mondale.

"He says he doesn't want the money coming in," said Reagan campaign secretary James Lake, "but he says he can't stop it. Is that leadership?"

Democrats are reaching a glum consensus: "If Mondale is the nominee, the sleaze factor against Reagan is gone."

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Richmond Times-Dispatch

Friday, April 27, 1984

Mondale PACs It In

Walter Mondale is for goodness and decency in government. At least that's what we're to understand from his campaign sermons. The son of a preacher and former sidekick to Jimmy "Trust Me" Carter, he professes himself shocked by the "sleaze" of the Reagan administration and says he intends to make a campaign issue of it.

Trouble is, practicing what Mr. Mondale preaches is too big a strain for most people, apparently even for Saint Walter himself. For example, the former vice president preached long and loudly, to anyone still listening, on the evils of political action committee money, which he said distorts the democratic process. At the end of the sermon, however, the labor PACs held out their money, and Mr. Mondale's ushers passed the collection plate.

What Mr. Mondale did was to set up a union-financed committee organization that helped him evade tough election contribution laws. PACs are prohibited from giving a candidate's central committee more than $5,000; Mr. Mondale said he wouldn't accept that money on ethical grounds anyway. That restriction, however, did not prevent the formation — at the behest of his campaign headquarters — of supposedly independent Mondale "delegate committees" that could receive funds as well.

Now that the Democratic nomination seems once again in hand, Mr. Mondale is renouncing the committees — though not, apparently, the more than $315,000 that union PACs poured into them — and urging them to disband. Until now, however, he fretted about the contributions all the way to the bank.

Federal Election Commission reports indicate that 100 of these committees had been set up at the state level since January. By spreading funds among many committees, PACs' total contributions could exceed the $5,000 limit.

Among the examples cited in a recent Wall Street Journal story were $54,000 from the American Federation of Teachers to 38 of the delegate committees, $33,500 from the United Auto Workers, $43,000 from the American Federation of State, County and Municipal Employees, and $23,500 from the Communications Workers of America.

Mondale supporters claimed the delegate committees were grass-roots organizations outside the control of his central committee, which would make the contributions legal. Commission records would seem to indicate otherwise. Was it really just coincidence that the auto workers — a union with close ties to the Mondale campaign organization — sent six identical checks to six of his delegate committees in Illinois on the same day? Was it coincidence that 30 people dropped from the Mondale central committee suddenly appeared on the payrolls of the grass-roots committees? Gary Hart doesn't believe so and filed an official protest.

More than 85 percent of the money received by these committees was donated by labor PACs, and little of that came from local unions. Clearly, the arrangement enabled Mr. Mondale to pick a peck of PAC money. Ironically, the man who warned of PACs' corrupting influence fell prey to it.

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National Institute
For
Labor Relations Research

The Washington Post

Saturday, April 28, 1984

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, were 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 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 preconvention 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.

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"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 pleas 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 $850 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.

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National Institute
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Richmond Times-Dispatch

Saturday, April 28, 1984

Patrick J. Buchanan

How PAC-Man Pulled It Off

WASHINGTON — Well, well, well. Seems as though that priggish person who had the kids expelled from the congregation for smooching in the alcove has just been netted in a midnight raid on Plato's Retreat.

The Chablis-and-brie crowd has been regaled for weeks with Fritz Mondale's cutting commentary on the moral laxity of President Reagan's government: "Every week, another rotten apple seems to fall out of that tree."

This past week, red-faced Fritz himself came tumbling out from among the branches.

It appears that the great comeback of Fighting Fritz was bought with special-interest bucks Mondale assured us he would never accept, that Candidate Mondale raked in the pot in a high-stakes poker showdown with Gary Hart — only after dealing himself a couple of extra cards off the bottom of the deck.

As of today, Mondale is headed for San Francisco to pick up a nomination that might have been Gary Hart's, if the Mondale campaign had not extravagantly cheated on the rules by which they had agreed to play.

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HEREWITH THE CHRONOLOGY:

In January, with the rest of the good liberals in competition, Mondale took the Common Cause pledge not to accept special-interest money from the political action committees, or PACs.

By early March, however, having lost in New Hampshire, Maine and Vermont, Fritz Mondale saw his career on a life-support system, his campaign bumping up against the legal spending limits. Suddenly, "delegate committees" began blooming in the crucial primary states. Dozens, then scores. These are "autoonomous" and "independent," our champion declared. Just to be sure they, too, abided by the Mondale proscription against PAC money, Mondale dispatched several publicized epistles insisting they adhere to the same rules.

'Documentary evidence points to a cynical and systematic effort of Mondale's agents to collude to evade the letter and trample all over the spirit of a federal law Mondale customarily venerates as an icon of "post-Watergate" reform.'

While Fritz was wagging his finger, however, chief delegate coordinator Elaine Marmac was sending along an instruction kit specifying exactly how the delegate committees could go tap into the PAC millions.

Tap they did. According to a Washington Post review of Federal Election Commission records, the delegate committees took to the PAC money like television pooches to the Alpo. Cash was smoothly transferred from delegate committees in states where primaries had just been held — into states where primaries were imminent. Staffers dropped by a Mondale campaign running low on money turned up on the payroll of delegate committees flush with fresh cash. The operation seems to have had all the randomness of the Inchon invasion. Documentary evidence points to a cynical and systematic effort of Mondale's agents to collude to evade the letter and trample all over the spirit of a federal law Mondale customarily venerates as an icon of "post-Watergate" reform.

Alternative conclusions suggest themselves: Either Mondale is an administrative incompetent incapable of managing a parking lot; or Mondale is a phony, an 18-carat hypocrite who secretly indulges a political vice he piously and publicly deplores.

Caught *in flagrante*, Mondale phoned Lane Kirkland of the AFL-CIO, the great philanthropist himself, and begged him to stop funneling back-door bucks into Mondale's own delegate committees. When that gesture did not still the uproar, Mondale declared Wednesday he would disband the committees altogether. Fritz would like to change the subject to space weapons.

To Gary Hart's demand that Mondale return the money that ensured his comfortable margins in New York and Pennsylvania, the former vice president responded: "This money is used at the local level for delegate selection. ... It's not for me." Yes teacher, that's right, the dog ate my homework.

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WHILE THE REVELATIONS scream for appointment of a special prosecutor when Dutch returns from the Great Wall, the real issue here is sanctimony, the fraudulent piety of Parson Mondale.

Let Ed Meese keep some cuff links the South Koreans gave him, let Jim Watt make a verbal gaffe on affirmative action, let Dick Allen accept a cheap watch from Japanese friends before taking up duties at the National Security Council, and Fritz Mondale will scream "sleaze" and chair the Council of Purification that drives them forever from the Temple of Government.

Well, now, the mob is milling around Parson Mondale.

"This is a deeply moral issue," solemnly intones Hart's campaign manager. Again, we are reminded of the poet's observation that "morality is the argument we use against those we most dislike." See ya at the hanging.

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National Institute
for
Campaign Research

ATTACHMENT A-17

THE NEW YORK TIMES SUNDAY, APRIL 29, 1984

Mr. Mondale UnPACs

Even as Walter Mondale abolished the 127 supposedly independent committees formed to support his convention delegates, the candidate protested that the entire operation had been legal, proper and beyond his control. The action, though belated and taken only after pressure from rival Gary Hart, was welcome. The evasiveness was not.

The delegate committees have been conduits for political action committee money, chiefly from organized labor. They may indeed be wholly legal, though the Federal Election Commission has yet to say so. But was the operation proper? Certainly not when measured against Mr. Mondale's righteous rejection of campaign contributions from special-interest PAC's.

And beyond his control? Election Commission files show a pattern of direction from the central Mondale campaign, including the shift of funds and personnel between committees and headquarters and coordination to defray the national campaign's expenses in key states. Much to his credit, Mr. Mondale saw Mr. Hart's point and decided to give back the questionable money.

Such forthrightness did not mark the start of this enterprise. Mondale headquarters reminded delegate committee chairmen in January that the candidate was not accepting PAC money, but also advised each committee that it was free to make its own decision about which contributions to accept.

When the Hart forces began to challenge the arrangement, Mr. Mondale reaffirmed his personal opposition but said he couldn't control those committees. That remained his posture until the evidence of coordination began to pour in from commission filings. Score one for the disclosure provisions of the Federal election law.

To be realistic, the committee arrangement was a desperation move. Mr. Hart's stunning victory in New Hampshire left the Mondale campaign reeling and its financial plan in shreds. Having "front-loaded" so much of its spending, how could it now meet the suddenly urgent demands of the next primaries?

The need for survival explains but does not excuse, as Mr. Mondale now seems to recognize. Mr. Hart may grumble that his opponent is giving the money back only when he no longer needs it, but there's no denying the wisdom of the move. It's just about all anyone could ask of a candidate who made a serious mistake.

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State of Pennsylvania)

City of Philadelphia) May 14, 1984

A F F I D A V I T

KNOW ALL MEN BY THESE PRESENTS:

That I, Albert J. Brown, residing at 1012 W. Clearfield Street, Philadelphia, Pennsylvania, 19132, Telephone: (215) 223-3796, a private investigator for eight (8) years, being duly sworn, depose that:

1. On April 9, 10 and 11, 1984, in connection with an investigation of possible violations by organized labor of Federal Election Committee(FEC) Regulations related to the U.S. Presidential primary campaign. I went to an office at 1420 Walnut Street where, in back of the office was a large "Mondale At-Large Delegate Committee" sign. I had, in part, gone to that office because State Senator Joe Rock, who had been at a political rally on April 7 on behalf of Senator Mondale at the International Union of Electronics, Electrical, Technical salaried and Machine Workers, AFL-CIO at 6300 Old York Road in Philadelphia, had directed me to that office in response to my question of how I could help Senator Mondale's Campaign.

2. I volunteered to work for the Mondale campaign and during the times that I was in the office and from conversations with some of the office personnel with whom I conversed, some of these being on the street, I identified the following people whom I believe to be staffers or organizers for the Mondale campaign and whom I do not believe were unpaid volunteers.

a. Kathy Russell, a young woman who seemed to be a supervisor and especially to be in charge of distribution of Mondale campaign literature. She seemed to receive a number of official calls by

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name. She also seemed to be in charge of closing down the office the day after the election on April 11, 1984. She wore a gold pin in the shape of the map of Pennsylvania and with the name "Mondale" imprinted in black thereon, which I understood to be the type of pin worn only by Mondale staff personnel as opposed to unpaid volunteers. From the circumstances, incidents and conversations, I got the impression that she coordinated activities between the Mondale At-Large Delegate Committee office at 1420 Walnut Street and the Mondale Philadelphia traveling headquarters offices in the adjacent Bellevue Stratford Hotel; in the "Imperial Suite" and other adjacent rooms on the fourteenth floor. I determined the location of the Mondale traveling headquarters by actually visiting the suite area on April 9, while in the Delegate's office, Jennifer Collins (identified in "b" Below) answered my question as to Russell's whereabouts, that Russell had "taken papers up to the suite area."

b. Jennifer Collins, who was also called "Little Ginny". She seemed to be an assistant to Kathy Russell and also wore a Mondale staffer pin. Ginny commented that they were "going back to Washington" after they closed down the Philadelphia campaign office.

c. "Al, also called "Boss Al", a black male about 5'11" and weighing about 205 pounds seemed to be somewhat in charge of distribution of material, especially when Kathy Russell was not in the office. He seemed to receive calls for him by name and was very knowledgeable

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of the activities going on, but from circumstances and conversations I believe he resided locally and was not part of the traveling staff.

WITNESS THE FOLLOWING signature:

Albert J. Brown

State of Pennsylvania)

County of Philadelphia)

I, [illegible], a Notary Public in and for the County aforesaid, in the State of Pennsylvania, do hereby certify that Albert Brown, whose name is signed to the above writing, bearing the date of the 14 day of May, 1984, has personnaly appeared before me in my County aforesaid and sworn and acknowledged the same.

Given under my hand this 14 day of May, 1984.

Notary Public

My commission expires on the 26 day of October, 1987.

8504261

State of Pennsylvania)
City of Philadelphia)

AFFIDAVIT

KNOW ALL MEN BY THESE PRESENTS:

N.C AKA: JOSEFINA RIVERA N.C

THAT I, Nicole Chambers, residing at 2130 Wallace Street, Philadelphia, Pennsylvania, Telephone: (215) 329-2726, being duly sworn, depose that:

1. On April 9, 1984, I went to the Mondale At-Large Delegate Committee office at 1420 Walnut Street, Philadelphia, and volunteered to work on behalf of the Mondale campaign. I first went to the office shortly after 3:00 p.m. and stayed for about 1/2 hour and at the request of the staff people, returned at about 4:30 p.m. and stayed and worked until about 6:00 p.m.

2. While working in the office, I identified some people whom I believed to be Mondale staff workers as opposed to being unpaid volunteers. One of the ways that I identified them as being staff people was that they wore a gold pin in the shape of a map of Pennsylvania with the Name "Mondale" printed in black thereon. Also, I believe them to be paid staff people because they seemed to be in a good mood, and all, at one time or another, mentioned the "Mondale paychecks" they had just gotten. From the conversation I overheard, the three female staffers (identified in a, b and c below) all were staying at

N.C.

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the Bellevue Stratford Hotel. Their conversation also centered around their being invited to go to work for the Mondale campaign in connection with the California Mondale Presidential primary campaign, since the members of their group were considered Mondale's "best staffers" and it seemed they all planned to go to California. Those identified were as follows:

a. Wanda, whose last name I do not know, is a black girl, about 5'6" tall, weighing 120-130 pounds, and with short black hair. She seemed to be in charge of distribution of Mondale campaign material during the time I was in the office. She said that she had had a full time job in New York, but had left that job to come to Philadelphia to work on behalf of Mondale.

b. Ann Lewis, to whom I was introduced by Wanda by name, is a white woman about 38 years old, about 5'7" tall, 135-140 pounds, had blond hair and wore glasses. She was apparently responsible for paying the staff people in some way, since the five or six people who came into the office asking for their pay checks (but whom I cannot identify further) were directed to Ann Lewis, who gave them checks.

c. Doris Lassons, to whom I was introduced by Wanda by name, is a black woman in her early 40's, about 5'5" tall and heavy set, weighing probably about 160 pounds. I do not know what her specific job was, but I recall her making

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N.C

a comment to the effect that she had trouble "getting the last two delegates".

d. "Bill", whose last name I do not know, is a white man, about age 50, about 5'5" tall, rather heavy set, weighing approximately 170 pounds and having salt and pepper hair and a moustache. He seemed to be assisting Wanda in the distribution of campaign material. I got the impression that he was a local Philadelphia area resident. He did not wear a Pennsylvania "Mondale" pin like the three females described above and he talked about having worked for Philadelphia Mayor Goode's election campaign. He indicated that he was paid because he made a comment to the effect that he was doing it for the money or that the money was good.

WITNESS THE FOLLOWING Signature: Nicole Chambers
Josefina Rivera

Nicole Chambers AKA: Josefina Rivera

State of Pennsylvania)
County of Phila)

I, Robert J. Wescott, a Notary Public in and for the County aforesaid, in the State of Pennsylvania, do hereby certify that Nicole Chambers, whose name is signed to the foregoing affidavit, personally appeared before me in my County aforesaid and swore and acknowledged the same this 17 day of May, 1984.

ROBERT J. WESCOTT, JR.
Notary Public, Phila., Phila. Co.
My Commission Expires Feb. 23, 1987

Robert J. Wescott
Notary Public

My Commission expires on the _____ day of _____, 19___.

8504042567

State of Pennsylvania)
City of Philadelphia)

A F F I D A V I T

KNOW ALL MEN BY THESE PRESENTS:

That I, Albert J. Brown, residing at 1012 W. Clearfield Street, Philadelphia, Pennsylvania, 19132, Telephone (215) 223-3796, a private investigator for eight (8) years, being duly sworn depose that:

1. On April 10, 1984, in connection with an investigation of possible violations by organized labor of Federal Election Commission (FEC) Regulations related to the U.S. Presidential primary campaign, I went to the Mondale At-Large Delegate Committee office at 1420 Walnut Street in Philadelphia.

2. While in the bathroom of the office, I observed in a box on the floor, and procured, Mondale campaign material, much of which seemed to be from other areas of the country and copies of which are attached as exhibits hereto and described as follows:

Exhibit 1: A flyer printed on two sides addressed "Dear Fellow Oklahoma Democrats", and on the back headed "PRESIDENTIAL CANDIDATE QUIZ". The bottom back of the flyer bears the annotations "Paid for by Mondale for President, Inc." I placed my initials "A.J.B." and the date "4-10-84" on the back of this flyer.

Exhibit 2: A sample ballot entitled "OFFICIAL MONDALE DELEGATE'S BALLOT" and solicits the election of Pennsylvania Second Congressional District Mondale delegates. There is a statement at

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the bottom of this ballot: "Paid for by Second Congressional Delegates for Mondale, Anthony McNeil, Treasurer." I place my initials "A.J.B." and the date 4-10-84 on the back of this "ballot".

Exhibit 3: A poster, 11"x17" entitled: "Reaganism: A Price Too High". The bottom of this poster is annotated: AFL-CIO COPE Washington, D.C. 20006" and "Reprinted from the AFL-CIO news." I placed my initials "A.J.B." and the date 4-10-84 on the front of this poster.

Exhibit 4: A flyer entitled "MONDALE'S COMMITMENT TO BLACK AMERICANS" and marked "Paid for by Mondale for President". This flyer bears an imprint of the map of Illinois and solicits support for Mondale delegates with the last names of Daggett; Jennings; Harris; Taylor; Saries, Gonzales; Bush; Quinn; and Penn. I placed my initials "A.J.B." and the date 4-10-84 on the back of this flyer.

Exhibit 5: A flyer entitled: "Walter Mondale - THE EXPERIENCE TO KNOW WHAT NEEDS TO CHANGE...", the back of which is entitled "THE ECONOMY - KEY TO OUR FUTURE". It is noted that the flyer is issued by Mondale for President, Washington, D.C. and that it is "Paid for by Mondale for President, Inc." I placed my initials "A.J.B." and the date "4/10/84" on this flyer.

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Exhibit 6: A sample ballot entitled Walter Mondale - The Experience to Know What We Need to Change..." and noted to be issued by "Illinois for Mondale" and marked "Paid for by Mondale for President, Inc." I placed my initials "A.J.B." and the date 4/10/84 on the sample ballot.

Exhibit 7: A press release issued by Mondale Illinois State Campaign on Wednesday, January 4, 1984 entitled "MONDALE CAMPAIGN ANNOUNCES ILLINOIS DELEGATE SLATES.

WITNESS THE FOLLOWING signature:

Albert J. Brown

State of Pennsylvania)
County of Philadelphia

I, Janice V. Roberts, a Notary Public in and for the County aforesaid, in the State of Pennsylvania, do hereby certify that Albert J. Brown, whose name is signed to the foregoing affidavit, personally appeared before me in my County aforesaid and swore and acknowledged the same this 14 day of May 1984.

Janice V. Roberts
Notary Public

My Commission expires the 26 day of 10, 1987.

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EXHIBIT 1

Dear Fellow Oklahoma Democrat,

Today there's a new argument in the land, a new idea about the Democratic Party and where it should go. This I believe is the essence of the battle we're in. If you fight for values the Party has always believed in, you're supposed to go on a guilt trip, but if you fight against them, you're supposed to be applauded.

If you fight for better schools, you're old, but if you fight for sub-minimum wage for teenagers, you're new. If you fight for civil rights, it's a special interest, but if you buckle under to the Hospital Lobby, it's a new idea.

If you defend Medicare, you're cautious, but if you attack entitlements, you're courageous. If senior citizens want Social Security, that's the past, but if A.T.& T. wants to tack a big bill on your phone for the privilege of using long distance lines, that's the future.

If a worker wants a raise, that's greed, but if a plant closes down that's trendy.

If you want big corporations to pay their share of taxes, you're old hat, but if you want working families to pay more taxes, you're high tech.

I DON'T ACCEPT IT !

Help me to keep this fight for the soul of the Democratic Party alive.

Let's keep this debate over the future alive.

I entered this race because of principle not ambition, and I will stay in this race until the end because of principle

Sincerely,

Walter F. Mondale

MONDALE

FOR PRESIDENT

B50405427

PRESIDENTIAL CANDIDATE QUIZ

Before you choose a democratic candidate for president please take the following quiz.

Section 1. Choose 1 Presidential Candidate for each question

a. Which Democratic candidate was the first to support a nuclear freeze?

b. Which candidate was Attorney General, Senator, and Vice President?

c. Which candidate has led the fight for Social Security (hint: he wrote the Medicare bill), Civil rights, environment and equal rights for women. (He wrote the women's education equity act, created a comprehensive day care system vetoed by Nixon and helped create Headstart.)

★ The answer to the questions in Section 1 is Walter Mondale.

Section 2. Answer the following True or False questions.

a. Gary Hart first refused to endorse the nuclear freeze and then he waited a year before co-sponsoring it in the Senate. True or False.

b. Five weeks after Gary Hart co-sponsored the nuclear freeze he co-sponsored Ronald Reagan's approach to arms control called build down (build down was Reagan's attempt to kill the freeze and to continue production of new and more powerful nuclear weapons). True or False.

c. Gary Hart voted against returning money to the trade adjustment assistance fund after Ronald Reagan gutted the program in Fiscal Year 1982. (This fund provided money to retrain and relocate workers who lost their jobs due to foreign imports.) True or False.

★ The answer to all the above questions is True. Please continue to Section 3.

Section 3. Please answer the following multiple choice questions.

a. The sub-minimum wage for teenagers
1. would put older workers out of jobs
2. is supported by Ronald Reagan
3. is supported by Gary Hart
4. is opposed by Walter Mondale
5. all of the above

b. The Chrysler loan program
1. saved hundreds of thousands of jobs
2. was opposed by Gary Hart
3. was supported by Walter Mondale
4. all of the above

★ The answer to the questions in Section 3 is all of the above.

Secton 4. Extra Credit

a. Who do you want to negotiate the arms control agreement with the Soviets?

This is just a quiz. The real test is this Tuesday at your Democratic Precinct Meeting. Don't base your answers on trendiness. Choose a candidate who has the record, the ideas and the experience - Walter Mondale. For answers to other questions on the candidate or for information on your Precinct Meeting please call:

OKC 239-2246
Tulsa 584-0904

Paid for by Mondale for President, Inc.

EXHIBIT 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. **HALPIN**

174 Doris A. **SMITH**

179 Herman **WOODEN**

184 Ann J. **LAND**

185 Arnold C. **STORR**

ALTERNATE DELEGATE

195 Dennis C. **WHITE**

197 Jeffrey D. **MORAN**

199 Leslie B. **KERNODLE**

Paid for by Second Congressional Delegates for Mondale
Anthony McNeil, Treasurer

P.J.B.
4-10-84

EXHIBIT 3

Reaganism: A Price Too High

THE STATISTICS OF PAIN

The statistics on this page sum up—but by no means tell the whole story of—the cost in pain of the Reagan Recession and the Reagan cuts in important people-helping programs. It is a cost not nearly offset by the present period of partial recovery—a recovery which many economists fear might collapse in early 1985 under the weight of record-high Reagan deficits.

Millions of working and needy Americans have paid and are still paying a staggering price for Reaganism: in jobs lost, in health care withheld, in nutrition denied, in higher education forestalled or abandoned, in job training aborted, in homes foreclosed.

Their story—by the numbers—follows. (Figures from AFL-CIO Dept. of Economic Research, Congressional Budget Office, Children's Defense Fund, U.S. agencies.)

Workers... Victimized

Number of individual workers suffering one or more episodes of unemployment 1981 through 1983: 30 million (minimum figure).

Number of individual workers suffering joblessness by year: 1981, 23 million; 1982, 27 million; 1983, 27 million.

Average mean duration of unemployment, 1981-83 respectively: 14 weeks, 16 weeks, 20 weeks.

Average gross weekly earnings lost per year by job-loss workers: 1981, $3,315; 1982, $4,005; 1983, $5,620.

Over-all gross weekly earnings of workers lost per year through unemployment: 1981 loss $76.2 billion; 1982 loss $108.1 billion; 1983 loss $151.7 billion.

- Total gross weekly earnings lost through unemployment 1981 through 1983: $336.1 billion.
- Value of lost production 1981-83 respectively (as result of unemployment above 1979 level): $180 billion, $390 billion, $380 billion.
- Total value lost production 1981-83: $950 billion.
- Loss to U.S. Treasury through unemployment, 1981-1983 (over 1979) respectively: $54 billion, $117 billion, $114 billion.
- Total loss to Treasury through unemployment 1981-83: $285 billion (enough to substantially reduce record Reagan deficits).
- Number of persons losing some or all health coverage as result of unemployment: 10.7 million.
- Mortgage foreclosures during Reagan Recession (actual or in foreclosure process): 116,000 in 1981; 160,000 in 1982; 178,000 in 1983 (highest levels since tracking of statistic started in 1953).
- Business failures during Reagan Recession: 16,794 in 1981; 25,364 in 1982; 30,794 in 1983 (highest since 31,822 in 1931 and four times 1970 rate of 7,564). Total business failures 1981-83: 72,934.
- Rate of business failure: In 1979, 28 per 10,000; in 1982, 89 per 10,000.

The Needy... Needier

- Needy persons losing *all* food stamp aid: 1 million.
- Number of working poor, others, losing *some* food stamp aid: 4 million.
- Increase in number Americans living in poverty: 6 million (1981-82 alone). Rate of poverty now highest in 17 years—15% of all Americans.
- Cuts in Aid to Families with Dependent Children program (AFDC): $4.8 billion (13 %); 725,000 families affected, 1.5 million children.
- Children of needy families losing Medicaid protection: 700,000 (1982 alone).
- Children of needy families losing services at community health centers: 290,000.
- Cuts in child nutrition programs: 28 %.
- Number of children from low-income homes losing free or reduced-price school lunches: 1.1 million.
- Number of children from low-income homes losing free or reduced-price school breakfasts: 900,000.
- Cutback in higher education loan program: 27%.
- Number of young persons affected by cutbacks in low-interest loans for higher education: 700,000-plus.
- Cuts in other student financial aid programs: 13%.
- Medicaid/Medicare cuts: 5%.
- Other health program cuts: 22%.
- Cuts in job-training for disadvantaged: 35% ($7.4 billion).
- Funds cut from retirement programs over-all—social security, civil service pensions, veterans' benefits: $26 billion.
- Funds cut from income security programs over-all—food stamps, unemployment insurance, housing aid, AFDC: $27 billion.
- Funds cut from health programs over-all: $18.5 billion.
- Funds cut from education and social service programs over-all: $13.7 billion.
- Funds cut from employment and training programs over-all: $25 billion.
- **Total funds cut from people-helping programs under Reagan (1981-84): $110.2 billion.**

NOTE: The $110.2 billion cuts in people-helping programs represents only that portion of Reagan-proposed slashes that Congress agreed to. They were not really deep enough for his taste. Had all Reagan cuts been adopted as proposed, the $110.2 billion figure would balloon to the $140-$150 billion range over the same time period.

Turn It Around—Register/Vote

AFL-CIO COPE • Washington, D.C. 20006

Reprinted from the AFL-CIO News

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Vote for MONDALE for President

Mondale's Commitment to Black Americans

NOW

- The Mondale Campaign is utilizing the services of Black Business.
- Campaign travel is being audited by 7 Winds and 4 Seas Travel Company, a black travel agency located in Baltimore.
- Campaign funds are deposited in a black owned bank, the United National Bank of Washington, D.C.
- A large percentage of mass paper and printing services are handled by Melrose Kline, a black owned printing company.
- In addition, the campaign is being audited by a black accounting firm in Washington, D.C.
- As the campaign grows, it will be looking for additional opportunities to do business with minority firms.



On March 20th Vote for

MONDALE

AND THE MONDALE DELEGATES

- ILLINOIS C. DAGGETT (MONDALE) 867
- JACOB JENNINGS, JR. (MONDALE) 868
- JOAN W. HARRIS (MONDALE) 869
- WILLIAM H. TAYLOR II (MONDALE) 870
- M. ELIZABETH BARRIS (MONDALE) 871
- ALPHONSE C. GONZALES (MONDALE) 872
- TYWANDER BUSH (MONDALE) 873

MONDALE ALTERNATES

- JEANNE P. QUINN (MONDALE) 896
- MICHAEL PENN (MONDALE) 897

MONDALE

THE REAL THING IS BETTER THAN A "NEW" IDEA

EXHIBIT 4

88-1-88

EXHIBIT 5



An Outstanding Record of Service And a Vision for the Future

Walter Mondale

Walter Mondale grew up with the family values of small-town rural America. His father was a minister, and his mother taught music; together, they taught Walter Mondale to speak the truth, to respect hard work, to cherish their faith, to respect our country and its laws, and to help others.

Walter Mondale went on to earn a degree from the University of Minnesota and after serving in the United States Army he earned a law degree on the G.I. Bill.

With Hubert Humphrey he worked hard to build the Democratic Farmer-Labor Party of Minnesota, and in 1960 he became the youngest state Attorney General in Minnesota history. He fought for consumers and was an early and effective leader in the struggle for civil rights and civil liberties.

In 1964 he became a United States Senator. In the Senate he fought for civil rights, voting rights, and for an end to discrimination in housing. He worked to improve education for all children, and to strengthen families with nutrition programs and day care centers. He fought for senior citizens and was one of the original sponsors of Medicare. As a member of the influential Finance Committee he fought for fairness and equity in our tax laws. He fought for passage of the Equal Rights Amendment, and wrote the nation's first comprehensive child care act (vetoed by Nixon) and designed the Women's Educational Equity Act. He was a co-sponsor of the Clean Air Act of 1970 and the Water Pollution Act of 1972. He opposed the Nixon plan to junk the ABM Treaty and put multiple warheads on nuclear missiles. And in 1976 he was a key author of the first Senate resolution to stop the proliferation of nuclear weapons.

In 1976 he was elected Vice President of the United States and became the most active and influential Vice President in history.

"I know how to shape a government. I know how to lead. I know how to defend this country – and I know how to search for peace.

"Americans want to be one strong nation. We're confident. We're ready. And so am I." - Walter Mondale

Mondale for President
2200 Wisconsin Avenue, N.W.
Washington, D.C. 20007
Telephone 202-625-1000

Walter Mondale



The experience to know what needs to change.

The strength to make it happen.

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The Economy—Key to Our Future

"The key to this nation's future is a healthy growing economy—an economy that provides jobs and opportunities for all Americans, and not just profits for the rich. We have to get people back to work. Without jobs, there is no tomorrow"—Walter Mondale

Here's how he'll do it:

• Cut Reagan's record red-ink deficits—and cut them fast—by:

Stopping the Pentagon's waste and foolish spending. We can't afford to pay $100 for a 4-cent part; we can't afford to buy billion-dollar weapons that don't work.

Putting limits on how much the doctors and the hospitals can gouge Medicare and Medicaid and the public. Nobody should have to pay $700 a day for a hospital room or $85 to walk into a doctor's office.



Making the rich pay their fair share of taxes like everybody else.

• Tell the Federal Reserve that we want monetary policies that make sense—that help people buy houses and cars and home appliances.

• Put people—millions of men and women—back to work like FDR did, and retrain workers who were abandoned when their jobs were sent to Taiwan or Singapore.

• Make pay equity a reality.

• Tell government and business and labor, we have to work together to rebuild the nation's basic industries. We have to work together and stand together; there's no other way.



• Rebuild our nation's roads and bridges and dams and waterlines. These make up our nation's physical foundation, as they have to be sound.

• Enforce the civil rights laws so that women and minorities have a fair chance to get and keep a good job.

• Give smaller, creative companies an even break instead of passing out all the goodies to the big corporations. Big business doesn't need public assistance.



• See to it that American exporters don't get short-changed by other countries' unfair trading practices.

• Give family farmers a fighting chance against the giants of agribusiness.

• Bring the nation's governors and mayors together to forge a real partnership with the federal government to make this nation's cities good places to live.

War—or Peace?

"In this, the nuclear age of doomsday weapons, we have to do everything in our power to ensure peace. The most awesome responsibility of the President is not only to keep us strong so that we don't invite attack, but to use all of our physical and moral strength to keep the peace and spare the world from holocaust."
—Walter Mondale

What about global brinksmanship saber-rattling? What about our increasing military involvement in Central America? Here's what Mondale will do:

• Strengthen our regular military forces.

• Get back to dealing with smaller nations as a friend instead of as a bully.

• Restore our nation's open commitment to human rights as the cornerstone of American foreign policy.



• Help poorer nations stand on their own feet. Democracy will never grow in the soil of poverty, oppression, and despair.

• Attract the people of Central America with our values—instead of scaring them with our weapons.

And what about nuclear weapons? Here's what Mondale will do:

• Sit down with the Russians and work out a mutual and verifiable freeze on nuclear weapons.

• Send the Salt II treaty to the Senate and support its ratification.

• Bury the MX missile boondoggle once and for all.

• Stop wasting money on nerve gasses and other indiscriminate killers.

• Put this nation out front again in the effort to halt the spread of nuclear weapons—and the threat of doomsday blackmail.

Education—the Future of Our Children—the Future of Our Nation.

"Getting this nation's schools back on the track will be one of the top priorities of the Mondale Administration. Everything depends on strong schools and strong colleges: a healthy economy, a strong defense, social justice, opportunity for all. There is no reason whatsoever why the next generation of Americans cannot be the best educated and trained in this nation's history."
—Walter Mondale



Here's how Mondale will go about it:

• Establish a Fund for Excellence to help local schools do a better job of teaching children.

• Start an "Education Corps" to attract bright and dedicated young people to teaching careers, and help the teachers already in the classroom to sharpen their skills.

• Give the nation's laboratories, libraries, and research centers the support they must have.

• Start a crash effort to give our kids better training in math, science, and languages. That's where tomorrow's jobs will be.

• Strengthen programs for rural and inner-city schools to give poor children an even break.



• Make sure that every American family, and not just the wealthy few, can afford to send their kids to college.

• Create awards to help gifted graduate students complete their training.

• Stop the loss of talent that occurs because of discrimination and sex stereotyping in schools.

8 5 0 4 0 5 0 4 2 7 7



Mondale for America

I know how to shape a govern-
ment. I know how to defend this
country—and I know how to
search for peace.

Americans want to be one strong
nation. We're confident. We're
ready.

And so am I."

ON MARCH 20th VOTE FOR

WALTER F. MONDALE

FOR PRESIDENT

AND ALL MONDALE COMMITTED DELEGATES AND ALTERNATES

(SAMPLE)

DELEGATES

☐ DELEGATE'S NAME (MONDALE)

ALTERNATES

☐ ALTERNATE'S NAME (MONDALE)

MONDALE

G. J. B. Kinney

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

Pd. for by Mondale for President, Inc.

WALTER MONDALE



EXHIBIT 6

THE EXPERIENCE TO KNOW WHAT WE NEED TO CHANGE... THE STRENGTH TO MAKE IT HAPPEN

"America must be number one again 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 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.



EXHIBIT 7

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

MONDALE

ILLINOIS STATE CAMPAIGN: 30 W. Washington, Rm. 530, Chicago, 60602
(312)368-1984

CONTACT: Jim Margolis
(312)368-1984

FOR IMMEDIATE RELEASE: Wednesday, January 4, 1984

MONDALE CAMPAIGN ANNOUNCES
ILLINOIS DELEGATE SLATES

****

CHICAGO--Citing the "diversity and depth" of the delegate candidates committed to former Vice-President Walter F. Mondale, U.S. Congressman Daniel Rostenkowski (D-IL 8th) announced today the Mondale campaign's 1984 delegate slates for Illinois.

The House Ways and Means Committee chairman noted that the slates which have been developed by the campaign demonstrate the broadbased support Walter Mondale enjoys throughout the state's 22 congressional districts.

"The people you find here representing Fritz Mondale as delegate candidates are very simply the people of Illinois," said Rostenkowski. "They are young and old, black, white, and Hispanic. They are regular Democrats and independent Democrats, elected officials and women activists," continued Rostenkowski. "They are teachers, blue collar workers, professionals and farmers. Indeed, they represent the Democratic Party of the 80's."

Commenting that he could think of no previous campaign which had so successfully brought together such a variety of people, Rostenkowski noted their joint purpose..."defeating Ronald

with the strength, intelligence, and integrity of Walter Mondale."

State Director of the Illinois Mondale effort, James Margolis, noted the difficulty the campaign had in determining the Mondale-pledged delegate slates:

"We had the good fortune of having literally hundreds of prospective delegate candidates anxious to represent Walter Mondale on the ballot," said Margolis. "Choosing between so many of the campaign's strongest supporters -- almost all of whom would have made outstanding delegates -- was one of the hardest tasks I have ever faced." Continuing, the Illinois Director stated that the "final product is first rate and we now have before us a group of men and women who I believe will carry us on to a strong victory 76 days from today."

(The 154 men and women who will run as Mondale-committed delegates and alternates to the Democratic National Convention will seek election during the March 20 Illinois Primary. In addition 78 delegates and 27 alternates will be selected "At Large" by the Democratic Caucuses of the United States Congress and the Democratic State Central Committee. Caucus selections will occur in late January, the State Central Committee will make it's choices in May.

A number of former Vice President Mondale's most prominient political supporters are expected to be seated at the National Convention either as Members of Congress, elected officials or party officers. Thus, they are not necessarily represented on the slates being announced today.)

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ATTACHMENT E

State of Pennsylvania)
City of Philadelphia)

A F F I D A V I T

KNOW ALL MEN BY THESE PRESENTS:

That I, Nicole Chambers, N.C. AKA: Josephine Rivers NC residing at 2130 Wallace Street, Philadelphia, Pennsylvania, Telephone: (215) 329-2726, being duly sworn, depose that:

1. On April 9, 1984, a little after 3:00 p.m., I went to the Mondale At-Large Delegate Committee office at 1420 Walnut Street Philadelphia, and volunteered to one of the people who seemed to be on the staff there to work for the Mondale Campaign. I talked to a girl named Wanda, not further identified, who said that since I was from Philadelphia and knew the city, that I could assist her in giving out supplies of campaign material to be distributed a little later that afternoon. Before leaving, she gave me a sample of those items which bear my initials "N.C." and the date "4/9" and are attached as Exhibits to this affidavit and are described as follows:

Exhibit 1: "Official MONDALE Delegate's Ballot" pertaining to the primary election on April 10, 1984, solicitng support for Mondale delegates and alternates to the Democratic National Convention from the Pennsylvania Second Congressional District. The bottom of the flyer was imprinted with: "Paid for by Second Congressional District Delegates for Mondale, "Anthony McNeil, Treasurer."

Exhibit 2: A flyer entitled "WALTER MONDALE CONFRONTS THE ISSUES: THREE-MILE ISLAND - WALTER MONDALE SAYS "NO" TO A RESTART OF TMI #1". At the bottom of

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the flyer is the annotation "Paid for by the Mondale At-Large Delegate Committee."

Exhibit 3: Flyer entitled "WALTER MONDALE CONFRONTS THE ISSUES: ISRAEL AND THE MIDDLE EAST." At the bottom of the flyer is the annotation "Paid for by the Mondale At-Large Delegate Committee.:

Exhibit 4: Flyer entitled WALTER MONDALE CONFRONTS THE ISSUES: SENIOR CITIZENS HAVE A RELIABLE FRIEND IN WALTER MONDALE." At the bottom of the flyer is the annotation: "Paid for by the Mondale At-Large Delegate Committee."

Exhibit 5: A flyer entitled "WALTER MONDALE CONFRONTS THE ISSUES: JOBS AND THE ECONOMY - WALTER MONDALE STANDS FOR JOBS." At the bottom of the flyer is the annotation "Paid for by the Mondale At-Large Delegate Committee.:

Exhibit 6: A tabloid entitled "FIVE REASONS WHY PENNSYLVANIA NEEDS WALTER MONDALE..." The tabloid bears the instruction, "VOTE FOR MONDALE AT-LARGE DELEGATES" and bears the names of W. Wilson Goode, Richard S. Caliguiri, Ed Rendell, and Lou Tullio. The front of the tabloid bears the statement "Paid for by the Mondale At-Large Delegate Committee."

Exhibit 7: A flyer entitled "WALTER F. MONDALE ON CIVIL RIGHTS and CIVIL LIBERTIES." At the bottom of the flyer

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is the annotation "Paid For By the At-Large Delegate Committee for Mondale."

Exhibit 8: A flyer in Spanish entitled, "MONDALE HA PROBADO SER UN AMIGO DE LOS HISPANOS." At the bottom of the flyer is the annotation in English "Paid for by the Mondale At-Large Delegate Committee.

Exhibit 9: A two-page flyer with the heading on the front "On Key Issues, Good Ideas Top 'New' Ideas'... Mondale tops Hart." The back of the flyer is headed "ISSUE...MONDALE.....HART." The flyers are noted to be issued by: "PENNSYLVANIA AFL-CIO COPE."

2. I went back to the Mondale At Large Delegate Committee at about 4:30 and assisted "Wanda" until about 6:00 PM with distribution of packets of the material described above to different areas of Philadelphia depending on the individuals who came in to distribute it and the area to which it was going to be distributed. The people coming in to get the material all seemed to be volunteers and, for the most part, were high school or college age young adults.

WITNESS THE FOLLOWING Signature: Nicole Chambers
Josefina Rivera

Nicole Chambers AKA: Josefina Rivera

State of Pennsylvania)
County of Phila)

I, Robert J. Wescott, a Notary Public in and for the County aforesaid, in the State of Pennsylvania, do hereby certify that Nicole Chambers, whose name is signed to the foregoing affidavit, personally appeared before me in my County aforesaid and swore and acknowledged the same this 17 day of May 1984.

ROBERT J. WESCOTT, JR.
Notary Public, Phila., Phila. Co.
My Commission Expires Feb. 23, 1987

Robert J. Wescott
Notary Public

My Commission expires on the 23 day of Feb, 1987.

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EXHIBIT 1

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**
179 Herman **WOODEN**
184 Ann J. **LAND**
185 Arnold C. **STORR**

ALTERNATE DELEGATE

195 Dennis C. **WHITE**
197 Jeffrey D. **MORAN**
199 Leslie B. **KERNODLE**

Paid for by Second Congressional Delegates for Mondale
Gregory McNeil Treasurer

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EXHIBIT 2

WALTER MONDALE CONFRONTS THE ISSUES:

THREE MILE ISLAND

WALTER MONDALE SAYS "NO" TO A RESTART OF TMI #1





Five years ago, the nation suffered through a nightmare that lasted a week. But for the people of Central Pennsylvania, the nightmare has never ended. And today all Americans must realize that what happened at TMI—the most serious accident in our 27 years of commercial nuclear power—could happen again . . . anywhere and anytime.

TMI changed lives forever. Here it has left parents with doubts about the health of their children; it has sown fear about the quality of your air and water; it has left families uncertain whether to risk having children at all. TMI has disturbed our confidence in the ability of public utilities to serve the public interest—and the ability of public servants to guard it.

The run-around has gone on long enough. After five years, there's still no clean-up at the plant—despite all of industry's promises. And in Washington, the investigators still haven't gotten to the bottom of the mess. There are many unanswered questions about the accident itself: Did Metropolitan Edison falsify data? Were illegal shortcuts taken in the clean-up? Did General Public Utilities try to shift the blame? Did GPU try to cover up critical consultants' reports?

These are crucial questions which bear directly on the safety of the nuclear plant, the integrity and reliability of management and the lives of the people who live nearby. But we don't have the answers—and if the Nuclear Regulatory Commission has its way, we may never know.

The answers to our questions shouldn't be satisfactory only to Metropolitan Edison or the NRC or the Reagan Administration—they must be satisfactory to the people who live and work near TMI and to the American people.

V O T E • F O R

MONDALE

SUPPORT THE MONDALE AT LARGE DELEGATES

RL 49 [illegible]

Paid for by the Mondale At-Large Delegate Committee

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EXHIBIT 3

WALTER MONDALE CONFRONTS THE ISSUES:

ISRAEL & THE MIDDLE EAST



Israel and the Middle East: Walter Mondale's record in the U.S. Senate is second to none in support of Israel, and he has worked hard to prevent the sale of weapons to Arab nations. As Mayor Ed Koch of New York City says, "On the issue of Israel's security, there is no one who comes close to Walter Mondale."

Vice President Walter Mondale demonstrated this commitment in 1978 when he traveled to the Middle East and got the peace process moving between Egypt and Israel, helped persuade Begin and Sadat to negotiate face to face, and played a critical role in the success of the Camp David talks.

Walter Mondale holds these principles for peace in the Middle East:

- continues to insist that we will neither recognize nor negotiate with the PLO until it first recognizes the State of Israel, abandons terrorism and accepts the terms of UN resolutions 242 and 338
- remains committed to a Jerusalem united forever with free access to the holy places
- no sales of sophisticated military equipment to Israel's neighbors which could disrupt the military balance and impair the security of Israel
- the leaders of the other Arab nations must follow Sadat's lead and sit down face-to-face with Israel at the bargaining table

VOTE • FOR

MONDALE

SUPPORT THE MONDALE AT LARGE DELEGATES

AL #9 [illegible] #3 [illegible]

Paid for by the Mondale At-Large Delegate Committee

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EXHIBIT 4

WALTER MONDALE CONFRONTS THE ISSUES:

SENIOR CITIZENS HAVE A RELIABLE FRIEND IN WALTER MONDALE





Throughout his 20 years of public service—especially as a U.S. Senator and as Vice President—Walter Mondale has protected and promoted the interests of elderly Americans. That's only one reason why some of the most respected and effective senior citizens organizations have embraced the Mondale campaign. They know that as President, Walter Mondale will keep his commitment to:

- ensure the long-term integrity of the Social Security system so that the social compact honored by generations of Americans will not be broken
- expand Medicare and Medicaid to meet the health needs of the elderly
- get tough with the soaring costs of health care—contain these costs with legislation which simultaneously protects the quantity and quality of health care for the elderly
- abolish mandatory retirement for older men and women who want to remain in their jobs and careers
- adopt and enforce adequate regulations to ensure the safety and dignity of older Americans who reside in nursing homes

V O T E • F O R

MONDALE

SUPPORT THE MONDALE AT LARGE DELEGATES

Paid for by the Mondale At-Large Delegate Committee

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EXHIBIT 5

WALTER MONDALE CONFRONTS THE ISSUES:

JOBS & THE ECONOMY

WALTER MONDALE STANDS FOR JOBS:





Walter Mondale understands that the first priority in any successful Presidency is for Americans to have productive jobs. Pennsylvanians have been hit hard economically in the past four years—and they need a hard-hitting friend in the White House: Walter Mondale. With unemployment already at severe levels in steel and other basic industries across the state, another 350 jobs were lost early this month when the U.S. Steel plant closed in Johnstown—and yet another 3,800 steelworkers are to be laid-off by the end of April. Jobs have been cut in half at the Volkswagen plant in New Stanton—down to 2,500.

Walter Mondale has an aggressive plan to preserve and create jobs for Pennsylvania and the rest of America by:

- ensuring economic growth by slashing the incredible federal budget deficits and restoring sensible fiscal policies in Washington
- adopting a more aggressive trade policy—including matching other countries' export subsidies product for product and dollar for dollar—in order to persuade them to reduce those unfair subsidies
- promoting a full-employment policy aimed at ensuring jobs for all who want to work—especially young Americans who are hardest hit by unemployment
- revitalizing basic industries—including steel and automobiles—and creating incentives for reinvestment in existing plants
- investing more in training, retraining and education for coping with technological change and a more competitive world economy
- enacting tough plant-closing legislation to stem the *flow* of jobs to foreign countries with cheap labor

As Vice President, Walter Mondale took an active role in promoting the loan guarantee program for Chrysler in 1979, which saved 300,000 Chrysler jobs and 20,000 companies dependent on Chrysler. But Gary Hart voted firmly against it.

When the Wheeling-Pittsburgh Steel Co. needed loans in 1979 to open up a steel rail plant outside of Pittsburgh and remain competitive, Walter Mondale rallied to their support. But Senator Gary Hart was one of only six Democrats who voted against the loans needed by Wheeling-Pittsburgh, claiming "it is the worst possible form of government in the workplace. It is in fact a form of private socialism."

Walter Mondale supports domestic-content legislation aimed at creating and preserving jobs that otherwise would be lost to imports. But Gary Hart opposes this sorely needed assistance.

V O T E • F O R

MONDALE

SUPPORT THE MONDALE AT LARGE DELEGATES

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Paid for by the Mondale At-Large Delegate Committee

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EXHIBIT 6

FIVE REASONS WHY PENNSYLVANIA NEEDS WALTER MONDALE



VOTE for
MONDALE DELEGATES
ON TUESDAY, APRIL 10th

Paid for by the Statewide At-Large Delegate Committee

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1. JOBS & THE ECONOMY

Walter Mondale Stands for Jobs

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2. SENIOR CITIZENS

Walter Mondale Stands for Senior Citizens

Throughout his 20 years of public service—as especially as a U.S. Senator and as Vice President—Walter Mondale has protected and promoted the interests of elderly Americans. That's only one reason why some of the most respected and effective senior citizens organizations have embraced the Mondale campaign. They know that as President, Walter Mondale will keep his commitment to:

- ensure the long-term integrity of the Social Security system so that the social compact honored by generations of Americans will not be broken
- expand Medicare and Medicaid to meet the health needs of the elderly
- get tough with the soaring costs of health care—contain these costs with legislation which simultaneously protects the quantity and quality of health care for the elderly
- abolish mandatory retirement for older men and women who want to remain in their jobs and careers
- adopt and enforce adequate regulations to ensure the safety and dignity of older Americans who reside in nursing homes



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3. FOREIGN POLICY

Walter Mondale Will Bring Us A SAFER WORLD

As the most active Vice President in the history of the office, Walter Mondale is more experienced in foreign policy and running the federal government than any candidate for the Presidency—including Ronald Reagan. He was the first candidate to support the nuclear freeze—and as President he will immediately act to negotiate with the Soviet Union and lead us back from the brink of nuclear peril. His foreign policy is focused on:

Israel and the Middle East: Walter Mondale's record in the U.S. Senate is second to none in support of Israel, and he has worked hard to prevent the sale of weapons to Arab nations. As Mayor Ed Koch of New York City says, "On the issue of Israel's security, there is no one who comes close to Walter Mondale."

Vice President Walter Mondale demonstrated this commitment in 1978 when he traveled to the Middle East and got the peace process moving between Egypt and Israel, helped persuade Begin and Sadat to negotiate face to face, and played a critical role in the success of the Camp David talks.

Walter Mondale holds these principles for peace in the Middle East:

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- remains committed to a Jerusalem united forever with free access to the holy places
- no sales of sophisticated military equipment to Israel's neighbors which could disrupt the military balance and imperil the security of Israel
- the leaders of the other Arab nations must follow Sadat's lead and sit down face-to-face with Israel at the bargaining table

Central America: Walter Mondale's objective in Central America is clear. First, we must achieve an agreement for mutual non-intervention by all outside interests, and second, achieve a mutual withdrawal of forces. America must let the people of Central America work out their own histories.

As President, Mondale would reduce the number of U.S. troops in Honduras, but before totally withdrawing them he would seek to negotiate an agreement with Nicaragua to:

- remove any and all Cuban forces there
- ban the use of MIGs in the area
- secure an enforceable agreement on non-intervention.

Europe: Walter Mondale has pledged to keep faith with our European allies and as President he will not reduce the United States' troop commitment in Europe. He also would help America's allies preserve their access to Persian Gulf oil.

4. THE STATE & THE CITIES

Walter Mondale is a Friend of Pennsylvania and our cities

Throughout his political career, Walter Mondale has been a forceful advocate of America's cities—that's one reason why the mayors of Philadelphia, Pittsburgh, New York, Los Angeles, San Francisco, Seattle, Miami, San Antonio and many other cities have warmly endorsed Walter Mondale.

These men and women appreciate Walter Mondale's pledges to restore funding to the federal programs—Medicare, child nutrition, day care, mass transit assistance and housing aid—which have been ravaged by the Reagan budget cuts. And these urban leaders can see the profound differences between Walter Mondale and Gary Hart—especially Mondale's greater concern for minorities and the cities, and his more mature and developed leadership capacity. They know that Walter Mondale is committed to

Fair Taxation: When it comes to the issue of tax equity, Walter Mondale opposes the decline in corporate tax revenues to less than [illegible]. He favors a 15 percent minimum corporate tax and a surtax on individuals with profits of more than $500,000 a year. He also would reduce personal income tax "indexing" to help ensure that only those taxpayers earning $50,000 a year or less [illegible]. Gary Hart, on the other hand, has flirted with a potentially regressive flat tax proposal, which could cripple growth without balancing the [illegible].

Protecting Our Environment and Ground Water while reversing the Reagan record of coddling the corporations through lax enforcement of our environmental laws and granting tax advantages.

Rebuilding Our National Infrastructure—the highways, bridges and waterways which are the arteries of America's economy.

TMI—ensuring that the nuclear facility at Three Mile Island is kept shut down —or that it never again threatens the people of Pennsylvania and surrounding states.



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5. GOOD IDEAS VS "NEW IDEAS"

Walter Mondale Knows the Difference



Here is a sampling of some of Senator Gary Hart's new ideas. Take a good look, Pennsylvania.

- More than $900 a year should be deducted from the individual paychecks of working men and women to be placed in government accounts—so that if they lose their jobs they can withdraw from the account to pay for retraining or further education.
- College students ought to pay interest on student loans—while they are still in college.
- A fee of $30 per barrel should be imposed on all oil imported into the U.S. The consequences: Families in the Northeast—where so much imported oil is consumed—who heat with oil would pay at least $1200 more each year in heating costs and another $1200 more in gasoline costs. Prices paid by the average family for goods and services would rise by $2000.
- Employers should be allowed to pay *less* than the minimum wage (55 percent to young men and women who want jobs under the age of 20).
- The nuclear arms "build-down", which Gary Hart co-sponsored in the Senate more than a year ago and still endorses, was designed by Republicans to undermine the nuclear freeze movement. The "build-down" would allow one new high-technology nuclear weapon to be built for every two "old" weapons destroyed.

Why Mondale will defeat Ronald Reagan in November:

- Mondale's experience and proven leadership
- Mondale's personal and political values
- Mondale's broad-based national support

Walter Mondale is the one candidate with the experience and leadership to move America in the right direction as we approach the 1990's.

What really matters to Pennsylvanians in the April 10th primary—as it should in all elections—are the issues of principle, policy and character. Unlike his opponents, Walter Mondale is an experienced leader who knows himself and what he believes in. Walter Mondale is not an "overnight sensation"—he is rooted firmly in a political tradition of government which serves people.

Ask yourself: which of the Democratic candidates you would rather have sitting across the table from the new Soviet leader in some summit talks?

Ask yourself: which Democratic candidate would put America's full resources behind creating and preserving jobs in our countries basic industries such as steel and autos?

The answer is Walter Mondale. During his long career of public leadership, Mondale has worked at every level of government—from the courthouse as Minnesota Attorney General to the U.S. Senate and the White House as Vice President.

Mondale will quit blaming the government for America's problems and will start leading it to solve them.

As a regular newspaper editorial writer in New York City concluded a few days ago, in the face of sudden, voter interest in Gary Hart, "Walter Mondale has not trimmed his sails—but continued to sail against the wind. We think he has chosen the course of principle—confident that by November the voters victimized by Reaganism can constitute a landslide behind him."

VOTE • FOR

MONDALE

AT-LARGE DELEGATES

W. WILSON GOODE RICHARD S. CALIGUIRI ED RENDELL LOU TILLIO

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EXHIBIT 7



WALTER F. MONDALE
ON
CIVIL RIGHTS And CIVIL LIBERTIES

MONDALE'S RECORD AS UNITED STATES SENATOR

- Mondale was an original cosponsor of the historic Voting Rights Act of 1965 and spoke out strongly against all attempts to weaken it during Senate debate.
- He introduced sweeping fair housing legislation in 1967 and 1968. After prolonged filibuster and cloture fights, this landmark legislation was enacted into law.
- As Chairman of the FBI Subcommittee of the Select Committee on Intelligence, he personally investigated the Bureau's vendetta against Martin Luther King Jr.
- Proclaiming in 1970 that "I would rather lose my public career than give up on civil rights," Mondale became a leading defender of the federal judiciary's constitutional right to employ busing as a method of desegregating schools.

VOTE

LOOK BEYOND THE SLOGANS TO THE ISSUES...VOTE

MONDALE

and MONDALE DELEGATES

MATTHEW DAVIS	ROSALEE GEORGE	PATRICIA S. HALPIN
ANN J. LAND	FRED LUKE	BLONDELL REYNOLDS
DORIS A. SMITH	ARNOLD STORR	HERMAN WOODEN
LESLIE B. KERNODLE, ALT.	JEFFREY MORAN, ALT.	DENNIS WHITE, ALT.

AND AT-LARGE DELEGATES

Paid for by the At-Large Delegate Committee for Mondale

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EXHIBIT 8

MONDALE HA PROBADO SER UN AMIGO DE LOS HISPANOS





A través de sus 25 años de servicio público. Walter Mondale ha trabajado para proteger y promover los intereses de los hispanos. Walter Mondale fue el principal defensor de la ley que fomentara y aumentaría el número de votantes hispanos, y de mujeres y hombres en cargos políticos en el gobierno.

Walter Mondale comprende las necesidades de los hombres, mujeres y niños hispanos y como Presidente el seguirá siendo nuestro defensor en areas tan importantes como:

TRABAJOS: Walter Mondale se ha comprometido a restaurar nuestras industrias básicas, las cuales ayudarán a nuestros obreros en todos los niveles de la economía, creando el entrenamiento apropriado para los trabajadores que hayan perdido sus trabajos, y una agresiva poliza de comercio que proteja, y cree nuevas fuentes de trabajo a través del pais.

EDUCACIÓN: Cuando Walter Mondale era Senador, apoyó y ayudó para que la educación bilingue llegara a nuestras escuelas. El cree que nuestro sistema educacional es uno de los problemas más importantes, y esta decidido a restaurar las reducciones de Reagan en las escuelas y asegurar que nuestros hijos tengan una educación universitaria.

PERSONAS MAYORES: (Ancianos) Walter Mondale es uno de los defensores originales del Medicare y Medicaid, y se ha mantenido firme contra las crueles propuestas de la administración de Reagan de cortar la ayuda social a los ancianos y a los pobres.

El ampliará estos programas de ayuda y tambien esta dedicado ha protejer el seguro social. (Social Security).

INTERESES: Ha sido siempre un sueño para todos los americanos de tener su casa propia. Ronald Reagan nos ha negado este sueño, y a nosotros hijos, creando una situación económica que los intereses "suban por las nubes" Y haga el sueño de comprar una casa fuera de nuestro alcance económico. MONDALE urge que se aumenten los fondos para construir casas de vivienda que puedan ser compradas por las familias de ingresos bajos o moderados.

VOTA POR

MONDALE

Y POR LOS DELEGADOS DE MONDALE

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Paid for by the Harold Ickes Delegate Committee

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EXHIBIT 9

On Key Issues, Good Ideas Top 'New Ideas'... Mondale Tops Hart

Following is a comparison of the records of Walter Mondale and Gary Hart, the two leading candidates for the Democratic nomination, on eight key issues for working people and their families.

The comparison shows clearly that in concern for the well-being of average Americans, on the basis of record and program and a vision of what America can be, Walter Mondale's "good idea" candidacy holds out vastly more promise, and is fairer, than Gary Hart's "new idea" candidacy.

ISSUE	MONDALE	HART
Jobs, the economy	Proposes full employment law with teeth in it, policies that protect, expand jobs: revival of basic industries; trade that increases rather than costs U.S. jobs; rebuilding roads, bridges, ports, transport systems; lower interest rates; tax justice that obliges corporations, rich individuals to pay fair share.	Voted against jobs for U.S. auto workers in opposing Chrysler loan; opposes domestic content bill; opposed designating some defense contracts for high jobless areas; espouses "free trade" in a world where it's a myth, while hundreds of thousands of U.S. workers lose jobs to unfair foreign competition.
Help for the jobless	As Senator, consistently supported improved, extended benefits for jobless workers. Backs special aid for workers displaced by imports.	Backed Reagan cuts in special help for thousands of workers displaced by imports. Voted to force jobless workers to accept any "reasonable" job, including minimum wage.
Trade	Would make trade a two-way street helping U.S. workers and industries as well as our trading partners. Insists they remove barriers to U.S. products to encourage real free flow of goods.	Voted against "buy American" proposal in government-funded public works, denying U.S. workers benefit in terms of jobs from funds put up by U.S. taxpayers. No call to trading partners to remove barriers to U.S. goods.
Job Safety/ Health	Sponsored, fought for, voted for original job safety/health law; urges strengthening law and its enforcement.	Has voted at least four times in U.S. Senate to weaken job safety/health law and/or reduce its coverage.
Taxes	Would close loopholes for corporations, wealthy individuals; revoke most of huge Reagan tax hand-outs to rich; impose heavier windfall profits tax on Big Oil. Over-all, would seek to oblige corporations and the rich to pay fair share of tax burden, as workers always have.	Calls for so-called "consumption tax" under which you pay taxes based on what you buy. If most of your income is for necessities, you'd pay higher percentage than coupon-clippers. Voted against adequate tax on windfall oil profits.

Vote — Your Job Depends On It

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ISSUE	MONDALE	HART
Housing	Urges increased funding to construct homes within financial reach of low and middle income families.	In Senate, has voted several times to deny adequate funding for low and middle income housing.
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.
Youth	Opposes slashing minimum wage for teenagers because it invites employers to fire adult workers, hire lower-paid youth; backs generous low interest college loans and to permit recipients to begin payment upon graduation.	Voted for sub-minimum wage revolving door scheme (adults out, lower-paid youth in); voted to make recipients of Federal college loans pay additional interest.

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Mondale: A Good Idea of What America Can Be

VOTE MONDALE

Democratic Primary

Vote for a Better Tomorrow!

PENNSYLVANIA AFL-CIO COPE

JULIUS UEHLEIN
Chairman

ROBERT McINTYRE
Director

JUDITH HEH
Secretary/Treasurer

PENNSYLVANIA CHARTERED AFL JUNE 1948 AFL-CIO

Bauer

STATE OF PENNSYLVANIA)
CITY OF PHILADELPHIA)

A F F I D A V I T

KNOW ALL MEN BY THESE PRESENTS:

THAT I, DONALD B. PRIESTLEY, residing at 3402 "G" Street, Philadelphia, Pennsylvania, 19134, Telephone: (215) 426-4618, an investigator for twenty-five (25) years, being duly sworn, depose that:

1. On April 9th and 10th, 1984, in connection with an investigation of possible violations by organized labor of Federal Election Commission (FEC) Regulations related to the U.S. Presidential primary campaign, I went to the Democratic Party of Upper Darby, Pennsylvania office which is in the Pennsylvania Seventh Congressional District, and located at 7016 Terminal Square, Upper Darby, Pa. as a volunteer to work on behalf of Senator Mondale's Presidential campaign.

2. Although the office is at Upper Darby Democratic office, it seemed that mostly all of the activities and posters were on behalf of Mondale.

3. On April 9th, I was in the office approximately two hours in the afternoon. While in the office, I was on the ground floor, but from the activities and voices I heard, the Mondale staffers and workers seemed to be working more out of the loft area to which I did not gain access. The only persons on the ground floor were a "Bob" and an "Obbie" who just seemed to be volunteers who were manning the office. The only activity that really seemed to be occurring was incoming

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telephone calls asking about transportation to the polls on April 10th, and Bob seemed to be handling that activity. There was some discussion that vans and other vehicles were going to be obtained to pick up people who would vote for Mondale, but I could not determine any further details of the arrangements except that callers were told to call the Democratic Committee at 352-5221 on April 10th for assistance. Before I left the office, I was asked to assist on April 10th if I would be available.

4. On April 10th, 1984 I went to the Democratic Party of Upper Darby office at about 6:00 a.m. to volunteer to assist. I remained until about 9:45, and during the time I was at the office, I identified the following individuals in the office:

a. Cathy Tuttillo (phonetic), a white female probably in her twenties, about 5'8" tall, about 125-130 pounds with shoulder length, auburn hair. She appeared to be a Mondale staffer as opposed to a volunteer, especially in the way that she associated with Mike Hackman, described in "b" below and the man described in "c" below, whom I also believe to be Mondale staff people. She was the one who had the key and unlocked the office at about 6:30 a.m. There was some discussion between Tuttillo and the man described in "c" below as to when and where they would be going after the Pennsylvania election. From the conversation, it seemed that they were each going different places and that one of them, I believe it to have been Tuttillo, was going to Texas.

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b. Mike Hackman (phonetic). He is a white male, probably about twenty-five years of age, about 6' tall and approximately 155-160 pounds and having dark hair and a mustache. He arrived at about 8:30 and seemed to be a Mondale staff person, especially by the way he greeted Cathy Tuttillo upon her arrival and the manner in which he conversed rather privately with the man described in "c" below, both of whom I believe to be Mondale staffers. From the general conversation, it was apparent he did not reside locally. He answered the phones and was quite active in the office, but it did not necessarily seem as though he was in charge.

c. A white male, whose name I do not know, approximately 45-50 years of age, 5'8", 145-150 pounds, slight build with grayish hair, glasses and wearing a gray suit, came into the office sometime after 9:00. He seemed to be the one in the office treated with the most deference and seemed to be the one making decisions. While in the office, he received one phone call, after which he made the statement that it was from "Center City," but I did not overhear any of the conversation. By conversation with Cathy Tuttillo as to where and when they would be going after the Pennsylvania election, and from the manner in which he spoke to Tuttillo and Mike Hackman, I believe that he did not reside locally, and was a paid Mondale staff person. He seemed to be rather well acquainted with "Randy," described in "e" below, and spoke to him inside and outside the office. When he left the office, he said he was going to South Philadelphia and there was some conversation that

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although violence had been threatened in connection with a congressional race in South Philadelphia during the election, that it was hoped there would be none.

d. A "Mondale Delegate," whose name I do not know, arrived at about 8:30 a.m. He wore a white metal badge with "Mondale" imprinted thereon and with two blue ribbon streamers attached to it and the printing "DELEGATE" on a streamer. He is a white male about 6'2", about 210-220 pounds, in his mid-thirties with brown hair and full beard. I saw him driving a new red Ford Thunderbird model car. I observed him in a rather private conversation with the man described in "c" above.

e. "Randy," a white male whose last name I do not know but who is approximately 35-36 years of age, about 5'9" tall, with dark hair and who is heavy set, wore sun-glasses but carried them in his hand while in the office, arrived about 9:00 a.m. He was greeted by the man in "c" above who said "How are you doing Randy?" He stayed in the office between twenty minutes and one-half hour and while in the office, he talked to everyone there, but more so with the older male described in (c) above both outside on the sidewalk and also inside in a corner of the office. Also, the man described in "c" above, upon parting, said to Randy: "See you at the party tonight." To my question as to who this individual was after his departure, someone replied: "That was Randy." Although I subsequently determined from news accounts that a Randy Canale is the president of the Delaware County Pennsylvania AFL-CIO Council, and that Upper Darby is located in

3504050430 1

Delaware County, I could not determine whether the individual identified as "Randy" was the same as Randy Canale.

WITNESS THE FOLLOWING Signature:

Donald B. Priestley
DONALD B. PRIESTLEY

STATE OF PENNSYLVANIA)
COUNTY OF PHILADELPHIA) To-Wit:

I, Annie M. Smith, a Notary Public in and for the County aforesaid, in the State of Pennsylvania, do hereby certify that Donald B. Priestley, whose name is signed to the foregoing Affidavit, personally appeared before me in my County aforesaid and swore and acknowledged the same this 14 day of May, 1984.

Annie M. Smith
Notary Public

My Commission expires on the 26 day of October, 1987.

8504050430 2

STATE OF PENNSYLVANIA)
CITY OF PHILADELPHIA)

AFFIDAVIT

KNOW ALL MEN BY THESE PRESENTS:

THAT I, JAMES P. CARINO, III, residing at 1142 Stony Lane, Gladwyne, Pennsylvania 19035, Telephone: (215) 525-1219, a private investigator for six (6) years, being duly sworn, depose that:

1. On April 7, 1984, in connection with an investigation of possible violations by organized labor of Federal Election Commission (FEC) Regulations during the U.S. Presidential primary campaign, I went to the Democratic Party of Upper Darby, Pennsylvania office which is in the Pennsylvania Seventh Congressional District and located at 7016 Terminal Square, Upper Darby, Pa.

2. Although the office is the Upper Darby Democratic office, it seemed that all of the activities and posters were on behalf of Mondale. While in the office, I was on the ground floor, but from the activities and voices I heard, it seemed to me that Mondale people seemed to be working more out of the loft area to which I did not gain access.

3. While in the office, I met a young man sitting at a table who was in his mid-twenties, about 5'10", with dark hair and a mustache whom I later identified as Mike Hackman. He said he was a paid Mondale campaign organizer and said he had also been a Mondale staffer during the New Hampshire

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presidential primary campaign. He explained that he had sent a resume to the Mondale campaign in Washington, D.C. and one day they called him and sent him to work in New Hampshire. He said that he was paid for being a staff person, but inferred that his wages were relatively low. He did not specifically say who was paying him. I noted that Hackman was wearing a gold pin in the shape of a map of Pennsylvania with the name "Mondale" printed in black thereon, which may have been indicative of his being a staff person as opposed to a volunteer.

4. Also sitting at the table with Mike Hackman was a young woman in her early twenties, rather heavy set, with dark blond curley hair and freckles, but whose name I do not know. She was wearing a "Mondale" pin like Mike Hackman. It seemed like she wanted to talk and answer my questions but seemed to be discouraged by an Alternate Mondale Delegate (described below) who seemed to take over the answering of questions. I gained the impression from this girl that if she were a paid staff person for Mondale, that she lived locally.

5. Also, I met a Mondale Alternate Delegate who I subsequently determined by deduction was Mary Baulis, as that was the only Alternate Delegate listed on a sample ballot for Mondale Delegates in the Pennsylvania Seventh Congressional District. She made the statement that she and all the delegates were "receiving union support," and she showed me a Mondale flyer they were using that said "Labor Donated",

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attached hereto as Exhibit 1. I was in the office when she departed with campaign literature that she said she was distributing door to door, but only to registered Democratic voters, and she showed me a listing of those voters, which she was taking with her.

6. Mike Hackman made the statement that the Delegates in that area were well organized and well motivated workers and that there was also a good core of volunteers helping. He cited, as an example, the young adults whom I also observed, who seemed to be the age of High School Seniors and who came into the office to get supplies of Mondale campaign literature and then depart to distribute it.

WITNESS THE FOLLOWING Signature:

James P. Carino III
JAMES P. CARINO, III

STATE OF PENNSYLVANIA)
COUNTY OF PHILADELPHIA) To-Wit:

I, Janie D. Roberts, a Notary Public in and for the County aforesaid, in the State of Pennsylvania, do hereby certify that James P. Carino, III, whose name is signed to the foregoing Affidavit, personally appeared before me in my County aforesaid and swore and acknowledged the same this 11 day of May, 1984.

Janie D. Roberts
Notary Public

My Commission expires on the 26 day of October, 1987

8504305

Mondale For President
For Pennsylvania

The Economy—Key to Our Future

The key to this nation's future is a healthy growing economy—an economy that provides jobs and opportunities for all Americans, and not just profits for the rich. We have to put people back to work. Without jobs, there is no fairness"—Walter Mondale

Here's how he'll do it:

Cut Reagan's record red-ink deficits—and cut them fast—by:

Stopping the Pentagon's waste and foolish spending. We can't afford to pay $110 for a 4-cent part; we can't afford to buy billion-dollar weapons that don't work.

Putting limits on how much the doctors and the hospitals can gouge Medicare and Medicaid and the public. Nobody should have to pay $200 a day for a hospital room or $65 to walk into a doctor's office.



Making the rich pay their fair share of taxes like everybody else.

Tell the Federal Reserve that we want monetary policies that make sense—that help people buy houses and cars and home appliances.

Put people—millions of men and women—back to work like FDR did, and retrain workers who were abandoned when their jobs were sent to Taiwan or Singapore.

Make pay equity a reality.

Tell government and business and labor, we have to work together to rebuild the nation's basic industries. We have to work together and stand together; there's no other way.



- Rebuild our nation's roads and bridges and dams and waterlines. These make up our nation's physical foundation, so they have to be sound.
- Enforce the civil rights laws so that women and minorities have a fair chance to get and keep a good job.
- Give smaller, creative companies an even break instead of passing out all the goodies to the big corporations. Big business doesn't need public assistance.
- See to it that American exporters don't get short-changed by other countries' unfair trading practices.
- Give family farmers a fighting chance against the giants of agribusiness.



- Bring the nation's governors and mayors together to forge a real partnership with the federal government to make this nation's cities good places to live.

"I know how to shape a government. I know how to lead. I know how to defend this country—and I know how to search for peace.

"In this, the nuclear age of doomsday weapons, we have to do everything in our power to ensure peace. The most awesome responsibility of the President is not only to keep us strong so that we don't invite attack, but to use all of our physical and moral strength to keep the peace and spare the world from holocaust."
—Walter Mondale

What about global brinksmanship saber-rattling? What about our increasing military involvement in Central America? Here's what Mondale will do:

- Strengthen our regular military forces.
- Get back to dealing with smaller nations as a friend instead of as a bully.
- Restore our nation's open commitment to human rights as the cornerstone of American foreign policy.
- Help poorer nations stand on their own feet. Democracy will never grow in the soil of poverty, oppression, and despair.
- Attract the people of Central America with our values—instead of scaring them with our weapons.



And what about nuclear weapons? Here's what Mondale will do:

- Sit down with the Russians and work out a mutual and verifiable freeze on nuclear weapons.
- Send the Salt II treaty to the Senate and support its ratification.
- Bury the MX missile boondoggle once and for all.
- Stop wasting money on nerve gasses and other indiscriminate killers.
- Put this nation out front again in the effort to halt the spread of nuclear weapons—and the threat of doomsday blackmail.

Education—the Future of Our Children—the Future of Our Nation.

"Getting this nation's schools back on the track will be one of the top priorities of the Mondale Administration. Everything depends on strong schools and strong colleges: a healthy economy, a strong defense, social justice, opportunity for all. There is no reason whatsoever why the next generation of Americans cannot be the best educated and trained in this nation's history."
—Walter Mondale



Here's how Mondale will go about it:

- Establish a Fund for Excellence to help local schools do a better job of teaching children.
- Start an "Education Corps" to attract bright and dedicated young people to teaching careers, and help the teachers already in the classroom to sharpen their skills.
- Give the nation's laboratories, libraries, and research centers the support they must have.
- Start a crash effort to give our kids better training in math, science, and languages. That's where tomorrow's jobs will be.
- Strengthen programs for rural and inner-city schools to give poor children an even break.



- Make sure that every American family, and not just the wealthy few, can afford to send their kids to college.
- Create awards to help gifted graduate students complete their training.
- Stop the loss of talent that occurs because of discrimination and sex stereotyping in schools.

EXHIBIT 1

ATTACHMENT H

State of Pennsylvania)
City of Philadelphia)

A F F I D A V I T

KNOW ALL MEN BY THESE PRESENTS:

That I, James P. Carino, III, residing at 1142 Stony Lane, Gladwyne, Pennsylvania, 19035 Telephone: (215) 525-1219, a private investigator for six (6) years, being duly sworn, depose that:

1. On April 7, 1984, in connection with an investigation of possible violations by organized labor of Federal Election Commission (FEC) Regulations related to the U.S. Presidential primary campaign, I went to the Democratic Party of Upper Darby, Pennsylvania office which is in the Pennsylvania Seventh Congressional District, and located at 7016 Terminal Square, Upper Darby, Pa.

2. While in the office, I determined from Mike Hackman, a Mondale staffer, and from Mary Baulis, an alternate Mondale Delegate, that Mondale campaign literature was being passed out in the Seventh Congressional District to registered Democratic voters by the delegates and volunteers, While in the office, I saw the Alternate Delegate and several young people come in, pick up supplies of flyers, and depart.

3. I was given a copy of the flyers that were being handed out and copies of which are Exhibits hereto and bear my hand-

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written initials "JPC", the date "4/7/84", and which are described as follows:

a. A sample ballot headed "VOTE APRIL 10th" and bearing the names of WALTER MONDALE and BOB EDGAR (whom I identified as a Democratic Congressional candidate for the Pennsylvania Seventh Congressional District) and "Delegates" as Beth Fitzsimmons, Evelyn Hess, Ron Pesotsky, Robert Avelino, and Nancy Baulis (Alternate), whom I identified as Mondale delegates in the Pennsylvania Seventh Congressional District. There was a statement on the sample ballot "Paid for by the Delegates for Mondale." A copy of this sample ballot is Exhibit 1.

b. A flyer entitled "GOOD IDEAS VS NEW IDEAS" - Mondale Knows the Difference". The bottom of the flyer instructs the reader to vote for Mondale and Mondale delegates Beth Fitzsimmons, Bob Avelino, Evelyn Hess, Ron Pesotsky, Nancy Baulis (Alternate) and At-Large Delegates and the statement "Paid for by the At-Large Delegate Committee for Mondale." A copy of this flyer is Exhibit 2.

c. Flyer entitled "Mondale - For President - For Pennsylvania: The Economy - Key to Our Future." There is a printed notation at the bottom of the flyer that it is: "-Labor Donated-". A copy of this flyer is Exhibit 3.

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WITNESS THE FOLLOWING Signature:

James P. Carino, III

State of Pennsylvania)

County of Philadelphia)

I, Janice A. Roberts, a Notary Public in and for the County aforesaid, in the State of Pennsylvania, do hereby certify that James P. Carino, III, whose name is signed to the foregoing affidavit, has personally appeared before me in my County aforesaid and swore and acknowledged the same this 14 day of May, 1984.

Janice A. Roberts
Notary Public

My Commission expires on the 26 day of October, 1987.

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EXHIBIT 1

VOTE
★APRIL 10th★

WALTER MONDALE	**E2**
BOB EDGAR	**E9**

DELEGATES

Beth Fitzsimons	**F17**
Evelyn Hess	**F21**
Ron Pesotsky	**G22**
Robert Avellino	**G23**

ALTERNATE

Nancy Baulis	**D26**

4/7/84

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EXHIBIT 2



GOOD IDEAS
VS.
"NEW" IDEAS

MONDALE KNOWS THE DIFFERENCE

JOBS, AND THE ECONOMY

MONDALE: Proposes full employment law with teeth in it, policies that protect, expand jobs, trade that increases rather than costs U.S. jobs, rebuilding roads, bridges, ports, transport systems.

HART: Voted against jobs for U.S. auto workers in opposing the Chrysler loan guarantee, opposes domestic content bill, espouses "free trade" in a world where it's a myth, while hundreds of U.S. workers lose jobs to unfair foreign competition. Supports the sub-minimum wage for teenagers.

SOCIAL SECURITY

MONDALE: Supports improvements in the minimum benefit level and in disability benefits.

HART: Opposed earmarking windfall profits tax revenues for Social Security.

SOARING 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: Voted with the American Medical Assoc. (AMA) and hospital lobby to oppose hospital cost containment.

OIL COMPANY PROFITS

MONDALE: Led the winning fight for a Windfall Profits Tax so that oil companies would pay their fair share.

HART: Opposed the corporate Windfall Profits Tax. Now proposes a $10/barrel surtax on imported oil, costing the average family more than $240/year.

THE NOMINATION FOR PRESIDENT SHOULD BE DECIDED ON THE ISSUES...NOT "NEW" IDEAS OR "OLD" IDEAS...BUT GOOD IDEAS VS. BAD IDEAS.

LOOK BEYOND THE SLOGANS TO THE ISSUES...VOTE

MONDALE

and MONDALE DELEGATES

BETH FITZSIMONS — EVELYN HESS

BOB AVELLINO — RON PESOTSKI

NANCY BAULIS – Alternate

AND AT-LARGE DELEGATES

Paid for by the At-Large Delegate Committee for Mondale

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Mondale for Pennsylvania

The Economy—Key to Our Future

"The key to this nation's future is a healthy growing economy—an economy that provides jobs and opportunities for all Americans, and not just profits for the rich. We have to put people back to work. Without jobs, there is no fairness"—Walter Mondale

Here's how he'll do it:

- Cut Reagan's record red-ink deficits—and cut them fast—by:

Stopping the Pentagon's waste and foolish spending. We can't afford to pay $110 for a 4-cent part; we can't afford to buy billion-dollar weapons that don't work.

Putting limits on how much the doctors and the hospitals can gouge Medicare and Medicaid and the public. Nobody should have to pay $700 a day for a hospital room or $65 to walk into a doctor's office.



Making the rich pay their fair share of taxes like everybody else.

- Tell the Federal Reserve that we want monetary policies that make sense—that help people buy houses and cars and home appliances.
- Put people—millions of men and women—back to work like FDR did, and retrain workers who were abandoned when their jobs were sent to Taiwan or Singapore.
- Make pay equity a reality.
- Tell government and business and labor, we have to work together to rebuild the nation's basic industries. We have to work together and stand together; there's no other way.



- Rebuild our nation's roads and bridges and dams and waterlines. These make up our nation's physical foundation, so they have to be sound.
- Enforce the civil rights laws so that women and minorities have a fair chance to get and keep a good job.
- Give smaller, creative companies an even break instead of passing out all the goodies to the big corporations. Big business doesn't need public assistance.



- See to it that American exporters don't get shortchanged by other countries' unfair trading practices.
- Give family farmers a fighting chance against the giants of agribusiness.
- Bring the nation's governors and mayors together to forge a real partnership with the federal government to make this nation's cities good places to live.

"I know how to shape a government. I know how to lead. I know how to defend this country—and I know how to search for peace.

"In this, the nuclear age of doomsday weapons, we have to do everything in our power to ensure peace. The most awesome responsibility of the President is not only to keep us strong so that we don't invite attack, but to use all of our physical and moral strength to keep the peace and spare the world from holocaust."
—Walter Mondale

What about global brinkemanship saber-rattling? What about our increasing military involvement in Central America? Here's what Mondale will do:

- Strengthen our regular military forces.
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- Restore our nation's open commitment to human rights as the cornerstone of American foreign policy.
- Help poorer nations stand on their own feet. Democracy will never grow in the soil of poverty, oppression, and despair.
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- Bury the MX missile boondoggle once and for all.
- Stop wasting money on nerve gasses and other indiscriminate killers.
- Put this nation out front again in the effort to halt the spread of nuclear weapons—and the threat of doomsday blackmail.

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"Getting this nation's schools back on the track will be one of the top priorities of the Mondale Administration. Everything depends on strong schools and strong colleges: a healthy economy, a strong defense, social justice, opportunity for all. There is no reason whatsoever why the next generation of Americans cannot be the best educated and trained in this nation's history."
—Walter Mondale



Here's how Mondale would go about it:

- Establish a Fund for Excellence to help local schools do a better job of teaching children.
- Start an "Education Corps" to attract bright and dedicated young people to teaching careers, and help the teachers already in the classroom to sharpen their skills.
- Give the nation's laboratories, libraries, and research centers the support they must have.
- Start a crash effort to give our kids better training in math, science, and languages. That's where tomorrow's jobs will be.
- Strengthen programs for rural and inner-city schools to give poor children an even break.



- Make sure that every American family, and not just the wealthy few, can afford to send their kids to college.
- Create awards to help gifted graduate students complete their training.
- Stop the loss of talent that occurs because of discrimination and sex stereotyping in schools.

EXHIBIT 3

ATTACHMENT I

STATE OF VIRGINIA)
COUNTY OF FAIRFAX)

AFFIDAVIT

KNOW ALL MEN BY THESE PRESENTS:

THAT I, ERNEST W. LYLES, a private investigator and an associate of Miller and Associates, Ltd. of Falls Church, Va., being duly sworn, depose that:

1. I was in the Philadelphia, Pa. area on April 6th, 1984 for an investigation of possible violations by organized labor of Federal Election Commission (FEC) Regulations in connection with the U.S. Presidential primary campaign.

2. During the course of my activities, I went to the Democratic Party of Upper Darby, Pennsylvania which is in the Pennsylvania Seventh Congressional District, and located at 7016 Terminal Square, Upper Darby, Pa. shortly before 5:00 P.M. Although the office was the Democratic Party office, I saw a number of "Mondale" posters displayed in the window, but only one for "Hart".

3. There were two men and a woman in their mid-twenties in the office and I asked them if they had any literature on "Mondale" that I could have. They gave me a total of forty-eight (48) flyers and told me to give the rest to my friends and other people.

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4. The flyers which they gave me are entitled "GOOD IDEAS VS. 'NEW' IDEAS - MONDALE KNOWS THE DIFFERENCE", and the bottom of the flyer instructs the reader to vote for "Mondale and Mondale delegates - Beth Fitzsimmons, Evelyn Hess, Bob Avellino, Ron Pesotski, Nancy Baulis (Alternate) and "AT-LARGE DELEGATES." There is also a statement at the bottom of the flyer: "Paid for by the At-Large Delegate Committee for Mondale." A copy of this flyer bearing the notation "7016 Terminal Sq., Upper Darby;" my handwritten initials "EWL", and "1650 hrs., 6 Apr. 84", is Exhibit 1 to this affidavit.

WITNESS THE FOLLOWING Signature:

ERNEST W. LYLES

STATE OF VIRGINIA)
COUNTY OF FAIRFAX) To-Wit:

I, Howard L. Hylton, a Notary Public in and for the County aforesaid, in the State of Virginia, do hereby certify that Ernest W. Lyles, whose name is signed to the foregoing Affidavit, has personally appeared before me in my County aforesaid and sworn and acknowledged the same.

Given under my hand this 15 day of May 1984.

Notary Public

My Commission Expires: 9 February 1985

8504314

EXHIBIT 1



GOOD IDEAS
VS.
"NEW" IDEAS

MONDALE KNOWS THE DIFFERENCE

JOBS, AND THE ECONOMY

MONDALE: Proposes full employment law with teeth in it, policies that protect, expand jobs, trade that increases rather than loses U.S. jobs, rebuilding roads, bridges, ports, transport systems.

HART: Voted against aids for U.S. auto workers in opposing the Chrysler loan guarantee, opposes domestic content bill, opposes "buy made" in a world where it's a myth, while hundreds of U.S. workers lose jobs to union foreign competition. Supports the sub-minimum wage for teenagers.

SOCIAL SECURITY

MONDALE: Supports massive money in the minimum benefit level and in disability benefits.

HART: Opposed earmarking windfall profits tax revenues for Social Security.

SOARING 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: Voted with the American Medical Assoc. (AMA) and hospital lobby to oppose hospital cost containment.

OIL COMPANY PROFITS

MONDALE: Led the winning fight for a Windfall Profits Tax so that oil companies would pay their fair share.

HART: Opposed the corporate Windfall Profits Tax. Now proposes a $10/barrel surtax on imported oil, costing the average family more than $340/year.

THE NOMINATION FOR PRESIDENT SHOULD BE DECIDED ON THE ISSUES...NOT "NEW" IDEAS OR "OLD" IDEAS...BUT GOOD IDEAS VS. BAD IDEAS.

LOOK BEYOND THE SLOGANS TO THE ISSUES...VOTE

MONDALE

and MONDALE DELEGATES

BETH FITZSIMONS
EVELYN HESS
BOB AVELLINO
RON PESOTSKI

NANCY BAULIS – Alternate

AND AT-LARGE DELEGATES

Paid for by the At-Large Delegate Committee for Mondale

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STATE OF VIRGINIA)
COUNTY OF FAIRFAX)

AFFIDAVIT

KNOW ALL MEN BY THESE PRESENTS:

THAT I, RICHARD E. LAWRENCE, a private investigator and an associate of Miller and Associates, Ltd. of Falls Church, Va, being duly sworn, depose that:

1. I was in the Philadelphia, Pennsylvania area on April 6, 1984, for an investigation of possible violations by organized labor of Federal Election Commission (FEC) Regulations in connection with the U.S. Presidential primary campaign.

2. I went to an office at 1420 Walnut Street where, in back of the office, was a large "Mondale At-Large Delegate Committee" sign. There did not seem to be much activity in the office at the time, other than people answering telephones, and I asked one of the people there who seemed to be on the staff, for any campaign material they had to give out.

3. I was given two items, one of which is a four page tabloid entitled "Five Reasons Why Pennsylvania Needs Walter Mondale". The tabloid bears the instruction "Vote for Mondale At-Large Delegates" and bears the names of W. Wilson Goode, Richard S. Caliguiri, Ed Rendell and Lou Tullio. The front of the tabloid bears the statement "Paid for by the Mondale At-Large Delegate Committee." A copy of this tabloid is Exhibit 1 to this Affidavit and bears my handwritten initials "REL" and the date "4/6/84".

8504315

4. The second item I was given was a sample ballot entitled "Official Mondale Delegate Ballot" and solicits the election of the Pennsylvania Second Congressional District Mondale delegates. There is a statement at the bottom of this ballot: "Paid for by the Second Congressional Delegates for Mondale, Anthony McNeil, Treasurer." A copy of this sample ballot is Exhibit 2 to this Affidavit and bears my handwritten innitials "REL" and the date "4/6/87".

WITNESS THE FOLLOWING Signature:

Richard E. Lawrence

RICHARD E. LAWRENCE

STATE OF VIRGINIA)
COUNTY OF FAIRFAX) To-Wit:

I, Howard L. Mason, a Notary Public in and for the County aforesaid, in the State of Virginia, do hereby certify that Richard E. Lawrence, whose name is signed to the foregoing Affidavit, has personally appeared before me in my County aforesaid and sworn and acknowledged the same.

Given under my hand this 15 day of May 1984.

Howard L. Mason

Notary Public

My Commission Expires: February 9, 1985

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EXHIBIT 1

FIVE REASONS WHY PENNSYLVANIA NEEDS WALTER MONDALE



VOTE for
MONDALE DELEGATES
ON TUESDAY, APRIL 10th

REL
4/6/84

Paid for by the Mondale At-Large Delegate Committee

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1. JOBS & THE ECONOMY

Walter Mondale Stands for Jobs

Walter Mondale understands that the first priority in any successful Presidency is for Americans to have productive jobs. Pennsylvanians have been hit hard economically in the past four years—and they need a hard-hitting friend in the White House: Walter Mondale. With unemployment already at severe levels in steel and other basic industries across the state, another 350 jobs were lost early this month when the U.S. Steel plant closed in Johnstown—and yet another 3,800 steelworkers are to be laid-off by the end of April. Jobs have been cut in half at the Volkswagen plant in New Stanton—down to 2,500.

Walter Mondale has an aggressive plan to preserve and create jobs for Pennsylvania and the rest of America by:

- ensuring economic growth by slashing the incredible federal budget deficits and restoring sensible fiscal policies in Washington
- adopting a more aggressive trade policy—including matching other countries' export subsidies product for product and dollar for dollar—in order to persuade them to reduce these unfair subsidies
- promoting a full-employment policy aimed at ensuring jobs for all who want to work—especially young Americans who are hardest hit by unemployment
- revitalizing basic industries—including steel and automobiles—and creating incentives for reinvestment in existing plants
- investing more in training, retraining and education for coping with technological change and a more competitive world economy
- enacting tough plant-closing legislation to stem the flow of jobs to foreign countries with cheap labor



As Vice President, Walter Mondale took an active role in promoting the loan guarantee program for Chrysler in 1979, which saved 300,000 Chrysler jobs and 20,000 companies dependent on Chrysler. But Gary Hart voted firmly against it.

When the Wheeling-Pittsburgh Steel Co. needed loans in 1979 to open up a steel-rail plant outside of Pittsburgh and remain competitive, Walter Mondale rallied to their support. But Senator Gary Hart was one of only six Democrats who voted against the loans needed by Wheeling-Pittsburgh, claiming "it is the worst possible form of government in the workplace. It is in fact a form of private socialism."

2. SENIOR CITIZENS

Walter Mondale Stands for Senior Citizens

Throughout his 20 years of public service—as especially as a U.S. Senator and as Vice President—Walter Mondale has protected and promoted the interests of elderly Americans. That's only one reason why some of the most respected and effective senior citizens organizations have embraced the Mondale campaign. They know that as President, Walter Mondale will keep his commitment to:

- ensure the long-term integrity of the Social Security system so that the social compact honored by generations of Americans will not be broken
- expand Medicare and Medicaid to meet the health needs of the elderly
- get tough with the soaring costs of health care—contain these costs with legislation which simultaneously protects the quantity and quality of health care for the elderly
- abolish mandatory retirement for older men and women who want to remain in their jobs and careers
- adopt and enforce adequate regulations to ensure the safety and dignity of older Americans who reside in nursing homes



3. FOREIGN POLICY

Walter Mondale Will Bring Us A SAFER WORLD

As the most active Vice President in the history of the office, Walter Mondale is more experienced in foreign policy and running the federal government than any candidate for the Presidency—including Ronald Reagan. He was the first candidate to upgrade the nuclear freeze—and as President he will immediately act to negotiate with the Soviet Union and lead us both from the brink of nuclear peril. His foreign policy is focused on:

Israel and the Middle East: Walter Mondale's record in the U.S. Senate is second to none in support of Israel, and he has worked hard to prevent the sale of weapons to Arab nations. As Mayor Ed Koch of New York City says, "On the issue of Israel's security, there is no one who comes close to Walter Mondale."

Vice President Walter Mondale demonstrated this commitment in 1978 when he traveled to the Middle East and got the peace process moving between Egypt and Israel, helped persuade Begin and Sadat to negotiate face to face, and played a critical role in the success of the Camp David talks.

Walter Mondale holds these principles for peace in the Middle East:

- assistance to insist that we will neither recognize nor negotiate with the PLO until it first recognizes the State of Israel, abandons terrorism and accepts the terms of UN resolutions 242 and 338
- remain committed to a Jerusalem united forever with free access to the holy places
- no sales of sophisticated military equipment to Israel's neighbors which could disrupt the military balance and imperil the security of Israel
- the leaders of the other Arab nations must follow Sadat's lead and sit down face-to-face with Israel at the bargaining table

Central America: Walter Mondale's objective in Central America is clear. First, we must achieve an agreement for mutual non-intervention by all outside interests, and second, achieve a mutual withdrawal of forces. America must let the people of Central America work out their own histories.

As President, Mondale would reduce the number of U.S. troops in Honduras, but before totally withdrawing them, he would seek to negotiate an agreement with Nicaragua to:

- remove any and all Cuban forces there
- ban the use of MIGs in the area
- secure an enforceable agreement on non-intervention.

Europe: Walter Mondale has pledged to keep faith with our European allies and as President he will not reduce the United States' troop commitment in Europe. He also would help America's allies preserve their access to Persian Gulf oil.

4. THE STATE & THE CITIES

Walter Mondale is a Friend of Pennsylvania and our cities

Throughout his political career, Walter Mondale has been a forceful advocate of America's cities—that's one reason why the mayors of Philadelphia, Pittsburgh, New York, Los Angeles, San Francisco, Seattle, Miami, San Antonio and many other cities have warmly endorsed Walter Mondale.



These men and women appreciate Walter Mondale's pledges to restore funding to the federal programs—Medicare, child nutrition, day care, mass transit assistance and housing aid—which have been ravaged by the Reagan budget cuts. And these urban leaders are not the professional differences between Walter Mondale and Gary Hart—especially Mondale's greater concern for minorities and the cities, and his more mature and developed leadership capacity. They know that Walter Mondale is committed to:

Fair Taxation: When it comes to the issue of tax equity, Walter Mondale would reverse the decline in corporate taxes—which is a disgrace. He favors a 15 percent minimum corporate tax and a surtax on individuals with profits of more than $1,000,000 a year. He also would reform personal income tax "indexing" to benefit only those taxpayers earning $30,000 a year or less.

Gary Hart, on the other hand, has offered, with a potentially regressive tax on consumption (sales taxes) which could cripple growth without balancing investment.

Protecting Our Environment and Natural Water, while reversing the Reagan trend of crippling the organizations through lax enforcement of our environmental laws and granting tax advantages.

Rebuilding Our National Infrastructure—the highways, bridges and waterways which are the arteries of America's economy.

TMI—ensuring that the nuclear facility at Three Mile Island is kept shut down —so that it never again threatens the people of Pennsylvania and surrounding states.

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5. GOOD IDEAS VS "NEW IDEAS"

Walter Mondale Knows the Difference



Here is a sampling of some of Senator Gary Hart's new ideas. Take a good look, Pennsylvania.

- More than $500 a year should be deducted from the individual paychecks of working men and women to be placed in government accounts—so that if they lose their jobs they can withdraw from the account to pay for retraining or further education.
- College students ought to pay interest on student loans—while they are still in college.
- A fee of $10 per barrel should be imposed on all oil imported into the U.S. The consequences? Families in the Northeast—where we must import oil to command—who heat with oil would pay at least $200 more each year in heating costs and another $200 more in gasoline costs. Prices paid by the average family for goods and services would rise by $200.
- Employers should be allowed to pay *less* than the minimum wage (55 percent) to young men and women who want jobs (under the age of 20).
- The nuclear arms "build-down", which Gary Hart co-sponsored in the Senate more than a year ago and still embraces, was designed by Republicans to undermine the nuclear freeze movement. The "build-down" would allow one new high-technology nuclear weapon to be built for every two "old" weapons destroyed.

Why Mondale will defeat Ronald Reagan in November:

- Mondale's experience and proven leadership
- Mondale's personal and political values
- Mondale's broad-based national support

Walter Mondale is the one candidate with the experience and leadership to move America in the right direction as we approach the 1990's.

What really matters in Pennsylvania in the April 26th primary—as it should in all elections—are the issues of principle, policy and character. Unlike his opponents, Walter Mondale is an experienced leader who knows himself and what he believes in. Walter Mondale is not an "overnight sensation"—he is rooted deeply in a political tradition of government which serves people.

Ask yourself which of the Democratic candidates you would rather have sitting across the table from the new Soviet leader in arms control talks?

Ask yourself which Democratic candidate would put America's full resources behind creating and preserving jobs in our smokestack basic industries such as steel and autos?

The answer is Walter Mondale. During his long career of public leadership, Mondale has worked at every level of government—from the statehouse as Minnesota Attorney General to the U.S. Senate and the White House as Vice President.

Mondale will quit blaming the government for America's problems and will start looking it to solve them.

As a major newspaper editorial writer in New York City concluded a few days ago, in the face of sudden voter interest in Gary Hart, "Walter Mondale has not ventured his radio—but continued to sail against the wind. We think he has chosen the course of principle—and that by November the issues victimized by Reaganism are constitute a landslide behind him."

VOTE • FOR

MONDALE

AT-LARGE DELEGATES

W. WILSON GOODE RICHARD S. CALIGUIRI ED RENDELL LOU TULLIO

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EXHIBIT 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. **HALPIN**
174 Doris A. **SMITH**
179 Herman **WOODEN**
184 Ann J. **LAND**
185 Arnold C. **STORR**

ALTERNATE DELEGATE

195 Dennis C. **WHITE**
197 Jeffrey D. **MORAN**
199 Leslie B. **KERNODLE**

Paid for by Second Congressional Delegates for Mondale
Andrew McNeil, Treasurer

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- ATTACHMENT K -

STATE OF VIRGINIA)
COUNTY OF FAIRFAX)

AFFIDAVIT

KNOW ALL MEN BY THESE PRESENTS:

THAT I, HOWARD L. MILLER, JR., a private investigator for 15 years and the principal of Miller and Associates, Ltd. of Falls Church, Va., being duly sworn, depose that:

1. During the course of an investigation of possible violations by organized labor of Federal Election Commission (FEC) Regulations during federal elections in Illinois, my investigators determined that the following had occurred in reference to the interrelationship of the Illinois Mondale for President Chicago Headquarters, Suite 530, 30 West Washington Street, Chicago, and the Amalgamated Clothing and Textile Workers Union Building at 333 South Ashland Avenue in Chicago.

a. An investigator who "volunteered" to work on behalf of Senator Mondale's campaign at the Chicago Headquarters office on March 6, 1984, was told by Katie Broeren, who supervised the volunteers, that volunteers were "desperately needed" in the Union operated phone bank on S. Ashland Avenue. He was instructed by Katie Broeren to contact a "Manny" or "Joe" at the Union Hall. The investigator did as he was instructed and was, in fact, put to work on the phone bank. The "Manny" or "Joe" were subsequently identified as Manny Tudeur and Joe Costigan, who were Union staff employees.

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b. While the investigator in "a" above was working on the phone bank at the Textile Workers Union on March 7th, there were only 5 or 6 people working the 15 phones when a news reporter arrived to cover the activities. The union staff employees quickly got together an additional 9 or so people to work the remaining phones and while the reporter was there, a "Helen", last name unknown but who worked in the finance office of the Union, came around as if she were supervising, but on a piece of paper she put in front of each caller was written "Say you are a Union Member".

c. On March 8, 1984, the investigator described in "a" above, went to the Chicago Mondale Headquarters to do volunteer work and he was again directed back to the Textile Workers Union Hall on S. Ashland Avenue to assist there.

d. On March 12, 1984, two other investigators went to the Mondale Chicago Headquarters at approximately 9:30 a.m. to volunteer to work on behalf of Senator Mondale's campaign. They were immediately sent to the Textile Workers Union Hall on S. Ashland Avenue, where they were asked to put self-adhesive address labels on already stuffed envelopes being sent out by the AFL-CIO.

e. On March 17, 1984, another investigator went to the Mondale Chicago Headquarters about 10:30 a.m. and volunteered to work on behalf of Senator Mondale. She met a staff person named Katherine, who may be identified with Katie Broeren, who asked her to take some Mondale pamphlets out on the street to distribute. When the investigator asked the staffer about phone

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banks, she was told that after she distributed the pamphlets that she could go to the Textile Union Hall on S. Ashland Avenue and work on the Union phone banks if she cared to, which, in fact, she did.

f. On March 19, 1984, an investigator, not mentioned above, who had volunteered to work at the Textile Union Hall, observed that college students who were sent from the Mondale Chicago Headquarters were calling other unions to find out when the workers finished work so that the student volunteers could go to the factories and pass out flyers to the voters.

g. On March 19, 1984, the investigator mentioned in "f" above, while at the Textile Union Hall, overheard a telephone conversation between "Will", not further identified, and an individual from the Mondale Chicago Headquarters urging "Will" to get the people out to vote.

WITNESS THE FOLLOWING Signature:

HOWARD L. MILLER, JR.

STATE OF VIRGINIA)
COUNTY OF FAIRFAX) To-Wit:

I, Peter R. Castillo, a Notary Public in and for the County aforesaid, in the State of Virginia, do hereby certify that Howard L. Miller, Jr., whose name is signed to the foregoing Affidavit, has personally appeared before me in my County aforesaid and sworn and acknowledged the same.

Given under my hand this 16TH day of May 1984.

Notary Public FX., VA.
SIGN IN

My Commission Expires: 17 DEC. 85



Support the Delegates Who Support Mondale

The 2nd District Mondale Slate

Norma J. White, Field Representative, Chicago Teachers Union.

Damon E. Rockett, Commissioner of Public Health and Safety, City of Harvey. Member of Board of Directors, Harvey YMCA.

Patrick C. McClurkin, Graduate of the Howard University School of Law; actively engaged in the private practice of law in the city of Chicago.

Michael A. Roman, Graduate of the DePaul University Law School; presently engaged in the private practice of law in the city of Chicago; Real Estate Broker and Notary Public. Abogado Bilingue, Notario Publico Y Realtor.

Sheila A. Rivers, Community Activist; Precinct Representative, 9th Ward Citizen's Committee; Coordinator, The Extended Arms Center for Battered Women and Children.

Catherine Poindexter, Trustee of Thornton Township; Member of Board of Directors, South Suburban Council in Aging.

Lupe Valadez, Financial Secretary, Local 65, United Steelworkers of America; Member of Board of Directors, Claretion Medical Center and South Shore Hospital.

Hermoline Saxton, President, Local 5016, Communication Workers of America.

Alternates:

Kathryn L. Battiste, Member of Chicago Teachers Union; Past Secretary, Dalton Homeowners Association.

Joseph C. Caparelli, International Brotherhood of Electrical Workers.

Barbara A. Dunn, Sales Marketing Representative, Trans World Airlines, Inc.

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On March 20th Vote for WALTER MONDALE FOR PRESIDENT

AND THE MONDALE DELEGATES

(VOTE FOR 8)

- ☐ NORMA J. WHITE (MONDALE) #54
- ☐ DAMON E. ROCKETT (MONDALE) #55
- ☐ PATRICK C. McCLURKIN (MONDALE) #56
- ☐ MICHAEL A. ROMAN (MONDALE) #57
- ☐ SHEILA A. RIVERS (MONDALE) #58
- ☐ CATHERINE POINDEXTER (MONDALE) #59
- ☐ LUPE VALADEZ (MONDALE) #60
- ☐ HERMOLINE SAXTON (MONDALE) #61

MONDALE ALTERNATES

(VOTE FOR 3)

- ☐ KATHRYN L. BATTISTE (MONDALE) #90
- ☐ JOSEPH C. CAPARELLI (MONDALE) #91
- ☐ BARBARA A. DUNN (MONDALE) #92

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 2nd District Mondale Delegate Committee

Mondale

WALTER MONDALE



THE EXPERIENCE TO KNOW WHAT WE NEED TO CHANGE... THE STRENGTH TO MAKE IT HAPPEN

ENDORSEMENT L

"America must be number one again 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 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.



NL

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Michael Sher, Esq.
Friedman & Koven
208 South LaSalle Street
Chicago, Illinois 60604

Re: MUR 1667 and 1704

Dear Mr. Sher:

This responds to your letter of June 27, 1984, wherein you requested that the Commission accept the termination of the Mondale Delegate Committees from the 3rd, 4th, 7th, 9th, 11th, 12th, 14th, 17th, 19th, 20th, 21st and 22nd Districts in Illinois. On July , 1984, the Commission considered your request and decided not to approve the requests for termination for the above mentioned delegate committees.

This decision compliments the letter dated May 16, 1984, wherein you were advised that pending matters under review, MURs 1667 and 1704 prevent approvals for termination from being granted. The existing structure and organization of established delegate committees is critical to resolving the issues involved in MURs 1667 and 1704. Pursuant to 2 U.S.C. § 437(g), the Commission is authorized to investigate a matter once a complaint has been filed. Furthermore, neither 2 U.S.C. § 433(d)(1), nor 11 C.F.R. § 102.3 expressly state that a political committee can cease its reporting activities on its own initiative. The language in the regulations is passive on this issue, and only states that "[a] political committee (other than a principal campaign committee) may terminate only upon filing a termination report." 11 C.F.R. § 102.3. (emphasis added) This language does not prevent the Commission from refusing to approve requests for termination from a political committee during the pendency of an investigation.

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NL

Accordingly, the delegate committees are required to continue their reporting obligations until further notice from the Commission. If you have any additional questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary

FROM: Office of General Counsel

DATE: July 16, 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	[x]	Other (see distribution below)	[ ]

SENSITIVE - CIRCULATE ON _____

PINK PAPER - _____

24 HOUR TALLY VOTE _____

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MRR

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 23, 1984

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

ATTENTION: STEPHEN MIMS
LAW CLERK

THROUGH: JOHN C. SURINA
STAFF DIRECTOR

FROM: JOHN D. GIBSON
ASSISTANT STAFF DIRECTOR
REPORTS ANALYSIS DIVISION

SUBJECT: UPDATE OF DELEGATE COMMITTEE INFORMATION

Attached is updated information on the back-up material sent to you June 7, 1984. Should you have any questions, please let me know.

Attachment

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AFSCME - PEOPLE
C00011114

RECIPIENT	IDENTIFICATION	AMOUNT
DC - Mondale Delegates - DC	C00182550	$ 1,000.00
FL - C.D. 2 Delegates for Mondale, FL	C00177873	$ 1,000.00
FL - C.D. 5 Delegates for Mondale	C00178707	$ 1,000.00
FL - C.D. 7 Delegates for Mondale	C00178947	$ 1,000.00
FL - Delegates for Mondale	C00178509	$ 2,000.00
FL - Mondale 16TH District Delegate Committee	C00175950	$ 2,000.00
FL - Mondale Delegates, C.D. 13	C00179440	$ 1,000.00
FL - South Florida Delegates for Mondale	C00176875	$ 5,000.00
IL - 15TH District Delegates for Mondale	C00177238	$ 1,000.00*
IL - Eleventh District Mondale Delegate Committee	C00175828	$ 1,000.00
IL - Ninth District Mondale Delegate Committee	C00176180	$ 2,000.00
IL - Third Congressional District Delegates for Mondale	C00178715	$ 2,000.00
NH - NH 1ST District Delegates for Mondale	C00176909	$ 5,000.00
NY - 6TH C.D. Delegates for Mondale	C00179887	$ 1,910.00
NY - At-Large Delegates for Mondale	C00181016	$ 5,000.00
NY - Mondale 17TH C.D. Delegate Committee	C00176883	$ 860.00
PA - 21ST Congressional 1984 Delegates for Mondale	C00179457	$ 1,500.00
PA - Delegates At-Large for Mondale	C00180679	$ 5,000.00
PA - Second Congressional District Delegates for Mondale	C00178319	$ 1,000.00
RI - 1ST and 2ND District Delegate Committee(s) for Mondale	C00177246	$ 2,500.00
RI - 1ST and 2ND District Delegate Committee(s) for Mondale	C00177808	$ 2,500.00
WI - Wisconsin At-Large Delegate Mondale Committee	C00180687	$ 5,000.00
	Chart I Sub-Total	$50,270.00

*Different Amounts Reported by PAC and Delegate Committee (Delegate Committee Amount Reflected)

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AFSCME-PEOPLE CON'T

RECIPIENT	IDENTIFICATION	AMOUNT
NY - 11TH C.D. Delegates for Mondale	C00181115	$ 510.00
NY - 9TH C.D. Delegates for Mondale	C00179895	$ 375.00
NY - 8TH C.D. Delegates for Mondale	C00180224	$ 110.00
NY - 7TH C.D. Delegates for Mondale	C00179861	$ 45.00
NY - Long Island Mondale 4TH C.D.	C00181396	$ 2,055.00
NY - North Country Delegates for Mondale (26TH C.D.)	C00181107	$ 1,210.00
NY - The Mondale Team (32ND C.D.)	Not Registered	$ 1,215.00
NY - Southern Tier Committee for Mondale (34TH C.D.)	C00182329	$ 500.00
NY - 19TH C.D. Delegate Committee for Mondale	C00182899	$ 925.00
NY - 18TH C.D. Delegate Committee for Mondale	Not Registered	$ 350.00
NY - 15TH C.D. Delegates Coalition for Mondale	Not Registered	$ 960.00
NY - 16TH C.D. Delegates for Mondale	C00181388	$ 335.00
NY - 14TH C.D. Delegates for Mondale	C00181149	$ 355.00
NY - 13TH C.D. Delegates for Mondale	C00181131	$ 15.00
NY - 12TH C.D. Delegates for Mondale	C00181123	$ 510.00
NY - Mondale 19TH C.D. Delegate Committee	C00182899	$ 300.00
NY - Mondale 18TH C.D. Delegate Committee	Not Registered	$ 50.00
NY - Mondale 17TH C.D. Delegate Committee	C00176883	$ 750.00
NY - 15TH C.D. Delegate Coalition for Mondale	Not Registered	$ 750.00
NY - 14TH C.D. Delegates for Mondale	C00181149	$ 250.00
NY - 11TH C.D. Delegates for Mondale	C00181115	$ 250.00
NY - 9TH C.D. Delegates for Mondale	C00179895	$ 250.00
NY - 8TH C.D. Delegates for Mondale	C00180224	$ 500.00
NY - 23RD C.D. Delegates Committee for Mondale	C00180588	$ 845.00
NY - Naples-Mondale for President (23RD C.D.)	C00180216	$ 715.00
NY - Delegates for Mondale 25TH C.D.	C00180414	$ 775.00
NY - Lower Hudson Delegates for Mondale (22ND C.D.)	C00180570	$ 565.00
NY - 16TH C.D. Delegates for Mondale	C00181388	$ 500.00
NY - 12TH C.D. Delegates for Mondale	C00181123	$ 250.00
NH - 2ND C.D. Delegates for Mondale	C00176891	$ 1,350.00
	Chart III Sub-Total	$17,570.00
NY - Long Island Mondale 4TH C.D.	C00181396	$ 300.00
PA - 14TH C.D. Delegates for Mondale	C00180562	$ 1,000.00
NY - 23RD C.D. Delegates Committee for Mondale	C00180588	[$ 845.00]
	7-17-84 PAC Update Sub-Total	$ 455.00
	TOTAL	$68,295.00

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UAW V-CAP
C00002840

RECIPIENT	IDENTIFICATION	AMOUNT
IL - 12TH District Mondale Delegate Committee	C00175943	$ 2,000.00
IL - 12TH District Mondale Delegate Committee	C00175943	[$675.50]
IL - 16TH Delegates for Mondale	C00178681	$ 2,000.00
IL - 17TH District Mondale Delegate Committee	C00176925	$ 2,000.00
IL - 17TH District Mondale Delegate Committee	C00176925	[$1,042.24]
IL - 19TH District Delegates for Mondale Committee	C00178673	$ 2,000.00
IL - 20TH C.D. Delegates for Mondale	C00177881	$ 2,000.00
IL - Mondale Delegates for the Illinois 18TH Committee	C00176198	$ 2,000.00
NH - NH 2ND District Delegates for Mondale	C00176891	$ 5,000.00
NY - At-Large Delegates for Mondale	C00181016	$ 5,000.00
PA - Mondale Delegates Committee	C00178137	$ 3,400.00*
PA - 4TH District Delegates for Mondale	C00179846	$ 3,500.00
PA - Delegates At-Large for Mondale	C00180679	$ 5,000.00
WI - 5TH C.D. Mondale Delegate Committee	C00181438	$ 2,500.00
	Chart I Sub-Total	$34,682.26
MI - Sixth District Delegates for Mondale	C00179697	$ 3,000.00
MO - Western Missouri Mondale Delegate Committee (Kansas City)	C00183186	$ 2,500.00
MO - Western Missouri Mondale Delegate Committee (St. Louis)	Not Registered	$ 2,500.00
NY - 16TH C.D. Delegates for Mondale Committee	C00181388	$ 5,000.00
NY - Erie County Delegates for Mondale	C00181305	$ 500.00
PA - 15TH C.D. Delegates for Mondale	Not Registered	$ 500.00
PA - 5TH C.D. Delegates for Mondale	C00181008	$ 500.00
PA - 14TH C.D. Delegates for Mondale	C00180562	$ 5,000.00
WI - Wisconsin At-Large Mondale Delegates Committee	C00180687	$ 2,500.00
	Chart III Sub-Total	$22,000.00
PA - Mondale Delegates Committee	C00178137	[$ 850.00]
	7-17-84 PAC Update Sub-Total	[$ 850.00]
	TOTAL	$55,832.26

*Different Amounts Reported By PAC and Delegate Committee (Delegate Committee Amount Reflected)

8504050436

SEIU-COPE
C00004036

	RECIPIENT	IDENTIFICATION	AMOUNT
IL -	Eleventh District Mondale Delegate Committee	C00175828	$ 1,000.00
IL -	Eleventh District Mondale Delegate Committee	C00175828	[$294.42]
MD -	Mondale Delegate At-Large Committee for Maryland	C00181974	$ 5,000.00
NY -	At-Large Delegates for Mondale	C00181016	$ 5,000.00
PA -	Delegates At-Large for Mondale	C00180679	$ 4,000.00
PA -	Mondale Delegate Committee - 12TH C.D.	C00178954	$ 1,000.00
PA -	Pennsylvania 17TH C.D. Delegates for Mondale	C00180182	$ 1,000.00
		Chart I Sub-Total	$16,705.58
MA -	6TH District Delegate for Mondale	Not Registered	$ 500.00
OH -	Ohio Mondale At-Large Delegates State Committee	Not Registered	$ 2,500.00
		Chart III Sub-Total	$ 3,000.00
OH -	Ohio Mondale At-Large Delegates State Committee	Not Registered	[$ 2,500.00]
		7-17-84 PAC Update Sub-Total	[$ 2,500.00]
		TOTAL	$17,205.58

8504043037

AFL-CIO COPE
C00003806

RECIPIENT	IDENTIFICATION	AMOUNT
DC - Mondale Delegates - DC	C00182550	$ 600.00
FL - Mondale 15TH District Delegate Committee	C00176644	$ 3,000.00
FL - Mondale Delegates C.D. 8	C00178145	$ 1,000.00
FL - South Florida Delegates for Mondale	C00176875	$ 1,000.00
IL - 19TH District Delegates for Mondale Committee	C00178673	$ 3,200.00
IL - 22ND C.D. Delegates for Mondale	C00177840	$ 3,200.00
IL - 17TH District Mondale Delegate Committee	C00176925	$ 3,200.00
IL - 17TH District Mondale Delegate Committee	C00176925	[$1,563.36]
	Chart I Sub-Total	$13,636.64
PR - Delegates Committee With Mondale	Not Registered	$ 5,000.00
	Chart III Sub-Total	$ 5,000.00
MD - Mondale Delegate At-Large Committee for Maryland	C00181974	$ 5,000.00
FL - Mondale Delegates C.D. 8	C00178145	[$ 500.00]
	7-17-84 PAC Update Sub-Total	$ 4,500.00
	TOTAL	$23,136.64

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ACTWU-COPE
C00005728

RECIPIENT	IDENTIFICATION	AMOUNT
IL - 7TH C.D. Delegates for Mondale	C00178244	$ 1,000.00
NH - NH 1ST District Delegates for Mondale	C00176909	$ 5,000.00
NY - At-Large Delegates for Mondale	C00181016	$ 2,500.00
	Chart I Sub-Total	$ 8,500.00
PA - 11th Congressional Delegates for Mondale	C00178467	$ 50.00
	7-17-84 PAC Update Sub-Total	$ 50.00
	TOTAL	$ 8,550.00

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MACHINISTS NON-PARTISAN POLITICAL LEAGUE
C00002469

RECIPIENT	IDENTIFICATION	AMOUNT
MD - Montgomery County for Mondale Delegate Committee	C00180992	$ 500.00
MD - Montgomery County for Mondale Delegate Committee	C00180992	[$500.00]
NY - At-Large Delegates for Mondale	C00181016	$ 5,000.00
PA - 14TH C.D. Delegates for Mondale	C00180562	$ 2,400.00
	CHart I Sub-Total	$ 7,400.00
NY - Northern NY Delegates for Mondale	C00180190	$ 1,000.00
	Chart III Sub-Total	$ 1,000.00
FL - C.D. 2 Delegates for Mondale	C00177873	$ 1,000.00
	7-17-84 PAC Update Sub-Total	$ 1,000.00
	TOTAL	$ 9,400.00

UNITED STEELWORKERS OF AMERICA PAC
C00003590

RECIPIENT	IDENTIFICATION	AMOUNT
IL - Delegates for Mondale Committee - 21ST C.D.	C00176933	$ 1,000.00
PA - Mondale Delegates - 20TH District	C00180737	$ 2,000.00
PA - 4TH District Delegates for Mondale	C00179846	$ 2,000.00
PA - Mondale Delegate Committee - 12TH C.D.	C00178954	$ 2,000.00
	Chart I Sub-Total	$ 7,000.00
PA - 22ND C.D. Delegate Committee for Mondale	C00180166	$ 2,000.00
MD - Second District Delegates for Mondale	C00180984	$ 2,000.00
MD - Second District Delegates for Mondale	C00180984	[$ 2,000.00]
	7-17-84 PAC Update Sub-Total	$ 2,000.00
	TOTAL	$ 9,000.00

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CARPENTERS LEGISLATIVE IMPROVEMENT COMMITTEE
C00001016

RECIPIENT	IDENTIFICATION	AMOUNT
FL - South Florida Delegates for Mondale	C00176875	$ 1,000.00
IL - 20TH C.D. Delegates for Mondale	C00177881	$ 5,000.00
	Chart I Sub-Total	$ 6,000.00
NY - 22ND C.D. Delegates for Mondale	C00180570	$ 2,000.00
NY - The Mondale Team	Not Registered	$ 1,000.00
	7-17-84 PAC Update Sub-Total	$ 3,000.00
	TOTAL	$ 9,000.00

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UPCW ACTIVE BALLOT CLUB
C00002766

RECIPIENT	IDENTIFICATION	AMOUNT
NH - NH 2ND District Delegates for Mondale	C00176891	$ 5,000.00
	Chart I Sub-Total	$ 5,000.00
VA - Mondale 2ND C.D. Delegate Recruitment Committee	Not Registered	$ 5,000.00
KY - Kentucky At-Large Mondale Committee	C00181024	$ 5,000.00
PA - At-Large Delegates for Mondale Committee	C00180679	$ 5,000.00
NY - State At-Large Delegate Committee for Mondale	C00181016	$ 5,000.00
NY - Committee for Western New York Mondale Delegates	C00180208	$ 2,000.00
	Chart III Sub-Total	$22,000.00
MD - Mondale Delegate At-Large Committee for Maryland	C00181974	$ 2,500.00
MD - 4TH District Delegates for Mondale	C00181420	$ 100.00
MD - Mondale Delegate At-Large Committee for Maryland	C00181974	[$ 2,500.00]
MD - 4TH District Delegates for Mondale	C00181420	[$ 100.00]
NY - State At-Large Delegate Committee for Mondale	C00181016	[$ 5,000.00]
	7-17-84 PAC Update Sub-Total	[$ 5,000.00]
	TOTAL	$22,000.00

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IBEW LOCAL UNION 915 PAC
C00140749

RECIPIENT	IDENTIFICATION	AMOUNT
FL - C.D. 10 Delegates for Mondale	C00178939	$ 1,000.00
FL - C.D. 7 Delegates for Mondale	C00178947	$ 1,000.00
FL - Mondale Delegates C.D. 8	C00178145	$ 1,000.00
	Chart I Sub-Total	$ 3,000.00
FL - Mondale Delegates C.D. 8	C00178145	[$ 500.00]
	7-17-84 PAC Update Sub-Total	[$ 500.00]
	TOTAL	$ 2,500.00

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0-14-56
MRR

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 23, 1984

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

ATTENTION: STEPHEN MIMS
LAW CLERK

THROUGH: JOHN C. SURINA
STAFF DIRECTOR

FROM: JOHN D. GIBSON
ASSISTANT STAFF DIRECTOR
REPORTS ANALYSIS DIVISION

SUBJECT: UPDATE OF DELEGATE COMMITTEE INFORMATION

Attached is updated information on the back-up material sent to you June 7, 1984. Should you have any questions, please let me know.

Attachment

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AFSCME - PEOPLE
C00011114

RECIPIENT	IDENTIFICATION	AMOUNT
DC - Mondale Delegates - DC	C00182550	$ 1,000.00
FL - C.D. 2 Delegates for Mondale, FL	C00177873	$ 1,000.00
FL - C.D. 5 Delegates for Mondale	C00178707	$ 1,000.00
FL - C.D. 7 Delegates for Mondale	C00178947	$ 1,000.00
FL - Delegates for Mondale	C00178509	$ 2,000.00
FL - Mondale 16TH District Delegate Committee	C00175950	$ 2,000.00
FL - Mondale Delegates, C.D. 13	C00179440	$ 1,000.00
FL - South Florida Delegates for Mondale	C00176875	$ 5,000.00
IL - 15TH District Delegates for Mondale	C00177238	$ 1,000.00*
IL - Eleventh District Mondale Delegate Committee	C00175828	$ 1,000.00
IL - Ninth District Mondale Delegate Committee	C00176180	$ 2,000.00
IL - Third Congressional District Delegates for Mondale	C00178715	$ 2,000.00
NH - NH 1ST District Delegates for Mondale	C00176909	$ 5,000.00
NY - 6TH C.D. Delegates for Mondale	C00179887	$ 1,910.00
NY - At-Large Delegates for Mondale	C00181016	$ 5,000.00
NY - Mondale 17TH C.D. Delegate Committee	C00176883	$ 860.00
PA - 21ST Congressional 1984 Delegates for Mondale	C00179457	$ 1,500.00
PA - Delegates At-Large for Mondale	C00180679	$ 5,000.00
PA - Second Congressional District Delegates for Mondale	C00178319	$ 1,000.00
RI - 1ST and 2ND District Delegate Committee(s) for Mondale	C00177246	$ 2,500.00
RI - 1ST and 2ND District Delegate Committee(s) for Mondale	C00177808	$ 2,500.00
WI - Wisconsin At-Large Delegate Mondale Committee	C00180687	$ 5,000.00
	Chart I Sub-Total	$50,270.00

*Different Amounts Reported by PAC and Delegate Committee (Delegate Committee Amount Reflected)

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AFSCME-PEOPLE [redacted]'T[redacted]

RECIPIENT	IDENTIFICATION	AMOUNT
NY - 11TH C.D. Delegates for Mondale	C00181115	$ 510.00
NY - 9TH C.D. Delegates for Mondale	C00179895	$ 375.00
NY - 8TH C.D. Delegates for Mondale	C00180224	$ 110.00
NY - 7TH C.D. Delegates for Mondale	C00179861	$ 45.00
NY - Long Island Mondale 4TH C.D.	C00181396	$ 2,055.00
NY - North Country Delegates for Mondale (26TH C.D.)	C00181107	$ 1,210.00
NY - The Mondale Team (32ND C.D.)	Not Registered	$ 1,215.00
NY - Southern Tier Committee for Mondale (34TH C.D.)	C00182329	$ 500.00
NY - 19TH C.D. Delegate Committee for Mondale	C00182899	$ 925.00
NY - 18TH C.D. Delegate Committee for Mondale	Not Registered	$ 350.00
NY - 15TH C.D. Delegates Coalition for Mondale	Not Registered	$ 960.00
NY - 16TH C.D. Delegates for Mondale	C00181388	$ 335.00
NY - 14TH C.D. Delegates for Mondale	C00181149	$ 355.00
NY - 13TH C.D. Delegates for Mondale	C00181131	$ 15.00
NY - 12TH C.D. Delegates for Mondale	C00181123	$ 510.00
NY - Mondale 19TH C.D. Delegate Committee	C00182899	$ 300.00
NY - Mondale 18TH C.D. Delegate Committee	Not Registered	$ 50.00
NY - Mondale 17TH C.D. Delegate Committee	C00176883	$ 750.00
NY - 15TH C.D. Delegate Coalition for Mondale	Not Registered	$ 750.00
NY - 14TH C.D. Delegates for Mondale	C00181149	$ 250.00
NY - 11TH C.D. Delegates for Mondale	C00181115	$ 250.00
NY - 9TH C.D. Delegates for Mondale	C00179895	$ 250.00
NY - 8TH C.D. Delegates for Mondale	C00180224	$ 500.00
NY - 23RD C.D. Delegates Committee for Mondale	C00180588	$ 845.00
NY - Naples-Mondale for President (23RD C.D.)	C00180216	$ 715.00
NY - Delegates for Mondale 25TH C.D.	C00180414	$ 775.00
NY - Lower Hudson Delegates for Mondale (22ND C.D.)	C00180570	$ 565.00
NY - 16TH C.D. Delegates for Mondale	C00181388	$ 500.00
NY - 12TH C.D. Delegates for Mondale	C00181123	$ 250.00
NH - 2ND C.D. Delegates for Mondale	C00176891	$ 1,350.00
	Chart III Sub-Total	$17,570.00
NY - Long Island Mondale 4TH C.D.	C00181396	$ 300.00
PA - 14TH C.D. Delegates for Mondale	C00180562	$ 1,000.00
NY - 23RD C.D. Delegates Committee for Mondale	C00180588	[$ 845.00]
	7-17-84 PAC Update Sub-Total	$ 455.00
	TOTAL	$68,295.00

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UAW V-CAP
C00002840

RECIPIENT	IDENTIFICATION	AMOUNT
IL - 12TH District Mondale Delegate Committee	C00175943	$ 2,000.00
IL - 12TH District Mondale Delegate Committee	C00175943	[$675.50]
IL - 16TH Delegates for Mondale	C00178681	$ 2,000.00
IL - 17TH District Mondale Delegate Committee	C00176925	$ 2,000.00
IL - 17TH District Mondale Delegate Committee	C00176925	[$1,042.24]
IL - 19TH District Delegates for Mondale Committee	C00178673	$ 2,000.00
IL - 20TH C.D. Delegates for Mondale	C00177881	$ 2,000.00
IL - Mondale Delegates for the Illinois 18TH Committee	C00176198	$ 2,000.00
NH - NH 2ND District Delegates for Mondale	C00176891	$ 5,000.00
NY - At-Large Delegates for Mondale	C00181016	$ 5,000.00
PA - Mondale Delegates Committee	C00178137	$ 3,400.00*
PA - 4TH District Delegates for Mondale	C00179846	$ 3,500.00
PA - Delegates At-Large for Mondale	C00180679	$ 5,000.00
WI - 5TH C.D. Mondale Delegate Committee	C00181438	$ 2,500.00
	Chart I Sub-Total	$34,682.26
MI - Sixth District Delegates for Mondale	C00179697	$ 3,000.00
MO - Western Missouri Mondale Delegate Committee (Kansas City)	C00183186	$ 2,500.00
MO - Western Missouri Mondale Delegate Committee (St. Louis)	Not Registered	$ 2,500.00
NY - 16TH C.D. Delegates for Mondale Committee	C00181388	$ 5,000.00
NY - Erie County Delegates for Mondale	C00181305	$ 500.00
PA - 15TH C.D. Delegates for Mondale	Not Registered	$ 500.00
PA - 5TH C.D. Delegates for Mondale	C00181008	$ 500.00
PA - 14TH C.D. Delegates for Mondale	C00180562	$ 5,000.00
WI - Wisconsin At-Large Mondale Delegates Committee	C00180687	$ 2,500.00
	Chart III Sub-Total	$22,000.00
PA - Mondale Delegates Committee	C00178137	[$ 850.00]
	7-17-84 PAC Update Sub-Total	[$ 850.00]
	TOTAL	$55,832.26

*Different Amounts Reported By PAC and Delegate Committee (Delegate Committee Amount Reflected)

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SEIU-COPE
C00004036

RECIPIENT	IDENTIFICATION	AMOUNT
IL - Eleventh District Mondale Delegate Committee	C00175828	$ 1,000.00
IL - Eleventh District Mondale Delegate Committee	C00175828	[$294.42]
MD - Mondale Delegate At-Large Committee for Maryland	C00181974	$ 5,000.00
NY - At-Large Delegates for Mondale	C00181016	$ 5,000.00
PA - Delegates At-Large for Mondale	C00180679	$ 4,000.00
PA - Mondale Delegate Committee - 12TH C.D.	C00178954	$ 1,000.00
PA - Pennsylvania 17TH C.D. Delegates for Mondale	C00180182	$ 1,000.00
	Chart I Sub-Total	$16,705.58
MA - 6TH District Delegate for Mondale	Not Registered	$ 500.00
OH - Ohio Mondale At-Large Delegates State Committee	Not Registered	$ 2,500.00
	Chart III Sub-Total	$ 3,000.00
OH - Ohio Mondale At-Large Delegates State Committee	Not Registered	[$ 2,500.00]
	7-17-84 PAC Update Sub-Total	[$ 2,500.00]
	TOTAL	$17,205.58

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AFL-CIO COPE
C00003806

RECIPIENT	IDENTIFICATION	AMOUNT
DC - Mondale Delegates - DC	C00182550	$ 600.00
FL - Mondale 15TH District Delegate Committee	C00176644	$ 3,000.00
FL - Mondale Delegates C.D. 8	C00178145	$ 1,000.00
FL - South Florida Delegates for Mondale	C00176875	$ 1,000.00
IL - 19TH District Delegates for Mondale Committee	C00178673	$ 3,200.00
IL - 22ND C.D. Delegates for Mondale	C00177840	$ 3,200.00
IL - 17TH District Mondale Delegate Committee	C00176925	$ 3,200.00
IL - 17TH District Mondale Delegate Committee	C00176925	[$1,563.36]
	Chart I Sub-Total	$13,636.64
PR - Delegates Committee With Mondale	Not Registered	$ 5,000.00
	Chart III Sub-Total	$ 5,000.00
MD - Mondale Delegate At-Large Committee for Maryland	C00181974	$ 5,000.00
FL - Mondale Delegates C.D. 8	C00178145	[$ 500.00]
	7-17-84 PAC Update Sub-Total	$ 4,500.00
	TOTAL	$23,136.64

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ACTWU-COPE
C00005728

RECIPIENT	IDENTIFICATION	AMOUNT
IL - 7TH C.D. Delegates for Mondale	C00178244	$ 1,000.00
NH - NH 1ST District Delegates for Mondale	C00176909	$ 5,000.00
NY - At-Large Delegates for Mondale	C00181016	$ 2,500.00
	Chart I Sub-Total	$ 8,500.00
PA - 11th Congressional Delegates for Mondale	C00178467	$ 50.00
	7-17-84 PAC Update Sub-Total	$ 50.00
	TOTAL	$ 8,550.00

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MACHINISTS NON-PARTISAN POLITICAL LEAGUE
C00002469

RECIPIENT	IDENTIFICATION	AMOUNT
MD - Montgomery County for Mondale Delegate Committee	C00180992	$ 500.00
MD - Montgomery County for Mondale Delegate Committee	C00180992	[$500.00]
NY - At-Large Delegates for Mondale	C00181016	$ 5,000.00
PA - 14TH C.D. Delegates for Mondale	C00180562	$ 2,400.00
CHart I Sub-Total		$ 7,400.00
NY - Northern NY Delegates for Mondale	C00180190	$ 1,000.00
Chart III Sub-Total		$ 1,000.00
FL - C.D. 2 Delegates for Mondale	C00177873	$ 1,000.00
7-17-84 PAC Update Sub-Total		$ 1,000.00
TOTAL		$ 9,400.00

UNITED STEELWORKERS OF AMERICA PAC
C00003590

RECIPIENT	IDENTIFICATION	AMOUNT
IL - Delegates for Mondale Committee - 21ST C.D.	C00176933	$ 1,000.00
PA - Mondale Delegates - 20TH District	C00180737	$ 2,000.00
PA - 4TH District Delegates for Mondale	C00179846	$ 2,000.00
PA - Mondale Delegate Committee - 12TH C.D.	C00178954	$ 2,000.00
Chart I Sub-Total		$ 7,000.00
PA - 22ND C.D. Delegate Committee for Mondale	C00180166	$ 2,000.00
MD - Second District Delegates for Mondale	C00180984	$ 2,000.00
MD - Second District Delegates for Mondale	C00180984	[$ 2,000.00]
7-17-84 PAC Update Sub-Total		$ 2,000.00
TOTAL		$ 9,000.00

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CARPENTERS LEGISLATIVE IMPROVEMENT COMMITTEE
C00001016

RECIPIENT	IDENTIFICATION	AMOUNT
FL - South Florida Delegates for Mondale	C00176875	$ 1,000.00
IL - 20TH C.D. Delegates for Mondale	C00177881	$ 5,000.00
	Chart I Sub-Total	$ 6,000.00
NY - 22ND C.D. Delegates for Mondale	C00180570	$ 2,000.00
NY - The Mondale Team	Not Registered	$ 1,000.00
	7-17-84 PAC Update Sub-Total	$ 3,000.00
	TOTAL	$ 9,000.00

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UFCW ACTIVE BALLOT CLUB
C00002766

RECIPIENT	IDENTIFICATION	AMOUNT
NH - NH 2ND District Delegates for Mondale	C00176891	$ 5,000.00
	Chart I Sub-Total	$ 5,000.00
VA - Mondale 2ND C.D. Delegate Recruitment Committee	Not Registered	$ 5,000.00
KY - Kentucky At-Large Mondale Committee	C00181024	$ 5,000.00
PA - At-Large Delegates for Mondale Committee	C00180679	$ 5,000.00
NY - State At-Large Delegate Committee for Mondale	C00181016	$ 5,000.00
NY - Committee for Western New York Mondale Delegates	C00180208	$ 2,000.00
	Chart III Sub-Total	$22,000.00
MD - Mondale Delegate At-Large Committee for Maryland	C00181974	$ 2,500.00
MD - 4TH District Delegates for Mondale	C00181420	$ 100.00
MD - Mondale Delegate At-Large Committee for Maryland	C00181974	[$ 2,500.00]
MD - 4TH District Delegates for Mondale	C00181420	[$ 100.00]
NY - State At-Large Delegate Committee for Mondale	C00181016	[$ 5,000.00]
	7-17-84 PAC Update Sub-Total	[$ 5,000.00]
	TOTAL	$22,000.00

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IBEW LOCAL UNION 915 PAC
C00140749

RECIPIENT	IDENTIFICATION	AMOUNT
FL - C.D. 10 Delegates for Mondale	C00178939	$ 1,000.00
FL - C.D. 7 Delegates for Mondale	C00178947	$ 1,000.00
FL - Mondale Delegates C.D. 8	C00178145	$ 1,000.00
	Chart I Sub-Total	$ 3,000.00
FL - Mondale Delegates C.D. 8	C00178145	[$ 500.00]
	7-17-84 PAC Update Sub-Total	[$ 500.00]
	TOTAL	$ 2,500.00

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RECEIVED AT THE FEC
HAND DELIVERED
84 MAY 18 P3:

BEFORE THE
FEDERAL ELECTION COMMISSION

THE NATIONAL RIGHT TO WORK COMMITTEE) MUR 1704
)
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,)
)

8504043

and)
)
UNITED MINE WORKERS OF AMERICA)
COAL MINERS PAC,)
)
Respondents.)
)

COMPLAINT

Complainants, The National Right to Work Committee (the "Committee") and Ralph Martin (Bud) Hettinga, Jr., request an investigation of the matters alleged herein pursuant to 2 U.S.C. § 437g. The Committee's address is 8001 Braddock Road, Suite 500, Springfield, Virginia 22160, and its phone number is 703-321-9820. Mr. Hettinga's address is 645 Compress Road, Las Cruces, New Mexico 88001, and his phone number is 505-524-3551.

Respondents are Walter F. Mondale and Mondale for President Campaign Committee, 2201 Wisconsin Avenue, N.W., Washington, D.C. 20007, AFL-CIO COPE Political Contribution Committee, 815 16th Street, N.W., Washington, D.C. 20006, AFSCME Public Employees Organized to Promote Legislative Equality QUALIFIED, 1625 L Street, N.W., Washington, D.C. 20036, American Federation of Teachers COPE, 11 Dupont Circle, N.W., Washington, D.C. 20036, United Food and Commercial Workers Active Ballot Club, 1775 K Street, N.W., Washington, D.C. 20006, International Union of Bricklayers and Allied Craftsmen PAC, 815 15th Street, N.W., Washington, D.C. 20005, Carpenters Legislative Improvement Committee, 101 Constitution Avenue, N.W., Washington, D.C. 20001, Ironworkers Political Action League, 1750 New York Avenue, N.W.,

Washington, D.C. 20006, Machinists Non-Partisan Political League, 1300 Connecticut Avenue, N.W., Washington, D.C. 20036, Amalgamated Clothing and Textile Workers Union PAC, 15 Union Square, New York, N.Y. 10003, CWA-COPE PCC, 1925 K Street, N.W., Washington, D.C. 20006, Service Employees International Union COPE PCC, 2020 K Street, N.W., Washington, D.C. 20006, UAW V CAP, 8000 East Jefferson, Detroit, MI 48214, and United Mine Workers of America Coal Miners PAC, 900 15th Street, N.W., Washington, D.C. 20005.

This Complaint, filed on information and belief, is based on affidavits of private investigators and reports which have appeared in the media, which are attached hereto and incorporated herein by reference, as well as on FEC reports and on information discovered by William A. Wilson, an officer of the Committee.

Respondents have engaged in a concerted effort to circumvent the contribution limitations established by Congress in the Federal Election Campaign Act, as amended, by funneling excessive contributions through Mondale "delegate committees" which, in actuality, have been branch offices of the Mondale campaign. The evidence shows that Mondale campaign officials helped establish the "delegate committees" and selected the delegates, that Mondale campaign workers staffed the "delegate committees", and that the Mondale campaign controls the "delegate committees", all of which establish that the Mondale campaign and his "dele-

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gate committees" are and have been affiliated within the meaning of 11 C.F.R. § 100.5(g) and, therefore, are and have been subject to a single limit on the receipt of contributions.

The evidence further demonstrates that Respondent union PACs have coordinated their efforts to support Mondale's "delegate committees" and have engaged in similar patterns of contributions to the "delegate committees", which establish that the union PACs are and have been affiliated within the meaning of 11 C.F.R. § 100.5(g). All of the Respondent union PACs, taken together, therefore, are and have been subject to a single limit on contributions made to Mondale and his "delegate committees". Alternatively, and at a minimum, each Respondent union PAC, individually, is and has been subject to a single limit on contributions to Mondale and his "delegate committees". Nonetheless, each Respondent union PAC has contributed more than $5,000 to the Mondale "delegate committees", in violation of the contribution limits set by the Act.

Press reports carried the first indications that Mondale's "delegate committees" were not truly autonomous, as demonstrated by the following: (1) "Mondale's Cute Trick on Finances," Baltimore Sun (4/15/84); (2) "Mondale Says PAC Aid to Delegates Ebbing," The Washington Post (4/24/84); (3) "Committees for Mondale Share Money and Staff," The Washington Post (4/25/84); (4) "Jackson Assails PAC Ties," The Washington Post (4/25/84); (5) "Democrat Reformers PAC It In," The Washington Times (4/25/84); (6) "Mondale Directs Disputed Groups to End

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Operation," The New York Times (4/26/84); (7) "The More Mondale Flails, the Deeper He Gets Into PAC Mess," The Washington Post (4/26/84); (8) "Mondale PACs It In," Richmond Times Dispatch (4/27/84); (9) "Mondale Agrees to Return Disputed Funds," The Washington Post (4/28/84); (10) "How PAC-Man Pulled It Off," Richmond Times-Dispatch (4/28/84); and (11) "Mr. Mondale Un PACs," The New York Times (4/29/84). (Attachments A-1 through A-17.)

These news accounts reflect, among other things, that Mondale staff instructed the "delegate committees" on how to organize and operate; that Mondale staff were transferred to the "delegate committees"; that "delegate committees" took the place of the national Mondale committee (in Pennsylvania); that Mondale reacted to criticism of the "delegate committee" operation by writing a letter urging them not to accept PAC contributions -- and PAC contributions stopped; that Mondale's Office of the Legal Counsel was made available to advise the "delegate committees"; that the head of the Mondale Delegates D.C. Committee admitted that the "delegate committee" was organized with assistance from the Mondale national campaign office and was the principal finance committee for Mondale in the District of Columbia; that funds were transferred from a "delegate committee" in one state to a sister group in another; that some registration statements for different "delegate committees" were written by the same person and mailed in envelopes apparently typed on the same

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typewriter, while also reporting joint spending at the same print shops; and that "delegate committees" started disbanding after Mondale gave orders to do so.

The coordination and control reflected in these news reports is confirmed by the reports of private investigators appended hereto as Attachments B through K. According to the investigative reports, paid Mondale staff (identified by a gold pin in the shape of a map of Pennsylvania with the imprinted name of "Mondale") were coordinating operations at the Philadelphia, Pennsylvania, Mondale At-Large Delegate Committee offices, as well as at the Upper Darby, Pennsylvania, Democratic Party office. These personnel were observed moving between the "delegate committee" office and Mondale's traveling headquarters which was located in an adjacent hotel, the Bellevue Stratford. Some of them even stayed at the Bellevue Stratford. Some of these personnel were to go to other locations after the Pennsylvania primary (Washington, Texas and California). In the same "delegate committee" office, campaign material from the Oklahoma and Illinois races was found, as well as material from the Pennsylvania Second Congressional Delegates for Mondale committee, the Pennsylvania AFL-CIO COPE, the national AFL-CIO COPE, and Mondale for President. Some of the staff referred to their paychecks as "Mondale paychecks." The president of the Delaware County Pennsylvania AFL-CIO Council appears to have visited the Upper Darby Democratic Party office to confer with Mondale campaign staffers.

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In addition, many union-PAC contributions to the "delegate committees" appear to have been coordinated. The following is a schedule of certain contributions, taken from FEC filings:

AFL-CIO COPE

Recipient	Date	Amount
Mondale 15th District Delegate Committee -- Ft. Lauderdale, FL	3/9/84	3,000
South Florida Delegates for Mondale -- Miami, FL	3/9/84	1,000
Mondale Delegates Congressional District Eight -- Clearwater, FL	3/9/84	1,000
Delegates Committee with Mondale -- San Juan, PR	3/12/84	5,000
19th District Mondale Delegate Committee -- Charleston, IL	3/15/84	3,200
17th District Mondale Delegate Committee -- Rock Island, IL	3/15/84	3,200
22nd District Mondale Delegate Committee -- Cobden, IL	3/15/84	3,200
Mondale Delegates D.C. -- Washington, D.C.	3/16/84	600
		$20,200

AFSCME PUBLIC EMPLOYEES ORGANIZED TO PROMOTE LEGISLATIVE EQUALITY QUALIFIED

Recipient	Date	Amount
Mondale Delegates Congressional District Thirteen -- Naples, FL	2/22/84	1,000
Congressional District Five Delegates for Mondale -- Orlando, FL	2/22/84	1,000

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Congressional District Two Delegates for Mondale -- Tallahassee, FL	2/22/84	1,000
Eleventh Congressional District Mondale Delegate Committee -- Chicago, IL	2/29/84	1,000
Ninth Congressional District Mondale Delegate Committee -- Evanston, IL	2/17/84	2,000
Third Congressional District Mondale Delegate Committee -- Oak Lawn, IL	2/17/84	2,000
First District Delegates for Mondale -- Merrimack, NH	2/10/84	5,000
15th District Delegates for Mondale -- Lincoln, IL	2/10/84	5,000
First Congressional District Mondale Delegate Committee -- N. Providence, R.I.	3/12/84	2,500
Mondale 16th District Delegate Committee -- Ft. Lauderdale, FL	3/12/84	2,000
Delegates for Mondale 3rd Cong. District -- Jacksonville, FL	3/12/84	2,000
Second Cong. District Mondale Delegate Committee -- N. Providence, R.I.	3/12/84	2,500
Mondale Delegates -- D.C. Washington, D.C.	3/7/84	1,000
South Florida Delegates for Mondale -- Miami, FL	3/7/84	5,000
Congressional District Seven Delegates for Mondale -- Tampa, FL	3/1/84	1,000
11th C.D. Delegates for Mondale -- Brooklyn, N.Y.	3/23/84	510

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9th C.D. Delegates for Mondale -- Kew Gardens, N.Y.	3/23/84	375
8th C.D. Delegates for Mondale -- Bayside, N.Y.	3/23/84	110
7th C.D. Delegates for Mondale -- Briarwood, N.Y.	3/23/84	45
6th C.D. Delegates for Mondale -- Rockaway Beach, N.Y.	3/23/84	1,410
Long Island Mondale 4th C.D. -- Garden City, N.Y.	3/23/84	2,055
North County Delegates for Mondale -- Gloversville, N.Y.	3/23/84	1,210
The Mondale Team -- N. Tonawanda, N.Y.	3/23/84	1,215
Southern Tier Committee for Mondale -- Olean, N.Y.	3/23/84	500
6th C.D. Delegates for Mondale -- Far Rockaway, N.Y.	3/23/84	500
19th C.D. Delegate Committee for Mondale -- Bronx, N.Y.	3/23/84	925
18th C.D. Delegates Committee for Mondale -- Bronx, N.Y.	3/23/84	350
15th C.D. Delegates Coalition for Mondale -- New York, N.Y.	3/23/84	960
17th C.D. Mondale Delegate Committee -- Brooklyn, N.Y.	3/23/84	860
16th C.D. Delegates for Mondale -- New York, N.Y.	3/23/84	335
14th C.D. Delegates for Mondale -- Staten Island, N.Y.	3/23/84	355
13th C.D. Delegates for Mondale -- Brooklyn, N.Y.	3/23/84	15
12th C.D. Delegates for Mondale -- Brooklyn, N.Y.	3/23/84	510

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Mondale 19th C.D. Delegate Committee -- Bronx, N.Y.	3/23/84	300
Mondale 18th C.D. Delegate Committee -- Bronx, N.Y.	3/23/84	50
Mondale 17th C.D. Delegate Committee -- New York, N.Y.	3/23/84	750
15th C.D. Delegate Coalition for Mondale -- New York, N.Y.	3/23/84	750
Delegates for Mondale - 14th C.D. -- Staten Island, N.Y.	3/23/84	250
At-Large Delegate Committee for Mondale -- New York, N.Y.	3/23/84	5,000
Delegates for Mondale 11th C.D. -- Brooklyn, N.Y.	3/23/84	250
9th C.D. Delegates for Mondale -- Kew Gardens, N.Y.	3/23/84	250
8th C.D. Delegates for Mondale -- Bayside, N.Y.	3/23/84	500
23rd Congressional Dist. Delegates Committee for Mondale -- Albany, N.Y.	3/23/84	845
Naples - Mondale for President Slate -- Clifton Park, N.Y.	3/23/84	715
Delegates for Mondale 25th C.D. -- New Hartford, N.Y.	3/23/84	775
Lower Hudson Delegates for Mondale -- Mt. Vernon, N.Y.	3/23/84	565
New Hampshire 2nd Congressional District Delegates for Mondale -- Allentown, N.H.	3/23/84	1,350
2nd C.D. Delegates for Mondale -- Philadelphia, PA	3/24/84	1,000
21st Mondale Delegate Committee -- Erie, PA	3/23/84	1,500
23rd C.D. Mondale Delegates -- Oil City, PA	3/23/84	1,000

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Wisconsin At-Large Delegate Committee -- Madison, WI	3/24/84	5,000
Pennsylvania At-Large Delegates for Mondale -- Philadelphia, PA	3/23/84	5,000
16th C.D. Delegates for Mondale -- New York, N.Y.	3/23/84	500
Delegates for Mondale - 12th C.D. -- Brooklyn, N.Y.	3/23/84	250
TOTAL:		$72,840

AMERICAN FEDERATION OF TEACHERS COPE

Recipient	Date	Amount
Mondale Delegates D.C. -- Washington, D.C.	3/19/84	500
Delegates for Mondale 3rd Congressional District -- Jacksonville, FL	2/13/84	2,000
Congressional District 6 Delegates for Mondale -- Ocala, FL	2/16/84	500
Congressional District 9 Delegates for Mondale -- Land O'Lakes, FL	2/17/84	2,000
Fourth Congressional District Mondale Delegates Committee -- New Lenox, IL	3/2/84	1,000
Seventh Congressional District Mondale Delegates Committee -- Chicago, IL	3/16/84	1,500
Montana At-large Delegates for Mondale Committee -- Helena, MT	3/21/84	1,000
New Hampshire First District Delegates for Mondale -- Merrimack, N.H.	2/9/84	5,000

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Long Island Mondale First Congressional District Delegates -- Setauket, N.Y.	3/22/84	2,000
Naples Mondale for President Slate - 24th Congressional Dist. -- Clifton Park, N.Y.	3/22/84	1,300
New York State At-large Delegates Committee for Mondale -- New York, N.Y.	3/22/84	5,000
7th Congressional District Delegates for Mondale -- Briarwood, N.Y.	3/23/84	500
9th Congressional District Delegates for Mondale -- Kew Gardens, N.Y.	3/23/84	250
10th Congressional District Delegates for Mondale -- Brooklyn, N.Y.	3/23/84	500
Delegates for Mondale - 12th Congressional District -- Brooklyn, N.Y.	3/23/84	250
Delegates for Mondale - 11th Congressional District -- Brooklyn, N.Y.	3/23/84	250
Delegates for Mondale - 14th Congressional District -- Staten Island, N.Y.	3/23/84	250
15th Congressional District Delegates Coalition for Mondale -- New York, N.Y.	3/23/84	750
Mondale 17th Congressional District Delegates Committee -- New York, N.Y.	3/23/84	750
Mondale 19th Congressional District Delegates Committee -- Bronx, N.Y.	3/23/84	300
28th Congressional District Delegates for Mondale -- Ithaca, N.Y.	3/22/84	2,000

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West New York Elect Mondale Committee - 31st Congressional District -- Williamsville, N.Y.	3/22/84	3,000
Mondale Team - 32nd Congressional District -- North Tonawanda, N.Y.	3/22/84	3,000
Southern Tier Committee for Mondale - 34th Congressional District -- Olean, N.Y.	3/22/84	1,500
Pennsylvania At-large Delegates for Mondale Committee -- Philadelphia, PA	3/21/84	5,000
Second Congressional District Delegates for Mondale Committee -- Philadelphia, PA	3/21/84	500
Third Congressional District Delegates for Mondale Committee -- Philadelphia, PA	3/21/84	1,500
Tenth Congressional District Delegates for Mondale Committee -- Scranton, PA	3/21/84	1,000
Fourteenth Congressional District Delegates for Mondale Committee -- Pittsburgh, PA	3/21/84	2,000
Congressional District 11 Delegates for Mondale -- Rockledge, FL	2/27/84	500
Northern Congressional District 12 Delegates for Mondale -- St. Lucie, FL	2/27/84	500
14th Congressional District Delegates for Mondale -- Lake Worth, FL	2/16/84	500
Mondale 15th District Delegate Committee -- Ft. Lauderdale, FL	2/16/84	1,500
South Florida Delegates for Mondale -- Miami, FL	2/21/84	2,000
Delegates for Mondale Committee (Sixth Congressional District) -- Elmhurst, IL	2/15/84	1,000

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Delegates for Mondale Committee (First Congressional District) -- Chicago, IL	2/15/84	1,000
Delegates for Mondale Committee (Second Congressional District) -- Chicago, IL	2/15/84	1,000
Delegates for Mondale Committee (Third Congressional District) -- Oak Lawn, IL	2/15/84	1,000
TOTAL:		$54,100

UNITED FOOD & COMMERCIAL WORKERS ACTIVE BALLOT CLUB

Recipient	Date	Amount
Mondale 2nd C.D. Delegate Recruitment Committee -- Virginia Beach, VA	3/20/84	5,000
Kentucky At-Large Mondale Committee -- Lexington, KY	3/21/83	5,000
Pennsylvania At-Large Delegates for Mondale Committee -- Philadelphia, PA	3/22/84	5,000
New York State At-Large Delegate Committee for Mondale -- New York, N.Y.	3/23/84	5,000
Committee for Western New York Mondale Delegates -- Rochester, N.Y.	3/23/84	2,000
New Hampshire 2nd District Delegates for Mondale -- Allenstown, N.H.	2/23/84	5,000
TOTAL:		$27,000

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INTERNATIONAL UNION OF BRICKLAYERS AND ALLIED CRAFTSMEN PAC

Recipient	Date	Amount
New Hampshire First District Delegates for Mondale -- Merrimack, N.H.	2/9/84	5,000
Illinois 7th District Mondale Delegate Committee -- Chicago, IL	3/1/84	500
Pennsylvania 18th Cong. District Delegates for Mondale -- Pittsburgh, PA	3/21/84	3,000
Pennsylvania At-Large Delegates for Mondale -- Philadelphia, PA	3/21/84	2,000
TOTAL:		$10,500

CARPENTERS LEGISLATIVE IMPROVEMENT COMMITTEE

Recipient	Date	Amount
20th District Delegates for Mondale -- Decatur, IL	2/29/84	5,000
South Florida Delegates for Mondale -- Miami, FL	3/15/84	1,000
Committee for Western New York Democratic Delegates -- Rochester, N.Y.	3/20/84	2,000
22nd Congressional District Delegates for Mondale -- New City, N.Y.	3/29/84	2,000
Mondale's Team -- N. Tonawanda, N.Y.	3/29/84	1,000
TOTAL:		$11,000

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IRONWORKERS POLITICAL ACTION LEAGUE

Recipient	Date	Amount
3rd C.D. of Illinois Mondale Delegate Committee -- Oak Lawn, IL	3/14/84	5,000
New York State At-Large Delegate Committee Mondale -- New York, N.Y.	3/28/84	1,000
New York State At-Large Delegate Committee Mondale -- New York, N.Y.	3/28/84	1,000
New York State At-Large Delegate Committee Mondale -- New York, N.Y.	3/28/84	1,000
New York State At-Large Delegate Committee Mondale -- New York, N.Y.	3/28/84	1,000
New York State At-Large Delegate Committee Mondale -- New York, N.Y.	3/28/84	1,000
Pennsylvania At-Large Delegates for Mondale -- Philadelphia, PA	3/28/84	2,000
Pennsylvania At-Large Delegates for Mondale -- Philadelphia, PA	3/28/84	1,000
Pennsylvania At-Large Delegates for Mondale -- Philadelphia, PA	3/28/84	1,000
Pennsylvania At-Large Delegates for Mondale -- Philadelphia, PA	3/28/84	1,000
TOTAL:		$15,000

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MACHINISTS NON-PARTISAN POLITICAL LEAGUE

Recipient	Date	Amount
Philadelphia Democratic County Exec. Cmtee.* -- Philadelphia, PA	3/23/84	5,000
N.Y. At-Large Delegate Committee for Mondale -- New York, NY	3/23/84	5,000
14th C.D. Delegates for Mondale -- Pittsburgh, PA	3/23/84	2,500
Montgomery County Mondale Delegate Committee -- Rockville, MD	3/23/84	500
Northern N.Y. Delegates for Mondale -- Lake Clear, NY	3/26/84	1,000
TOTAL:		$14,000

*Designated to Mondale Delegate Slate

AMALGAMATED CLOTHING AND TEXTILE WORKERS UNION PAC

Recipient	Date	Amount
New Hampshire First District Delegates for Mondale -- Merrimack, N.H.	2/16/84	5,000
Illinois 7th Congressional District Delegates for Mondale -- Chicago, IL	3/8/84	1,000
The Committee for Western New York Democratic Delegates -- Rochester, N.Y.	3/20/84	1,000
The Committee for Western New York Democratic Delegates -- Rochester, N.Y.	3/23/84	1,000
New York State At-Large Delegate Committee for Mondale -- New York, N.Y.	3/23/84	2,500

* 7th Congressional District Delegates for Mondale Committee -- Chicago, IL	3/14/84	4,000
TOTAL:		$14,500

*Chicago and Central States affiliate.

CWA COPE PCC

Recipient	Date	Amount
New Hampshire 2nd District Delegates for Mondale -- Allentown, NH	2/10/84	5,000
Long Island Mondale Delegate Committee -- Mantaugh, N.Y.	3/20/84	2,500
The Mondale Team -- N. Tonawanda, N.Y.	3/26/84	500
2nd Congressional District Candidate Mondale Committee -- Chicago, IL	3/2/84	1,000
S. Florida Delegates for Mondale -- Miami, FL	3/5/84	1,000
5th Congressional District for Mondale -- Orlando, FL	3/5/84	1,000
Delegates for Mondale 3rd C.D. -- Jacksonville, FL	3/8/84	1,000
Wisconsin At-large Mondale Delegate -- Madison, WI	3/21/84	5,000
Wisconsin 5th C.D. Mondale Delegate Committee -- Milwaukee, WI	3/21/84	5,000
New York State At-large Delegate Committee -- New York, NY	3/23/84	5,000
Pennsylvania At-large Delegates for Mondale -- Philadelphia, PA	3/23/84	5,000
TOTAL:		$32,000

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SERVICE EMPLOYEES INTERNATIONAL UNION COPE PCC

Recipient	Date	Amount
11th District Mondale Delegate Committee -- Chicago, IL	2/24/84	1,000
6th District Delegates for Mondale -- Marble Head, MA	3/5/84	500
Mondale Delegate Committee 12th C.D. -- Apollo, PA	3/19/84	1,000
New York State At-large Delegate Committee for Mondale -- New York, NY	3/22/84	5,000
Pennsylvania 17th C.D. Delegates for Mondale Committee -- Harrisburg, PA	3/26/84	1,000
Pennsylvania At-large Delegates for Mondale -- Philadelphia, PA	3/22/84	4,000
TOTAL:		$12,500

UAW V CAP

Recipient	Date	Amount
20th District Mondale Delegate Committee -- Forsyth, IL	2/14/84	2,000
16th District Mondale Delegate Committee -- Rockford, IL	2/14/84	2,000
19th District Mondale Delegate Committee -- Charleston, IL	2/14/84	2,000
17th District Mondale Delegate Committee -- Rock Island, IL	2/14/84	2,000
18th District Mondale Delegate Committee -- Peoria, IL	2/14/84	2,000
12th District Mondale Delegate Committee -- Hoffman Estates, IL	2/14/84	2,000

New Hampshire Second District Delegates for Mondale -- Allenstown, NH	2/14/84	5,000
Sixth District Delegates for Mondale Committee -- Lansing, MI	3/15/84	3,000
New York State At-large Committee for Mondale -- New York, NY	3/23/84	5,000
Pennsylvania At-large for Mondale -- Philadelphia, PA	3/23/84	5,000
TOTAL:		$30,000

UMWA COAL MINERS PAC

Recipient	Date	Amount
22 C.D. Delegates for Mondale Committee -- Cobden, Ill	2/16/84	200
New Hampshire 2nd District Delgates for Mondale -- Allenstown, NH	2/22/84	5,000
Illinois 22nd C.D. Delegates for Mondale Committee -- Cobden, Ill	2/28/84	4,800
22nd Congressional District Delegates for Mondale -- Washington, PA	3/21/84	5,000
12th Congressional District Delegates for Mondale -- Apollo, PA	3/21/84	5,000
Kentucky at Large Mondale Delegates Committee -- Lexington, KY	3/21/84	5,000
Mondale 3rd Dist. Delegates Selection Committee -- Richmond, VA	3/21/84	5,000
TOTAL:		$30,000

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As shown, above, AFSCME's PAC made two contributions for $2,500 each to the Rhode Island First and Second Congressional District Mondale Delegate Committees. These two "delegate committees" filed a consolidated report on April 16, 1984, admitting they were "affiliated," but on their respective Statements of Organization, they had denied any affiliations.

The Mondale "delegate committees" for Illinois' first, second and seventh congressional districts provide a clear and unambiguous example of the coordination that has existed between the Mondale campaign and Mondale's "delegate committees". Donald G. Gross, on the Illinois State Staff for Mondale's official campaign, transmitted the Statements of Organization for these three committees to the FEC, using "Mondale for President" stationery and an "Illinois for Mondale" envelope. The first reports of these "delegate committees", filed in March 1984, were all sent in "Illinois for Mondale" envelopes, and those of the first and seventh congressional district committees appear to have been addressed by the same person.

The Ironworkers' PAC contributions in Pennsylvania raise additional questions about the extent of coordination taking place with respect to the Mondale "delegate committees". On March 28, the Ironworkers made out four separate checks to Pennsylvania At-Large Delegates for Mondale, one for $2,000 and three for $1,000 each. In its report filed on April 15, Pennsylvania At-Large Delegates for Mondale did not report the receipt of a single check from the Ironworkers. On the other hand,

Pennsylvania's 21st Congressional Delegates for Mondale report a $1,000 contribution from the Ironworkers on March 28, even though the Ironworkers report no such contribution to them.

Serious questions must be raised about whether Respondent union PACs have become affiliated with the Mondale "delegate committees" and the Mondale campaign. The Mondale 16th District Delegate Committee in Florida has as its Assistant Treasurer and Custodian of Records an individual by the name of Frank C. Ortis. The envelope in which this "delegate committee's" Statement of Organization was mailed bears a return address of "Mr. Frank Ortis, Broward County AFL-CIO. . . ." Twenty-four percent of this "delegate committee's" funds reported in April came from one of the Respondent union PACs, AFSCME. An additional twelve percent came from a New Hampshire "delegate committee".

The 22nd Congressional District Delegates for Mondale in Cobden, Illinois, rented office space from the Machinists, paid two individuals' salary and gas reimbursement by transmitting it through "Mondale for President" in Washington, D.C., and received thirty-nine percent of their March income from a Respondent union PAC, AFL-CIO COPE, all of which is reflected in their report filed on April 17. In addition, the envelope used to transmit this "delegate committee's" first report to the FEC (filed in March) is an "Illinois for Mondale" envelope which appears to have been addressed by the same person who addressed Illinois first and seventh "delegate committee" envelopes, as discussed above.

The affidavit of a Committee investigator, Attachment K, establishes that, in Chicago, the Textile Workers Union was operating in close cooperation with the Mondale campaign.

Illinois "delegate committees" received a significant part of their funds from Respondent union PACs, for example: Third District (March 7 -- 82%); Fourth District (April 17 -- 54%); 6th District (March 7 -- 53%); 7th District (April 19 -- 100%, when transfers from "delegate committees" in New Hampshire are included); Ninth District (March 7 -- 29%); Eleventh District (March 7 -- 62%); and 12th District (March 7 -- 100%). Many of the Illinois "delegate committees" had their printing done at the same company: Progress Printing, located at 3324 South Halsted Street, Chicago, Illinois 60608. Needless to say, some of the printed materials were remarkably similar to those of the Mondale campaign. (See, Attachments D (Exhibit 6) and L.)

This Illinois contribution pattern was repeated in Pennsylvania, for example: Second District (April 19 -- 100%); Seventh District (April 18 -- 100%, including contributions from a Carpenters' local and contributions from other "delegate committees"); 12th District (April 18 -- 89%); 13th District (April 16 -- 94%, including contributions from other "delegate committees"); Seventeenth District (April 16 -- 93%); and Reading (April 16 -- 73%). In their report filed on April 23, 1984, Pennsylvania's 22nd Congressional District Delegates for Mondale list two contributions totaling $7,000, but do not disclose the identity of the contributors.

AFL-CIO COPE held a meeting on March 22, 1984. The meeting, chaired by John Perkins, Executive Director of AFL-CIO COPE, was attended by representatives of fifteen or sixteen unions. Thirty-nine percent of the delegate committee contributions made by Respondent union PACs during February and March 1984 were made on or within seven days of that meeting.

On March 28, 1984, William A. Wilson, who is signing this Complaint as an Officer of the Committee, telephoned the 2nd District Mondale Delegate Committee office at 312-368-1984. His call was answered by a recording which stated that the number had been disconnected and that calls were being taken at 202-625-1600, the number for the Mondale campaign headquarters in Washington, D.C.

Walter F. Mondale has demonstrated an ability to control the decisions of those individuals who have the apparent power to direct the Mondale "delegate committees". Mondale campaign staff helped form his "delegate committees" and then helped staff them. Mondale "delegate committee" staff have coordinated their efforts with those of the Mondale campaign staff. The Mondale "delegate committees" are, therefore, affiliates of the Mondale campaign and, together with the Mondale campaign, share one limit of $5,000 which they may receive from any one union PAC, and its affiliates, for any one election.

AFL-CIO COPE has coordinated with fifteen or sixteen union PACs, apparently in connection with the funding of the Mondale "delegate committees." This coordination requires that all of

these union PACs be treated as affiliates and limited to a single, aggregate, $5,000 contribution to the Mondale campaign, including the Mondale "delegate committees." Not only does the aggregate amount contributed by Respondent union PACs greatly exceed this $5,000 limit, but also, the aggregate amount contributed individually by the Respondent union PACs exceeds $5,000.

For the reasons stated, Complainants pray that the Commission rule:

(1) That the Mondale "delegate committees" are affiliated with each other and with the Mondale campaign and, therefore, the Mondale campaign and its "delegate committee" affiliates are and have been entitled to accept no more than $5,000, in the aggregate, from any union PAC or its affiliates;

(2) That Respondent union PACs are affiliated with each other and, therefore, are and have been entitled to contribute no more than $5,000, in the aggregate, to the Mondale campaign and its "delegate committee" affiliates, or, at a minimum and in the alternative, that Respondent union PACs (together with their state, regional and local affiliates) are and have been entitled to contribute no more than $5,000 each to the Mondale campaign and its "delegate committee" affiliates; and

(3) That the excessive contributions in this case were made knowingly and willfully in an effort to avoid the

consequences of Mondale's profligate spending in the early days of his campaign.

Complainants pray that Mondale be ordered to return the excessive contributions and that Mondale and the Respondent unions each be ordered to pay the maximum civil penalty for a knowing and willful violation.

THE NATIONAL RIGHT TO WORK COMMITTEE

By: William A. Wilson
William A. Wilson, Vice President

The foregoing Complaint was subscribed and sworn to before me this 16th day of May, 1984, by William A. Wilson as Vice President of The National Right to Work Committee.

Lorraine A. Wilson
Notary Public

My Commission expires on November 30, 1987

Bud Hettinga
Ralph Martin (Bud) Hettinga, Jr.

The foregoing Complaint was subscribed and sworn to before me this 17th day of May, 1984, by Ralph Martin (Bud) Hettinga, Jr.

Pamela M. Ford
Notary Public

My Commission expires on 1/5/87

National Institute
For
Labor Relations Research

ELECTION
[illegible] DESMOND AND OTTO

BALTIMORE SUN
APRIL 15, 1984

Mondale's cute trick on finances

Washington

As the campaign of Walter Mondale presses on in its quest for the 1984 Democratic presidential nomination, too little attention is being paid to its possibly legal but disingenuous use of a loophole in the federal campaign finance law that is helping the campaign cope with its money problems.

Under a 1979 Federal Election Commission regulation, committees may be formed to raise and spend money in behalf of individuals running to be delegates to a party's national convention. The money thus raised may be used only for grass-roots political activity such as the purchase and distribution of leaflets, bumper stickers and buttons to help elect those delegates.

The regulation stipulates that the funds raised and spent by such committees will not be charged against the federal limit imposed on the presidential candidate in whose name they are running as long as their activities are not part of the candidate's own campaign.

In the Illinois, New York and Pennsylvania primaries, there is ample evidence, despite disclaimers from Mr. Mondale's managers, that such delegate committees were set up in concert with the national Mondale campaign and staffed with Mondale organizers transferred to or picked up by those committees.

The obvious advantage was to relieve the national campaign of the need to finance grass-roots activity in these states out of its treasury, which is subject to the federal limit and because of heavy early spending is approaching that ceiling. In Pennsylvania, the national Mondale committee had no offices in the state; all were designated Delegates-for-Mondale Committees and paid for out of funds raised by such delegate committees.

Individuals who have contributed the maximum allowed of $1,000 to a presidential candidate may give a like amount to any number of such delegate committees. Mr. Mondale's strategists insist this hasn't happened to any notable degree. If not, after going to all the trouble of using this loophole, Mr. Mondale ought to be looking for a new fund-raiser.

Another advantage of this arrangement when invoked was that the delegate committees could — and did — take contributions from labor union and other political action committees (PACs) without Mr. Mondale technically violating his public pledge not to accept any such PAC money.

This rank hypocrisy continued until the matter became public. Mr. Mondale reiterated his no-PAC-money stand and said he wished the delegate committees wouldn't take it, and reportedly the practice has now ceased or at least [illegible] diminished. But if you believe the early acceptance of labor PAC money was an inadvertence, let us introduce you to the Easter Bunny.

In the Pennsylvania primary just concluded, the Delegates-for-Mondale coordinator in Pittsburgh, John O'Leary, estimated that more than half of the funds at his disposal came from labor PACs.

Mr. Mondale's campaign chairman, James Johnson, says the criticism of the delegate committees misses the mark because the Mondale campaign will have no trouble staying within the federal spending limit, which by his calculations leaves the campaign with more than $6 million to spend until the July convention. But a few weeks ago, when the Gary Hart phenomenon blind-sided the Mondale campaign, the outlook for Mr. Mondale clinching the nomination in advance of the convention, thus reducing the money pressures, did not look nearly so promising as it does today.

Still, according to Robert Beckel, Mr. Mondale's national campaign manager, the delegate-committee device will continue to be used in the remaining primary and caucus states. He and Mr. Johnson say the money involved is peanuts. If so, why continue to use this unsavory-looking gimmick?

In the meantime, Mr. Hart has filed a complaint with the Federal Election Commission, which moves with all the speed of a somnambulant tortoise. Even in the event the FEC should eventually rule that the Mondale campaign violated the letter or spirit of the delegate-committee regulation, it will be too late to matter, and Mr. Mondale's advisers know it.

In 1980, the Ronald Reagan campaign exceeded the federal spending limit for the New Hampshire primary, which Mr. Reagan won, but by the time the FEC established the fact, it was dealing with President Reagan. Aside from the conduct of the Mondale campaign in the delegate-committee caper, the episode points up the need for the cop on the beat to make an arrest before the statute of limitations has run out on the suspect.

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THE WASHINGTON POST, TUESDAY, APRIL 24, 1984

Mondale Says PAC Aid to Delegates Ebbing

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 made a policy of not accepting PAC contributions and 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 those 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 grassroots 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.

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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 Fiore 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 5 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 Dan Balz contributed to this report.

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The Washington Post

Wednesday, April 25, 1984

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 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.

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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 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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ATTACHMENT A-6

THE WASHINGTON POST, WEDNESDAY, APRIL 25, 1984

Jackson Assails PAC Ties

By Tom Kenworthy
Washington Post Staff Writer

Jesse L. Jackson, campaigning yesterday in Maryland for the May 8 presidential primary, sharply criticized Democratic frontrunner Walter F. Mondale's acceptance of money from political action committees collected by local delegates. Jackson, joining criticism voiced earlier this week by Sen. Gary Hart (D-Colo.), said the campaign finance law is "either being stretched, extended or broken" by such PACs.

Jackson, in one of his strongest denunciations yet of the former vice president, said Hart was "essentially accurate" when he charged on Sunday that Mondale was financing his campaign in part through the "back door" by accepting "hundreds of thousand dollars" in PAC money collected by delegate committees.

Mondale said in Baltimore on Monday that he had instructed his local delegate committees to stop accepting PAC donations but defended fund-raising by such committees as perfectly legal.

Jackson, during campaign stops yesterday in Baltimore and Prince George's County, however, said the Minnesota Democrat's fund-raising efforts "come as close to rubbing or pushing the law as is traceable."

Jackson's criticisms of Mondale came in the midst of a general broadside against what he termed the "excessively heavy hand" organized labor is playing in the 1984 Democratic presidential contest.

"As opposed to using the democratic process," said Jackson, "labor has put all its eggs in Mondale's basket. In addition to diverting monies, it has provided him every kind of in-kind service. At what point does the use of free phones, trucks, cars and workers, at what point does that go over the border?

"If it's not an illegality, it's certainly in bad taste," Jackson added.

Jackson's visit to Maryland yesterday took him from Dundalk in Baltimore County, where he spent Monday night with an unemployed steelworker and her husband, to a revival-style meeting with more than 100 black ministers in Baltimore, to Prince George's County, where he addressed rallies at the University of Maryland, in Glenarden and Camp Springs.

While in Baltimore, whose heavily black electorate is critical to his chances of finishing second to Mondale in the state's primary, Jackson made the obligatory political tour of the revitalized Inner Harbor area. But the crown jewel of Mayor William Donald Schaefer's urban renaissance held little glitter for Jackson, he said.

Adopting the theme used by Billy Murphy, the black judge who unsuccessfully challenged Schaefer for mayor last year, Jackson spoke of the two Baltimores that exist side by side.

"There may be a new Baltimore for some," said Jackson to a crowd of about 100 onlookers, "but there is a Baltimore that hasn't changed." Referring to "people in their yachts" who visit the city's showplace, Jackson said "we don't want to sink the yachts at the top, but we do want to raise the boats at the bottom."

Murphy, who accompanied Jackson throughout the day, predicted that Jackson would exploit the theme more effectively than he had. "Jesse is saying it better than I said it. He's the first person since Martin Luther King Jr. to mobilize black people without threatening white people."

During the prayer breakfast with members of the Interdenominational Ministerial Alliance, Jackson seemed capable of galvanizing the politically influential ministers. The preachers gave Jackson a rousing welcome, as did members of the Ebenezer AME Church in Camp Springs, Jackson's final stop in Maryland.

His reception at the University of Maryland, however, may have been a disappointment for local organizers, who had hoped to fill the 15,000-seat Cole Field House to capacity for the $5-a-ticket rally. Only about 2,000 to 3,000 people attended.

At his only campaign appearance yesterday in the District—a $15-a-ticket evening fund-raiser at the home of City Council member H.R. Crawford (D-Ward 7)—Jackson made a virtue of his relatively small campaign war chest.

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ATTACHMENT A-7

"If Hart or Mondale had my [campaign] budget, they could not compete," Jackson told a cheering crowd of several hundred supporters who gathered under a blue-and-white tent in front of Crawford's southeast Washington home. "And if I had their budgets they could not compete."

Jackson was flanked by several of his top District supporters, including Mayor Marion Barry and City Council members Frank Smith Jr. (D-Ward 1) and Wilhelmina J. Rolark (D-Ward 8). Rolark is Jackson's campaign coordinator in the District.

Barry, who has campaigned extensively for Jackson in earlier primaries, described the candidate as "the conscience of the Democratic Party" and told the crowd that Jackson "does not take your vote for granted."

"For too long we've been left out of the [political] process," Barry told the largely black gathering. "Now we're part of it."

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National Institute
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The Washington Times
WEDNESDAY, APRIL 25, 1984

Democrat reformers PAC it in

The political "reform" itch, like most itches, gets worse when you scratch it. Take campaign financing. Resolved to put "fat cats" on a tight leash, the Democrats in 1974 pushed through a "reform" law that only a computer programmer could love. We're pleased to report they're having second thoughts.

No one, said the law, may give more than $1,000 to any one campaign (plus $1,000 for the primary, and $1,000 for a runoff). Anyone may give $20,000 to a party's national committee, but annual totals may not exceed $25,000. (Unlimited non-reportable sums may go to a party's "building fund," however.) There's also a formula limiting what candidates may spend. Got that? Next slide, please . . .

Names of contributors and amounts must be filed regularly with the Federal Election Commission, which spends about $10 million a year to keep track of all this and chide delinquents.

In 1976 Sen. James Buckley argued the law abridged free speech. The Supreme Court split the difference, ruling that limits on a candidate's total spending were a no-no, but limits on contributions were just fine. The candidate could spend as much as he wanted, providing he spent his own money. See how fair that is?

In 1983 the Communists complained that if they had to keep records and report to the FEC, the party's angels might be harassed or embarrassed. The federal courts agreed. Now no one can find out who gives how much to the CPUSA. Wait — it gets even better! . . .

The "reform" sparked the proliferation of PACs, political action committees, now deplored by reformers. House candidates, they say, cannot raise enough money locally, so they must now panhandle a passel of PACs which may not represent any district interest. PACs, by the way, may donate up to $15,000 to any candidate.

Messrs. Mondale and Hart supported these reforms. They also promised not to accept PAC money this year. But now Mr. Mondale, who blew most of his wad in the first few contests, has come up with a dandy loophole — setting up more than 100 state-level "delegate committees" which have so far raked in about $400,000 from PACs. Mr. Hart is furious and is taking his beef to the FEC. How's that for poetic justice?

It's time for Congress to undo the mischief it created. Let everyone give as much as he wants, and let the public know who is giving and how much. Then let the voters decide.

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THE NEW YORK TIMES, THURSDAY, APRIL 26, 1984

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 Flies 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 individual 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."

Insistence 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 ascendancy.

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. Mon-

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dale 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 Democrats: A Delegate Update

"Tuesday" represents results for 11 of the 13 delegates at stake in Vermont's caucuses. "Other" represents 55 delegates for Mayor Harold Washington of Chicago and 23 votes for George McGovern. Tallies in some states represent projections in incomplete caucus processes and are subject to change.

	Previous	Tues.	Total
Mondale	1,131	4	1,135
Hart	595	7	606
Jackson	166	0	166
Uncomm.	321	0	321
Other	58	0	58
TOTAL	2,274	11	2,285

TOTAL DELEGATE VOTES: 3,933

NEEDED TO NOMINATE: 1,967

Source: United Press International

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National Institute
For
Labor Relations Research

THE WASHINGTON POST
Thursday, April 26, 1984

The More Mondale Flails, the Deeper He Gets Into PAC Mess

Walter F. Mondale can't look good in his attempts to dig out of his worst embarrassment since his New Hampshire primary defeat. He looks either like a hypocrite or a hand-wringer in his attempt to stop the underground flow of political action committee (PAC) money into his campaign.

He may wish that he hadn't taunted his rival, Sen. Gary Hart (D-Colo.), in the Illinois primary for failing to scotch the famous television commercials mentioning Chicago alderman Edward R. Vrdolyak.

When Hart pleaded that he could not get them off the air, Mondale scoffed, "Here's a man who says he wants to be president of the United States . . . and he can't get an ad off TV that he pays for in 48 hours."

Mondale has moved to control the damage done to him by his delegate committees, which it turns out have been receiving hundreds of thousands of dollars in the PAC money he has forsworn.

He has told them to disband. He did not say why the 124 groups he previously insisted were "autonomous" will respond to the telegram containing this request when they blithely ignored two letters in which he appealed to them to follow his lead in spurning PAC money.

In early 1983, Mondale, like Hart, took the pledge on PAC contributions.

The "delegate committees" were supposed to be wholesome organizations that would encourage individual enterprise and neighborhood participation in the electoral process.

They got out of hand for two reasons. One was that Mondale spent to the edge of the federal limit in an effort to score an early knockout.

The other is the compulsive competence of his campaign, which apparently turned the committees into a highly effective welfare program for its national staff.

Reports to the Federal Election Commission show a pattern of laid-off headquarters personnel being transferred to the payrolls of local committees.

Flush primary states sent their overflow to the truly needy elsewhere.

It is possible that New Hampshire loyalists found out on their own the names and addresses of hard-up delegates in Florida.

The notion that Mondale might not have known about any of this is not seriously entertained.

He is an organization man who keeps his eye on every sparrow in his wondrously efficient campaign.

Mondale protests that none of this activity was improper, much less illegal. But

Mary McGrory

SLEAZE

the law is quite specific: "Expenditures made . . . 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 to be a contribution to such candidate."

Hart, who has filed a formal complaint with the FEC, is thundering at a red-faced Mondale to give the money back.

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CONTINUED FROM PREVIOUS PAGE

Hart's campaign manager, Oliver (Pudge) Henkel, says that Mondale's cease-and-desist order is not enough.

"He has implicitly acknowledged the impropriety and likely illegality of the committees. But we want a full accounting of the funds raised and spent," Henkel said. "This is a deeply moral issue."

Mondale has been ambivalent about the conflicting demands of his budget and his promises ever since the PAC money surfaced in the New York primary last month.

"I want it known that I don't want any PAC money because I am dead serious about the issues," he said March 29. In the next breath, however, he said that the committees are "independent."

The "autonomous" argument was set back severely by the publication of a memo written by his delegate coordinator, Elaine Kamarck.

On Jan. 12 she told delegates that while that while Mondale does not take PAC money, they should make their own decisions. She also urged them to call Mondale headquarters if they had legal questions.

Mondale's campaign manager, Bob Beckel, echoed the futility argument.

"We have no right to go to the labor unions and tell them not to spend their money," he said.

But Mondale, when he began to feel the heat, changed his mind. Monday night, according to one of his staff, he telephoned AFL-CIO President Lane Kirkland to tell him he wanted the PAC money turned off.

Whether Hart can use the issue, with all it says about Mondale's candor and dependence on labor, is a question. His Texas campaign manager, Rep. Martin Frost (D-Tex.), says that he doesn't think it cuts much down there.

But the Reagan campaign committee, which is all but inundated in campaign checks, is certain that the president could exploit it in encounters with Mondale.

"He says he doesn't want the money coming in," said Reagan campaign secretary James Lake, "but he says he can't stop it. Is that leadership?"

Democrats are reaching a glum consensus: "If Mondale is the nominee, the sleaze factor against Reagan is gone."

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National Institute
For
Labor Relations Research

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Richmond Times-Dispatch

Friday, April 27, 1984

Mondale PACs It In

Walter Mondale is for goodness and decency in government. At least that's what we're to understand from his campaign sermons. The son of a preacher and former sidekick to Jimmy "Trust Me" Carter, he professes himself shocked by the "sleaze" of the Reagan administration and says he intends to make a campaign issue of it.

Trouble is, practicing what Mr. Mondale preaches is too big a strain for most people, apparently even for Saint Walter himself. For example, the former vice president preached long and loudly, to anyone still listening, on the evils of political action committee money, which he said distorts the democratic process. At the end of the sermon, however, the labor PACs held out their money, and Mr. Mondale's ushers passed the collection plate.

What Mr. Mondale did was to set up a union-financed committee organization that helped him evade tough election contribution laws. PACs are prohibited from giving a candidate's central committee more than $5,000; Mr. Mondale said he wouldn't accept that money on ethical grounds anyway. That restriction, however, did not prevent the formation — at the behest of his campaign headquarters — of supposedly independent Mondale "delegate committees" that could receive funds as well.

Now that the Democratic nomination seems once again in hand, Mr. Mondale is renouncing the committees — though not, apparently, the more than $315,000 that union PACs poured into them — and urging them to disband. Until now, however, he fretted about the contributions all the way to the bank.

Federal Election Commission reports indicate that 100 of these committees had been set up at the state level since January. By spreading funds among many committees, PACs' total contributions could exceed the $5,000 limit.

Among the examples cited in a recent Wall Street Journal story were $54,388 from the American Federation of Teachers to 38 of the delegate committees, $23,500 from the United Auto Workers, $43,388 from the American Federation of State, County and Municipal Employees, and $23,500 from the Communications Workers of America.

Mondale supporters claimed the delegate committees were grass-roots organizations outside the control of his central committee, which would make the contributions legal. Commission records would seem to indicate otherwise. Was it really just coincidence that the auto workers — a union with close ties to the Mondale campaign organization — sent six identical checks to six of his delegate committees in Illinois on the same day? Was it coincidence that 30 people dropped from the Mondale central committee suddenly appeared on the payrolls of the grass-roots committees? Gary Hart doesn't believe so and filed an official protest.

More than 85 percent of the money received by these committees was donated by labor PACs, and little of that came from local unions. Clearly, the arrangement enabled Mr. Mondale to pick a peck of PAC money. Ironically, the man who warned of PACs' corrupting influence fell prey to it.

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National Institute
For
Labor Relations Research

The Washington Post

Saturday, April 28, 1984

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, were 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 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 preconvention 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.

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"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 pleas 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 $850 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.

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National Institute
For
Labor Relations Research

Richmond Times-Dispatch

Saturday, April 28, 1984

Patrick J. Buchanan

How PAC-Man Pulled It Off

WASHINGTON — Well, well, well. Seems as though that priggish person who had the kids expelled from the congregation for smooching in the alcove has just been nailed in a midnight raid on Plato's Retreat.

The Chablis-and-brie crowd has been regaled for weeks with Fritz Mondale's cutting commentary on the moral laxity of President Reagan's government: "Every week, another rotten apple seems to fall out of that tree."

This past week, red-faced Fritz himself came tumbling out from among the branches.

It appears that the great comeback of Fighting Fritz was bought with special-interest bucks Mondale assured us he would never accept, that Candidate Mondale raked in the pot in a high-stakes poker showdown with Gary Hart — only after dealing himself a couple of extra cards off the bottom of the deck.

As of today, Mondale is headed for San Francisco to pick up a nomination that might have been Gary Hart's, if the Mondale campaign had not extravagantly cheated on the rules by which they had agreed to play.

***

HEREWITH THE CHRONOLOGY:

In January, with the rest of the good liberals in competition, Mondale took the Common Cause pledge not to accept special-interest money from the political action committees, or PACs.

By early March, however, having lost in New Hampshire, Maine and Vermont, Fritz Mondale saw his career on a life-support system, his campaign bumping up against the legal spending limits. Suddenly, "delegate committees" began blooming in the crucial primary states. Dozens, then scores. These are "autonomous" and "independent," our champion declared. Just to be sure they, too, abided by the Mondale proscription against PAC money, Mondale dispatched several publicized epistles insisting they adhere to the same rules.

'Documentary evidence points to a cynical and systematic effort of Mondale's agents to collude to evade the letter and trample all over the spirit of a federal law Mondale customarily venerates as an icon of "post-Watergate" reform.'

While Fritz was wagging his finger, however, chief delegate coordinator Elaine Marmac was sending along an instruction kit specifying exactly how the delegate committees could go tap into the PAC millions.

Tap they did. According to a Washington Post review of Federal Election Commission records, the delegate committees took to the PAC money like television pooches to the Alpo. Cash was smoothly transferred from delegate committees in states where primaries had just been held — into states where primaries were imminent. Staffers dropped by a Mondale campaign running low on money turned up on the payroll of delegate committees flush with fresh cash. The operation seems to have had all the randomness of the Inchon invasion. Documentary evidence points to a cynical and systematic effort of Mondale's agents to collude to evade the letter and trample all over the spirit of a federal law Mondale customarily venerates as an icon of "post-Watergate" reform.

Alternative conclusions suggest themselves: Either Mondale is an administrative incompetent incapable of managing a parking lot; or Mondale is a phoey, an 18-carat hypocrite who secretly indulges a political vice he piously and publicly deplores.

Caught *in flagrante*, Mondale phoned Lane Kirkland of the AFL-CIO, the great philanthropist himself, and begged him to stop funneling back-door bucks into Mondale's own delegate committees. When that gesture did not still the uproar, Mondale declared Wednesday he would disband the committees altogether. Fritz would like to change the subject to space weapons.

To Gary Hart's demand that Mondale return the money that ensured his comfortable margins in New York and Pennsylvania, the former vice president responded: "This money is used at the local level for delegate selection. ... It's not for me." Yes teacher, that's right, the dog ate my homework.

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WHILE THE REVELATIONS scream for appointment of a special prosecutor when Dutch returns from the Great Wall, the real issue here is sanctimony, the fraudulent piety of Parson Mondale.

Let Ed Meese keep some cuff links the South Koreans gave him, let Jim Watt make a verbal gaffe on affirmative action, let Dick Allen accept a cheap watch from Japanese friends before taking up duties at the National Security Council, and Fritz Mondale will scream "sleaze" and chair the Council of Purification that drives them forever from the Temple of Government.

Well, now, the mob is milling around Parson Mondale.

"This is a deeply moral issue," solemnly intones Hart's campaign manager. Again, we are reminded of the poet's observation that "morality is the argument we use against those we most dislike." See ya at the hanging.

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National Institute
For
Labor Relations Research

ATTACHMENT A-17

THE NEW YORK TIMES SUNDAY, APRIL 29, 1984

Mr. Mondale UnPACs

Even as Walter Mondale abolished the 127 supposedly independent committees formed to support his convention delegates, the candidate protested that the entire operation had been legal, proper and beyond his control. The action, though belated and taken only after pressure from rival Gary Hart, was welcome. The evasiveness was not.

The delegate committees have been conduits for political action committee money, chiefly from organized labor. They may indeed be wholly legal, though the Federal Election Commission has yet to say so. But was the operation proper? Certainly not when measured against Mr. Mondale's righteous rejection of campaign contributions from special-interest PAC's.

And beyond his control? Election Commission files show a pattern of direction from the central Mondale campaign, including the shift of funds and personnel between committees and headquarters and coordination to defray the national campaign's expenses in key states. Much to his credit, Mr. Mondale saw Mr. Hart's point and decided to give back the questionable money.

Such forthrightness did not mark the start of this enterprise. Mondale headquarters reminded delegate committee chairmen in January that the candidate was not accepting PAC money, but also advised each committee that it was free to make its own decision about which contributions to accept.

When the Hart forces began to challenge the arrangement, Mr. Mondale reaffirmed his personal opposition but said he couldn't control those committees. That remained his posture until the evidence of coordination began to pour in from commission filings. Score one for the disclosure provisions of the Federal election law.

To be realistic, the committee arrangement was a desperation move. Mr. Hart's stunning victory in New Hampshire left the Mondale campaign reeling and its financial plan in shreds. Having "front-loaded" so much of its spending, how could it now meet the suddenly urgent demands of the next primaries?

The need for survival explains but does not excuse, as Mr. Mondale now seems to recognize. Mr. Hart may grumble that his opponent is giving the money back only when he no longer needs it, but there's no denying the wisdom of the move. It's just about all anyone could ask of a candidate who made a serious mistake.

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State of Pennsylvania)

City of Philadelphia) May 14, 1984

A F F I D A V I T

KNOW ALL MEN BY THESE PRESENTS:

That I, Albert J. Brown, residing at 1012 W. Clearfield Street, Philadelphia, Pennsylvania, 19132, Telephone: (215) 223-3796, a private investigator for eight (8) years, being duly sworn, depose that:

1. On April 9, 10 and 11, 1984, in connection with an investigation of possible violations by organized labor of Federal Election Committee(FEC) Regulations related to the U.S. Presidential primary campaign. I went to an office at 1420 Walnut Street where, in back of the office was a large "Mondale At-Large Delegate Committee" sign. I had, in part, gone to that office because State Senator Joe Rock, who had been at a political rally on April 7 on behalf of Senator Mondale at the International Union of Electronics, Electrical, Technical salaried and Machine Workers, AFL-CIO at 6300 Old York Road in Philadelphia, had directed me to that office in response to my question of how I could help Senator Mondale's Campaign.

2. I volunteered to work for the Mondale campaign and during the times that I was in the office and from conversations with some of the office personnel with whom I conversed, some of these being on the street, I identified the following people whom I believe to be staffers or organizers for the Mondale campaign and whom I do not believe were unpaid volunteers.

a. Kathy Russell, a young woman who seemed to be a supervisor and especially to be in charge of distribution of Mondale campaign literature. She seemed to receive a number of official calls by

name. She also seemed to be in charge of closing down the office the day after the election on April 11, 1984. She wore a gold pin in the shape of the map of Pennsylvania and with the name "Mondale" imprinted in black thereon, which I understood to be the type of pin worn only by Mondale staff personnel as opposed to unpaid volunteers. From the circumstances, incidents and conversations, I got the impression that she coordinated activities between the Mondale At-Large Delegate Committee office at 1420 Walnut Street and the Mondale Philadelphia traveling headquarters offices in the adjacent Bellevue Stratford Hotel; in the "Imperial Suite" and other adjacent rooms on the fourteenth floor. I determined the location of the Mondale traveling headquarters by actually visiting the suite area on April 9, while in the Delegate's office, Jennifer Collins (identified in "b" Below) answered my question as to Russell's whereabouts, that Russell had "taken papers up to the suite area."

b. Jennifer Collins, who was also called "Little Ginny". She seemed to be an assistant to Kathy Russell and also wore a Mondale staffer pin. Ginny commented that they were "going back to Washington" after they closed down the Philadelphia campaign office.

c. "Al, also called "Boss Al", a black male about 5'11" and weighing about 205 pounds seemed to be somewhat in charge of distribution of material, especially when Kathy Russell was not in the office. He seemed to receive calls for him by name and was very knowledgeable

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of the activities going on, but from circumstances and conversations I believe he resided locally and was not part of the traveling staff.

WITNESS THE FOLLOWING signature:

Albert E. Brown

State of Pennsylvania)

County of Philadelphia)

I, Janice Roberts, a Notary Public in and for the County aforesaid, in the State of Pennsylvania, do hereby certify that Albert Brown, whose name is signed to the above writing, bearing the date of the 14 day of May, 1984, has personnaly appeared before me in my County aforesaid and sworn and acknowledged the same.

Given under my hand this 14 day of May, 1984.

Janice D. Roberts
Notary Public

My commission expires on the 26 day of October, 1987.

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ATTACHMENT C

State of Pennsylvania)
City of Philadelphia)

A F F I D A V I T

KNOW ALL MEN BY THESE PRESENTS:

THAT I, Nicole Chambers, NC AKA: Josefina Rivera NC residing at 2130 Wallace Street, Philadelphia, Pennsylvania, Telephone: (215) 329-2726, being duly sworn, depose that:

1. On April 9, 1984, I went to the Mondale At-Large Delegate Committee office at 1420 Walnut Street, Philadelphia, and volunteered to work on behalf of the Mondale campaign. I first went to the office shortly after 3:00 p.m. and stayed for about 1/2 hour and at the request of the staff people, returned at about 4:30 p.m. and stayed and worked until about 6:00 p.m.

2. While working in the office, I identified some people whom I believed to be Mondale staff workers as opposed to being unpaid volunteers. One of the ways that I identified them as being staff people was that they wore a gold pin in the shape of a map of Pennsylvania with the Name "Mondale" printed in black thereon. Also, I believe them to be paid staff people because they seemed to be in a good mood, and all, at one time or another, mentioned the "Mondale paychecks" they had just gotten. From the conversation I overheard, the three female staffers (identified in a, b and c below) all were staying at

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the Bellevue Stratford Hotel. Their conversation also centered around their being invited to go to work for the Mondale campaign in connection with the California Mondale Presidential primary campaign, since the members of their group were considered Mondale's "best staffers" and it seemed they all planned to go to California. Those identified were as follows:

a. Wanda, whose last name I do not know, is a black girl, about 5'6" tall, weighing 120-130 pounds, and with short black hair. She seemed to be in charge of distribution of Mondale campaign material during the time I was in the office. She said that she had had a full time job in New York, but had left that job to come to Philadelphia to work on behalf of Mondale.

b. Ann Lewis, to whom I was introduced by Wanda by name, is a white woman about 38 years old, about 5'7" tall, 135-140 pounds, had blond hair and wore glasses. She was apparently responsible for paying the staff people in some way, since the five or six people who came into the office asking for their pay checks (but whom I cannot identify further) were directed to Ann Lewis, who gave them checks.

c. Doris Lassons, to whom I was introduced by Wanda by name, is a black woman in her early 40's, about 5'5" tall and heavy set, weighing probably about 160 pounds. I do not know what her specific job was, but I recall her making

N.C

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a comment to the effect that she had trouble "getting the last two delegates".

d. "Bill", whose last name I do not know, is a white man, about age 50, about 5'5" tall, rather heavy set, weighing approximately 170 pounds and having salt and pepper hair and a moustache. He seemed to be assisting Wanda in the distribution of campaign material. I got the impression that he was a local Philadelphia area resident. He did not wear a Pennsylvania "Mondale" pin like the three females described above and he talked about having worked for Philadelphia Mayor Goode's election campaign. He indicated that he was paid because he made a comment to the effect that he was doing it for the money or that the money was good.

WITNESS THE FOLLOWING Signature: Nicole Chambers
Josefina Rivera

Nicole Chambers AKA: Josefina Rivera

State of Pennsylvania)
County of Phila)

I, Robert J. Wescott, a Notary Public in and for the County aforesaid, in the State of Pennsylvania, do hereby certify that Nicole Chambers, whose name is signed to the foregoing affidavit, personally appeared before me in my County aforesaid and swore and acknowledged the same this 17 day of May, 1984.

ROBERT J. WESCOTT, JR.
Notary Public, Phila., Phila. Co.
My Commission Expires Feb. 23, 1987

Robert J. Wescott
Notary Public

My Commission expires on the _____ day of _____, 19___.

8504050440

State of Pennsylvania)
City of Philadelphia)

A F F I D A V I T

KNOW ALL MEN BY THESE PRESENTS:

That I, Albert J. Brown, residing at 1012 W. Clearfield Street, Philadelphia, Pennsylvania, 19132, Telephone (215) 223-3796, a private investigator for eight (8) years, being duly sworn depose that:

1. On April 10, 1984, in connection with an investigation of possible violations by organized labor of Federal Election Commission (FEC) Regulations related to the U.S. Presidential primary campaign, I went to the Mondale At-Large Delegate Committee office at 1420 Walnut Street in Philadelphia.

2. While in the bathroom of the office, I observed in a box on the floor, and procured, Mondale campaign material, much of which seemed to be from other areas of the country and copies of which are attached as exhibits hereto and described as follows:

Exhibit 1: A flyer printed on two sides addressed "Dear Fellow Oklahoma Democrats", and on the back headed "PRESIDENTIAL CANDIDATE QUIZ". The bottom back of the flyer bears the annotations "Paid for by Mondale for President, Inc." I placed my initials "A.J.B." and the date "4-10-84" on the back of this flyer.

Exhibit 2: A sample ballot entitled "OFFICIAL MONDALE DELEGATE'S BALLOT" and solicits the election of Pennsylvania Second Congressional District Mondale delegates. There is a statement at

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the bottom of this ballot: "Paid for by Second Congressional Delegates for Mondale, Anthony McNeil, Treasurer." I place my initials "A.J.B." and the date 4-10-84 on the back of this "ballot".

Exhibit 3: A poster, 11"x17" entitled: "Reaganism: A Price Too High". The bottom of this poster is annotated: AFL-CIO COPE Washington, D.C. 20006" and "Reprinted from the AFL-CIO news." I placed my initials "A.J.B." and the date 4-10-84 on the front of this poster.

Exhibit 4: A flyer entitled "MONDALE'S COMMITMENT TO BLACK AMERICANS" and marked "Paid for by Mondale for President". This flyer bears an imprint of the map of Illinois and solicits support for Mondale delegates with the last names of Daggett; Jennings; Harris; Taylor; Saries, Gonzales; Bush; Quinn; and Penn. I placed my initials "A.J.B." and the date 4-10-84 on the back of this flyer.

Exhibit 5: A flyer entitled: "Walter Mondale - THE EXPERIENCE TO KNOW WHAT NEEDS TO CHANGE...", the back of which is entitled "THE ECONOMY - KEY TO OUR FUTURE". It is noted that the flyer is issued by Mondale for President, Washington, D.C. and that it is "Paid for by Mondale for President, Inc." I placed my initials "A.J.B." and the date "4/10/84" on this flyer.

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Exhibit 6: A sample ballot entitled Walter Mondale - The Experience to Know What We Need to Change..." and noted to be issued by "Illinois for Mondale" and marked "Paid for by Mondale for President, Inc." I placed my initials "A.J.B." and the date 4/10/84 on the sample ballot.

Exhibit 7: A press release issued by Mondale Illinois State Campaign on Wednesday, January 4, 1984 entitled "MONDALE CAMPAIGN ANNOUNCES ILLINOIS DELEGATE SLATES.

WITNESS THE FOLLOWING signature:

Albert J. Brown

State of Pennsylvania)
County of Philadelphia

I, Janice D. Roberts, a Notary Public in and for the County aforesaid, in the State of Pennsylvania, do hereby certify that Albert J. Brown, whose name is signed to the foregoing affidavit, personally appeared before me in my County aforesaid and swore and acknowledged the same this 14 day of May 1984.

Janice D. Roberts
Notary Public

My Commission expires the 26 day of 10, 1987

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EXHIBIT 1

Dear Fellow Oklahoma Democrat,

Today there's a new argument in the land, a new idea about the Democratic Party and where it should go. This I believe is the essence of the battle we're in. If you fight for values the Party has always believed in, you're supposed to go on a guilt trip, but if you fight against them, you're supposed to be applauded.

If you fight for better schools, you're old, but if you fight for sub-minimum wage for teenagers, you're new. If you fight for civil rights, it's a special interest, but if you buckle under to the Hospital Lobby, it's a new idea.

If you defend Medicare, you're cautious, but if you attack entitlements, you're courageous. If senior citizens want Social Security, that's the past, but if A.T.& T. wants to tack a big bill on your phone for the privilege of using long distance lines, that's the future.

If a worker wants a raise, that's greed, but if a plant closes down that's trendy.

If you want big corporations to pay their share of taxes, you're old hat, but if you want working families to pay more taxes, you're high tech.

I DON'T ACCEPT IT !

Help me to keep this fight for the soul of the Democratic Party alive.

Let's keep this debate over the future alive.

I entered this race because of principle not ambition, and I will stay in this race until the end because of principle

Sincerely,

Walter F. Mondale

MONDALE

FOR PRESIDENT

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PRESIDENTIAL CANDIDATE QUIZ

Before you choose a democratic candidate for president please take the following quiz.

Section 1. Choose 1 Presidential Candidate for each question

a. Which Democratic candidate was the first to support a nuclear freeze?

b. Which candidate was Attorney General, Senator, and Vice President?

c. Which candidate has led the fight for Social Security (hint: he wrote the Medicare bill), Civil rights, environment and equal rights for women. (He wrote the women's education equity act, created a comprehensive day care system vetoed by Nixon and helped create Headstart.)

★ The answer to the questions in Section 1 is Walter Mondale.

Section 2. Answer the following True or False questions.

a. Gary Hart first refused to endorse the nuclear freeze and then he waited a year before co-sponsoring it in the Senate. True or False.

b. Five weeks after Gary Hart co-sponsored the nuclear freeze he co-sponsored Ronald Reagan's approach to arms control called build down (build down was Reagan's attempt to kill the freeze and to continue production of new and more powerful nuclear weapons). True or False.

c. Gary Hart voted against returning money to the trade adjustment assistance fund after Ronald Reagan gutted the program in Fiscal Year 1982. (This fund provided money to retrain and relocate workers who lost their jobs due to foreign imports.) True or False.

★ The answer to all the above questions is True. Please continue to Section 3.

Section 3. Please answer the following multiple choice questions.

a. The sub-minimum wage for teenagers

1. would put older workers out of jobs
2. is supported by Ronald Reagan
3. is supported by Gary Hart
4. is opposed by Walter Mondale
5. all of the above

b. The Chrysler loan program

1. saved hundreds of thousands of jobs
2. was opposed by Gary Hart
3. was supported by Walter Mondale
4. all of the above

★ The answer to the questions in Section 3 is all of the above.

Secton 4.. Extra Credit

a. Who do you want to negotiate the arms control agreement with the Soviets?

This is just a quiz. The real test is this Tuesday at your Democratic Precinct Meeting. Don't base your answers on trendiness. Choose a candidate who has the record, the ideas and the experience - Walter Mondale. For answers to other questions on the candidate or for information on your Precinct Meeting please call:

OKC 239-2246
Tulsa 584-0904

Paid for by Mondale for President, Inc.

EXHIBIT 2

Official MONDALE Delegate's Ballot

On Tuesday, April 10th Elect

THE SECOND CONGESSIONAL DISTRICT

Mondale Delegates

8504050440 2

DELEGATE TO NATIONAL CONVENTION

139 Blondell **REYNOLDS**

153 Rosalee **GEORGE**

157 Matthew **DAVIS**

163 Fred **LUKE**

164 Patricia J. **HALPIN**

174 Doris A. **SMITH**

179 Herman **WOODEN**

184 Ann J. **LAND**

185 Arnold C. **STORR**

ALTERNATE DELEGATE

195 Dennis C. **WHITE**

197 Jeffrey D. **MORAN**

199 Leslie B. **KERNODLE**

Paid for by Second Congressional Delegates for Mondale
Anthony McNeil Treasurer

P.J.B.
4-10-84

EXHIBIT 3

Reaganism: A Price Too High

THE STATISTICS OF PAIN

The statistics on this page sum up—but by no means tell the whole story of—the cost in pain of the Reagan Recession and the Reagan cuts in important people-helping programs. It is a cost not merely offset by the present period of partial recovery—a recovery which many economists fear might collapse in early 1988 under the weight of record-high Reagan deficits.

Millions of working and needy Americans have paid and are still paying a staggering price for Reaganism: In jobs lost, in health care withheld, in nutrition denied, in higher education forestalled or abandoned, in job training aborted, in homes foreclosed.

Their story—by the numbers—follows. (Figures from AFL-CIO Dept. of Economic Research, Congressional Budget Office, Children's Defense Fund, U.S. agencies.)

The Jobless... Maximized

Number of individual workers suffering one or more episodes of unemployment 1981 through 1983: 30 million (minimum figure).

Number of individual workers suffering joblessness by year: 1981, 23 million; 1982, 27 million; 1983, 27 million.

Average mean duration of unemployment, 1981-83 respectively: 14 weeks, 16 weeks, 20 weeks.

Average gross weekly earnings lost per year by jobless workers: 1981, $3,315; 1982, $4,005; 1983, $5,620.

Over-all gross weekly earnings of workers lost per year through unemployment: 1981 loss $76.2 billion; 1982 loss $108.1 billion; 1983 loss $151.7 billion.

Total gross weekly earnings lost through unemployment 1981 through 1983: $336.1 billion.

Value of lost production 1981-83 respectively (as result of unemployment above 1979 level): $180 billion, $390 billion, $380 billion.

Total value lost production 1981-83: $950 billion.

Loss to U.S. Treasury through unemployment, 1981-1983 (over 1979) respectively: $54 billion, $117 billion, $114 billion.

- Total loss to Treasury through unemployment 1981-83: $285 billion (enough to substantially reduce record Reagan deficits).

- Number of persons losing some or all health coverage as result of unemployment: 10.7 million.

- Mortgage foreclosures during Reagan Recession (actual or in foreclosure process): 116,000 in 1981; 160,000 in 1982; 178,000 in 1983 (highest levels since tracking of statistic started in 1953).

- Business failures during Reagan Recession: 16,794 in 1981; 25,364 in 1982; 30,794 in 1983 (highest since 31,822 in 1931 and four times 1970 rate of 7,564). Total business failures 1981-83: 72,934.

- Rate of business failure: In 1979, 28 per 10,000; in 1982, 89 per 10,000.

The Needy... Needier

- **Needy persons losing *all* food stamp aid: 1 million.**

- **Number of working poor, others, losing *some* food stamp aid: 4 million.**

- **Increase in number Americans living in poverty: 6 million (1981-82 alone). Rate of poverty now highest in 17 years—15% of all Americans.**

- **Cuts in Aid to Families with Dependent Children program (AFDC): $4.8 billion (13 %); 725,000 families affected, 1.5 million children.**

- **Children of needy families losing Medicaid protection: 700,000 (1982 alone).**

- **Children of needy families losing services at community health centers: 290,000.**

- **Cuts in child nutrition programs: 28 %.**

- **Number of children from low-income homes losing free or reduced-price school lunches: 1.1 million.**

- **Number of children from low-income homes losing free or reduced-price school breakfasts: 900,000.**

- **Cutback in higher education loan program: 27%.**

- **Number of young persons affected by cutbacks in low-interest loans for higher education: 700,000-plus.**

- **Cuts in other student financial aid programs: 13%.**

- **Medicaid/Medicare cuts: 5%.**

- **Other health program cuts: 22%.**

- **Cuts in job-training for disadvantaged: 35% ($7.4 billion).**

- **Funds cut from retirement programs over-all—social security, civil service pensions, veterans' benefits: $26 billion.**

- **Funds cut from income security programs over-all—food stamps, unemployment insurance, housing aid, AFDC: $27 billion.**

- **Funds cut from health programs over-all: $18.5 billion.**

- **Funds cut from education and social service programs over-all: $13.7 billion.**

- **Funds cut from employment and training programs over-all: $25 billion.**

- **Total funds cut from people-helping programs under Reagan (1981-84): $110.2 billion.**

NOTE: The $110.2 billion cuts in people-helping programs represents only that portion of Reagan-proposed slashes that Congress agreed to. They were not really deep enough for his taste. Had all Reagan cuts been adopted as proposed, the $110.2 billion figure would balloon to the $140-$150 billion range over the same time period.

Turn It Around—Register/Vote

AFL-CIO COPE • Washington, D.C. 20006

Reprinted from the AFL-CIO News

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PAID FOR BY MONDALE FOR PRESIDENT

Mondale's Commitment to Black Americans

NOW

The Mondale Campaign is utilizing the services of Black Business.

- Campaign travel is being written by 7 Winds and 4 Seas Travel Company, a black travel agency located in Baltimore.
- Campaign funds are deposited in a black owned bank, the United National Bank of Washington, D.C.
- A large percentage of stress paper and printing services are handled by Macoba-King, a black owned printing company.
- In addition, the campaign is being audited by a black accounting firm in Washington, D.C.
- As the campaign grows, it will be looking for additional opportunities to do business with minority firms.



On March 20th Vote for

MONDALE

AND THE MONDALE DELEGATES

- ILLINOIS C. DAGGETT (MONDALE) 867
- JACOB JENNINGS, JR. (MONDALE) 868
- JOAN W. HARRIS (MONDALE) 869
- WILLIAM H. TAYLOR III (MONDALE) 870
- M. ELIZABETH SABIN (MONDALE) 871
- ALPHONSE C. GONZALES (MONDALE) 872
- TYWANDEE BUSH (MONDALE) 873

MONDALE ALTERNATES

- JEANNE P. QUINN (MONDALE) 896
- MICHAEL PENN (MONDALE) 897

MONDALE

THE REAL THING IS BETTER THAN A "NEW" IDEA

EXHIBIT 4

EXHIBIT 5



An Outstanding Record of Service And a Vision for the Future

Walter Mondale

Walter Mondale grew up with the family values of small-town rural America. His father was a minister, and his mother taught music; together, they taught Walter Mondale to speak the truth, to respect hard work, to cherish their faith, to respect our country and its laws, and to help others.

Walter Mondale went on to earn a degree from the University of Minnesota and after serving in the United States Army he earned a law degree on the G.I. Bill.

With Hubert Humphrey he worked hard to build the Democratic Farmer-Labor Party of Minnesota, and in 1960 he became the youngest state Attorney General in Minnesota history. He fought for consumers and was an early and effective leader in the struggle for civil rights and civil liberties.

In 1964 he became a United States Senator. In the Senate he fought for civil rights, voting rights, and for an end to discrimination in housing. He worked to improve education for all children, and to strengthen families with nutrition programs and day care centers. He fought for senior citizens and was one of the original sponsors of Medicare. As a member of the influential Finance Committee he fought for fairness and equity in our tax laws. He fought for passage of the Equal Rights Amendment, and wrote the nation's first comprehensive child care act (vetoed by Nixon) and designed the Women's Educational Equity Act. He was a co-sponsor of the Clean Air Act of 1970 and the Water Pollution Act of 1972. He opposed the Nixon plan to junk the ABM Treaty and put multiple warheads on nuclear missiles. And in 1976 he was a key author of the first Senate resolution to stop the proliferation of nuclear weapons.

In 1976 he was elected Vice President of the United States and became the most active and influential Vice President in history.

"I know how to shape a government. I know how to lead. I know how to defend this country. and I know how to search for peace.

"Americans want to be one strong nation. We're ready. We're ready. And we can!" Walter Mondale

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

Walter
Mondale



The
experience
to know
what needs
to change.

The
strength to
make
it happen.

8 5 0 4 0 5 0 4 4 1 2

The Economy—Key to Our Future

"The key to this nation's future is a healthy growing economy—an economy that provides jobs and opportunities for all Americans, and not just profits for the rich. We have to put people back to work. Without jobs, there is no fairness" – Walter Mondale

Here's how he'll do it:

• Cut Reagan's record red-ink deficits – and cut them fast – by:

Stopping the Pentagon's waste and foolish spending. We can't afford to pay $130 for a 4-cent part; we can't afford to buy billion-dollar weapons that don't work.

Putting limits on how much the doctors and the hospitals can gouge Medicare and Medicaid and the public. Nobody should have to pay $700 a day for a hospital room or $85 to walk into a doctor's office.



Making the rich pay their fair share of taxes like everybody else.

• Tell the Federal Reserve that we want monetary policies that make sense – that help people buy houses and cars and home appliances.

• Put people – millions of men and women – back to work the FDR did, and retrain workers who were abandoned when their jobs were sent to Taiwan or Singapore.

• Make pay equity a reality.

• Tell government and business and labor, we have to work together to rebuild the nation's basic industries. We have to work together and stand together; there's no other way.



• Rebuild our nation's roads and bridges and dams and waterlines. These make up our nation's physical foundation, so they have to be sound.

• Enforce the civil rights laws so that women and minorities have a fair chance to get and keep a good job.

• Give smaller, creative companies an even break instead of passing out all the goodies to the big corporations. Big business doesn't need public assistance.



• See to it that American exporters don't get shortchanged by other countries' unfair trading practices.

• Give family farmers a fighting chance against the giants of agribusiness.

• Bring the nation's governors and mayors together to forge a real partnership with the federal government to make this nation's cities good places to live.

War—or Peace?

"In this, the nuclear age of doomsday weapons, we have to do everything in our power to ensure peace. The most awesome responsibility of the President is not only to keep us strong so that we don't invite attack, but to use all of our physical and moral strength to keep the peace and spare the world from holocaust."
– Walter Mondale

What about global brinkmanship saber-rattling? What about our increasing military involvement in Central America? Here's what Mondale will do:

• Strengthen our regular military forces.

• Get back to dealing with smaller nations as a friend instead of as a bully.

• Restore our nation's open commitment to human rights as the cornerstone of American foreign policy.



• Help poorer nations stand on their own feet. Democracy will never grow in the soil of poverty, oppression, and despair.

• Attract the people of Central America with our values – instead of scaring them with our weapons.

And what about nuclear weapons? Here's what Mondale will do:

• Sit down with the Russians and work out a mutual and verifiable freeze on nuclear weapons.

• Send the Salt II treaty to the Senate and support its ratification.

• Bury the MX missile boondoggle once and for all.

• Stop wasting money on nerve gasses and other indiscriminate killers.

• Put this nation out front again in the effort to halt the spread of nuclear weapons – and the threat of doomsday blackmail.

Education—the Future of Our Children—the Future of Our Nation.

"Getting this nation's schools back on the track will be one of the top priorities of the Mondale Administration. Everything depends on strong schools and strong colleges: a healthy economy, a strong defense, social justice, opportunity for all. There is no reason whatsoever why the next generation of Americans cannot be the best educated and trained in this nation's history."
– Walter Mondale



Here's how Mondale will go about it:

• Establish a Fund for Excellence to help local schools do a better job of teaching children.

• Start an "Education Corps" to attract bright and dedicated young people to teaching careers, and help the teachers already in the classroom to sharpen their skills.

• Give the nation's laboratories, libraries, and research centers the support they must have.

• Start a crash effort to give our kids better training in math, science, and languages. That's where tomorrow's jobs will be.

• Strengthen programs for rural and inner-city schools to give poor children an even break.



• Make sure that every American family, and not just the wealthy few, can afford to send their kids to college.

• Create awards to help gifted graduate students complete their training.

• Stop the loss of talent that occurs because of discrimination and sex stereotyping in schools.

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Mondale for America

"I know how to shape a government. I know how to defend this country—and I know how to search for peace.

Americans want to be one strong nation. We're confident. We're ready.

And so am I."

ON MARCH 20th VOTE FOR

WALTER F. MONDALE

FOR PRESIDENT

AND ALL MONDALE COMMITTED DELEGATES AND ALTERNATES

(SAMPLE)

DELEGATES

☐ DELEGATE'S NAME (MONDALE)

ALTERNATES

☐ ALTERNATE'S NAME (MONDALE)

MONDALE

G. J. B. Kenny

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

Pd. for by Mondale for President, Inc.

1184

WALTER MONDALE



THE EXPERIENCE TO KNOW WHAT WE NEED TO CHANGE... THE STRENGTH TO MAKE IT HAPPEN

EXHIBIT 6

"America must be number one again 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 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.



EXHIBIT 7

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

MONDALE

ILLINOIS STATE CAMPAIGN: 30 W. Washington, Rm. 530, Chicago, 60602
(312)368-1984

CONTACT: Jim Margolis
(312)368-1984

FOR IMMEDIATE RELEASE: Wednesday, January 4, 1984

MONDALE CAMPAIGN ANNOUNCES

ILLINOIS DELEGATE SLATES

****

CHICAGO--Citing the "diversity and depth" of the delegate candidates committed to former Vice-President Walter F. Mondale, U.S. Congressman Daniel Rostenkowski (D-IL 8th) announced today the Mondale campaign's 1984 delegate slates for Illinois.

The House Ways and Means Committee chairman noted that the slates which have been developed by the campaign demonstrate the broadbased support Walter Mondale enjoys throughout the state's 22 congressional districts.

"The people you find here representing Fritz Mondale as delegate candidates are very simply the people of Illinois," said Rostenkowski. "They are young and old, black, white, and Hispanic. They are regular Democrats and independent Democrats, elected officials and women activists," continued Rostenkowski. "They are teachers, blue collar workers, professionals and farmers. Indeed, they represent the Democratic Party of the 80's."

Commenting that he could think of no previous campaign which had so successfully brought together such a variety of people, Rostenkowski noted their joint purpose..."defeating Ronald Reagan

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with the strength, intelligence, and integrity of Walter Mondale."

State Director of the Illinois Mondale effort, James Margolis, noted the difficulty the campaign had in determining the Mondale-pledged delegate slates:

"We had the good fortune of having literally hundreds of prospective delegate candidates anxious to represent Walter Mondale on the ballot," said Margolis. "Choosing between so many of the campaign's strongest supporters -- almost all of whom would have made outstanding delegates -- was one of the hardest tasks I have ever faced." Continuing, the Illinois Director stated that the "final product is first rate and we now have before us a group of men and women who I believe will carry us on to a strong victory 76 days from today."

(The 154 men and women who will run as Mondale-committed delegates and alternates to the Democratic National Convention will seek election during the March 20 Illinois Primary. In addition 78 delegates and 27 alternates will be selected "At Large" by the Democratic Caucuses of the United States Congress and the Democratic State Central Committee. Caucus selections will occur in late January, the State Central Committee will make it's choices in May.

A number of former Vice President Mondale's most prominient political supporters are expected to be seated at the National Convention either as Members of Congress, elected officials or Party officers. Thus, they are not necessarily represented on the slates being announced today.)

###

8504417

ATTACHMENT E

State of Pennsylvania)
City of Philadelphia)

A F F I D A V I T

KNOW ALL MEN BY THESE PRESENTS:

That I, Nicole Chambers, N.C. AKA: Josefina Rivera NC residing at 2130 Wallace Street, Philadelphia, Pennsylvania, Telephone: (215) 329-2726, being duly sworn, depose that:

1. On April 9, 1984, a little after 3:00 p.m., I went to the Mondale At-Large Delegate Committee office at 1420 Walnut Street Philadelphia, and volunteered to one of the people who seemed to be on the staff there to work for the Mondale Campaign. I talked to a girl named Wanda, not further identified, who said that since I was from Philadelphia and knew the city, that I could assist her in giving out supplies of campaign material to be distributed a little later that afternoon. Before leaving, she gave me a sample of those items which bear my initials "N.C." and the date "4/9" and are attached as Exhibits to this affidavit and are described as follows:

Exhibit 1: "Official MONDALE Delegate's Ballot" pertaining to the primary election on April 10, 1984, solicitng support for Mondale delegates and alternates to the Democratic National Convention from the Pennsylvania Second Congressional District. The bottom of the flyer was imprinted with: "Paid for by Second Congressional District Delegates for Mondale, "Anthony McNeil, Treasurer."

Exhibit 2: A flyer entitled "WALTER MONDALE CONFRONTS THE ISSUES: THREE-MILE ISLAND - WALTER MONDALE SAYS "NO" TO A RESTART OF TMI #1". At the bottom of

N.C.

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the flyer is the annotation "Paid for by the Mondale At-Large Delegate Committee."

Exhibit 3: Flyer entitled "WALTER MONDALE CONFRONTS THE ISSUES: ISRAEL AND THE MIDDLE EAST." At the bottom of the flyer is the annotation "Paid for by the Mondale At-Large Delegate Committee.:

Exhibit 4: Flyer entitled WALTER MONDALE CONFRONTS THE ISSUES: SENIOR CITIZENS HAVE A RELIABLE FRIEND IN WALTER MONDALE." At the bottom of the flyer is the annotation: "Paid for by the Mondale At-Large Delegate Committee."

Exhibit 5: A flyer entitled "WALTER MONDALE CONFRONTS THE ISSUES: JOBS AND THE ECONOMY - WALTER MONDALE STANDS FOR JOBS." At the bottom of the flyer is the annotation "Paid for by the Mondale At-Large Delegate Committee.:

Exhibit 6: A tabloid entitled "FIVE REASONS WHY PENNSYLVANIA NEEDS WALTER MONDALE..." The tabloid bears the instruction, "VOTE FOR MONDALE AT-LARGE DELEGATES" and bears the names of W. Wilson Goode, Richard S. Caliguiri, Ed Rendell, and Lou Tullio. The front of the tabloid bears the statement "Paid for by the Mondale At-Large Delegate Committee."

Exhibit 7: A flyer entitled "WALTER F. MONDALE ON CIVIL RIGHTS and CIVIL LIBERTIES." At the bottom of the flyer

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N.C.

is the annotation "Paid for By the At-Large Delegate Committee for Mondale."

Exhibit 8: A flyer in Spanish entitled, "MONDALE HA PROBADO SER UN AMIGO DE LOS HISPANOS." At the bottom of the flyer is the annotation in English "Paid for by the Mondale At-Large Delegate Committee.

Exhibit 9: A two-page flyer with the heading on the front "On Key Issues, Good Ideas Top 'New' Ideas'... Mondale tops Hart." The back of the flyer is headed "ISSUE...MONDALE.....HART." The flyers are noted to be issued by: "PENNSYLVANIA AFL-CIO COPE."

2. I went back to the Mondale At Large Delegate Committee at about 4:30 and assisted "Wanda" until about 6:00 PM with distribution of packets of the material described above to different areas of Philadelphia depending on the individuals who came in to distribute it and the area to which it was going to be distributed. The people coming in to get the material all seemed to be volunteers and, for the most part, were high school or college age young adults.

WITNESS THE FOLLOWING Signature: Nicole Chambers
Josefina Rivera

Nicole Chambers AKA: Josefina Rivera

State of Pennsylvania)
County of Phila)

I, Robert J. Wescott, a Notary Public in and for the County aforesaid, in the State of Pennsylvania, do hereby certify that Nicole Chambers, whose name is signed to the foregoing affidavit, personally appeared before me in my County aforesaid and swore and acknowledged the same this 17 day of May 1984.

ROBERT J. WESCOTT, JR.
Notary Public, Phila., Phila. Co.
My Commission Expires Feb. 23, 1987

Robert J. Wescott
Notary Public

My Commission expires on the 23 day of Feb, 1987.

8504204

EXHIBIT 1

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**
179 Herman **WOODEN**
184 Ann J. **LAND**
185 Arnold C. **STORR**

ALTERNATE DELEGATE

195 Dennis C. **WHITE**
197 Jeffrey D. **MORAN**
199 Leslie B. **KERNODLE**

Paid for by Second Congressional Delegates for Mondale
Jeffrey Michel, Treasurer

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EXHIBIT 2

WALTER MONDALE CONFRONTS THE ISSUES:

THREE MILE ISLAND

WALTER MONDALE SAYS "NO" TO A RESTART OF TMI #1





Five years ago, the nation suffered through a nightmare that lasted a week. But for the people of Central Pennsylvania, the nightmare has never ended. And today all Americans must realize that what happened at TMI—the most serious accident in our 27 years of commercial nuclear power—could happen again . . . anywhere and anytime.

TMI changed lives forever. Here it has left parents with doubts about the health of their children; it has sown fear about the quality of your air and water; it has left families uncertain whether to risk having children at all. TMI has diminished our confidence in the ability of public utilities to serve the public interest—and the ability of public servants to guard it.

The run-around has gone on long enough. After five years, there's still no clean-up at the plant—despite all of industry's promises. And in Washington, the investigators still haven't gotten to the bottom of the mess. There are many unanswered questions about the accident itself: Did Metropolitan Edison falsify data? Were illegal shortcuts taken in the clean-up? Did General Public Utilities try to shift the blame? Did GPU try to cover up critical consultants' reports?

These are crucial questions which bear directly on the safety of the nuclear plant, the integrity and reliability of management and the lives of the people who live nearby. But we don't have the answers—and if the Nuclear Regulatory Commission has its way, we may never know.

The answers to our questions shouldn't be satisfactory only to Metropolitan Edison or the NRC or the Reagan Administration—they must be satisfactory to the people who live and work near TMI and to the American people.

VOTE FOR

MONDALE

SUPPORT THE MONDALE AT-LARGE DELEGATES

Paid for by the Mondale At-Large Delegate Committee

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EXHIBIT 3

WALTER MONDALE CONFRONTS THE ISSUES:

ISRAEL & THE MIDDLE EAST



Israel and the Middle East: Walter Mondale's record in the U.S. Senate is second to none in support of Israel, and he has worked hard to prevent the sale of weapons to Arab nations. As Mayor Ed Koch of New York City says, "On the issue of Israel's security, there is no one who comes close to Walter Mondale."

Vice President Walter Mondale demonstrated this commitment in 1978 when he traveled to the Middle East and got the peace process moving between Egypt and Israel, helped persuade Begin and Sadat to negotiate face to face, and played a critical role in the success of the Camp David talks.

Walter Mondale holds these principles for peace in the Middle East:

- continue to insist that we will neither recognize nor negotiate with the PLO until it first recognizes the State of Israel, abandons terrorism and accepts the terms of UN resolutions 242 and 338
- remain committed to a Jerusalem united forever with free access to the holy places
- no sales of sophisticated military equipment to Israel's neighbors which could disrupt the military balance and impair the security of Israel
- the leaders of the other Arab nations must follow Sadat's lead and sit down face-to-face with Israel at the bargaining table

VOTE FOR

MONDALE

SUPPORT THE MONDALE AT-LARGE DELEGATES

RL 4/9

Paid for by the Mondale At-Large Delegate Committee

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EXHIBIT 4

WALTER MONDALE CONFRONTS THE ISSUES:

SENIOR CITIZENS HAVE A RELIABLE FRIEND IN WALTER MONDALE





Throughout his 20 years of public service—especially as a U.S. Senator and as Vice President—Walter Mondale has protected and promoted the interests of elderly Americans. That's only one reason why some of the most respected and effective senior citizens organizations have embraced the Mondale campaign. They know that as President, Walter Mondale will keep his commitment to:

- ensure the long-term integrity of the Social Security system so that the social compact honored by generations of Americans will not be broken
- expand Medicare and Medicaid to meet the health needs of the elderly
- get tough with the soaring costs of health care—contain these costs with legislation which simultaneously protects the quantity and quality of health care for the elderly
- abolish mandatory retirement for older men and women who want to remain in their jobs and careers
- adopt and enforce adequate regulations to ensure the safety and dignity of older Americans who reside in nursing homes

VOTE FOR

MONDALE

SUPPORT THE MONDALE AT-LARGE DELEGATES

RL 4/9 4/3

Paid for by the Mondale At-Large Delegate Committee

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EXHIBIT 5

WALTER MONDALE CONFRONTS THE ISSUES:

JOBS & THE ECONOMY

WALTER MONDALE STANDS FOR JOBS:





Walter Mondale understands that the first priority in any successful Presidency is for Americans to have productive jobs. Pennsylvanians have been hit hard economically in the past four years—and they need a hard-hitting friend in the White House: Walter Mondale. With unemployment already at severe levels in steel and other basic industries across the state, another 350 jobs were lost early this month when the U.S. Steel plant closed in Johnstown—and yet another 3,800 steelworkers are to be laid-off by the end of April. Jobs have been cut in half at the Volkswagen plant in New Stanton—down to 2,500.

Walter Mondale has an aggressive plan to preserve and create jobs for Pennsylvania and the rest of America by:

- ensuring economic growth by slashing the incredible federal budget deficits and restoring sensible fiscal policies in Washington
- adopting a more aggressive trade policy—including matching other countries' export subsidies product for product and dollar for dollar—in order to persuade them to reduce these unfair subsidies
- promoting a full-employment policy aimed at ensuring jobs for all who want to work—especially young Americans who are hardest hit by unemployment
- revitalizing basic industries—including steel and automobiles—and creating incentives for reinvestment in existing plants
- investing more in training, retraining and education for coping with technological change and a more competitive world economy
- enacting tough plant-closing legislation to stem the flow of jobs to foreign countries with cheap labor

As Vice President, Walter Mondale took an active role in promoting the loan guarantee program for Chrysler in 1979, which saved 300,000 Chrysler jobs and 20,000 companies dependent on Chrysler. But Gary Hart voted firmly against it.

When the Wheeling-Pittsburgh Steel Co. needed loans in 1979 to open up a steel rail plant outside of Pittsburgh and remain competitive, Walter Mondale rallied to their support. But Senator Gary Hart was one of only six Democrats who voted against the loans needed by Wheeling-Pittsburgh, claiming "it is the worst possible form of government in the workplace. It is in fact a form of private socialism."

Walter Mondale supports domestic-content legislation aimed at creating and preserving jobs that otherwise would be lost to imports. But Gary Hart opposes this sorely needed assistance.

VOTE FOR

MONDALE

SUPPORT THE MONDALE AT-LARGE DELEGATES

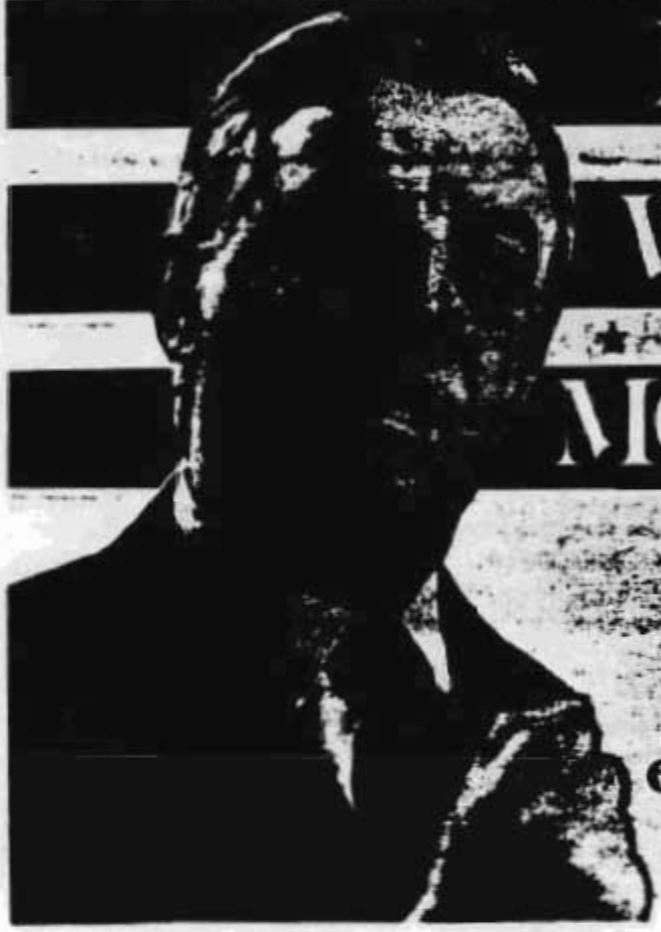
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Paid for by the Mondale At-Large Delegate Committee

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EXHIBIT 6

FIVE REASONS WHY PENNSYLVANIA NEEDS WALTER MONDALE



VOTE for
MONDALE DELEGATES
ON TUESDAY, APRIL 10th

Paid for by the Mondale At-Large Delegate Committee

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1. JOBS & THE ECONOMY

Walter Mondale Stands for Jobs

Walter Mondale understands that the first priority in any successful Presidency is for Americans to have productive jobs. Pennsylvanians have been hit hard economically in the past four years—and they need a hard-hitting friend in the White House: Walter Mondale. With unemployment already at severe levels in steel and other basic industries across the state, another 350 jobs were lost early this month when the U.S. Steel plant closed in Johnstown—and yet another 3,800 steelworkers are to be laid-off by the end of April. Jobs have been cut in half at the Volkswagen plant in New Stanton—down to 2,500.

Walter Mondale has an aggressive plan to preserve and create jobs for Pennsylvania and the rest of America by:

- ensuring economic growth by slashing the incredible federal budget deficits and restoring sensible fiscal policies in Washington
- adopting a more aggressive trade policy—including matching other countries' export subsidies product for product and dollar for dollar—in order to persuade them to reduce these unfair subsidies
- promoting a full-employment policy aimed at ensuring jobs for all who want to work—especially young Americans who are hardest hit by unemployment
- revitalizing basic industries—including steel and automobiles—and creating incentives for reinvestment in existing plants
- investing more in training, retraining and education for coping with technological change and a more competitive world economy
- enacting tough plant-closing legislation to stem the flow of jobs to foreign countries with cheap labor



As Vice President, Walter Mondale took an active role in promoting the loan guarantee program for Chrysler in 1979, which saved 300,000 Chrysler jobs and 20,000 companies dependent on Chrysler. But Gary Hart voted firmly against it.

When the Wheeling-Pittsburgh Steel Co. needed loans in 1979 to open up a steel rail plant outside of Pittsburgh and remain competitive, Walter Mondale rallied to their support. But Senator Gary Hart was one of only six Democrats who voted against the loans needed by Wheeling-Pittsburgh, claiming "it is the worst possible form of government in the marketplace. It is in fact a form of private socialism."

2. SENIOR CITIZENS

Walter Mondale Stands for Senior Citizens

Throughout his 20 years of public service—as especially as a U.S. Senator and as Vice President—Walter Mondale has protected and promoted the interests of elderly Americans. That's only one reason why some of the most respected and effective senior citizens organizations have embraced the Mondale campaign. They know that as President, Walter Mondale will keep his commitment to:

- ensure the long-term integrity of the Social Security system so that the social compact honored by generations of Americans will not be broken
- expand Medicare and Medicaid to meet the health needs of the elderly
- get tough with the soaring costs of health care—contain these costs with legislation which simultaneously protects the quantity and quality of health care for the elderly
- abolish mandatory retirement for older men and women who want to remain in their jobs and careers
- adopt and enforce adequate regulations to ensure the safety and dignity of older Americans who reside in nursing homes



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3. FOREIGN POLICY

Walter Mondale Will Bring Us A SAFER WORLD

As the most active Vice President in the history of the office, Walter Mondale is more experienced in foreign policy and running the federal government than any candidate for the Presidency—including Ronald Reagan. He was the first candidate to support the nuclear freeze—and as President he will immediately act to negotiate with the Soviet Union and lead us back from the brink of nuclear peril. His foreign policy is focused on:

Israel and the Middle East: Walter Mondale's record in the U.S. Senate is second to none in support of Israel, and he has worked hard to prevent the sale of weapons to Arab nations. As Mayor Ed Koch of New York City says, "On the issue of Israel's security, there is no one who comes close to Walter Mondale."

Vice President Walter Mondale demonstrated this commitment in 1978 when he traveled to the Middle East and got the peace process moving between Egypt and Israel, helped persuade Begin and Sadat to negotiate face to face, and played a critical role in the success of the Camp David talks.

Walter Mondale holds these principles for peace in the Middle East:

- continue to insist that we will neither recognize nor negotiate with the PLO until it first recognizes the State of Israel, abandons terrorism and accepts the terms of UN resolutions 242 and 338
- remain committed to a Jerusalem united forever with Free access to the holy places
- no sales of sophisticated military equipment to Israel's neighbors which could disrupt the military balance and imperil the security of Israel
- the leaders of the other Arab nations must follow Sadat's lead and sit down face-to-face with Israel at the bargaining table

Central America: Walter Mondale's objective in Central America is clear. First, we must achieve an agreement for mutual non-intervention by all outside interests, and second, achieve a mutual withdrawal of forces. America must let the people of Central America work out their own histories.

As President, Mondale would reduce the number of U.S. troops in Honduras, but before totally withdrawing them he would seek to negotiate an agreement with Nicaragua to

- remove any and all Cuban forces there
- ban the use of MIGs in the area
- secure an enforceable agreement on non-intervention.

Europe: Walter Mondale has pledged to keep faith with our European allies and as President he will not reduce the United States' troop commitment in Europe. He also would help America's allies preserve their access to Persian Gulf oil.

4. THE STATE & THE CITIES

Walter Mondale is a Friend of Pennsylvania and our cities

Throughout his political career, Walter Mondale has been a forceful advocate of America's cities—that's one reason why the mayors of Philadelphia, Pittsburgh, New York, Los Angeles, San Francisco, Seattle, Miami, San Antonio and many other cities have warmly endorsed Walter Mondale.

Those men and women appreciate Walter Mondale's pledges to restore funding to the federal programs—Medicare, child nutrition, day care, mass transit assistance and housing aid—which have been ravaged by the Reagan budget cuts. And those whose backing can turn the gridlock differences between Walter Mondale and Gary Hart—especially Mondale's greater concern for education and the cities, and his more realistic and developed leadership capacity. They know that Walter Mondale is committed to

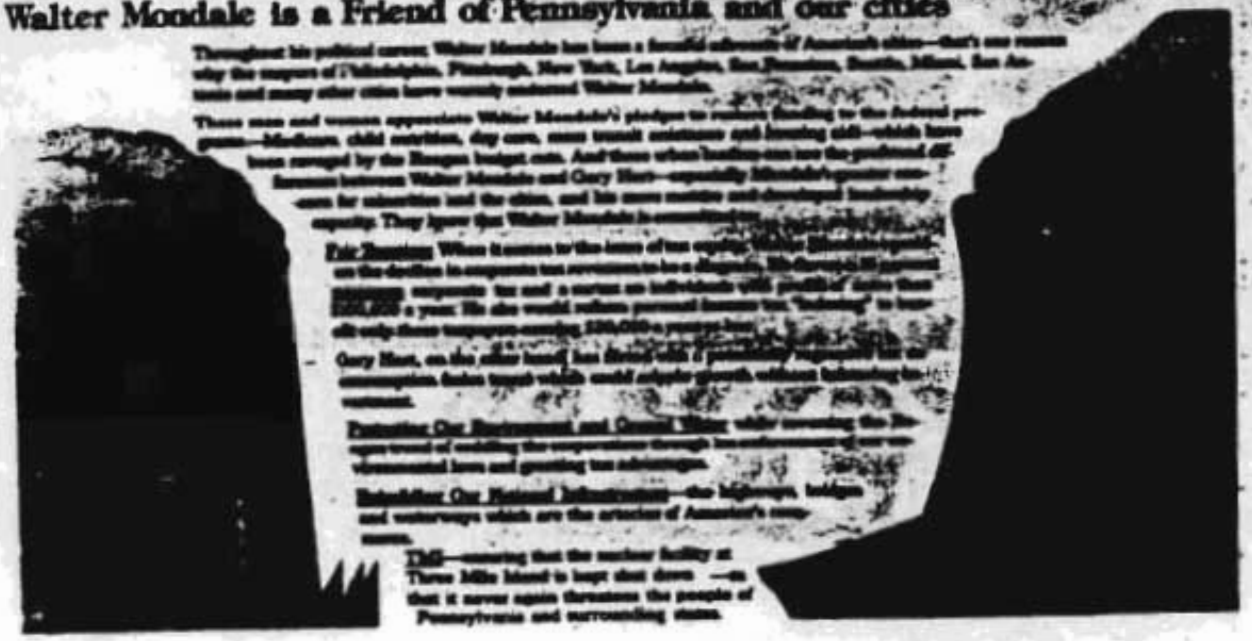
Fair Taxation: When it comes to the issue of tax equity, Walter Mondale's opponent is on the decline in corporate tax revenues to be a disgrace. He favors a 15 percent minimum corporate tax and a surtax on individuals with profits of more than $[illegible] a year. He also would reform personal income tax "indexing" to benefit only those taxpayers earning $20,000 a year or less.

Gary Hart, on the other hand, has devised what I personally regard as the most unfair consumption duties (taxes) which could cripple growth without balancing the economy.

Protecting Our Environment and Coastal Water while reversing the Reagan trend of enabling the corporations through lax enforcement of our environmental laws and granting tax advantages.

Rebuilding Our National Infrastructure—the highways, bridges and waterways which are the arteries of America's economy.

TMI—ensuring that the nuclear facility at Three Mile Island is kept shut down —so that it never again threatens the people of Pennsylvania and surrounding states.



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5. GOOD IDEAS VS "NEW IDEAS"

Walter Mondale Knows the Difference



Here is a sampling of some of Senator Gary Hart's new ideas. Take a good look, Pennsylvania.

- More than $1000 a year should be deducted from the individual paychecks of working men and women to be placed in government accounts—so that if they lose their jobs they can withdraw from the account to pay for retraining or further education.
- College students ought to pay interest on student loans—while they are still in college.
- A fee of $30 per barrel should be imposed on all oil imported into the U.S. The consequential Families in the Northeast—where so much imported oil is consumed—who heat with oil would pay at least $250 more each year in heating costs and another $650 more in gasoline costs. Prices paid by the average family for goods and services would rise by $300.
- Employers should be allowed to pay less than the minimum wage (55 percent) to young men and women who want jobs under the age of 20.
- The nuclear arms "build-down", which Gary Hart co-sponsored in the Senate more than a year ago and still endorses, was designed by Republicans to undermine the nuclear freeze movement. The "build-down" would allow one new high-technology nuclear weapon to be built for every two "old" weapons destroyed.

Why Mondale will defeat Ronald Reagan in November:

- Mondale's experience and proven leadership
- Mondale's personal and political values
- Mondale's broad-based national support

Walter Mondale is the one candidate with the experience and leadership to move America in the right direction as we approach the 1990's.

What really matters to Pennsylvanians in the April 10th primary—as it should in all elections—are the issues of principle, policy and character. Unlike his opponents, Walter Mondale is an experienced leader who knows himself and what he believes in. Walter Mondale doesn't see an "overnight sensation"—he is rooted firmly in a political tradition of government which serves people.

Ask yourself: which of the Democratic candidates you would rather have sitting across the table from the new Soviet leader in arms control talks?

Ask yourself which Democratic candidate would get America's full manpower behind creating and preserving jobs in our countries basic industries such as steel and autos?

The answer is Walter Mondale. During his long career of public leadership, Mondale has worked at every level of government—from the statehouse as Minnesota Attorney General to the U.S. Senate and the White House as Vice President.

Mondale will quit blaming the government for America's problems and will start leading it to solve them.

As a major newspaper editorial writer in New York City concluded a few days ago, in the face of sudden voter interest in Gary Hart, "Walter Mondale has not tolerated his echo—but continued to sail against the wind. We think he has chosen the course of principle—confident by November the voters victimized by Reaganism can constitute a landslide behind him."

VOTE FOR

MONDALE

AT LARGE DELEGATES

W. WILSON GOODE RICHARD S. CALIGUIRI ED RENDELL LOU TULLIO

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EXHIBIT 7



WALTER F. MONDALE ON CIVIL RIGHTS AND CIVIL LIBERTIES

MONDALE'S RECORD AS UNITED STATES SENATOR

- Mondale was an original cosponsor of the historic Voting Rights Act of 1965 and spoke out strongly against all attempts to weaken it during Senate debate.
- He introduced sweeping fair housing legislation in 1967 and 1968. After prolonged filibuster and cloture fights, this landmark legislation was enacted into law.
- As Chairman of the FBI Subcommittee of the Select Committee on Intelligence, he personally investigated the Bureau's vendetta against Martin Luther King Jr.
- Proclaiming in 1970 that "I would rather lose my public career than give up on civil rights," Mondale became a leading defender of the federal judiciary's constitutional right to employ busing as a method of desegregating schools.

VOTE

LOOK BEYOND THE SLOGANS TO THE ISSUES...VOTE

MONDALE

and MONDALE DELEGATES

MATTHEW DAVIS	ROSALEE GEORGE	PATRICIA S. HALPIN
ANN J. LAND	FRED LUKE	BLONDELL REYNOLDS
DORIS A. SMITH	ARNOLD STORR	HERMAN WOODEN
LESLIE B. KERNODLE, ALT.	JEFFREY MORAN, ALT.	DENNIS WHITE, ALT.

AND AT-LARGE DELEGATES

Paid for by the At-Large Delegate Committee for Mondale

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EXHIBIT 8

MONDALE HA PROBADO SER UN AMIGO DE LOS HISPANOS





A través de sus 25 años de servicio publico. Walter Mondale ha trabajado para proteger y promover los intereses de los hispanos. Walter Mondale fue el principal defensor de la ley que fomentara y aumentaria el numero de votantes hispanos, y de mujeres y hombres en cargos politicos en el gobierno.

Walter Mondale comprende las necesidades de los hombres, mujeres y niños hispanos y como Presidente el seguira siendo nuestro defensor en areas tan importantes como:

TRABAJOS: Walter Mondale se ha comprometido a restaurar nuestras industrias básicas, las cuales ayudarán a nuestros obreros en todos los niveles de la economia, creando el entrenamiento apropiado para los trabajadores que hayan perdido sus trabajos, y una agresiva poliza de comercio que proteja, y cree nuevas fuentes de trabajo a traves del pais.

EDUCACIÓN: Cuando Walter Mondale era Senador, apoyo y ayudo para que la educación bilingue llegara a nuestras escuelas. El cree que nuestro sistema educacional es uno de los problemas más importantes, y esta decidido a restaurar las reducciones de Reagan en las escuelas y asegurar que nuestros hijos tengan una educacion universitaria.

PERSONAS MAYORES: (Ancianos) Walter Mondale es uno de los defensores originales del Medicare y Medicaid, y se ha mantenido firme contra las crueles propuestas de la administración de Reagan de cortar la ayuda social a los ancianos y a los pobres.

El ampliará estos programas de ayuda y tambien esta dedicado ha protejer el seguro social. (Social Security).

INTERESES: Ha sido siempre un sueño para todos los americanos de tener su casa propia. Ronald Reagan nos ha negado este sueño, y a nosotros hijos, creando una situacion economica que los intereses "suban por las nubes" Y haga el sueño de comprar una casa fuera de nuestro alcance económico. MONDALE urge que se aumenten los fondos para construir casas de vivienda que puedan ser compradas por las familias de ingresos bajos o moderados.

VOTA POR

MONDALE

Y POR LOS DELEGADOS DE MONDALE

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EXHIBT 9

On Key Issues, Good Ideas Top 'New Ideas'... Mondale Tops Hart

Following is a comparison of the records of Walter Mondale and Gary Hart, the two leading candidates for the Democratic nomination, on eight key issues for working people and their families.

The comparison shows clearly that in concern for the well-being of average Americans, on the basis of record and program and a vision of what America can be, Walter Mondale's "good idea" candidacy holds out vastly more promise, and is fairer, than Gary Hart's "new idea" candidacy.

ISSUE	MONDALE	HART
Jobs, the economy	Proposes full employment law with teeth in it, policies that protect, expand jobs: revival of basic industries; trade that increases rather than costs U.S. jobs; rebuilding roads, bridges, ports, transport systems; lower interest rates; tax justice that obliges corporations, rich individuals to pay fair share.	Voted against jobs for U.S. auto workers in opposing Chrysler loan; opposes domestic content bill; opposed designating some defense contracts for high jobless areas; espouses "free trade" in a world where it's a myth, while hundreds of thousands of U.S. workers lose jobs to unfair foreign competition.
Help for the jobless	As Senator, consistently supported improved, extended benefits for jobless workers. Backs special aid for workers displaced by imports.	Backed Reagan cuts in special help for thousands of workers displaced by imports. Voted to force jobless workers to accept any "reasonable" job, including minimum wage.
Trade	Would make trade a two-way street helping U.S. workers and industries as well as our trading partners. Insists they remove barriers to U.S. products to encourage real free flow of goods.	Voted against "buy American" proposal in government-funded public works, denying U.S. workers benefit in terms of jobs from funds put up by U.S. taxpayers. No call to trading partners to remove barriers to U.S. goods.
Job Safety/ Health	Sponsored, fought for, voted for original job safety/health law; urges strengthening law and its enforcement.	Has voted at least four times in U.S. Senate to weaken job safety/health law and/or reduce its coverage.
Taxes	Would close loopholes for corporations, wealthy individuals; revoke most of huge Reagan tax hand-outs to rich; impose heavier windfall profits tax on Big Oil. Over-all, would seek to oblige corporations and the rich to pay fair share of tax burden, as workers always have.	Calls for so-called "consumption tax" under which you pay taxes based on what you buy. If most of your income is for necessities, you'd pay higher percentage than coupon-clippers. Voted **against** adequate tax on windfall oil profits.

Vote — Your Job Depends On It

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FRONT

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ISSUE	MONDALE	HART
Housing	Urges increased funding to construct homes within financial reach of low and middle income families.	In Senate, has voted several times to **deny adequate funding** for low and middle income housing.
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.
Youth	Opposes slashing minimum wage for teenagers because it invites employers to fire adult workers, hire lower-paid youth; backs generous low interest college loans and to permit recipients to begin payment upon graduation.	Voted for sub-minimum wage revolving door scheme (adults out, lower-paid youth in); voted to make recipients of Federal college loans pay additional interest.

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Mondale: A Good Idea of What America Can Be

VOTE MONDALE

Democratic Primary

Vote for a Better Tomorrow!

PENNSYLVANIA AFL-CIO COPE

JULIUS UEHLEIN
Chairman

ROBERT McINTYRE
Director

JUDITH HEH
Secretary/Treasurer

PENNSYLVANIA CHARTERED AFL JUNE • 1968 AFL-CIO

BAJ

ATTACHMENT F

STATE OF PENNSYLVANIA)
CITY OF PHILADELPHIA)

A F F I D A V I T

KNOW ALL MEN BY THESE PRESENTS:

THAT I, DONALD B. PRIESTLEY, residing at 3402 "G" Street, Philadelphia, Pennsylvania, 19134, Telephone: (215) 426-4618, an investigator for twenty-five (25) years, being duly sworn, depose that:

1. On April 9th and 10th, 1984, in connection with an investigation of possible violations by organized labor of Federal Election Commission (FEC) Regulations related to the U.S. Presidential primary campaign, I went to the Democratic Party of Upper Darby, Pennsylvania office which is in the Pennsylvania Seventh Congressional District, and located at 7016 Terminal Square, Upper Darby, Pa. as a volunteer to work on behalf of Senator Mondale's Presidential campaign.

2. Although the office is at Upper Darby Democratic office, it seemed that mostly all of the activities and posters were on behalf of Mondale.

3. On April 9th, I was in the office approximately two hours in the afternoon. While in the office, I was on the ground floor, but from the activities and voices I heard, the Mondale staffers and workers seemed to be working more out of the loft area to which I did not gain access. The only persons on the ground floor were a "Bob" and an "Obbie" who just seemed to be volunteers who were manning the office. The only activity that really seemed to be occurring was incoming

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telephone calls asking about transportation to the polls on April 10th, and Bob seemed to be handling that activity. There was some discussion that vans and other vehicles were going to be obtained to pick up people who would vote for Mondale, but I could not determine any further details of the arrangements except that callers were told to call the Democratic Committee at 352-5221 on April 10th for assistance. Before I left the office, I was asked to assist on April 10th if I would be available.

4. On April 10th, 1984 I went to the Democratic Party of Upper Darby office at about 6:00 a.m. to volunteer to assist. I remained until about 9:45, and during the time I was at the office, I identified the following individuals in the office:

a. Cathy Tuttillo (phonetic), a white female probably in her twenties, about 5'8" tall, about 125-130 pounds with shoulder length, auburn hair. She appeared to be a Mondale staffer as opposed to a volunteer, especially in the way that she associated with Mike Hackman, described in "b" below and the man described in "c" below, whom I also believe to be Mondale staff people. She was the one who had the key and unlocked the office at about 6:30 a.m. There was some discussion between Tuttillo and the man described in "c" below as to when and where they would be going after the Pennsylvania election. From the conversation, it seemed that they were each going different places and that one of them, I believe it to have been Tuttillo, was going to Texas.

b. Mike Hackman (phonetic). He is a white male, probably about twenty-five years of age, about 6' tall and approximately 155-160 pounds and having dark hair and a mustache. He arrived at about 8:30 and seemed to be a Mondale staff person, especially by the way he greeted Cathy Tuttillo upon her arrival and the manner in which he conversed rather privately with the man described in "c" below, both of whom I believe to be Mondale staffers. From the general conversation, it was apparent he did not reside locally. He answered the phones and was quite active in the office, but it did not necessarily seem as though he was in charge.

c. A white male, whose name I do not know, approximately 45-50 years of age, 5'8", 145-150 pounds, slight build with grayish hair, glasses and wearing a gray suit, came into the office sometime after 9:00. He seemed to be the one in the office treated with the most deference and seemed to be the one making decisions. While in the office, he received one phone call, after which he made the statement that it was from "Center City," but I did not overhear any of the conversation. By conversation with Cathy Tuttillo as to where and when they would be going after the Pennsylvania election, and from the manner in which he spoke to Tuttillo and Mike Hackman, I believe that he did not reside locally, and was a paid Mondale staff person. He seemed to be rather well acquainted with "Randy," described in "e" below, and spoke to him inside and outside the office. When he left the office, he said he was going to South Philadelphia and there was some conversation that

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although violence had been threatened in connection with a congressional race in South Philadelphia during the election, that it was hoped there would be none.

d. A "Mondale Delegate," whose name I do not know, arrived at about 8:30 a.m. He wore a white metal badge with "Mondale" imprinted thereon and with two blue ribbon streamers attached to it and the printing "DELEGATE" on a streamer. He is a white male about 6'2", about 210-220 pounds, in his mid-thirties with brown hair and full beard. I saw him driving a new red Ford Thunderbird model car. I observed him in a rather private conversation with the man described in "c" above.

e. "Randy," a white male whose last name I do not know but who is approximately 35-36 years of age, about 5'9" tall, with dark hair and who is heavy set, wore sun-glasses but carried them in his hand while in the office, arrived about 9:00 a.m. He was greeted by the man in "c" above who said "How are you doing Randy?" He stayed in the office between twenty minutes and one-half hour and while in the office, he talked to everyone there, but more so with the older male described in (c) above both outside on the sidewalk and also inside in a corner of the office. Also, the man described in "c" above, upon parting, said to Randy: "See you at the party tonight." To my question as to who this individual was after his departure, someone replied: "That was Randy." Although I subsequently determined from news accounts that a Randy Canale is the president of the Delaware County Pennsylvania AFL-CIO Council, and that Upper Darby is located in

8504437

Delaware County, I could not determine whether the individual identified as "Randy" was the same as Randy Canale.

WITNESS THE FOLLOWING Signature:

Donald B. Priestley
DONALD B. PRIESTLEY

STATE OF PENNSYLVANIA)
COUNTY OF PHILADELPHIA) To-Wit:

I, Janice D. Roberts, a Notary Public in and for the County aforesaid, in the State of Pennsylvania, do hereby certify that Donald B. Priestley, whose name is signed to the foregoing Affidavit, personally appeared before me in my County aforesaid and swore and acknowledged the same this 14 day of May, 1984.

Janice D. Roberts
Notary Public

My Commission expires on the 26 day of October, 1987.

8504044330

STATE OF PENNSYLVANIA)
CITY OF PHILADELPHIA)

A F F I D A V I T

KNOW ALL MEN BY THESE PRESENTS:

THAT I, JAMES P. CARINO, III, residing at 1142 Stony Lane, Gladwyne, Pennsylvania 19035, Telephone: (215) 525-1219, a private investigator for six (6) years, being duly sworn, depose that:

1. On April 7, 1984, in connection with an investigation of possible violations by organized labor of Federal Election Commission (FEC) Regulations during the U.S. Presidential primary campaign, I went to the Democratic Party of Upper Darby, Pennsylvania office which is in the Pennsylvania Seventh Congressional District and located at 7016 Terminal Square, Upper Darby, Pa.

2. Although the office is the Upper Darby Democratic office, it seemed that all of the activities and posters were on behalf of Mondale. While in the office, I was on the ground floor, but from the activities and voices I heard, it seemed to me that Mondale people seemed to be working more out of the loft area to which I did not gain access.

3. While in the office, I met a young man sitting at a table who was in his mid-twenties, about 5'10", with dark hair and a mustache whom I later identified as Mike Hackman. He said he was a paid Mondale campaign organizer and said he had also been a Mondale staffer during the New Hampshire

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presidential primary campaign. He explained that he had sent a resume to the Mondale campaign in Washington, D.C. and one day they called him and sent him to work in New Hampshire. He said that he was paid for being a staff person, but inferred that his wages were relatively low. He did not specifically say who was paying him. I noted that Hackman was wearing a gold pin in the shape of a map of Pennsylvania with the name "Mondale" printed in black thereon, which may have been indicative of his being a staff person as opposed to a volunteer.

4. Also sitting at the table with Mike Hackman was a young woman in her early twenties, rather heavy set, with dark blond curley hair and freckles, but whose name I do not know. She was wearing a "Mondale" pin like Mike Hackman. It seemed like she wanted to talk and answer my questions but seemed to be discouraged by an Alternate Mondale Delegate (described below) who seemed to take over the answering of questions. I gained the impression from this girl that if she were a paid staff person for Mondale, that she lived locally.

5. Also, I met a Mondale Alternate Delegate who I subsequently determined by deduction was Mary Baulis, as that was the only Alternate Delegate listed on a sample ballot for Mondale Delegates in the Pennsylvania Seventh Congressional District. She made the statement that she and all the delegates were "receiving union support," and she showed me a Mondale flyer they were using that said "Labor Donated",

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attached hereto as Exhibit 1. I was in the office when she departed with campaign literature that she said she was distributing door to door, but only to registered Democratic voters, and she showed me a listing of those voters, which she was taking with her.

6. Mike Hackman made the statement that the Delegates in that area were well organized and well motivated workers and that there was also a good core of volunteers helping. He cited, as an example, the young adults whom I also observed, who seemed to be the age of High School Seniors and who came into the office to get supplies of Mondale campaign literature and then depart to distribute it.

WITNESS THE FOLLOWING Signature:

James P. Carino III
JAMES P. CARINO, III

STATE OF PENNSYLVANIA)
COUNTY OF PHILADELPHIA) To-Wit:

I, Janie D. Roberts, a Notary Public in and for the County aforesaid, in the State of Pennsylvania, do hereby certify that James P. Carino, III, whose name is signed to the foregoing Affidavit, personally appeared before me in my County aforesaid and swore and acknowledged the same this 11 day of May, 1984.

Janie D. Roberts
Notary Public

My Commission expires on the 26 day of October, 1987

8504050441

Mondale For President For Pennsylvania

The Economy—Key to Our Future

"The key to this nation's future is a healthy growing economy—an economy that provides jobs and opportunities for all Americans, and not just profits for the rich. We have to put people back to work. Without jobs, there is no fairness"—Walter Mondale

Here's how he'll do it:

• Cut Reagan's record red-ink deficits—and cut them fast—by:

Stopping the Pentagon's waste and foolish spending. We can't afford to pay $110 for a 4-cent part; we can't afford to buy billion-dollar weapons that don't work.

Putting limits on how much the doctors and the hospitals can gouge Medicare and Medicaid and the public. Nobody should have to pay $700 a day for a hospital room or $65 to walk into a doctor's office.



Making the rich pay their fair share of taxes like everybody else.

• Tell the Federal Reserve that we want monetary policies that make sense—that help people buy houses and cars and home appliances.

• Put people—millions of men and women—back to work like FDR did, and retrain workers who were abandoned when their jobs were sent to Taiwan or Singapore.

• Make pay equity a reality.

• Tell government and business and labor, we have to work together to rebuild the nation's basic industries. We have to work together and stand together; there's no other way.



• Rebuild our nation's roads and bridges and dams and waterlines. These make up our nation's physical foundation, so they have to be sound.

• Enforce the civil rights laws so that women and minorities have a fair chance to get and keep a good job.

• Give smaller, creative companies an even break instead of passing out all the goodies to the big corporations. Big business doesn't need public assistance.



• See to it that American exporters don't get short-changed by other countries' unfair trading practices.

• Give family farmers a fighting chance against the giants of agribusiness.

• Bring the nation's governors and mayors together to forge a real partnership with the federal government to make this nation's cities good places to live.

"I know how to shape a government. I know how to lead. I know how to defend this country—and I know how to search for peace.

"In this, the nuclear age of doomsday weapons, we have to do everything in our power to ensure peace. The most awesome responsibility of the President is not only to keep us strong so that we don't invite attack, but to use all of our physical and moral strength to keep the peace and spare the world from holocaust."
—Walter Mondale

What about global brinksmanship saber-rattling? What about our increasing military involvement in Central America? Here's what Mondale will do:

• Strengthen our regular military forces.

• Get back to dealing with smaller nations as a friend instead of as a bully.



• Restore our nation's open commitment to human rights as the cornerstone of American foreign policy.

• Help poorer nations stand on their own feet. Democracy will never grow in the soil of poverty, oppression, and despair.

• Attract the people of Central America with our values—instead of scaring them with our weapons.

And what about nuclear weapons? Here's what Mondale will do:

• Sit down with the Russians and work out a mutual and verifiable freeze on nuclear weapons.

• Send the Salt II treaty to the Senate and support its ratification.

• Bury the MX missile boondoggle once and for all.

• Stop wasting money on nerve gasses and other indiscriminate killers.

• Put this nation out front again in the effort to halt the spread of nuclear weapons—and the threat of doomsday blackmail.

Education—the Future of Our Children—the Future of Our Nation.

"Getting this nation's schools back on the track will be one of the top priorities of the Mondale Administration. Everything depends on strong schools and strong colleges: a healthy economy, a strong defense, social justice, opportunity for all. There is no reason whatsoever why the next generation of Americans cannot be the best educated and trained in this nation's history."
—Walter Mondale



Here's how Mondale will go about it:

• Establish a Fund for Excellence to help local schools do a better job of teaching children.

• Start an "Education Corps" to attract bright and dedicated young people to teaching careers, and help the teachers already in the classroom to sharpen their skills.

• Give the nation's laboratories, libraries, and research centers the support they must have.

• Start a crash effort to give our kids better training in math, science, and languages. That's where tomorrow's jobs will be.

• Strengthen programs for rural and inner-city schools to give poor children an even break.



• Make sure that every American family, and not just the wealthy few, can afford to send their kids to college.

• Create awards to help gifted graduate students complete their training.

• Stop the loss of talent that occurs because of discrimination and sex stereotyping in schools.

— Labor Donated —

EXHIBIT 1

4-7-84

ATTACHMENT H

State of Pennsylvania)
City of Philadelphia)

A F F I D A V I T

KNOW ALL MEN BY THESE PRESENTS:

That I, James P. Carino, III, residing at 1142 Stony Lane, Gladwyne, Pennsylvania, 19035 Telephone: (215) 525-1219, a private investigator for six (6) years, being duly sworn, depose that:

1. On April 7, 1984, in connection with an investigation of possible violations by organized labor of Federal Election Commission (FEC) Regulations related to the U.S. Presidential primary campaign, I went to the Democratic Party of Upper Darby, Pennsylvania office which is in the Pennsylvania Seventh Congressional District, and located at 7016 Terminal Square, Upper Darby, Pa.

2. While in the office, I determined from Mike Hackman, a Mondale staffer, and from Mary Baulis, an alternate Mondale Delegate, that Mondale campaign literature was being passed out in the Seventh Congressional District to registered Democratic voters by the delegates and volunteers, While in the office, I saw the Alternate Delegate and several young people come in, pick up supplies of flyers, and depart.

3. I was given a copy of the flyers that were being handed out and copies of which are Exhibits hereto and bear my hand-

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written initials "JPC", the date "4/7/84", and which are described as follows:

a. A sample ballot headed "VOTE APRIL 10th" and bearing the names of WALTER MONDALE and BOB EDGAR (whom I identified as a Democratic Congressional candidate for the Pennsylvania Seventh Congressional District) and "Delegates" as Beth Fitzsimmons, Evelyn Hess, Ron Pesotsky, Robert Avelino, and Nancy Baulis (Alternate), whom I identified as Mondale delegates in the Pennsylvania Seventh Congressional District. There was a statement on the sample ballot "Paid for by the Delegates for Mondale." A copy of this sample ballot is Exhibit 1.

b. A flyer entitled "GOOD IDEAS VS NEW IDEAS" - Mondale Knows the Difference". The bottom of the flyer instructs the reader to vote for Mondale and Mondale delegates Beth Fitzsimmons, Bob Avelino, Evelyn Hess, Ron Pesotsky, Nancy Baulis (Alternate) and At-Large Delegates and the statement "Paid for by the At-Large Delegate Committee for Mondale." A copy of this flyer is Exhibit 2.

c. Flyer entitled "Mondale - For President - For Pennsylvania: The Economy - Key to Our Future." There is a printed notation at the bottom of the flyer that it is: "-Labor Donated-". A copy of this flyer is Exhibit 3.

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WITNESS THE FOLLOWING Signature:

James P. Carino, III

State of Pennsylvania)

County of Philadelphia)

I, Joan D. Roberts, a Notary Public in and for the County aforesaid, in the State of Pennsylvania, do hereby certify that James P. Carino, III, whose name is signed to the foregoing affidavit, has personally appeared before me in my County aforesaid and swore and acknowledged the same this 14 day of May, 1984.

Joan D. Roberts
Notary Public

My Commission expires on the 26 day of October, 1987.

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EXHIBIT 1

VOTE
★APRIL 10th★

WALTER MONDALE	**E2**
BOB EDGAR	**E9**
DELEGATES	
Beth Fitzsimons	**F17**
Evelyn Hess	**F21**
Ron Pesotsky	**G22**
Robert Avellino	**G23**
ALTERNATE	
Nancy Baulis	**D26**

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EXHIBIT 2



GOOD IDEAS
VS.
"NEW" IDEAS

MONDALE KNOWS THE DIFFERENCE

JOBS, AND THE ECONOMY

MONDALE: Proposes full employment law with teeth in it, policies that protect, expand jobs, trade that increases rather than costs U.S. jobs, rebuilding roads, bridges, ports, transport systems.

HART: Voted against jobs for U.S. auto workers in opposing the Chrysler loan guarantee, opposes domestic content bill, supports "free trade" in a world where it's a myth, while hundreds of U.S. workers lose jobs to unfair foreign competition. Supports the sub-minimum wage for teenagers.

SOCIAL SECURITY

MONDALE: Supports improvements in the minimum benefit level and in disability benefits.

HART: Opposed earmarking windfall profits tax revenues for Social Security.

SOARING 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: Voted with the American Medical Assoc. (AMA) and hospital lobby to oppose hospital cost containment.

OIL COMPANY PROFITS

MONDALE: Led the winning fight for a Windfall Profits Tax so that oil companies would pay their fair share.

HART: Opposed the corporate Windfall Profits Tax. Now proposes a $10/barrel surtax on imported oil, costing the average family more than $340/year.

THE NOMINATION FOR PRESIDENT SHOULD BE DECIDED ON THE ISSUES...NOT "NEW" IDEAS OR "OLD" IDEAS...BUT GOOD IDEAS VS. BAD IDEAS.

LOOK BEYOND THE SLOGANS TO THE ISSUES...VOTE

MONDALE

and MONDALE DELEGATES

BETH FITZSIMONS — **EVELYN HESS**

BOB AVELLINO — **RON PESOTSKI**

NANCY BAULIS – Alternate

AND AT-LARGE DELEGATES

Paid for by the At-Large Delegate Committee for Mondale

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Mondale for President
for Pennsylvania

The Economy—Key to Our Future

"The key to this nation's future is a healthy growing economy—an economy that provides jobs and opportunities for all Americans, and not just profits for the rich. We have to put people back to work. Without jobs, there is no fairness"—Walter Mondale

Here's how he'll do it:

• Cut Reagan's record red-ink deficits—and cut them fast—by:

Stopping the Pentagon's waste and foolish spending. We can't afford to pay $110 for a 4-cent part; we can't afford to buy billion-dollar weapons that don't work.

Putting limits on how much the doctors and the hospitals can gouge Medicare and Medicaid and the public. Nobody should have to pay $700 a day for a hospital room or $85 to walk into a doctor's office.



Making the rich pay their fair share of taxes like everybody else.

• Tell the Federal Reserve that we want monetary policies that make sense—that help people buy houses and cars and home appliances.

• Put people—millions of men and women—back to work like FDR did, and retrain workers who were abandoned when their jobs were sent to Taiwan or Singapore.

• Make pay equity a reality.

• Tell government and business and labor, we have to work together to rebuild the nation's basic industries. We have to work together and stand together; there's no other way.



• Rebuild our nation's roads and bridges and dams and waterlines. These make up our nation's physical foundation, so they have to be sound.

• Enforce the civil rights laws so that women and minorities have a fair chance to get and keep a good job.

• Give smaller, creative companies an even break instead of passing out all the goodies to the big corporations. Big business doesn't need public assistance.



• See to it that American exporters don't get short-changed by other countries' unfair trading practices.

• Give family farmers a fighting chance against the giants of agribusiness.

• Bring the nation's governors and mayors together to forge a real partnership with the federal government to make this nation's cities good places to live.

"I know how to shape a government. I know how to lead. I know how to defend this country—and I know how to search for peace.

"In this, the nuclear age of doomsday weapons, we have to do everything in our power to ensure peace. The most awesome responsibility of the President is not only to keep us strong so that we don't invite attack, but to use all of our physical and moral strength to keep the peace and spare the world from holocaust."
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• Start an "Education Corps" to attract bright and dedicated young people to teaching careers, and help the teachers already in the classroom to sharpen their skills.

• Give the nation's laboratories, libraries, and research centers the support they must have.

• Start a crash effort to give our kids better training in math, science, and languages. That's where tomorrow's jobs will be.

• Strengthen programs for rural and inner-city schools to give poor children an even break.



• Make sure that every American family, and not just the wealthy few, can afford to send their kids to college.

• Create awards to help gifted graduate students complete their training.

• Stop the loss of talent that occurs because of discrimination and sex stereotyping in schools.

EXHIBIT 3

8 5 3 4 0 5 0 4 4

ATTACHMENT I

STATE OF VIRGINIA)
COUNTY OF FAIRFAX)

AFFIDAVIT

KNOW ALL MEN BY THESE PRESENTS:

THAT I, ERNEST W. LYLES, a private investigator and an associate of Miller and Associates, Ltd. of Falls Church, Va., being duly sworn, depose that:

1. I was in the Philadelphia, Pa. area on April 6th, 1984 for an investigation of possible violations by organized labor of Federal Election Commission (FEC) Regulations in connection with the U.S. Presidential primary campaign.

2. During the course of my activities, I went to the Democratic Party of Upper Darby, Pennsylvania which is in the Pennsylvania Seventh Congressional District, and located at 7016 Terminal Square, Upper Darby, Pa. shortly before 5:00 P.M. Although the office was the Democratic Party office, I saw a number of "Mondale" posters displayed in the window, but only one for "Hart".

3. There were two men and a woman in their mid-twenties in the office and I asked them if they had any literature on "Mondale" that I could have. They gave me a total of forty-eight (48) flyers and told me to give the rest to my friends and other people.

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4. The flyers which they gave me are entitled "GOOD IDEAS VS. 'NEW' IDEAS - MONDALE KNOWS THE DIFFERENCE", and the bottom of the flyer instructs the reader to vote for "Mondale and Mondale delegates - Beth Fitzsimmons, Evelyn Hess, Bob Avellino, Ron Pesotski, Nancy Baulis (Alternate) and "AT-LARGE DELEGATES." There is also a statement at the bottom of the flyer: "Paid for by the At-Large Delegate Committee for Mondale." A copy of this flyer bearing the notation "7016 Terminal Sq., Upper Darby;" my handwritten initials "EWL", and "1650 hrs., 6 Apr. 84", is Exhibit 1 to this affidavit.

WITNESS THE FOLLOWING Signature:

ERNEST W. LYLES

STATE OF VIRGINIA)
COUNTY OF FAIRFAX) To-Wit:

I, Howard L. Miller, a Notary Public in and for the County aforesaid, in the State of Virginia, do hereby certify that Ernest W. Lyles, whose name is signed to the foregoing Affidavit, has personally appeared before me in my County aforesaid and sworn and acknowledged the same.

Given under my hand this 15 day of May 1984.

Notary Public

My Commission Expires: 9 February 1985

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EXHIBIT 1



GOOD IDEAS VS. "NEW" IDEAS

MONDALE KNOWS THE DIFFERENCE

JOBS, AND THE ECONOMY

MONDALE: Proposes full employment law with teeth in it, policies that protect, expand jobs, trade that increases rather than costs U.S. jobs, rebuilding roads, bridges, ports, transport systems.

HART: Voted against jobs for U.S. auto workers in opposing the Chrysler loan guarantee, opposes domestic content bill, espouses "free trade" in a world where it's a myth, while hundreds of U.S. workers lose jobs to unfair foreign competition. Supports the sub-minimum wage for teenagers.

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MONDALE: Supports improvements in the minimum benefits level and in disability benefits.

HART: Opposed earmarking windfall profits tax revenues for Social Security.

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MONDALE: Led the winning fight for a Windfall Profits Tax so that oil companies would pay their fair share.

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LOOK BEYOND THE SLOGANS TO THE ISSUES...VOTE

MONDALE

and MONDALE DELEGATES

BETH FITZSIMONS — **EVELYN HESS**

BOB AVELLINO — **RON PESOTSKI**

NANCY BAULIS – Alternate

AND AT-LARGE DELEGATES

Paid for by the At-Large Delegate Committee for Mondale

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STATE OF VIRGINIA)
COUNTY OF FAIRFAX)

AFFIDAVIT

KNOW ALL MEN BY THESE PRESENTS:

THAT I, RICHARD E. LAWRENCE, a private investigator and an associate of Miller and Associates, Ltd. of Falls Church, Va, being duly sworn, depose that:

1. I was in the Philadelphia, Pennsylvania area on April 6, 1984, for an investigation of possible violations by organized labor of Federal Election Commission (FEC) Regulations in connection with the U.S. Presidential primary campaign.

2. I went to an office at 1420 Walnut Street where, in back of the office, was a large "Mondale At-Large Delegate Committee" sign. There did not seem to be much activity in the office at the time, other than people answering telephones, and I asked one of the people there who seemed to be on the staff, for any campaign material they had to give out.

3. I was given two items, one of which is a four page tabloid entitled "Five Reasons Why Pennsylvania Needs Walter Mondale". The tabloid bears the instruction "Vote for Mondale At-Large Delegates" and bears the names of W. Wilson Goode, Richard S. Caliguiri, Ed Rendell and Lou Tullio. The front of the tabloid bears the statement "Paid for by the Mondale At-Large Delegate Committee." A copy of this tabloid is Exhibit 1 to this Affidavit and bears my handwritten initials "REL" and the date "4/6/84".

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4. The second item I was given was a sample ballot entitled "Official Mondale Delegate Ballot" and solicits the election of the Pennsylvania Second Congressional District Mondale delegates. There is a statement at the bottom of this ballot: "Paid for by the Second Congressional Delegates for Mondale, Anthony McNeil, Treasurer." A copy of this sample ballot is Exhibit 2 to this Affidavit and bears my handwritten innitials "REL" and the date "4/6/87".

WITNESS THE FOLLOWING Signature:

Richard E. Lawrence

RICHARD E. LAWRENCE

STATE OF VIRGINIA)
COUNTY OF FAIRFAX) To-Wit:

I, Howard L. Akron, a Notary Public in and for the County aforesaid, in the State of Virginia, do hereby certify that Richard E. Lawrence, whose name is signed to the foregoing Affidavit, has personally appeared before me in my County aforesaid and sworn and acknowledged the same.

Given under my hand this 15 day of May 1984.

Howard L. Akron

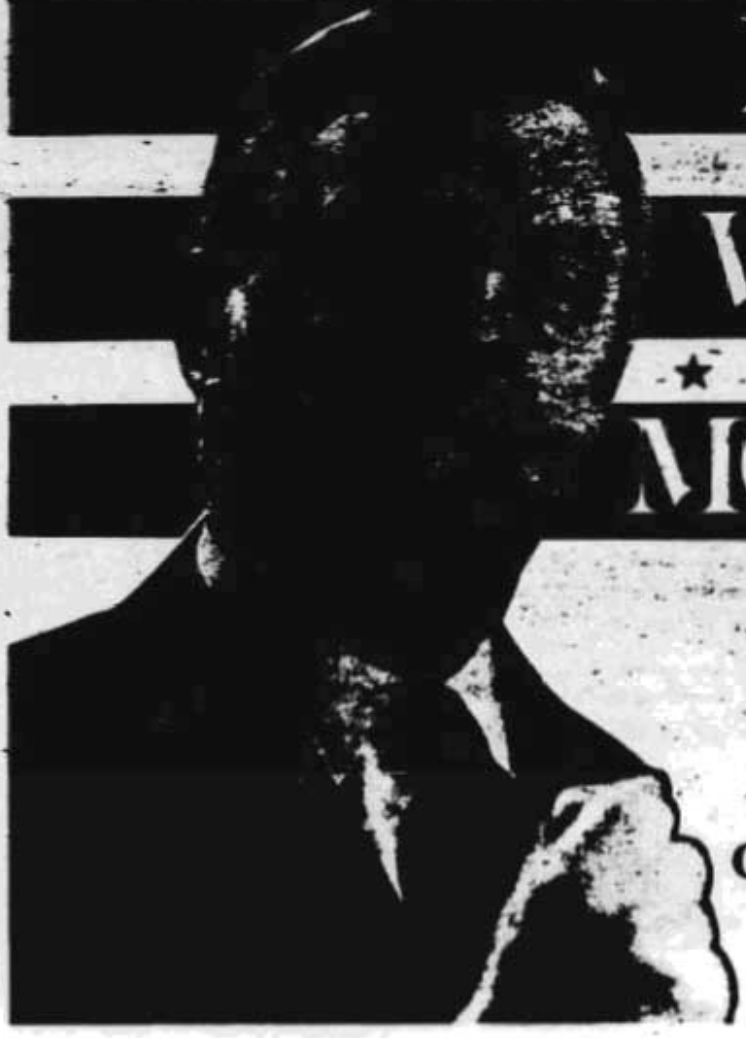
Notary Public

My Commission Expires: February 9, 1985

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EXHIBIT 1

FIVE REASONS WHY PENNSYLVANIA NEEDS WALTER MONDALE



VOTE for
MONDALE DELEGATES
ON TUESDAY, APRIL 10th

REL
4/6/84

Paid for by the Mondale At-Large Delegate Committee

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1. JOBS & THE ECONOMY

Walter Mondale Stands for Jobs

Walter Mondale understands that the first priority in any successful Presidency is for Americans to have productive jobs. Pennsylvanians have been hit hard economically in the past four years—and they need a hard-hitting friend in the White House: Walter Mondale. With unemployment already at severe levels in steel and other basic industries across the state, another 350 jobs were lost early this month when the U.S. Steel plant closed in Johnstown—and yet another 3,800 steelworkers are to be laid-off by the end of April. Jobs have been cut in half at the Volkswagen plant in New Stanton—down to 2,500.

Walter Mondale has an aggressive plan to preserve and create jobs for Pennsylvania and the rest of America by:

- ensuring economic growth by slashing the incredible federal budget deficits and restoring sensible fiscal policies in Washington
- adopting a more aggressive trade policy—including matching other countries' export subsidies product for product and dollar for dollar—in order to persuade them to reduce these unfair subsidies
- promoting a full-employment policy aimed at ensuring jobs for all who want to work—especially young Americans who are hardest hit by unemployment
- revitalizing basic industries—including steel and automobiles—and creating incentives for reinvestment in existing plants
- investing more in training, retraining and education for coping with technological change and a more competitive world economy
- enacting tough plant-closing legislation to stem the flow of jobs to foreign countries with cheap labor



As Vice President, Walter Mondale took an active role in promoting the loan guarantee program for Chrysler in 1979, which saved 300,000 Chrysler jobs and 20,000 companies dependent on Chrysler. But Gary Hart voted firmly against it.

When the Wheeling-Pittsburgh Steel Co. needed loans in 1979 to open up a steel rail plant outside of Pittsburgh and remain competitive, Walter Mondale rallied to their support. But Senator Gary Hart was one of only six Democrats who voted against the loans needed by Wheeling-Pittsburgh, claiming "it is the worst possible form of government in the workplace. It is in fact a form of private socialism."

2. SENIOR CITIZENS

Walter Mondale Stands for Senior Citizens

Throughout his 20 years of public service—as especially as a U.S. Senator and as Vice President—Walter Mondale has protected and promoted the interests of elderly Americans. That's only one reason why some of the most respected and effective senior citizens organizations have embraced the Mondale campaign. They know that as President, Walter Mondale will keep his commitment to:

- ensure the long-term integrity of the Social Security system so that the social compact honored by generations of Americans will not be broken
- expand Medicare and Medicaid to meet the health needs of the elderly
- get tough with the soaring costs of health care—contain these costs with legislation which simultaneously protects the quantity and quality of health care for the elderly
- abolish mandatory retirement for older men and women who want to remain in their jobs and careers
- adopt and enforce adequate regulations to ensure the safety and dignity of older Americans who reside in nursing homes



3. FOREIGN POLICY

Walter Mondale Will Bring Us A SAFER WORLD

As the most active Vice President in the history of the office, Walter Mondale is more experienced in foreign policy and running the federal government than any candidate for the Presidency—including Ronald Reagan. He was the first candidate to support the nuclear freeze—and as President he will immediately act to negotiate with the Soviet Union and lead us back from the brink of nuclear peril. His foreign policy is focused on:

Israel and the Middle East: Walter Mondale's record in the U.S. Senate is second to none in support of Israel, and he has worked hard to prevent the sale of weapons to Arab nations. As Mayor Ed Koch of New York City says, "On the issue of Israel's security, there is no one who comes close to Walter Mondale."

Vice President Walter Mondale demonstrated this commitment in 1978 when he traveled to the Middle East and got the peace process moving between Egypt and Israel, helped persuade Begin and Sadat to negotiate face to face, and played a critical role in the success of the Camp David talks.

Walter Mondale holds these principles for peace in the Middle East:

- continue to insist that we will neither recognize nor negotiate with the PLO until it first recognizes the State of Israel, abandons terrorism and accepts the terms of UN resolutions 242 and 338
- remain committed to a Jerusalem united forever with free access to the holy places
- no sales of sophisticated military equipment to Israel's neighbors which could disrupt the military balance and impair the security of Israel
- the leaders of the other Arab nations must follow Sadat's lead and sit down face-to-face with Israel at the bargaining table

Central America: Walter Mondale's objective in Central America is clear. First, we must achieve an agreement for mutual non-intervention by all outside interests, and second, achieve a mutual withdrawal of forces. America must let the people of Central America work out their own histories.

As President, Mondale would reduce the number of U.S. troops in Honduras, but before totally withdrawing them he would seek to negotiate an agreement with Nicaragua to

- remove any and all Cuban forces there
- ban the use of MIGs in the area
- secure an enforceable agreement on non-intervention.

Europe: Walter Mondale has pledged to keep faith with our European allies and as President he will not reduce the United States' troop commitment in Europe. He also would help America's allies preserve their access to Persian Gulf oil.

4. THE STATE & THE CITIES

Walter Mondale is a Friend of Pennsylvania and our cities

Throughout his political career, Walter Mondale has been a forceful advocate of America's cities—that's one reason why the mayors of Philadelphia, Pittsburgh, New York, Los Angeles, San Francisco, Seattle, Miami, San Antonio and many other cities have warmly endorsed Walter Mondale.

These men and women appreciate Walter Mondale's pledges to restore funding to the federal programs—Medicare, child nutrition, day care, mass transit assistance and housing aid—which have been ravaged by the Reagan budget cuts. And these urban leaders can see the profound differences between Walter Mondale and Gary Hart—especially Mondale's greater concern for minorities and the cities, and his more mature and developed leadership capacity. They know that Walter Mondale is committed to:

Fair Taxation: When it comes to the issue of tax equity, Walter Mondale considers the decline in corporate tax revenues to be a disgrace. He favors 35 percent minimum corporate tax and a surtax on individuals with grades of more than $100,000 a year. He also would reform personal income tax "indexing" to benefit only those taxpayers earning $30,000 a year or less.

Gary Hart, on the other hand, has flirted with a potentially regressive tax on consumption (sales taxes) which could impede growth without balancing investment.

Protecting Our Environment and Natural Wealth: while reversing the Reagan trend of coddling the corporations through lax enforcement of our environmental laws and granting tax advantages.

Rebuilding Our National Infrastructure—the highways, bridges and waterways which are the arteries of America's economy.

TMI—ensuring that the nuclear facility at Three Mile Island is kept shut down —so that it never again threatens the people of Pennsylvania and surrounding states.

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5. GOOD IDEAS VS "NEW IDEAS"

Walter Mondale Knows the Difference



Here is a sampling of some of Senator Gary Hart's new ideas. Take a good look, Pennsylvanians:

- More than $500 a year should be deducted from the individual paychecks of working men and women to be placed in government accounts—so that if they lose their jobs they can withdraw from the account to pay for retraining or further education.
- College students ought to pay interest on student loans—while they are still in college.
- A fee of $10 per barrel should be imposed on all oil imported into the U.S. The consequences? Families in the Northeast—where so much imported oil is consumed—who heat with oil would pay at least $350 more each year in heating costs and another $450 more in gasoline costs. Prices paid by the average family for goods and services would rise by $500.
- Employers should be allowed to pay *less* than the minimum wage (55 percent) to young men and women who want jobs under the age of 20.
- The nuclear arms "build-down", which Gary Hart co-sponsored in the Senate more than a year ago and still endorses, was designed by Republicans to undermine the nuclear freeze movement. The "build-down" would allow one new high-technology nuclear weapon to be built for every two "old" weapons destroyed.

Why Mondale will defeat Ronald Reagan in November:

- Mondale's experience and proven leadership
- Mondale's personal and political values
- Mondale's broad-based national support

Walter Mondale is the one candidate with the experience and leadership to move America in the right direction as we approach the 1990's.

What really matters to Pennsylvanians in the April 10th primary—as it should in all elections—are the issues of principle, policy and character. Unlike his opponents, Walter Mondale is an experienced leader who knows himself and what he believes in. Walter Mondale is not an "overnight sensation"—he is rooted deeply in a political tradition of government which serves people.

Ask yourself: which of the Democratic candidates you would rather have sitting across the table from the new Soviet leader in arms control talks?

Ask yourself: which Democratic candidate would put America's full resources behind creating and preserving jobs in our countries basic industries such as steel and autos?

The answer is Walter Mondale. During his long career of public leadership, Mondale has worked at every level of government—from the statehouse as Minnesota Attorney General to the U.S. Senate and the White House as Vice President.

Mondale will quit blaming the government for America's problems and will start leading it to solve them.

As a major newspaper editorial writer in New York City concluded a few days ago, in the face of sudden voter interest in Gary Hart, "Walter Mondale has not stemmed his slide—but continued to sail against the wind. We think he has chosen the course of principle—and that by November the values victimized by Reaganism can constitute a formidable bulwark."

V O T E F O R

MONDALE

AT-LARGE DELEGATES

W. WILSON GOODE RICHARD S. CALIGUIRI ED RENDELL LOU TULLIO

8504030044457

EXHIBIT 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. **HALPIN**
174 Doris A. **SMITH**
179 Herman **WOODEN**
184 Ann J. **LAND**
185 Arnold C. **STORR**

ALTERNATE DELEGATE

195 Dennis C. **WHITE**
197 Jeffrey D. **MORAN**
199 Leslie B. **KERNODLE**

Ret 4/87

[illegible] Democratic Division of Mondale
[illegible]

8504053044538

- ATTACHMENT K -

STATE OF VIRGINIA)
COUNTY OF FAIRFAX)

AFFIDAVIT

KNOW ALL MEN BY THESE PRESENTS:

THAT I, HOWARD L. MILLER, JR., a private investigator for 15 years and the principal of Miller and Associates, Ltd. of Falls Church, Va., being duly sworn, depose that:

1. During the course of an investigation of possible violations by organized labor of Federal Election Commission (FEC) Regulations during federal elections in Illinois, my investigators determined that the following had occurred in reference to the interrelationship of the Illinois Mondale for President Chicago Headquarters, Suite 530, 30 West Washington Street, Chicago, and the Amalgamated Clothing and Textile Workers Union Building at 333 South Ashland Avenue in Chicago.

a. An investigator who "volunteered" to work on behalf of Senator Mondale's campaign at the Chicago Headquarters office on March 6, 1984, was told by Katie Broeren, who supervised the volunteers, that volunteers were "desperately needed" in the Union operated phone bank on S. Ashland Avenue. He was instructed by Katie Broeren to contact a "Manny" or "Joe" at the Union Hall. The investigator did as he was instructed and was, in fact, put to work on the phone bank. The "Manny" or "Joe" were subsequently identified as Manny Tudeur and Joe Costigan, who were Union staff employees.

b. While the investigator in "a" above was working on the phone bank at the Textile Workers Union on March 7th, there were only 5 or 6 people working the 15 phones when a news reporter arrived to cover the activities. The union staff employees quickly got together an additional 9 or so people to work the remaining phones and while the reporter was there, a "Helen", last name unknown but who worked in the finance office of the Union, came around as if she were supervising, but on a piece of paper she put in front of each caller was written "Say you are a Union Member".

c. On March 8, 1984, the investigator described in "a" above, went to the Chicago Mondale Headquarters to do volunteer work and he was again directed back to the Textile Workers Union Hall on S. Ashland Avenue to assist there.

d. On March 12, 1984, two other investigators went to the Mondale Chicago Headquarters at approximately 9:30 a.m. to volunteer to work on behalf of Senator Mondale's campaign. They were immediately sent to the Textile Workers Union Hall on S. Ashland Avenue, where they were asked to put self-adhesive address labels on already stuffed envelopes being sent out by the AFL-CIO.

e. On March 17, 1984, another investigator went to the Mondale Chicago Headquarters about 10:30 a.m. and volunteered to work on behalf of Senator Mondale. She met a staff person named Katherine, who may be identified with Katie Broeren, who asked her to take some Mondale pamphlets out on the street to distribute. When the investigator asked the staffer about phone

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banks, she was told that after she distributed the pamphlets that she could go to the Textile Union Hall on S. Ashland Avenue and work on the Union phone banks if she cared to, which, in fact, she did.

f. On March 19, 1984, an investigator, not mentioned above, who had volunteered to work at the Textile Union Hall, observed that college students who were sent from the Mondale Chicago Headquarters were calling other unions to find out when the workers finished work so that the student volunteers could go to the factories and pass out flyers to the voters.

g. On March 19, 1984, the investigator mentioned in "f" above, while at the Textile Union Hall, overheard a telephone conversation between "Will", not further identified, and an individual from the Mondale Chicago Headquarters urging "Will" to get the people out to vote.

WITNESS THE POLLOWING Signature:

HOWARD L. MILLER, JR.

STATE OF VIRGINIA)
COUNTY OF FAIRFAX) To-Wit:

I, Peter R Castillo, a Notary Public in and for the County aforesaid, in the State of Virginia, do hereby certify that Howard L. Miller, Jr., whose name is signed to the foregoing Affidavit, has personally appeared before me in my County aforesaid and sworn and acknowledged the same.

Given under my hand this 16TH day of May 1984.

Notary Public
Sign IN FX, VA.

My Commission Expires: 17 DEC. 85

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Support the Delegates Who Support Mondale

The 2nd District Mondale Slate

Norma J. White, Field Representative, Chicago Teachers Union

Damon E. Rockett, Commissioner of Public Health and Safety, City of Harvey. Member of Board of Directors, Harvey YMCA.

Patrick C. McClurkin, Graduate of the Howard University School of Law; actively engaged in the private practice of law in the city of Chicago.

Michael A. Roman, Graduate of the DePaul University Law School; presently engaged in the private practice of law in the city of Chicago; Real Estate Broker and Notary Public. Abogado Bilingue, Notario Publico Y Realtor.

Sheila A. Rivers, Community Activist; Precinct Representative, 9th Ward Citizen's Committee; Coordinator, The Extended Arms Center for Battered Women and Children.

Catherine Poindexter, Trustee of Thornton Township; Member of Board of Directors, South Suburban Council on Aging.

Lupe Valadez, Financial Secretary, Local 65, United Steelworkers of America; Member of Board of Directors, Claretion Medical Center and South Shore Hospital.

Hermoline Saxton, President, Local 5016, Communication Workers of America.

Alternates

Kathryn L. Battiste, Member of Chicago Teachers Union; Past Secretary, Dolton Homeowners Association.

Joseph C. Caparelli, International Brotherhood of Electrical Workers.

Barbara A. Dunn, Sales Marketing Representative, Trans World Airlines, Inc.

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On March 20th Vote for WALTER MONDALE FOR PRESIDENT

AND THE MONDALE DELEGATES

(VOTE FOR 8)

- ☒ **NORMA J. WHITE** (MONDALE) **#54**
- ☒ **DAMON E. ROCKETT** (MONDALE) **#55**
- ☒ **PATRICK C. McCLURKIN** (MONDALE) **#56**
- ☒ **MICHAEL A. ROMAN** (MONDALE) **#57**
- ☒ **SHEILA A. RIVERS** (MONDALE) **#58**
- ☒ **CATHERINE POINDEXTER** (MONDALE) **#59**
- ☒ **LUPE VALADEZ** (MONDALE) **#60**
- ☒ **HERMOLINE SAXTON** (MONDALE) **#61**

MONDALE ALTERNATES

(VOTE FOR 3)

- ☒ **KATHRYN L. BATTISTE** (MONDALE) **#90**
- ☒ **JOSEPH C. CAPARELLI** (MONDALE) **#91**
- ☒ **BARBARA A. DUNN** (MONDALE) **#92**



ILLINOIS FOR MONDALE

Chicago
10 W. Washington, #510
Chicago, IL 60602
(312) 368-9184

Springfield
601 N. First Street
Springfield, IL 62702
(217) 522-9850

Paid for by the 2nd District Mondale Delegate Committee

WALTER MONDALE



THE EXPERIENCE TO KNOW WHAT WE NEED TO CHANGE... THE STRENGTH TO MAKE IT HAPPEN

ATTACHMENT L

"America must be number one again 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 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.



Mondale for President
2201 Wisconsin Avenue, N.W.
Washington, D.C. 20007
Telephone: 333-333-1000

MONDALE

RECEIVED AT THE FEC

GC#4624

August 28, 1984

RECEIVED
FEDERAL ELECTION COMMISSION
GENERAL COUNSEL
84 AUG 31 P1:28

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

MUR 1667

Dear Mr. Steele:

Pursuant to our footnote on page 10 of our Response to Interrogatories, attached is a list of additional delegate candidate names.

Sincerely,

Lyn Oliphant

Lyn Oliphant
Deputy General Counsel

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Paid for by Mondale for President, Inc.

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Additions: Kansas

Homer Kruckenberg
Marie Peterson
Julia Clem
Dan Glickman
Minnie Anderson
Bert Chaney
Jolene Grabill
Ralph Ross
Pauline Janes
Jarrett Molen
Owen O'Hara
Rossetta Dotson
Marvin Barkis
Ardena Matlack
John Carlin
Helen Ellerman
Charles Thompson
Clyde Townsend

Additions: Maryland

Jayne Astle
Nuria Alvarez
Mamerta Benzon
Patricia Billings
Irene Dandridge
Ed Lamon
Colleen Martin-Lauer
Clarence Burns
Ben Cardin
Charles Gilchrist
Jim Kraft
Stephen Sachs
Vera Hall
Jaunita Mitchell
Mary Jo Neville
Michael Barnes
Barbara Taylor
Steny Hoyer
Barbara Mikulski
Parren Mitchell
Paul Sarbanes
Parris glendening
Harry Hughes
Tim Murphy
Donald Schaefer
Thomas Howard

Additions: Missouri

Robert Meyer

Additions: North Carolina

Wallace Harrison
Brenda Ray
C. Robin Britt
Stephen Neal
Charles Rose
Ruby Jones
David Price
Betty Speir

Additions: New Hampshire

Jaunita Bell
Harriet Casey
Earl Bourdon
Mary Chambers
Michael Greico
John Hancock
Irene Gallen
Katherine Hanna
Marilyn Monahan
Chris Spirou

Additions: Rhode Island

Eva Jackson
Eleanor Slater
Claiborne Pell
Fernand St. Germain
Joseph Walsh
J. Joseph Garrahy
Frank Fiorenzano
Maureen Maigret
Julius Michaelson

Additions: Washington

Larry Baker
Monica Benton
Ray Williams
Dean Anderson
Mary Brillante
Larry Dahl
Ya-Yue Van
Alice Woldt
George Fleming
Don Bonker
Norman Dicks
Thomas Foley
Darrell Beers
Karen Marchioro
Norma Miller

Additions: West Virginia

Evelyn Harris
Lowell Johnson
Joseph Powell
Nick Joe Rahall
Cecil Roberts
Shirley Love
Beatrice Stout
Stephen Webber
Clyde See
Jewell Bailey
Joseph Goodwin
Shelby Leary
Sharon Rockefeller

Additions: Colorado
Judy Henning

Additions: Distict of Columbia

William Krause
Josh Williams
Ivanhoe Donaldson

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California

Sal Rosselli
Doris Ward
William Lockyer
Susan Hammer
Jackie Speier
Sandra Carter
Patrick Johnson
Bruce Corwin
Edmund Edelman
Joy Picus
Violet Rabaya
Estelle Tuvman
Virginia Carabillo
Marjorie Green
Michael Roos
Teresa Aquerrebere
Edmund Brown
Larry Gonzalez
Collin Lai
Evelyn Martinez
Gloria Molina
Consuelo Nieto
Leticia Quezada
Michael Yamaki
A. E. Brown
Marnie Delaney
Rodney Diamond
Irene Tovar
Norma Vescovo
Joan Acosta
Charles Calderon
Alfred Encinas
Robert Morales
William Tan
Lucille Torres
Geneva Vega
John Greenwood
Clarence Gregory
Shirley Guy
Beverly Hines
Joe Plancentia
Michael Reza
Gloria Vargas
Isabel Verver
Joyce Coleman-Magninn
Jane Carney
Albert Casey, Jr.
Mary Curtin
Arthur Garcia
Gloria Harrisson
Kathy Kinley
Gail Laguna
Manuel Arrendondo
Debra Cucci
Gail Fabian
Frank Motts

Jackie Suitt
Judith Perez
Sadie Reid
Dorthea Contreras
Wadie Deddeh
Verna King
Linda Le Gerette
Leon Williams
Carol -idgen
Doug Bosco
Kay Calas
Anthony Capozzi
John Crowley
Ralph Dills
Sandra Farha
March Fong Eu
Masani Mas Fukai
Kenneth Hahn
Jack Henning
Teresa Hughes
Mickey Kantor
Maureen Kindel
Stuart Moldaw
Madge Overhouse
Nick Patsaouras
David Roberti
William Robertson
William Russell-ShapiroPhilip Schaeffer
Paula Siegel
Jesse Unruh
Mary Vail
John Van De Kamp
Frank Vincencia
Diane Watson
Glen Anderson
Tony Beilenson
Barbara Boxer
George Brown
Sala Burton
Tony Coelho
Julian Dixon
Mervyn Dymally
Don Edwards
Vic Fazio
Augustus Hawkins
Rick Lehman
Mathew Martinez
Bob Matsui
George Miller
Norm Mineta
Leon Panetta
Jerry Patterson
Edward Roybal
Fortney Stark
Esteban Torres
Thomas Bradley

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California cont.

Diane Feinstein
Leo McCarthy
Thomas McEnry
Anne Rudin
Dan Whitehurst
Lionel Wilson
Peter Kelly
Carmen Perez

Florida

James Crabtree
Toni Riordan
John Schorger
Luann Bennett
Terrie Brady
Donald Gaffney
Constance Gilbert
Mary Bennett
Edgar Dunn, Jr.
Helen Faulk
Marvin Samuels
Ken Cooper
Brenda Caslin
Betty Handley
Helen Davis
John Hopkins
Sue Brewer
H. Robert Gemmer
Jeanne Malchon
Perkins Shelton
Evalyn Watts
Gabriel Cazares
Dan Chambers, Jr.
Marilyn Hackworth
Gail Husbands
Frances Baer
Freda Wright
Karen Clarke
Vic Culbertson
Dorothy Bedell
William Hilger
Olga Hirshorn
Franklin Mann
Ruth White
Jack Goldberger
Henry Handler
Adele Messinger
Steve Press
Elvio Serrano
Barbara Hamilton
Bob Lockwood
Karen Parks
Charles Perez
George Platt
Harry Rosencrantz
Kathleen Wright
Joel Alessi
Sandra Friedman
Nicki Grossman
Fred Lippman
Frank Ortis
Harvey Abrams
Annie Ackerman
James Burke
Jose Collado
Julia Dawson
Evelyn Schengrund
Paulette Wimberly
Barbara Carey
Eufaula Frazier
Bruce Singer
Pat Tornillo, Jr.
Alicia Baro
Alma Cambridge
Willa Carson
Jan Cherry
George Comerford
Edwina Davis
Jaunita Geathers
John Hahman
Ofelia Hirigoyen
Ruth Holmes
Shelby Hunt
Patricia Ireland
Marilyn Lenard
Joseph Martin
Robert
McMenemy
Daniel Miller
Athalie Range
Donald Resha
Marvin Rosen
Yvonne Schomber
Angelique Stahl
Linda Vogt
Rosette Walsh
Jeanese Wells
Anargyros Xepapas
John Zajac
Bill Chappell, Jr.
William Lehman
Claude Pepper
John Charles Bryan
Joseph Chapman, III
Virginia Conger
E. William Crotty
Carol Cycmanick
Alyce DiStasio
Dante Fascell
Maurice Ferre
Simon Ferro
Elaine Gordon
Robert Graham
Frank Hampton
Donna Harper

Florida cont.

Gloria Jackson
Harry Johnston, II
Roberta Knarick
Courtney Lerner
Christine Mitchell
Lee Moffitt
Richard Pettigrew
Patricia Philips
James Smith
Lawrence Smith
Charles Whitehead
Cynthia Yrabedra
Monnie Yungkans

Illinois

Lenore Colson
Stephen Culen
Cathleen Healey
Dorothea Hoch
Thomas Hynes
Robert Macari
A. Jayne Powers
John Ruel
Marjorie Friedman
Charles Hanus, Jr.
George Sangmeister
Daniel Vera
E. Karen Vogel
Frank Belmonte
John Daley
Walter Kozubowski
Anton Lichner
Rose Marie Lipinski
Frank Stemberk
Dolores Stingley
Anita Villarreal
Toni Kane
Hubert Loftus
Diana Sheffer
Jane Spirgel
Joyce Arthur
Robert Bugielski
Geraldine Cwick
Wayne Derengowski
Carmen Esparza
Peter Fosco
Carole Goldman
Elaine Lobodzinski
Juan Sanchez
John Cullerton
William Marovitz
Dawn Clark Netsch
William Singer
Carolyn Kleamenakis
Carol Ruth Abrams
John D'Amico

Jean Foran
Claudia Giannini
Eugene Moats
Betty Petroski
Roman Pucinski
Alfred Ronan
Nancy Shier
Danial Drewniak
Robert Flannery
Edward Koblika
Shirlee Pircher
John Dvorak
Joan Murphy
J. Glenn Schneider
Jean Tello
Terry Desmond
Mary Lou Kearns
Patrick Welch
Tim Hall
Barbara Sikes
Thomas Whalen
Nicolette Bender
E.J. Giorgi
Candace Kullerstrand
Donald Markgraff
Adlai Stevenson
Joel Brunsvold
Clarence Darrow
Christine Notary
Grace Bunn
Lela Carson
Mary Harkrader
Timothy Howard
James O'Connor
James Polk
Raymond Robinson
Wayne Turner
Judith Barringer
John Reagan
Penny Severns
Pauline Tammem
Gary Tumulty
Robert Watson
Betty Donovan
Marguerite Dubbelde
Charles Hester
Carlton Jones
Clyde Jordan
Sheila O'Malley
Rose Mary Bastien
Gerald Hawkins
Larry Hicks
Carl Alessi
Sondra Berman
Matthew Bieszczat
Margaret Blackshere
Gerald Bradley
Mary Brandon
Peg Breslin

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Illinois cont.

LeAnn Connelly
Jerry Costello
Bernice Covilli
John Daly
Betty DeCarlo
Eve Eisman
Judith Erwin
Patrick Finley
Sharron Gholson
Robert Gibson
Joan Harris
Michael Hogan
Doris Holleb
Charlotte Jaffe
Mary Lopinot
Barbara Lumber
Susan Manilow
Ann Marsalek
Margarita Martinez
Marion Ming
Harle Montgomery
Dolores Mosier
Sharon Perjak
Eva Savalas
Robert Shuff
Mae Smith
Jan Starr
Larry Stuffle
Reg Weaver
Bernice Weissbourd
James Wright
Frank Annunzio
Alan Dixon
William Lipinski
Melvin Price
Dan Rostenkowski
Marty Russo
Edward Burke
Vince Demuzio
James Donnewald
Richard Durbin
Neil Hartigan
Irene Hernandez
Jeremiah Joyce
Michael Madigan
Philip Rock
Sharon Thompson
Edward Vrdolyak
Joan Brennan
Roland Burris
Lillian Clinton
Thomas Dunn
Ranjit Ganguly
Dolores Gibson
Jack Guthman
Nelson Hangnaur
Kathryn Harvey
Joyce Holmberg
Luellen Laurenti
Thomas Lyons
Gwen Martin
Yvonne Rice
Paul Simon
Grace Mary Stern
Calvin Sutker

Michigan

Robert Battle
Kathryn Bryant
Elizabeth Jackson
Ernest Lofton
Virgie Rollins
Bernice Shields
Nathaniel Smith
Ann Graham
Alan Helmkamp
Shirley McMurtie
Odean Bradley
Richard Frantz
Maria Velasquez
Mike Daugherty
Larry Nielsen
Charlotte Persinger
Robert Fliearman
Dorothy Newman
Marie Kingdon
Michael Pyne
Dorothy Walker
Henry Acevedo
Stan Marshall
Lorraine McGee
Lucy Northrup
Anthony Bielawski
Grace NeMeth
Nancy Schwartz
Charles Stack
William Humphreys
M. Carroll Volpe
Barbara Wilson
Christine Fairchild
Paul Seldenright
Ralph Vermillon
Duane MacGregor
Patricia Nyberg
Don Parkkonen
Diana Prater
Janet Sonaglia
Ted Frantz
Joanne Kloss
Robert Merkle
Nancy White
Gloria Cobbin
Willie Gilbert
vera Griffith

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Michigan cont.

Mary Lou Parks
Herman Samuel
James Wadsworth, Jr.
Ann Edwards
James George
Mildred Jenkins
Ralph Liberato
William Polakowski
Thomas Anderson
Ethel Howard
Bard Young
Betty Hall
Charles Prather
Frank Runnels
Christophe Smith
John Dewan
Arrissie Evans
Grace Hampton
Lorenzo Moner, Jr.
Marie Weingold
Mary Ryan Taras
Donald Tucker
Margaret Bellenger
W. Michael Blumenthal
Lana Boldi
Richard Cordtz
Mary Craig
Laurence Deitch
Hildred Drew
Dorothy Engle
Florence Farr
Carolyn Forrest
Ellen Globaker
Dorothy Gonzalez
Eleanor Haroldson
Elizabeth Howe
Natividad Jenks
Stevetta Johnson
Carolyn Kilpatrick
Odessa Komer
Bernie Lennon
Harry Lester
Raymond Majerus
Kim Moran
Gail Nolin
Lana Pollack
Charlotte Rothstein
Patricia Talmadge
Ron Thayer, Jr.
Jaunita Watkins
Steve Yokich
David Bonoir
George Crockett, Jr.
John Dingell
William Ford
Dale Kildee
Carl Levin
Donald Riegle
Robert Traxler
Richard Austin
Frank Kelly
Coleman Young
James Blanchard
Rosemary DiPonio
Sam Fishman
Frank Garrison
James Glass
Martha Griffiths
Shirley Hall
Hubert Holley
Kathleen Johnston-Calati
James Killeen
Bruce Miller
Thomas Roach
Helen Root
Marc Stepp
Helen Wainio
Richard Wiener
Bea Williams

New York

William Grigonis
Tun-Hsu McCoy
Joseph Quinn
Patrick Halpin
Barbara Laufman
June Smith
Hazel Dukes
Judith Gardner
Charles Lesnick
Angelo Orazio
Jeanne Anguilo
Joan Flatley
Lorraine Phinn
Robert Zimmerman
Rocco Campanaro
Jerome Fleischman
Harold Forma
Judith Guise
Rener Reed
Pearl Weill
Andrew Jenkins
Louise Feller
Ralph Goldstein
Alan Hevesi
Sandra Povman
Richard Rubin
Elaine Weinstein
Gary Ackerman
John Donohue
Honey Miller
May Newburger
Aileen Ryan
Toby Ann Stavisky
Saul Weprin

New York cont.

Joseph Merritt
Irene Natividad
Nancy Padilla
Vivian Patterson
Rosalinda Perez
Helen Polonsky
Myrna Prieto
Nathan Robfogel
Van Robinson
Barbara Rochman
John Rogers
Hilda Sanchez
Al Shanker
Min Sheldon
Irene Simon
Nina Solarz
Juanita Watkins
Rosina Zanazzi
Mario Biaggi
Tom Downey
Geraldine Ferraro
Robert Garcia
John LaFalce
Stan Lundine
Matthew McHugh
Daniel Moynihan
Charles Rangel
Samuel Stratton
Ted Weiss
Carol Bellamy
Howard Golden
Edward Koch
Manfred Ohrenstein
Robert Abrams
Bella Abzug
Susan Alter
Dominic Baranello
Laura Chasin
Juanita Crabb
Mario Cuomo
Geraldine Daniels
Gloria Davis
Angelo Del Toro
Stanley Fink
Stanley Friedman
David Gantt
William Hennessey
Arthur Kremer
Elaine Lytel
Donald Manes
Olga Mendez
Dorothea Noonan
Esther Smith
Daniel Walsh
Thomas Whalen III

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New York cont.

Walter Crowley
Bertine Lafayette
Frances Luhman
Thomas Manton
Helen Sears
Herbert Berman
Beatrice DeSapio
Anthony Genovesi
Steven Goldenkranz
Anne Kessler
Max Sultan
Joni Yoswein
Irene Barbaro
Hyman Cohen
Florence Gerges
Martin Grossman
Jerry Landman
Marion Miller
Harry Schwartz
Carol Angelino
Allen Cappelli
Mary Codd
Joseph Shannon
Leo Zefferetti
Barbara Chocky
Beth Cosnow
Alice Sachs
Joseph Strasburg
Philip Wachtel
Elois Banks
Anibal Roman
Kenneth Sherrill
Betty Friedan
G. Oliver Koppell
Franz Leichter
Ruth Messinger
Stanley Michels
Myrna Quinones
Allan Roskoff
Aurelia Greene
David Rosado
Jose Serrano
Florence Donohue
Eliot Engel
Gerald Esposito
John Lawe
Guido Menta
Sandra Parness
Shirley Werthamer
Kenneth Finger
Miriam Jackson
Barbara Lerman
Thomas Sharpe
Caroline Silverstone
Laura Seitz
Irene Fox

John Grant
Judith McFatter
Philip Rotella
James Coyne
Harriet Gibbons
Karen Johnson
Joseph McDermott
J. Leo O'Brien
Lucille Pattison
Patricia Crandall
Karen Mahoney
Fred Miller
Kathleen Conley
Michael Bragman
James Hanley
Rosemary Pooler
Neal Sorkin
John Burns
Carolyn Zaroff
Maxine Brown
Paul Haney
Carolyn Rankin
Josephine Davenport
Vincent Graber
Joan Lillis
David Swarts
Christine Cuppola
Helen Cuppola
Paul Cole
James Sacco
Joan Dudek
James Keane
Sheila Murphy
Justina Rivera
William Rogowski
Timothy Toohey
Joseph Sweet
Denise Alexander
Carmen Arroyo
Morton Bahr
Ruth Bloom
Mildred Bowman
Leslie Calder
Karen Carey
Nancy Carey
Sol Chaiken
Edward Cleary
Alfred DelBello
Evelyn Dubrow
Maria Gonzalez
Vic Gotbaum
Richard Gottfried
Henry Guevera
Julia Harrison
Gertrude Hingos
Carol Hooper
John Mannion
Marcella Maxwell

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Ohio

L. Monty Erb
Brenda Parks
Stephen Sexton
Eunice Wyona King
Jene Galvin
Marian Spencer
William Fannin
Olivia Kindred
Beverly McCoy
Alice Kleman
Evelyn Bloomfield
James Cunningham
Colette Travis
Carol Wampler
William Burga
Barb Mangen
Winfred Fails
Frankie Glover
Ray Kest
Joseph LaCava
Patricia Moline
Scott Elisar
W. Jean Hostetter
Donald Simmons
Paul Jones
Chester Makoski
Barbara Varanese
Joan Dichinger
Judy Dixon
Harriet Chapman Arnold
Larry Tanner
Glenda Gunn
Milan Stone
Yvonne Woods
Linda Hinton
Ruby Johns
Donald Kendall
Harry Mayfield
Anna Biggins
Milton Cross
Jo Hazard
Leslie Johnson
Patricia Tutoki
Frank Jaworski
Barry Jones
Barbara Kubic
William Rose
George Banks
Rosemarie Feighan DeJohn
Vermeil Smith
Rose Lovano
Judith Robertson
Art Rush
Dorothy Sievers
Frank Valenta

Barbara Boyd
Henry Simon
Janesse Allen
Eula Bingham-Mattheis
Charles Bowling
John Coyne
Warren Davis
Opal Donaldson
Lisa Griffin
Bettie Heade
Edith Holsinger
Martin Hughes
Maureen Mancuso
Milan Marsh
Mary McGinty
Donald Mooney, Jr.
Janice Papez
Brenda Parks
Dorothy Ryan
Daniel Sferra
Dorothy Swenty
Ike Thompson
Joseph Tomasi
Jean Trainor Dare
Marvin Warner
Helen Williams
Mary Ellen Withrow
Joyce Wollenbert
Edward Feighan
Marcy Kaptur
Thomas Luken
Howard Metzenbaum
Mary Tose Oakar
Donald Pease
Sherrod B
Anthony Celebrezze, Jr.
Richard Celeste
Thomas Ferguson
Elaine Fortney
Linda Furney
Roy Gutierrez
Timothy Hagan
Tony Hall
Phyllis Hart
Harry Meshel
Edward Orlett
Vernal Riffe, Jr.
Judy Sheerer
Myrl Shoemaker
Marigene Valiquette
Frances Alberty
James Ruvulo

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Pennsylvania

Frances Capetola
Herman Hart
Martin Maddaloni
Roseann Pauciello
George Tomaccio
Maragret Bukowski
Carolann Coady
Edward Keenan
James Lloyd, Jr.
Patricia Owens
Max Pievsky
Kathleen Quinn
Sue Rosenthal
Margret Tartaglione
Janet Kalajainen
James McQuown
Yvonne Patz
Peter Steege
John Todorich
Elizabeth Verterano
Lois Wood
Leo Eschbach
Charles McLaughlin
Kathleen Neary
Natalie Schmoyer
Alan Darion
Harry Lesher
Majorie Reppert
Dorothea Schaeffer
Mary Schmidt
Peter Swaboda
Robert Avellino
Nancy Baullis
Beth Fitzsimmons
Evelyn Hess
James McGeehan
Raymond Regan
Joseph Bell
Michael Cassidy
Ada Jakubic
Betty Magag
John McDonald
Theresa Barrett
Evelyn Jarrow
Harold McCusker, Jr.
Frank McHale
Patrick Mellody
Christine Scopelliti
Frances Bartlomwicz
Frank Fay
Lois Hartel
Eleanor Kovach Kuhns
Barry Trievel
Maryann Williams
Melanie Archangelo
Jeanne Griffith
William Kerr
Blair Pawlowski
Rosemary Trump
Helen Whiteford
Penny Gerber
Joan Grohoski
Barbara Burns
Bruno Dellana
Ava Marie Jeter
Virginia Kelly
Patrick Landy
Thelma Lovette
Mossie Murphy
Sylvia Wilson
Judith Piper
Karen Ritter
Luther Snyder
Emrich Stellar, Sr.

Thomas Carney
Gloria Criscione
Patricia Liebel
Vito Manilla
Joyce Savocchio
Paula Clark
Babe Defino
Al Lepore
Thomas Morgan
Debbie O'dell Seneca
Anthony Rainaldi
George Rattay
Kathleen Reda
Barbara Slaughenhaupt
Raymond Troy
Marie Weaver
Howard Wise
David Wright
Electra Agras
Phillis Baskin
J.S. Batoff
George Becker
Dorothea Bell
Martin Berger
Sandra Bettor
Janie Blackwell
Betty Devitto
Marilyn Dogole
Sam Evans
Susan Focht
Micheal Giardino
Bob Hargraves
Judy Heh
Peter Hern, Esq.
Ivan Itkin
Glen Johnson
Ed Keller
Leslie Kernodle
Franklin Kury
Norma Lebder
Sandra Lockhart
Leon Lynch
Mary Mason
Elizabeth McCurdy
Gerald McEntee
Bob McIntrye
Diane Mellow
Matt Miller
John Morris
Kien Moy
Fran Musto
Mary Nancarrow
Elaine Naper

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Antoinette Nascone
Nancy Noonan
Annette Palutis
Morgan Plant
Anna Price
Gloria Rankus
Blondell Reynolds
Evelyn Richardson
Ed Rodriguez
Teresa Ruhl
Pat Scarscelli
Mark Seigel
Doris Smith
Jean Smith
Mary Lou Stefanko
Marian Tasco
Ed Toohey
Tom Trimm
Richard Trumka
Marilyn Vitali
George Walish
Joe Widmer
Carol Williams
Jennifer Wolf
William Coyne
Bob Edgar
Thomas Foglietta

Peter Kostmayer
Austin Murphy
John Murtha
Herb Arlene
Don Bailey
Rene Baumgartner
Robert Borski
Richard Caliguiri
Joe Coleman
Cathy Cowan
Ron Donatucci
Allen Ertel
Brad Fisher
Carolyn Franklin
Angie Gialloretta
Wilson Goode
Ed Stevens
John Taylor
Louis Tullio
Julius Uehlein
Joe Vignola
Larry Yatch

Linda Wallitsch
Ron Pesotski
Philip Starr
Patrick Gallagher
Pete Wambach, Sr.
Wanda Weaver
Michael Aquiline
Roberta Brayer
June DePietro
Lynn Lewkowicz
Jean Milko
Arthur Rooney, III
Lillian Enright
William Logan
M. Bridget Schell
Nancy Billick
Lois Mahalich
Andrew Palm
Frank Pugliano
Donald Purifoy
John Regoli
Kathleen Smith
Noreen Terrick
Mary Jane Wylie
Dolores Bross
Gary Bukowski
Patricia Hughes
K. Leroy Irvis
Rita Kane
Joe Kolter
Ann Land
Marie Lederer
Norman Loudenslager
James Manderino
Sophie Masloff
Ed Mezvinsky
Jeff Moran
Julie Onda
Gloria Rankus
Ed Rendell
Eugene Scanlon
Isador Shrager
Ted Simon

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Virginia

Christie Vernon
Stuart Wemeldorph
Robert Daily
Abbi Easter
Joan Carter
Gail Cunningham
Mary Gardner
Ronald Gillenwater
Kay McNett
Madeline Wade
Christy Blackburn-Rodriguez
Eileen Kelly
Odis Price
Hobart Honaker
Carolyn Jones
J. Jack Kennedy, Jr.
William Taylor
Cecille Vest
Sharon Davis
Albert Howard
John Sturdivant
Julian Carper
Brenda Cloyd
Mary Futrell
Frances Lowe
Emily McCoy
Imelda Mehlert
Gale Picker
Richard Reynolds III
Patricia Winton
Frederick Boucher
Norman Sisisky
Ira Lechner
Henry Marsh
Linda Moore
Owen Pickett
Jessie Rattley
Mary Margret Whipple

Wisconsin

Robert McNatt
John Placzek
Shirley Shannon
Ann Wilson
David Clarenbach
Sheila Earl
Darold Lowe
Jeannine Selvaag
Anne Anfinson
Rita Chandler
Richard Coy
Greenie Jackson
Robert West
Kitty Brennan
Geraldine Callow
Richard Michalski
Larry Nelson
Janet Pelland
Robert Vattendahl
Patricia Carr
George McKinney
Joseph Robinson
Cynthea Rollo
Bill Abitz
Joan Kaeding
Greg Weyenberg
Carol Zoran
Cindy Fenton
Robert Henning
Janet Newman
Gary Olds
Phyllis Pope
Steven Langlais
Mary Laux
Nancy Skadden
Bill Trarbach
Frank Hiber
Helen Isferding
Ralph Koenig
Louise Ratzel
James Blank
Jan Braun
Marjorie Bunce
Ruth Clusen
Mary Pat David
Ada Deer
Bernadette Elverman
Roberta Gassman
Alma Rose Gonzalez
Joseph Gruber
John Hayon
Virginia Kaufman
Karen Lamb
Patrick Lucey
D'Ann Pryor
Jack Reihl
Carmen Stout
William Troestler
Les Aspin
Tim Cohen
Tony Earl
James Flynn
Gerald Kleckza
Thomas Loftus
Mary Lou Munts
Jeffrey Neubauer
Terrance Pitts
Suellen Albrecht
Robert Bartlett
Barbara Ebenreiter
Jolene Plautz
Jeanette Timms
Louise Uphoff

Kentucky

Eddie Ford
J.R. Gray
Yvonne Gray
Harry Hinton
Warren Lee Hart
Sally Jane Taylor
P. Floyd Conner
C. Leslie Dawson
Virginnia Day
Ruth Pascual Frost
Barbara Aubrey
Kenny Settles
Leonard Cavanaugh
Joyce Gayle Cummins
Harry Haake
Sharon Tiller
William Verst
Betty Bell Peace
Bert Ed Pollittee
Patti Thompson
Jim LeMaster
Barbara Faye Amburgey
Francis Burke
Jewell Carr
Sophia Hays
Kitty Hutchings
Otto Ingram
Gary Massie
Jane Charmoli
Hallie Evans
Judith Fannin
Owen Hammons
Charlie Head
Jon Henrikson
Mary Ann Johnson
Leroy Lamar
Jean Ross
Janette Stumbo
Virginia Surratt
Betty Williams
James Yocom
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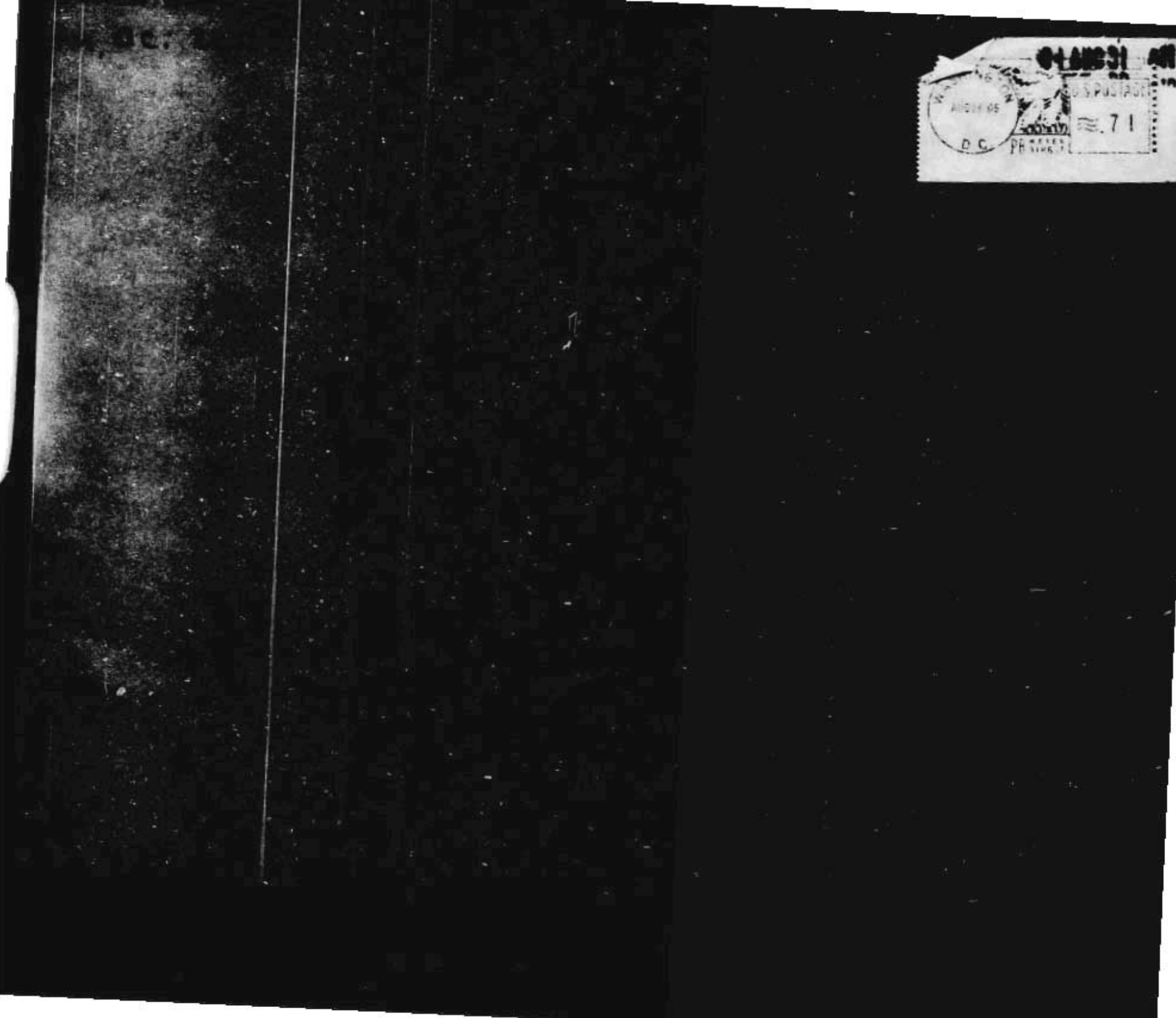
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Francis Lauter
2225 Ranch Rd.
Roanoke VA 24017

850404986

Brad C. Jones
806 Kent Rd.
Waynesboro VA 22980

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MURs 1667 and 1704
Mondale Delegate Committees)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on July 24, 1984, the Commission decided by a vote of 5-0 to take the following actions in MURs 1667 and 1704:

1. Deny the request, as submitted with the General Counsel's Memorandum to the Commission dated July 16, 1984, to approve requests for termination from the 3rd, 4th, 7th, 9th, 11th, 12th, 14th, 17th, 19th, 20th, 21st and 22nd District Mondale Delegate Committees in Illinois.

2. Send the letter attached to the July 16, 1984 Memorandum to the Commission.

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

Attest:

7-25-84
Date

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

Received in Office of Commission Secretary: 7-16-84, 11:26
Circulated on expedited tally basis: 7-16-84, 4:00

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 26, 1984

Michael Sher, Esq.
Friedman & Koven
208 South LaSalle Street
Chicago, Illinois 60604

Re: MUR 1667 and 1704

Dear Mr. Sher:

This responds to your letter of June 27, 1984, wherein you requested that the Commission accept the termination of the Mondale Delegate Committees from the 3rd, 4th, 7th, 9th, 11th, 12th, 14th, 17th, 19th, 20th, 21st and 22nd Districts in Illinois. On July , 1984, the Commission considered your request and decided not to approve the requests for termination for the above mentioned delegate committees.

This decision compliments the letter dated May 16, 1984, wherein you were advised that pending matters under review, MURs 1667 and 1704 prevent approvals for termination from being granted. The existing structure and organization of established delegate committees is critical to resolving the issues involved in MURs 1667 and 1704. Pursuant to 2 U.S.C. § 437(g), the Commission is authorized to investigate a matter once a complaint has been filed. Furthermore, neither 2 U.S.C. § 433(d)(1), nor 11 C.F.R. § 102.3 expressly state that a political committee can cease its reporting activities on its own initiative. The language in the regulations is passive on this issue, and only states that "[a] political committee (other than a principal campaign committee) may terminate only upon filing a termination report." 11 C.F.R. § 102.3. (emphasis added) This language does not prevent the Commission from refusing to approve requests for termination from a political committee during the pendency of an investigation.

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Accordingly, the delegate committees are required to continue their reporting obligations until further notice from the Commission. If you have any additional questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES N. STEELE
GENERAL COUNSEL

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

DATE: JULY 19, 1984

SUBJECT: MUR 1667 - MEMORANDUM TO THE COMMISSION
dated July 16, 1984

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

Attachment:
copy of vote sheet

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RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

84 JUL 16 AM : 26

July 16, 1984

SENSITIVE

MEMORANDUM TO: The Commission

FROM: Charles N. Steele
General Counsel

SUBJECT: Requests for approval to terminate from respondent political committees in MURs 1667 and 1704

The Office of the General Counsel has received a request that the Commission change its position, and approve requests to terminate political committees from respondents in MURs 1667 and 1704 (see Attachment I). Counsel representing Mondale Delegate Committees from the 3rd, 4th, 7th, 9th, 11th, 12th, 14th, 17th, 19th, 20th, 21st and 22nd Districts in Illinois contends that the Commission has no authority which supports its position that the above-named delegate committees are under an obligation to continue to submit reports under 2 U.S.C. § 434.

On May 15, 1984, the Commission voted unanimously not to accept termination requests from delegate committees that are respondents in MURs 1667 and 1704. Accordingly, the Commission decided to notify respondent-delegate committees and Mondale for President Inc., and sent the attached letters (See Attachments II and III). The Office of the General Counsel recommends that the Commission adhere to its position taken in the Executive Session of May 15, 1984, and continue to deny all requests for termination. The established structure and organization of each delegate committee remains a critical issue in resolving MURs 1667 and 1704.

Although counsel for the above-named delegate committees asserts that the Commission is without authority, pursuant to 2 U.S.C. § 433 or 11 C.F.R. § 102.3, neither the express language of the Regulations nor the Act prohibits this decision. The language in the regulations is passive on this issue and only states "[a] political committee (other than a principal campaign committee) may terminate only upon filing a termination report" 11 C.F.R. § 102.3. (emphasis added) This language does not prevent the Commission from refusing to approve requests for termination from a political committee during the pendency of an investigation.

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Recommendation

Deny the request to approve requests for termination from the 3rd, 4th, 7th, 9th, 11th, 12th, 14th, 17th, 19th, 20th, 21st, and 22nd District Mondale Delegate Committees in Illinois, and send attached letter.

Attachments

I. Request for approval of termination of political committtes.

II. Letter mailed on May 16, 1984, by RAD stating that the Commission will not approve any requests for termination.

III. Letter mailed on May 18, 1984, by the General Counsel's Office to Mr. Ifshin and Ms. Oliphant advising them of the letter mailed on May 16, 1984, by RAD.

IV. Letter to Michael Sher, Esq.

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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) 360-6608

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

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Attachment I, page 1 of 3

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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MICHAEL D. SHER
DIRECT TELEPHONE NUMBER:
(312) 360-6505

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 1567 / 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:jl

cc: Charles N. Steele, Esq.
Ms. Donna M. McWilliams, Treasurer
17th District Mondale Delegate Committee

8504004497

Attachment I, 3 of 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 16, 1984

TREASURER
COMMITTEE
STREET
CITY, STATE ZIP

Identification Number:

Dear TREASURER:

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
Assistant Staff Director
Reports Analysis Division

8504049 3

Attachment II

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 18, 1984

David M. Ifshin, Esquire
Carolyn U. Oliphant, Esquire
Mondale for President Committee, Inc.
2001 Wisconsin Avenue, N.W.
Suite 100
Washington, D.C. 20007

Re: MUR 1667

Dear Mr. Ifshin and Ms. Oliphant:

The purpose of this letter is to advise you that the Commission, on May 15, 1984, voted to send a notice to each of the delegate committees advising them that the Commission cannot, at this time, approve any requests for termination. A copy of the sample letter is enclosed together with a list of the committees to which the notices were sent on May 16, 1984.

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202)523-4143.

Sincerely,

Charles N. Steele
General Counsel

By: Lawrence M. Noble
Deputy General Counsel

Enclosure

8504499

Attachment III

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Michael Sher, Esq.
Friedman & Koven
208 South LaSalle Street
Chicago, Illinois 60604

Re: MUR 1667

Dear Mr. Sher:

This responds to your letter of June 27, 1984, wherein you requested that the Commission accept the termination of the Mondale Delegate Committees from the 3rd, 4th, 7th, 9th, 11th, 12th, 14th, 17th, 19th, 20th, 21st and 22nd Districts in Illinois. On July , 1984, the Commission considered your request and decided not to approve the requests for termination for the above mentioned delegate committees.

This decision complements the letter dated May 16, 1984, wherein you were advised that pending matters under review, MURs 1667 and 1704 prevent approvals for termination from being granted. The existing structure and organization of established delegate committees is critical to resolving the issues involved in MURs 1667 and 1704. Pursuant to 2 U.S.C. § 437(g), the Commission is authorized to investigate a matter once a complaint has been filed. Furthermore, neither 2 U.S.C. § 433(d)(1), nor 11 C.F.R. § 102.3 expressly state that a political committee can cease its reporting activities on its own initiative. The language in the regulations is passive on this issue, and only states that "[a] political committee (other than a principal campaign committee) may terminate only upon filing a termination report." 11 C.F.R. § 102.3. (emphasis added) This language does not prevent the Commission from refusing to approve requests for termination from a political committee during the pendency of an investigation.

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Attachment IV page 182

Accordingly, the delegate committees are required to continue their reporting obligations until further notice from the Commission. If you have any additional questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

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MRR

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 23, 1984

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

ATTENTION: STEPHEN MIMS
LAW CLERK

THROUGH: JOHN C. SURINA
STAFF DIRECTOR

FROM: JOHN D. GIBSON
ASSISTANT STAFF DIRECTOR
REPORTS ANALYSIS DIVISION

SUBJECT: UPDATE OF DELEGATE COMMITTEE INFORMATION

Attached is updated information on the back-up material sent to you June 7, 1984. Should you have any questions, please let me know.

Attachment

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AFSCME - PEOPLE
C00011114

RECIPIENT	IDENTIFICATION	AMOUNT
DC - Mondale Delegates - DC	C00182550	$ 1,000.00
FL - C.D. 2 Delegates for Mondale, FL	C00177873	$ 1,000.00
FL - C.D. 5 Delegates for Mondale	C00178707	$ 1,000.00
FL - C.D. 7 Delegates for Mondale	C00178947	$ 1,000.00
FL - Delegates for Mondale	C00178509	$ 2,000.00
FL - Mondale 16TH District Delegate Committee	C00175950	$ 2,000.00
FL - Mondale Delegates, C.D. 13	C00179440	$ 1,000.00
FL - South Florida Delegates for Mondale	C00176875	$ 5,000.00
IL - 15TH District Delegates for Mondale	C00177238	$ 1,000.00*
IL - Eleventh District Mondale Delegate Committee	C00175828	$ 1,000.00
IL - Ninth District Mondale Delegate Committee	C00176180	$ 2,000.00
IL - Third Congressional District Delegates for Mondale	C00178715	$ 2,000.00
NH - NH 1ST District Delegates for Mondale	C00176909	$ 5,000.00
NY - 6TH C.D. Delegates for Mondale	C00179887	$ 1,910.00
NY - At-Large Delegates for Mondale	C00181016	$ 5,000.00
NY - Mondale 17TH C.D. Delegate Committee	C00176883	$ 860.00
PA - 21ST Congressional 1984 Delegates for Mondale	C00179457	$ 1,500.00
PA - Delegates At-Large for Mondale	C00180679	$ 5,000.00
PA - Second Congressional District Delegates for Mondale	C00178319	$ 1,000.00
RI - 1ST and 2ND District Delegate Committee(s) for Mondale	C00177246	$ 2,500.00
RI - 1ST and 2ND District Delegate Committee(s) for Mondale	C00177808	$ 2,500.00
WI - Wisconsin At-Large Delegate Mondale Committee	C00180687	$ 5,000.00
	Chart I Sub-Total	$50,270.00

*Different Amounts Reported by PAC and Delegate Committee (Delegate Committee Amount Reflected)

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RECIPIENT	IDENTIFICATION	AMOUNT
NY - 11TH C.D. Delegates for Mondale	C00181115	$ 510.00
NY - 9TH C.D. Delegates for Mondale	C00179895	$ 375.00
NY - 8TH C.D. Delegates for Mondale	C00180224	$ 110.00
NY - 7TH C.D. Delegates for Mondale	C00179861	$ 45.00
NY - Long Island Mondale 4TH C.D.	C00181396	$ 2,055.00
NY - North Country Delegates for Mondale (26TH C.D.)	C00181107	$ 1,210.00
NY - The Mondale Team (32ND C.D.)	Not Registered	$ 1,215.00
NY - Southern Tier Committee for Mondale (34TH C.D.)	C00182329	$ 500.00
NY - 19TH C.D. Delegate Committee for Mondale	C00182899	$ 925.00
NY - 18TH C.D. Delegate Committee for Mondale	Not Registered	$ 350.00
NY - 15TH C.D. Delegates Coalition for Mondale	Not Registered	$ 960.00
NY - 16TH C.D. Delegates for Mondale	C00181388	$ 335.00
NY - 14TH C.D. Delegates for Mondale	C00181149	$ 355.00
NY - 13TH C.D. Delegates for Mondale	C00181131	$ 15.00
NY - 12TH C.D. Delegates for Mondale	C00181123	$ 510.00
NY - Mondale 19TH C.D. Delegate Committee	C00182899	$ 300.00
NY - Mondale 18TH C.D. Delegate Committee	Not Registered	$ 50.00
NY - Mondale 17TH C.D. Delegate Committee	C00176883	$ 750.00
NY - 15TH C.D. Delegate Coalition for Mondale	Not Registered	$ 750.00
NY - 14TH C.D. Delegates for Mondale	C00181149	$ 250.00
NY - 11TH C.D. Delegates for Mondale	C00181115	$ 250.00
NY - 9TH C.D. Delegates for Mondale	C00179895	$ 250.00
NY - 8TH C.D. Delegates for Mondale	C00180224	$ 500.00
NY - 23RD C.D. Delegates Committee for Mondale	C00180588	$ 845.00
NY - Naples-Mondale for President (23RD C.D.)	C00180216	$ 715.00
NY - Delegates for Mondale 25TH C.D.	C00180414	$ 775.00
NY - Lower Hudson Delegates for Mondale (22ND C.D.)	C00180570	$ 565.00
NY - 16TH C.D. Delegates for Mondale	C00181388	$ 500.00
NY - 12TH C.D. Delegates for Mondale	C00181123	$ 250.00
NH - 2ND C.D. Delegates for Mondale	C00176891	$ 1,350.00
	Chart III Sub-Total	$17,570.00
NY - Long Island Mondale 4TH C.D.	C00181396	$ 300.00
PA - 14TH C.D. Delegates for Mondale	C00180562	$ 1,000.00
NY - 23RD C.D. Delegates Committee for Mondale	C00180588	[$ 845.00]
	7-17-84 PAC Update Sub-Total	$ 455.00
	TOTAL	$68,295.00

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RECIPIENT	IDENTIFICATION	AMOUNT
IL - 12TH District Mondale Delegate Committee	C00175943	$ 2,000.00
IL - 12TH District Mondale Delegate Committee	C00175943	[$675.50]
IL - 16TH Delegates for Mondale	C00178681	$ 2,000.00
IL - 17TH District Mondale Delegate Committee	C00176925	$ 2,000.00
IL - 17TH District Mondale Delegate Committee	C00176925	[$1,042.24]
IL - 19TH District Delegates for Mondale Committee	C00178673	$ 2,000.00
IL - 20TH C.D. Delegates for Mondale	C00177881	$ 2,000.00
IL - Mondale Delegates for the Illinois 18TH Committee	C00176198	$ 2,000.00
NH - NH 2ND District Delegates for Mondale	C00176891	$ 5,000.00
NY - At-Large Delegates for Mondale	C00181016	$ 5,000.00
PA - Mondale Delegates Committee	C00178137	$ 3,400.00*
PA - 4TH District Delegates for Mondale	C00179846	$ 3,500.00
PA - Delegates At-Large for Mondale	C00180679	$ 5,000.00
WI - 5TH C.D. Mondale Delegate Committee	C00181438	$ 2,500.00
	Chart I Sub-Total	$34,682.26
MI - Sixth District Delegates for Mondale	C00179697	$ 3,000.00
MO - Western Missouri Mondale Delegate Committee (Kansas City)	C00183186	$ 2,500.00
MO - Western Missouri Mondale Delegate Committee (St. Louis)	Not Registered	$ 2,500.00
NY - 16TH C.D. Delegates for Mondale Committee	C00181388	$ 5,000.00
NY - Erie County Delegates for Mondale	C00181305	$ 500.00
PA - 15TH C.D. Delegates for Mondale	Not Registered	$ 500.00
PA - 5TH C.D. Delegates for Mondale	C00181008	$ 500.00
PA - 14TH C.D. Delegates for Mondale	C00180562	$ 5,000.00
WI - Wisconsin At-Large Mondale Delegates Committee	C00180687	$ 2,500.00
	Chart III Sub-Total	$22,000.00
PA - Mondale Delegates Committee	C00178137	[$ 850.00]
	7-17-84 PAC Update Sub-Total	[$ 850.00]
	TOTAL	$55,832.26

*Different Amounts Reported By PAC and Delegate Committee (Delegate Committee Amount Reflected)

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C00004836

RECIPIENT	IDENTIFICATION	AMOUNT
IL - Eleventh District Mondale Delegate Committee	C00175828	$ 1,000.00
IL - Eleventh District Mondale Delegate Committee	C00175828	[$294.42]
MD - Mondale Delegate At-Large Committee for Maryland	C00181974	$ 5,000.00
NY - At-Large Delegates for Mondale	C00181016	$ 5,000.00
PA - Delegates At-Large for Mondale	C00180679	$ 4,000.00
PA - Mondale Delegate Committee - 12TH C.D.	C00178954	$ 1,000.00
PA - Pennsylvania 17TH C.D. Delegates for Mondale	C00180182	$ 1,000.00
	Chart I Sub-Total	$16,705.58
MA - 6TH District Delegate for Mondale	Not Registered	$ 500.00
OH - Ohio Mondale At-Large Delegates State Committee	Not Registered	$ 2,500.00
	Chart III Sub-Total	$ 3,000.00
OH - Ohio Mondale At-Large Delegates State Committee	Not Registered	[$ 2,500.00]
	7-17-84 PAC Update Sub-Total	[$ 2,500.00]
	TOTAL	$17,205.58

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C00003806

RECIPIENT	IDENTIFICATION	AMOUNT
DC - Mondale Delegates - DC	C00182550	$ 600.00
FL - Mondale 15TH District Delegate Committee	C00176644	$ 3,000.00
FL - Mondale Delegates C.D. 8	C00178145	$ 1,000.00
FL - South Florida Delegates for Mondale	C00176875	$ 1,000.00
IL - 19TH District Delegates for Mondale Committee	C00178673	$ 3,200.00
IL - 22ND C.D. Delegates for Mondale	C00177840	$ 3,200.00
IL - 17TH District Mondale Delegate Committee	C00176925	$ 3,200.00
IL - 17TH District Mondale Delegate Committee	C00176925	[$1,563.36]
	Chart I Sub-Total	$13,636.64
PR - Delegates Committee With Mondale	Not Registered	$ 5,000.00
	Chart III Sub-Total	$ 5,000.00
MD - Mondale Delegate At-Large Committee for Maryland	C00181974	$ 5,000.00
FL - Mondale Delegates C.D. 8	C00178145	[$ 500.00]
	7-17-84 PAC Update Sub-Total	$ 4,500.00
	TOTAL	$23,136.64

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C00005728

RECIPIENT	IDENTIFICATION	AMOUNT
IL - 7TH C.D. Delegates for Mondale	C00178244	$ 1,000.00
NH - NH 1ST District Delegates for Mondale	C00176909	$ 5,000.00
NY - At-Large Delegates for Mondale	C00181016	$ 2,500.00
	Chart I Sub-Total	$ 8,500.00
PA - 11th Congressional Delegates for Mondale	C00178467	$ 50.00
	7-17-84 PAC Update Sub-Total	$ 50.00
	TOTAL	$ 8,550.00

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MACHINISTS NON-PARTISAN POLITICAL LEAGUE
C00002469

RECIPIENT	IDENTIFICATION	AMOUNT
MD - Montgomery County for Mondale Delegate Committee	C00180992	$ 500.00
MD - Montgomery County for Mondale Delegate Committee	C00180992	[$500.00]
NY - At-Large Delegates for Mondale	C00181016	$ 5,000.00
PA - 14TH C.D. Delegates for Mondale	C00180562	$ 2,400.00
	CHart I Sub-Total	$ 7,400.00
NY - Northern NY Delegates for Mondale	C00180190	$ 1,000.00
	Chart III Sub-Total	$ 1,000.00
FL - C.D. 2 Delegates for Mondale	C00177873	$ 1,000.00
	7-17-84 PAC Update Sub-Total	$ 1,000.00
	TOTAL	$ 9,400.00

UNITED STEELWORKERS OF AMERICA PAC
C00003590

RECIPIENT	IDENTIFICATION	AMOUNT
IL - Delegates for Mondale Committee - 21ST C.D.	C00176933	$ 1,000.00
PA - Mondale Delegates - 20TH District	C00180737	$ 2,000.00
PA - 4TH District Delegates for Mondale	C00179846	$ 2,000.00
PA - Mondale Delegate Committee - 12TH C.D.	C00178954	$ 2,000.00
	Chart I Sub-Total	$ 7,000.00
PA - 22ND C.D. Delegate Committee for Mondale	C00180166	$ 2,000.00
MD - Second District Delegates for Mondale	C00180984	$ 2,000.00
MD - Second District Delegates for Mondale	C00180984	[$ 2,000.00]
	7-17-84 PAC Update Sub-Total	$ 2,000.00
	TOTAL	$ 9,000.00

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CARPENTERS LEGISLATIVE IMPROVEMENT COMMITTEE
C00001016

RECIPIENT	IDENTIFICATION	AMOUNT
FL - South Florida Delegates for Mondale	C00176875	$ 1,000.00
IL - 20TH C.D. Delegates for Mondale	C00177881	$ 5,000.00
	Chart I Sub-Total	$ 6,000.00
NY - 22ND C.D. Delegates for Mondale	C00180570	$ 2,000.00
NY - The Mondale Team	Not Registered	$ 1,000.00
	7-17-84 PAC Update Sub-Total	$ 3,000.00
	TOTAL	$ 9,000.00

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UFCW ACTIVE BALLOT CLUB
C00002766

RECIPIENT	IDENTIFICATION	AMOUNT
NH - NH 2ND District Delegates for Mondale	C00176891	$ 5,000.00
	Chart I Sub-Total	$ 5,000.00
VA - Mondale 2ND C.D. Delegate Recruitment Committee	Not Registered	$ 5,000.00
KY - Kentucky At-Large Mondale Committee	C00181024	$ 5,000.00
PA - At-Large Delegates for Mondale Committee	C00180679	$ 5,000.00
NY - State At-Large Delegate Committee for Mondale	C00181016	$ 5,000.00
NY - Committee for Western New York Mondale Delegates	C00180208	$ 2,000.00
	Chart III Sub-Total	$22,000.00
MD - Mondale Delegate At-Large Committee for Maryland	C00181974	$ 2,500.00
MD - 4TH District Delegates for Mondale	C00181420	$ 100.00
MD - Mondale Delegate At-Large Committee for Maryland	C00181974	[$ 2,500.00]
MD - 4TH District Delegates for Mondale	C00181420	[$ 100.00]
NY - State At-Large Delegate Committee for Mondale	C00181016	[$ 5,000.00]
	7-17-84 PAC Update Sub-Total	[$ 5,000.00]
	TOTAL	$22,000.00

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IBEW LOCAL UNION 915 PAC
C00140749

RECIPIENT	IDENTIFICATION	AMOUNT
FL - C.D. 10 Delegates for Mondale	C00178939	$ 1,000.00
FL - C.D. 7 Delegates for Mondale	C00178947	$ 1,000.00
FL - Mondale Delegates C.D. 8	C00178145	$ 1,000.00
	Chart I Sub-Total	$ 3,000.00
FL - Mondale Delegates C.D. 8	C00178145	[$ 500.00]
	7-17-84 PAC Update Sub-Total	[$ 500.00]
	TOTAL	$ 2,500.00

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Mondale for President
2501 Wisconsin Avenue, N.W.
Washington, D.C. 20007
Telephone: 333-333-1000

MONDALE

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JUL 16 P4:11

**RESPONSE OF MONDALE FOR PRESIDENT COMMITTEE, INC.
TO REQUEST FOR PRODUCTION OF DOCUMENTS AND INTERROGATORIES
IN MUR 1667**

On May 29, 1984, Mondale for President Committee, Inc., ("MPC") received from the Commission a subpoena for production of documents and an order for answers to interrogatories. On June 5, 1984, MPC filed a motion to modify the subpoena and order and a request for an extension of time in which to comply. On June 12, 1984, an extension of time until July 13 was granted.

MPC has made every effort to comply with the subpoena and order. We have interviewed approximately 50 present and former MPC staff members and have made substantial efforts to obtain all requested documents.*/ The following response to the subpoena and order is based on the above-described inquiry. To the best of the information known to us at this time, the answers are accurate and complete. No privileged information or documents are provided. All references to "delegates" include selected delegates, delegate candidates and individuals who sought to become delegates.

The Commission in its letter of June 20, 1984, indicated that all responses are to be limited in scope to the issue of affiliation. Section 110.3(a)(1)(iii) clearly sets forth the

*/ The subpoena requests full identification of individuals named in response to interrogatories, including campaign title, last known residence and last known place of business. This information is included in a separate list. Exhibit 1.

Paid for by Mondale for President, Inc.

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criteria for affiliation. The Commission, however, indicated in its response to MPC's motion to modify that other unspecified criteria may also be relevant. MPC maintains its position that much of the information sought is irrelevant to the issue of affiliation. Furthermore, MPC contends that the Commission cannot, at this late time and without any notice, establish new criteria for affiliation and hold MPC responsible for complying with this new standard. Nevertheless, MPC has endeavored to provide the information requested. Although MPC is providing the requested information, we also reiterate and reserve our objections to the subpoena and order as set forth in our motion to modify of June 5, 1984.

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REQUEST FOR PRODUCTION OF DOCUMENTS

The following is a list of the documents and other materials provided pursuant to requests #1-16. As set forth in our motion to modify of June 5, 1984, in a spirit of full cooperation, on July 6 and July 10, 1984, MPC provided the materials requested by the Commission in #17 and #18, although that information is already in the possession of the agency and production of the information could not be compelled.

SUMMARY OF DOCUMENTS AND MATERIALS PRODUCED

1. Memorandum dated 1/12/84, from Bob Beckel, to delegates urging that they not accept PAC contributions.*/
2. Memorandum dated 1/6/84, from David Ifshin, Lyn Oliphant, Laurie Phillips to delegates providing FEC compliance advice.*/
3. Memorandum dated 1/12/84, from Elaine Kamarck to delegates providing general guidelines if they choose to form committees.*/
4. Memorandum dated 2/8/84, from Tim Finchem to Bob Beckel, Paul Tully, Tom Donilon, Tony Corrado, Mike Ford, Glen Cowan, John Bell, Pat Carroll, Donita Hicks, Matthew MacWilliams, Sally Schwartz, Mike Berman, David Ifshin, Elaine Kamarck, Paul Jensen, indicating that delegate committees should be encouraged to raise funds only where that fundraising would not interfere with MPC fundraising.
5. Memorandum dated 1/30/84, from Bob Beckel and Tim Finchem, to Bill Fleming, Gina Glantz, Jim Margolis (then state coordinators in Florida, Pennsylvania and Illinois) asking them to urge delegate committees to seek funds from MPC maxed-out contributors so as not to interfere with MPC planned fundraising in those states. (Although the memorandum indicates that a list of maxed-out contributors was provided to each

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*/ These documents were attached to the MPC response filed on April 30, 1984.

addressee, Gina Glantz never received the memorandum and only Bill Fleming, through Jesse Guido, provided any contributor list to delegate committees. See response to Int. #14.)

6. Memorandum dated 2/17/84, from William J. Fleming, to Jim Quackenbush providing a general overview of the political situation in Florida and the status of different activities to the extent they were known to MPC. The portions of this document insofar as they are unrelated to delegate committees are deleted.
7. Memorandum dated 2/17/84 from Amy Rosen to Jim Quackenbush, providing a description of upcoming fundraising events in Florida and indicating tension between delegate committees and MPC over fundraising. The portions of this document insofar as they are unrelated to delegate committees are deleted.
8. Memorandum dated 3/26/84, from Michael Roth to Bell Operating Company Representatives, informing them that any requests for service from Mondale delegate committees were not from MPC and were not to be covered by the National Payment Agreement.
9. Letter dated 3/21/84, from Brian E. Barkley to Michael Roth, confirming that the Maryland 8th C.D. Delegate Committee is not connected to MPC.
10. Memorandum dated 3/28/84, from James N. Steinhagen to Political Account Groups, Bell Operating Companies, repeating substance of memorandum from Michael Roth (Doc. #5).
11. Memorandum of 2/8/84 from Jesse Guido to Florida delegate committees requesting information as to identity of chairpersons and treasurers of delegate committees.

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12. Memorandum of 3/14/84 from Wava Streeter to Ellen Globokar, and Lisa Estlund, on identities of treasurers of Michigan delegate committees.

13. Memorandum of 3/15/84 from Wava Streeter to Ellen Globokar and Lisa Estlund supplementing the memorandum of 3/14/84 on identities of treasurers of Michigan delegate committees.

14. Notes of Patricia Eltman on legal guidelines on delegate committees.

15. Typed list of disbursements and volunteers of 6th C.D. Delegate Committee, Lansing, Michigan in possession of Patricia Eltman.

16. Handwritten list of same information as #15 in possession of Patricia Eltman.

17. List of delegate committees and treasurers in Michigan in possession of Patricia Eltman. [Note: to the best of our knowledge, many of these committees were never actually formed.

18. List of field staff from Iowa, 22 of whom, based on information from FEC reports, performed volunteer work for New Hampshire delegate committees. The portions of this list which contain confidential personnel information are deleted.

19. Memorandum dated 2/15/84 from William Fleming to delegate and alternate candidates in Florida on compliance with federal and state law.

20. Memorandum in possession of Jesse Guido on permissible activities by Florida delegate committees.

21. Example of campaign literature designed by Jesse Guido for

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use by some Florida delegate committees referred to in response to Int. #17.

22. Examples of campaign literature developed by several delegate committees in Illinois from sample brochure designed by James Margolis, Joyce Deep and MPC volunteers.

RESPONSE TO INTERROGATORIES

General Response

In many instances, these interrogatories use terms, the meaning of which MPC is uncertain. Also, many of the questions require legal conclusions which, at this time and in this context, MPC is unwilling to make. Finally, many of the questions seek information which cannot possibly be relevant to the issue of affiliation. Nevertheless, MPC has endeavored, in good faith, to respond to the Commission's questions by providing information concerning contacts and communications between MPC and Mondale delegates who chose to form committees.

The questions seek information in a level of detail that has been very difficult and sometimes impossible to secure. Most MPC representatives, particularly those engaged in any field work, speak with hundreds of individuals a day, many of whom are potential delegates. Their aim is to mobilize the masses of the electorate. These individuals simply cannot recall the details of each and every conversation they may have had. Where MPC is unable to identify each of these specific communications, these responses identify, to the best of our knowledge, the MPC representative involved. Where we do not have any actual knowledge, we have indicated groups of persons who we believe were likely to

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have received information or communications. While this exceeds normal practice in responding to interrogatories, we have done so in order to be as responsive as possible.

1. (a) and (d)

MPC is uncertain what "organizational assistance in forming delegate committees" means. For this reason, we are responding to #1(a) and (d) together, and providing a general description of the contacts and communications MPC had with delegates concerning delegate committees. Moreover, MPC is unable to distinguish clearly between information provided to delegates and that provided to delegate committees. To the best of our knowledge, in #1 and #2 we describe the activity which pertains to delegates. To the extent that MPC activity is described in response to this question, e.g. provision of compliance information, it is not repeated in response to #5 and #6. To the extent that any more specific information which might arguably be covered by this question is also sought in questions #2 through #18, MPC is providing that information in response to the more specific questions. We have attempted to cross-reference responses where possible.

MPC had a legitimate interest in assuring that its delegates availed themselves of permissible opportunities to further their selection to the Democratic National Convention. This interest was coupled with the belief that there would be full public disclosure of delegate activities, if

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delegates operated through committees rather than as individuals. For these reasons, in January of 1984, MPC decided to inform delegates of their option under FEC regulations to form delegate committees. It was MPC's policy to disseminate as widely as possible information concerning permissible delegate activities. To this end, three memoranda were drafted and distributed. (Doc. #1, 2 and 3.) To the best of our knowledge, these memoranda were always distributed together.

The memoranda were distributed primarily through the following organizational components of MPC: the delegate selection staff, the field operation, and the legal department. No records were kept in any of these areas concerning who received the materials. In addition, MPC representatives, in meeting with delegates, informed them of their right to form committees. Upon request, MPC also provided FEC forms (Statements of Organization and reporting forms) to delegates.

In a few instances we believe that MPC representatives, at the request of particular delegates, recommended individuals who would be willing to serve as volunteer treasurers or finance chair for delegate committees. See response to #10.

Because of the complexities of FEC reporting and other legal requirements, MPC also provided compliance assistance to delegates. In some instances, MPC also referred delegates to volunteer lawyers who could help them directly with compliance matters. See response to #10.

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(b).

No, to the best of our knowledge and belief, as we understand this question.

(c).

No, to the best of our knowledge and belief.

2.(a)

If the contacts and communications described in #1 constitute "assistance," then this question requires a response. Without making that conclusion, we will provide the requested information. MPC representatives had frequent and regular contacts with innumerable individuals who sought to become Mondale delegates. As mentioned in response to #1(a) and (d), it was MPC's policy to encourage widespread distribution of information on permissible delegate activities. Because of the volume of such contacts, we cannot be certain which of these individuals received information as described in response to #1, nor can we identify the precise circumstances.

To the best of our knowledge, MPC provided some of the information described in #1 to at least some delegates in at least the following states:

Alaska
Arizona
California
Colorado
District of Columbia
Florida
Idaho
Illinois
Kansas
Kentucky
Maryland

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Michigan
Missouri
Montana
New Hampshire
New Mexico
New York
North Carolina
North Dakota
Ohio
Oklahoma
Pennsylvania
Rhode Island
Texas
Utah
Virginia
Washington
West Virginia
Wisconsin

There are at least 6700 Mondale delegates in these states. Since MPC cannot identify with any certainty which delegates received the above information, MPC is providing a list of all Mondale delegates in the above-mentioned states.*/ Exhibit 2. (Addresses are provided where they were available to us.) In light of MPC's policy to distribute information concerning delegate committees as widely as possible, we believe it is likely that many of these delegates received the information described in #1.

2.(b) and (c).

For the reasons set forth in response to #2(a), MPC is unable to describe in complete detail the assistance given to each delegate by each MPC representative. To the best of our knowledge, the following MPC representatives provided the information described in #1(a) and (d) to delegates in at least some of the states listed in #2(a). The nature of their assistance is described generally.

*/ Lists of delegates from Kentucky and Virginia will be provided as soon as they are received from the state committees. For some of the other states, the list of names is incomplete. We will supply the remainder of the names as soon as possible.

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JEFF BRAUCKMAN -

Provided memoranda (Doc. #1,2,3) to delegates through a volunteer in Ohio.

MICHELE CARRIER -

Informed a volunteer of option available to delegates in Wisconsin to form a committee; provided memoranda (Doc. #1,2,3) on rules concerning delegate committees to that volunteer who became treasurer of the At-Large Committee.

PAT CARROLL -

Provided compliance information either directly or through another MPC representative to delegates in some or all of the following states: Florida, Virginia, North Carolina, Texas, and West Virginia.

TOM COSGROVE -

Met with delegates in Kansas and informed one or more delegates in Kansas of their option to form committees.

STEVE CUNNINGHAM -

Provided memoranda (Doc. #1,2,3) on rules concerning delegate committees to volunteers in Colorado.

GEORGE DALLEY -

Met with D.C. delegates and informed them of their option to form a committee; provided compliance information to D.C. delegates.

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MARTIN DAVIS -

Provided memoranda (Doc. #1,2,3) to a Mondale delegate in Oklahoma and informed delegate of the option to form a committee.

JOYCE DEEP -

Provided memoranda (Doc. #1,2,3) to delegates in Illinois; met with delegates and informed them of their option to form committees.

THOMAS DEVINE -

Provided memoranda (Doc. #1,2,3) to delegates in Rhode Island and to a volunteer who contacted delegates in Eastern Pennsylvania to inform them of their option to form delegate committees; provided FEC compliance assistance.

WILLIAM FLEMING -

Provided memoranda (Doc. #1,2,3) to delegates through MPC volunteer leadership in congressional districts in California.

GINA GLANTZ -

Provided compliance information in New Hampshire; suggested that a volunteer in Pennsylvania contact delegates and informed them of their option to form committees.

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ELLEN GLOBOKAR -

Suggested that a volunteer in Michigan contact delegates and inform them of their option to form committees.

JESSE GUIDO -

Provided memoranda (Doc. #1,2,3) to delegates in 1st, 2nd, 3rd, 4th, 5th, 11th, 12th, 14th, 15th, 16th, 17th, 18th, and 19th C.D.'s in Florida; met and spoke with these delegates and informed them of their option to form committees and explained the rules governing delegate committees.

WILLIAM HENNESSY -

Met with some N.Y. delegates and informed them of their option to form committees; provided memoranda (Doc. #1,2,3) to delegates through C.D. volunteer coordinators and county chairs; provided FEC compliance information.

DONITA HICKS -

Provided memoranda (Doc. #1,2,3) to delegates in Kansas, Kentucky, Arizona, Oklahoma and Montana.

DAVID IFSHIN -

Provided memoranda (Doc. #1,2,3) on rules concerning delegate committees; provided compliance information.

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JAMES MARGOLIS -

Met with Illinois delegates and informed them of their option to form committees.

MAUREEN MELTON -

Provided memoranda (Doc. #1,2,3) on rules concerning delegate committees; provided compliance information to delegates and volunteers in Ohio.

JOHN O'LEARY -

Informed delegates as they were slated in Western Pennsylvania of their option to form committees.

LYN OLIPHANT -

Provided memoranda (Doc. #1,2,3) on rules concerning delegate committees; provided compliance information; provided FEC forms.

LAURIE PHILLIPS -

Provided memoranda (Doc. #1,2,3) on rules concerning delegate committees; provided compliance information; provided FEC forms.

MELINDA PILLER -

Provided memoranda (Doc. #1,2,3) to delegates in 6th, 7th, 8th, 9th, 10th and 13th C.D.'s in Florida; met with these delegates and informed them of their option to form committees.

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BILLY ROGERS -

Informed delegates in Texas of their option to form committees.

KATHY ROGERS -

Met with NH delegates from 1st and 2nd C.D. after N.H. Caucus and informed them of their option to form committees; provided them with memoranda (Doc. #1,2,3) on rules concerning committees; provided FEC compliance assistance.

SALLY SCHWARTZ -

Provided compliance information to Pennsylvania delegates; informed at least one delegate in Pennsylvania of the option to form a delegate committee.

PETER SLOANE -

Provided West Virginia delegates with memoranda (Doc.#1,2,3) on rules concerning delegate committees; informed delegates of their option to form committees.

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3. We are uncertain as to the meaning and significance of the term "suggestion" in the context of this question. However, MPC, in the course of its frequent contacts with delegates, informed them of their rights under election law to form delegate committees. It was always made clear that the decision as to whether to form such a committee was that of the delegates.

(a) and (b).

For the reasons set forth in response to #1 and 2 above, it is impossible for MPC to describe in complete detail each contact with a delegate or other person in which MPC informed such persons of their option to form delegate committees.

The list of delegates provided in response to #2a encompasses those individuals whom we believe may have received information on forming committees.

(c).

To the best of our knowledge, the following MPC representatives contacted delegates or requested that a volunteer contact delegates in at least the following states and informed them of their option to form delegate committees:

Michele Carrier - Wisconsin
Thomas Cosgrove - Kansas
George Dalley - D.C.
Martin Davis - Oklahoma
Joyce Deep - Illiois
William Fleming - California
Gina Glantz - Pennsylvania
Ellen Globokar - Michigan
Jesse Guido - Florida
William Hennessy - New York
Donita Hicks - Kansas, Kentucky, Arizona, Oklahoma, Montana
James Margolis - Illinois
John O'Leary - Pennsylvania
Melinda Piller - Florida
Billy Rogers - Texas
Kathy Rogers - New Hampshire
Peter Sloane - West Virginia

4. We are uncertain as to the meaning of "seeking assistance in the formation or operation of delegate committees." Moreover, MPC is unable to determine which delegates sought

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information concerning delegate committees and which delegates were provided such information by MPC without a prior request. Often the subject of delegate committees arose during communications with delegates who wanted to know what efforts MPC would make on their behalf and what they could do on their own. The variations in the delegate selection process and recent changes in many state plans precipitated numerous discussions. For this reason, it has not been feasible to determine whether the specific contacts were initiated by delegates or by MPC.

(a) and (b).

For the reasons set forth in response to #2(a) and #3(a), MPC is unable to identify each delegate or other person who requested the information described in response to #1. Similarly, it is also impossible for us to describe in complete detail each such contact. To the best of our knowledge, at least some of the delegates described in #2(a) requested information from MPC.

(c) and (d).

To the best of our knowledge, MPC representatives identified in response to #2(b) and (c) were contacted by at least some of the delegates listed in #2(a) and provided the same general types of information as outlined in response to #2(b) and (c).

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5. (a), (b) and (e).

We are uncertain as to what the Commission means by "assistance." MPC would dispute a contention that every communication or advice would constitute "assistance." MPC did provide information and advice to delegates which is described herein. As stated in response to #1, MPC is unable to distinguish between information which it provided to delegates and to delegate committees. MPC in most instances was not aware of the time when delegates attained political committee status and when they filed statements of organization.*/

For a description of the information MPC provided, see responses to #1(a), #2 and #6(a),(b) and (c). See responses to #10 and #11 as to volunteers; see response to #13 as to vendors; see responses #16, #17 and #18 as to campaign materials.

(c). No, to the best of our knowledge and belief.

(d).

Yes. Because amounts spent on volunteer campaign materials are exempt from the definition of contribution and specifically do not count as expenditures subject to MPC

*/ Although one memorandum distributed to delegates (Doc. #2), suggested that delegate committees forward copies of their statements of organization to MPC, very few did so. Therefore, in April MPC began regularly obtaining copies of their statements and reports from the FEC because of the questions raised concerning delegate committees.

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limit, MPC may assist, coordinate and cooperate with delegate committees on such materials. This activity could not, therefore, under any circumstances be evidence of affiliation.

6.(a),(b)and (c).

In addition to the response to #2 describing information provided by MPC to delegates, MPC representatives provided the information or advice set forth below, and as set forth in #10, 11, 13, 16, 17, and 18.

To the best of our knowledge, the following MPC representatives had the following contacts with delegate committees. The nature of their contacts is described as specifically as possible.

MICHELE CARRIER -

Advised the Wisconsin delegate committee on use of volunteers in grass roots activity.

MARTIN DAVIS -

Advised some Pennsylvania delegate committees on use of volunteers in grass roots activity and distribution of literature.

PATRICIA ELTMAN -

Advised 6th C.D. Michigan delegate committee on use of volunteers in grass roots activity; kept financial records which furthered FEC compliance for 6th C.D. Michigan delegate committee.

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JEFFREY ELY -

Advised delegate committees in Michigan on volunteer phone bank script.

GINA GLANTZ -

In New Hampshire, advised on use of volunteers in grass roots activity and distribution of literature; kept financial records which furthered FEC compliance.

JOHN JAMESON -

Advised the 3rd C.D. delegate committee in Virginia to consider sending telegrams to urge voters to attend caucus.

JAMES MARGOLIS -

Advised Illinois delegate committees on distribution of literature.

KATHY MCGOUGH -

Assisted individuals who performed volunteer work for Oklahoma delegates in receiving per diem reimbursement.

KATHY ROGERS -

Advised Arizona and New Hampshire delegate committees on use of volunteers in grass roots activity and the distribution of literature.

JOSEPH TRIPPI -

Advised some Pennsylvania delegate committees on distribution of literature.

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In some instances, MPC paid certain transportation costs of former MPC field staff who subsequently volunteered for delegate committees.

MPC paid transportation costs of approximately 9 individuals who volunteered for the 6th C.D. delegate committee in Michigan. To our knowledge, there were: Scott Dolley, Colleen Neary, Robin Wright, Debbie Tauger, Beth Harwick, and Joe Sudbay (Boston to Detroit on March 15); Jenny Collins and Laura Tucker (Oklahoma City to Lansing on March 14); and Bruce Keppel (Tulsa to Michigan). All of these individuals subsequently did volunteer work for the 6th C.D. delegate committee.

MPC paid the airfare from Mississippi to Kentucky for two individuals, Angela Jones and Ned McCann, who subsequently did volunteer work for the Kentucky delegate committee.

MPC paid the air fare from Birmingham to Richmond, Virginia on March 19 for Martha Browning and Tommy Wells, and from Waterloo, Iowa to Richmond, Virginia on March 19 for Larry Reid, all of whom subsequently did volunteer work for a delegate committee in Virginia.

MPC paid the air fare from Boston to Springfield, Illinois on March 15 for Beth Sullivan and David Contarino, who subsequently did volunteer work for the 19th and 22nd C.D. delegate committees respectively.

MPC paid the transportation costs from Michigan to New Hampshire for Robin Sorenson, who subsequently did volunteer work for the 2nd C.D. delegate committee in New Hampshire.

MPC paid the air fare from Fort Lauderdale, Florida to

Philadelphia for Alan Quinlan who subsequently did volunteer work for the At-Large Pennsylvania delegate committee, and for Jeff Tittle who subsequently did volunteer work for the delegates committee in Reading, Pennsylvania.

7. MPC is uncertain as to the difference between the information sought in #7 and #8. MPC is uncertain as to how the Commission currently defines the term "solicitation." Thus, in an effort to provide full information to the Commission despite this uncertainty, MPC is responding to #7(a) and (b) in its answer to #8, and is setting out facts without attempting to characterize whether or not they constitute a solicitation. To the extent that #7 requests information not included in #8, the information is provided below.

(a) See response to #8(c).

(b) See response to #8(a).

(c).

There was no formal authorization of the communications described in #8, but there was some knowledge or approval of the communications in the campaign staff hierarchy of the limited amount of activity mentioned in #8.

(d).

To the best of our knowledge and belief, there were no criteria used in making the communications described in #8.

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(e).

MPC cannot identify with any certainty each delegate committee which received funds as a result of MPC contacts other than the New Hampshire delegate committees which received contributions from at least some individuals or entities which were contacted by MPC. In addition, we believe that some Illinois, Pennsylvania, Virginia, Michigan, and Florida committees also received funds because of MPC contacts, but cannot provide specific information as to which ones.

8. (a), (b), and (c).

MPC cannot identify with any certainty each person who was contacted regarding contributions to delegate committees, because no records were maintained. However, to the best of our knowledge, the following describes MPC communications concerning contributions to delegate committees.

MARTIN DAVIS

Contacted 1 individual and suggested a contribution to the 13th C.D. delegate committee in Pennsylvania.

TIMOTHY FINCHEM -

Encouraged MPC representatives and volunteer fundraisers to support delegate committees only in areas which would not conflict with MPC fundraising; actively discouraged MPC encouragement of contributions to delegate committees, particularly in Pennsylvania and Florida.

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GINA GLANTZ -

Contacted 1 individual and suggested a contribution to a New Hampshire delegate committee.

DAVID IFSHIN -

Upon request of an individual, Mr. Ifshin provided the name of a delegate committee to which he could contribute.

PAUL JENSEN -

In the course of speaking to representatives of union political action committees, encouraged support of delegate committees. MPC cannot identify with any certainty the names of each labor representative with whom Mr. Jensen spoke because of the volume of his conversations with such persons on a variety of topics. These telephone calls were routinely initiated both by Mr. Jensen and by labor representatives. Mr. Jensen regularly speaks to representatives of the 96 unions which have endorsed Mr. Mondale and with the presidents of the state federations of labor. The names of the labor representatives with whom he speaks most frequently, and with whom the issue of delegate committee contributions are most likely to have been raised, are attached as Exhibit 3.

NANCY KUHN -

Contacted approximately 10 individuals and suggested that they contribute to delegate committees in New

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Hampshire.

JIM MARGOLIS -

Contacted about 5 contributors suggesting contributions to some Illinois delegate committees.

DON MUIR -

Contacted 15 or 16 individuals in California and suggested that they contribute to delegate committees in New Hampshire.

MELINDA PILLER -

Contacted 2 contributors suggesting contributions to Florida delegate committees.

AMY ROSEN AND CURT WILEY -

Contacted by telephone a limited number of individuals and suggested that they contribute to delegate committees in New Hampshire. To the best of her recollection, Ms. Rosen made no more than 20 calls. To the best of his recollection, Mr. Wiley made no more than 8-10 calls. They also informed some MPC volunteer fundraisers of the existence of delegate committees and MPC's encouragement of them. MPC believes that these individuals contacted people of their own choosing and suggested that they contribute to delegate committees.

IRENE TRITCHLER -

Contacted a small number of individuals in California and suggested that they contribute to delegate commit-

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tees in New Hampshire.

(d).

MPC cannot identify with any certainty when these contacts occurred, but to the best of our knowledge, they were made in the following time frames:

Martin Davis -- March
Timothy Finchem -- February - March
Gina Glantz -- mid-February
David Ifshin -- March
Paul Jensen -- February - March
Nancy Kuhn -- mid-February
Jim Margolis -- early to mid-March
Don Muir -- mid-February
Melinda Piller -- March
Amy Rosen -- mid-February
Irene Tritchler -- mid-February
Curt Wiley -- mid-February

(e).

The 1st and 2nd District New Hampshire Delegate Committees. MPC cannot identify with any certainty the identity of any other specific delegate committees; however, we believe that at least some committees in Pennsylvania, Illinois, Virginia, Michigan, and Florida were suggested to contributors or potential contributors.

9. To the best of our knowledge and belief, the answer is no.

10. (a), (b), and (c).

MPC assisted some volunteer field organizers*/ in contacting some delegate committees which requested the

*/ These field organizers customarily received per diems for expense reimbursement.

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assistance of such organizers. We cannot identify with any certainty each delegate committee to whom field volunteers were recommended. However, we believe this occurred in at least some committees in the following states:

Illinois
Kansas
Kentucky
Michigan
Montana
New Hampshire
Oklahoma
Pennsylvania
Virginia
Wisconsin

The following MPC representatives recommended these volunteers in conversations with delegate committees:

Michele Carrier - Wisconsin
Thomas Cosgrove - Kansas
Martin Davis - Pennsylvania, Oklahoma
Joyce Deep - Illinois
Patricia Eltman - Michigan
Gina Glantz - New Hampshire
Donita Hicks - Montana, Kansas, Kentucky
John Jameson - Virginia
James Margolis - Illinois
Kathy McGough - Oklahoma

In addition, in one instance, George Dalley upon request of the D.C. delegate committee, recommended an individual to serve as a volunteer finance director for that committee.

In many states, MPC upon request, referred delegate committees to lawyers who were willing to assist them in complying with FEC requirements. The following MPC representatives recommended volunteer lawyers:

Thomas Devine
David Ifshin
James Margolis
Lyn Oliphant

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In a few instances, MPC representatives also recommended individuals who would be willing to serve as treasurers to delegate committees:

Kathy Rogers - New Hampshire delegate committee
Sally Schwartz - 1st C.D. Pennsylvania delegate committee

In addition, John Jameson asked a volunteer to recommend a treasurer to the 2nd C.D. Virginia delegate committee.

It must be noted that in every instance described above, delegate committees made their own decisions as to whether or not to accept the individual volunteers.

(d).

Some delegate committees sought names of volunteers on their own initiative. In some cases, there were requests for names which were not met. We cannot identify with any certainty each committee which sought such assistance. At least some delegates or committees in at least the following states initially sought such assistance from MPC:

Illinois
Michigan
Montana
New York
Ohio
Pennsylvania

In New Hampshire, MPC recommended several volunteers who were readily accepted by the delegate committees because local volunteers were somewhat difficult to find.

11. (a),(b) and (d).

Sometime during the week following the Iowa caucuses, a decision was made that some field volunteers who had been

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utilized in Iowa would not be reimbursed for expenses or receive per diems in New Hampshire. MPC referred many of these individuals to delegate committees. Some of them subsequently worked for delegate committees. It was made clear to these individuals that they would no longer be working for MPC. We are aware that in some instances, e.g., Pennsylvania and New Hampshire, some former MPC volunteers who were not referred to delegate committees by MPC nevertheless worked for delegate committees.

(c).

The following MPC representatives referred former field workers to delegate committees:

Michele Carrier - Wisconsin
Patricia Carroll - Virginia
Thomas Cosgrove - New Hampshire
Martin Davis - Pennsylvania, Oklahoma
Patricia Eltman - Michigan
Jeffrey Ely - Michigan
Donita Hicks - Montana, Kansas, Kentucky
John Jameson - Virginia
Matthew Macwilliams - Michigan, Wisconsin, New Hampshire, Illinois
James Margolis - Illinois
Kathy McGough - Oklahoma
Kathy Rogers - New Hampshire
Sally Schwartz - Pennsylvania, New Hampshire

12. Other than as outlined in response to #10, #11 and #13, to the best of our knowledge the answer is no.

13. (a),(b),(c),(d),(e) and (f).

To the best of our knowledge and belief, in a few instances MPC representatives recommended printers to delegate committees. Where possible, we have identified the printer and the delegate committee to which the

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recommendation was made.

STEVE CUNNINGHAM -

Recommended B.C. Printing, Denver, Colorado, to the Colorado delegate committee.

MARTIN DAVIS -

Recommended 2 printers to the Pennsylvania At-Large delegate committee.

JESSE GUIDO -

Recommended Lloyd's Printing, Hollywood, Florida to Florida delegate committees in the 1st, 4th, 10th, 14th and 16th C.D.'s, and Sharon's Printing, Del Ray Beach, Florida, to Florida delegate committees in the 7th, 12th and 13th C.D.'s.

JAMES MARGOLIS -

Recommended to the Illinois delegate committees in the 1st, 2nd, 4th, 6th, 7th, 9th, 10th, 11th, 12th, 13th, 14th, 16th, 17th and 22nd congressional districts that cheaper rates might be obtained by arranging for one printer to print the flyers for all of the committees. Therefore, he recommended Progress Printing.

KATHY ROGERS -

Recommended Keystone Press to the Second District Delegates for Mondale Committee in New Hampshire and a printer to the Arizona delegate committee.

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To the best of our knowledge, the printers recommended had no role in the design or content of literature, and they were not recommended because they had been or were MPC vendors. To the best of our knowledge, with the exception of Sharon's Printing and Keystone Press, MPC did not use any of the other printers named above. MPC used Sharon's Printing twice for printing at a total cost of $196.00, and used Keystone Press on a very limited basis. To the best of our knowledge, we are unaware of any other situations in which vendors were suggested to delegate committees by MPC.

14. (a), (b), (c) and (d).

To the best of our knowledge, there were only two instances in which an MPC representative made available to a delegate committee any MPC contributor lists or files. MPC's policy generally is not to release its contributor lists or portions thereof to other organizations.

At the request of the D.C. Mondale Delegate Committee, George Dalley made available a list of no more than 50 MPC contributor names to the committee.

In Florida, there was direct conflict between MPC fundraising and delegate committee fundraising. Because of this, Bill Fleming and Jesse Guido provided the Florida delegate committees with a list of maxed-out MPC contributors. They also urged the committees not to engage in fundraising which would interfere with MPC's fundraising.

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See also Docs. #5 and #7 regarding Florida delegate annoyance at MPC.

15. Some committees asked MPC representatives what they could do legally with excess funds.

(a).

We cannot identify each suggestion or recommendation. Generally, however, delegates who sought information were informed:

(1) that they could make contributions of up to $5000 to other delegate committees;

(2) that they could refund any PAC contributions that they received; and

(3) that they could use the funds to defray the convention expenses of the delegates selected.

(c) and (d).

We cannot identify with any certainty the delegate committees who were advised of the permissible uses of excess funds, nor the dates on which such information was sought, except as follows: the 1st and 2nd C.D. committees in New Hampshire, the Kentucky committee, and the Montana committee. At least some committees in the following states also sought such information:

Florida
Illinois
Michigan
Pennsylvania

Some time during March or April we were advised that some delegate committees were calling the FEC to ask what

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they could do with excess funds. MPC's legal department was informed by some delegate treasurers who called MPC to confirm the legality of the FEC advice that contributions could be made to other committees of up to $5,000. We cannot recall the identities of the delegates who informed us of this. To the best of our knowledge and recollection, however, they were from Illinois, Pennsylvania and Florida.

16. We are not aware of any instances in which MPC requested or suggested that delegate committees submit their literature to MPC prior to distribution.

17. (a),(b),(c), and (d).

To the best of our knowledge, the following is a description of MPC contacts with delegate committees concerning the design of or message contained in volunteer campaign materials:

JOYCE DEEP -

In Illinois, Ms. Deep, Mr. Margolis and a couple of MPC volunteers designed a sample brochure. This literature was used by approximately 14 delegate committees. A copy is provided as Doc. #22.

MICHAEL FORD -

In Pennsylvania, Mr. Ford was shown some literature by the At-Large delegate committee. He made some suggestions on the literature and also discussed where the literature might be distributed most effectively.

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JESSE GUIDO -

In Florida, Ms. Guido assisted in design of a slate card which was used by several delegate committees and which included personalized information on the delegates. (Doc. #21)

WILLIAM HENNESSY -

In New York, Mr. Hennessey discussed design, content and distribution of At-Large delegate committee literature with committee representatives.

JAMES MARGOLIS -

See response concerning Ms. Deep.

KATHY ROGERS -

In Arizona, Ms. Rogers designed a sample brochure which was utilized by the delegate committee.

18. Other than as set forth in response to #17, we are unaware of any review by MPC of delegate committee campaign materials prior to distribution.

Respectfully submitted as to objections,

David M. Ifshin
General Counsel

Patricia A. Fiori
Special Counsel

Carolyn U. Oliphant
Deputy General Counsel

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I am treasurer of Mondale for President Committee, Inc. The foregoing answers to interrogatories were prepared with the assistance and advice of counsel for the corporation, upon whom both the corporation and I rely. Although said answers have been made upon information believed to be accurate, the interrogatories request information in forms not regularly maintained by Mondale for President Committee, Inc. Subject to the statements hereinabove set forth:

I declare under penalty of perjury that: I am authorized to sign these responses on behalf of Mondale for President Committee, Inc.; as to the foregoing responses based on information and belief, I believe them to be true and correct; and, as to the foregoing responses based on my personal knowledge, they are true and correct.

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Michael S. Berman
Treasurer
Mondale for President
Committee, Inc.

Mondale for President
2201 Wisconsin Avenue, N.W.
Washington, D.C. 20007
Telephone: 202-625-1800

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 Beckel
Campaign Manager

Paid for by Mondale for President, Inc.

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

MONDALE

MEMORANDUM

January 6, 1984

RE: Delegate Expenditure Committees

FROM: David Ifshin
Lyn Oliphant

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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

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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.

I. 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.

8504505

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

Paid for by Mondale for President, Inc.

Mondale for President
2201 Wisconsin Avenue, N.W.
Washington, D.C. 20007
Telephone: 202-625-1800

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.

8504055

Memorandum

February 8, 1984

TO : Bob Beckel, Paul Tully, Tom Donilon, Tony Corrado
Mike Ford, Glen Cowan - Desk Officers
Mike Berman, David Ifshin
Elaine Kamarck
Paul Jensen

FROM : Tim Finchem

RE : Delegate Committee Fundraising

3504537

The purpose of this memorandum is to outline and reaffirm our campaign-wide understanding on delegate committee fundraising. As we have discussed, we only want to encourage delegate committee fundraising in ways and in areas where it does not conflict with our existing fundraising schedule. The reason for this is that conflicts will result in an inability to attain our projected revenues upon which we plan campaign operations, including media buys.

Therefore, we have all agreed to pursue as a priority the encouragement of fundraising for the New Hampshire delegate committees, and to place all other such fundraising on the back burner. However, as I have indicated, there are areas in the other immediately affected states (Illinois, Pennsylvania, Florida and Massachusetts) and other entire states in which delegate fundraising is not a problem. Therefore, I would like to outline those areas where fundraising can now be encouraged without the danger of conflict:

1. Illinois - everything outside of the Chicago metropolitan area.
2. Pennsylvania - we have fundraising schedules in all of the CD's located in the Pittsburgh and Philadelphia metropolitan areas, therefore, any delegate fundraising encouraged now should be limited to these parts of the state outside of these metropolitan areas.

3. Florida - Florida is the best example of unbridled fundraising creating significant conflicts and misunderstandings with the result being that the campaign raises less and delegate fundraising is ineffective. Therefore, until further notice, all delegate fundraising should be discouraged in the Miami, Lauderdale, Jacksonville and Tampa metropolitan areas.
4. Massachusetts - we have a major, state-wide tiered event on February 28th. All other fundraising should be discouraged totally.

In these states all delegate fundraising is appropriate:

Alabama, Georgia (outside of the Atlanta area), Oklahoma, Arkansas, Washington, Michigan, Hawaii, Nevada, Wyoming, Delaware, Alaska and Vermont.

With respect to any other states, please check with me or my staff.

8504030455 3

[illegible] Avenue, S. E.
[illegible], D.C. 20003
[illegible] 202-625-1600

MONDALE

MEMORANDUM

TO: Bill Fleming, Florida
Gina Glantz, Pennsylvania
Jim Margolis, Illinois

FROM: Bob Beckel, Tim Finchem

DATE: 1/30/84

SUBJECT: Delegate Expenditure Committees

Although Delegate Committees are being set-up in your states, we would like to emphasize that the first priority for the Mondale Campaign in each state must be to raise money for the Mondale Presidential Campaign.

There are several important reasons for this. First, and foremost, is that money raised for our campaign can be matched by the federal government whereas money raised by delegate committees is not matchable. Secondly, money from media must come from the Mondale Campaign and not from delegate committees.

Therefore, we suggest to you to urge our delegate committees to raise money from only those people who have maxed out to the Mondale Campaign. To aid those committees, we are enclosing a list of maxed out contributors from your state.

In addition, we would like to be informed of any fundraising efforts by these committees. Do not schedule any fundraising event without checking with the National campaign fundraising office--Curt Wiley or Amy Rosen (202/625-1692).

8504552

MONDALE

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

Memorandum: In House
Date: February 17,1984
From: William J. Fleming
To: Jim Quackenbush

8504045 60

MONDALE

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

Memorandum continued: page 2

3504050455!

Overview of the State Campaign Organization

Briefly, the following elements of the primary campaign are in place.

All C.D.'s have organized Delegate Slate Camapign Committees, designated a chairperson and treasurer and a bank depository. Each committee will have filed a treasurer's report with the FEC with copies to the Florida State Supervisor of Elections by February 21.

In most of the C.D.'s active Volunteer Steering Committees are organized with volunteers. In C.D.'s with many counties, several Volunteer Steering Committees have been formed.

The Delegate Slate Committees have received some contributions from labor PAC as well as donations from the delegates themselves. The Committees are in the process of developing literature geared to ballot education and the election of the entire slate of delegates and alternates.

MONDALE

Mondale for President
2201 Wisconsin Avenue, N.W.
Washington, D.C. 20007

Memorandum continued: page 3

The delegate campaigns are sending clippings to the State H.Q. on a regular basis and providing information regarding the activity of Glenn, Jackson and Askew campaigns and appearances in the state.

3504562

Florida

February 17, 1984

MEMORANDUM

TO: Jim Quackenbush

FROM: Amy Rosen

RE: Florida

Per our discussion last night, here's what I think events will look like:

Jacksonville

8504030456 3

As you know, there has been animosity on the part of our delegate slate that we are coming here to raise money for the national campaign. While at the last minute I am sure that the delegates will be invited to attend, currently we are keeping the pressure on them to buy and sell tickets rather than to sabotage the event, which they have tried to do in both Jacksonville and Miami.

Miami

Everybody involved in these events has met enormous resistance from our local delegates and labor, both of which have not only provided no assistance but have tried to sabotage the event because of there desire to raise money for their local delegate slates instead.

3504030455

8504050456

dictated to SMW 2/17

cc: Pat Carroll
Katy Whelan

TO: Political Accounts, Bell Operating Companies
FROM: Michael Roth National Telecommunications Coordinator, Mondale for President Campaign
SUBJECT: Delegate Selection Committees
DATE: 26 March 1984

Local operating companies are advised that Delegate Selection Committees for Mondale are being formed. The purpose of these committees are to elect specific delegate candidates to the Democratic National Convention.

These delegate selection committees are independant of the Mondale for President Committee. The Mondale for President Committee is not responsible for placing orders, providing deposits or making payments on orders placed by delegate selection committees.

- Orders for service will not be handled by the National Campaign Coordinator.
- Deposits will not be secured by the Letter of Credit backing the National Payment Agreement.
- Payment for service and tolls will not be handled by the National Campaign Coordiantor, nor will bills be paid for these accounts by the Mondale for President Campaign.
- "Mondale for President" is not to be used as either a billing or service name.
- Local operating companies are requested to inform the National Campaign Coordinator of service requests.
- Local operating companies are advised to request letters stating that the delegate committe are a seperate legal entity from the Mondale for President Campaign. The Mondale for President Campaign will provide a similar letter when requested.

Further information may be optained from the National Campaign Coordinator, James Steinhagen of Northwestern Bell (612/344-8888) or Michael Roth of the Mondale for President Campaign (202/625-1750).

8504050456

Law Offices
BRIAN E. BARKLEY, P.A.
GBS BUILDING, SUITE 406
51 MONROE STREET
ROCKVILLE, MARYLAND 20850
301-424-8800

[illegible] TO PRACTICE IN
MARYLAND AND THE
DISTRICT OF COLUMBIA

March 21, 1984

Michael Roth
Mondale for President
2201 Wisconsin Avenue, N.W.
Washington, D.C. 20007

Dear Michael:

Thank you for your letter of March 18, 1984 wherein you state that the Maryland 8th Congressional District Delegate Committee (also known as Montgomery County for Mondale) has no connection with the Mondale for President Committee. I am writing to confirm this understanding.

Thank you for your assistance in clarifying this matter.

Sincerely,

Brian E. Barkley

BEB:mec

8504050567

Northwestern Bell
Room 495
200 S. 5th Street
Minneapolis, MN 55402
March 28, 1984

POLITICAL ACCOUNT GROUPS
BELL OPERATING COMPANIES

SUBJECT: DELEGATE SELECTION COMMITTEES

Local operating telephone companies are advised that Delegate Selection Committees for Mondale are being formed. The purpose of these committees is to elect specific delegate candidates to the Democratic National Convention.

These delegate selection committees are independent of the Mondale for President Committee. The Mondale for President Committee is not responsible for placing orders, providing deposits or making payments on orders placed by delegate selection committees.

- Orders for service will not be handled by the National Campaign Coordinator.
- Deposits will not be secured by the Letter of Credit backing the National Payment Agreement.
- Payment for local service and toll calls will not be handled by the National Campaign Coordinator, nor will bills be paid for these accounts by the Mondale for President Committee.
- "Mondale for President" is not to be used as either a billing or service name.
- Local operating companies are requested to call and inform the National Campaign Coordinator of service requests.
- Local operating companies are advised to request letters stating that the delegate committees are a separate legal entity from the Mondale for President Committee. The Mondale for President Committee will provide a similar letter when requested.

Further information may be obtained by calling my office, 612 344-8888, or Michael Roth of the Mondale for President Committee 202 625-1750.

Sincerely,

James N. Steinhagen
National Campaign Coordinator

ar

8504050453

CD 1 Delegates for Mondale

TREASURER Gordon Pennington
7830 North Halifax Street
Pensacola, Florida 32514

904/477-5924 (h)
904/477-1859

8504050457

February 8, 1984

OK
2/15

MEMORANDUM

To: Congressional District Mondale Campaign Committees
From: Jesse Guido

Would you please send us the following information as soon as possible:

1. Name of your committee as filed with FEC

CONGRESSIONAL DISTRICT 2 DELEGATES FOR MONDALE

2. Chairperson - Name: John Schorger
Address: 1812 Indian Head Drive West
Phone #: Tallahassee 32301
904/877-4794

3. Treasurer - Name: Josephine Conte
Address: P.O. Box 10403
Phone #: Tallahassee FL 32302
904/488-6217 (O)

8504030045 7 0

February 8, 1984

MEMORANDUM

OK
2/15

To: Congressional District Mondale Campaign Committees
From: Jessie Guido

Delegates for Mondale 3rd. C.D.

Would you please send us the following information as soon as possible:

1. Name of your committee as filed with FEC:

2. Co-Chairperson - Name: Don Gaffney
   Address: 5633 Cleveland
   Jacksonville, Fl 32209
   Phone #: 904/765-5648 (H)
   633-3683 (O)

   Delegates - Name: Luann Bennett
   Address: 1762 Belmonte Ave.
   Jacksonville Fl 32207
   Phone #: 904/396-7729 (H)
   396-4063 (O)

3. Treasurer - Name: Sam C. Catherwood
   Address: P.O.Box 8796 Jacksonville, Fl. 32211
   Phone #: 904/743-2455 (O)
   744-1190 (H)

8504050457

February 8, 1984

MEMORANDUM

To: Congressional District Mondale Campaign Committees
From: Jesse Guido

Would you please send us the following information as soon as possible:

1. Name of your committee as filed with FEC

C.D. 5 Delegates for Mondale

2. Chairperson - Name: Linda Stewart
Address:
Phone #:
305/273-3928

3. Treasurer - Name: Cheryl Frazier
Address: 1310 W. Colonial Dr. #29
Phone #: Orlando, Fl. 32804
305/657-2008
423-4552

8504090457 2

February 8, 1984

MEMORANDUM

To: Congressional District Mondale Campaign Committees
From: Jesse Guido

Would you please send us the following information as soon as possible:

1. Name of your committee as filed with FEC

CONGRESSIONAL DISTRICT 6 DELEGATES FOR MONDALE

2. Chairperson - Name: Brenda McCaslin
Address: P.O. Box 365
Phone #: Gainsville, FL 32615
904/462-1858 (H)
377-7635 (O)

3. Treasurer - Name: Carl Horner
Address: 2375 S.W. College Road
Phone #: Ocala FL 32674
904/732-7383 (O)

8504050457

February 8, 1984

MEMORANDUM

To: Congressional District Mondale Campaign Committees
From: Jesse Guido

8504050457 1

Would you please send us the following information as soon as possible:

1. Name of your committee as filed with FEC

CONGRESSIONAL DISTRICT 7 DELEGATES FOR MONDALE

2. Chairperson - Name: YVONNE SCHOMBER
Address:
Phone #: 8711 N. 34th Street
Tampa FL 33604
813/985-2047 (H)
988-5171 (O)

3. Treasurer - Name: Jim Ghiotto
Address: 1915 Alline Avenue
Phone #: Tampa FL 33611
813/837-3486 (H)
974-2591 (O)
238-8411 (O)

February 8, 1984

MEMORANDUM

To: Congressional District Mondale Campaign Committees
From: Jessie Guido

Would you please send us the following information as soon as possible:

1. Name of your committee as filed with FEC

MONDALE DELEGATES CONGRESSIONAL DISTRICT 8

2. Chairperson - Name: Greg Duckett
Address: 1500 Aohambra Way South
Phone #: St. Petersburg FL 33705
813/866-1508 (H)
898-7451 (O)

3. Treasurer - Name: Sue Moore
Address: 94 Baywood Avenue
Phone #: Clearwater FL 33575
813/ 799-1250 (H)
584-7173 (O)

8504050457

February 8, 1984

MEMORANDUM

To: Congressional District Mondale Campaign Committees
From: Jessie Garido

Would you please send us the following information as soon as possible:

1. Name of your committee as filed with FEC

CONGRESSIONAL DISTRICT 9 DELEGATES FOR MONDALE

2. Chairperson - Name: Marilyn Hackworth
Address: 1630 Santa Barbara Drive
Phone #: Dunedin, FL 33528
813/733-7062 (H)
446-1136 (O)

3. Treasurer - Name: La Vaunne Miller
Address: 24 Meadow Lark Lane
Phone #: Land O' Lakes FL 33539
813/996-2119 (O)
848-1385 (O)
996-6803 (H)

8504004575

February 8, 1984

MEMORANDUM

To: Congressional District Mondale Campaign Committees
From: Jesse Guido

Would you please send us the following information as soon as possible:

1. Name of your committee as filed with FEC

CONGRESSIONAL DISTRICT 10 DELEGATES FOR MONDALE

2. Chairperson - Name: Dick Brumbough
Address: 655 East Peirce Street
Phone #: Lake Alfred, FL 33850
813/956-2430 (H)

3. Treasurer - Name: Bernard Shingle
Address: 5520 2nd Avenue Drive West
Phone #: Bradenton 33529
813/792-5559 (H)

8504030045577

February 8, 1984

MEMORANDUM

To: Congressional District Mondale Campaign Committees
From: Jesse Guido

Would you please send us the following information as soon as possible:

1. Name of your committee as filed with FEC

C.D.(Congressional District)12 Delegates For Mondale

2. Chairperson - Name: George Hudspeth, Jr.
Address: 8935 112th Terrace, North
Phone #: Lake Park, FL 33410
305/833-2461

3. Treasurer - Name: Nancy Miller
Address: 2129 Holland Street
Phone #: St. Lucie, FL 33457
305/335-8040 (h)

8504504573

February 8, 1984

MEMORANDUM

To: Congressional District Mondale Campaign Committees
From: Jesse Guido

MONDALE DELEGATES CONGRESSIONAL DISTRICT 13

Would you please send us the following information as soon as possible:

1. Name of your committee as filed with FEC

2. Chairperson - Name: Dorothy Bedell
   Address: 173 Coral Drive
   Phone #: Fort Myers, FL 33905
   813/694-5574 (H)

3. Treasurer - Name: Harry Cunningham
   Address: 1171 Crayton Road
   Phone #: NaplesL 33940
   813/262-1226 (H)
   262-3990 (O)

Melinda Greiner
1625 Winkler Ave
Ft Myers. FL 33901

8504030457?

February 8, 1984

MEMORANDUM

To: Congressional District Mondale Campaign Committees
From: Jesse Guido

8504045937

Would you please send us the following information as soon as possible:

1. Name of your committee as filed with FEC

~~Mondale~~ 14th C.D. Delegate for Mondale

2. Chairperson - Name: Henry Handler
   Address: 6797 Entrada Pl.
   Phone #: Boca Raton, Fl. 33433

3. Treasurer - Name: Comerford
   Address: ~~George Comer Ford~~ 5844 Western Way
   Phone #: Lake Worth, Fl. 33463
   305/965-5844
   684-4848

February 8, 1984

MEMORANDUM

To: Congressional District Mondale Campaign Committees
From: Jesse Guido

Would you please send us the following information as soon as possible:

1. Name of your committee as filed with FEC

Mondale 15th District Delegate Committee

2. Chairperson - Name: George Platt
Address: 440 S. Andrews
Phone #: Ft. Lauderdale, Fl. 33301
305/462-2800 (O)

3. Treasurer - Name: Bob Parks
Address: 440 S. Andrews
Phone #: Ft. Lauderdale, Fl. 33301
305/462-2800 (O)

8504059 81

February 8, 1984

MEMORANDUM

To: Congressional District Mondale Campaign Committees
From: Jesse Guido

8504030459 8

Would you please send us the following information as soon as possible:

1. Name of your committee as filed with FEC

Mondale 16 District Delegate Committee

2. Chairperson - Name: Congressman Larry Smith
Address:
Phone #:

* Steering Comm. Chair: Ron Aaronson - Comm. Howard Forman
(Send information to:) c/o John Hancock Ins.
2450 Hollywood Blvd.
Suite 301
Hollywood, Fl. 33020
305/921-7500 (O)

3. Treasurer - Name: Angelique Stahl
Address: 1 Corporate Plaza (18fl.)
Phone #: Broward Federal Savings & Loan Association
305/357-9000 (O)
305/563-3171 (H)

* Deputy Treas:
(Send checks to:) Frank Ortis
11621 N.W. 23rd, Street
Pembroke Pines, Fl. 33026
305/431-3982 (H)
305/761-8110 (O)

February 8, 1984

MEMORANDUM

To: Congressional District Mondale Campaign Committees
From: Jesse Guido

8504050458 3

Would you please send us the following information as soon as possible:

1. Name of your committee as filed with FEC

SOUTH FLORIDA DELEGATES FOR MONDALE

(17, 18, 19 — mainland)
CDS

2. Chairperson - Name: Virginia Conger
Address: 5050 Biscayne
Phone #: Miami, Fl. 33137
305/756-0173

3. Treasurer - Name: Robert Shugarman
Address: 1951 N.W. 17th Ave.
Phone #: Miami, Fl. 33125
305/325-1661 (O)
305/932-3011 (H)

February 8, 1984

MEMORANDUM

To: Congressional District Mondale Campaign Committees
From: Jesse Guido

Would you please send us the following information as soon as possible:

1. Name of your committee as filed with FEC

Florida Keys
DELEGATES FOR MONDALE 19 C.D. ~~KEY WEST~~

2. Chairperson - Name: Fred Butner
Address: Box 1708
Phone #: Key West, FL 33040
305/294-55-9
294-5505

3. Treasurer - Name: Gerald Saunders
Address: 515 Duval Street
Phone #: Key West, FL 33040
305/294-7939 (O)

8504050458 1

MEMORANDUM

TO: Ellen and Lisa

FROM: Wava Streeter

DATE: March 14, 1984

The following people have agreed to be Treasurer and to form a delegate committee:

5th District:

H. David Soet (616-451-8496)
1400 McKay Tower
Grand Rapids, Mi. 49503
BANK: Michigan National Bank Central
Grand Rapids, Mi.

6th District:

Larry Owen (517-487-2070)
Miller, Canfield, Paddock & Stone
One Michigan Ave.
Lansing, Mi. 48933
BANK: Capitol National Bank
Lansing, Michigan

16th District:

Christopher E. Smith (313-963-2340)
1632 First National Bldg.
Detroit, Mi. 48226
BANK: _____

18th District:

Donald Tucker (313-353-3890)
26911 Northwestern
Suite 400
P.O. Box 5073
Southfield, Mi. 48086
BANK: Franklin Savings & Loan

8504050458

15th District:

Patricia Tallmadge (313-722-1411)
34451 Harroun
Wayne, Michigan 48184
BANK: Wayne Bank
Wayne, Michigan

NOTE: Pat will be in Florida for two weeks - if you need checks, you can contact Clare Lavers in Pat's office. She is leaving signed checks with Clare.

8504050459 6

MEMORANDUM

TO: Ellen and Lisa

FROM: Wava Streeter

DATE: March 15, 1984

(SUPPLEMENT TO YESTERDAY's MEMO RE: Forming Delegate Committees)

7th District:

S. Olof Karlstrom (313-239-2236)
512 W. Court 232-0114
Flint, Mi. 48502 766-7146 (City of Flint)
BANK: Genessee Merchants
Flint, Mi.

12th District:

Charles A. Mancini (313-751-3900)
28225 Mound Rd.
Warren, Mi. 48092
BANK: Bank of Commerce
Warren, Mi.

14th District:

Ellen Schreuder (313-751-3900)
28225 Mound Rd.
Warren, Mi. 48092
BANK: Bank of Commerce
Warren, Mi.

NOTE: These people have also been sent the memo and the State of Organization form.

8504050457

42-[redacted] 1990

Peter Spiller → (313) 222-0500

Del Comm → Separate existence - legal reality

at least

① urging election of real live person
Single out these people
the best way to elect Jim Jones
6th District.

② Separate fin existence
Treasurer - person doing finances
do not sign blank checks
give directly
3 people on Exec Dist Del
Advisory election.

Larry Owen - Treasurer

(517) 790-[redacted] 5917 Tom Franks Pres.

6th Shelby Coleman
Susan E. Jones
Elizbeth Eklund

8504050459?

SUMMARY

6th District Delegates for Mondale Committee , Lansing,

Larry Owen , Treasurer

8504050458 2

6th District Delegates for Mondale Committee

Treasurer:

Larry Owen, Esq.
6th District Delegates for Mondale Committee
Miller, Carfield Paddack and Stone
One Michigan Avenue
9th Floor
Lansing, Michigan 48933

The 18th District Delegates for Mondale Committee was never ac

Check was Returned to Paul Jensen. $3000.

New Hampshire Committee check was destroyed--Per Gina Glantz...

8504050459

WHERE MICHIGAN DELEGATE COMMITTEE STAFF CAN BE REACHED

Koppel-Home DSM Iowa

Mike Martin -Home Lansing

Andy Meyers-WFM Office Chicago

Deb Tauger-WFM Office Chicago

Beth Harwick-Chicago WFM Office

Robin Wright-WFM Office -Chicago

Scott Dolley-WFM Office-Chicago

Jennifer Collins--Home DSM-Iowa

Coleen Neary-312-929-3564

Lenny Stern--D.C.

Joe Sudbay-D.C.

Goeff Burns-Lansing-517-483-1156

8504030459

CHECK DISBURSEMENT

CHECK #1-Mike Martin-5 days PD + $15 Gasoline = $90.00

#2 Bruce Koppel - $160 Pay + $41.85 Expenses=$201.85

#3 United Airlines $207.00 Airfare from Lansing to DSM

#4 Mary Addison $50.50 Reimbursement for paying Koppel's hotel bill.

#5 Jennifer Collins-$160. pay $15.51 Expenses=$175.51.

#6 Goeff Burns-$145.00 Pay.

#7-Andy Meyers $145. Pay + $27.25 Greyhound to Chi=$172.25.

#8-Deb Tauger-$90.00 pay + $27.25 Greyhound--$117.25.

#9 Beth Harwick--$90.00 Pay + $27.25 Greyhound =$117.25

#10--Robin Wright-$242.25 Pay + $27.25 Greyhound (Inc.)

#11-Travel Lodge-Housing $358.95.

#12-Laura Tucker $90.00 Pay + $27.25 Greyhound to Chi. = $117.25

#13 Scott Dolley-$242.25 5 days pay plus $27.25 Greyhound (Inc.)

#14-Coleen Neary-$90.00 Pay plus $27.25 Greyhound to Chi $117.25

#15. Piedmont-Airlines 1-Ticket from Lansing to D.C.

#16. Pat Eltman Reimbursement of Expenses for Committee Misc. $95.00

#17-Lenny Stern Reimbursement for Airline ticket to D.C. $10.00 Misc. $133.00

#18- Joe Sudbay--$317.48 Included $123.00 Airfare to D.C., Pay $160 Exp. $34.4

#19-Jennifer Collins Reimbursement-$291 Airfare From Lansing to DSM

Balance Forward=$685.96
Deposited $3000-on 3/19/84

NEW BALANCE AS OF 3/20/84 $365.96

Exiting Destination

Eltman	D.C. Peidmont
Stern	D.C. Peidmont
Bruce	DSM United
Jenifer Collins	DSM United
Laura Tucker	Chicago-Greyhound
Joe Sudbay	Peidmont-D.C.
Mike Martin	Remain Lansing
Goeff Burns	Remain Lansing
Robin Wright	Chicago-Greyhound
Beth Barwick	Chicago-Greyhound
Deb Tauger	Chicago-Greyhound
Andy Meyers	Chicago-Greyhound
Coleen Neary	Chicago-Greyhound
Scott Dolley	Chicago-Greyhound

SALARY PAYMENT Based on 5 days pay----

Koppel	$160
Collins	$160
Tucker	$90.
Sudbay	$160
Burns	$145
Martin	$90.
Wright	$215.
Harwick	$90
Tauger	$90.
Meyers	~~$90.~~ 145.00
Neary	$90.
Dolley	$215.
	$2050.

Miscellaneous Expenses-

United Airlines $207. Lansing to DSM
Travel Lodge $358.95
Mary Addison $50.50 Hotel Reimbursement.

8504050459 3/

+ Koepel - ✓	$225.	45	160 pay
+ ✓ Collins - ✓	$225	45	160 pay
- Tucker -	PD. = $75. cc	(10)	90 pay
- Sudbay -	$225	45	160 pay
+ ✓ Burns * ✓	$200		145 pay
+ ✓ Martin * ✓	$75.		$90 pay
+ Wright.	$300.	45.	215 pay
+ Beth Hasuck ✓	$75 -		90 pay
+ Deb Sauger ✓	$75 -		90 pay
+ Amy Meyers ✓	$200.		$145 pay
- Deary -	$75	-	90 pay
- Dolly	$300.		$215 pay.

$2050

8504050459 1

- United Airlines) $ 207.cc 1 - DSM ✓
- Piedmont Airlines (5) - D.C - 123@ = 615.00
- Amtrak $ 34.00@
- Travel Lodge - $ - 285.20 (+42.40 - 4 ROOMS)
- Sheraton $50.50 - owe Mary addison)

1
145.00
27.25
172.25

32.
x 5
$160

29 - ROOM - 532 -
- COSGROVE -

8504050459 5

17.25
90
32 7.25

Beginning Balance $4000.00

1 - Mike Martin PD + #15 = #90

2 - Bruce Koppel - #160 pay - #41.85 exp. #201.85

3 - United Airlines - Koppel - Las to DSM - #207.00

4 - Mary Addison - #Hotel for Bruce #50.50

#5 - Jini Collins - (#175.51) #160 pay + rest exp.

#6 - Jeff Burns - #145.00 (pay - 5 days)

#7 - Indy Meyers - 5 days + Grey - #~~172.25~~ 172.25 #117.25

#8 - Bob Dauger - #117.25 - #90 PD + Greyhound.

#9 - Betty Harwick - #117.25 - #90 PD + Greyhound.

#10 - Robin Wright - #242.25 5 days + Greyhound.

#11 - Travel Lodge - #358.95 - Bill for Lodging

#12 Laura Tucker - #117.25 145 ?

13 - Scott Dolley - #242.25

14 - Colleen Geary - #117.25

#15 Piedmont #123 for Las to DC

#16 Pat Ellmers - Reimbursements #95.00

6th Dist only

Balance Fwd

4000.00
2572.56
$1427.44
$4000.00

~~owe Lenny $123.00~~
~~owe Joe Sudbay - Pay 5 days Plus - Travel~~
owe Jenni Travel -

#17 / 133.00 Lenny 123 - fare 10.00 exp

#18 - 317.48 - Jen, Pay $160 exp. 34.48
123.
Joe Sudbay.

#19. $291 - Fare to DSM. Rembursement

Balance - $685.96

3/9 - Deposit $3000 - $3685.96

3/20 $3600 to Wisconsin At-Large
Mondale - Delegate Comm.

Balance $85.96.

8504052747

Bruce Koppell - Home - Des Moines
Mike Martin Home Lansing
~~Amy~~ Andy Meyers - Chi office
Deb Tauger - Chi office
Beth Warnick - Chi office
Robin Wright - 312-724-1892.
Scott Dolley - Chi office
Jan Collins Home DSM.
Colleen Neary - 312-929-3564
Lenny S DC
Joe S
Jeff Burns - 517-483-1156.

Check # 5250
Mailed to
Capital National
Bank
3/9
1,274.96
65 5.96

8504050450 2

Steve Elmendorf - to Solidarity Hse
8000 E. Jefferson
9:15A Call Duane 926-5337
Hugh Lacayo -

($1000 6th Dist - Acct# 300-334-7
Capitol National Bank 3/16/84 2:00 P)

$2000 - 15th Dist - (Hold)

Elmendorf - 3000 6th } (Hdd)
3000 15th }

Expenses + Lunches + Salary -
5 days
Jeri - $900
Koepsel - $900
Bobbie Wright
Warwick
Ingest - $900 -
~~Doug Fleming~~
Cobert Yaryan

Steve Wiser -
Tim + D.C.
Kenny + Jeanne
Pat Dr. + Joe
Laura - Home
Scott Solley -

Document 16, [redacted] 4 -- side B

48 Chicks

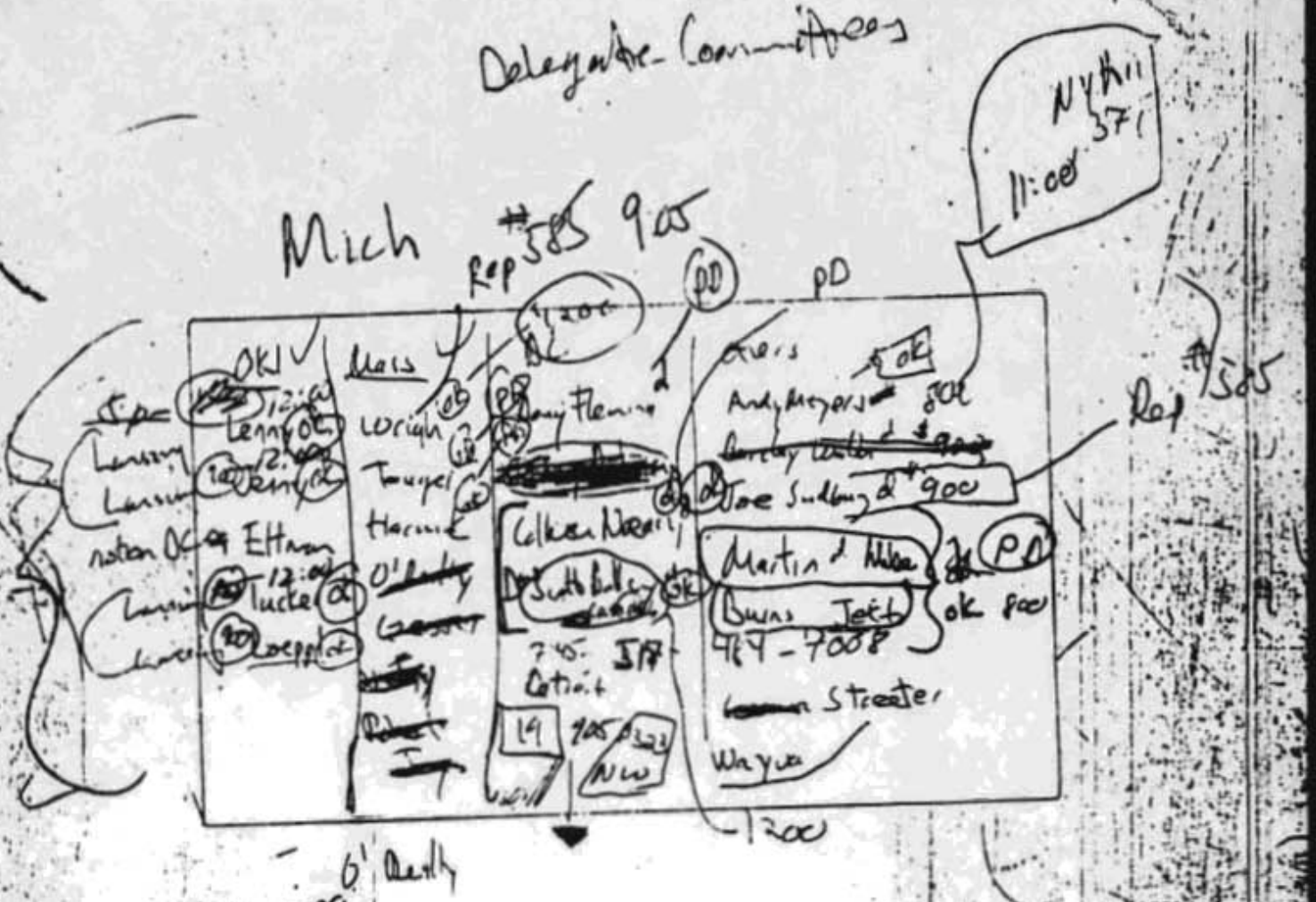
Eltman & Stern - National @ DC ok
Bruce Zoppi #900 - #225 - DSH -
Jenifer Collins #900 - #225 - DC ok
Laura Tucker PD Chic (Bus)
Joe Sudbay - #900 - ~~DC~~ DC ok
Jeff Burns #800 - ✓ ? Stay here -
Mike Martin - PD - ✓ - STAY ok
Robin Wright - #1200 Chic (Bus)
Beth Hahneck - PD Chicago - (Bus)
Deb Jaeger - PD Chicago - (Bus)
Judy Meyers #800 ~~New York~~ Chic
Colleen Neary - #15 PD -
Scott Dolley - #1200 → (-DC) ✓

(~~4 Res. tickets~~) 9:30A - Greyhound Bus.

8 people
3 double rooms
for Tennessee visit

Bill
$50.50
Sheraton

Bruce


Delegate Committees
Mich
#585 905
Rep
pD
pD
NYH11
371
11:00
OKI
Mars
Others
Andy Meyers
Martin & Mike
Burns Jeff
484-7008
Streeter
Wayne
Detroit
905
NW
6' depth
Speech Housing
$6000
Initial Checkbook
½ Lansing
½ Detroit

8504D50460

5th Dist. Delegates for Hardale Committee

5th	H. David Soet	616-451-8496	1400 McKay Tower Grand Rapids	49503
6th	Larry Owen (517-487-2070)	Miller, Canfield, Paddock - Stone Capitol Nat'l Bank	One Michigan Ave 9th Floor Lansing	48933
15th	Patricia Tollendge Clare Lawyers	313-722-1411 Wayne Bank Wayne Mich	34451 Harrison	Wayne Mich 48184
16th	Christopher Smith	313-963-2340	1632 First National Bank	Detroit, Mich. 48226
44th	Donald Tucker (Franklin Savings + Loan)	313-353-3890 P.O. Box 5023	26911 Northwestern #410	Southfield, 48086

313-626-1449 Wayne Streeter 517-484-7008

332-8863

8502-4052460 2

CC
-18

TO: Iowa and New Hampshire
FR: Matthew and Sally

RE: The Fritzkreig

So that we are all working off of the same list, here it is. Our goal--64 people (who will work in pairs) targetting 75 towns.

Staff

1	John Cacciatore	$125?	from Iowa	rated
2	Jennifer Collins	125	Iowa	
3	Bruce Koeppl	250	Iowa	
4	Lisa Ney	125	Iowa	
5	Helen Spilker	250	Wisc.	
6	Dan Wilson	250	Iowa	
7	Rick Rosenthal	300	Mass.	
8	Bennett Freeman	415	DC	
9	Debbie Katz	250	DC	
10	John Dorgan	250	DC	
11	John Glasheen	300	RI	
12	Scott Dolley	375	DC	
13	Pat Eltman	300	ME	
14	Beth Sullivan	225	DC	
15	Judith Bagley	300	DC	
16	Lenny Stern	300	DC	
17	Robin Wright	300	Mass.	
18	Joe Shea	200	Mass.	
19	Robert Seng	225	Minn.	
20	Elisabeth Evans	225	Minn.	
21	Mark Jacobsen	225	Minn.	
22	Jerry Steinworth	225	Minn.	
23	Sue Hofer	200	DC	
24	Kevin Saba	200!	Mass.	
25	Elisabeth Shapero	250	DC	
26	Jeff Burns	200	DC	
27	Joanne McGuire	685	AL	
28	Dan Paradee	225	ME	
29	Michael Copperthite	200	DC	
30	Peter Handler	200	IL	
31	Elizabeth Harty	200	Minn.	
32	Julie Gibson	200	AL	

Per Diem at $18.50/day

33	Debra Tauger		DC
34	Charles Higgens		CA
35	Nancy Combs	?	Iowa
36	Debbie Callahan		CA
37	Renee Pilette		Mich,
38	Hilberto Ocanas		TX
39	Jay Monahan		DC
40	Mike Martin		Mich

Ca'Adrian

41	Rafik Iskander	DC
42	Dave Levine	DC
43	Chris Casey ?	DC
44	Karen Skelton ?	Mass.
45	Wally Bishop (probably won't go) won't go	NJ
46	Peter Walsh	CT
47	Dwight Cramer (probably won't go) will go	DC
48	Laura Tucker	IL
49	Michael Sidley	CA
50	David Bunis	DC
51	Philip Dufor	LA
52	Laurence Reid	OH
53	Steven Polunsky (probably won't go) won't go	DC has car here
54	Paul Cooper	DC
55	Elizabeth Harwick	DC
56	Michael Burns	CA
57	Michael Vickerman	NY
58	Curtis Free	DC
59	Thomas Sheridan	DC
60	James Thompson	DC
61	Tommy Wells	DC
62	Cathy Cushman	DC
63	Angela Jones maybe won't go	~~DC~~
64	Devon Allison has car maybe won't go	CA
65	Daniel Farrell	DC
66	Ted Fiskwold	Minn

These 66 will be asked Monday nite/Tuesday morning. We expect some drop-off. Please replace so that we do in fact have 64 people coming into New Hampshire.

And please, if there are changes, do the changes thru the desks.

8504604

Florida State Off
1822-A N. University Drive
Plantation, FL 33322
[redacted]

MONDALE

Memorandum:

Date: February 15, 1984
To: Delegates and Alternates For Mondale
From: William J. Fleming

Filing Information

Each C.D. in the State of Florida should have formed a Delegate Slate Campaign Committee and filed papers with the F.E.C. in Washington with copies of the filing papers sent to the Florida Supervisor of Elections Office in Tallahassee.

There has been a question about whether individual delegates and alternates should file with the Florida Supervisor of Elections Office. The Mondale Campaign attorney's office in Washington has advised all delegates and alternates that they do not have to file as individuals with the State basing this decision on the following:

2 U.S.C. Sec. 453

The provisions of this act and of rules prescribed under this act supersede and preempt any provision of state law with respect to election to federal office.

Federal regulations state that individual delegates do not have to file, whether they are members of Delegates Slate Camapign Committees or not. It is best that delegates not accept checks written to themselves or make personal campaign expenditures but rather have all funds given directly to their Delegates Slate Campaign treasurer and expend funds through this same Campaign Committee.

Primary Ballot Information

The Primary ballot is a difficult and long ballot. Since this is the first Primary where Delegate and Alternate names appear on the ballot, the voters need to know that they must vote in three(3) different places. Your literature should explain the ballot as well as promote the candidacy of the entire slate. Any material produced by the Delegate Slate Campaign Committee must have a disclaimer printed on each piece using the name designated by the Committee on its bank account.

The Campaign office should be contacted if any further information is needed regarding the above.

Paid for by Mondale for President Inc

8504050460

ORGANIZATION OF DEL[illegible]ATES SLATE CAMPAIGN COMMI[illegible]EES

C.D. Delegate Slate Meeting to form campaign committee:

1. Select a chairperson (other than the Steering Committee Chairperson)
2. Select a campaign treasurer TO WORK WITH Bill Fleming
3. Each delegate should develop a nuts and bolts person to assist him/he
4. The campaign committee can have a nuts and bolts person and REIMBURSE same from funds raised by campaign . We must remember that this is a volunteer effort. The campaign Committee may not purchase advertising or send direct mail. It can put pictures and stories in magazines or articles submitted to press. One slate campaign is taking a group picture and submitting it to available publications.
5. Evolve a fundraising strategy.
   a- a fundraising committee as an arm of the slate camapign.
   b- search for $ people from other camapign organizations
   c- devise time table of $ events and contact mechanisms
6. Select a Press spokesperson (Not his opinion but his job to diseminate delegate campaign information to the press with the counsel of Bill Fleming, State Director for Mondale Camapign.)
7. Develop a calendar for surrogate(delegate) appearances. (Each delegate is a surrogate, not for himself but for the entire slate of delegates in the C.D.INCLUDING ALTERNATES!) Speakers should use appropriate materials generated by the Mondal Campaign in order to be consistent. However, they may speak about Mondale so long as their intent is clear, that is to elect the entire slate of delegates and alternates on March 13.
8. Develop a precinct organizational strategy. Targeting precincts:
9. Select a person to oversee phone banks (home banks) (group phones)
10. Determine convenient meeting dates across C.D.
11. Organize Blitz Activities
12. Develop strategy to use Steering Committee as the Volunteer Organization of the campaign.

8504030460 5

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.



8504050046007

LET'S ELECT 15th CD

WALTER MONDALE

5 — DELEGATES and 2 — ALTERNATES

March 13th — Primary

Vote For *MONDALE* In Three Places On The Ballot

1. At The Top Of The Ballot ...
(page 1)

11 MONDALE

2. Delegates Committed To *MONDALE* .....
(page 3A)

Barbara L. Hamilton	(Mondale)	47
Charles "Chic" R. Perez	(Mondale)	48
George Platt	(Mondale)	49
Harry Rosenkrantz	(Mondale)	50
Kathleen Cooper Wright	(Mondale)	51

3. Alternates Committed To *MONDALE* ....
(page 5A)

Robert E.Lockwood	(Mondale)	86
Karen Parks	(Mondale)	87

Paid for by Hanover Sub District Delegate Committee

8504050460 3



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.



Document 22, no. 1 -- side A p. 1

C 0 9 4 0 5 0 4 0 5 8



Support the Delegates Who Support Mondale

The 20th District Mondale Slate

PENNY L. SEVERNS, Administrative Assistant to State Comptroller Roland Burris; member of Decatur City Council; resides in Decatur.

GARY TUMULTY, Sangamon County Clerk/Assessor and Town Clerk of Capitol Township.

ROBERT L. WATSON, Attorney; Chairman of Board of Trustees of Lewis and Clark College; Precinct Committeeman.

JUDITH BARRINGER, Legislative Coordinator of the Illinois Commission on the Status of Women; NOW member; Past president of NOW Springfield Chapter; Past Legislative Chairwoman of Illinois Women's Political Caucus.

LARRY D. MOLLETT, Executive Secretary of East Central Illinois District Council of Carpenters; Chairman of 20th Congressional District COPE; resides in Mt. Zion.

SHARON MCCOLLUM, School Teacher; Vice Chairwoman of IEA-NEA for Region 7; Community Activist; resides in Taylorville.

Alternates

JOHN F. REAGAN, Financial Secretary/Treasurer of United Auto Workers 1027; Precinct Committeeman; resides in Springfield.

PAULINE B. TAMMEN, Community Leader; Retired Pike County School Teacher; resides in Hull.

5040504610

On March 20th Vote for WALTER MONDALE FOR PRESIDENT

AND THE MONDALE DELEGATES

VOTE FOR SIX

- ☒ PENNY L. SEVERNS (MONDALE)
- ☒ GARY TUMULTY (MONDALE)
- ☒ ROBERT L. WATSON (MONDALE)
- ☒ JUDITH BARRINGER (MONDALE)
- ☒ LARRY D. MOLLETT (MONDALE)
- ☒ SHARON McCOLLUM (MONDALE)

MONDALE ALTERNATES

VOTE FOR TWO

- ☒ JOHN F. REAGAN (MONDALE)
- ☒ PAULINE B. TAMMEN (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 20th Congressional District Delegates for Mondale

WALTER MONDALE



Document no. 1, p.1 -- side B

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.





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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.



Document 22, no. 1 -- side A, p. 1

8 5 0 4 0 5 0 4 6 9 1 1



Support the Delegates Who Support Mondale

The 20th District Mondale Slate

PENNY L. SEVERNS, Administrative Assistant to State Comptroller Roland Burris; member of Decatur City Council; resides in Decatur.

GARY TUMULTY, Sangamon County Clerk/Assessor and Town Clerk of Capitol Township.

ROBERT L. WATSON, Attorney; Chairman of Board of Trustees of Lewis and Clark College; Precinct Committeeman.

JUDITH BARRINGER, Legislative Coordinator of the Illinois Commission on the Status of Women; NOW member; Past president of NOW Springfield Chapter; Past Legislative Chairwoman of Illinois Women's Political Caucus.

LARRY D. MOLLETT, Executive Secretary of East Central Illinois District Council of Carpenters; Chairman of 20th Congressional District COPE; resides in Mt. Zion.

SHARON MCCOLLUM, School Teacher; Vice Chairwoman of IEA-NEA for Region 7; Community Activist; resides in Taylorville.

Alternates

JOHN F. REAGAN, Financial Secretary/Treasurer of United Auto Workers 1027; Precinct Committeeman; resides in Springfield.

PAULINE B. TAMMEN, Community Leader; Retired Pike County School Teacher; resides in Hull.

5 0 4 0 5 0 4 6 1 2

On March 20th Vote for WALTER MONDALE FOR PRESIDENT

AND THE MONDALE DELEGATES

VOTE FOR SIX

- ☒ PENNY L. SEVERNS (MONDALE)
- ☒ GARY TUMULTY (MONDALE)
- ☒ ROBERT L. WATSON (MONDALE)
- ☒ JUDITH BARRINGER (MONDALE)
- ☒ LARRY D. MOLLETT (MONDALE)
- ☒ SHARON McCOLLUM (MONDALE)

MONDALE ALTERNATES

VOTE FOR TWO

- ☒ JOHN F. REAGAN (MONDALE)
- ☒ PAULINE B. TAMMEN (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 20th Congressional District Delegates for Mondale

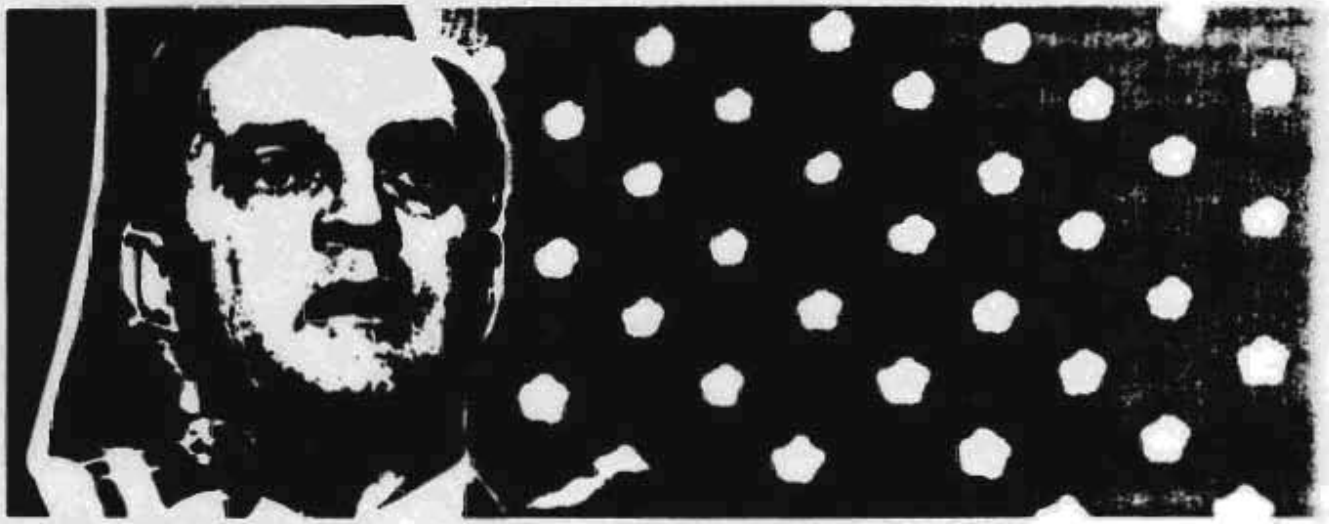
WALTER MONDALE

Document no. 2, p.1 -- side B



THE EXPERIENCE TO KNOW WHAT WE NEED TO CHANGE... THE STRENGTH TO MAKE IT HAPPEN

"America must be number one again 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.



Document 22, no. 3, p. 1 - side A

8 5 0 4 0 5 0 4 6 1 3

FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

TO: Docket DATE:

FROM: Lois

☐ APPROVAL	☐ IMMEDIATE ACTION	☐ RECOMMENDATION
☐ AS REQUESTED	☐ INITIALS	☐ SEE ME
☐ CONCURRENCE	☐ NECESSARY ACTION	☐ SIGNATURE
☐ CORRECTION	☐ NOTE AND RETURN	☐ YOUR COMMENT
☐ FILING	☐ PER OUR CONVERSATION	☐ YOUR INFORMATION
☐ FULL REPORT	☐ PER TELEPHONE CONVERSATION	☐
☒ HANDLE DIRECT		
☐ ANSWER OR ACKNOWLEDGE ON OR BEFORE _____		
☐ PREPARE REPLY FOR THE SIGNATURE OF _____		

REMARKS:

Please attach tapes before sending this on

8 3 0 4 0 5 0 4 9

☆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: June 6, 1984

SUBJECT: MUR 1667 - Memorandum to The Commission
(Re: Memo from RAD)

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	[X]	Other (see distribution below)	[ ]

24 HOUR TALLY VOTE

CIRCULATE ON PINK PAPER

SENSITIVE

8504050461 7

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Kate Rosenthal
The Hills Building
Suite 800
Syracuse, New York 13202

Re: MUR 1667 and 1704
27th Congressional District
Delegates for Mondale, John
McAuliffe, as treasurer

7/13

Dear Mr. Rosenthal:

On June 25, 1984 you called this office to ask for an extension of time to respond to the complaint in MUR 1704. During that conversation, it became apparent that, because of a problem with the postal service, your clients had never received a copy of the complaint filed in MUR 1667. A copy of that complaint was mailed to you on June 26.

By letter dated June 25, 1984 you formally requested an extension of time to allow you to respond to both complaints 15 days after your receipt of the complaint in MUR 1667. On July , 1984, the Commission considered your request and voted to grant the extension. Accordingly, your response to MURs 1667 and 1704 are due 15 days from the date of your receipt of the complaint in MUR 1667.

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at 523-4143.

Sincerely,

Charles N. Steele
General Counsel

8504050469

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary

FROM: Office of General Counsel

DATE: July 2, 1984

SUBJECT: MUR 1667/1704 - Memorandum to The Commission
(Req for exten - 27th Cong Dist Dele.)

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	[x]	Other (see distribution below)	[ ]

24 HOUR TALLY VOTE

SENSITIVE

CIRCULATE ON PINK PAPER

8504053046220

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Kate Rosenthal
The Hills Building
Suite 800
Syracuse, New York 13202

Re: MUR 1667 and 1704
27th Congressional District
Delegates for Mondale, John
McAuliffe, as treasurer

7/13

Dear Mr. Rosenthal:

On June 25, 1984 you called this office to ask for an extension of time to respond to the complaint in MUR 1704. During that conversation, it became apparent that, because of a problem with the postal service, your clients had never received a copy of the complaint filed in MUR 1667. A copy of that complaint was mailed to you on June 26.

By letter dated June 25, 1984 you formally requested an extension of time to allow you to respond to both complaints 15 days after your receipt of the complaint in MUR 1667. On July , 1984, the Commission considered your request and voted to grant the extension. Accordingly, your response to MURs 1667 and 1704 are due 15 days from the date of your receipt of the complaint in MUR 1667.

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at 523-4143.

Sincerely,

Charles N. Steele
General Counsel

8504050462 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary

FROM: Office of General Counsel

DATE: July 2, 1984

SUBJECT: MUR 1667/1704 - Memorandum to The Commission
(Req for exten - 27th Cong Dist Dele.)

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	[x]	Other (see distributi below)	

24 HOUR TALLY VOTE

SENSITIVE

CIRCULATE ON PINK PAPER

8504046222

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 3, 1984

Kate Rosenthal
The Hills Building
Suite 800
Syracuse, New York 13202

Re: MUR 1667 and 1704
27th Congressional District
Delegates for Mondale, John
McAuliffe, as treasurer

Dear Mr. Rosenthal:

On June 25, 1984 you called this office to ask for an extension of time to respond to the complaint in MUR 1704. During that conversation, it became apparent that, because of a problem with the postal service, your clients had never received a copy of the complaint filed in MUR 1667. A copy of that complaint was mailed to you on June 26.

By letter dated June 25, 1984 you formally requested an extension of time to allow you to respond to both complaints 15 days after your receipt of the complaint in MUR 1667. On July 3rd, 1984, the Commission considered your request and voted to grant the extension. Accordingly, your response to MURs 1667 and 1704 are due 15 days from the date of your receipt of the complaint in MUR 1667.

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at 523-4143.

Sincerely,

Charles N. Steele

Charles N. Steele
General Counsel

8504050462 3

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
27th Congressional District Delegates for Mondale; John McAuliffe, as treasurer	)	MURs 1667 and 1704

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on July 3, 1984, the Commission decided by a vote of 5-0 to take the following actions in the above-captioned matter:

1. Grant the extension of time to respond to the complaint in MUR 1704 requested by the 27th Congressional District for Mondale Committee and John McAuliffe, as treasurer of the committee.

2. Send the letter attached to the General Counsel's report dated July 2, 1984.

Commissioners Aikens, Elliott, McDonald, McGarry, and Reiche voted affirmatively for the decision; Commissioner Harris did not cast a vote.

Attest:

7-3-84
Date

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

Received by the Commission Secretary on July 2, 1984 at 11:57 a.m.
Circulated to the Commissioners on July 2, 1984 at 4:00 p.m.
Vote deadline: July 3, 1984 at 4:00 p.m.

8504050462 1

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

84 JUL 2 All: 58

July 2, 1984

SENSITIVE

MEMORANDUM TO: The Commission

FROM: Charles N. Steele
General Counsel

SUBJECT: Request for Extension of Time in MURs 1667 and 1704 - 27th Congressional District Delegates for Mondale, John McAuliffe, as treasurer

The Office of the General Counsel has received an additional request for an extension of time from above-named respondents in MURs 1667 and 1704. This office has reviewed the request and, in light of the circumstances, believes it should be granted.

Counsel representing the respondents telephoned this office on June 25, 1984 to request an extension of time to respond to the complaint in MUR 1704. During that conversation, it became apparent that the respondents had not received notification of the complaint in MUR 1704 until June 18, 1984 and had never received notification of the complaint in MUR 1667. Our records indicate that the Post Office was unable to deliver the complaint in MUR 1667 to the address verified as being that of the respondents. On June 26, 1984, a copy of the complaint in MUR 1667 was mailed to respondents.

By letter dated June 25, 1984, counsel requested that she be permitted to file responses to the complaints in both MURs 1667 and 1704 fifteen days after receipt of the complaint in MUR 1667.

Respondents will automatically be afforded fifteen days from the receipt of the complaint in MUR 1667 to respond in that matter, therefore, counsel's request for an extension relates only to the complaint in MUR 1704. This office recommends that the Commission grant the requested extension, as it will not unduly delay the matter and will allow counsel to provide a full response to both complaints.

8504050462 5

Recommendation

Grant the extension of time to respond to the complaint in MUR 1704 requested by the 27th Congressional District for Mondale Committee and John McAuliffe, as treasurer and send attached letter.

Attachments
1. Request letter
2. Letter to respondents

8504050462

KATE ROSENTHAL
ATTORNEY AND COUNSELOR AT LAW
SUITE 600
THE HILLS BUILDING
SYRACUSE, NEW YORK 13202
315-471-0126

FEC
84 JUN 26 P12:27

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

Attachment 1

8504627

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Kate Rosenthal
The Hills Building
Suite 800
Syracuse, New York 13202

Re: MUR 1667 and 1702
27th Congressional District
Delegates for Mondale, John
McAuliffe, as treasurer

Dear Mr. Rosenthal:

On June 25, 1984 you called this office to ask for an extension of time to respond to the complaint in MUR 1704. During that conversation, it became apparent that, because of a problem with the postal service, your clients had never received a copy of the complaint filed in MUR 1667. A copy of that complaint was mailed to you on June 26.

By letter dated June 25, 1984 you formally requested an extension of time to allow you to respond to both complaints 15 days after your receipt of the complaint in MUR 1667. On July , 1984, the Commission considered your request and voted to grant the extension. Accordingly, your response to MURs 1667 and 1704 are due 15 days from the date of your receipt of the complaint in MUR 1667.

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Attachment 2

5 0 4 0 5 0 4 6 2 3

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

MONDALE

GCC #4001

JUL 10 5:00

July 10, 1984

Tapes in docket

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

RE: MUR 1667

Dear Mr. Steele:

Enclosed are the in-house computer tapes requested by the Commission in document requests #17 and #18 of the FEC subpoena of May 23, 1984.

Sincerely,

Carolyn U. Oliphant

Carolyn U. Oliphant
Deputy General Counsel

8504005046 2 7

Paid for by Mondale for P

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

MONDALE

TAPES ARE IN DOCKET

July 6, 1984

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

Re: MUR 1667

Dear Mr. Steele,

Enclosed is the machine-readable material from our contractor, CDSI, requested by the Commission in document requests #17 and #18 of the FEC subpoena of May 23, 1984. The in-house computer tapes will be available next week. The Commission has requested that we provide these materials even though they contain information already within the FEC's possession. MPC has further advised the Commission that these materials are probably unusable by the Commission for the purposes sought. Nonetheless, upon request, MPC is providing them in order to cooperate fully with the Commission's investigation. Please advise us whether these materials are, in fact, usable by the Commission.

Sincerely,

Carolyn U. Oliphant
Deputy General Counsel

CUO/bjp

Paid for by Mondale for President, Inc.

8504063046

MEMORANDUM

TO: Christine Brewer, Mondale Presidential Committee

FROM: L. Leos, CDSI

DATE: July 5, 1984

SUBJECT: MPC Financial and Master file tapes

Enclosed are two tapes containing MPC's master files and detailed transactions from 100183 to 153184. Tape number 004848 contains the financial transactions. Its attributes are 1, SL 128/4224(LRECL/BLKSIZE). Tape number 006806 contains the master files. Its attributes are 1, SL 80/2000 (LRECL/BLKSIZE). To assist the FEC in reading these tapes, record layouts of each tape are attached.

8504050463 1

Record Layout for Financial Transaction (Tape # 004845)

Record Position	Description
1-4	Record type and user I.D. (always TMPC)
5-6	Transaction code (TC) 60/69 - New/hold voucher 63 - Automated Cash Disbursement 64 - Manual Check 66 - Void Check 68 - Accomplished Draft
7-12	Transaction Date
13-18	TC60, 69 - voucher number TC63, 64, 66 - Check number TC68 - Bank statement date
19-33	Description
34-39	Vendor number
40-45	TC60, 69 - All zeroes TC63, 64, 66 - voucher number TC68 - Draft number
46-59	Account Number Pos. 46 - Fund type (always 0) Pos. 47 - Class Code (2 - expense) (3 - asset) Pos. 48-49 - For Class 2 - Cost center For Class 3 - 12 - operating cash account 13 - draft cash account Pos. 50 - BP function 1 - Operating Expenditures 2 - Exempt Fund raising 5 - Exempt Legal and accounting
51-52	Object code
53-54	Subobject code
55-59	Project Number (always 00000)
70-80	Transaction Amount

8504046732

Record Layout for Master Files (Type # 006808)

Record Position	Description
1	Master File I.D. C - Client file (contains object codes) H - Header file (contains account numbers) V - Vendor (contains vendor numbers) O - Subobject (contains subobjects for each object)
2-4	User I.D. (always MPC)
5-6	File Maintenance Transaction code 01 - add record 02 - delete record 03 - modify record
7-12	File Maintenance Transaction date
13-15	Sequence number (significance varies by master file)
16-80	Significance varies by sequence number and master file (See attached record layouts)

8504050463 3

OF 'C' MASTERFILE

SEQ #'S. 064-097, CONTAIN OBJECT CODES FOR ALL CLASSES OF TRANSACTIONS

COMPUTER DATA SYSTEMS, INC.
FINANCIAL SYSTEMS DIVISION
USER PROFILE FORM
EXPENSE (COST) CODES



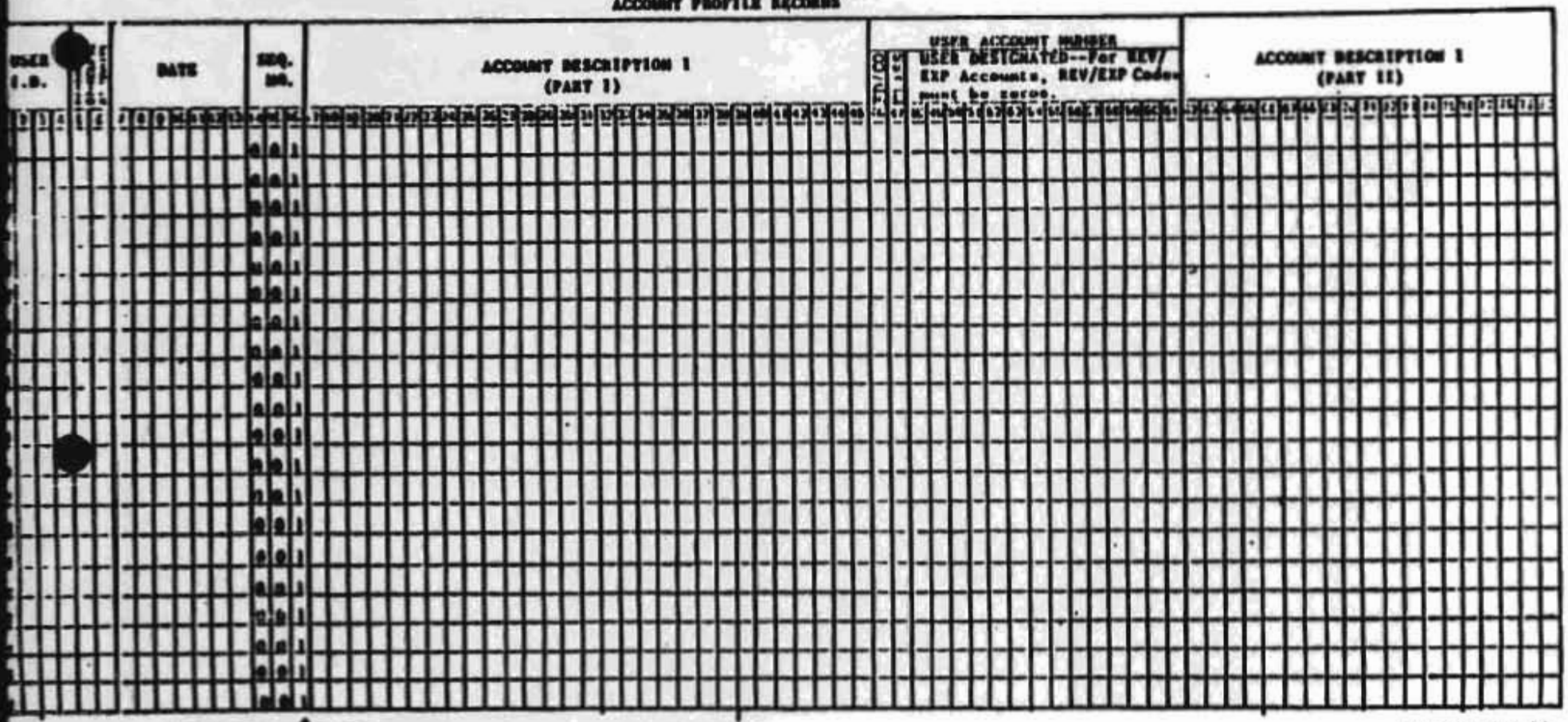
Object Code	DESCRIPTION	Object Code	DESCRIPTION	Object Code	DESCRIPTION
00	01-30	01	31-59	02	60-90

8504053041

'H' - MASTERFILE (HEADER/ACCOUNT PROFILE)

Computer Data Systems, Inc.
Financial Systems Division
7315 Wisconsin Avenue • Washington, D.C. 20014 • (301) 657-1720

ACCOUNT PROFILE RECORDS



FAAM-001 2-1-78

SEQUENCE NO. 1 —
General Ledger
Account Titles

SEQUENCE NO 2
TRIAL BALANCE ACCOUNT TITLES

8 5 0 4 0 5 0 4 6 3 1

1 V7- VENDOR FILE

CDSI
ACCOUNTS PAYABLE
VENDOR PROFILE RECORDS
4/1/81

USER ID	TC	DATE M M D D Y Y	SEQ. NO.	VENDOR NUMBER	VENDOR PROFILE DATA FIELDS

V	0	0 0 1	VENDOR NAME				VENDOR CLASS CODE	TAX ID		
V	0	0 0 2	ADDRESS LINE NUMBER				ONE TIME VENDOR Y/N 1099 CODE Y/N			
V	0	0 0 3	CITY NAME	ST	ZIP	AREA	EXCH	NUMBER	ATTENTION TO	
V	0	0 0 1	VENDOR NAME				VENDOR CLASS CODE	TAX ID		
V	0	0 0 2	ADDRESS LINE NUMBER				ONE TIME VENDOR Y/N 1099 CODE Y/N			
V	0	0 0 3	CITY NAME	ST	ZIP	AREA	EXCH	NUMBER	ATTENTION TO	

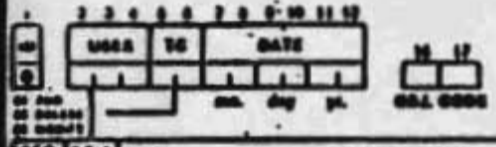
AP-3

8 Σ 0 4 0 5 0 4 6 3 5

'0' - MASTERFILE (SUBOBJECT)

FARC 630 11-1-79

COMPUTER DATA SYSTEMS, INC.
FINANCIAL SYSTEMS DIVISION
SUB-OBJECT CODE DESCRIPTIONS



2 Digit Code	DESCRIPTION	2 Digit Code	DESCRIPTION	2 Digit Code	DESCRIPTION
	10-35		50-59		60-80

1 OR SEQ #: 2XX - REPRESENTS EXPENSE SUBOBJECT CODES
3XX - REPRESENTS ASSET & LIABILITY SUBOBJECT CODES



Support the Delegates Who Support Mondale

The 15th District Mondale Slate

TIM LEE HALL, [illegible] elected Dwight School the 15th District [illegible] to the 98th Congress

BARBARA J. SIKES, [illegible] where she has been a school [illegible] almost 20 years

THOMAS D. WHALEN, [illegible] and is active in the [illegible] International Union. He is chairman the Executive Board of the [illegible] County Democratic [illegible]

LUELLEN W. LAURENTI, [illegible] at Illinois State University in [illegible] where she has [illegible] County Democratic Chairwoman, Board Member [illegible] National Organization for Women (NOW).

Alternate

CARYL E. WADLEY-FOY, [illegible] and employed at Shapiro [illegible] where she is [illegible] Local 268 of the American [illegible] County Municipal Employees (AFSCME).

On March 20th Vote for WALTER MONDALE FOR PRESIDENT

AND THE MONDALE DELEGATES

VOTE FOR 4

- ☒ TIM LEE HALL (MONDALE)
- ☒ BARBARA J. SIKES (MONDALE)
- ☒ THOMAS D. WHALEN (MONDALE)
- ☒ LUELLEN W. LAURENTI (MONDALE)

MONDALE ALTERNATE

VOTE FOR 1

- ☒ CARYL E. WADLEY-FOY (MONDALE)

MONDALE

ILLINOIS FOR MONDALE

Chicago
[illegible] W Washington, #500
Chicago, IL 60602
(312) 368-9864

Springfield
600 N. First Street
Springfield, IL 62702
(217) 522-9850

Paid for by the 15th District Mondale Delegate Committee

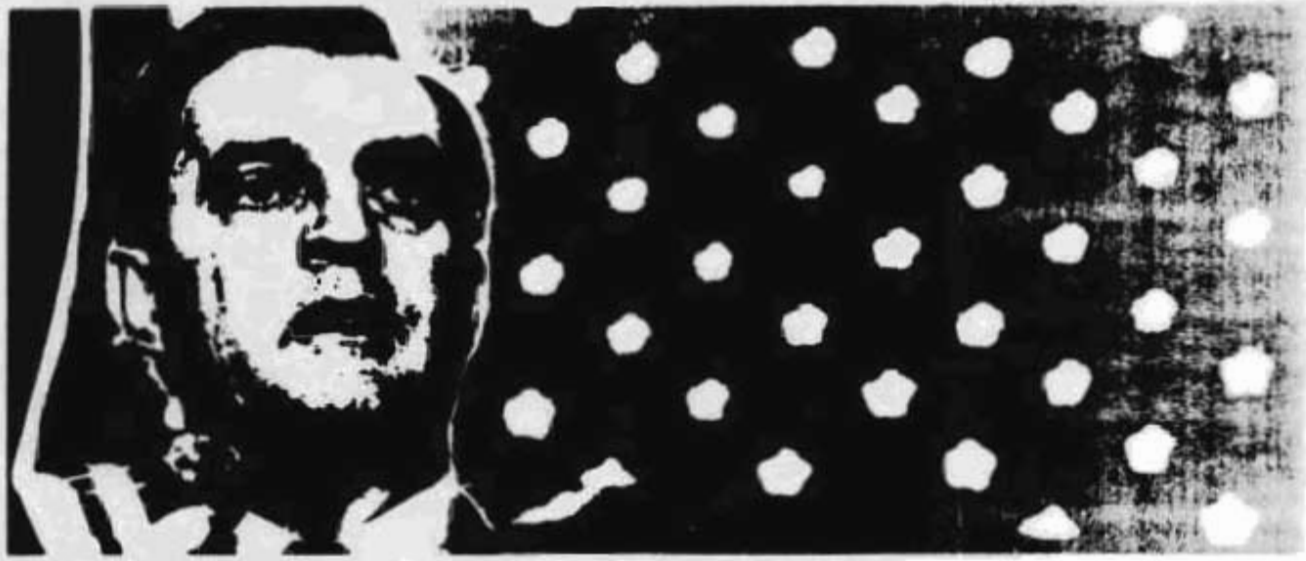
WALTER MONDALE

Document 22, [illegible] 3, p. 1 -- side B



THE EXPERIENCE TO KNOW WHAT WE NEED TO CHANGE... THE STRENGTH TO MAKE IT HAPPEN

"America must be number one again 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 ensure 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.



Document 22, no. 1 -- p. 1 -- side A

0 5 0 4 0 5 8



Support the Delegates Who Support Mondale

The 19th District Mondale Slate

LARRY R. STUFFLE,

SHIRLEY STILLINGER,

SCOTT SHEARER, and Legislative Aide to United

LE ANN CONNELLY,

SHARON WALKER, and President

Alternates

"ANDY" TURNER, and Alumni

DIANE K. PARHAM,

5 0 4 0 5 0 4 6 4 0

On March 20th Vote for WALTER MONDALE FOR PRESIDENT

AND THE MONDALE DELEGATES

VOTE FOR 5

- ☒ LARRY R. STUFFLE (MONDALE)
- ☒ SHIRLEY STILLINGER (MONDALE)
- ☒ SCOTT SHEARER (MONDALE)
- ☒ LE ANN CONNELLY (MONDALE)
- ☒ SHARON WALKER (MONDALE)

MONDALE ALTERNATES

VOTE FOR 2

- ☒ WAYNE ANDERSON "ANDY" TURNER (MONDALE)
- ☒ DIANE K. PARHAM (MONDALE)



ILLINOIS FOR MONDALE

Chicago
[illegible]
Chicago, IL 60602
(312) 368-1984

Springfield
601 N. First Street
Springfield, IL 62702
(217) 522-9850

Paid for by the 19th District Mondale Delegate Committee

WALTER MONDALE



Document 23 no. 4, p. 1 -- side B

THE EXPERIENCE TO KNOW WHAT WE NEED TO CHANGE... THE STRENGTH TO MAKE IT HAPPEN

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Pahl, Louis C.
2134 Fairhaven Drive
St. Louis, MO 63136
A

Stodghill, William
Pres., Service Employees'
Int'l Union
4108 Lindell Blvd.
St. Louis, MO 63108
D/A

Tyus, Leroy
5225 Lexington
St. Louis, MO 63115
D/A

Mondale

Clancy, Jack
14205 Mondoubleau
Florissant, MO 63034
838-3457
D

Cook, Virginia
1226 Baron
St. Louis, MO 63138
741-3867
D

Lawler, John L.
3141 Wintergreen
Florissant, MO 63033
D

Reed, Gwen
11423 Tobaggon
Florissant, MO 63033
741-8038
D

Allison, Beth
503 Kimberly
St. Peters, MO 63376
D

Knott, John
11628 Mimeaux
St. Louis, MO 63138
D

2ND CONGRESSIONAL DISTRICT

Gladson, Patricia
823 Indian Hills Dr.
St. Charles, Mo. 63301
D

Graham, Betty Jean
1720 Layven
Florissant, Mo. 63031
D

Grumbe, Ralph
2218 Burns
Overland, Mo. 63114
A

Guise, Mary
8738 Antler
St. Louis, Mo. 63117
D

Hampson, Earl
10606 St. Henry
St. Ann, Mo. 63074
D

Human, Leonard
1146 Catina Dr.
St. Louis, Mo. 63141
D/A

Hunt, Joseph J.
12507 Maret Dr.
St. Louis, Mo. 63127
A

Ille, Gerald
43 Greendale
St. Charles, Mo. 63301
A

Jacobs, Jack
335 Norwich Ct.
Ballwin, Mo. 63011
D/A

Kelly, Barbara
947 Quince
St. Charles, Mo. 63301
D

Kelly, Robert
947 Quince
St. Charles, Mo. 63301
D

Lanek, Rita C.
417 Iron Lantern
Ballwin, Mo. 63011
A

Lerman, K. Louise
880 Berry Hill Dr.
Olivette, Mo. 63132
D/A

Link, Donald
#2 Kabul Ct.
St. Charles, Mo. 63301
A

Martorelli, Jack
11939 Franclar Dr.
Bridgeton, Mo. 63044
D

Martorelli, Jack
Pres.-Business Mngr.
Local 513
Int'l Union of Oper.
Engineers, AFL-CIO
2433 S. Hanley Rd.
St. Louis, Mo. 63144
D/A

McBride, Joan
2070 Huntington Dr.
Florissant, Mo. 63033
D/A

McDermott, James L.
10840 S. Henry Ct.
St. Ann, Mo. 63074
A

McDermott, Rose
22 Clermont Ln.
St. Louis, Mo. 63124
D

Menge, Bernard J.
1375 Navajo Ln.
Florissant, Mo. 63033
A

Mora, José
10534 Natural Bridge Rd.
St. Louis, Mo. 63134
D

O'Connor, Rep. Judith
4252 Brampton
Bridgeton, Mo. 63042
D

Pryor, Roger
46 Huck Finn
St. Charles, Mo. 63301
D

Pryor, Sharon
46 Huck Finn
St. Charles, Mo. 63301
D

Regat, Donald D.
2345 North 5th
St. Charles, Mo. 63301
D

Regat, Hazel
2345 North 5th
St. Charles, Mo. 63301
D

Reynolds, David L.
1325 Verline Dr.
Florissant, Mo. 63031
D

Robins, Ed
3736 Three Oaks Dr.
Bridgeton, Mo. 63044
D/A

Salamon, Rick
11 Le Jer
St. Peters, Mo. 63376
A

2ND CONGRESSIONAL DISTRICT

Ambrose, Edna L.
7103 Wilderness Ln
Barnhart, Mo. 63012
D/A

Anderson, Jeanne
4553 St. James
Bridgeton, Mo. 63044
D/A

Babbitt, Cardine
12 Fordyce Manor
Town & Country, Mo. 63131
A

Bagwell, Betty J.
2154 Foggy Bottom Dr.
Florissant, Mo. 63131
D/A

Bagwell, James M.
2154 Foggy Bottom Dr.
Florissant, Mo. 63031
D/A

Barnholtz, Edeltraut
9814 Baltimore
Overland, Mo. 63116
A

Bartley, June C.
451 Foxbrook Dr.
St. Louis, Mo. 63141
D

Beem, Charlotte
318 Houston
St. Charles, Mo. 63301
A

Beni, Pat (Mrs.)
1990 Tritter Way
Florissant, Mo. 63033
A

Borgschulte, Janice
44 Judy Dr.
St. Charles, Mo. 63301
D

Borgschulte, Kip
44 Judy
St. Charles, Mo. 63301
D

Boxerman, Dr. Burton A.
9622 Old Bonhomme Rd.
St. Louis, Mo. 63132
D

Brice, Joseph A.
1475 Duchesne
Florissant, Mo. 63031
A

Butler, Wm. L.
Rt. 1
#9 Dogwood
Eureka, Mo. 63025
D

Cannon, Michael S.
334 Chalmette Dr..
Hazelwood, Mo. 63042
D/A

Carroll, Robert H.
1660 Deborah Dr.
Florissant, Mo. 63031
D

Conley, Sr., James E.
2825 Devonshire Dr.
Florisant, Mo. 63033
A

Curtis, Kennard L.
157 Quinwood
Valley Park, Mo. 63088
D/A

Debrecht, Loretta
406 Cadillac
St. Charles, Mo. 63301
A

Donaldson, Doris
2340 Grants Parkway
Florissant, Mo. 63031
D/A

Dougherty, Josephine M.
#5 Westbrood Forest
St. Louis, Mo. 63122
D/A

Fagan, Margaret
1908 McNair Place
St. Charles, Mo. 63301
D

Fagan, Thomas W.
1908 McNair Place
St. Charles, Mo. 63301
D

Flynn, Mary Joyce
1394 Virginia
Ellisville, Mo. 63011
D/A

Foley, Bernice E.
3475 Stonehaven
Florissant, Mo. 63033
D/A

Foley, Harold A. "Bud"
3475 Stonehaven Dr.
Florissant, Mo. 63033
D/A

Foster, Charles H.
14193 Crosstrails Dr.
St. Louis, Mo. 63017
A

Freeman, Mr. Jude
34 Ayrshire Dr.
St. Charles, Mo. 63301
D/A

Freeman, Terry
34 Ayrshire Dr.
St. Charles, Mo. 63301
D/A

Gambino, Carole A
2006 Retford Dr.
Florissant, Mo. 63033
D

2ND CONGRESSIONAL DISTRICT

Foley, Thomas C.
3274 Adie Road
St. Ann, MO 63074
D

Lewis, Lona
Missouri NEA
612 Eastland Drive
Jefferson City, MO 65101
D/A

Wright, Wayne B.
Attorney at Law
8000 Maryland Ave., 9th Fl.
St. Louis, MO 63105
D/A

Karlovetz, Martha
433 Briarwyck
Ballwin, MO 63011
314/821-6719
D/A

Reel, Elizabeth L.
605 Burwick Terrace
Manchester; MO 63011
D/A

Jenkins, Steve
1020 Robinwood Dr.
Florissant, MO 63033
D/A

Mohr, Barbara
4253 Brampton
Bridgeton; MO 63044
D 314/739-7435

Schwent, Alene M.
11324 Cypress Gardens Cts.
St. Ann, Mo. 63074
D/A

Smith, Joseph F.
9421 Stansberry Ave.
Woodson Terrace, Mo. 63134
D/A

Tomas, Lawrence L.
2031 Silent Springs Dr.
Maryland Hts., Mo. 63043
D

Truitt, Janetha M.
13201 Clayton Rd.
St. Louis, Mo. 63131
A

Valenti, Jack
280 Penningbone Ln.
Chesterfield, Mo. 63017
A

Vasquez, Robert W.
707 Carriage Ln.
Hazelwood, Mo. 63042
D/A

Vietor, Earl
11009 St. Jerome
St. Ann, Mo. 63074
A

Wilson, Keith
555 N. Clay
Kirkwood, Mo. 63122
A

Wilson Margaret (Peggy)
169 Foxtree
Hazelwood, Mo. 63042
D

3RD CONGRESSIONAL DISTRICT

DeMoor, Joseph A.
3653 Upton
St. Louis, Mo. 63116
A (L)

Krieger, Ralph
4829 Blackhawk Dr.
St. Louis, Mo. 63123
A (L)

Jarvis Patricia S.
4428 Hoffmeister
St. Louis, Mo. 63125
A (L)

Campey, Wm. B.
11015 Ridge Forest Dr.
St. Louis, Mo. 63126
A (L)

Pashia, Frances M.
734 Lake Dr.
Herculaneum, Mo. 63048
A (L)

Willey, Thomas R.
1279 Walnut Trail Ct.
Fenton, Mo. 63026
D (L)

King, Richard E.
2921 Royal Gorge Ct.
St. Louis, Mo. 63129
D/A (L)

Morris, Evelyn
1791 Jean Dr.
Arnold, Mo. 63010
A (L)

Jarvis, Everett
1873 Clemens St.
Barnhart, Mo. 63012
A (L)

Velasco, Bart
2109 Devonshire
Imperial, Mo. 63052
A/D (L)

Nava, John C.
108 Cherry Hill Dr.
Fenton, Mo. 63026
D (L)

Nava, Alice
108 Cherry Hill
Fenton, Mo. 63026
A (L)

Burger, Walter
1151 Brickyard Road
Hillsboro, Mo. 63050
D (L)

Herbst, Ann C.
7638 Genesta
Affton, Mo. 63123
D/A

Carpenter, Sharon Quigley
Recorder of Deeds
St. Louis, Mo. 63103
D

Hartwig, Donna
Rt. 2, Box 203AA
Dittmer, Mo. 63023
D/A

Ambrose, Edna L.
7103 Wilderness St.
Barnhart, Mo. 63012
D (L)

Thomure, Claudette
2032 Donnell
Barnhart, Mo. 63012
D (L)

Jarvis, Glenda
1873 Clemmens Ct.
Barnhart, Mo. 63012
D (L)

Lundak, John
7002 Wayles Dr.
Barnhart, Mo. 63012
A (L)

Stanley, Wayne R.
Rt. 2, Box 308
Festus, Mo. 63028
D/A

Deckman, Michael
648 Madison Dr.
Arnold, Mo. 63010
A (L)

Deckman, Joyce M.
648 Madison Ave.
Arnold, Mo. 63010
D (L)

Overstreet, William
217 Pine St.
Crystal City, Mo. 63019
A (L)

Krshul, Karen
9005 Krshul Rd.
Cedal Hill, Mo. 63016
A (L)

Overstreet, Gwen
217 Pine St.
Crystal City, Mo. 63019
A (L)

Flotron, Richard
Rt. 5, Box 63
Festus, Mo. 63028
D (L)

Kausch, Mary Suzanne
4343 Woodridge Dr.
Hillsboro, Mo. 63050
D

Kausch, Michael E.
4343 Woodridge Dr.
Hillsboro, Mo. 63050
A (L)

Daugherty, Patrick L.
4031 Parker Ave.
St. Louis, Mo. 63109
A (L)

3RD CONGRESSIONAL DISTRICT

Buchheit, Beverly
2619 Pennsylvania Ave.
St. Louis, Mo. 63118
D

Wiese, Anita
3752 Hwy 61
Festus, Mo. 63028
D (L)

Stanley, Wayne
Rt. 2, Box 308
Festus, Mo. 63028
D (L)

Lewis, Wm. E.
300 Boyd St.
DeSoto, Mo. 63020
D (L)

Miller, Adaline
3764 Hwy. 61
Festus, Mo. 63028
D (L)

Miller, Ben G.
3764 Hwy. 61
Festus, Mo. 63028
A (L)

Morris, Fred
1791 Jean Dr.
Arnold, Mo. 63010
D (L)

King, Marilyn
2921 Royal Gorge Ct.
St. Louis, Mo. 63129
D/A

Haelteng, Mary A.
5006 Louisiana
St. Louis, Mo. 68111
A (L)

Deckman, Michael D.
648 Madison Dr.
Arnold, Mo. 63010
D

Kucharski, Raymond E.
4430 Little Chief
St. Louis, Mo. 63123
A (L)

Moore, Jr., Robert P.
4008 Bates St.
St. Louis, Mo. 63116

Michaels, Loretta C.
4318 Wichelberger
St. Louis, Mo. 63116
D (L)

Ribaudo, Hon. Anthony D.
5440 Doggett Ave.
St. Louis, Mo. 63110
D/A

Kucharski, Alexandra
4430 Little Chief Dr.
St. Louis, Mo. 63123
D (L)

Dreste, Mary
8964 Big Bend
Webster Groves, Mo. 63119
A (L)

Dreste, William K.
8964 Big Bend
Webster Groves, Mo. 63119
D (L)

Mayer, Emmett C.
6328 Ashbury Dr.
St. Louis, Mo. 63123
D (L)

Bauman, Henry L.
3680 Wilmington
St. Louis, Mo. 63116
A (L)

Laughlin, Patricia L.
5537 A Holly Hills
St. Louis, Mo. 63109
A (L)

Kraus, Thomas J.
4342 Maroon
St. Louis, Mo. 63123
D (L)

Kraus, Eileen
4342 Maroon
St. Louis, Mo. 63123
A (L)

Swift, William O.
6633 Hancock
St. Louis, Mo. 63139
D (L)

Ballew, Judith A.
4035 March Dr.
St. Louis, Mo. 63125
D (L)

Gronemeyer, Dorothy C.
79 Willmore Rd.
St. Louis, Mo. 63109
D (L)

Campbell, James T.
4225 S. 37th
St. Louis, Mo. 63116
A (L)

Raanke, David J.
3323 Magnolia
St. Louis, Mo. 63118
D (L)

Richmann, Harold A
6137 Pointview Ln.
St. Louis, Mo. 63123
A (L)

Sullivan, Sr., Wm. F.
829 Dumont
Lemay, Mo. 63125
A (L)

Brinkman, Bernard
9243 Silver Crest
St. Louis, Mo. 63126
A (L)

3RD CONGRESSIONAL DISTRICT

Northcutt, Ben
4911 Southcompton
St. Louis, Mo. 63111

George, Thomas E.
5518 A. Tennessee Ave.
St. Louis, Mo. 63111
D/A (L)

Anton, Donald C.
10605 Hackmere Dr.
St. Louis, Mo. 63128
D/A (L)

Costello, Linda
7215 Michigan
St. Louis, Mo. 63111
A (L)

Creinheimer, James
6800 Burkemo Ct.
St. Louis, Mo. 63129
D/A

Colligan, John J.
2441 Wembley Dr.
St. Louis, Mo. 63125
D/A

Arden, Frances M.
2722 Creekwood Manor Ln.
St. Louis, Mo. 63125
D/A

Tucker, Jerry R.
45 Mason Ave.
Webster Groves, mo. 63119
D/A

Gralike, Rita J.
648 Buckley Rd.
St. Louis, Mo. 63125
D/A

Gralike, Donald J.
648 Buckley Rd.
St. Louis, Mo. 63125
D/A

Schliefer, JoAnn
Recorder of Deeds
Courthouse
Hillsboro, Mo. 63050
D

Ballew, Judith
4035 Marchi Dr.
St. Louis, Mo. 63125

O'Neill, Matt
6414 Devonshire
St. Louis, Mo. 63109
D/A (L)

McLaughlin, Hilde
10919 Three Court Drive
St. Louis, MO 63123
D/A

McLaughlin, John
10919 Three Court Drive
St. Louis, MO 63123
D/A

Becker, Charles J.
P.O. Box 22
Arnold, MO 63010
D

Londe, Janice
33 N. Maple
Webster Grove, MO 63119
D/A

Harweth, Rebecca A.
401 Walworth
St. Louis, MO 63125
D/A

Meier, Secret Lee
5483 Langsworth Drive
St. Louis, MO 63129
D/A

Willey, Karen M.
1279 Walnut Trail Court
Fenton, MO 63026
314/677-8330
D

3RD CONGRESSIONAL DISTRICT

M. Keith Murphy
1036 Tompkins
St. Charles, MO 63301
A

8504050470 0

3rd P. 9

73

4TH CONGRESSIONAL DISTRICT

Keeland, Roy L.
18930 E. 6th St. North
Independence, Mo. 64056
D/A

Cox, Arlene C.
1002 N. Kurzweil Rd.
Raymore, Mo. 64083
D/A

Cox, Richard
1002 N. Kurzweil Rd.
Raymore, Mo. 64083
D/A

Handly, Pat
RR 1, Box 161
Concordia, Mo. 64020
D

Gaines, Steve III
RR 1
Napoleon, Mo. 64074
D/A

Collins, Jerrie
200 E. Kirk
Harrisonville, Mo. 6470
D/A

Chick, Linda
MNEA-NEA
2100 Salem Dr.
Independence, Mo. 64058
D/A

Butler, Margie
Osage Beach, Mo. 65065
D

Keffer, Jim
Rt. 1
Harwood, Mo. 64750
D/A

Walker, John L.
P. O. Box 525
Camdenton, Mo. 65020
D/A

Wilson, Fred
RR 1
Lone Jack, Mo. 64070
D/A

Koechner, Mary Jane
Hainen Dr.
Tipton, Mo. 65081
D/A

Paris, Myron L.
1909 E. 26th Terrace
Independence, Mo. 64057
D/A

McVey, Daniel
208 E. Madison
Jefferson City, Mo. 65101
D/A

John R. Michael
312 E. Summit Dr.
Blue Springs, Mo. 64015
D/A

Cates, Chas. E.
RR 1, Box 93
Schell City, Mo. 64783
D/A

Edwards, Mr. Carroll "Dean"
Sheetmetal Workers, Local 2
1824 Willowbrook
Blue Springs, Mo. 64015
D/A

Miller, Roy W.
UAW Local 249 Member
1404 Essex Circle
Blue Springs, Mo. 64015
D/A

Smith, Cleonia
Legis. Committee Member
Local 6360
2612 Southeast 1st St.
Blue Springs, Mo. 64015
D/A

Schulz, Gigi
SEIU, AFL-CIO Member
1009 Sunrise Dr.
Blue Springs, Mo. 64015
D/A

Lupkey, Gloria
1409 Sunnycreek Ln.
Blue Springs, Mo. 64015
D

Proffitt, Mary J.
RR 1, Box 169D
Schell City, Mo. 64783
D

Finch, Jr., Floyd R.
116 Mt. Vernon Dr.
Blue Springs, Mo. 64015
D/A

Fleming, Gary W.
202 W. Fourth St.
Sedalia, Mo. 65301
D

Brown, Mary
Maries Co. Collector's Office
Vienna, Mo. 65583
D

Hollis, Eugene
Collector, Maries Co.
Vienna, Mo. 65582
D

Fairfax, Alice
P.O. Box 290
1911 W. Broadway
Sedalia, MO 65301
D

Pike, T. Wayne
730 Kaylyn
Jefferson City, MO 65101
D/A

Cole, Florence
Rt. 2, Box 178A
Holden, MO 64040
D

Wolken, Barbara
1725 Southwest Blvd.
Jefferson City, MO. 65101
D/A

Bar, Sue
Rt. 4, Box 14
Sedalia, MO 65301
D

Bennett, Fran
RR1, Box 445
Grain Valley, MO 64029
D

Handly, Pat
RR1, Box 161
Concordia, MO 64020
D

Walker, John
Box 525
Camdenton, MO 65020
D/A

Adkison, Polly
Route 1, Box 105
Houston, MO 65483
D/A

Burch, Jerry W.
Rt. 1
Walker, MO 64790
D/A

Proffitt, Mary J.
Schell City, MO 64783
D

B50405047111

5TH CONGRESSIONAL DISTRICT

Murphy, Marsha J.
1300 Traders Bank Bldg.
1125 Grand Ave.
Kansas City, Mo. 64106
D/A

Byers, Jonas
4921 E. 41st St.
Kansas City, Mo. 64130
D/A

Pederson, O.F. (Pete)
10809 Beacon Ave.
Kansas City, Mo. 64134
D/A

Sheil, Tim
8959 E. 59th Terrace
Raytown, Mo. 64133

Walsh, James
1823 N. Liberty
Independence, Mo. 64050
D/A

Querry, Sandra A.
13114 Winchester
Grandview, Mo. 64030
D

Vaughan, Cecil
2124 Belmont
Independence, Mo. 64057
D

Crawford, Gayle
14212 E. 37th St.
Independence, Mo. 64055
D/A

Waldrop, Howard A. "Wally"
11222 Corrigton
Kansas City, Mo. 64134

Newman, Dutch
4122 Mercier
Kansas City, Mo. 64111
D

Quick, Trudy Lynn
1536 B Mews Dr.
Kansas City, Mo. 64131
D/A

Obermeier, Glenn E.
10600 E. 98th Terrace
Apt. 2B
Kansas City, Mo. 64134
D/A

McKittrick, Lillian
6301 Rockhill Road
Kansas City, Mo. 64131
D (L)

Baker, Wm. J.
12904 E. 41st Terrace
Independence, Mo. 64055
D

Camerlick, Chas. F.
12509 E. 43rd St.
Independence, Mo. 64055
D (L)

Shields, Katheryn
5622 Rockhill
Kansas City, Mo. 64110
D/A

Grun, Joseph W.
612 N. Pryor
Rt. 8
Lee's Summit, Mo. 64063
D/A

Noteis, Vicki F.
9200 Ward Parkway
P. O. Box 299
Kansas City, Mo. 64141
D

Perez, Jr., Javier M.
301 E. Bannister Rd.
Kansas City, Mo. 64114
D

Foster, James D.
3834 Windsor Rd.
Kansas City, Mo. 64133
D

Foster, Lauret E.
3834 Windsor Rd.
Kansas City, Mo. 64133
D

Jones, Patricia
5907 Rockhill Rd.
Kansas City, Mo. 64110
D/A

Longworth, Glenda
7701 E. 112th Terrace
Kansas City, Mo. 64134
D/A

Obermeier, Glenn E.
10600 E. 98th Terrace
Apt. 2B
Kansas City, Mo. 64134
D/A

Jeffries, Margaret
602 N.E. Burning Tree
Lee's Summit, Mo. 64063
D

Supple, Lucy
7326 Walnut
Kansas City, Mo. 64114
D/A

Barker, C. E.
5808 E. 11th
Kansas City, MO 64126
D/A

Bartels, Willodine M.
2806 North Spring
Independence, MO 64050
D/A

Alery, Beverly
Service Employee Int'l
Local 96 AFL-CIO
4526 Paseo
Kansas City, MO 64110
D/A (L)

Pearson, Walter
Service Employee Int'l
Local 96 AFL-CIO
4526 Paseo
Kansas City, MO 64110
D/A (L)

Brown, Betty M.
17 W. 80th St.
Kansas City, MO 64114
D/A

Spring, Harry Vandem Booche
Greater KC MO Labor Council
625 W. 39th St., Suite 202
Kansas City, MO 64111
D/A

Lewis, Jr., Edward D.
1853 E. 77th St.
Kansas City, MO 64132
D/A

Francis, Meridath
3912 Stayton
Independence, MO 64055
D/A

Berry, Gene A.
Business Rep.
Local 96
SEIU-AFL-CIO
4526 Paseo
Kansas City, MO 64110
D (L)

Berry, Carolyn M.
10721 Fuller
Kansas City, MO 64134
D

Supple, Kathleen
7326 Walnut
Kansas City, MO 64114

Matthews, Mary Olah
116 S. Hedges
Cottage #6
Sugar Creek, MO 64054
816/461-0490
D/A

Villineo, Joyce
1206 Indiana
Kansas City, MO 64127
D

Otto, Mary Castrop
3601 E. 105th Terrace
Kansas City, MO 64137
D

Smith, Mary Lou
6837 Lake Shore Dr.
Raytown, MO 64133
D

Northcraft, Kenneth W.
3505 Ruppert Road
Kansas City, MO 64137
D (L) Comm. Workers

Waris, Bill
Jackson Co. Executive
Jackson County Courthouse
415 E. 12th St.
Kansas City, MO 64106
D

Peterie, Gula J
6436 E. 12 th Terrace
Kansas City, MO 64126
D/A

Jeffries, Louis J.
602 N. E. Burning Tree
Lee's Summit, MO 64063
D/A

Benson, Rep. Karen McCarty
1111 Valentine Road
Kansas City, MO 64111
D/A

Clark, Hattie
10600 E. 98th Terrace
Apt. 3B
Kansas City, MO 64134
D/A

Cromer, Shirley
Missouri NEA
612 Eastland Drive
Jefferson City, MO 65
D/A

Kennedy, Dorothy
8031 E. 130th Ct.
Grandview, MO 64030
A

Payne, Pamela L.
5203 N. Walrond
Kansas City, MO 64119
D/A

Ray, Virginia L.
9000 Evanston Ct.
Kansas City, MO 64138
A

Bridges, Ramona
1226 S. Ash
Independence, MO 64052
D/A

Carnes, John
701 S. Park
Independence, MO 64052
D/A

Hudson, Donald
8828 E. 62nd Street
Raytown, MO 64133
D/A

Medley, Leila
1300 N. 6th Terrace
Blue Springs, MO 64015
816-252-4480
D/A

5th CONGRESSIONAL DISTRICT

Bowman, Jr., Theodore F.
8100 East 66th St.
Kansas City, MO 64133
D/A 816/356-2481

Hernandez, Robert
2107 Holly
Kansas City, MO 64108
D/A

Jackson, Maudiene C.
Local Union No. 509
4526 Paseo
Kansas City, MO 64110
D/A

Welsh, W. Russell
649 W. Meyer Boulevard
Kansas City, MO 64113
D

Wessley, Nancy J.
8328 Elm
Raytown, MO 64138
D/A

Williams, John B.
8821 Ivanhoe
Kansas City, MO 64114
D

Baker, William J.
12904 East 41st Terrace
Kansas City, MO 64055
D/A

Collins, Donna
1505 Little Apt. 10
Grandview, MO 64030
D/A

Twyman, Deborah
416 N. Delaware
Independence, MO 64050
D/A

Van Wagner, Sandra Lee
4916 N. E. Marvin Road
Kansas City, MO 64118
D/A

Lu Vaughan
11927 E-40 Highway
Independence, MO 64055
D/A

Linda Griffith
1601 N. River
Independence, MO 64050
1-816-461-6291
D/A

3504050471

6TH CONGRESSIONAL DISTRICT

Cox, Freda M.
Rt. 3, 1034 First St.
Platte City, MO 64079
D

Swofford, Pamela
176 Benton
Richmond, MO 64085
D

Hudson, Norman
8007 N. Stoddard
Kansas City, MO 64152
D/A

Maples, Thomas T.
Box 42-M, Route 1
Edgarton, MO 64444
D/A

Cox, Martin
Rt. 3, 1034 First St.
Platte City, MO 64079
D (L) UAW Retired

Fulton, Richard M.
322 S. Fillmore
Maryville, MO 64468
D

Armour, Charles S.
232 Farris St.
Richmond, MO 64085
D/A

Proffitt, Curtis R.
RR 4
Richmond, MO 64085
D

Proffitt, Lisa
RR 4
Richmond, MO 64085
D

Fairbanks, Floyd J.
Rt. 1
King City, MO 64463
D

Berry, Linda
Rt. 1, Box 138
Glenwood, MO 63541

Richardson, F. Elaine
116 Forest Lane
Excelsior Springs, MO
D/A 64024

Shea, John M.
2222 South 15th
St. Joseph, MO 64503
D/A

Snell, F. S. (Matt)
UAW Local 249
RR4, Box 446
Liberty, MO 64068
D/A

Ward, Van Wayne
107 Lakeview Drive
Excelsior Springs, MO
D 64014

Berry, Linda
Route 1, Box 138
Glenwood, MO 63541
D

Burke, Kathy
8427 N.W. 68th Street
Kansas City, MO 64152
D/A

Collyge, Helena C. (Cathy
1709 N.E. 67th Street
Gladston, MO 64118
D/A

Cooper, Jerry R.
3414 Messanie
St. Joseph, MO 64501
D/A

Ducaulombier, Emil
4215 N. Chelsia
Kansas City, MO 64117
D/A

Harris, Shirley J.
114 West Linve Street
Excelsior Springs, MO
64024
D/A

McCarroll, Norma L.
1107 St. Paul
Excelsior Springs, MO
D/A 64024

Machender, Joyce
6114 N. Woodland
Gladstone, MO 64118
D/A

Pennington, Faye D.
RR2, Box 101
Lathrop, MO 64465
D/A

Stephenson, Lonnie
804 N.E. 74th St.
Gladstone, MO 64118
D/A

Williams, Virginia
5819 North Garfield
Gladstone, MO 64118
D/A

Beshears, Kelsy B.
3414 Messanie St.
St. Joseph, MO 64501
D

Breen, Bridget
5300 N.W. 83rd St.
Kansas City, MO 64151
D/A 816/741-1638

Garvey, Lawrence J.
501 Payne Terrace
St. Joseph, MO 64506
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Garvey, Shriley J.
501 Payne Terrace
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D

Grant, Shirley
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Gladstone, MO 64118
D/A

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5819 N. Garfield
Gladstone, MO 64118
D/A

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1913 Larkspur Drive
Liberty, MO 64068
D/A

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7 West Mill St.
Liberty, MO 64068
D

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8418 N. W. 68
Kansas City, MO 64152

Luttoneske, Donna Delores
1513 N. Widners Road
Liberty, MO 64068
D/A

Bridgeman, Frances
9800 N. W. 75th Terrace
Kansas City, MO 64152
D

Langston, David
1063 N. McGee
Kansas City, MO 64155
D/A

Worthey, Edward R.
300 N. E. 90th Terrace
Kansas City, MO 64155
D/A

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Chillicothe, MO 64601
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Kansas City, MO 74117
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Chapman, Bill
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1602 N. E. nd St.
Gladstone, MO 64118
D/A

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5505 S. 38th Terrace
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Kansas City, MO 64119
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Kansas City, MO 64117
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Gladstone, MO 64118

Sprang, Patricia
1702 N. E. 74th Terrace
Gladstone, MO 64118

French, Melvin E.
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Kansas City, MO 64116
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3108 N.E. 65th Terrace
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D/A

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R2, Box 44
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D/A

Geisler, Mitchel F.
c/o Wood & Huston Bank
Marshall, MO 65340
D/A

Hailey, Sallie
Bos 10
Arrow Rock, MO 65320
D

Hale, DeLoren "Dee"
1302 Minuteman Drive
Plattsburg, MO 64477
D/A

7TH CONGRESSIONAL DISTRICT

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3259 S. Elmira
Springfield, MO 65087
D (L)

Harker, Debra
1334 W. Downing
Springfield, MO 65807
D

VanDerbeek, Jeane
2708 Massachusetts
Joplin, MO 64801

Stombaugh, Tom A.
801 S. Kickapoo
Springfield, MO 65804
D/A

Stombaugh, Helen D.
801 S. Kickapoo
Springfield, MO 65804
D/A

Andrews, Jerald T.
P.O. Box 392
Bolivar, MO 65613
417/326-5281 or 7412
D

Pearl, Peggy
847 S. Pickwick
Springfield, MO 65804
D

Tampo, Steve
119 S. Washington
P.O. Box 276
East Side Square
Neosho, MO 64850
D

DeCarlo, Dan
1122 E. Loren
Springfield, MO 65807
D

Kilby, Brenda J.
Route 1, Box 86
Jane, MO 64846

Whitesell, Dillard D.
Route 1, Box 470
Bois D'Arc, MO 65612
D

Bodanski, Dr. William
2419 Claremont Circle
Springfield, MO 65804.
D/A

Shilling, Danny
Rt. 1, Box 700
Bois D'Arc, MO 65612
D

Hamra, Jr., Sam
Atty & Counselor
1949 E. Sunshine
Springfield, MO 65804
D

Rooney, Harold G.
312 Lincoln Street
Monett, MO 65708
D/A

Groundwater, Mary E.
1127 W. Edgewood
Springfield, MO 65807
D

8TH CONGRESSIONAL DISTRICT

Miley, Pat
P.O. Box 215
Winona, MO 65588
D/A

Marble, Sue
1110 Ruth
Sikeston, MO 63801
D/A

Glenn, Mary B.
Greenville, MO 63944
D

LaBarge, Jennie
Rt. 4, Box 341
Rolla, MO 65401

Casey, John
1600 Price Drive
Cape Girardeau, MO 63701
D/A

Allgood, Roger
535 N. Sprigg St.
Cape Girardeau, MO 63701
D/A

Chapman, Steve
1853 Belleridge
Cape Girardeau, MO 63701
D/A

Chitwood, Larry
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Lesterville, MO 63654
D/A

Chitwood, Gail
Rt. 1, Box 86
Lesterville, MO 63654
D/A

Young, A. Darlene
Star Route
Jackson, MO 63766
D/A

Young, Jimmy Dale
Star Route
Jackson, MO 63766
D/A

Franklin, John Ray
Rt. 4, Box 257
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Sample, Barbara
735 Melody Lane
Cape Girardeau, MO 63701
D/A

Cunningham, Darlene
2801 Bloomfield Road
Cape Girardeau, MO 63701
D/A

Cunningham, Kenneth
2801 Bloomfield Road
Cape Girardeau, MO 63701
D/A

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D/A

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Annapolis, MO 63620
D/A

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Annapolis, MO 63620
D/A

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D/A

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Star Route, Box 204
Annapolis, MO 63620

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307 Hardin
Sikeston, MO 63801
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D/A

Scoter, Dean
23 McFarland Dr.
Rolla, MO 65401
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417/256-6090
D/A

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Rt. 1, Box 127
Glen Allen, MO. 63751
314/238-3960
D/A

Joherst, Viola
120 N. 6th St.
Ste. Genevieve, MO 636
D/A

Kernell, Joyce
Gipsy, MO 63750
D/A

Ladd, Martha
Rt. 4
Gipsy, MO 63750
D/A

Stevens, Larry L.
Rt. 2
Advance, MO 63730
D/A

Maltbia, Pat
1000 1st St.
New Madrid, MO 63869
D

Mondale

Lane, Christy
Rt. 5, Box 20
Jon Don Acres
Sikeston, MO 63801
D

Jacobs, Arthur W.
Rt. 4, Box 191
Salem, MO 65560
D

Firebaugh, Emily R.
148 E. Main St.
Fredericktown, MO 63645
D

Glenn, Mary B.
Greenville, MO 63944
D

Ank, Dorothy
2628 Azalea Lane
Cape Girardeau, MO 63701
D/A

Bodanski, M.D., William
2419 Claremont Circle
Springfield, MO 65804
D/A

Hale, Sarah W.
504 S. Frederick St.
Cape Girardeau, MO 63701
A

Hoffmeister, Hope
Rt. 3, Box 116a
Ste Genevieve, MO 63670
D

Mondale, Lester
Copperhead Cliff
Rt. 3, Box 461
Fredericktown, MO 63645
D

Odom, Sherman R.
Vandivort Drug Store
118 W. Fourth St.
Salem, MO 65560
D/A

McKee, Susan H.
Rt. 1, Box 4-C
Beaufort, MO 63013
D/A

Watkins, Michille D.
P.O. Box 343
Sullivan, MO 63080
D

Benson, Mabel
602 N. Missouri
Potosi, MO 63664
D

Burch, Billy M.
658 N. Manney
Sikeston, MO 63801
D/A

Davis, Robert T.
128 Linda
Sikeston, MO 63801
D/A

Klipfel, Lucille M.
2000 Woodlawn
Cape Girardeau, MO 63701
D/A

Klipfel, Herman J.
Route #6, Grandview Acres
Jackson, MO 63755

Riddick, Douglas
710 Huffman Avenue
Portageville, MO 63873
D/A

Riddick, Marge
710 Huffman Avenue
Portageville, MO 63873
D/A

Lindsey, Stella
P.O. Box 127
Doe Run, MO 63637
D/A

Conklin, Virginia T.
P.O. Box 41
Kelso, MO 63758
D/A

Conklin, Johnny Ray
P.O. Box 41
Kelso, MO 63758
D/A

Bowden, Jr., Herschel A.
123 W. Main St.
Portageville, MO 63873
D/A

Blisset, Frances
Rt. 1, Box 196
Oran, MO 63771
D/A

Harris, Janet
Cedar Grove Rte.
Salem. MO 65560
D/A

9TH CONGRESSIONAL DISTRICT

Anderson, Drucilla
602 W. Walsh
Vandalia, MO 63382
D/A

Avery, R. Franklin
524 11th
Washington, MO 63090
314/239-5520
A

Backer, Rep. Gracia Yancey
Rt. 2, Box 258
New Bloomfield, MO 65063
D

Bennett, Mitchell
Business Manager
Public Service Employees'
Local Union No. 45
110 N. 8th St.
Columbia, MO 65201
D Labor

Bonzani, Pat
Rt. 2, Box 247
New London, MO 63459
D/A

Bowzer, Jr., Truman E.
1069 Sunset Drive
Macon, MO 63552
D/A

Burlison, James
1021 Ashland Gravel Road
#803
Columbia, MO 65201
D

Cooley, Mr. Carmen John
421 Malone
Macon, MO 63552
D/A

Cooley, Irene
421 Malone St.
Macon, MO 63552
D/A

Cross, Robert R.
524 W. Highway N.
Wentzville, MO 63385
D Labor

DeLuca, Joseph A.
510 Central Ave.
Hannibal, MO 63401
D/A

Dillmon, Martha A.
307 Steinbogen
Warrenton, MO 63383
D/A

Douglass, Donald D.
4000 Barberry Ave.
Columbia, MO 65202
D

Douglass, Lois
4000 Barberry Ave.
Columbia, MO 65202
D

Dunbar, Ruby
Rt. 4, Box 30
Kirksville, MO 63501
D/A

Fugit, Olin
Rt. 1, Box 276
Rocheport, MO 65279
D/A

Fugit, Phyllis L.
Rt. 1, Box 276
Rocheport, MO 65279
D/A

Goodin, Margaret McIlroy
315 W. Church St.
Bowling Green, MO 63334
D

Gunter, Roy E.
P.O. Box 81
Benton, MO 63736
D/A

Hampton, Delores
604 S. Bradford
Kirksville, MO 63501
D/A

Harris, Ruth
118 Pine Grove Village
Columbia, MO 65202
D/A

Hermann, Emogene
Johnson Lane
Robertsville, MO 63072
D

Hibbard, Paul
Rt. 4, Box 89A
Moberly, MO 65270
D/A

Hosack, Jacqueline M.
Rt. 51, Box 451 E
O'Fallon, MO 63366
D/A

Kenoyer, Loren
Box 437
Warrenton, MO 63383
D/A

Kramer, Sr., Melvin I.
Route 1, Box 115
Truxton, MO 63381
D

Long, Cheryl A.
2 Holman Lane, Box 548
Macon, MO 63552
816/385-2571
D/A

Long, Robert
2 Holman Lane, Box 548
Macon, MO 63552
816/385-2571
D/A

Michler, Gilbert A.
Rt. 4, Box 156
Troy, MO 63379
D Labor

9TH CONGRESSIONAL DISTRICT

Worley, Kenneth L.
720 Winston Place
O'Fallon, MO 63366
D

Vogt, Linda
1725 Paris Road
Columbia, MO 65201
D/A

Crow, Hiawatha M.
2204 Spruce
Hannibal, MO 63401
D

Clark, Jean A.
625 Olive Street
Hannibal, MO 63401
D/A

Rose, Mary Catherine
Clark County Committeewoman
RR 2, Box 33
Revere, MO 63465
D

Kelly, Rep. Christopher S
705 Glenwood Ct.
Columbia, MO 65201
314/442-2887
D/A

Hosack, Leroy C.
Rt. 5, Box 451 E
O'Fallon, MO 63366
D

Allensworth, Annice
c/o Paul Hibbard, 9th Dist
Chairman
Moberly, MO 65270
D/A

Allensworth, R.J.
c/o Paul Hibbard, 9th Dist
Chairman
Moberly, MO 65270
D/A

Miller, Ron
6 Catalina Drive
Kirksville, MO 63501
D/A

Ricks, John W. (Jack)
805 N. Main
Monroe City, MO 63456
D/A

Sanders, Bonnie
Box 11
Lake Shenwood, MO 63357
D

Susan
r Dirve
ers, MO 63376

Spears, Dennis W.
315 S. Clark
Moberly, MO 65270
D/A

Stephens, Dee
3418 Woodrail Terrace
Columbia, MO 65201
D/A

Sutton, Bobbi
505 S. Utterback
Vandalia, MO 63382
D/A

Swetnam, Juanita
504 Fulton Ave.
Moberly, MO 65270
A

Tyler, Eugene F.
Route 1, Box 892
Union, MO 63084
583-5598
D/A

Willett, Billie
Route 5, Box 76
Fulton, MO 65251
D/A

Mondale

Duncan, Ronnie
Rt. 2, Westview Dr.
Holts Summit, MO 65043
D

Fleer, Kenneth
RR 2, box 224
Washington, MO 63909
D

Jung, Greg
601 N. Main St.
Farber, MO 63345
D/A

Linville, Mary Ann
1005 Porter
Moberly, MO 65270
D/A

Rose, Mary Catherine
Clark County Committeewoman
RR 2, Box 33
Revere, MO 63465
D

Wilson, Emma J.
Paris, MO 65275
D

Fry, Johnny B.
Rt. 2, Box 40
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D

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#3 Holmon Lane
Macon, MO 63552
A

Melker, Theresa
Rt. 4, Box 195B
Moberly, MO 65270
D/A

Reed, Dale R.
401 Crestview Drive
Union, MO 63084
D/A

9TH CONGRESSIONAL DISTRICT

Mondale

Volkmer, U.S. ~~Rep.~~ Harold

D/A

Volkmer, Mrs. Harold

D/A

Wells, Bruce
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D

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SB 40

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Joseph R. Quinn
Alternate:
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CD 2 Rep. Thomas Downey (D)
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Paul Harenberg
Patrick Halpin
Alternate:
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NYSUT Member

CD 3 Rep. Robert Mrazek (D)
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Judith Gardner
Angelo F. Orazio
Jan D. Pierce*
Floyd Sarisohn
Alternate:
George Kopp
Union Member

CD 4 Rep. Norman Lent (R)
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Delegates:
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Joan M. Flatley**
Arthur Reinback
Julius Seide*
Robert Zimmerman
Alternates:
John Ruggiero*
Carole Tabin**

CD 5 Rep. Raymond McGrath (R)
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Rener Reed
Jerome B. Fleischman
Judy Sanford Guise
Pearl Weill
Alternates:
Hazel Coads
Harold Forma
Union Member

CD 6 Rep. Joseph Addabbo (D)
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Brenda White*
Andrew Jenkins
Shirley Jenkins
Brownie Davis
Margaret Calumbraro
Alternates:
Rosina Zanazzi
Stanley Hill*
Union Member

CD 7 Rep. Gary Ackerman (D)
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Delegates:
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Elaine Weinstein
Ralph Goldstein
Sandra Povman
Anthony Menna
Ruth Bloom
Alternates:
Richard Rubin
Louise Feller

CD 8 Rep. James H. Scheuer (
(Cited for identification purposes only — delegate candidate)

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Saul Weprin
Aileen B. Ryan
Toby Ann Stavisky
Murray LeWinter
May W. Newberger
Julia Harrison
Alternates:
Honey Miller
John C. Donohue*
Union Member

CD 9 Rep. Geraldine Ferraro
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Bertine Lafayette**
Walter Crowley
Frances Luhmann
Arthur Egel**
Alternate:
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NYSUT Member

CD 10 Rep. Charles Schume
(Cited for identification purposes only delegate candidate)

Delegates:
Joni Yoswein
Herbert Berman
Max Sultan
Ann Kessler**
Steven Goldinkranz
Selman Coyne
Alternates:
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Beatrice DeSapio
NYSUT Member

CD 11 Rep. Edolphus Town
(Cited for identification purposes only delegate candidate)

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Louise DeBow*
Burt Roberts
Jeannette Gregory**
Gerald Harawitz**
Alternates:
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Vivian Patterson
Union Member
NYSUT Member

CD 12 Rep. Major Owens
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Delsie Ward*
Samuel Intrator
Thurman Smith
Myrna Zisman

Alternates:
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Valarie Varrati
Union Member

CD 14 Rep. Guy Molinari (R)
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Mary Codd
Joseph Shannon**
Carol Angelino*
John Nersten, Jr.

Alternate:
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NYSUT Member

CD 13 Rep. Stephen Solarz (
(Cited for identification purposes only — not delegate candidate)

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Irene Barbaro
Charles Dome
Marion Miller
Jerry Landman*

Alternates:
Florence Gerges
Harry Schwartz
Union Member

CD 15 Rep. Bill Green (R)
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Sandra Feldman**
Thomas Halman
Denise Fuge
Steven Rosen
Carmen Calon*

Alternates:
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Peter Philip
Union Member
NYSUT Member

CD 16 Rep. Charles Rangel (D)
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Elois Banks
Anibal Salivan Roman*
Sara Morgan
Eugene Callender
Joan Serrano Laufer

Alternates:
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Sydelle Knepper
Union Member

CD 17 Rep. Ted Weiss (D)
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Ponsie Hillman**
Franz Leichter
Ruth Messinger
G. Oliver Koppell
Betty Friedan
William Nuchow*
Irene Simon

Alternates:
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Myrna Quinones*
Stanley Michels
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NYSUT Member

CD 18 Rep. Robert Garcia (D)
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Aurelia Green
Joseph L. Galiber
Lillian Vega
Dorothy White*

Alternates:
David Rosado
Nilda Munoz
Union Member

CD 19 Rep. Mario Biaggi (D)
(Cited for identification purposes only — not delegate candidate)

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Sandra Parness
Gerald V. Esposito
Shirley K. Werthamer
Guido P. Menta*

Alternates:
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Florence B. Donohue
Union Member

CD 20 Rep. Richard Ottinger (D)
(Cited for identification purposes only — not delegate candidate)

Alternates:
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Judy Lerner**
NYSUT Member

CD 21 Rep. Hamilton Fish, Jr. (R)
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Fredrica S. Goodman
Michael J. Riolo*
Angela F. Magill

Alternate:
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Union Member

CD 22 Rep. Benjamin Gilman (R)
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John Grant
Judith McFatter**
Eleanor J. Habig
Joseph Wasser

Alternate:
Irene Fox
NYSUT Member

CD 24 Rep. Gerald Solomon (R)
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June B. Gurnett**
William L. McGowan*
Lucille Patterson

Alternate:
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Union Member
NYSUT Member

CD 25 Rep. Sherwood Boehlert (R)
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Daniel Mahoney**
Fred Miller**
Patricia Crandall*

Alternate:
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NYSUT Member

CD 26 Rep. David Martin (R)
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Anita Maxwell
Catherine Young**
Union Member
NYSUT Member

CD 27 Rep. George Wortley (R)
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Delegates:
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Rosemary Pooler
Jack Webb
Betty Bone Schiess

Alternate:
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CD 28 Rep. Matt McHugh (D)
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CD 29 Rep. Frank Horton (R)
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CD 30 Rep. Barber Conable, Jr. (R)
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CD 31 Rep. Jack Kemp (R)
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CD 32 Rep. John LaFalce (D)
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15th District

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Groveport,

James F. Hagan
1054 NW Blvd
Grandview Hts,

NONDALE

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650 Garrett Dr
Cols,

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Cols, 43220

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131 E. Blake
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Cols, 43201

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819 Wager St
Cols, 43206

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London, 43140

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14th District

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772 Orlando Ave
Akron, Ohio 44320

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463 Moreley Ave
Akron, Ohio 44320

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644 Easter Ave
Akron, Ohio 44307

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Kathy O'Brien
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Phillips Street
Shawnee, 43782

Roger Treadway
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Karen E. Smith
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Springboro,

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Pemberville, Ohio 43450

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Fremont, Ohio 43420

Fern E. Meffert
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Fremont, Ohio 43420

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A Alice Kleman
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A Joan Ruen
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4th District

NONDALE

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3261 Allentown Rd.
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Galion, 44833

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Carey, 43316

Thomas R. Frey
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3rd District

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2nd District

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Nellie Basconi
827 Shady Avenue
Sharon, PA 16146

Anthony Rainaldi
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Ambridge, PA 15003

Paula Clark
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Washington, PA 15301

Babe Defino
Box 34
Ohiopyle, PA 15470

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Bradford, PA 16701

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Whitehall, PA 18052

Linda Wallitsch
2043 Greenwood Street
Allentown, PA 18103

Emrich Stellar
118 Keene Street
Center Valley, PA 18034

Theresa Barrett
816 Woodlawn Street
Scranton, PA 18509

Luther Snyder
122 Mauch Chunk
Nazareth, PA 18104

Evelyn Jarrow
608 Beech Street
Old Forge, PA 18518

Marilyn Vitali
1921 Parr Street
Scranton, PA 18504

Harold McCusker
320 Brook Street
Peckville, PA 18452

Chris Scopeletti
536 Main Street
Peckville, PA 18452

Edward Sherman
130 S. 8th Street
Allentown, PA 18103

Emrich Stellar
118 Keene Street
Center Valley, PA 18034

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Fredericktown, PA 15333

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Sheron, PA 16146

John Regoli
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New Kensington, PA 15068

Nancy Billick
Grand Blvd. and Marion Avenue
Monesson, PA 15146

Louis Mihalich
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Monesson, PA 15146

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Edgewood, PA 15221

Barbara Burns
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Pittsburgh, PA 15212

Ivan Itkin
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Pittsburgh, PA 15208

Virginia Kelly
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Pittsburgh, PA 15213

Thelma Lovette
2937 Webster Avenue
Pittsburgh, PA 15219

Moss Murphy
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Pittsburgh, PA 15217

Patrick Landry
1521 Fallowsfield Avenue
Pittsburgh, PA 15217

Jean Griffith
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Greensburg, PA 15601

Helen Whiteford
RD 1
Ebensburg, PA 15931

Blair Pawlowski
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Ebensburg, PA 15931

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90 Barbara Road
Drexel Hill, PA 19026

Michael Aquiline
606 Churchill
Pittsburgh, PA 15235

Luther Snyder
122 Mauch Chunk
Nazareth, PA 18103

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Howard Wise
Rural Route
Spring Mills, PA 16875

Kathleen Flynn Reda
70 West Prospect Street
Washington, PA 15361

Rich Trumka
900 15th Street N.W.
Washington, DC 20005

Debbie O'Dell Seneca
335 North Main Street
Washington, PA 15361

Thomas Carney
951 East 9th Street
Erie, PA 16508

Patricia Liebel
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Erie, PA 16508

Dolores Bross
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Erie, PA 16508

Kathleen Smith
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Swissvale, PA 15218

Noreen Terrick
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Munhall, PA 15120

William Knight
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Munhall, PA 15120

Valerie Bortner
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York, PA 17403

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Pittsburgh, PA 15237

Bobbie Breyer
1815 Tilton Drive
Pittsburgh, PA 15241

Ernest Kline
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Palmyra, PA 17078

Carol Bloch
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Allentown, PA 18104

Karen Ritter
944 Oak Street
Allentown, PA 18102

Frankie Mae Jeter
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Pittsburgh, PA 15210

Joseph Manko
Packard Building 8th Floor
15th and Chestnut
Philadelphia, PA 19102

Frank Faye
162 Main Street
Jeansville, PA 18227

Barbara Bishop
439 W. Cunningham Street
Butler, PA 16001

Elizabeth Verterrano
901 N. Mercer Street
New Castle, PA 16101

Lois Wood
806 35th Street
Beaver Falls, PA 15010

James McQuown
340 Church Street
Indiana, PA 15701

Peter Steege
1159 Bank Street
Beaver, PA 15009

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Rhode Island

WALTER F. MONDALE

DEMOCRAT - FEMALE

Coliseum

sition Ballot

13 DELEGATES

FIRST CONGRESSIONAL DISTRICT

Renay Belisle	240 Jenckes Street, Woonsocket
Susann Guglielmo Della Rosa	60 Don Avenue, East Providence
Paula J. Demers	935 East Main Road, Middletown
Patricia Houlihan	113 Arnold Street, Providence
Catherine B. Howard	195 Elmgrove Avenue, Providence
Malinda Howard-Weiner	195 Elmgrove Avenue, Providence
Linda J. Kushner	560 Lloyd Avenue, Providence
Kathleen A. Magill	33 Hutchinson Avenue, Pawtucket
Denise Panichas	18 Mavis Street, Pawtucket
Jeanette L. Restivo	49 Belcourt Avenue, North Providence
Rochelle H. Seberg	59 Crest Street, Middletown
Anna R. Sullivan	5 Chiswick Court, Smithfield
Diane Witman	64 Hazard Avenue, Providence

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Rhode Island

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(POSITION ON BALLOT) WALTER F. MONDALE, DEMOCRAT, MALE, 1st DISTRICT

POS.	NAME	CITY	STREET	NO:
1	Drapeau, William L.	E. Providence	17 Case Street	002
2	Mooney, Michael	N. Providence	30 East Avenue	008
3	Restivo, Edmund A.	N. Providence	49 Belcourt Ave.	012
4	McIenna, Robert J.	Newport	47 Everett St.	006
5	Weiner, Mari S.	Providence	195 Elmgrove Ave.	014
6	Mancini, Salvatore	N. Providence	1918 Smith Street	005
7	Panichas, George T.	Pawtucket	18 Mavis Street	009
8	Press, Harvey B.	N. Providence	39 Marconi Street	010
9	Molloy, D. Scott, Jr.	Barrington	505 County Road	007
10	Ryan, Thomas J.	Providence	17 Seamans Street	013
11	Kilmark, Robert D.	Barrington	56 Elm Lane	004
12	Witman, Gary B.	Providence	64 Hazard Ave.	015
13	Donnelly, Humphrey J..III	Newport	35 Mann Ave.	001
14	Gilgun, John J.	Central Falls	87 Jenks Ave.	003
15	Duattrocchi, Rocco A.	Providence	15 Messina Street	011

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- Rhode Island

PAGE NO. 00001
01/01/80

(POSITION ON BALLOT) WALTER F. MONDALE, DEMOCRAT, FEMALE, 2nd DISTRICT

POS.	NAME	CITY	STREET	NO:
1	Aubermen, Karin N.	S. Kingstown	10 Linden Drive	001
2	Slinev, Anne M.	Providence	77 Verndale Ave.	011
3	Rosenstein, Bea	Providence	2 Jackson Walkway	008
4	DiValerio, Carolyn A.	S. Kingstown	Ministerial Road	002
5	Hazard, Margaret M.	N. Kingstown	75 Oak Hill Road	004
6	Ryan, Priscilla D.	Warwick	9 Plantation St.	010
7	Lawrence, Madeleine	Coventry	28 Paulette Drive	006
8	Donilon, Theresa A.	Providence	80 Lexington Ave.	003
9	Weiner, Ruth Cornell	Providence	2 Jackson Walkway	012
10	McGrath, Patricia T.	Cranston	63 Humbert Ave.	007
11	Ruggieri, Elaine J.	Cranston	51 Country Lane	009
12	Kane, Lorraine L.	Warwick	24 Nelick Road	005

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Rhode Island

PAGE NO. 00001
11/01/80

(POSITION ON BALLOT) WALTER F. MONDALE, DEMOCRAT, MALE, 2nd DISTRICT

POS.	NAME	CITY	STREET	NO:
1	Boeniger, Henry	Westerly	Danielle Avenue	002
2	Mulvey, Joseph V.	Cranston	35 Turner Ave.	013
3	Forcier, Robert R.	Coventry	17 Osprey Drive	008
4	Caprio, Frank	Providence	160 Vinton St.	004
5	Ruggieri, James A.	Cranston	12 Michael Drive	016
6	Berricelli, David D.	Cranston	67 Lake Garden Dr.	001
7	Robertson, Stephen	Providence	38 Moore St.	015
8	Nee, George H.	Providence	77 Verndale Ave.	014
9	DeLorenzo, Joseph A., Jr.	Cranston	112 Zinnia Drive	006
10	McGann, John F.	Providence	44 Compton Street	010
11	Montanaro, Frank J.	Cranston	39 Weaver St.	012
12	McElroy, Edward J., Jr.	Warwick	49 Douglas Road	009
13	Conlon, Donald F.	Warwick	10 Butler Court	005
14	Byrne, Martin T.	Providence	145 Nelson Street	003
15	DiOrio, Ronald L.	Scituate	Hartford Pike	007
16	~~McHugh, Kevin F.~~	Providence	151 Jastram Street	011

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1st Congressional District - MONDALE

APPROVED LIST OF CANDIDATES FOR DELEGATES AND
ALTERNATES FOR THE DEMOCRATIC NATIONAL CONVENTION - 1964

People whose names do not appear on this list cannot run for Delegate or Alternate

NAME

Rhonda Allgaier, Seattle 11745 Palatine N. 98133
William E. Ames, Seattle 4507 Stanford Ave. E. 98105
Todd D. Anderson, Edmonds 22925 Edmonds Way #E-22 98020
Elaine M. Becker, Seattle 19809 Ashworth Ave N. 98133
Margaret Bernard, Edmonds 705 Brookmere Dr. 98020
Tom L. Carter, Bothell 6914 N.E. 204th 98011
Ronald Culbert, Edmonds 14826 61st West 98020
Michael J. Donegan, Courtland Pl. N., Seattle 14037 98103
Dolores Doninger, Bremerton 3218 View Dr NE
Gregory E. Enright, Poulsbo 19734 22nd Ave. NE. 98370
Nancyhelen Fisher, Seattle 2321 N. 147th 98133
Leonard A. Fulton, Bothell 10613 N.E. 194th St. 98011
Maura Settles Goodwin, Mountlake Terrace 4702 229th Pl SW. 98043
Edward H. Gruger, Jr., Seattle 3727 NE. 193rd 98155
Richard E. Hays, Alderwood Manor 17822 36th St. 98037
Virginia Henry, Seattle 1200 N.E. 143rd Apt 315F 98125
William J. Holt, Snohomish 15220 91st Ave.
John Horsley, Poulsbo 5056 N.W. Lakeside Rd. 98370
C. P. Johnson, Bothell 17823 88th N.E
Susan Johnson, Seattle 18242 24th N.E. 98155
John Vernon Kamm, Lynnwood 16120 36th AVE W. #A12 98037
Abraham C. Keller, Seattle 3842 N.E. 90th St. 98115
N. Kathleen Kellogg, Kirkland, 6123 122nd Ave. N.E 98033
Vernon A. Koenig, Kirkland 13022 N.E 87th 98033
Reese Lindquist, Seattle 33434 8th AVE So. FEDERAL WAY 98003
Donna Lurie, Woodinville 19331 196th AVE N.E. 98072

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1st Congressional District - MONDALE 2

APPROVED LIST OF CANDIDATES FOR DELEGATES AND ALTERNATES FOR THE DEMOCRATIC NATIONAL CONVENTION - 1984

People whose names do not appear on this list cannot run for Delegate or Alternate

Martin M. Madson, Everett 13726 MERIDIAN PL. W. 98204

David T. McDonald, Seattle 1000 NORTON BLDG. 98104

Tony Monfiletto, Alderwood Manor 3031 206th PL. S.W. 98036

James R. Novel, Bothell 310 180th Pl. S.W. 98012

Dennis L. O'Mohundro, Bothell 7834 NE 145th St. 98011

Elaine Phelps, Seattle 17238 10th AVE N.W. 98177

Evelyn F. Reider, Seattle 1018 N.E. 96th 98115

Bonnie B. Sandahl, Alderwood Manor 1814 200th St. S.W. 98036

Mel Savage 2800 1st AVE # 216 98121

Tina Scher, Edmonds 20227 87th Ave. W. 98020

Julianne W. Seeman 3000 Landerholm Circle S.E, Bellevue 98007

Blaine R. Sherfinski, Bremerton 3075 N.E. 72nd St. 98310

Ben Shuey, Seattle 15717 1st N.W. 98177

Bob Slater, Seattle 11327 35th AVE. N.E. 98125

Jack J. Spitzer, Kirkland P.O. Box 2008 98033

Cynthia Sullivan, Seattle 9300 42nd Ave N.E. 98115

Mary Tally, Kirkland 12119 N.E. 64th 98033

Mary Terry, Bainbridge Island 13193 Madison N.E. 98110

Tony Volchok, Kirkland 12801 Juanita Dr. N.E. 98034

Sylvia Vranich, Everett 13009 E. Gibson Rd #R-231 98204

Kenneth G. Walsh, Silverdale 3291 N.W. Melody Lane 98383

Ching-Pi Wang, Bellevue 452 Overlake Dr. E. 98004

Linda Wickersham, Edmonds 9730 216th Pl. 98020

James T. Wiley, Seattle 12561 9th N.W. 98177

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1st Congressional District - MONDALE p

APPROVED LIST OF CANDIDATES FOR DELEGATES AND
ALTERNATES FOR THE DEMOCRATIC NATIONAL CONVENTION - 1984

People whose names do not appear on this list cannot
run for Delegate or Alternate

Robert L. Wittman, Bainbridge Island 8522 Meadowmeer Dr. 98110

Florence A. Wood, Seattle 100 W. Harrison Plaza North Tower, Suite 500 98119

Harrison Anthony Wood, Seattle 100 W. Harrison Plaza North Tower, Suite 500 98119

Theodore O. Wright, P.E., Kirkland 4421 102nd Lane N.E. 98033

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2nd Congressional District - MONDALE

APPROVED LIST OF CANDIDATES FOR DELEGATES AND ALTERNATES FOR THE DEMOCRATIC NATIONAL CONVENTION - 1984

People whose names do not appear on this list cannot run for Delegate or Alternate

Mike J. Alexander, Snohomish	6525 - 83rd Ave. S.E.	98290
Richard Austin, Clinton	2845 E. Sunlight Dr. N.	98236
Shirley Bennett, Coupeville	Box 491 508 S. Main St.	98239
Jean L. Berkey, Everett	2503 - 60th St.	98203
Dewey F. Brignone, Mount Vernon	1740 Anderson Rd.	98273
Carolyn A. Brown, Bellingham	320 - 32nd St. apt. 101	98225
Maurice L. Bryan, Jr., Bellingham	505 N. Garden St. #3D	98225
Lois M. Clement, Bellingham	2812 Martin St.	98226
James W. Davis, Bellingham	414 Fieldston Road	98225
Joseph B. DeLaCruz, Taholah	Box 189	98587
Pat Finn, Mt. Vernon	Local 44 AFL-CIO Box 207 330 Pacific Place	98273
Raymond Gonzales, Hadlock	Box 328	98339
George E. Grier, Port Angeles	1629 W. 7th	98362
Glenn Harvey, Marysville	6011 - 86th St. N.E.	98270
Dorothy Hester, Everett	5520 - 67 Dr. S.E.	98205
Patricia Hite, Marysville	10523 - 56th Ave. N.E.	98270
Grace M. Hubbard, La Conner	Box 157	98257
Vernon Huffman, Langley	5051 Hodges Ave.	98260
Violet Johnson, Everett	728 - 79th Ave. S.E.	98205
Mary-Francis Jones, Everett	5024 Delaware ave.	98203
Mary Jo Koenemann, Langley	Box 188	98260
Rita Matheny, Marysville	1322 ash St.	98270
Dr. Charles Moon, Snohomish	13201 Old Snohomish-Monroe Highway	98290
Walter T. Oldham, Bellingham	1807 "F" St.	?
Margaret L. Roberts, Port Angeles	1212 W. 4th St.	98362

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2nd Congressional District - MONDALE p

APPROVED LIST OF CANDIDATES FOR DELEGATES AND
ALTERNATES FOR THE DEMOCRATIC NATIONAL CONVENTION - 1984

People whose names do not appear on this list cannot run for Delegate or Alternate

Stanley Roth, Snohomish	5302 - 171 St. E. Ave.	98290
Aivars T. Silins, Bellingham	2701 Sylvan St.	98226
Harriet A. Spanel, Bellingham	901 Liberty St.	98225
Arthur C. Sprenkle, M.D., Everett	3802 Colby	98201
Guy Thomas, Everett	Box 243	98206
Donna Thompson, Snohomish	14007 Kenwanda Dr.	98290
Georgie Ann Weatherby, Bellingham	2809 Azalea Place	98225

8504050479 2

3rd Congressional District - MONDALE

APPROVED LIST OF CANDIDATES FOR DELEGATES AND ALTERNATES FOR THE DEMOCRATIC NATIONAL CONVENTION - 1984

People whose names do not appear on this list cannot run for Delegate or Alternate

Edward L. Barnes, Vancouver 4009 N.E. 50th ave. 98661
Tom G. Best, Tumwater 411 W. Lee #7-3 98501
Marie J. Brillante, Olympia P.O. Box 182, zip 98507
Mark O. Brown, Lacey 3414 Ruddell Loop S.E. 98503
Susan L. Butsch, Vancouver 2801 S.E. Blairmont 98664
Alexander Coleman, Lacey 6505 Sierra Dr. S.E. 98503
Ed Cote, Vancouver 406 N.W. 49th St. 98663
Judy Goodman, Olympia 1711 Camden Park Dr. S.W. 98502
Jon W. Halvorson, Lacey 5016 Sheridan Dr. S.E. 98503
Les Hayes, Vancouver 407 N.E. 52nd St. 98661
Helen S. Kirschling, Oakville 53 Housanut Rd. 98508
Larry Kolano, Longview 1325 - 19th ave. 98632
Leon Lead, Raymond 919 Duryea 98577
Linda Lombard, Olympia 5045 Indian Road N.E. 98506
Kathleen Manning, Olympia 116 E. 19th 98501
George Masten, Tumwater 1107 Harrison Ave. N.W. 98502
Wanda Riley, Olympia 7417 Lakeside S.W. 98502
Patricia Stepp, Ariel 11112 Lewis River Rd. 98603
Fred L. Waggoner, Vancouver 11312 N.E. 10th ave. 98665
Harry Walden, Olympia 1028 S. Frederick St. 98501

8504050472

4th Congressional District - MONDALE

APPROVED LIST OF CANDIDATES FOR DELEGATES AND
ALTERNATES FOR THE DEMOCRATIC NATIONAL CONVENTION - 1984

People whose names do not appear on this list cannot run for Delegate or Alternate

Christenia L. Alden, Kennewick 1111 So. Isby St. 99337

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Darlene A. Dowdy, Moxee City P.O. Box 663 98936

Theron F. Drake, Brewster P.O. Box 33 98812

Charles E. Fields, Yakima 211 Oak Ave. 98901

Tammy J. Firgen, Yakima 232 Ridgeway Dr. 98901

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Dorothy E. Gustafson, Richland 711 Sanford 99352

Robert Lyle Johnson, Yakima 3408 Barge 98902

Harlen L. Jones, White Salmon P.O. Box 1521 98672

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Michael R. Mallinger, Yakima 205 So. 69th Ave 98908

Dan Martinez, Union Gap 1913 So. 17th St. 98903

Dennis Martinez, Pasco 908 So. 4th Lane 99301

Polly Martinez, Union Gap 1913 So. 17th St. 98903

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Mary Ann Nichols, Ephrata 411 Patrick Rd. 98823

~~Patricia Peterson, Okanogan~~

Ray Pflueger, Pasco 515 W. Clark St. P.O. Box 2545 99302

Dale W. Sheets, Marlin Rural Route HC 34 P.O. Box 77 98832

Naomi Sherer, Richland 407 Abbot St. 99352

Mary Jane Skelton, Pasco Rt 1 Box 100 99301

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APPROVED LIST OF CANDIDATES FOR DELEGATES AND
ALTERNATES FOR THE DEMOCRATIC NATIONAL CONVENTION - 1984

People whose names do not appear on this list cannot run for Delegate or Alternate

Mary Ellen M. Smith, Moses Lake 830 So. Fairbanks Dr. 98337

Edelmiro Tamez, Jr., Pasco 1724 N. 17th 99301

Mabel B. Thompson, Ephrata 19 F. St. NW. 98823

Mary K. Williams, Yakima 302 N. 58th Ave. 98908

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5th Congressional District - MONDALE

APPROVED LIST OF CANDIDATES FOR DELEGATES AND ALTERNATES FOR THE DEMOCRATIC NATIONAL CONVENTION - 1984

People whose names do not appear on this list cannot run for Delegate or Alternate

John Atkinson, Spokane	E. 1604 Dalke	99207
Kenneth D. Bell, Jr., Spokane	W. 106 Nora	99205
Dorothy J. Burns, Spokane	E. 703 Euclid Ave.	99207
Timmie Coon, Mead	E. 3804 Zeus	99021
Tim E. Davis, Spokane	N. 2512 Morton	99207
Dorothy Eaton Ferguson, Spokane	W. 1215 Cherrywood Court	99218
Howard Flynn, Spokane	812 E. Nora	99207
Sean Harrigan, Spokane	E. 11112 - 31st	99206
Cathy L. Harris, Spokane	E. 308 Bridgeport	99207
Dale Harris, Spokane	E. 13416 Daltese Road	99216
Howard Jorgenson, Medical Lake	Box 1024	99022
Elizabeth J. Keeler, Spokane	E. 12524 - 20th	99216
Albert O. Karfft, Spokane	KRAFFT E. 717 - 32nd. Ave.	99203
John Leinen, Spokane	E. 102 Boone Ave.	99202
Randal E. Lorello, Mead	N. 13613 Regal Ct.	99021
James A. Millsap, Spokane	So. 1811 Royal	99204
Michael C. Quiggle, Medical Lake	Box 1409	99022
Jeanne Ratliff, Spokane	218 West 22	99203
Shirley Rector, Spokane	E. 13222 Farwell Rd.	99207
Allen D. Roberts, Spokane	W. 325 - 19th Ave.	99203
Doric Roberts, Spokane	N. 1904 Nelson	99207
Barbara L. Schultz, Spokane	N. 516 Ella Road	99206
Lydia T. Sims, Spokane	E. 1218 5th ave.	99202
Gene Spooner, Cheney	Rt. 3, Box 260	99004
Ruth Tannenbaum, Spokane	N. 2423 MORTON	99207

8504050479

APPROVED LIST OF CANDIDATES FOR DELEGATES AND
ALTERNATES FOR THE DEMOCRATIC NATIONAL CONVENTION - 1984

People whose names do not appear on this list cannot run for Delegate or Alternate

Vivien Tyner, Spokane E. 11021 - 19th 99206
Ya-Yue J. Van, Pullman N.E. 1630 Lower Drive 99163
Jack A. Waller, Deer Park Rt. 1, Box 281 99006
Michael J. Wright, Spokane 5916 S. MORAN Drive 99203
Don C. Zachary, Spokane South 516 UNION Road 99206

8504050479

6th Congressional District - MONDALE

APPROVED LIST OF CANDIDATES FOR DELEGATES AND
ALTERNATES FOR THE DEMOCRATIC NATIONAL CONVENTION - 1984

People whose names do not appear on this list cannot
run for Delegate or Alternate

William H. Baarsma, Tacoma 3709 No. Madison 98407

Teresa Bergeson, Federal Way 33434 8th Ave So. 98003

George Blood, Tacoma 3838 No. Whitman St. 98407

Harvey Brooks, Tacoma 9308 Mountain Ash Circle W. 98467

Terry L. Brossett, Tacoma 1501 N. Washington 98406

D. Crobet Clark, Tacoma 3414 N. 24th 98406

Larry Dahl, Tacoma 3001 So. D. St. 98402

Eleanor E. Dionne, Tacoma 908 N. Jurnett St. 98406

Rosa Gourdine-Franklin, Tacoma 7827 So. Austin St. 98408

Charles Griffin, Tacoma 11213 107th St. 98498

Ruth McElliott, Tacoma 906 E. 34th 98404

Don McGavick, Tacoma Old City Hall, 625 Commerce St. 98402

Paul J. Orheim, Puyallup 3108 25th Ave Ct. SE. 98373

Martin Ottesen, Tacoma 3619 67th Ave W. 98466

Carolyn Powers, Port Orchard 825 Ada St. 98366

Phyllis Rushforth, Tacoma 6101 Agnes Rd. N.E. 98422

Fredric C. Tausend, Gig Harbor 6023 Reid Dr. N.W. 98335

Albert R. Williams, Tacoma 4826 So. 18th 98405

Charlie L. Williams, Tacoma 4220 Grandview Dr. W. 98466

Dorothy L. Woodard, Tacoma 2615 E. 40th St. 98404

Gerald J. Woodward, Tacoma 2615 E. 40th St. 98404

Elizabeth J. Zubitis, Spanaway P.O. Box 95 98387

8504004726

8th Congressional District - MONDALE

APPROVED LIST OF CANDIDATES FOR DELEGATES AND ALTERNATES FOR THE DEMOCRATIC NATIONAL CONVENTION - 1984

People whose names do not appear on this list cannot run for Delegate or Alternate

Tina Aguilar, Sumner 4206 H. Tapps Dr. E. 98390

John Brownell, Seattle 20020 3rd Ave. S.

Frank Chopp, Kent 24425 116th S.E.

Ken Colestock, Redmond 9809 171st Ave N.E. 98052

Ivan Dexter, Kent 5527 Airport Way So. 98108

Cristy Ellingson, Black Diamond 31108 3rd Ave Sp. 62 98010

Robert B. Ellis, Puyallup 12511 146th St. E. 98373

Michael J. Elwin, Bellevue 828 165th Ave. N.E 98008

John W. Friedmann, Mercer Island 4541 89th Ave S.E 98040

C.F. Haugh, Auburn 5101 55th St S.E. 98002

Marilyn A. Hertz, Bellevue 14052 S.E. 8th St. 98007

Ted Higley, Federal Way 127 So. 294th Pl. 98003

D.J. Hofer, Mercer Island 8534 S.E. 79th Pl. 98040

Maxine Hornfelt, Kent 13110 S.E. 258th 98031

John R. House, Auburn 31660 Thomas Rd. So. 98002

Janice Janosz, 2220 O St. N.E. #B, Auburn 98002

Katie Johnson, Spanaway Rt 2 Box 2465 98387

Carolee D. Johnstone, Renton 18101 S.E. 136th St. 98052

Dorothy J. Jones, Renton 17522 157 S.E. 98055

Henry Kelley, Auburn 18318 S.E. 354th 98002

Lillian Kildell, 4th N.E., Auburn

Dorothy King, Issaquah P.O. Box 964 98027

O. C. Koshy, Glacier Key, Bellevue 5 Glacier Key 98052

Annette H. Loy, Sumner 4229 Lakeridge Dr. E. 98390

Thomas J. Lynch, Auburn 6107 So. 294th 98001

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8th Congressional District - MONDALE p

APPROVED LIST OF CANDIDATES FOR DELEGATES AND
ALTERNATES FOR THE DEMOCRATIC NATIONAL CONVENTION - 1984

People whose names do not appear on this list cannot run for Delegate or Alternate

Paul J. Mallary, Algona 207 2nd Ave. N. 98002
Gerald A. Marsh, Renton 272 Lake Desire Dr. N. 98055
Sharon Mast, Bellevue 4908 136th Pl. S.E. 98006
Edmund P. McCarthy, Renton
Dona McPhillips, Graham 15306 204th St. E. 98338
Betty Means, Bellevue 1201 96th S.E. 98004
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Margot Jenkins, 1011 Redfield St, La Crosse 54601
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Gerald Jensen, 206 Elm Dr, Stoddard 54658
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Angeline Johnson, 2410 Bongey Dr, #4, Menomonie 54751
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Susan C Jurgens, 815 Monroe St, Onalaska 54650
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Ralph Jurjens Jr, 815 Monroe, Onalaska 54650
(608) 783-0973

Edward Koelbl, 131 S. 23rd St, La Crosse 54601
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CANDIDATES (SUCCESSFUL & UNSUCCESSFUL) COMMITTED TO MONDALE

July 9, 1984

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Jacqueline Glasshof, 315 1/2 Summit Ave, Eau Claire 54701
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June Goethel, 316 7th Ave, East, Durand 54736
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(715) 839-7579

Monica Granberg, 604 Summer St, Eau Claire 54701
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Greenie L Jackson, 501 E. Miller, Greenwood 54437
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Isla M Janett, 205 N. 2nd, Alma 54610
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CANDIDATES (SUCCESSFUL & UNSUCCESSFUL) PLEDGED TO MONDALE

July 9, 1984

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Ronald Wisnicky, Rt #1, Kewaunee 54216
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Joan Zacharias, 20279 W. Good Hope Rd, Lannon 53046
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Joseph Zember, W317 N882 Clover Park, Delafield 53018
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Manton W Zernicke, Rt #1, Pulaski 54162
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Janis Zommers, 6709 Glacier Dr, West Bend 53095
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James L Zwick, 556 Spinnaker Lane, Green Bay 54302
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CANDIDATES (SUCCESSFUL & UNSUCCESSFUL) PLEDGED TO MONDALE

July 9, 1984

Theresa H. Tryan, 829 Parnell St, Marinette 54143
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John P Voegtli, 434 Cook St, DePere 54115
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Chris Wachlin, 5514 N. Ballard Rd, Appleton 54915
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William L Wells, 2425 Maple Hill Ln, Brookfield 53005
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Robert K. Williams, 195 Agua View Dr, Cedarburg 53012
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CANDIDATES (SUCCESSFUL & UNSUCCESSFUL) COMMITTED TO MONDALE

July 9, 1984

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Richard D Coy, 125 Marston Ave, Eau Claire 54701
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Clarence Crum, 106 N. 1st, Arcadia 54612

Philip C Curti, 127 S. 23rd St, La Crosse 54601
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Donald A Dickmann, 815 11th St, Menomonie 54751
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Greg Elliott, 217 E. Elm, River Falls 54022
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Gonia Elmeda, Rt #1, Box 55, CTY "B", West Salem 54669
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Gary Everson, Rt #2, Whitehall 54773

Roman Feltes, 714 E. Wilson, Arcadia 54612

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CANDIDATES (SUCCESSFUL [redacted]NSUCCESSFUL) COMMITTED T[redacted]ONDALE

July 9, 1984

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Jan Place, Rt #2, Box 383, Ellsworth 54011
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Mary Postle, 34 S. 6th, Barron 54812
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Richard H. Rettke, 1524 Fence, Rice Lake 54868
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CANDIDATES (SUCCESSFUL UNSUCCESSFUL) COMMITTED TO MONDALE

July 9, 1984

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Rose Mary Richter, 77 Coulee Rd #101, Hudson 54016
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Gerald Roethel, Rt #3, Box 252, Westby
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John J Ruemmele, Rt #1,, Roberts 54023
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Lawrence Samlaska, 1925 Fuller Ave79, Cumberland 53829
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Rachel V Shay, Box 198, Star Prairie 54026
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William L Shay Sr, Box 198, Star Prairie 54026
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Larry Stephenson, Box 15, Seneca 54654
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Harvey Stower, 515 S. Keller Ave, Amery 54001
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CANDIDATES (SUCCESSFUL & UNSUCCESSFUL) COMMITTED TO MONDALE

July 9, 1984

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Jim Svitavsky, 101 Wnetz Hill, La Crosse 54601
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Roger Tlusty, 1417 Rust St, Eau Claire 54701
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Maria Wenzel, 1517 1/2 Denton, La Crosse 54601
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Robert West, 11 Noble, Rice Lake 54868
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Douglas Williams, Rt #3, Box 810, St. Croix Falls 54024
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Ernest C Williams, 415 Newton St, Eau Claire 54701
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CANDIDATES (SUCCESSFUL & UNSUCCESSFUL) PLEDGED TO MONROE

July 9, 1984

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Leo Simon, 1331 Bellevue Rd, Green Bay 54302
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MariLee Sischo, 2719 N. 12th St, Sheboygan 53081
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Nancy E Sivertsen--W/DRAWN, 1401 S. Driscoll St #204, Appleton 54914
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Nancy M Skadden--WITHDRAWN, 9240 Lime Kiln Rd, Sturgeon Bay 54235
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Carol Smart--WITHDRAWN, 659 Hwy 45 South, Eagle River
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Marcheta Steebs, Rt #1, Sister Bay 54234
(414) 854-2956

Ronald Sternat, 234 N. Clark St, Mayville 53050
(414) 387-5478

Carmen Stout, 820 N. Appleton St, Appleton 54911
(414) 733-6828

Katherine Stout, 820 N. Appleton St, Appleton 54911
(414) 733-6868

Wendy Strauch-Nelson, 910 Manchester Ct, Hartland 53029
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Janice Swoboda, Rt #1, Luxemburg 54217
(414) 845-2295

Anna Szilagyi, Rt #6, #137, Spencer, Appleton 54915
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Karen Toshner, 3500 W. Parkridge Ave, Appleton 54914
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Ronald Toshner, 3500 W. Parkridge, Appleton 54914
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Keith L. Tourtillott, Box 98, Neopit 54150
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William Trarbach--WITHDRAWN, 6523 County "J", Freedom 54131
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Lois Trever, Box 25, Mountain
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CANDIDATES (SUCCESSFUL & UNSUCCESSFUL) PLEDGED TO MONDALE

July 9, 1984

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Mary K Roberts, 919 Gail Place, Ft. Atkinson 53538
(414) 563-5343

William M Roberts, 919 Gail Place, Ft. Atkinson 53538
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Sylvia Roeder, Rt #1, Box 113-B, Watertown 53094
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Joan Rudnitski, 6008 Artist Bay Rd, West Bend 53095
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Jean Shaw, Rt #, Box 201, Lake Mills 53551
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CANDIDATES (SUCCESSFUL & UNSUCCESSFUL) PLEDGED TO MONROE

July 9, 1984

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Michael Pelletier, 170 S. Ellis Ave, Peshtigo 54157
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James Pragatz, 1819 N. 10th St, Sheboygan 53081
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(715) 356-2558

Steve Pruhl, Box 681, Woodruff 54568
(715) 356-2558

Michael B. Ptacek, 819 Cole St, Watertown 53094
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Sandra Rammer, 1924 N. Edgewood Ave, Appleton 54914
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CANDIDATES (SUCCESSFUL & UNSUCCESSFUL) PLEDGED TO MONDALE

July 9, 1984

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Barbara Mathy, 739 Dawes St, Marinette 54143

Helen McEathron, 214 Buchanan, Mayville 53050
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Richard C Myrhum, 235 Hazel Lane, Hartland 53029
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Paul S Nagan, 816 Desnoyer St, Kaukauna 54130
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Bonny Nelson, 628 George, Oconomowoc 53066
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Philip Oostdyk, 3729 Koehler Dr, Sheboygan 53081
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CANDIDATES (SUCCESSFUL & UNSUCCESSFUL) PLEDGED TO MONROE

July 9, 1984

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Mary E Laux, 303 S Walnut, Appleton 54911
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Robert LaVenture Jr, 3199 N. Summit Center Dr, Oconomowoc 53066
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Earl Lepp, 2131 W. Lilac Lane, Mequon 53092
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Shirley Loebel, 2340 Kevenauer Dr, Brookfield 53005
(414) 782-3674

CANDIDATES (SUCCESSFUL & UNSUCCESSFUL) PLEDGED TO MONDALE

July 9, 1984

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Helen M Isferding, 2323 N. 29th St, Sheboygan 53081
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Margaret Jacobson, 229 N. Walnut St, Oconomowoc 53066
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Dennis Johnson, 1604 5th St, Marinette 54143
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Georgia C Johnson, 2041 9th St, Marinette 54143
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Judith Johnson, Rt #3, Box 249, Shore Dr, Marinette 54143
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Jack Jollevoet, 1310 Coolidge Ave, Little Chute 54140
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Darlene Kaicz, Rt #1, Box 165, Pulaski 54162
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Lawrence S. Katz, 4647 N. Lake Dr, Whitefish Bay 53211
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Gregory Kirschling, 1133 E. Walnut St., # H, Green Bay 54301
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Shirley A. Klas, 7236 Luxemburger Lane, Random Lake 53075
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Ralph W Koenig, 660 Wilson Dr, Brookfield 53005
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Gerald Koester, 420 George St, Green Bay 54302
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Larri L Konkel, 5330 N. 47th St, Milwaukee 53218
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Raymond E Krek, 3235 Whitewater Ave, Jefferson 53549
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Audrey E. Kreuser, W186 N6997 Marcy Rd, Menomonee Falls 53051
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CANDIDATES (SUCCESSFUL & UNSUCCESSFUL) PLEDGED TO MONDALE

July 9, 1984

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Frances Gerber, 858 Lincoln St, Seymour
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Dorothy Gerue, 2321 Balsam Way, Green Bay 54304
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Lawrence Gerue, 2321 Balsam Way, Green Bay 54303
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Mary M Goulding, 1503 Carroll Ave, Green Bay 54304
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Cynthia Gross, 224 S. Andrews, Shawano 54166
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Marjorie M Gutschenriter, 1919 N. 19th St, Sheboygan 53081
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Dolores Hayon, 2826 Michigan Ave, Sheboygan 53081
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John R. Hayon, 2826 Michigan Ave, Sheboygan 53081
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Martha K Hemwall, 126 S. Alton Ct, Appleton 54911
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Frank Hiber, 836 S. Main St, Saukville 53080
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Rosemary Hinkfeuss, 1002 S. Monroe, Green Bay 54301
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D. Jeffrey Hirschberg, 280 W. Nokomis Ct, Fox Point 53217
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Gene A. Holt, 12424 W. Fairmount, Butler 53007
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CANDIDATES (SUCCESSFUL & UNSUCCESSFUL) PLEDGED TO MONDALE

July 9, 1984

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July 9, 1984

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Isabel Donahue, 601 S. Washington St, Janesville 53545
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July 9, 1984

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CANDIDATES (SUCCESSFUL & UNSUCCESSFUL) COMMITTED TO MONDALE

July 9, 1984

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July 9, 1984

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July 9, 1984

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July 9, 1984

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CANDIDATES (SUCCESSFUL & UNSUCCESSFUL) COMMITTED TO MONDALE

July 9, 1984

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July 9, 1984

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CANDIDATES (SUCCESSFUL & UNSUCCESSFUL) COMMITTED TO MONDALE

July 9, 1984

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Christopher L. Nelson, 2425 S. 82d St., West Allis 53219
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(414) 542-4767

Shirley A. Nyman, 3873 S. 5th Pl., Milwaukee 53207
(414) 483-7649

CANDIDATES (SUCCESSFUL UNSUCCESSFUL) COMMITTED MONDALE

July 9, 1984

J E O'Connell, S90 W22950 Rose Ave, Big Bend 53103
(414) 662-2053

Jose A Olivieri, 3711 S. 104th St, Greenfield 53228
(414) 543-6993

Marie Parker, 4514 W. Midland Dr, Milwaukee 53219
(414) 327-2596

Thomas Parker, 4514 W. Midland Dr, Milwaukee 53219

John Parr, 6020 S. 25th St., Milwaukee 53221
(414) 282-7414

Ervin W Pelkowski, 3112 S. 9th Place, Milwaukee 53215
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Janet K. Pelland, 4401 S. 5th Pl., Milwaukee 53207
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Richard Pellowski, 6627 S. 19th St, Milwaukee 53221
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Mildred M. Perry, 7744 S. North Cape Rd., Franklin 53132
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Michael J. Piontek, 1828 W. Salem, Milwaukee 53221
(414) 761-2885

Ruth Pohl, 22599 W. Lawnsdale Rd, Waukesha 53186
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Mary Presser, 1601 Marion Ave, Milwaukee 53172
(414) 762-8299

Richard A. Presser, 1601 Marion Ave., South Milwaukee 53172
(414) 762-8299

Victor S Preuss, 13524 W. Prospect Pl, New Berlin 53151
(414) 782-6076

Janet Protasiewicz, 3334 S. Princeton Ave., Milwaukee 53215
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Mary M. Rappel, 2560 S. 28th St., Milwaukee 53215
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Henry Rios, 920 S. 32d St, Milwaukee 53215
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Thomas V Roelke, 10025 W. Edgerton, Hales Corners 53130
(414) 425-8596

Gladys Roszak--WITHDRAWN, 2455 S. 29th St., Milwaukee 53215
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CANDIDATES (SUCCESSFUL UNSUCCESSFUL) COMMITTED MONDALE

July 9, 1984

Jean Rutkowski, 11335 W. Woodside, Hales Corners 53130
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Kenneth Sajdak, 717 N. Hartwell, Waukesha 414
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Joseph Sardina, 3628 S. 97th St, Milwaukee 53228
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John R Schuette, 7824 W. Howard, Milwaukee 53222
(414) 327-0637

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Waldemar Schultz, 1968 S. 72d St., West Allis 53219

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Gregory G Shaw, 1447 S. 71st St, West Allis 53214
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Dennis T Sheahan, 6416-A W. Oconto Pl, West Allis 53219
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Estelle Siech, 8946 W. Burdick, Milwaukee 53227
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Eugene Siech, 8946 W. Burdick, Milwaukee 53227
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Walter A Snieg, 3337 S. 76th St #5, Milwaukee 53219
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Rose Marie Staats, 1377 s 90th St, West Allis 53214
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Elizabeth E. Stephens, 2037 S. 14th St., Milwaukee 53204
(414) 383-3543

Robert Stock, 419 S. 89th St, Milwaukee 53214
(414) 453-2872

Sherman E Stock, 11229 Bridget La, Hales Corners 53130
(414) 425-3494

Marlene Stolpa, 1004 Rawson Ave #16, S. Milwaukee 53172
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CANDIDATES (SUCCESSFUL ● UNSUCCESSFUL) COMMITTED ● MONDALE

July 9, 1984

Josephine R Suter, 2450 S. 70th St, West Allis 53219
(414) 541-6654

Thomas J Suter, 2450 S. 70th St, West Allis 53219
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Barbara Svetlik, 1314 S. 14th St., Milwaukee 53204
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Eugene Thate, 3937 S. 1st Pl., Milwaukee 53207
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Susan Thierfelder, 7859 Scepter Dr, South #31, Franklin 53132
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Duane Troyer, 8914 S. 11th Ave, Oak Creek 53154
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Anton M Ujcich, 2121 S. 67th Place, West Allis 53219
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Frances M Ujcich, 2121 S. 67th Pl, West Allis 53219
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Amodeo Valenti--WITHDRAWN, 3475 S. 119th St, West Allisst 53227
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Obert J Vattendahl, 1723 Cherry St, S. Milwaukee 53172
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Hope C. Vermaas--WITHDRAWN, 1436-A Big Bend Rd, Waukesha 53186
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CANDIDATES (SUCCESSFUL ● UNSUCCESSFUL) COMMITTED T● MONDALE

July 9, 1984

Dewain L. West, 1555 S. Union St., Milwaukee 53204
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Mary A. West, 1555 S. Union St., Milwaukee 53204
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Joan Agnew Williams, 4267 S. 70th St, Greenfield 53220
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Aurelia Yeko, 3034-A S. 15th St., Milwaukee 53215
(414) 384-1109

George Zerba, 1543 S. 15th Pl., Milwaukee 53204
(414) 383-2993

Eric G Ziert, 3409 S. Wollmer Rd, West Allis 53227
(414) 546-1625

Regina Zych, 1438 W. Oklahoma Ave, Milwaukee 53215
(414) 384-7911

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CANDIDATES (SUCCESSFUL & UNSUCCESSFUL) PLEDGED TO MONDALE

July 9, 1984

Mary S Willis, Box 579, Eagle River 54521
(715) 479-7330

Ronald Wisnicky, Rt #1, Kewaunee 54216
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Joan Zacharias, 20279 W. Good Hope Rd, Lannon 53046
(414) 255-5054

Joseph Zember, W317 N882 Clover Park, Delafield 53018
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Manton W Zernicke, Rt #1, Pulaski 54162
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Janis Zommers, 6709 Glacier Dr, West Bend 53095
(414) 629-9391

James L Zwick, 556 Spinnaker Lane, Green Bay 54302
(414) 468-8050

CANDIDATES (SUCCESSFUL & UNSUCCESSFUL) PLEDGED TO MONDALE

July 9, 1984

Theresa H. Tryan, 829 Parnell St, Marinette 54143
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Frances Urban, Rt #1, Box 57-J, Mukwonago 53149
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George R. Urban, Rt #1, Box 57-J, Mukwonago 53149
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William E. Van Pembrook, 1280 River St, Niagara 54151
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Jerry Voechting, 2917 N. 11th St, Sheboygan 53081
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Faith Voechting-W/DRAWN, 1625 Heller Ave, Sheboygan 53081
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(414) 336-7021

John P Voegtli, 434 Cook St, DePere 54115
(414) 336-7021

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William L Wells, 2425 Maple Hill Ln, Brookfield 53005
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(414) 567-4988

Joyce Williams, 195 Aqua View, Cedarburg 53012
(414) 377-9361

Robert K. Williams, 195 Agua View Dr, Cedarburg 53012
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CANDIDATES (SUCCESSFUL [redacted] UNSUCCESSFUL) COMMITTED T[redacted]MONDALE.

July 9, 1984

William Cahow, Box 325, Clear Lake 54005
(715) 263-2782

Rita Chandler, 1727 Liberty, La Crosse 54603
(608) 781-6366

Therusa Clements, Rt #2, Bangor 54614
(608) 486-2109

Jean Conley, 1275 Davis St, Hammond 54015
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Luanne K Coy, 125 Marston Ave, Eau Claire 54701
(715) 832-0603

Richard D Coy, 125 Marston Ave, Eau Claire 54701
(715) 832-3603

Clarence Crum, 106 N. 1st, Arcadia 54612

Philip C Curti, 127 S. 23rd St, La Crosse 54601
(608) 782-8992

Donald A Dickmann, 815 11th St, Menomonie 54751
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Joyce Eastman, 628 Pine, Box 179, Hillsboro 54634
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Greg Elliott, 217 E. Elm, River Falls 54022
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Gonia Elmeda, Rt #1, Box 55, CTY "B", West Salem 54669
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Virginia Erickson, 3434 East Ave, La Crosse 54601
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Gary Everson, Rt #2, Whitehall 54773

Roman Feltes, 714 E. Wilson, Arcadia 54612

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Thomas G Gerber Sr, 3341 Blakeley Ave, Eau Claire 54701
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Virginia German, Box 54, Black River Falls 54615
(715) 284-4969

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CANDIDATES (SUCCESSFUL [redacted]NSUCCESSFUL) COMMITTED T[redacted]ONDALE

July 9, 1984

Margot Jenkins, 1011 Redfield St, La Crosse 54601
(608) 782-2061

Gerald Jensen, 206 Elm Dr, Stoddard 54658
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Angeline Johnson, 2410 Bongey Dr, #4, Menomonie 54751
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(608) 783-

Ralph Jurjens Jr, 815 Monroe, Onalaska 54650
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Ivadell Letch, Box 305, Centuria 54824
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Marjorie Newville--WITHDRAWN, 409 S. 5th St, Barron 54812
(715) 537-5531

CANDIDATES (SUCCESSFUL & UNSUCCESSFUL) COMMITTED TO MONDALE

July 9, 1984

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Maureen O'Brien, 1427 Highland Ave, Eau Claire 54701
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Delores Ohner, Rt #2, Box 586, Galesville 54630

Edith Olson, 20 E. Freeman, Rice Lake 54868
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Marvin C Olson--WITHDRAWN, 20 E. Freeman St, Rice Lake 54868
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Richard Palmer, Rt #2, Box 57-A, Hixton 54635
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Betty J Passon, 2244 Hayden Ave, Altoona 54720
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Shirley Paulson, 692 Park View Dr, New Richmond 54017
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John P Peter, Rt #1, Box 66, Rice Lake
(715) 234-2518

Jan Place, Rt #2, Box 383, Ellsworth 54011
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Delmar W Plank, Rt #1, Box 50, Alma 54610
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Mary Jane Pollock, 218 S. 8th St, River Falls 54022
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Becky Post, 320 N. 9th St, La Crosse 54601
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Mary Postle, 34 S. 6th, Barron 54812
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Richard H. Rettke, 1524 Fence, Rice Lake 54868
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Robert W Richgels--WITHDRAWN, 3401 Birch St, La Crosse 54601
(608) 788-7307

CANDIDATES (SUCCESSFUL & UNSUCCESSFUL) COMMITTED TO MONDALE

July 9, 1984

John Richter, Box 3, Woodville 54028
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Rose Mary Richter, 77 Coulee Rd #101, Hudson 54016
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Harold C Ristow, 3004 Green Bay St, La Crosse 54601
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Gerald Roethel, Rt #3, Box 252, Westby
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Richard P Rousey, Box 55, Alma Center 54611
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John J Ruemmele, Rt #1,, Roberts 54023
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Lawrence Samlaska, 1925 Fuller Ave79, Cumberland 53829
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Shirley Schirz, 1860 Lincoln Ave, Fennimore 53809
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Betsy Semling, Rt #2, Box 290, Fountain City 54629
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Rachel V Shay, Box 198, Star Prairie 54026
(715) 248-3010

William L Shay Sr, Box 198, Star Prairie 54026
(715) 248-3010

Richard Shoemaker-W/DRAWN, 207 3rd St., West, Menomonie 54751
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Elvira Sigmund, Rt #1, Box 361-I, Hager City 54014
(715) 792-2336

Brent Smith, 215 Locust St, Onalaska 54650
(608) 783-4892

David N Smith, Rt #2, Box 68, Neillsville 54456
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Roger Spindler, Box 167, Bay City 54723
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Joan Stephenson, Box 15, Seneca 54654
(608) 734-3588

Larry Stephenson, Box 15, Seneca 54654
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Harvey Stower, 515 S. Keller Ave, Amery 54001
(715) 268-6740

CANDIDATES (SUCCESSFUL UNSUCCESSFUL) COMMITTED TO MONDALE

July 9, 1984

Jim Sultavsky, 101 Wentz Hall (UW-LC), La Crosse 54601
(608) 782-3982

Kathleen Sullivan, 1404 Ferry, La Crosse 54601
(608) 784-2343

Jim Svitavsky, 101 Wnetz Hill, La Crosse 54601
(608) 782-3982

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Mary L Tlusty, 1417 Rust Stt, Eau Claire 54701
(715) 835-0836

Roger Tlusty, 1417 Rust St, Eau Claire 54701
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Kermit N Veum, Rt #2,, Westby 54667
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Roger J Voss, 2717 Del Ray, La Crosse 54601
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Maria Wenzel, 1517 1/2 Denton, La Crosse 54601
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Karen West, 11 Nobel, Bice Lake 54868
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Robert West, 11 Noble, Rice Lake 54868
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CANDIDATES (SUCCESSFUL & UNSUCCESSFUL) PLEDGED TO MONDALE

July 9, 1984

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Ronald Sternat, 234 N. Clark St, Mayville 53050
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Carmen Stout, 820 N. Appleton St, Appleton 54911
(414) 733-6828

Katherine Stout, 820 N. Appleton St, Appleton 54911
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Wendy Strauch-Nelson, 910 Manchester Ct, Hartland 53029
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Anna Szilagyi, Rt #6, #137, Spencer, Appleton 54915
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Ronald Toshner, 3500 W. Parkridge, Appleton 54914
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Lois Trever, Box 25, Mountain
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CANDIDATES (SUCCESSFUL & UNSUCCESSFUL) PLEDGED TO MONDALE

July 9, 1984

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William M Roberts, 919 Gail Place, Ft. Atkinson 53538
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Alan C Sax, 426 S. Quincey, Green Bay 54302
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Charlotte Schall-Krokosky, Rt #2, Broadway Dr, Appleton 54915
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Sharon Schwalbach, 1314 W. El Rancho Dr., Mequon 53092
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Susan Schwartz, 426 S. Quincy St, #1, Green Bay 54301
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CANDIDATES (SUCCESSFUL & UNSUCCESSFUL) PLEDGED TO MONDALE

July 9, 1984

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Michael Pelletier, 170 S. Ellis Ave, Peshtigo 54157
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Rose Ann Peters, 4466 Maple Rd, West Bend 53095
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Steve Pruhl, Box 681, Woodruff 54568
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Michael B. Ptacek, 819 Cole St, Watertown 53094
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Sandra Rammer, 1924 N. Edgewood Ave, Appleton 54914
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Marie Reinke, Box 304, Pulaski 54162
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Marjorie Remsing--WITHDRAWN, 1901 Hillside Lane, Green Bay 54302
(414) 468-9496

CANDIDATES (SUCCESSFUL & UNSUCCESSFUL) PLEDGED TO MONDALE

July 9, 1984

Jane Marr, 425 Foster St, Ft. Atkinson 53538
(414) 563-5889

Barbara Mathy, 739 Dawes St, Marinette 54143

Helen McEathron, 214 Buchanan, Mayville 53050
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Rose McKenzie, 165 Winchester Ave, Green Bay 54302
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Rosemary Migas, Box 202, Elcho 54428
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Dorothy Mosgaller, 438 S. Hudson, Sturgeon Bay 54235
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Wesley Mulder, 209 Brookview Ave, Adell 53001
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Donald Murphy, 444 Kettle Moraine Dr, Eagel 53119
(414) 594-2888

Richard C Myrhum, 235 Hazel Lane, Hartland 53029
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Paul S Nagan, 816 Desnoyer St, Kaukauna 54130
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Bonny Nelson, 628 George, Oconomowoc 53066
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William O'Rourke, N115 W16705 Westminster Ct, Germantown 53022
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Lawrence Olson, 2467 Sun Valley Ct, Green Bay 54304
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Michael Onheiber, 441 College St, Lake Mills 53551
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Philip Oostdyk, 3729 Koehler Dr, Sheboygan 53081
(414) 458-2345

CANDIDATES (SUCCESSFUL & UNSUCCESSFUL) PLEDGED TO MONDALE

July 9, 1984

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Coralie Krueger, Rt #1, Denmark 54208
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Henry Krueger, Rt #1, Box 12, Denmark 54208
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Georgia Kucharek, 6216 N. Santa Monica Blvd, Whitefish Bay 53217
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Lawrence LaBrosse, Box 95, Krakow 54137
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Irene LaDu, Box 235, Laona 54541
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CANDIDATES (SUCCESSFUL & UNSUCCESSFUL) PLEDGED TO MONDALE

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July 9, 1984

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CANDIDATES (SUCCESSFUL & UNSUCCESSFUL) COMMITTED TO MONDALE

July 9, 1984

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James DeLorme, 509 Northport Dr #7, Madison 53704
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Isabel Donahue, 601 S. Washington St, Janesville 53545
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Frances Johnson, 5726 Castleton Dr, Racine 53406
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July 9, 1984

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John F Spring, 1234 Blake Ave, Racine 53404
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CANDIDATES (SUCCESSFUL & UNSUCCESSFUL) COMMITTED TO MONDALE

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Curt Wilson, 7525 28th Ave, Kenosha 53140
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CANDIDATES (SUCCESSFUL & UNSUCCESSFUL) COMMITTED TO MONDALE

July 9, 1984

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July 9, 1984

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(414) 542-5940

Donna Park Hill, 452 Richard St, Waukesha 53186
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Grace Jirikowic, 913 E. Dakota, Milwaukee 53207
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Ralph Jirikowic, 913 E. Dakota St, Milwaukee 53207
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Kenneth H Kaye, 6100 W. Stonehedge #240, Greenfield 53220
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Holly Kelly, S110 W20500 S. Denoon, Muskego 53150
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Thomas P Kelly, S110 W20500 S. Denoon, Muskego 53150
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Ruth E. Klewin, 4987 S. 24th St., Milwaukee 53221
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CANDIDATES (SUCCESSFUL & UNSUCCESSFUL) COMMITTED TO MONDALE

July 9, 1984

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(414) 762-0583

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Margaret Ann Krusick--WITHDRAWN, 3426 S. 69th St, Milwaukee 53219
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Edward J Kubicki, 6124 W. Eden Plac, Milwaukee
414-

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Richard G Laabs, 4010 S. Packard Ave, St. Francis 53207
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Gladys Lajsic, 2626 S. 96th St, West Allis 53227
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Dennis Latus, 8373 S. Sherwood Dr, Franklin 53132
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Kathleen Licht, 1339 S. 112th St, West Allis 53214
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July 9, 1984

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Harry Moczynski, 2132 S. 11th St., Milwaukee 53215
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CANDIDATES (SUCCESSFUL & UNSUCCESSFUL) COMMITTED TO MONDALE

July 9, 1984

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(414) 327-2596

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CANDIDATES (SUCCESSFUL & UNSUCCESSFUL) COMMITTED TO MONDALE

July 9, 1984

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CANDIDATES (SUCCESSFUL & UNSUCCESSFUL) COMMITTED TO MONDALE

July 9, 1984

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CANDIDATES (SUCCESSFUL & UNSUCCESSFUL) COMMITTED TO MONDALE

July 9, 1984

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Mary A. West, 1555 S. Union St., Milwaukee 53204
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Regina Zych, 1438 W. Oklahoma Ave, Milwaukee 53215
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3504050497

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Seafarers' International Union of North America
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Brooklyn, New York 11232

Bill Olwell
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Washington, D.C. 20006

8504050497

AFL-CIO State Federations

Arizona State AFL-CIO
President: William Yaeger

California Labor Federation, AFL-CIO
President: Albin J. Gruhn

Colorado AFL-CIO
President: Norman N. Pledger

Florida AFL-CIO
President: Daniel J. Miller

Idaho State AFL-CIO
President: Jim Kearns

Illinois State Federation of Labor and Congress of Industrial Organizations
President: Robert G. Gibson

Kansas State Federation of Labor, AFL-CIO
President: Tom Pierce

Kentucky State AFL-CIO
President: Joseph Warren

Maryland State and D.C. AFL-CIO
President: Thomas M. Bradley

Michigan State AFL-CIO
President: William C. Marshall

Missouri State Labor Council, AFL-CIO
President: James E. Meyers

Montana State AFL-CIO
President: Jerry Driscoll

New Hampshire State Labor Council, AFL-CIO
President: Harland Eaton

New York State AFL-CIO
President: Raymond R. Corbett

North Carolina State AFL-CIO
President: E. A. Britt

Ohio AFL-CIO
President: Milian Marsh

Pennsylvania AFL-CIO
President: Harry Boyer

3504975

Rhode Island AFL-CIO
President: Edward J. McElroy, Jr.

Texas State AFL-CIO
President: Harry Hubbard

Virginia State AFL-CIO
President: Julian F. Carper

Washington State Labor Council, AFL-CIO
President: Marvin L. Williams

West Virginia labor Federation, AFL-CIO
President: Joseph W. Powell

Wisconsin State AFL-CIO
President: John W. Schmitt

8504049777

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 11, 1984

MEMORANDUM TO: James Pehrkon
Deputy Staff Director
for Management

FROM: Charles N. Steele
General Counsel

THROUGH: John C. Surina
Staff Director

RE: Mondale for President Committee, Inc.
Tapes -- MUR 1667

Attached are four computer tapes and the tape record layouts that were provided by the Mondale for President Committee, Inc. in response to a Commission subpoena for documents issued in the above-captioned matter.

We are trying to complete the investigation into this matter in an expeditious manner. Consequently, we request that you review the tapes to determine whether they contain pertinent information and provide us with such information as soon as possible, preferably no later than the end of next week.

Attachments

3504050497 3

Mondale for President
2201 Wisconsin Avenue, N.W.
Washington, D.C. 20007
Telephone: 333-625-1000

MONDALE

GCC #4001

10 5:00

July 10, 1984

Tapes in docket

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

RE: MUR 1667

Dear Mr. Steele:

Enclosed are the in-house computer tapes requested by the Commission in document requests #17 and #18 of the FEC subpoena of May 23, 1984.

Sincerely,

Carolyn U. Oliphant

Carolyn U. Oliphant
Deputy General Counsel

3504049972

Paid for by Mondale for President, Inc.

8504050049 30

F. E C.
Charles N. Steele
General Counsel
1325 "K" St. NW

GCG#394

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

MONDALE

TAPES ARE IN DOCKET

July 6, 1984

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

Re: MUR 1667

Dear Mr. Steele,

Enclosed is the machine-readable material from our contractor, CDSI, requested by the Commission in document requests #17 and #18 of the FEC subpoena of May 23, 1984. The in-house computer tapes will be available next week. The Commission has requested that we provide these materials even though they contain information already within the FEC's possession. MPC has further advised the Commission that these materials are probably unusable by the Commission for the purposes sought. Nonetheless, upon request, MPC is providing them in order to cooperate fully with the Commission's investigation. Please advise us whether these materials are, in fact, usable by the Commission.

Sincerely,

Lyn Oliphant

Carolyn U. Oliphant
Deputy General Counsel

CUO/bjp

Paid for by Mondale for President, Inc.

3504049311

MEMORANDUM

TO: Christine Brewer, Mondale Presidential Committee

FROM: L. Leos, CDSI

DATE: July 5, 1984

SUBJECT: MPC Financial and Master file tapes

Enclosed are two tapes containing MPC's master files and detailed transactions from 100183 to 153184. Tape number 004848 contains the financial transactions. Its attributes are 1, SL 128/4224(LRECL/BLKSIZE). Tape number 006806 contains the master files. Its attributes are 1, SL 80/2000 (LRECL/BLKSIZE). To assist the FEC in reading these tapes, record layouts of each tape are attached.

3504050493?

Record Layout for Financial Transaction (Tape # 004848)

Record Position	Description
1-4	Record type and user I.D. (always TMPC)
5-6	Transaction code (TC) 60/69 - New/hold voucher 63 - Automated Cash Disbursement 64 - Manual Check 66 - Void Check 68 - Accomplished Draft
7-12	Transaction Date
13-18	TC60, 69 - voucher number TC63, 64, 66 - Check number TC68 - Bank statement date
19-33	Description
34-39	Vendor number
40-45	TC60, 69 - All zeroes TC63, 64, 66 - voucher number TC68 - Draft number
46-59	Account Number Pos. 46 - Fund type (always 0) Pos. 47 - Class Code (2 - expense) (3 - asset) Pos. 48-49 - For Class 2 - Cost center For Class 3 - 12 - operating cash account 13 - draft cash account Pos. 50 - BP function 1 - Operating Expenditures 2 - Exempt Fund raising 5 - Exempt Legal and accounting
51-52	Object code
53-54	Subobject code
55-59	Project Number (always 00000)
70-80	Transaction Amount

3504050493

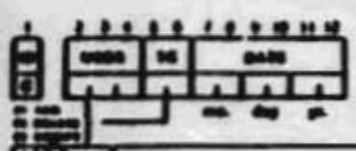
Record Layout for Master Files (Tape #006808)

Record Position	Description
1	Master File I.D. C - Client file (contains object codes) H - Header file (contains account numbers) V - Vendor (contains vendor numbers) O - Subobject (contains subobjects for each object)
2-4	User I.D. (always MPC)
5-6	File Maintenance Transaction code 01 - add record 02 - delete record 03 - modify record
7-12	File Maintenance Transaction date
13-15	Sequence number (significance varies by master file)
16-80	Significance varies by sequence number and master file (See attached record layouts)

8504050493

OF 'C' MASTERFILE

SEQ #'S 064-097 CONTAIN OBJECT CODES FOR ALL CLASSES OF TRANSACTIONS



COMPUTER DATA SYSTEMS, INC.
FINANCIAL SYSTEMS DIVISION
USER PROFILE FORM
EXPENSE (COST) CODES

DESCRIPTION	DESCRIPTION	DESCRIPTION
18-38	39-59	60-80

3504050498 7

'H' - MASTERFILE (HEADER/ACCOUNT PROFILE)

Computer Data Systems, Inc.

Financial Systems Division

7245 Wisconsin Avenue • Washington, D.C. 20014 • (202) 657-1720

ACCOUNT PROFILE RECORDS

REC.		DATE	SEQ. NO.	ACCOUNT DESCRIPTION 1 (PART I)	USER ACCOUNT NUMBER USER DESIGNATED--For REV/EXP Accounts, REV/EXP Codes must be zeros.	ACCOUNT DESCRIPTION 1 (PART II)
1 2 3 4						
H			001			
H			001			
H			001			
H			001			
H			001			
H			001			
H			001			
H			001			
H			001			
H			001			
H			001			
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H			001			
H			001			
H			001			
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H			001			
H			001			
H			001			

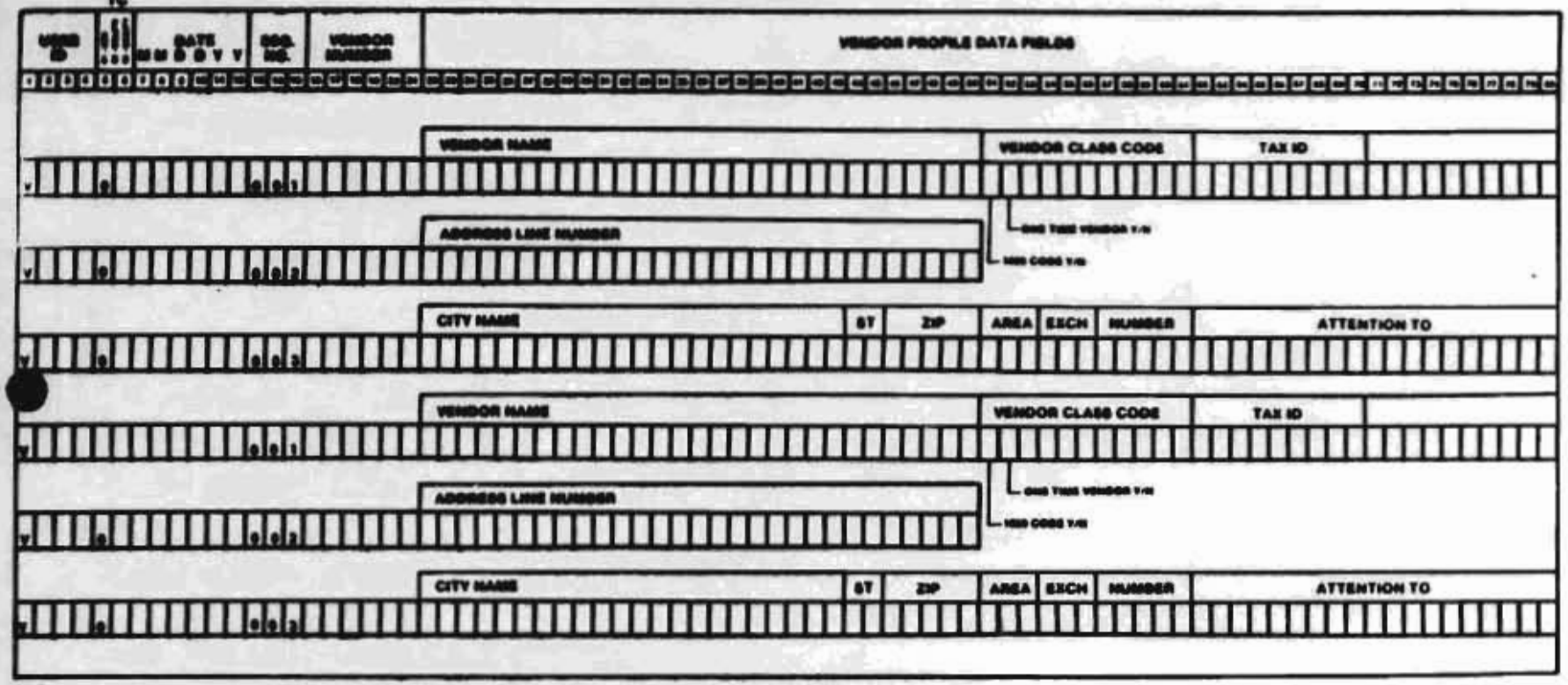
SEQUENCE NO. 1 --
General Ledger
Account Titles

SEQUENCE NO 2
TRIAL BALANCE ACCOUNT TITLES 8 5 0 4 0 5 0 4 9

FAAB-001 2-1-78

'V' - VENDOR FILE

CDSI
ACCOUNTS PAYABLE
VENDOR PROFILE RECORDS
4/101



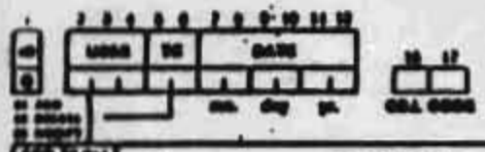
AP-2

8504052049897

'0' - MASTERFILE (SUBOBJECT)

FARC 630 11-1-79

COMPUTER DATA SYSTEMS, INC.
FINANCIAL SYSTEMS DIVISION
SUB-OBJECT CODE DESCRIPTIONS



SEQ CODE	DESCRIPTION	SEQ CODE	DESCRIPTION	SEQ CODE	DESCRIPTION
00	01-03	01	04-09	02	10-19
03		04		05	
06		07		08	
09		10		11	
12		13		14	
15		16		17	
18		19		20	
21		22		23	
24		25		26	
27		28		29	
30		31		32	
33		34		35	
36		37		38	
39		40		41	
42		43		44	
45		46		47	
48		49		50	
51		52		53	
54		55		56	
57		58		59	
60		61		62	
63		64		65	
66		67		68	
69		70		71	
72		73		74	
75		76		77	
78		79		80	
81		82		83	
84		85		86	
87		88		89	
90		91		92	
93		94		95	
96		97		98	
99					

FOR SEQ #: 2XX - REPRESENTS EXPENSE SUBOBJECT CODES
3XX - REPRESENTS ASSET & LIABILITY SUBOBJECT CODES

850405 9827

MONDALE

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

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 3, 1984

Kate Rosenthal
The Hills Building
Suite 800
Syracuse, New York 13202

Re: MUR 1667 and 1704
27th Congressional District
Delegates for Mondale, John
McAuliffe, as treasurer

Dear Mr. Rosenthal:

On June 25, 1984 you called this office to ask for an extension of time to respond to the complaint in MUR 1704. During that conversation, it became apparent that, because of a problem with the postal service, your clients had never received a copy of the complaint filed in MUR 1667. A copy of that complaint was mailed to you on June 26.

By letter dated June 25, 1984 you formally requested an extension of time to allow you to respond to both complaints 15 days after your receipt of the complaint in MUR 1667. On July 3rd, 1984, the Commission considered your request and voted to grant the extension. Accordingly, your response to MURs 1667 and 1704 are due 15 days from the date of your receipt of the complaint in MUR 1667.

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at 523-4143.

Sincerely,

Charles N. Steele

Charles N. Steele
General Counsel

8504049900

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
27th Congressional District Delegates for Mondale; John McAuliffe, as treasurer	)	MURs 1667 and 1704

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on July 3, 1984, the Commission decided by a vote of 5-0 to take the following actions in the above-captioned matter:

1. Grant the extension of time to respond to the complaint in MUR 1704 requested by the 27th Congressional District for Mondale Committee and John McAuliffe, as treasurer of the committee.

2. Send the letter attached to the General Counsel's report dated July 2, 1984.

Commissioners Aikens, Elliott, McDonald, McGarry, and Reiche voted affirmatively for the decision; Commissioner Harris did not cast a vote.

Attest:

7-3-84
Date

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

Received by the Commission Secretary on July 2, 1984 at 11:57 a.m.
Circulated to the Commissioners on July 2, 1984 at 4:00 p.m.
Vote deadline: July 3, 1984 at 4:00 p.m.

8504050499

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

84 JUL 2 All: 58

July 2, 1984

SENSITIVE

MEMORANDUM TO: The Commission

FROM: Charles N. Steele ONS/KAW
General Counsel

SUBJECT: Request for Extension of Time in MURs 1667 and 1704 - 27th Congressional District Delegates for Mondale, John McAuliffe, as treasurer

The Office of the General Counsel has received an additional request for an extension of time from above-named respondents in MURs 1667 and 1704. This office has reviewed the request and, in light of the circumstances, believes it should be granted.

Counsel representing the respondents telephoned this office on June 25, 1984 to request an extension of time to respond to the complaint in MUR 1704. During that conversation, it became apparent that the respondents had not received notification of the complaint in MUR 1704 until June 18, 1984 and had never received notification of the complaint in MUR 1667. Our records indicate that the Post Office was unable to deliver the complaint in MUR 1667 to the address verified as being that of the respondents. On June 26, 1984, a copy of the complaint in MUR 1667 was mailed to respondents.

By letter dated June 25, 1984, counsel requested that she be permitted to file responses to the complaints in both MURs 1667 and 1704 fifteen days after receipt of the complaint in MUR 1667.

Respondents will automatically be afforded fifteen days from the receipt of the complaint in MUR 1667 to respond in that matter, therefore, counsel's request for an extension relates only to the complaint in MUR 1704. This office recommends that the Commission grant the requested extension, as it will not unduly delay the matter and will allow counsel to provide a full response to both complaints.

3 5 0 4 0 5 0 4 9 9 2

Recommendation

Grant the extension of time to respond to the complaint in MUR 1704 requested by the 27th Congressional District for Mondale Committee and John McAuliffe, as treasurer and send attached letter.

Attachments
1. Request letter
2. Letter to respondents

8504050499 3

KATE ROSENTHAL
ATTORNEY AND COUNSELOR AT LAW
SUITE 800
THE HILLS BUILDING
SYRACUSE, NEW YORK 13202
315-471-0126

FEC
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

Attachment 1

3504049941

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Kate Rosenthal
The Hills Building
Suite 800
Syracuse, New York 13202

Re: MUR 1667 and 1702
27th Congressional District
Delegates for Mondale, John
McAuliffe, as treasurer

Dear Mr. Rosenthal:

On June 25, 1984 you called this office to ask for an extension of time to respond to the complaint in MUR 1704. During that conversation, it became apparent that, because of a problem with the postal service, your clients had never received a copy of the complaint filed in MUR 1667. A copy of that complaint was mailed to you on June 26.

By letter dated June 25, 1984 you formally requested an extension of time to allow you to respond to both complaints 15 days after your receipt of the complaint in MUR 1667. On July , 1984, the Commission considered your request and voted to grant the extension. Accordingly, your response to MURs 1667 and 1704 are due 15 days from the date of your receipt of the complaint in MUR 1667.

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Attachment 2

8504049950

Mondale for President
2301 Wisconsin Avenue, N.W.
Washington, D.C. 20007
Telephone: 202-625-1984

MONDALE

84 JUN 28 PM 12:22

June 27, 1984

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

Re: MUR 1667

Dear Mr. Steele:

This is in response to your letter of June 20, 1984, concerning the motion of Mondale for President Committee, Inc. ("MPC") to modify the FEC subpoena. With respect to your request for machine readable materials in document requests numbers 17 and 18, MPC will provide these to the Commission. As we stated in our motion, MPC does not believe that these materials will be usable by the Commission. However, since the Commission has requested them anyway, we will make them available. We have requested that copies be made of the materials, along with the necessary supporting documents. We anticipate that they will be available on approximately July 6, 1984.

Sincerely,

Carolyn U. Oliphant
Deputy General Counsel

Paid for by Mondale for President, Inc.

8504049 5

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

WASHINGTON, DC 200
PM
28 JUN
1984

84 JUN 22 PM 2

MONDALE

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

850405

SENSITIVE

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
RECEIVED
OFFICE OF THE SECRETARY
COMMISSION SECRETARY

84 JUN 19 A10:16
84 JUN 18 A10:16

Date and Time Transmitted MONDAY, 6-18-84, 4:00

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

RETURN TO COMMISSION SECRETARY BY TUESDAY, JUNE 19, 1984, 4:00

SUBJECT: MUR 1667 - Approval of 30 Day Extension,
Memorandum to the Commission
dated June 18, 1984

( ) I approve the recommendation

(✓) I object to the recommendation

COMMENTS: I voted for a 30 day extension. However there is no need to refer this back to the Commission, since 4 Commissioners favored the 30 day extension.

Date: 6-19-84 Signature: Thomas E. Harris

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

PLEASE RETURN ONLY THE BALLOT TO THE COMMISSION SECRETARY.

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

From the Office of the Commission Secretary

8504049993

SENSITIVE

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

84 JUN 19 A9:27

Date and Time Transmitted: MONDAY, 6-18-84, 4:00

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

RETURN TO COMMISSION SECRETARY BY TUESDAY, JUNE 19, 1984, 4:00

SUBJECT: MUR 1667 - Approval of 30 Day Extension,
Memorandum to the Commission
dated June 18, 1984

( ) I approve the recommendation

(✓) I object to the recommendation

COMMENTS: I agree with all of Counsel's recommendations except for the 30-day extension. My objection, however, is for the record.

Date: 6/18/84 Signature: Frank P. Reiche

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

PLEASE RETURN ONLY THE BALLOT TO THE COMMISSION SECRETARY.

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

From the Office of the Commission Secretary

3504050499 2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary

FROM: Office of General Counsel

DATE: June 11, 1984

SUBJECT: MUR 1667 - Memo to COMM

The attached is submitted as an Agenda document for the Commission Meeting of June 12, 1984

Open Session _____

Closed Session X

CIRCULATIONS		DISTRIBUTION	
48 Hour Tally Vote	[ ]	Compliance	[ ]
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	[ ]	Other (see distribution below)	[ ]

3540505000

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Kirk D. Messmer, Esquire
Miller, Canfield, Paddock and Stone
Suite 900
One Michigan Avenue
Lansing, Michigan 48933

Re: MUR 1667
Sixth District Delegates for
Mondale Committee

Dear Mr. Messmer:

This responds to your letter of May 30, 1984, wherein you requested an extension of time to file a response to the complaint and its supplements in the above-captioned matter. The Commission has considered your request and on June , 1984, voted not to grant an extension of time.

If you have any questions, please contact Stephen Mims at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

8504050063

6/9/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

MEMORANDUM

TO: Office of the Commission Secretary

FROM: Office of General Counsel

DATE: June 6, 1984

SUBJECT: MUR 1667 - Memorandum to The Commission
(Re: Request for extensions)

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

Open Session

Closed Session

CIRCULATIONS

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

24 HOUR TALLY VOTE

CIRCULATE ON PINK PAPER

SENSITIVE

DISTRIBUTION

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

8 5 0 4 0 5 0 0 0 4

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary

FROM: Office of General Counsel

DATE: May 17, 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	[X]	Other (see distribution below)	[ ]

24 HOUR TALLY VOTE

SENSITIVE - CIRCULATE ON PINK PAPER!!!

3 5 0 4 0 5 5 0 0 5

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

David Ifshin, Esquire
Carolyn Oliphant, Esquire
Mondale for President Committee, Inc.
2001 Wisconsin Avenue, N.W.
Washington, D.C. 20007

OK
6/20

Dear Mr. Ifshin and Ms. Oliphant:

This responds to your motion to modify Subpoena and Order to Answer Interrogatories filed by you with the Commission on June 5, 1984.

Before addressing your specific concerns, the Commission has some comments regarding your general concerns with the requests for information. With respect to your concern that the interrogatories and requests for documents are overbroad, we note that the Commission issued the subpoena and order with the intention that they be limited in scope. As indicated in the introductory paragraph immediately preceeding the "Definitions and Requests", the subpoena and order seek only information concerning the issue of affiliation between the Mondale for President Committee, Inc. (MPC) and the Mondale delegate committees. All questions and requests for information are limited by the introductory paragraph and all responses should be made with that limited scope in mind. Furthermore, the Commission believes its questions and requests for information are relevant to the inquiry before it and are intended to discover evidence reasonably related to the Commission's investigation.

Although the Commission agrees with MPC's assertion that certain requested information may be contained within reports already filed with the Commission by MPC and the delegate committees, it believes such information is not in a form that would enable it to resolve this matter in an expeditious manner. The Commission would hope, therefore, that MPC will continue to facilitate this investigation by cooperating to the fullest extent.

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On June 20, 1984, the Commission voted to take the following actions with regard to your motion:

A. The Interrogatories

(1)(b) and (5)(b). Motions denied. The Commission believes the Interrogatory is not overbroad nor does it believe the request regarding "strategic assistance" provided by MPC in forming delegate committees is vague. The Commission's interest in this question does not go to the actual content of political communications and expressions but, rather, the efforts exerted by MPC to provide such assistance in the formation and running of the delegate committees as would be required to show the presence or lack of any indicia of affiliation.

(5)(d). Motion denied. The Commission notes that your objection is based upon a conclusion of law that it does not believe has been pronounced. Furthermore, the Commission is not limited to using specific indicia of affiliation when considering this issue. The Commission's Regulations at 11 C.F.R. § 110.3(a)(1)(iii) set forth certain criteria that may include those listed; the list, therefore, is not exhaustive of all the elements that may be presented where the Commission determines political committees to be affiliated. Finally, as previously noted, the request is designed to lead to evidence that will be reasonably related to the Commission's effort in making a determination on the affiliation issue.

10. Motion denied. This question is limited to avoid the concerns expressed by MPC; it relates only to activity engaged in by MPC in assisting any delegate committee to obtain either paid or unpaid staff. Thus, the Commission does not agree that the question should be limited in scope to "officers or members" of a delegate committee.

11. Motion denied. MPC proposes that this interrogatory be stricken arguing that the word "services" is vague and that interrogatories 10 and 13 would answer the question. The Commission notes that the effect of question 10 is to identify efforts by MPC to staff the delegate committees with individuals who had not provided MPC with services while this question requests MPC to identify efforts to staff the delegate committees with persons who had performed services to MPC. The questions are mutually exclusive. Question 13, on the other hand, asks MPC to identify vendors which it recommended to the delegate committees. The Commission believes the questions are carefully tailored to the affiliation issues that are the subject matter of

8504050007

this investigation. This question is intended to identify those instances in which MPC suggested, directed or referred to a delegate committee, individuals who had performed services for MPC. The phrase to which MPC has stated an objection, "performing services" ... should be read to exclude communications relating to any necessary efforts by an individual delegate to become authorized by Mr. Mondale to be on a ballot.

12. Motion denied With respect to MPC's motion to strike because the phrase "performing services" is vague and seeks information not in MPC's possession, the Commission answers MPC's motion with the same explanation as made in question 11, above. In the event that such information is not in MPC's possession or control, the Commission would expect that MPC would supply what information it had in order to comply with the Commission's request. The Commission also notes that MPC's response to this question would be tailored to the issue before it regarding the possible affiliation between MPC and any delegate committee, thus including only the identification of such persons who performed services for a delegate committee at the suggestion or direction of MPC. This question also includes the identification of such persons whether paid or not.

With respect to MPC's motion to strike because the request seeks information already within the possession of the Commission, the Commission neither grants nor denies MPC's motion at this time. In the hope that the Committee and the Commission can work out an accomodation concerning the requested materials, the Commission accepts MPC's offer to provide the pertinent materials and requests that MPC advise the Commission in writing within five days of receipt of this letter whether it plans to submit the materials and, if so, the approximate date the Commission will receive them.

13. Motion denied. The question asks that MPC identify any vendors that it suggested be used by any delegate committee. The question is directed towards obtaining evidence that would be useful in the Commission's efforts to determine the extent to which MPC may have maintained any direction and/or control over the delegate committees. MPC's contention is, however, that the question would be relevant only in the context of an independent expenditure analysis and that "there is no statutory or regulatory basis for considering common vendors as indicative of affiliation." Section 110.3(a)(1)(iii) sets forth the criteria that may be applied to committees (such as the delegate committees and MPC) in determining whether they are affiliated.

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The criteria set forth in this section were not intended to be exhaustive; they are merely illustrative of the kinds of evidence that might be considered by the Commission in determining wheter committees are affiliated. In any event, evidence may be obtained that, while not directly related to the specific indicia provided in the Regulations, might go to proving one or more of the listed indicia when considered with the other evidence. The question is not directed exclusively to common vendors, it is directed, as previously noted, to obtaining evidence that, when considered with the rest of the evidence, will be relevant to the subject matter (i.e., affiliation) of the Commission's investigation.

16,17,18. Motions denied. The grounds stated by MPC in support of its motions to these questions are the same as those of its motions to Interrogatory (5)(d), above. The Commission, incorporating its comments to Interrogatory (5)(d) further notes that the purpose of these questions is not to delve in areas regarding the political content of campaign literature but, rather, to determine the independence of the delegate committees from MPC, as evidence concerning the question of affiliation.

B. The Requests for Documents

11,12. Motion denied. The Commission, noting its comments to Interrogatory 10, believes that the scope of its inquiry (as limited to the question of affiliation) avoids questions concerning the subjective intent of individuals' efforts on behalf of a committee. Because the question turns upon MPC's efforts to assit in the direction, maintainence and control of the delegate committees, by MPC, it avoids those concerns that you have expressed.

16. Motion denied. Your objections to this request were previously noted with regard to Interrogatories 16, 17 and 18. The Commission incorporates its rationale expressed for its position with respect to those questions.

17,18. The Commission neither grants nor denies MPC's motions at this time. In the hope that the Committee and the Commission can work out an accomodation concerning the requested materials, the Commission accepts MPC's offer to provide the pertinent materials and requests that MPC advise the Commission in writing within five days of receipt of this letter whether it plans to submit the materials and, if so, the approximate date the Commission will receive them.

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C. Requests for Extension of Time

The Commission has reviewed your request for a 30 day extension to respond to the interrogatories issued with the subpoena and order on May 23, 1984. The Commission has considered the magnitude of its requests, the circumstances you have described, and MPC's willingness to cooperate in this matter in deciding to grant you the requested extension. Your response should be filed on July 13, 1984.

In the event that you have any questions, please contact Stephen Mims, the attorney assigned to this matter at 523-4143.

Sincerely,

Charles N. Steele
General Counsel

8504050012

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary

FROM: Office of General Counsel

DATE: June 18, 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	[x]	Other (see distribution below)	[ ]

SENSITIVE

CIRCULATE ON PINK PAPER

24 HOUR TALLY VOTE

8504050013

ROUTING SLIP

___ Improper Complaint ltr.

___ No Jurisdiction ltr.

11 Respondent Notification ltr.

___ Complainant Notification ltr.

___ Other:

To KAG from BAJ on 6/18/84 for signature

To Docket from [illegible] on 6/18/84 for mailing

8504050011

Notification + Complaint #104

Dear Sir/Madam:

CHART II
POTENTIAL UNREGISTERED DELEGATE COMMITTEES FROM SELECTED PAC REPORTS

Recipient	Contributions	Amount
-NY - The Mondale Team (32nd C.D.) 504 Witmar Road N. Tonawanda, NY 14120	AFSCME-PEOPLE AFT-COPE CWA-COPE	$1,215 $3,000 $ 500
-NY - 18th C.D. Delegate Committee for Mondale 888 Grand Concourse Bronx, NY 10451	AFSCME-PEOPLE AFSCME-PEOPLE	$ 350 $ 50
-NY - 15th C.D. Delegates Coalition for Mondale 235 East 87th Street New York, NY 10028	AFSCME-PEOPLE AFSCME-PEOPLE AFT-COPE	$ 960 $ 750 $ 750
-FL - C.D. 6 Delegates for Mondale 2375 S.W. College Road Ocala, FL 32674	AFT-COPE	$ 500
-FL - C.D. 11 Delegates for Mondale 981 Church Street Rockledge, FL 32955	AFT-COPE	$ 500
-MA - 6th District Delegate for Mondale c/o John G. VonDusen 38 Pond Street Marble Head, MA 01948	SEIU-COPE	$ 500
✓ -OH - Ohio Mondale at Large Delegates State Committee Robert Malone, Treasurer 409 Brentwood Drive Marion, OH 43302	SEIU-COPE	$2,500
-PA - 15th C.D. Delegates for Mondale 4095 Tilghman Street Allentown, PA 18104	UAW V-CAP PA - At Large Delegates for Mondale	$ 500 $1,000

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Recipient	Contributions	Amount
- Mondale 2nd C.D. Delegate Recruitment Committee Pauline Davis, Treasurer 1007 Kempsville Road Virginia Beach, VA 23464	UFCW Active Ballot Club	$5,000
- Delegates Committee With Mondale P.O. Box 4029 San Juan, PR 00905	AFL-CIO COPE	$5,000
- West New York Elect Mondale Committee - 31st C.D. 201 Presidel Place Williamsville, NY 14221	AFT-COPE	$3,000
- Western Missouri Mondale Delegate Committee 3037 Teasdale St. Louis, MO 63130	UAW V-CAP	$2,500

Philadelphia Democratic County Exec Cmtee.
1421 Walnut St.
Phil. Pa, 19102.

($5,000

Mems

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Re: MUR 1704

Dear :

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.

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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 Kenneth A. Gross
Associate General Counsel

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

8504050013

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES N. STEELE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/JODY C. RANSOM

DATE: JUNE 19, 1984

SUBJECT: MUR 1667 - Comments regarding 30 Day extension, Memorandum to the Commission dated June 18, 1984

Attached are copies of Commissioner Harris' and Commissioner Reiche's vote sheets regarding the above-captioned matter.

Attachments

3 5 0 4 0 0 5 0 1 0

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 11, 1984

MEMORANDUM

TO: The Commission

FROM: Charles N. Steele CNS kaw
General Counsel

SUBJECT: MUR 1667
Subpoena and Order Issued

The attached document is submitted late in that the Commission approved subpoenas directed to Mondale for President are returnable on Wednesday, June 13, 1984. Thus, the Commission should take up this matter at its Executive Session of June 12, 1984.

Attachment

8504050020

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 11, 1984

MEMORANDUM TO: The Commission

FROM: Charles N. Steele
General Counsel

SUBJECT: Subpoena and Order Issued in MUR 1667

On May 23, 1984, the Commission issued a Subpoena and Order to the Mondale for President Committee, Inc., and Michael S. Berman, as treasurer (both respondents are hereinafter collectively referred to as "MPC"). MPC's response is due by June 13, 1984.

On June 5, 1984, the Office of the General Counsel, received a Motion to Modify Subpoena and Order to Answer Interrogatories from MPC. MPC asserts both general objections to the subpoena and order and enumerates specific objections. MPC reiterates its willingness to cooperate with the Commission's investigation, but urges the Commission to keep in mind the "delicate nature of the materials" sought in this investigation while considering MPC's motion. Finally, MPC requests an extension of time of 30 days in which to comply with the subpoena and order.

Prior to addressing MPC's specific objection, the Office of the General Counsel proposes some general comments regarding this matter. MPC has expressed some concern that the interrogatories and requests for documents are overbroad. This Office prepared these requests in such a manner as to limit their scope to the issues presently before the Commission. As stated in their definitional sections the subpoena and order were specifically designed not to go beyond the questions regarding the affiliation between MPC and the delegate committees.

The Office of the General Counsel also notes that the questions are designed to discover evidence that will be reasonably related to the Commission's inquiry. Some of the questions to MPC ask it to provide information that it contends is already in the possession of the Commission; because of this, MPC contends it is under no legal obligation to supply the information. Although this Office believes there is merit to MPC's contention on this point, we believe the Commission should

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not strike such requests, but rather explain to MPC in a letter that MPC's decision to supply the material will lead to a quicker resolution of this matter than would be otherwise possible - a goal both parties have adopted.

This Office has prepared a draft letter for the Commission's approval that sets forth the Commission's decision on each motion made by MPC and sets forth a short explanation for each decision, that reflects the discussion and recommendations below.

A. MPC's objections to the interrogatories

(1)(b) MPC objects to the request for information concerning "strategic assistance" in forming the delegate committees as being vague and overbroad. MPC believes the request could be construed as "covering the content of MPC's political communications and expression."

MPC's request ignores the limitation imposed upon the question by the introductory language of the subpoena and order immediately preceeding the "Definitions and Requests." That language limits the scope of the Commission's inquiry to the issue of MPC's affiliation with the Mondale Delegate Committees. Further, the proposed letter to MPC indicates the question does not seek information concerning the political beliefs of the delegates, but rather seeks information about MPC's role in such areas as advising delegates whether to establish delegate committees and the best way to set them up. In view of the limited scope of the inquiry and the explanatory language in the proposed letter, the Office of the General Counsel believes the question, as limited, is appropriate because it seeks information reasonably related to the issue of affiliation without interfering with the First Amendment rights of MPC and its delegates.

(5)(b) The same objections are presented here by MPC as in (1)(b). The Office of the General Counsel reiterates its response to (1)(b).

(5)(d) MPC objects to the request for information concerning "assistance in the preparation of campaign materials," contending that such coordination in the preparation of campaign materials" is permitted under 11 C.F.R. § 110.14(d)(2)(i)."

With respect to that argument, this Office first notes that Section 110.14(d)(2)(i) (the "coattails" provision) does not specifically address the degree to which a delegate committee may coordinate such expenditures with a presidential candidate. Assuming unlimited coordination is permitted, however, the Office of the General Counsel believes the question is still a

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legitimate inquiry because it seeks information concerning the degree of overall coordination between MPC and the delegate committees. Even though coordination of campaign materials alone may not constitute proof of affiliation, information about such activity and the degree to which it occurred, when viewed along with other evidence, is reasonably related to the Commission's determination of whether MPC established, financed, maintained and controlled the delegate committees.

MPC further contends that evidence of coordinating the preparation of campaign materials is not an indicia of affiliation. Section 110.3(a)(1)(iii) sets forth criteria that may be applied to committees (such as the delegate committees and MPC) in determining whether they are affiliated. The criteria set forth in this section are not intended to be exhaustive; they are merely illustrative of the kinds of evidence that the Commission might consider in determining whether committees are affiliated. In addition, although the information sought may not be directly indicative of the specific indicia provided in the Regulations, it may, when considered with other evidence, go to proving one or more of the listed indicia. The Office of the General Counsel believes such evidence would be properly considered by the Commission together with all other available evidence in determining whether MPC had the authority, power, or ability to direct the delegate committees or to otherwise influence the decision of the officers or members of the delegate committees. Thus, as has been previously noted, in the context of the limited scope of the Commission's inquiry into the question of affiliation, the Office of the General Counsel believes the question is appropriate.

10. MPC proposes that the scope of this question be limited to "officers or members" of a delegate committee because "the reasons why volunteers or staff of delegate committees chose to support the activities of particular committees is at the heart of the activity protected by the First Amendment." The General Counsel's Office notes that the question relates to activity engaged in by MPC in assisting any delegate committee in obtaining paid staff and volunteers. As indicated in the proposed letter the question posed in the interrogatory does not concern an individual's decision to support a delegate committee, but, rather, concerns efforts by MPC to direct, control or otherwise influence the delegate committees. The Office of the General Counsel believes, therefore, that the question as it relates to the issues of affiliation is proper as it does not focus upon the political beliefs of individuals who engaged in volunteer activities and is carefully tailored to avoid intrusion by the FEC into citizen participation in grass-roots activities.

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11. MPC proposed that this interrogatory be stricken arguing that the word "services" is vague and that interrogatories 10 and 13 would answer the question. The Office of the General Counsel notes that the effect of question 10 is to identify efforts by MPC to staff the delegate committees with individuals who had not provided MPC with services while this question requests MPC to identify efforts to staff the delegate committees with persons who had performed services to MPC. The questions are mutually exclusive. The Office of the General Counsel believes both questions are carefully tailored to elicit information reasonably related to the affiliation issues that are the subject matter of this investigation. Question 11 seeks to identify those instances in which MPC suggested, directed or referred individuals who had performed services for MPCto a delegate committee. Such evidence is relevant in determining whether MPC and the delegate committees are affiliated and might lead to other evidence that relates to that issue. In order to further clarify the question, the proposed letter indicates that the phrase to which MPC has stated an objection, "performing services" ... should be read to exclude communications relating to any necessary efforts by an individual delegate to become authorized by Mr. Mondale to be on a ballot.

12. MPC contends this interrogatory should be stricken because the phrase "performed services" is vague and because it seeks information not in the possesion of MPC. MPC further contends that information concerning "persons who received payment from MPC and from a delegate committee is already in the possession of the Commission, in the reports filed by the committees.

The General Counsel's Office answers MPC's objection to the phrase "performing services" with the same explanation as made in question 11, above. In the event that such information is not in MPC's possession or control, this Office would expect that MPC would supply what information it had in order to comply with the Commission's request. This Office also notes that MPC's response to this question should be tailored to the issue before the Commission regarding the possible affliation between MPC and any delegate committee, thus including only the identification of such persons who performed services for a delegate committee at the suggestion or direction of MPC. This question also includes the identification of such persons whether paid or not.

Although technically MPC is correct that the Commission cannot require it to produce information already in the Commission's possession, this Office does not recommend that the question be stricken. The information requested by the Commission is in the reports filed by MPC and the delegate committees; however, the information is not presently in a form

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that would facilitate the expeditious handling of this matter. For example, in the event that MPC made a payment to a person from its draft account (see discussion of this account in MPC's motion to modify Subpoena and Order at 9), MPC's reports filed with the Commission reflect those payments in the order they were made. Because MPC does not alphabetize its expenditures schedule reflecting these disbursements, extensive Commission resources would be required to identify these individuals. Thus, even though Commission staff might be able to identify such persons, the relevancy of the information, without some information linking their services to the delegate committees at the behest of MPC, would be questionable at best. Furthermore, MPC has indicated a willingness to cooperate fully with the Commission's investigation. In light of that willingness and the difficulty in culling the information from the reports, this Office recommends this request for information not be stricken.

13. MPC requests that this interrogatory also be stricken. The question asks that MPC identify any vendors that it suggested be used by any delegate committee. The question is directed towards obtaining evidence that would be useful in the Commission's efforts to determine the extent to which MPC may have maintained any direction and/or control over the delegate committees. MPC contends, however, that the question would be relevant only in the context of an independent expenditure analysis and that "there is no statutory or regulatory basis for considering common vendors as indicative of affiliation."

Section 110.3(a)(1)(iii) sets forth the criteria that may be applied to committees (such as the delegate committees and MPC) in determining whether they are affiliated. The criteria set forth in this section are not intended to be exhaustive; they are merely illustrative of the kinds of evidence that the Commission might consider in determining whether committees are affiliated. In any event, although the information sought may not be directly indicative of the specific indicia provided in the Regulations, it may, when considered with the other evidence, go to proving one or more of the listed indicia. This Office believes, therefore, that the question as posed by the Commission is appropriate.

16, 17, 18. MPC asserts the same objections to these 3 interrogatories as it set forth regarding question (5)(d), above. The Office of the General Counsel reiterates its explanation in (5)(d) for these questions noting, again, that the purpose for these question is not to delve into areas regarding the political content of the literature but, rather, to determine the degree of independence of the delegate committees from MPC, as evidence regarding the question of affiliation. Thus, this Office believes questions 16, 17, and 18 are appropriate in that they are relevant to the subject matter of the Commission's inquiry.

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B. MPC's Objections to the request for documents

11, 12. MPC moves to modify these requests to pertain only to "officers or members" of a delegate committee for the same reasons it set forth as to Interrogatory number 10. In its objection to Interrogatory number 10, MPC asserted that "the reasons why volunteers or staff support the activities of particular committees is at the heart of the activity protected by the First Amendment." The Office of the General Counsel reiterates its response to Interrogatory number 10. In addition, we note that the documents would be limited by the scope of this inquiry to those documents relating to efforts undertaken by MPC to arrange for or recommend certain identified individuals to staff the delegate committee, either in paid or volunteer positions. Thus the request does not go to an individual's decision to support a committee, but rather, goes to MPC's efforts to assist in the maintenance, direction and control of a delegate committee. The Office of the General Counsel believes, therefore, that in light of the Commission's stated narrowly defined inquiry, the requests for these documents are appropriate.

16. MPC's motion to strike this request is explained by the rationale set forth covering Interrogatories numbers 16, 17 and 18. The Office of the General Counsel incorporates its comments to those interrogatories as its response to this motion and recommends, therefore, that the motion be denied.

17,18. MPC urges the Commission to reconsider its two requests for machine-readable information. MPC contends that the Commission could not require the committee to produce this material as the information requested is "already in possession of the Commission."

As noted in an earlier discussion (see Interrogatory 12, above), the information that is contained within MPC's disclosure reports is not in a form that facilitates the Commission's efforts in this matter.

MPC indicates that it believes production of machine-readable information will not assist the Commission due to the need to create a program (not presently in existence) to sort the data in a form that would be usable. The Office of the General Counsel believes this material is needed in order to determine the degree to which the delegate committees and MPC coordinated their activities as evidenced by payments to common individuals and vendors. This Office has discussed the matter with appropriate Commission personnel and has been advised that the information provided by MPC could be sorted in a manner that would be usable in the Commission's inquiry. As MPC has

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indicated a willingness to cooperate fully with the Commission's investigation and as it would be less burdensome for Commission staff to sort the needed information from the MPC tapes, this Office recommends that the Commission not modify its request for the documents and materials requested in numbers 17 and 18.

B. Request for extension of time

MPC's response to the subpoena and order is due by June 13, 1984. Although MPC indicates that it expects to be able to supply the Commission with the majority of the requested documents and materials by that date, it indicates that additional time is needed to respond to the interrogatories. MPC insists that it is in the process of obtaining the information requested by the Commission as expeditiously as possible. MPC raises additional concerns regarding the need to contact staff and other personnel that are presently located around the country. MPC contends that without an extension of time, it would not be able to provide the Commission with complete answers to the Commission's questions. The Office of the General Counsel agrees that the information requested is specific and detailed and it may take some time for MPC to coordinate and compile the responses. This Office also notes that MPC has continually exhibited a willingness to cooperate in this matter. The Office of the General Counsel believes, therefore, that the Commission's interest would best be served by granting the requested extension of 30 days in which to respond to the interrogatories and to complete the document production.

Recommendations

1. Do no grant the motion to modify or strike interrogatory numbers (1)(b), (5)(b), (5)(d), 10, 11, 12, 13, 16, 17 and 18.

2. Do not grant the motion to modify or strike the request for document production numbers 11, 12, 16, 17 and 18.

3. Grant the Mondale for President Committee, Inc., and Michael S. Berman, as treasurer, a 30 day extension of time to respond to the Interrogatories and to complete the document production requests contained in the subpoena and order issued by the Commission on May 23, 1984, making such response due on July 13, 1984.

Attachment

Proposed letter

8504050027

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

David Ifshin, Esquire
Carolyn Oliphant, Esquire
Mondale for President Committee, Inc.
2001 Wisconsin Avenue, N.W.
Washington, D.C. 20007

Dear Mr. Ifshin and Ms. Oliphant:

This responds to your motion to modify Subpoena and Order to Answer Interrogatories filed by you with the Commission on June 5, 1984. The Commission has considered your motion and on June , 1984, voted to take the following actions regarding your motion.

Before addressing your specific concerns, the Commission has some comments regarding your general concerns with the requests for information. With respect to your concern that the interrogatories and requests for documents are overbroad, we note that the Commission issued the subpoena and order with the intention that they be limited in scope. As indicated in their definitional sections, the subpoena and order seek only information concerning the issue of affiliation between the Mondale for President Committee, Inc. (MPC) and the Mondale delegate committees. All questions and requests for information are limited by those definitional sections and all responses should be made with that limited scope in mind. Furthermore, the Commission believes its questions and requests for are relevant to the inquiry before it and are intended to discover evidence reasonably related to the Commission's investigation.

Although the Commission agrees with MPC's assertion that certain requested information may be contained within reports already filed with the Commission by MPC and the delegate committees, it believes such information is not in a form that would enable it to resolve this matter in an expeditious manner. The Commission would hope, therefore, that MPC will continue to facilitate this investigation by cooperating to the fullest extent.

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With the foregoing comments in mind, the Commission offers its decision and rationale for each motion by MPC:

A. The Interrogatories

(1)(b) and (5)(b). Motions denied. The Commission believes the Interrogatory is not overbroad nor does it believe the request regarding "strategic assistance" provided by MPC in forming delegate committees is vague. The Commission's interest in this question does not go to the actual content of political communications and expressions but, rather, the efforts exerted by MPC to provide such assistance in the forming of the delegate committees as would be required to show the presence or lack of any indicia of affiliation.

(5)(d). Motion denied. The Commission notes that your objection is based upon a conclusion of law that it does not believe has been pronounced. Furthermore, the Commission is not limited to using specific indicia of affiliation when considering this issues. The Commission's Regulations at 11 C.F.R. § 110.14(d)(2)(i) set forth certain criteria that may include those listed; the list is not, therefore, exhaustive of all the elements that may be presented where the Commission determines political committees to be affiliated. Finally, as previously noted, where the evidence leads to evidence that will be reasonably related to the Commission's effort in making a determination.

10. Motion denied. This question is limited to avoid the concerns expressed by MPC; it relates only to activity engaged in by MPC in assisting any delegate committee to obtain either paid or unpaid staff. Thus, the Commission does not agree that the question should be limited in scope to "officers or members" of a delegate committee.

11. Motion denied. You proposed that this interrogatory be stricken arguing that the word "services" is vague and that interrogatories 10 and 13 would answer the question. The Commission notes that the effect of question 10 is to identify efforts by MPC to staff the delegate committees with individuals who had not provided MPC with services while this question requests MPC to identify efforts to staff the delegate committees with persons who had performed services to MPC. The questions are mutually exclusive. Question 13, on the other hand, asks MPC to identify vendors which it recommended to the delegate committees. The Commission believes the questions are carefully tailored to the affiliation issues that are the subject matter of

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this investigation. This question is intended to identify those instances in which MPC suggested, directed or referred to a delegate committee, individuals who had performed services for MPC. The phrase to which MPC has stated an objection, "performing services" ... should be read to exclude communications relating to any necessary efforts by an individual delegate to become authorized by Mr. Mondale to be on a ballot.

12. Motion denied The Commission acknowledges that some of the requested information may already be in its possession. The Commission hopes, however, that MPC will supply the information in order to assist it in accommodating the interests of the parties to this matter by resolving it as expeditiously as possible.

The Commission answers MPC's objection to the phrase "performing services" with the same explanation as made in question 11, above. In the event that such information is not in MPC's possession or control, the Commission would expect that MPC would supply what information it had in order to comply with the Commission's request. The Commission also notes that MPC's response to this question would be tailored to the issue before it regarding the possible affiliation between MPC and any delegate committee, thus including only the identification of such persons who performed services for a delegate committee at the suggestion or direction of MPC. This question also includes the identification of such persons whether paid or not.

13. Motion denied. The question asks that MPC identify any vendors that it suggested be used by any delegate committee. The question is directed towards obtaining evidence that would be useful in the Commission's efforts to determine the extent to which MPC may have maintained any direction and/or control over the delegate committees. MPC's contention is, however, that the question would be relevant only in the context of an independent expenditure analysis and that "there is no statutory or regulatory basis for considering common vendors as indicative of affiliation." Section 110.3(a)(1)(iii) sets forth the criteria that may be applied to committees (such as the delegate committees and MPC) in determining whether they are affiliated. The criteria set forth in this section were not intended to be exhaustive; they are merely illustrative of the kinds of evidence that might be considered by the Commission in determining wheter committees are affiliated. In any event, evidence may be obtained that, while not directly related to the specific indicia provided in the Regulations, might go to proving one or more of the listed indicia when considered with the other evidence. The question is not directed exclusively to common vendors, it is directed, as previously noted, to obtaining evidence that, when

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considered with the rest of the evidence, will be relevant to the subject matter (i.e., affiliation) of the Commission's investigation.

16,17,18. Motions denied. The grounds stated by MPC in support of its motions to these questions are the same as those of its motions to Interrogatory (5)(d), above. The Commission, incorporating its comments to Interrogatory (5)(d) further notes that the purpose of these questions is not to delve in areas regarding the political content of campaign literature but, rather, to determine the independence of the delegate committees from MPC, as evidence concerning the question of affiliation.

B. The Requests for Documents

11,12. Motion denied. The Commission, noting its comments to Interrogatory 10, believes that the scope of its inquiry (as limited to the question of affiliation) avoids questions concerning the subjective intent of individuals' efforts on behalf of a committee. Because the question turns upon MPC's efforts to assit in the direction, maintainence and control of the delegate committees, by MPC, it avoids those concerns that you have expressed.

16. Motion denied. Your objections to this request were previously noted with regard to Interrogatories 16, 17 and 18. The Commission incorporates its rationale expressed for its position with respect to those questions.

17,18. Motion denied. As previously noted, the Commission agrees that some of the information requested by the subpoena and order may be in the possession of the Commission in reports filed by MPC. As MPC is aware, however, the information is not in a form that would facilitate the efforts of the Commission in concluding this matter. The Commission is aware if MPC's efforts to cooperate and hopes that it will continue to do so. The Commission will be able to use the information and access to the requested machine-readable material will assist the Commission in resolving this matter.

C. Requests for Extension of Time

The Commission has reviewed your request for a 30 day extension to respond to the interrogatories issued with the subpoena and order on May 23, 1984. The Commission has

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considered the magnitude of its requests, the circumstances you have described, and MPC's willingness to cooperate in this matter in deciding to grant you the requested extension. Your response should be filed on July 3, 1984.

In the event that you have any questions, please contact Stephen Mims, the attorney assigned to this matter at 523-4143.

Sincerely,

8504050032

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Kathleen N. Sullivan, Esquire
Waldleigh, Starr, Peters,
Dunn & Chiesa
95 Market Street
Manchester, New Hampshire 03101

Re: MUR 1667
New Hampshire 2nd District
Delegates for Mondale

Dear Ms. Sullivan:

This responds to your letter dated May 22, 1984, wherein you requested an extension of time in which to submit a response to the complaint and its supplements in the above-captioned matter. The Commission has considered your request and on , 1984, voted not to grant an extension.

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202)523-4143.

Sincerely,

Charles N. Steele
General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Stuart H. Singer, Esquire
Greensberg, Travrig, Askew,
Hoffman, Lipoff, Rosen & Quentel, P.A.
Brickell Concours
1401 Brickell Building
Miami, Florida 33131

Re: MUR 1667
Eighth, Ninth and Fourteenth
Congressional District Delegate
Committees for Mondale (FL)

Dear Mr. Singer:

This responds to your letter dated May 4, 1984, wherein you requested an extension of time in which to submit a response to the complaint and its supplements in the above-captioned matter. The Commission has considered your request and on , 1984, voted not to grant an extension.

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202)523-4143.

Sincerely,

Charles N. Steele
General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

James M. Beck, Esquire
Pepper, Hamilton & Scheetz
20th Floor
The Fidelity Building
123 South Broad Street
Philadelphia, Pennsylvania 19109

Re: MUR 1667
Third, Twelfth and Nineteenth
Congressional District Delegates
Committees for Mondale (PA)

Dear Mr. Beck:

This responds to your letter dated May 24, 1984, wherein you requested an extension of time in which to submit a response to the complaint and its supplements in the above-captioned matter. The Commission has considered your request and on , 1984, voted not to grant an extension.

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202)523-4143.

Sincerely,

Charles N. Steele
General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary

FROM: Office of General Counsel

DATE: May 29, 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	[X]	Other (see distribution below)	[ ]

SENSITIVE

CIRCULATE ON PINK PAPER

24 HOUR TALLY VOTE

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

David M. Ifshin, Esquire
Carolyn U. Oliphant, Esquire
Mondale for President Committee, Inc.
2201 Wisconsin Avenue
Suite 100
Washington, D.C. 20007

MUR 1667

Dear Mr. Ifshin and Ms. Oliphant:

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, April 27 and May 2, 1984, the Commission received supplemental submissions from the complainant. Copies of those submissions have been forwarded to you.

On May 22, 1984, the Commission received another submission from the complainant also pertaining to the allegations in the complaint. A copy of that submission was forwarded to you on May 25, 1984. A separate letter from the Office of the General Counsel was delivered to you on that day indicating that the Commission would decide whether the additional materials that were submitted on May 22, 1984, would be considered as a supplement or as an amendment to the complaint.

On May , 1984, the Commission considered the matter and determined that the materials that were submitted by the complainant on May 22, 1984, constitute a supplement to the complaint. Therefore, the Commission will proceed with its consideration of this matter pursuant to your earlier notifications. Accordingly, submission of this additional material will not result in a specific time period for response.

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The Commission also considered on , 1984, the complainant's request for immediate injunctive relief in this matter. The Commission voted to deny the request. The Commission will, of course, 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 attorney assigned to this matter at (202)523-4143.

Sincerely,

Charles N. Steele
General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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

Re: MUR 1667

Dear Mr. Quinn:

This responds to your request of May 22, 1984, wherein you urged the Commission to act expeditiously to resolve the matters raised in the complaint filed by you. You also specifically requested that the Commission seek immediate injunctive relief.

The Commission has considered your request and on May , 1984, voted to deny your request for immediate injunctive relief. The Commission is of the opinion that, in light of the present circumstances, a move by it to seek injunctive relief at this juncture would be inappropriate.

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at 523-4143.

Sincerely,

Charles N. Steele
General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary

FROM: Office of General Counsel

DATE: May 30, 1984

SUBJECT: MUR 1667 - Memorandum to The Commission

The attached is submitted as an Agenda document for the Commission Meeting of May 30, 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

SENSITIVE

ON AGENDA 5-30-84

3504050012

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary

FROM: Office of General Counsel

DATE: May 25, 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	[X]	Other (see distribution below)	[ ]

SENSITIVE

CIRCULATE ON PINK PAPER

24 HOUR TALLY VOTE

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

David M. Ifshin, Esq.
Carolyn U. Oliphant, Esq.
Mondale for President Committee, Inc.
Suite 100
2201 Wisconsin Avenue, N.W.
Washington, D.C. 20007

Re: MUR 1667
Mondale for President Committee, Inc.
Michael S. Berman, as treasurer

Dear Mr. Ifshin and Ms. Oliphant:

This acknowledges receipt of your letter concerning the escrowing and "refunding" of monies representing contributions received by the Mondale delegate committees from union political action committees. The Mondale for President Committee, Inc., is free to pursue whatever course of action it deems appropriate in possible mitigation of the violations alleged in MUR 1667. The Commission is unable to comment at this time on the legal implications of such action in view of the pendency of its own investigation into this matter.

If you wish to discuss this matter further please contact Stephen Mims, the attorney handling this matter at 523-4143.

Sincerely,

Charles N. Steele
General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary

FROM: Office of General Counsel

DATE: May 29, 1984

SUBJECT: MUR 1667 - Memorandum to The Commission

The attached is submitted as an Agenda document for the Commission Meeting of May 30, 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

SENSITIVE

ON AGENDA 5-30-84

8504050417

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary

FROM: Office of General Counsel

DATE: May 23, 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	[X]	Other (see distribution below)	[ ]

SENSITIVE - CIRCULATE ON PINK PAPER - 24 HOUR TALLY VOTE

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ROUTING SLIP

___ Improper Complaint ltr.

___ No Jurisdiction ltr.

1 Respondent Notification ltr.

___ Complainant Notification ltr.

___ Other:

To CS from Docket on 5/24/84 for signature

To Docket from _____ on _____ for mailing

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Mondale for President Committee, Inc.) MUR 1667
Michael S. Berman, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of May 22, 1984, do hereby certify that the Commission decided by a vote of 5-0 to take the following actions in MUR 1667:

1. Approve the subpoena and order to the Mondale for President Committee, Inc., and Michael S. Berman, as treasurer, as recommended in the General Counsel's report dated May 21, 1984, and amended in the meeting.

2. Approve and send the letter attached to the General Counsel's report dated May 21, 1984.

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

Attest:

5-22-84
Date

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

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

David M. Ifshin, Esquire
Carolyn U. Oliphant, Esquire
Mondale for President Committee, Inc.
Suite 100
2201 Wisconsin Avenue, N.W.
Washington, D.C. 20007

Re: MUR 1667
Mondale for President
Committee, Inc.
Michael S. Berman, as treasurer

Dear Mr. Ifshin and Ms. Oliphant:

On May 10, 1984, you received notification that the Commission found reason to believe that the Mondale for President Committee, Inc., and Michael S. Berman, as treasurer, had violated 2 U.S.C. §§ 441a(b)(1)(A) and 441a(f), provisions of the Federal Election Campaign Act of 1971, as amended. An investigation of this matter is being conducted and it has been determined that additional information from your clients is necessary.

Consequently, the Federal Election Commission has issued the attached subpoena and order which requires your clients to provide information which will assist the Commission in carrying out its statutory duty of supervising compliance with the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26, U.S. Code.

If you have any questions, please direct them to Stephen Mims, the attorney handling this matter, at (202)523-4143.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Subpoena and Order

8504050541

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary

FROM: Office of General Counsel

DATE: May 21, 1984

SUBJECT: MUR 1667 - Memorandum to The Commission

The attached is submitted as an Agenda document for the Commission Meeting of May 22, 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)	[ ]

SENSITIVE

CIRCULATE ON PINK PAPER

8504030503

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Kenneth J. Doran, Esq.
Smoler, Albert & Rostad
119 Monona Avenue - Suite 520
Madison, Wisconsin 53703

Re: MUR 1667
Wisconsin At-Large Delegate Committee

Dear Mr. Doran:

This responds to your May 15, 1984, request for an extension of time in which to respond to the complaint in the above-captioned matter. On May , 1984, the Commission considered your request and granted the Committee ten days extension of time. Thus, your response is due May 24, 1984.

Should you have any questions regarding this matter, please contact Stephen Mims, the attorney assigned to this matter at (202)523-4143.

Sincerely,

Charles N. Steele
General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary

FROM: Office of General Counsel

DATE: May 16, 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	[X]	Other (see distribution below)	[ ]

24 HOUR TALLY VOTE

PINK PAPER PLEASE!!!

8504050507

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 20, 1984

David Ifshin, Esquire
Carolyn Oliphant, Esquire
Mondale for President Committee, Inc.
2001 Wisconsin Avenue, N.W.
Washington, D.C. 20007

Dear Mr. Ifshin and Ms. Oliphant:

This responds to your motion to modify Subpoena and Order to Answer Interrogatories filed by you with the Commission on June 5, 1984.

Before addressing your specific concerns, the Commission has some comments regarding your general concerns with the requests for information. With respect to your concern that the interrogatories and requests for documents are overbroad, we note that the Commission issued the subpoena and order with the intention that they be limited in scope. As indicated in the introductory paragraph immediately preceeding the "Definitions and Requests", the subpoena and order seek only information concerning the issue of affiliation between the Mondale for President Committee, Inc. (MPC) and the Mondale delegate committees. All questions and requests for information are limited by the introductory paragraph and all responses should be made with that limited scope in mind. Furthermore, the Commission believes its questions and requests for information are relevant to the inquiry before it and are intended to discover evidence reasonably related to the Commission's investigation.

Although the Commission agrees with MPC's assertion that certain requested information may be contained within reports already filed with the Commission by MPC and the delegate committees, it believes such information is not in a form that would enable it to resolve this matter in an expeditious manner. The Commission would hope, therefore, that MPC will continue to facilitate this investigation by cooperating to the fullest extent.

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On June 20, 1984, the Commission voted to take the following actions with regard to your motion:

A. The Interrogatories

(1)(b) and (5)(b). Motions denied. The Commission believes the Interrogatory is not overbroad nor does it believe the request regarding "strategic assistance" provided by MPC in forming delegate committees is vague. The Commission's interest in this question does not go to the actual content of political communications and expressions but, rather, the efforts exerted by MPC to provide such assistance in the formation and running of the delegate committees as would be required to show the presence or lack of any indicia of affiliation.

(5)(d). Motion denied. The Commission notes that your objection is based upon a conclusion of law that it does not believe has been pronounced. Furthermore, the Commission is not limited to using specific indicia of affiliation when considering this issue. The Commission's Regulations at 11 C.F.R. § 110.3(a)(1)(iii) set forth certain criteria that may include those listed; the list, therefore, is not exhaustive of all the elements that may be presented where the Commission determines political committees to be affiliated. Finally, as previously noted, the request is designed to lead to evidence that will be reasonably related to the Commission's effort in making a determination on the affiliation issue.

10. Motion denied. This question is limited to avoid the concerns expressed by MPC; it relates only to activity engaged in by MPC in assisting any delegate committee to obtain either paid or unpaid staff. Thus, the Commission does not agree that the question should be limited in scope to "officers or members" of a delegate committee.

11. Motion denied. MPC proposes that this interrogatory be stricken arguing that the word "services" is vague and that interrogatories 10 and 13 would answer the question. The Commission notes that the effect of question 10 is to identify efforts by MPC to staff the delegate committees with individuals who had not provided MPC with services while this question requests MPC to identify efforts to staff the delegate committees with persons who had performed services to MPC. The questions are mutually exclusive. Question 13, on the other hand, asks MPC to identify vendors which it recommended to the delegate committees. The Commission believes the questions are carefully tailored to the affiliation issues that are the subject matter of

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this investigation. This question is intended to identify those instances in which MPC suggested, directed or referred to a delegate committee, individuals who had performed services for MPC. The phrase to which MPC has stated an objection, "performing services" ... should be read to exclude communications relating to any necessary efforts by an individual delegate to become authorized by Mr. Mondale to be on a ballot.

12. Motion denied With respect to MPC's motion to strike because the phrase "performing services" is vague and seeks information not in MPC's possession, the Commission answers MPC's motion with the same explanation as made in question 11, above. In the event that such information is not in MPC's possession or control, the Commission would expect that MPC would supply what information it had in order to comply with the Commission's request. The Commission also notes that MPC's response to this question would be tailored to the issue before it regarding the possible affiliation between MPC and any delegate committee, thus including only the identification of such persons who performed services for a delegate committee at the suggestion or direction of MPC. This question also includes the identification of such persons whether paid or not.

With respect to MPC's motion to strike because the request seeks information already within the possession of the Commission, the Commission neither grants nor denies MPC's motion at this time. In the hope that the Committee and the Commission can work out an accomodation concerning the requested materials, the Commission accepts MPC's offer to provide the pertinent materials and requests that MPC advise the Commission in writing within five days of receipt of this letter whether it plans to submit the materials and, if so, the approximate date the Commission will receive them.

13. Motion denied. The question asks that MPC identify any vendors that it suggested be used by any delegate committee. The question is directed towards obtaining evidence that would be useful in the Commission's efforts to determine the extent to which MPC may have maintained any direction and/or control over the delegate committees. MPC's contention is, however, that the question would be relevant only in the context of an independent expenditure analysis and that "there is no statutory or regulatory basis for considering common vendors as indicative of affiliation." Section 110.3(a)(1)(iii) sets forth the criteria that may be applied to committees (such as the delegate committees and MPC) in determining whether they are affiliated.

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The criteria set forth in this section were not intended to be exhaustive; they are merely illustrative of the kinds of evidence that might be considered by the Commission in determining wheter committees are affiliated. In any event, evidence may be obtained that, while not directly related to the specific indicia provided in the Regulations, might go to proving one or more of the listed indicia when considered with the other evidence. The question is not directed exclusively to common vendors, it is directed, as previously noted, to obtaining evidence that, when considered with the rest of the evidence, will be relevant to the subject matter (i.e., affiliation) of the Commission's investigation.

16,17,18. Motions denied. The grounds stated by MPC in support of its motions to these questions are the same as those of its motions to Interrogatory (5)(d), above. The Commission, incorporating its comments to Interrogatory (5)(d) further notes that the purpose of these questions is not to delve in areas regarding the political content of campaign literature but, rather, to determine the independence of the delegate committees from MPC, as evidence concerning the question of affiliation.

B. The Requests for Documents

11,12. Motion denied. The Commission, noting its comments to Interrogatory 10, believes that the scope of its inquiry (as limited to the question of affiliation) avoids questions concerning the subjective intent of individuals' efforts on behalf of a committee. Because the question turns upon MPC's efforts to assit in the direction, maintainence and control of the delegate committees, by MPC, it avoids those concerns that you have expressed.

16. Motion denied. Your objections to this request were previously noted with regard to Interrogatories 16, 17 and 18. The Commission incorporates its rationale expressed for its position with respect to those questions.

17,18. The Commission neither grants nor denies MPC's motions at this time. In the hope that the Committee and the Commission can work out an accomodation concerning the requested materials, the Commission accepts MPC's offer to provide the pertinent materials and requests that MPC advise the Commission in writing within five days of receipt of this letter whether it plans to submit the materials and, if so, the approximate date the Commission will receive them.

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C. Requests for Extension of Time

The Commission has reviewed your request for a 30 day extension to respond to the interrogatories issued with the subpoena and order on May 23, 1984. The Commission has considered the magnitude of its requests, the circumstances you have described, and MPC's willingness to cooperate in this matter in deciding to grant you the requested extension. Your response should be filed on July 13, 1984.

In the event that you have any questions, please contact Stephen Mims, the attorney assigned to this matter at 523-4143.

Sincerely,

Charles N. Steele (for MM)

Charles N. Steele
General Counsel

8504050506 1

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 1667
Approval of 30 Day Extension for Mondale for President, Inc. to Respond to the Subpoena and Order	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on June 19, 1984, the Commission decided by a vote of 4-2 to take the following actions in MUR 1667:

1. Do not grant the motion to modify or strike interrogatory numbers (1)(b), (5)(d), 10, 11, 12, 13, 16, 17 and 18.

2. Do not grant the motion to modify or strike the request for document production numbers 11, 12, 16, 17 and 18.

3. Grant the Mondale for President Committee, Inc. and Michael S. Berman, as treasurer, a 30 day extension of time to respond to the Interrogatories and to complete the document production requests contained in the subpoena and order issued by the Commission on May 23, 1984, making such response due on July 13, 1984.

4. Approve the letter attached to the General Counsel's June 18, 1984 Memorandum to the Commission.

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

Attest:

6-20-84
Date

Marjorie W. Emmons
Secretary of the Commission

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SENSITIVE

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

84 JUN 18 P3: 16

June 18, 1984

MEMORANDUM

TO: The Commission

FROM: Charles N. Steele CNS/kmm
General Counsel

SUBJECT: Approval of 30 Day Extension for Mondale for President, Inc. to Respond to the Subpoena and Order in MUR 1667

A review of the minutes for the June 12, 1984 Executive Sesssion Meeting and discussions with the Secretary indicate that no formal vote was taken with respect to the granting of a 30 day extension to respond to the subpoena and order in MUR 1667, although the Commission was polled and it appears there were sufficient votes to grant the extension. Accordingly, we have included a recommendation to that effect in the attached revised memorandum so that the record will reflect a formal vote on the matter.

Attachment

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RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

84 JUN 18 P3: 18

June 18, 1984

MEMORANDUM TO: The Commission

FROM: Charles N. Steele CNS/kmm
General Counsel

SUBJECT: Subpoena and Order Issued in MUR 1667

On May 23, 1984, the Commission issued a Subpoena and Order to the Mondale for President Committee, Inc., and Michael S. Berman, as treasurer (both respondents are hereinafter collectively referred to as "MPC"). MPC's response was originally due by June 13, 1984.

On June 5, 1984, the Office of the General Counsel, received a Motion to Modify Subpoena and Order to Answer Interrogatories from MPC. MPC asserts both general objections to the subpoena and order and enumerates specific objections. MPC reiterates its willingness to cooperate with the Commission's investigation, but urges the Commission to keep in mind the "delicate nature of the materials" sought in this investigation while considering MPC's motion. Finally, MPC requests an extension of time of 30 days in which to comply with the subpoena and order.

Prior to addressing MPC's specific objection, the Office of the General Counsel proposes some general comments regarding this matter. MPC has expressed some concern that the interrogatories and requests for documents are overbroad. This Office prepared these requests in such a manner as to limit their scope to the issues presently before the Commission. As stated in their definitional sections the subpoena and order were specifically designed not to go beyond the questions regarding the affiliation between MPC and the delegate committees.

The Office of the General Counsel also notes that many of the questions are designed to discover evidence that will be reasonably related to the Commission's inquiry. Some of the questions to MPC ask it to provide information that it contends is already in the possession of the Commission; because of this, MPC contends it is under no legal obligation to supply the information. Although this Office believes there is merit to MPC's contention on this point, we believe the Commission should

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not strike such requests, but rather explain to MPC in a letter that MPC's decision to supply the material will lead to a quicker resolution of this matter than would be otherwise possible - a goal both parties have adopted.

This Office has prepared a draft letter for the Commission's approval that sets forth the Commission's decision on each motion made by MPC and sets forth a short explanation for each decision, that reflects the discussion and recommendations below.

A. MPC's objections to the interrogatories

(1)(b) MPC objects to the request for information concerning "strategic assistance" in forming the delegate committees as being vague and overbroad. MPC believes the request could be construed as "covering the content of MPC's political communications and expression."

MPC's request ignores the limitation imposed upon the question by the introductory language of the subpoena and order immediately preceeding the "Definitions and Requests." That language limits the scope of the Commission's inquiry to the issue of MPC's affiliation with the Mondale Delegate Committees. Further, the proposed letter to MPC indicates the question does not seek information concerning the political beliefs of the delegates, but rather seeks information about MPC's role in such areas as advising delegates whether to establish delegate committees and the best way to set them up. In view of the limited scope of the inquiry and the explanatory language in the proposed letter, the Office of the General Counsel believes the question, as limited, is appropriate because it seeks information reasonably related to the issue of affiliation without interfering with the First Amendment rights of MPC and its delegates.

(5)(b) The same objections are presented here by MPC as in (1)(b). The Office of the General Counsel reiterates its response to (1)(b).

(5)(d) MPC objects to the request for information concerning "assistance in the preparation of campaign materials," contending that such coordination in the preparation of campaign materials" is permitted under 11 C.F.R. § 110.14(d)(2)(i)."

With respect to that argument, this Office first notes that Section 110.14(d)(2)(i) (the "coattails" provision) does not specifically address the degree to which a delegate committee may coordinate such expenditures with a presidential candidate. Assuming unlimited coordination is permitted, however, the Office of the General Counsel believes the question is still a

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legitimate inquiry because it seeks information concerning the degree of overall coordination between MPC and the delegate committees. Even though coordination of campaign materials alone may not constitute proof of affiliation, information about such activity and the degree to which it occurred, when viewed along with other evidence, is reasonably related to the Commission's determination of whether MPC established, financed, maintained and controlled the delegate committees.

MPC further contends that evidence of coordinating the preparation of campaign materials is not an indicia of affiliation. Section 110.3(a)(1)(iii) sets forth criteria that may be applied to committees (such as the delegate committees and MPC) in determining whether they are affiliated. The criteria set forth in this section are not intended to be exhaustive; they are merely illustrative of the kinds of evidence that the Commission might consider in determining whether committees are affiliated. In addition, although the information sought may not be directly indicative of the specific indicia provided in the Regulations, it may, when considered with other evidence, go to proving one or more of the listed indicia. The Office of the General Counsel believes such evidence would be properly considered by the Commission together with all other available evidence in determining whether MPC had the authority, power, or ability to direct the delegate committees or to otherwise influence the decision of the officers or members of the delegate committees. Thus, as has been previously noted, in the context of the limited scope of the Commission's inquiry into the question of affiliation, the Office of the General Counsel believes the question is appropriate.

10. MPC proposes that the scope of this question be limited to "officers or members" of a delegate committee because "the reasons why volunteers or staff of delegate committees chose to support the activities of particular committees is at the heart of the activity protected by the First Amendment." The General Counsel's Office notes that the question relates to activity engaged in by MPC in assisting any delegate committee in obtaining paid staff and volunteers. As indicated in the proposed letter the question posed in the interrogatory does not concern an individual's decision to support a delegate committee, but, rather, concerns efforts by MPC to direct, control or otherwise influence the delegate committees. The Office of the General Counsel believes, therefore, that the question as it relates to the issues of affiliation is proper as it does not focus upon the political beliefs of individuals who engaged in volunteer activities and is carefully tailored to avoid intrusion by the FEC into citizen participation in grass-roots activities.

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11. MPC proposed that this interrogatory be stricken arguing that the word "services" is vague and that interrogatories 10 and 13 would answer the question. The Office of the General Counsel notes that the effect of question 10 is to identify efforts by MPC to staff the delegate committees with individuals who had not provided MPC with services while this question requests MPC to identify efforts to staff the delegate committees with persons who had performed services to MPC. The questions are mutually exclusive. The Office of the General Counsel believes both questions are carefully tailored to elicit information reasonably related to the affiliation issues that are the subject matter of this investigation. Question 11 seeks to identify those instances in which MPC suggested, directed or referred individuals who had performed services for MPCto a delegate committee. Such evidence is relevant in determining whether MPC and the delegate committees are affiliated and might lead to other evidence that relates to that issue. In order to further clarify the question, the proposed letter indicates that the phrase to which MPC has stated an objection, "performing services" ... should be read to exclude communications relating to any necessary efforts by an individual delegate to get on the ballot.

12. MPC contends this interrogatory should be stricken because the phrase "performed services" is vague and because it seeks information not in the possesion of MPC. MPC further contends that information concerning "persons who received payment from MPC and from a delegate committee is already in the possession of the Commission, in the reports filed by the committees.

The General Counsel's Office answers MPC's objection to the phrase "performing services" with the same explanation as made in question 11, above. In the event that such information is not in MPC's possession or control, this Office would expect that MPC would supply what information it had in order to comply with the Commission's request. This Office also notes that MPC's response to this question should be tailored to the issue before the Commission regarding the possible affliation between MPC and any delegate committee, thus including only the identification of such persons who performed services for a delegate committee at the suggestion or direction of MPC. This question also includes the identification of such persons whether paid or not.

Although technically MPC is correct that the Commission cannot require it to produce information already in the Commission's possession, this Office does not recommend that the question be stricken. The information requested by the Commission is in the reports filed by MPC and the delegate committees; however, the information is not presently in a form

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that would facilitate the expeditious handling of this matter. For example, in the event that MPC made a payment to a person from its draft account (see discussion of this account in MPC's motion to modify Subpoena and Order at 9), MPC's reports filed with the Commission reflect those payments in the order they were made. Because MPC does not alphabetize its expenditures schedule reflecting these disbursements, extensive Commission resources would be required to identify these individuals. Thus, even though Commission staff might be able to identify such persons, the relevancy of the information, without some information linking their services to the delegate committees at the behest of MPC, would be questionable at best. Furthermore, MPC has indicated a willingness to cooperate fully with the Commission's investigation. In light of that willingness and the difficulty in culling the information from the reports, this Office recommends this request for information not be stricken.

13. MPC requests that this interrogatory also be stricken. The question asks that MPC identify any vendors that it suggested be used by any delegate committee. The question is directed towards obtaining evidence that would be useful in the Commission's efforts to determine the extent to which MPC may have maintained any direction and/or control over the delegate committees. MPC contends, however, that the question would be relevant only in the context of an independent expenditure analysis and that "there is no statutory or regulatory basis for considering common vendors as indicative of affiliation."

Section 110.3(a)(1)(iii) sets forth the criteria that may be applied to committees (such as the delegate committees and MPC) in determining whether they are affiliated. The criteria set forth in this section are not intended to be exhaustive; they are merely illustrative of the kinds of evidence that the Commission might consider in determining whether committees are affiliated. In any event, although the information sought may not be directly indicative of the specific indicia provided in the Regulations, it may, when considered with the other evidence, go to proving one or more of the listed indicia. This Office believes, therefore, that the question as posed by the Commission is appropriate.

16, 17, 18. MPC asserts the same objections to these 3 interrogatories as it set forth regarding question (5)(d), above. The Office of the General Counsel reiterates its explanation in (5)(d) for these questions noting, again, that the purpose for these question is not to delve into areas regarding the political content of the literature but, rather, to determine the degree of independence of the delegate committees from MPC, as evidence regarding the question of affiliation. Thus, this Office believes questions 16, 17, and 18 are appropriate in that they are relevant to the subject matter of the Commission's inquiry.

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B. MPC's Objections to the request for documents

11, 12. MPC moves to modify these requests to pertain only to "officers or members" of a delegate committee for the same reasons it set forth as to Interrogatory number 10. In its objection to Interrogatory number 10, MPC asserted that "the reasons why volunteers or staff support the activities of particular committees is at the heart of the activity protected by the First Amendment." The Office of the General Counsel reiterates its response to Interrogatory number 10. In addition, we note that the documents would, be limited by the scope of this inquiry, to those documents relating to efforts undertaken by MPC to arrange for or recommend certain identified individuals to staff the delegate committee, either in paid or volunteer positions. Thus the request does not go to an individual's decision to support a committee, but rather, goes to MPC's efforts to assist in the maintenance, direction and control of a delegate committee. The Office of the General Counsel believes, therefore, that in light of the Commission's stated narrowly defined inquiry, the requests for these documents are appropriate.

16. MPC's motion to strike this request is explained by the rationale set forth covering Interrogatories numbers 16, 17 and 18. The Office of the General Counsel incorporates its comments to those interrogatories as its response to this motion and recommends, therefore, that the motion be denied.

17,18. MPC urges the Commission to reconsider its two requests for machine-readable information. MPC contends that the Commission could not require the committee to produce this material as the information requested is "already in possession of the Commission."

As noted in an earlier discussion (see Interrogatory 12, above), the information that is contained within MPC's disclosure reports is not in a form that facilitates the Commission's efforts in this matter.

MPC indicates that it believes production of machine-readable information will not assist the Commission due to the need to create a program (not presently in existence) to sort the data in a form that would be usable. The Office of the General Counsel believes this material is needed in order to determine the degree to which the delegate committees and MPC coordinated their activities as evidenced by payments to common individuals and vendors. This Office has discussed the matter with appropriate Commission personnel and has been advised that the information provided by MPC could be sorted in a manner that would be usable in the Commission's inquiry. As MPC has

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indicated a willingness to cooperate fully with the Commission's investigation and as it would be less burdensome for Commission staff to sort the needed information from the MPC tapes, this Office recommends that the Commission not modify its request for the documents and materials requested in numbers 17 and 18.

B. Request for extension of time

MPC's response to the subpoena and order is due by June 13, 1984. Although MPC indicates that it expects to be able to supply the Commission with the majority of the requested documents and materials by that date, it indicates that additional time is needed to respond to the interrogatories. MPC insists that it is in the process of obtaining the information requested by the Commission as expeditiously as possible. MPC raises additional concerns regarding the need to contact staff and other personnel that are presently located around the country. MPC contends that without an extension of time, it would not be able to provide the Commission with complete answers to the Commission's questions. The Office of the General Counsel agrees that the information requested is specific and detailed and it may take some time for MPC to coordinate and compile the responses. This Office also notes that MPC has continually exhibited a willingness to cooperate in this matter. The Office of the General Counsel believes, therefore, that the Commission's interest would best be served by granting the requested extension of 30 days in which to respond to the interrogatories and to complete the document production.

Recommendations

1. Do not grant the motion to modify or strike interrogatory numbers (1)(b), (5)(b), (5)(d), 10, 11, 12, 13, 16, 17 and 18.

2. Do not grant the motion to modify or strike the request for document production numbers 11, 12, 16, 17 and 18.

3. Grant the Mondale for President Committee, Inc., and Michael S. Berman, as treasurer, a 30 day extension of time to respond to the Interrogatories and to complete the document production requests contained in the subpoena and order issued by the Commission on May 23, 1984, making such response due on July 13, 1984.

4. Approve the attached letter.

Attachment

Proposed letter

8504050073

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

David Ifshin, Esquire
Carolyn Oliphant, Esquire
Mondale for President Committee, Inc.
2001 Wisconsin Avenue, N.W.
Washington, D.C. 20007

Dear Mr. Ifshin and Ms. Oliphant:

This responds to your motion to modify Subpoena and Order to Answer Interrogatories filed by you with the Commission on June 5, 1984.

Before addressing your specific concerns, the Commission has some comments regarding your general concerns with the requests for information. With respect to your concern that the interrogatories and requests for documents are overbroad, we note that the Commission issued the subpoena and order with the intention that they be limited in scope. As indicated in the introductory paragraph immediately preceeding the "Definitions and Requests", the subpoena and order seek only information concerning the issue of affiliation between the Mondale for President Committee, Inc. (MPC) and the Mondale delegate committees. All questions and requests for information are limited by the introductory paragraph and all responses should be made with that limited scope in mind. Furthermore, the Commission believes its questions and requests for information are relevant to the inquiry before it and are intended to discover evidence reasonably related to the Commission's investigation.

Although the Commission agrees with MPC's assertion that certain requested information may be contained within reports already filed with the Commission by MPC and the delegate committees, it believes such information is not in a form that would enable it to resolve this matter in an expeditious manner. The Commission would hope, therefore, that MPC will continue to facilitate this investigation by cooperating to the fullest extent.

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On June , 1984, the Commission voted to take the following actions with regard to your motion:

A. The Interrogatories

(1)(b) and (5)(b). Motions denied. The Commission believes the Interrogatory is not overbroad nor does it believe the request regarding "strategic assistance" provided by MPC in forming delegate committees is vague. The Commission's interest in this question does not go to the actual content of political communications and expressions but, rather, the efforts exerted by MPC to provide such assistance in the forming and running of the delegate committees as would be required to show the presence or lack of any indicia of affiliation.

(5)(d). Motion denied. The Commission notes that your objection is based upon a conclusion of law that it does not believe has been pronounced. Furthermore, the Commission is not limited to using specific indicia of affiliation when considering this issue. The Commission's Regulations at 11 C.F.R. § 110.14(d)(2)(i) set forth certain criteria that may include those listed; the list, therefore, is not exhaustive of all the elements that may be presented where the Commission determines political committees to be affiliated. Finally, as previously noted, the request is designed to lead to evidence that will be reasonably related to the Commission's effort in making a determination on the affiliation issue.

10. Motion denied. This question is limited to avoid the concerns expressed by MPC; it relates only to activity engaged in by MPC in assisting any delegate committee to obtain either paid or unpaid staff. Thus, the Commission does not agree that the question should be limited in scope to "officers or members" of a delegate committee.

11. Motion denied. MPC proposes that this interrogatory be stricken arguing that the word "services" is vague and that interrogatories 10 and 13 would answer the question. The Commission notes that the effect of question 10 is to identify efforts by MPC to staff the delegate committees with individuals who had not provided MPC with services while this question requests MPC to identify efforts to staff the delegate committees with persons who had performed services to MPC. The questions are mutually exclusive. Question 13, on the other hand, asks MPC to identify vendors which it recommended to the delegate committees. The Commission believes the questions are carefully tailored to the affiliation issues that are the subject matter of

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this investigation. This question is intended to identify those instances in which MPC suggested, directed or referred to a delegate committee, individuals who had performed services for MPC. The phrase to which MPC has stated an objection, "performing services" ... should be read to exclude communications relating to any necessary efforts by an individual delegate to become authorized by Mr. Mondale to be on a ballot.

12. Motion denied With respect to MPC's motion to strike because the phrase "performing services" is vague and seeks information not in MPC's possession, the Commission answers MPC's motion with the same explanation as made in question 11, above. In the event that such information is not in MPC's possession or control, the Commission would expect that MPC would supply what information it had in order to comply with the Commission's request. The Commission also notes that MPC's response to this question would be tailored to the issue before it regarding the possible affiliation between MPC and any delegate committee, thus including only the identification of such persons who performed services for a delegate committee at the suggestion or direction of MPC. This question also includes the identification of such persons whether paid or not.

With respect to MPC's motion to strike because the request seeks information already within the possession of the Commission, the Commission neither grants nor denies MPC's motion at this time. In the hope that the Committee and the Commission can work out an accomodation concerning the requested materials, the Commission accepts MPC's offer to provide the pertinent materials and requests that MPC advise the Commission in writing within five days of receipt of this letter whether it plans to submit the materials and, if so, the approximate date the Commission will receive them.

13. Motion denied. The question asks that MPC identify any vendors that it suggested be used by any delegate committee. The question is directed towards obtaining evidence that would be useful in the Commission's efforts to determine the extent to which MPC may have maintained any direction and/or control over the delegate committees. MPC's contention is, however, that the question would be relevant only in the context of an independent expenditure analysis and that "there is no statutory or regulatory basis for considering common vendors as indicative of affiliation." Section 110.3(a)(1)(iii) sets forth the criteria that may be applied to committees (such as the delegate committees and MPC) in determining whether they are affiliated.

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The criteria set forth in this section were not intended to be exhaustive; they are merely illustrative of the kinds of evidence that might be considered by the Commission in determining wheter committees are affiliated. In any event, evidence may be obtained that, while not directly related to the specific indicia provided in the Regulations, might go to proving one or more of the listed indicia when considered with the other evidence. The question is not directed exclusively to common vendors, it is directed, as previously noted, to obtaining evidence that, when considered with the rest of the evidence, will be relevant to the subject matter (i.e., affiliation) of the Commission's investigation.

16,17,18. Motions denied. The grounds stated by MPC in support of its motions to these questions are the same as those of its motions to Interrogatory (5)(d), above. The Commission, incorporating its comments to Interrogatory (5)(d) further notes that the purpose of these questions is not to delve in areas regarding the political content of campaign literature but, rather, to determine the independence of the delegate committees from MPC, as evidence concerning the question of affiliation.

B. The Requests for Documents

11,12. Motion denied. The Commission, noting its comments to Interrogatory 10, believes that the scope of its inquiry (as limited to the question of affiliation) avoids questions concerning the subjective intent of individuals' efforts on behalf of a committee. Because the question turns upon MPC's efforts to assit in the direction, maintainence and control of the delegate committees, by MPC, it avoids those concerns that you have expressed.

16. Motion denied. Your objections to this request were previously noted with regard to Interrogatories 16, 17 and 18. The Commission incorporates its rationale expressed for its position with respect to those questions.

17,18. The Commission neither grants nor denies MPC's motions at this time. In the hope that the Committee and the Commission can work out an accomodation concerning the requested materials, the Commission accepts MPC's offer to provide the pertinent materials and requests that MPC advise the Commission in writing within five days of receipt of this letter whether it plans to submit the materials and, if so, the approximate date the Commission will receive them.

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C. Requests for Extension of Time

The Commission has reviewed your request for a 30 day extension to respond to the interrogatories issued with the subpoena and order on May 23, 1984. The Commission has considered the magnitude of its requests, the circumstances you have described, and MPC's willingness to cooperate in this matter in deciding to grant you the requested extension. Your response should be filed on July 13, 1984.

In the event that you have any questions, please contact Stephen Mims, the attorney assigned to this matter at 523-4143.

Sincerely,

8504305073

GC#3578

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

MONDALE

June 12, 1984

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

RE: MUR 1704

Dear Mr. Steele:

On June 1, 1984, the Mondale for President Committee, Inc. received the above-referenced complaint filed by the National Right to Work Committee. The MPC response is due June 18. Three days before receipt of this complaint, MPC was served with a subpoena for document production and order to answer interrogatories in connection with MUR 1667 which is due on or before June 13.

On June 5, 1984, MPC filed a request for an extension of time in which to respond to the subpoena and interrogatories because of the substantial volume of information sought. To date we have not been informed as to whether that request will be granted. Thus, we have been working on the assumption that our response will be due on June 13.

The preparation of a response to the subpoena and interrogatories in the event that we must respond to them within 15 days has required substantial effort by MPC's legal staff in addition to the increased work load due to convention and general election planning. This has made it very difficult to devote adequate time and personnel to the preparation of a response to MUR 1704.

The complaint filed by NRWC sets forth a substantial number of factual allegations which were not previously raised and responded to in MUR 1667 and requires MPC to investigate those allegations in order to frame a complete and accurate response. Despite our good faith efforts, we do not have the resources to do this within the time allowed.

Paid for by Mondale for President, Inc.

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MPC therefore requests an additional 15 days beyond the current due date of June 18 in order to prepare its response to MUR 1704 and would further request a reply to this request by Thursday, June 14. Even if the Commission informs us prior to June 13 that we may have an additional 30 days to comply with the subpoena, we will need at least 5 additional days to file a substantive response to MUR 1704 since we have had to divert resources from its preparation.

Thank you for your prompt attention to this matter.

Sincerely,

Lyn Oliphant

Carolyn U. Oliphant
Deputy General Counsel

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CARDINAL COURIER COMPANY

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P.O. Box 3259
Arlington, VA 22203

ACCT: MEMO FOR PRESIDENT

AUTH. BY:

DEL. FROM: MONDALE FOR PRES
2201 WISCONSIN AVE NW
DC 20007

DEL. TO: CHARLES N. STEELE
FEDERAL ELECTION COMM
1325 K STREET NW DC

SPEC. INST:

DRIVER: Scott

DATE: 6-12-84

TIME:

W/T:

O/W:

R/T:

MISC:

ZONE:

TOTAL:

REC. BY: Patty 10:10a

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MONDALE

12 AM 10: 48

Charles N. Steele
General Counsel
Federal Election Commission
1325 K Street
Washington, D.C., 20007



BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Mondale for President Committee, et al.	)	MURs 1667 and 1704
	)	

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of June 12, 1984, do hereby certify that the Commission took the following actions with respect to the above-captioned matter:

1. Decided by a vote of 5-1 to direct the FEC Reports Analysis Division to send letters to those unregistered delegate groups listed on Chart II of the General Counsel's report dated June 6, 1984, that have apparently received $1,000 or more, that they may be required to register with the Federal Election Commission.

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

(Continued)

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2. Decided by a vote of 6-0 to

a) not nofify, at this time, the unregistered delegate groups that have not been mentioned by the complainant of the complaint and its supplements in MUR 1667; and

b) not notify, at this time, the unregistered delegate groups that have not been mentioned by the complainant of the complaint in MUR 1704.

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

Attest:

6-12-84
Date

Marjorie W. Emmons
Secretary of the Commission

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE, GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/ JODY C. RANSOM

DATE: JUNE 7, 1984

SUBJECT: ADDITIONAL OBJECTION - MUR 1667/1704
Memorandum to the Commission
(re: Memo from RAD) dated 6-6-84

The above-named document was circulated to the Commission on Wednesday, June 6, 1984 at 11:00.

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

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

This matter will be placed on the Executive Session agenda for Tuesday, June 12, 1984.

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FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

MEMORANDUM TO: CHARLES STEELE, GENERAL COUNSEL

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

DATE: JUNE 7, 1984

SUBJECT: OBJECTION - MUR 1667 - MEMORANDUM TO THE COMMISSION (RE: MEMO FROM RAD) dated June 6, 1984

The above-named document was circulated to the Commission on Wednesday, June 6, 1984 at 11:00.

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

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

This matter will be placed on the Executive Session agenda for Tuesday, June 12, 1984.

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RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

84 JUN 6 A8:51

June 6, 1984

SENSITIVE

MEMORANDUM TO: The Commission

FROM: Charles N. Steele
General Counsel

SUBJECT: Memorandum From the Reports Analysis Division
MURs 1667 and 1704

On May 29, 1984, the Reports Analysis Division (RAD) forwarded the attached memorandum to the Office of the General Counsel. RAD indicated in the memorandum that it has reviewed reports of receipts and disbursements filed by union political action committees and has identified 12 unregistered delegate groups that may have registration and reporting obligations. (The information provided by RAD indicates that four of these groups have received less than $1,000.)

On May 8, 1984, the Commission voted to notify all Mondale delegate committees registered with the Commission as of that date of the complaint and supplements filed in MUR 1667. As they do not fall within that category, the groups identified by RAD have not been notified of the complaint and the supplements in MUR 1667. This Office is of the opinion that the Commission should not now include as respondents unregistered delegate groups that have not been mentioned by the complainant. The Office of the General Counsel recommends, therefore, that unregistered delegate groups that have not been mentioned by the complainant not be notified of the complaint and its supplements in MUR 1667.

The complaint filed in MUR 1704 also contains allegations concerning the Mondale delegate committee.

This Office makes the same recommendation concerning notification of unregistered Mondale delegate committees with regard to MUR 1704.

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Recommendations

1. Do not notify unregistered delegate groups that have not been mentioned by the complainant of the complaint and its supplements in MUR 1667.

2. Do not notify unregistered delegate groups that have not been mentioned by the complainant of the complaint in MUR 1704.

Attachment
Memorandum from RAD

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0-84-42

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 29, 1984

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

ATTENTION: STEPHEN MIMS

THROUGH: JOHN C. SURINA
STAFF DIRECTOR

FROM: JOHN D. GIBSON
ASSISTANT STAFF DIRECTOR
REPORTS ANALYSIS DIVISION

SUBJECT: DELEGATE COMMITTEE INFORMATION

Attached are two charts containing additional information on delegate committees. Pursuant to your request, Chart II has been expanded to include the addresses of the unregistered committees as well as a breakdown of the contributions made to them. If you have any questions regarding these charts, please let me know.

Attachment

Attachment 1

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CHART II
POTENTIAL UNREGISTERED DELEGATE COMMITTEES
FROM SELECTED PAC REPORTS

Recipient	Contributions	Amount
-NY - The Mondale Team (32nd C.D.) 504 Witmar Road N. Tonawanda, NY 14120	AFSCME-PEOPLE AFT-COPE CWA-COPE	$1,215 $3,000 $ 500
-NY - 18th C.D. Delegate Committee for Mondale 888 Grand Concourse Bronx, NY 10451	AFSCME-PEOPLE AFSCME-PEOPLE	$ 350 $ 50
-NY - 15th C.D. Delegates Coalition for Mondale 235 East 87th Street New York, NY 10028	AFSCME-PEOPLE AFSCME-PEOPLE AFT-COPE	$ 960 $ 750 $ 750
-FL - C.D. 6 Delegates for Mondale 2375 S.W. College Road Ocala, FL 32674	AFT-COPE	$ 500
-FL - C.D. 11 Delegates for Mondale 981 Church Street Rockledge, FL 32955	AFT-COPE	$ 500
-MA - 6th District Delegate for Mondale c/o John G. VonDusen 38 Pond Street Marble Head, MA 01948	SEIU-COPE	$ 500
-OH - Ohio Mondale at Large Delegates State Committee Robert Malone, Treasurer 409 Brentwood Drive Marion, OH 43302	SEIU-COPE	$2,500
-PA - 15th C.D. Delegates for Mondale 4095 Tilghman Street Allentown, PA 18104	UAW V-CAP PA - At Large Delegates for Mondale	$ 500 $1,000

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Recipient	Contributions	Amount
-VA - Mondale 2nd C.D. Delegate Recruitment Committee Pauline Davis, Treasurer 1007 Kempsville Road Virginia Beach, VA 23464	UPCW Active Ballot Club	$5,000
-PR - Delegates Committee With Mondale P.O. Box 4029 San Juan, PR 00905	AFL-CIO COPE	$5,000
-NY - West New York Elect Mondale Committee - 31st C.D. 201 Presidel Place Williamsville, NY 14221	AFT-COPE	$3,000
-MO - Western Missouri Mondale Delegate Committee 8037 Teasdale St. Louis, MO 63130	UAW V-CAP	$2,500

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CHART III
DELEGATE COMMITTEE CONTRIBUTIONS

This is a listing of those committees that have made contributions to delegate committees and have not been disclosed on delegate committee reports.

Listed are:

- The name and identification number of each PAC making these contributions.
- The total amount of contributions reported received on the delegate committee reports. (See Chart I.)
- The amount of additional contributions made by the listed PAC as reported on their disbursement schedules (but not reported on delegate committee receipt schedules).

The column "Additional Contributions From PAC Schedule B's" was determined by checking those contributions reported as having been received on delegate committee reports against the corresponding PAC report. PAC contributions that were not found received on any delegate committee report were flagged and totalled per each PAC making such additional unreported contributions.

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CHART III

DELEGATE COMMITTEE* CONTRIBUTIONS

Name	I.D. Number	Total From Delegate Committee Schedule A's Thru 5/8/84	Additional Contributions From PAC Schedule B's	Total Net Contribution
AFSCME-PEOPLE	C00011114	$50,270.00	$17,570.00	$67,840.00
UAW V-CAP	C00002840	$34,682.26	$22,000.00	$56,682.26
AFT-COPE	C00028860	$32,651.60	$20,850.00	$53,501.60
CWA-COPE	C00002089	$31,500.00	$ 500.00	$32,000.00
United Mine Workers of America PAC	C00013342	$20,000.00	$10,000.00	$30,000.00
UFCW-Active Ballot Club	C00002766	$ 5,000.00	$22,000.00	$27,000.00
SEIU-COPE	C00004036	$16,705.58	$ 3,000.00	$19,705.58
AFL-CIO COPE	C00003806	$13,636.64	$ 5,000.00	$18,636.64
Engineers Political Education Committee	C00029504	$ 5,000.00	$10,500.00	$15,500.00
Ironworkers Political Action League	C00027359	$ 5,000.00	$ 6,150.00	$11,150.00
Bricklayers and Allied Craftsmen	C00003632	$ 7,500.00	$ 3,000.00	$10,500.00
Machinists Non-Partisan Political League	C00002469	$ 7,400.00	$ 1,000.00	$ 8,400.00
IUOE Local 17 PAC	C00104455	$ 50.00	$ 50.00	$ 100.00

*These include the 130 registered delegate committees listed as respondents and the unregistered delegate committees listed on Chart II.

BEFORE THE FEDERAL ELECTION COMMISSION

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

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of June 12, 1984, do hereby certify that the Commission decided by a vote of 6-0 to direct the Office of General Counsel to write to the Mondale for President Committee, Inc., regarding their request on a portion of Section 12 of the Interrogatories and Sections 17 and 18 on the Commission's Request for Documents advising them that for the time being the Commission is neither accepting nor denying their formal request in the hope that the Committee and the Commission can work out an accommodation concerning the requested materials. Accordingly, the Commission accepts the respondents' offer to provide the pertinent materials, and requests that they advise us in writing within five days of receipt of our letter, informing us whether they plan to submit the materials, and if so, the approximate date when the Commission would receive these materials.

(Continued)

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

Attest:

6-13-84
Date

Marjorie W. Emmons
Secretary of the Commission

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RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

84 JUN 11 P5: 50

Submitted Late

SENSITIVE

June 11, 1984

EXECUTIVE SESSION
JUN 12 1984

MEMORANDUM

TO: The Commission

FROM: Charles N. Steele CNS/kmw
General Counsel

SUBJECT: MUR 1667
Subpoena and Order Issued

The attached document is submitted late in that the Commission approved subpoenas directed to Mondale for President are returnable on Wednesday, June 13, 1984. Thus, the Commission should take up this matter at its Executive Session of June 12, 1984.

Attachment

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: The Commission

FROM: Charles N. Steele
General Counsel

SUBJECT: Subpoena and Order Issued in MUR 1667

On May 23, 1984, the Commission issued a Subpoena and Order to the Mondale for President Committee, Inc., and Michael S. Berman, as treasurer (both respondents are hereinafter collectively referred to as "MPC"). MPC's response is due by June 13, 1984.

On June 5, 1984, the Office of the General Counsel, received a Motion to Modify Subpoena and Order to Answer Interrogatories from MPC. MPC asserts both general objections to the subpoena and order and enumerates specific objections. MPC reiterates its willingness to cooperate with the Commission's investigation, but urges the Commission to keep in mind the "delicate nature of the materials" sought in this investigation while considering MPC's motion. Finally, MPC requests an extension of time of 30 days in which to comply with the subpoena and order.

Prior to addressing MPC's specific objection, the Office of the General Counsel proposes some general comments regarding this matter. MPC has expressed some concern that the interrogatories and requests for documents are overbroad. This Office prepared these requests in such a manner as to limit their scope to the issues presently before the Commission. As stated in their definitional sections the subpoena and order were specifically designed not to go beyond the questions regarding the affiliation between MPC and the delegate committees.

The Office of the General Counsel also notes that the questions are designed to discover evidence that will be reasonably related to the Commission's inquiry. Some of the questions to MPC ask it to provide information that it contends is already in the possession of the Commission; because of this, MPC contends it is under no legal obligation to supply the information. Although this Office believes there is merit to MPC's contention on this point, we believe the Commission should

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not strike such requests, but rather explain to MPC in a letter that MPC's decision to supply the material will lead to a quicker resolution of this matter than would be otherwise possible - a goal both parties have adopted.

This Office has prepared a draft letter for the Commission's approval that sets forth the Commission's decision on each motion made by MPC and sets forth a short explanation for each decision, that reflects the discussion and recommendations below.

A. MPC's objections to the interrogatories

(1)(b) MPC objects to the request for information concerning "strategic assistance" in forming the delegate committees as being vague and overbroad. MPC believes the request could be construed as "covering the content of MPC's political communications and expression."

MPC's request ignores the limitation imposed upon the question by the introductory language of the subpoena and order immediately preceeding the "Definitions and Requests." That language limits the scope of the Commission's inquiry to the issue of MPC's affiliation with the Mondale Delegate Committees. Further, the proposed letter to MPC indicates the question does not seek information concerning the political beliefs of the delegates, but rather seeks information about MPC's role in such areas as advising delegates whether to establish delegate committees and the best way to set them up. In view of the limited scope of the inquiry and the explanatory language in the proposed letter, the Office of the General Counsel believes the question, as limited, is appropriate because it seeks information reasonably related to the issue of affiliation without interfering with the First Amendment rights of MPC and its delegates.

(5)(b) The same objections are presented here by MPC as in (1)(b). The Office of the General Counsel reiterates its response to (1)(b).

(5)(d) MPC objects to the request for information concerning "assistance in the preparation of campaign materials," contending that such coordination in the preparation of campaign materials" is permitted under 11 C.F.R. § 110.14(d)(2)(i)."

With respect to that argument, this Office first notes that Section 110.14(d)(2)(i) (the "coattails" provision) does not specifically address the degree to which a delegate committee may coordinate such expenditures with a presidential candidate. Assuming unlimited coordination is permitted, however, the Office of the General Counsel believes the question is still a

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legitimate inquiry because it seeks information concerning the degree of overall coordination between MPC and the delegate committees. Even though coordination of campaign materials alone may not constitute proof of affiliation, information about such activity and the degree to which it occurred, when viewed along with other evidence, is reasonably related to the Commission's determination of whether MPC established, financed, maintained and controlled the delegate committees.

MPC further contends that evidence of coordinating the preparation of campaign materials is not an indicia of affiliation. Section 110.3(a)(1)(iii) sets forth criteria that may be applied to committees (such as the delegate committees and MPC) in determining whether they are affiliated. The criteria set forth in this section are not intended to be exhaustive; they are merely illustrative of the kinds of evidence that the Commission might consider in determining whether committees are affiliated. In addition, although the information sought may not be directly indicative of the specific indicia provided in the Regulations, it may, when considered with other evidence, go to proving one or more of the listed indicia. The Office of the General Counsel believes such evidence would be properly considered by the Commission together with all other available evidence in determining whether MPC had the authority, power, or ability to direct the delegate committees or to otherwise influence the decision of the officers or members of the delegate committees. Thus, as has been previously noted, in the context of the limited scope of the Commission's inquiry into the question of affiliation, the Office of the General Counsel believes the question is appropriate.

10. MPC proposes that the scope of this question be limited to "officers or members" of a delegate committee because "the reasons why volunteers or staff of delegate committees chose to support the activities of particular committees is at the heart of the activity protected by the First Amendment." The General Counsel's Office notes that the question relates to activity engaged in by MPC in assisting any delegate committee in obtaining paid staff and volunteers. As indicated in the proposed letter the question posed in the interrogatory does not concern an individual's decision to support a delegate committee, but, rather, concerns efforts by MPC to direct, control or otherwise influence the delegate committees. The Office of the General Counsel believes, therefore, that the question as it relates to the issues of affiliation is proper as it does not focus upon the political beliefs of individuals who engaged in volunteer activities and is carefully tailored to avoid intrusion by the FEC into citizen participation in grass-roots activities.

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11. MPC proposed that this interrogatory be stricken arguing that the word "services" is vague and that interrogatories 10 and 13 would answer the question. The Office of the General Counsel notes that the effect of question 10 is to identify efforts by MPC to staff the delegate committees with individuals who had not provided MPC with services while this question requests MPC to identify efforts to staff the delegate committees with persons who had performed services to MPC. The questions are mutually exclusive. The Office of the General Counsel believes both questions are carefully tailored to elicit information reasonably related to the affiliation issues that are the subject matter of this investigation. Question 11 seeks to identify those instances in which MPC suggested, directed or referred individuals who had performed services for MPCto a delegate committee. Such evidence is relevant in determining whether MPC and the delegate committees are affiliated and might lead to other evidence that relates to that issue. In order to further clarify the question, the proposed letter indicates that the phrase to which MPC has stated an objection, "performing services" ... should be read to exclude communications relating to any necessary efforts by an individual delegate to become authorized by Mr. Mondale to be on a ballot.

12. MPC contends this interrogatory should be stricken because the phrase "performed services" is vague and because it seeks information not in the possesion of MPC. MPC further contends that information concerning "persons who received payment from MPC and from a delegate committee is already in the possession of the Commission, in the reports filed by the committees.

The General Counsel's Office answers MPC's objection to the phrase "performing services" with the same explanation as made in question 11, above. In the event that such information is not in MPC's possession or control, this Office would expect that MPC would supply what information it had in order to comply with the Commission's request. This Office also notes that MPC's response to this question should be tailored to the issue before the Commission regarding the possible affliation between MPC and any delegate committee, thus including only the identification of such persons who performed services for a delegate committee at the suggestion or direction of MPC. This question also includes the identification of such persons whether paid or not.

Although technically MPC is correct that the Commission cannot require it to produce information already in the Commission's possession, this Office does not recommend that the question be stricken. The information requested by the Commission is in the reports filed by MPC and the delegate committees; however, the information is not presently in a form

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that would facilitate the expeditious handling of this matter. For example, in the event that MPC made a payment to a person from its draft account (see discussion of this account in MPC's motion to modify Subpoena and Order at 9), MPC's reports filed with the Commission reflect those payments in the order they were made. Because MPC does not alphabetize its expenditures schedule reflecting these disbursements, extensive Commission resources would be required to identify these individuals. Thus, even though Commission staff might be able to identify such persons, the relevancy of the information, without some information linking their services to the delegate committees at the behest of MPC, would be questionable at best. Furthermore, MPC has indicated a willingness to cooperate fully with the Commission's investigation. In light of that willingness and the difficulty in culling the information from the reports, this Office recommends this request for information not be stricken.

13. MPC requests that this interrogatory also be stricken. The question asks that MPC identify any vendors that it suggested be used by any delegate committee. The question is directed towards obtaining evidence that would be useful in the Commission's efforts to determine the extent to which MPC may have maintained any direction and/or control over the delegate committees. MPC contends, however, that the question would be relevant only in the context of an independent expenditure analysis and that "there is no statutory or regulatory basis for considering common vendors as indicative of affiliation."

Section 110.3(a)(1)(iii) sets forth the criteria that may be applied to committees (such as the delegate committees and MPC) in determining whether they are affiliated. The criteria set forth in this section are not intended to be exhaustive; they are merely illustrative of the kinds of evidence that the Commission might consider in determining whether committees are affiliated. In any event, although the information sought may not be directly indicative of the specific indicia provided in the Regulations, it may, when considered with the other evidence, go to proving one or more of the listed indicia. This Office believes, therefore, that the question as posed by the Commission is appropriate.

16, 17, 18. MPC asserts the same objections to these 3 interrogatories as it set forth regarding question (5)(d), above. The Office of the General Counsel reiterates its explanation in (5)(d) for these questions noting, again, that the purpose for these question is not to delve into areas regarding the political content of the literature but, rather, to determine the degree of independence of the delegate committees from MPC, as evidence regarding the question of affiliation. Thus, this Office believes questions 16, 17, and 18 are appropriate in that they are relevant to the subject matter of the Commission's inquiry.

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B. MPC's Objections to the request for documents

11, 12. MPC moves to modify these requests to pertain only to "officers or members" of a delegate committee for the same reasons it set forth as to Interrogatory number 10. In its objection to Interrogatory number 10, MPC asserted that "the reasons why volunteers or staff support the activities of particular committees is at the heart of the activity protected by the First Amendment." The Office of the General Counsel reiterates its response to Interrogatory number 10. In addition, we note that the documents would be limited by the scope of this inquiry to those documents relating to efforts undertaken by MPC to arrange for or recommend certain identified individuals to staff the delegate committee, either in paid or volunteer positions. Thus the request does not go to an individual's decision to support a committee, but rather, goes to MPC's efforts to assist in the maintenance, direction and control of a delegate committee. The Office of the General Counsel believes, therefore, that in light of the Commission's stated narrowly defined inquiry, the requests for these documents are appropriate.

16. MPC's motion to strike this request is explained by the rationale set forth covering Interrogatories numbers 16, 17 and 18. The Office of the General Counsel incorporates its comments to those interrogatories as its response to this motion and recommends, therefore, that the motion be denied.

17,18. MPC urges the Commission to reconsider its two requests for machine-readable information. MPC contends that the Commission could not require the committee to produce this material as the information requested is "already in possession of the Commission."

As noted in an earlier discussion (see Interrogatory 12, above), the information that is contained within MPC's disclosure reports is not in a form that facilitates the Commission's efforts in this matter.

MPC indicates that it believes production of machine-readable information will not assist the Commission due to the need to create a program (not presently in existence) to sort the data in a form that would be usable. The Office of the General Counsel believes this material is needed in order to determine the degree to which the delegate committees and MPC coordinated their activities as evidenced by payments to common individuals and vendors. This Office has discussed the matter with appropriate Commission personnel and has been advised that the information provided by MPC could be sorted in a manner that would be usable in the Commission's inquiry. As MPC has

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indicated a willingness to cooperate fully with the Commission's investigation and as it would be less burdensome for Commission staff to sort the needed information from the MPC tapes, this Office recommends that the Commission not modify its request for the documents and materials requested in numbers 17 and 18.

B. Request for extension of time

MPC's response to the subpoena and order is due by June 13, 1984. Although MPC indicates that it expects to be able to supply the Commission with the majority of the requested documents and materials by that date, it indicates that additional time is needed to respond to the interrogatories. MPC insists that it is in the process of obtaining the information requested by the Commission as expeditiously as possible. MPC raises additional concerns regarding the need to contact staff and other personnel that are presently located around the country. MPC contends that without an extension of time, it would not be able to provide the Commission with complete answers to the Commission's questions. The Office of the General Counsel agrees that the information requested is specific and detailed and it may take some time for MPC to coordinate and compile the responses. This Office also notes that MPC has continually exhibited a willingness to cooperate in this matter. The Office of the General Counsel believes, therefore, that the Commission's interest would best be served by granting the requested extension of 30 days in which to respond to the interrogatories and to complete the document production.

Recommendations

1. Do no grant the motion to modify or strike interrogatory numbers (1)(b), (5)(b), (5)(d), 10, 11, 12, 13, 16, 17 and 18.

2. Do not grant the motion to modify or strike the request for document production numbers 11, 12, 16, 17 and 18.

3. Grant the Mondale for President Committee, Inc., and Michael S. Berman, as treasurer, a 30 day extension of time to respond to the Interrogatories and to complete the document production requests contained in the subpoena and order issued by the Commission on May 23, 1984, making such response due on July 13, 1984.

Attachment

Proposed letter

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

David Ifshin, Esquire
Carolyn Oliphant, Esquire
Mondale for President Committee, Inc.
2001 Wisconsin Avenue, N.W.
Washington, D.C. 20007

Dear Mr. Ifshin and Ms. Oliphant:

This responds to your motion to modify Subpoena and Order to Answer Interrogatories filed by you with the Commission on June 5, 1984. The Commission has considered your motion and on June , 1984, voted to take the following actions regarding your motion.

Before addressing your specific concerns, the Commission has some comments regarding your general concerns with the requests for information. With respect to your concern that the interrogatories and requests for documents are overbroad, we note that the Commission issued the subpoena and order with the intention that they be limited in scope. As indicated in their definitional sections, the subpoena and order seek only information concerning the issue of affiliation between the Mondale for President Committee, Inc. (MPC) and the Mondale delegate committees. All questions and requests for information are limited by those definitional sections and all responses should be made with that limited scope in mind. Furthermore, the Commission believes its questions and requests for are relevant to the inquiry before it and are intended to discover evidence reasonably related to the Commission's investigation.

Although the Commission agrees with MPC's assertion that certain requested information may be contained within reports already filed with the Commission by MPC and the delegate committees, it believes such information is not in a form that would enable it to resolve this matter in an expeditious manner. The Commission would hope, therefore, that MPC will continue to facilitate this investigation by cooperating to the fullest extent.

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With the foregoing comments in mind, the Commission offers its decision and rationale for each motion by MPC:

A. The Interrogatories

(1)(b) and (5)(b). Motions denied. The Commission believes the Interrogatory is not overbroad nor does it believe the request regarding "strategic assistance" provided by MPC in forming delegate committees is vague. The Commission's interest in this question does not go to the actual content of political communications and expressions but, rather, the efforts exerted by MPC to provide such assistance in the forming of the delegate committees as would be required to show the presence or lack of any indicia of affiliation.

(5)(d). Motion denied. The Commission notes that your objection is based upon a conclusion of law that it does not believe has been pronounced. Furthermore, the Commission is not limited to using specific indicia of affiliation when considering this issues. The Commission's Regulations at 11 C.F.R. § 110.14(d)(2)(i) set forth certain criteria that may include those listed; the list is not, therefore, exhaustive of all the elements that may be presented where the Commission determines political committees to be affiliated. Finally, as previously noted, where the evidence leads to evidence that will be reasonably related to the Commission's effort in making a determination.

10. Motion denied. This question is limited to avoid the concerns expressed by MPC; it relates only to activity engaged in by MPC in assisting any delegate committee to obtain either paid or unpaid staff. Thus, the Commission does not agree that the question should be limited in scope to "officers or members" of a delegate committee.

11. Motion denied. You proposed that this interrogatory be stricken arguing that the word "services" is vague and that interrogatories 10 and 13 would answer the question. The Commission notes that the effect of question 10 is to identify efforts by MPC to staff the delegate committees with individuals who had not provided MPC with services while this question requests MPC to identify efforts to staff the delegate committees with persons who had performed services to MPC. The questions are mutually exclusive. Question 13, on the other hand, asks MPC to identify vendors which it recommended to the delegate committees. The Commission believes the questions are carefully tailored to the affiliation issues that are the subject matter of

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this investigation. This question is intended to identify those instances in which MPC suggested, directed or referred to a delegate committee, individuals who had performed services for MPC. The phrase to which MPC has stated an objection, "performing services" ... should be read to exclude communications relating to any necessary efforts by an individual delegate to become authorized by Mr. Mondale to be on a ballot.

12. Motion denied The Commission acknowledges that some of the requested information may already be in its possession. The Commission hopes, however, that MPC will supply the information in order to assist it in accommodating the interests of the parties to this matter by resolving it as expeditiously as possible.

The Commission answers MPC's objection to the phrase "performing services" with the same explanation as made in question 11, above. In the event that such information is not in MPC's possession or control, the Commission would expect that MPC would supply what information it had in order to comply with the Commission's request. The Commission also notes that MPC's response to this question would be tailored to the issue before it regarding the possible affiliation between MPC and any delegate committee, thus including only the identification of such persons who performed services for a delegate committee at the suggestion or direction of MPC. This question also includes the identification of such persons whether paid or not.

13. Motion denied. The question asks that MPC identify any vendors that it suggested be used by any delegate committee. The question is directed towards obtaining evidence that would be useful in the Commission's efforts to determine the extent to which MPC may have maintained any direction and/or control over the delegate committees. MPC's contention is, however, that the question would be relevant only in the context of an independent expenditure analysis and that "there is no statutory or regulatory basis for considering common vendors as indicative of affiliation." Section 110.3(a)(1)(iii) sets forth the criteria that may be applied to committees (such as the delegate committees and MPC) in determining whether they are affiliated. The criteria set forth in this section were not intended to be exhaustive; they are merely illustrative of the kinds of evidence that might be considered by the Commission in determining wheter committees are affiliated. In any event, evidence may be obtained that, while not directly related to the specific indicia provided in the Regulations, might go to proving one or more of the listed indicia when considered with the other evidence. The question is not directed exclusively to common vendors, it is directed, as previously noted, to obtaining evidence that, when

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considered with the rest of the evidence, will be relevant to the subject matter (i.e., affiliation) of the Commission's investigation.

16,17,18. Motions denied. The grounds stated by MPC in support of its motions to these questions are the same as those of its motions to Interrogatory (5)(d), above. The Commission, incorporating its comments to Interrogatory (5)(d) further notes that the purpose of these questions is not to delve in areas regarding the political content of campaign literature but, rather, to determine the independence of the delegate committees from MPC, as evidence concerning the question of affiliation.

B. The Requests for Documents

11,12. Motion denied. The Commission, noting its comments to Interrogatory 10, believes that the scope of its inquiry (as limited to the question of affiliation) avoids questions concerning the subjective intent of individuals' efforts on behalf of a committee. Because the question turns upon MPC's efforts to assit in the direction, maintainence and control of the delegate committees, by MPC, it avoids those concerns that you have expressed.

16. Motion denied. Your objections to this request were previously noted with regard to Interrogatories 16, 17 and 18. The Commission incorporates its rationale expressed for its position with respect to those questions.

17,18. Motion denied. As previously noted, the Commission agrees that some of the information requested by the subpoena and order may be in the possession of the Commission in reports filed by MPC. As MPC is aware, however, the information is not in a form that would facilitate the efforts of the Commission in concluding this matter. The Commission is aware if MPC's efforts to cooperate and hopes that it will continue to do so. The Commission will be able to use the information and access to the requested machine-readable material will assist the Commission in resolving this matter.

C. Requests for Extension of Time

The Commission has reviewed your request for a 30 day extension to respond to the interrogatories issued with the subpoena and order on May 23, 1984. The Commission has

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considered the magnitude of its requests, the circumstances you have described, and MPC's willingness to cooperate in this matter in deciding to grant you the requested extension. Your response should be filed on July 3, 1984.

In the event that you have any questions, please contact Stephen Mims, the attorney assigned to this matter at 523-4143.

Sincerely,

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 8, 1984

Kirk D. Messmer, Esquire
Miller, Canfield, Paddock and Stone
Suite 900
One Michigan Avenue
Lansing, Michigan 48933

Re: MUR 1667
Sixth District Delegates for
Mondale Committee

Dear Mr. Messmer:

This responds to your letter of May 30, 1984, wherein you requested an extension of time to file a response to the complaint and its supplements in the above-captioned matter. The Commission has considered your request and on June 7 , 1984, voted not to grant an extension of time.

If you have any questions, please contact Stephen Mims at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 1667
	)	
Request for Extension - Sixth District Delegates for Mondale Committee (MI)	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on June 7, 1984, the Commission decided by a vote of 4-1 to take the following actions in MUR 1667:

1. Deny the request by the Sixth District Delegates for Mondale Committee (MI) for an extension of time to respond to the complaint in MUR 1667.

2. Approve and send the letter attached to the General Counsel's June 6, 1984 Memorandum to the Commission.

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

Attest:

6-7-84
Date

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

Received in Office of Commission Secretary: 6-6-84, 8:51
Circulated on 48 hour tally basis: 6-6-84, 11:00

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

84 JUN 6 A8: 51

June 6, 1984

SENSITIVE

MEMORANDUM TO: The Commission

FROM: Charles N. Steele
General Counsel

SUBJECT: Request for extensions in MUR 1667

The Office of the General Counsel has received an additional request for an extension of time to respond to the complaint in MUR 1667 from a delegate committee. This Office does not believe that the basis cited in the request justifies approval by the Commission.

Recommendations

1. Deny the request by the Sixth District Delegates for Mondale Committee (MI) for an extension of time to respond to the complaint in MUR 1667.

2. Approve and send the attached letter.

Attachments
1. Request for extension from the Sixth District Delegates for Mondale Committee (MI).

2. Proposed letter.

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RECEIVED AT THE FEC
84 JUN 4 A9:09

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) 482-4955

DETROIT, MICHIGAN
BIRMINGHAM, MICHIGAN
BOCA RATON, FLORIDA
GRAND RAPIDS, MICHIGAN
HOWARD, 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

Attachment 1
Page 1

KDM:a

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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

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Attachment 1
Page 2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Kirk D. Messmer, Esquire
Miller, Canfield, Paddock and Stone
Suite 900
One Michigan Avenue
Lansing, Michigan 48933

Re: MUR 1667
Sixth District Delegates for
Mondale Committee

Dear Mr. Messmer:

This responds to your letter of May 30, 1984, wherein you requested an extension of time to file a response to the complaint and its supplements in the above-captioned matter. The Commission has considered your request and on June , 1984, voted not to grant an extension of time.

If you have any questions, please contact Stephen Mims at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

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Attachment 2

O-84-44
MRN

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 7, 1984

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

ATTENTION: STEPHEN MIMS

THROUGH: JOHN C. SURINA
STAFF DIRECTOR

FROM: JOHN D. GIBSON
ASSISTANT STAFF DIRECTOR
REPORTS ANALYSIS DIVISION

SUBJECT: DELEGATE COMMITTEE INFORMATION - BACK-UP

Attached is back-up information for Charts I and III which were supplied to you on May 25 and May 29. Should you have any questions, please let me know.

Attachment

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AFSCME - PEOPLE
C00011114

RECIPIENT	IDENTIFICATION	AMOUNT
DC - Mondale Delegates - DC	C00182550	$ 1,000.00
FL - C.D. 2 Delegates for Mondale, FL	C00177873	$ 1,000.00
FL - C.D. 5 Delegates for Mondale	C00178707	$ 1,000.00
FL - C.D. 7 Delegates for Mondale	C00178947	$ 1,000.00
FL - Delegates for Mondale	C00178509	$ 2,000.00
FL - Mondale 16TH District Delegate Committee	C00175950	$ 2,000.00
FL - Mondale Delegates, C.D. 13	C00179440	$ 1,000.00
FL - South Florida Delegates for Mondale	C00176875	$ 5,000.00
IL - 15TH District Delegates for Mondale	C00177238	$ 1,000.00*
IL - Eleventh District Mondale Delegate Committee	C00175828	$ 1,000.00
IL - Ninth District Mondale Delegate Committee	C00176180	$ 2,000.00
IL - Third Congressional District Delegates for Mondale	C00178715	$ 2,000.00
NH - NH 1ST District Delegates for Mondale	C00176909	$ 5,000.00
NY - 6TH C.D. Delegates for Mondale	C00179887	$ 1,910.00
NY - At-Large Delegates for Mondale	C00181016	$ 5,000.00
NY - Mondale 17TH C.D. Delegate Committee	C00176883	$ 860.00
PA - 21ST Congressional 1984 Delegates for Mondale	C00179457	$ 1,500.00
PA - Delegates At-Large for Mondale	C00180679	$ 5,000.00
PA - Second Congressional District Delegates for Mondale	C00178319	$ 1,000.00
RI - 1ST and 2ND District Delegate Committee(s) for Mondale	C00177246	$ 2,500.00
RI - 1ST and 2ND District Delegate Committee(s) for Mondale	C00177808	$ 2,500.00
WI - Wisconsin At-Large Delegate Mondale Committee	C00180687	$ 5,000.00
	Chart I Sub-Total	$50,270.00

*Different Amounts Reported by PAC and Delegate Committee (Delegate Committee Amount Reflected)

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AFSCME-PEOPLE CON'T

RECIPIENT	IDENTIFICATION	AMOUNT
NY - 11TH C.D. Delegates for Mondale	C00181115	$ 510.00
NY - 9TH C.D. Delegates for Mondale	C00179895	$ 375.00
NY - 8TH C.D. Delegates for Mondale	C00180224	$ 110.00
NY - 7TH C.D. Delegates for Mondale	C00179861	$ 45.00
NY - Long Island Mondale 4TH C.D.	C00181396	$ 2,055.00
NY - North Country Delegates for Mondale (26TH C.D.)	C00181107	$ 1,210.00
NY - The Mondale Team (32ND C.D.)	Not Registered	$ 1,215.00
NY - Southern Tier Committee for Mondale (34TH C.D.)	C00182329	$ 500.00
NY - 19TH C.D. Delegate Committee for Mondale	C00182899	$ 925.00
NY - 18TH C.D. Delegate Committee for Mondale	Not Registered	$ 350.00
NY - 15TH C.D. Delegates Coalition for Mondale	Not Registered	$ 960.00
NY - 16TH C.D. Delegates for Mondale	C00181388	$ 335.00
NY - 14TH C.D. Delegates for Mondale	C00181149	$ 355.00
NY - 13TH C.D. Delegates for Mondale	C00181131	$ 15.00
NY - 12TH C.D. Delegates for Mondale	C00181123	$ 510.00
NY - Mondale 19TH C.D. Delegate Committee	C00182899	$ 300.00
NY - Mondale 18TH C.D. Delegate Committee	Not Registered	$ 50.00
NY - Mondale 17TH C.D. Delegate Committee	C00176883	$ 750.00
NY - 15TH C.D. Delegate Coalition for Mondale	Not Registered	$ 750.00
NY - 14TH C.D. Delegates for Mondale	C00181149	$ 250.00
NY - 11TH C.D. Delegates for Mondale	C00181115	$ 250.00
NY - 9TH C.D. Delegates for Mondale	C00179895	$ 250.00
NY - 8TH C.D. Delegates for Mondale	C00180224	$ 500.00
NY - 23RD C.D. Delegates Committee for Mondale	C00180588	$ 845.00
NY - Naples-Mondale for President (23RD C.D.)	C00180216	$ 715.00
NY - Delegates for Mondale 25TH C.D.	C00180414	$ 775.00
NY - Lower Hudson Delegates for Mondale (22ND C.D.)	C00180570	$ 565.00
NY - 16TH C.D. Delegates for Mondale	C00181388	$ 500.00
NY - 12TH C.D. Delegates for Mondale	C00181123	$ 250.00
NH - 2ND C.D. Delegates for Mondale	C00176891	$ 1,350.00
	Chart III Sub-Total	$17,570.00
	TOTAL	$67,840.00

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RECIPIENT	IDENTIFICATION	AMOUNT
IL - 12TH District Mondale Delegate Committee	C00175943	$ 2,000.00
IL - 12TH District Mondale Delegate Committee	C00175943	[$675.50]
IL - 16TH Delegates for Mondale	C00178681	$ 2,000.00
IL - 17TH District Mondale Delegate Committee	C00176925	$ 2,000.00
IL - 17TH District Mondale Delegate Committee	C00176925	[$1,042.24]
IL - 19TH District Delegates for Mondale Committee	C00178673	$ 2,000.00
IL - 20TH C.D. Delegates for Mondale	C00177881	$ 2,000.00
IL - Mondale Delegates for the Illinois 18TH Committee	C00176198	$ 2,000.00
NH - NH 2ND District Delegates for Mondale	C00176891	$ 5,000.00
NY - At-Large Delegates for Mondale	C00181016	$ 5,000.00
PA - Mondale Delegates Committee	C00178137	$ 3,400.00*
PA - 4TH District Delegates for Mondale	C00179846	$ 3,500.00
PA - Delegates At-Large for Mondale	C00180679	$ 5,000.00
WI - 5TH C.D. Mondale Delegate Committee	C00181438	$ 2,500.00
	Chart I Sub-Total	$34,682.26
MI - Sixth District Delegates for Mondale	C00179697	$ 3,000.00
MO - Western Missouri Mondale Delegate Committee (Kansas City)	C00183186	$ 2,500.00
MO - Western Missouri Mondale Delegate Committee (St. Louis)	Not Registered	$ 2,500.00
NY - 16TH C.D. Delegates for Mondale Committee	C00181388	$ 5,000.00
NY - Erie County Delegates for Mondale	C00181305	$ 500.00
PA - 15TH C.D. Delegates for Mondale	Not Registered	$ 500.00
PA - 5TH C.D. Delegates for Mondale	C00181008	$ 500.00
PA - 14TH C.D. Delegates for Mondale	C00180562	$ 5,000.00
WI - Wisconsin At-Large Mondale Delegates Committee	C00180687	$ 2,500.00
	Chart III Sub-Total	$22,000.00
	TOTAL	$56,682.26

*Different Amounts Reported By PAC and Delegate Committee (Delegate Committee Amount Reflected)

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C00028860

RECIPIENT	IDENTIFICATION	AMOUNT
DC - Mondale Delegates - DC	C00182550	$ 500.00
FL - 14TH C.D. For Mondale	C00175810	$ 500.00
FL - C.D. 9 Delegates for Mondale	C00178475	$ 2,000.00
FL - Mondale 15TH District Delegate Committee	C00176644	$ 1,500.00
FL - Northern 12TH C.D. Delegates for Mondale	C00178327	$ 500.00
FL - South Florida Delegates for Mondale	C00176875	$ 2,000.00
IL - 1ST C.D. Delegates for Walter Mondale	C00178236	$ 1,000.00
IL - 7TH C.D. Delegates for Mondale	C00178244	$ 1,500.00
IL - Fourth District Mondale Delegate Committee	C00175596	$ 1,000.00
IL - Second C.D. Delegates for Mondale	C00178251	$ 1,000.00
IL - Sixth District Mondale Delegate Committee	C00177139	$ 1,000.00
IL - Third C.D. Delegates for Mondale	C00178715	$ 1,000.00
MT - Montana At-Large Delegates for Mondale Committee	C00181313	$ 1,000.00
MT - Montana At-Large Delegates for Mondale Committee	C00181313	[$698.40]
NH - NH 1ST District Delegates for Mondale	C00176909	$ 5,000.00
NY - 10TH C.D. Delegates for Mondale	C00181032	$ 500.00
NY - At-Large Delegates for Mondale	C00181016	$ 5,000.00
NY - Mondale 17TH C.D. Delegate Committee	C00176883	$ 750.00
PA - Delegates At-Large for Mondale	C00180679	$ 5,000.00
PA - 14TH C.D. Delegates for Mondale	C00180562	$ 2,000.00
PA - 14TH C.D. Delegates for Mondale	C00180562	$ 50.00
PA - 14TH C.D. Delegates for Mondale	C00180562	$ 50.00
PA - Second C.D. Delegates for Mondale	C00178319	$ 500.00
Chart I Sub-Total		$32,651.60
FL - Delegates for Mondale 3RD C.D.	C00178509	$ 2,000.00
FL - C.D. 6 Delegates for Mondale	Not Registered	$ 500.00
FL - C.D. 11 Delegates for Mondale	Not Registered	$ 500.00
NY - Long Island Mondale 1ST C.D. Delegates	C00181925	$ 2,000.00
NY - Naples-Mondale for President Slate - 24TH C.D.	C00180216	$ 1,300.00

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RECIPIENT	IDENTIFICATION	AMOUNT
NY - 7TH C.D. Delegates for Mondale	C00179861	$ 500.00
NY - 9TH C.D. Delegates for Mondale	C00179895	$ 250.00
NY - Delegates for Mondale - 12TH C.D.	C00181123	$ 250.00
NY - Delegates for Mondale - 11TH C.D.	C00181115	$ 250.00
NY - Delegates for Mondale - 14TH C.D.	C00181149	$ 250.00
NY - 15TH C.D. Delegates Coalition for Mondale	Not Registered	$ 750.00
NY - Mondale 19TH C.D. Delegates Committee	C00182899	$ 300.00
NY - 28TH C.D. Delegates for Mondale	C00181297	$ 2,000.00
NY - West New York Elect Mondale Committee - 31ST C.D.	Not Registered	$ 3,000.00
NY - Mondale Team - 32ND C.D.	Not Registered	$ 3,000.00
NY - Southern Tier Committee for Mondale (34TH C.D.)	C00182329	$ 1,500.00
PA - Third C.D. Delegates for Mondale Committee	C00180547	$ 1,500.00
PA - Tenth C.D. Delegates for Mondale Committee	C00180141	$ 1,000.00
	Chart III Sub-Total	$20,850.00
	TOTAL	$53,501.60

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C00002089

RECIPIENT	IDENTIFICATION	AMOUNT
FL - C.D. 5 Delegates for Mondale	C00178707	$ 1,000.00
FL - Delegates for Mondale	C00178509	$ 1,000.00
FL - South Florida Delegates for Mondale	C00176875	$ 1,000.00
IL - Second C.D. Delegates for Mondale	C00178251	$ 1,000.00
NH - NH 2ND District Delegates for Mondale	C00176891	$ 5,000.00
NY - At-Large Delegates for Mondale	C00181016	$ 5,000.00
NY - Long Island Mondale Committee	C00182360	$ 2,500.00
PA - Delegates At-Large for Mondale	C00180679	$ 5,000.00
WI - 5TH C.D. Mondale Delegate Committee	C00181438	$ 5,000.00
WI - Wisconsin At-Large Delegate Mondale Committee	C00180687	$ 5,000.00
	Chart I Sub-Total	$31,500.00
NY - The Mondale Team - 32ND C.D.	Not Registered	$ 500.00
	Chart III Sub-Total	$ 500.00
	TOTAL	$32,000.00

8504050121

UNITED MINE WORKERS OF AMERICA PAC
C00013342

RECIPIENT	IDENTIFICATION	AMOUNT
IL - 22ND C.D. Delegates for Mondale	C00177840	$ 200.00
IL - 22ND C.D. Delegates for Mondale	C00177840	$ 4,800.00
NH - NH 2ND District Delegates for Mondale	C00176891	$ 5,000.00
PA - Mondale Delegate Committee 12TH C.D.	C00178954	$ 5,000.00
VA - Mondale 3RD District Delegate Selection Committee	C00182774	$ 5,000.00
	Chart I Sub-Total	$20,000.00
PA - 22ND C.D. Delegates for Mondale	C00180166	$ 5,000.00
KY - Kentucky At-Large Mondale Delegates Committee	C00181024	$ 5,000.00
	Chart III Sub-Total	$10,000.00
	TOTAL	$30,000.00

8504050122

SEIU-COPE
C00004036

RECIPIENT	IDENTIFICATION	AMOUNT
IL - Eleventh District Mondale Delegate Committee	C00175828	$ 1,000.00
IL - Eleventh District Mondale Delegate Committee	C00175828	[$294.42]
MD - Mondale Delegate At-Large Committee for Maryland	C00181974	$ 5,000.00
NY - At-Large Delegates for Mondale	C00181016	$ 5,000.00
PA - Delegates At-Large for Mondale	C00180679	$ 4,000.00
PA - Mondale Delegate Committee - 12TH C.D.	C00178954	$ 1,000.00
PA - Pennsylvania 17TH C.D. Delegates for Mondale	C00180182	$ 1,000.00
	Chart I Sub-Total	$16,705.58
MA - 6TH District Delegate for Mondale	Not Registered	$ 500.00
OH - Ohio Mondale At-Large Delegates State Committee	Not Registered	$ 2,500.00
	Chart III Sub-Total	$ 3,000.00
	TOTAL	$19,705.58

AFL-CIO COPE
C00003806

RECIPIENT	IDENTIFICATION	AMOUNT
DC - Mondale Delegates - DC	C00182550	$ 600.00
FL - Mondale 15TH District Delegate Committee	C00176644	$ 3,000.00
FL - Mondale Delegates C.D. 8	C00178145	$ 1,000.00
FL - South Florida Delegates for Mondale	C00176875	$ 1,000.00
IL - 19TH District Delegates for Mondale Committee	C00178673	$ 3,200.00
IL - 22ND C.D. Delegates for Mondale	C00177840	$ 3,200.00
IL - 17TH District Mondale Delegate Committee	C00176925	$ 3,200.00
IL - 17TH District Mondale Delegate Committee	C00176925	[$1,563.36]
	Chart I Sub-Total	$13,636.64
PR - Delegates Committee With Mondale	Not Registered	$ 5,000.00
	Chart III Sub-Total	$ 5,000.00
	TOTAL	$18,636.64

ILGWU CAMPAIGN COMMITTEE
C00004861

RECIPIENT	IDENTIFICATION	AMOUNT
NH - NH 2ND District Delegates for Mondale	C00176891	$ 5,000.00
NY - L.I. - Mondale 2ND C.D.	C00181727	$ 2,000.00
PA - 4TH District Delegates for Mondale	C00179842	$ 5,000.00
	Chart I TOTAL	$12,000.00

8504050512 3

ACTWU-COPE
C00005728

RECIPIENT	IDENTIFICATION	AMOUNT
IL - 7TH C.D. Delegates for Mondale	C00178244	$ 1,000.00
NH - NH 1ST District Delegates for Mondale	C00176909	$ 5,000.00
NY - At-Large Delegates for Mondale	C00181016	$ 2,500.00
	Chart I TOTAL	$ 8,500.00

BRICKLAYERS AND ALLIED CRAFTSMEN
C00003632

RECIPIENT	IDENTIFICATION	AMOUNT
IL - 7TH C.D. Delegates for Mondale	C00178244	$ 500.00
NH - NH 1ST District Delegates for Mondale	C00176909	$ 5,000.00
PA - Delegates At-Large for Mondale	C00180679	$ 2,000.00
	Chart I Sub-Total	$ 7,500.00
PA - 18TH C.D. Delegates for Mondale	C00180729	$ 3,000.00
	Chart III Sub-Total	$ 3,000.00
	TOTAL	$10,500.00

MACHINISTS NON-PARTISAN POLITICAL LEAGUE
C00002469

RECIPIENT	IDENTIFICATION	AMOUNT
MD - Montgomery County for Mondale Delegate Committee	C00180992	$ 500.00
MD - Montgomery County for Mondale Delegate Committee	C00180992	[$500.00]
NY - At-Large Delegates for Mondale	C00181016	$ 5,000.00
PA - 14TH C.D. Delegates for Mondale	C00180562	$ 2,400.00
	CHart I Sub-Total	$ 7,400.00
NY - Northern NY Delegates for Mondale	C00180190	$ 1,000.00
	Chart III Sub-Total	$ 1,000.00
	TOTAL	$ 8,400.00

8504050121

RECIPIENT	IDENTIFICATION	AMOUNT
IL - Delegates for Mondale Committee - 21ST C.D.	C00176933	$ 1,000.00
PA - Mondale Delegates - 20TH District	C00180737	$ 2,000.00
PA - 4TH District Delegates for Mondale	C00179846	$ 2,000.00
PA - Mondale Delegate Committee - 12TH C.D.	C00178954	$ 2,000.00*
	Chart I TOTAL	$ 7,000.00

CARPENTERS LEGISLATIVE IMPROVEMENT COMMITTEE
C00001016

RECIPIENT	IDENTIFICATION	AMOUNT
FL - South Florida Delegates for Mondale	C00176875	$ 1,000.00
IL - 20TH C.D. Delegates for Mondale	C00177881	$ 5,000.00
	Chart I TOTAL	$ 6,000.00

ENGINEERS POLITICAL EDUCATION COMMITTEE
C00029504

RECIPIENT	IDENTIFICATION	AMOUNT
NY - Erie County Delegates for Mondale	C00181305	$ 5,000.00
	Chart I Sub-Total	$ 5,000.00
NY - 27TH C.D. Delegation for Mondale	C00181586	$ 2,000.00
DC - Mondale Delegates - DC	C00182550	$ 850.00
DC - Mondale Delegates - DC	C00182550	$ 150.00
PA - At-Large Delegates for Mondale	C00180679	$ 3,500.00
PA - 10TH C.D. Delegates for Mondale	C00180141	$ 4,000.00
	Chart III Sub-Total	$10,500.00
	TOTAL	$15,500.00

*Guaranteed Outstanding Contribution (Pledge).

8504050125

RECIPIENT	IDENTIFICATION	AMOUNT
NY - At-Large Delegates for Mondale	C00181016	$ 1,000.00
NY - At-Large Delegates for Mondale	C00181016	$ 1,000.00
NY - At-Large Delegates for Mondale	C00181016	$ 1,000.00
NY - At-Large Delegates for Mondale	C00181016	$ 1,000.00
PA - 21ST Congressional 1984 Delegates for Mondale	C00179457	$ 1,000.00
Chart I Sub-Total		$ 5,000.00
PA At-Large Delegate for Mondale	C00180679	$ 2,000.00
PA - At-Large Delegate for Mondale	C00180679	$ 1,000.00
PA - At-Large Delegate for Mondale	C00180679	$ 1,000.00
PA - At-Large Delegate for Mondale	C00180679	$ 1,000.00
PA - At-Large Delegate for Mondale	C00180679	[$1,000.00]
IL - 3RD C.D. of Illinois Mondale Delegate Committee	C00178715	$ 5,000.00
IL - 3RD C.D. of Illinois Mondale Delegate Committee	C00178715	$ 2,000.00
IL - 3RD C.D. of Illinois Mondale Delegate Committee	C00178715	[$5,000.00]
NY - At-Large Delegate Committee for Mondale	C00181016	$ 1,000.00
NY - At-Large Delegate Committee for Mondale	C00181016	[$1,000.00]
PA - 18TH C.D. of PA Delegate for Mondale	C00180729	$ 150.00
Chart III Sub-Total		$ 6,150.00
TOTAL		$11,150.00

UFCW ACTIVE BALLOT CLUB
C00002766

RECIPIENT	IDENTIFICATION	AMOUNT
NH - NH 2ND District Delegates for Mondale	C00176891	$ 5,000.00
Chart I Sub-Total		$ 5,000.00
VA - Mondale 2ND C.D. Delegate Recruitment Committee	Not Registered	$ 5,000.00
KY - Kentucky At-Large Mondale Committee	C00181024	$ 5,000.00
PA - At-Large Delegates for Mondale Committee	C00180679	$ 5,000.00
NY - State At-Large Delegate Committee for Mondale	C00181016	$ 5,000.00
NY - Committee for Western New York Mondale Delegates	C00180208	$ 2,000.00
Chart III Sub-Total		$22,000.00
TOTAL		$27,000.00

8304051126

ACTWU-COPE (ILLINOIS)
C00026096

RECIPIENT	IDENTIFICATION	AMOUNT
IL - 7TH C.D. Delegates for Mondale	C00178244	$ 4,000.00
	Chart I	

BROWARD FEDERAL SAVINGS AND LOAN PAC (NOT QUALIFIED)
C00136945

RECIPIENT	IDENTIFICATION	AMOUNT
FL - Mondale 15TH District Delegate Committee	C00176644	$ 2,500.00
FL - Mondale 16TH District Delegate Committee	C00175950	$ 1,400.00
	Chart I TOTAL	$ 3,900.00

IBEW LOCAL UNION 915 PAC
C00140749

RECIPIENT	IDENTIFICATION	AMOUNT
FL - C.D. 10 Delegates for Mondale	C00178939	$ 1,000.00
FL - C.D. 7 Delegates for Mondale	C00178947	$ 1,000.00
FL - Mondale Delegates C.D. 8	C00178145	$ 1,000.00
	Chart I TOTAL	$ 3,000.00

8504050127

INDEPENDENT POLITICAL ACTION COMMITTEE (OF BROWARD COUNTY)
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
FL - Mondale 15TH District Delegate Committee	C00176644	$ 500.00
FL - Mondale 16TH District Delegate Committee	C00175950	$ 2,000.00
	Chart I TOTAL	$ 2,500.00

IRONWORKERS LOCAL 397
C00111922

RECIPIENT	IDENTIFICATION	AMOUNT
FL - C.D. 7 Delegates for Mondale	C00178947	$ 1,000.00
FL - C.D. 9 Delegates for Mondale	C00178475	$ 1,000.00
	Chart I TOTAL	$ 2,000.00

ELECTROPAC 728 (IBEW)
C00113225

RECIPIENT	IDENTIFICATION	AMOUNT
FL - Mondale 16TH District Delegate Committee	C00175950	$ 1,700.00

Chart I

8504051128

SOUTH FLORIDA IRONWORKERS 272 PAC
C00133330

RECIPIENT	IDENTIFICATION	AMOUNT
FL - South Florida Delegates for Mondale	C00176875	$ 1,000.00
	Chart I	

UNITED ASSOCIATION 725 PIPEFITTERS AIR-CONDITIONING PAC
C00160507

RECIPIENT	IDENTIFICATION	AMOUNT
FL - Mondale 15TH District Delegate Committee	C00176644	$ 250.00
FL - South Florida Delegates for Mondale	C00176875	$ 500.00
FL - Mondale 16TH District Delegate Committee	C00175950	$ 250.00
	Chart I TOTAL	$ 1,000.00

LOCAL 349 ELECTROPAC FUND (IBEW)
C00136689

RECIPIENT	IDENTIFICATION	AMOUNT
FL - South Florida Delegates for Mondale	C00176875	$ 1,000.00
	Chart I	

8504050127

PLUMBERS LOCAL UNION 519
C00143362

RECIPIENT	IDENTIFICATION	AMOUNT
FL - South Florida Delegates for Mondale	C00176875	$ 1,000.00

Chart I

BAKERY CONFECTIONARY TOBACCO WORKERS PAC
C00127621

RECIPIENT	IDENTIFICATION	AMOUNT
IL - 1ST C.D. Delegates for Walter Mondale	C00178236	$ 1,000.00

Chart I

SUBWAY SURFACE SUPERVISORS PAC
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
NY - Mondale 17TH C.D. Delegate Committee	C00176883	$ 500.00

Chart I

CONSOLIDATED LOCAL UNION 177 OUTSIDE - INSIDE PAC
C00139683

RECIPIENT	IDENTIFICATION	AMOUNT
FL - Delegates for Mondale	C00178509	$ 500.00

Chart I

8504050130

WOMANPOWER CAMPAIGN
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
NY - Mondale 17TH C.D. Delegate Committee	C00176883	$ 500.00

Chart I

CARPENTERS LOCAL 845 PAC
C00152132

RECIPIENT	IDENTIFICATION	AMOUNT
PA - 7TH C.D. Mondale Delegates	C00180398	$ 500.00

Chart I

CARPENTERS DISTRICT COUNCIL OF MADISON
COUNTY AND VICINITY ILLINOIS
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
IL - Delegates for Mondale - 21ST C.D.	C00176933	$ 250.00

Chart I

SEIU - LOCAL 73
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
IL - 1ST C.D. Delegates for Walter Mondale	C00178236	$ 250.00

Chart I

8504050513 1

SPRINGFIELD REGION L.P.L.
C00158071

RECIPIENT	IDENTIFICATION	AMOUNT
IL - 22ND C.D. Delegates for Mondale	C00177840	$ 250.00
	Chart I	

MACHINISTS CREDIT UNION
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
IL - Fourth District Mondale Delegate Committee	C00175596	$ 100.00
IL - Fourth District Mondale Delegate Committee	C00175596	$ 50.00
	Chart I TOTAL	$ 150.00

CARPENTERS AND JOINERS LOCAL 633 TRUSTEES
R AND C FUND
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
IL - Delegates for Mondale - 21ST C.D.	C00176933	$ 100.00
	Chart I	

CARPENTERS LOCAL UNION NO. 377
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
IL - Delegates for Mondale - 21ST C.D.	C00176933	$ 100.00
	Chart I	

8504050132

ENGINEERS POLITICAL ACTION COMMITTEE - IUOE
C00132258

RECIPIENT	IDENTIFICATION	AMOUNT
FL - Northern 12TH C.D. Delegates for Mondale	C00178327	$ 100.00

Chart I

SOUTH CHICAGO RETIRED STEELWORKERS
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
IL - Second C.D. Delegates for Mondale	C00178251	$ 100.00

Chart I

POLITICAL EDUCATION LEGISLATIVE AND CHARITY
FUND LOCAL 27
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
IL - Delegates for Mondale - 21ST C.D.	C00176933	$ 100.00

Chart I

PAINTERS LOCAL 41 SOCIAL CLUB
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
PA - 11TH Congressional Delegates for Mondale	C00178467	$ 100.00

Chart I

8504050133

UNITED LABOR COUNCIL SOCIAL CLUB
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
PA - 11TH Congressional Delegates for Mondale	C00178467	$ 100.00

Chart I

CENTRAL LABOR COUNCIL COPE
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
PA - 21ST Congressional 1984 Delegates for Mondale	C00179457	$ 100.00

Chart I

CENTRAL WESTMORELAND COUNTY LABOR
UNION COUNCIL AFL-CIO
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
PA - Mondale Delegate Committee - 12TH C.D.	C00178954	$ 100.00

Chart I

LOCAL 1357 PAC (UFCW)
(NOT QUALIFIED)
C00177113

RECIPIENT	IDENTIFICATION	AMOUNT
PA - Mondale Delegates Committee	C00178137	$ 100.00

Chart I

8504050513 1

IUOE LOCAL 17 POLITICAL ACTION COMMITTEE
C00104455

RECIPIENT	IDENTIFICATION	AMOUNT
NY - Erie County Delegates for Mondale	C00181305	$ 50.00
	Chart I Sub-Total	$ 50.00
NY - Erie County Delegates for Mondale	C00181305	$ 50.00
	Chart III Sub-Total	$ 50.00
	TOTAL	$ 100.00

SHEETMETAL WORKERS LOCAL 44 PAC
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
PA - 11TH Congressional Delegates for Mondale	C00178467	$ 59.00

Chart I

UNITED BROTHERHOOD OF CARPENTERS NO. 1808
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
IL - Delegates for Mondale - 21ST C.D.	C00176933	$ 50.00

Chart I

8504051335

CARPENTERS LOCAL UNION NO. 295
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
IL - Delegates for Mondale - 21ST C.D.	C00176933	$ 50.00
	Chart I	

CARPENTERS DISTRICT COUNCIL PAC
C00129940

RECIPIENT	IDENTIFICATION	AMOUNT
PA - Mondale Delegates - 20TH District	C00180737	$ 50.00
	Chart I	

LOCAL 25 POLITICAL AND EDUCATION COMMITTEE
C00137794

RECIPIENT	IDENTIFICATION	AMOUNT
IL - Second C.D. Delegates for Mondale	C00178251	$ 50.00
	Chart I	

UFCW LOCAL 722 PAC
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
PA - 11TH Congressional Delegates for Mondale	C00178467	$ 50.00
	Chart I	

8504050136

PLUMBERS LOCAL UNION 27 POLITICAL ACITON COMMITTEE
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
PA - Mondale Delegates - 20TH District	C00180737	$ 50.00

Chart I

PIPEFITTERS LOCAL 524 PAC
C00131706

RECIPIENT	IDENTIFICATION	AMOUNT
PA - 11TH Congressional Delegates for Mondale	C00178467	$ 40.00

Chart I

WOMEN OF POLITICAL ACTION
(NOT QUALIFIED)
C00179556

RECIPIENT	IDENTIFICATION	AMOUNT
PA - 4TH District Delegates for Mondale	C00179846	$ 30.00

Chart I

WILL-GRUNDY COUNTIES CENTRAL TRADES AND LABOR COUNCIL (NOT QUALIFIED)
C00021907

RECIPIENT	IDENTIFICATION	AMOUNT
IL - Fourth District Mondale Delegate Committee	C00175596	$ 200.00
IL - Fourth District Mondale Delegate Committee	C00175596	[$200.00]

Chart I
TOTAL $ 0

8504051737

FRIENDS OF PETER SHAPIRO
(NOT QUALIFIED)
C00167114

RECIPIENT	IDENTIFICATION	AMOUNT
NH - NH 2ND District Delegates for Mondale	C00176891	$ 1,000.00
	Chart I	

CAMPAIGN FUND FOR PINELLAS FOR PROGRESS
(NOT QUALIFIED)
C00177105

RECIPIENT	IDENTIFICATION	AMOUNT
FL - Mondale Delegates C.D. 8	C00178145	$ 300.00
	Chart I	

HOYER FOR CONGRESS
C00140715

RECIPIENT	IDENTIFICATION	AMOUNT
MD - Prince George's Delegates for Mondale	C00181602	$ 2,500.00
MD - Prince George's Delegates for Mondale	C00181602	$ 2,500.00
	Chart I TOTAL	$ 5,000.00

CITIZENS FOR SINGER
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
IL - Ninth District Mondale Delegate Committee	C00176180	$ 400.00
IL - Ninth District Mondale Delegate Committee	C00176180	$ 1,000.00
	Chart I TOTAL	$ 1,400.00

8504051338

RUSSO FOR CONGRESS COMMITTEE
C00049635

RECIPIENT	IDENTIFICATION	AMOUNT
IL - Second C.D. Delegates for Mondale	C00178251	$ 300.00
IL - Third C.D. Delegates for Mondale	C00178715	$ 300.00
IL - Third C.D. Delegates for Mondale	C00178715	$ 700.00
	Chart I TOTAL	$ 1,300.00

CITIZENS FOR SARBANES
C00029777

RECIPIENT	IDENTIFICATION	AMOUNT
MD - Third District Delegates for Mondale	C00179853	$ 1,000.00
	Chart I	

MIKULSKI FOR CONGRESS
C00036095

RECIPIENT	IDENTIFICATION	AMOUNT
MD - Third District Delegates for Mondale	C00179853	$ 1,000.00
	Chart I	

FAZIO FOR CONGRESS COMMITTEE
C00088773

RECIPIENT	IDENTIFICATION	AMOUNT
NH - NH 1ST District Delegates for Mondale	C00176909	$ 1,000.00
	Chart I	

8504050139

COMMITTEE TO RE-ELECT SENATOR LEICHTER
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
NY - Mondale 17TH C.D. Delegate Committee	C00176883	$ 1,000.00

Chart I

FRIENDS OF DICK GOTTFRIED
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
NY - Mondale 17TH C.D. Delegate Committee	C00176883	$ 326.68
NY - Mondale 17TH C.D. Delegate Committee (In-Kind)	C00176883	$ 673.32
	Chart I TOTAL	$ 1,000.00

MURTHA FOR RE-ELECTION COMMITTEE
C00019075

RECIPIENT	IDENTIFICATION	AMOUNT
PA - Mondale Delegate Committee - 12TH C.D.	C00178954	$ 1,000.00*

Chart I

1984 ENDORSED DEMOCRATIC CANDIDATE COMMITTEE
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
NY - Erie County Delegates for Mondale	C00181305	$ 850.00

Chart I

*Guaranteed Outstanding Contribution (Pledge)

8504050514 0

I'M FOR JOE COMMITTEE
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
NY - Erie County Delegates	C00181305	$ 750.00

Chart I

CITIZENS FOR RONAN
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
IL - Eleventh District Mondale Delegate Committee	C00175828	$ 500.00

Chart I

CITIZENS FOR VRDOLYAK
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
IL - Second C.D. Delegates for Mondale	C00178251	$ 500.00

Chart I

FRIENDS OF RUTH MESSINGER
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
NY - Mondale 17TH C.D. Delegate Committee	C00176883	$ 500.00

Chart I

3524050514 1

FRIENDS OF OLIVER KOPPELL
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
NY - Mondale 17TH C.D. Delegate Committee	C00176883	$ 250.00

Chart I

CITIZENS FOR LAWRENCE GULOTTA
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
IL - Second C.D. Delegates for Mondale	C00178251	$ 50.00

Chart I

FRIENDS OF JIM KEANE
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
NY - Erie County Delegates for Mondale	C00181305	$ 50.00

Chart I

MUSTO SENATE COMMITTEE
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
PA - 11TH Congressional Delegates for Mondale	C00178467	$ 20.00

Chart I

CITIZENS FOR DAVID E. JACKSON
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
IL - Second C.D. Delegates for Mondale	C00178251	$ 20.00
	Chart I	

WILLIAM MOROVITZ CAMPAIGN FUND
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
IL- Ninth District Mondale Delegate Committee	C00176180	$ 500.00
IL- Ninth District Mondale Delegate Committee	C00176180	$ 500.00
IL- Ninth District Mondale Delegate Committee	C00176180	[$1,000.00]
	Chart I TOTAL	$ 0

CITIZENS FOR JOHN CULLERTON
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
IL- Ninth District Mondale Delegate Committee	C00176180	$ 500.00
IL- Ninth District Mondale Delegate Committee	C00176180	[$ 500.00]
	Chart I TOTAL	$ 0

8504050514 3

ANSONIA INDEPENDENT DEMOCRATS
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
NY - Mondale 17TH C.D. Delegate Committee	C00176883	$ 1,500.00

Chart I

38TH WARD REGULAR DEMOCRATIC ORGANIZATION
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
IL - Eleventh District Mondale Delegate Committee	C00175828	$ 500.00

Chart I

PERRY COUNTY DEMOCRATIC PARTY
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
IL - 22ND C.D. Delegates for Mondale	C00177840	$ 200.00

Chart I

CHEEKTOWAGA DEMOCRATIC TOWN COMMITTEE
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
NY - Erie County Delegates for Mondale	C00181305	$ 100.00

Chart I

8504050514 4

ASHCRAFT AND GEREL
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
DC - Mondale Delegates - DC	C00182550	$ 300.00
DC - Mondale Delegates - DC	C00182550	$ 250.00
	Chart I TOTAL	$ 550.00

KOONZ, MCKENNEY AND JOHNSON
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
DC - Mondale Delegates - DC	C00182550	$ 300.00
	Chart I	

MILLER AND LEHER
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
CO - Mondale Colorado Delegate Selection Committee	C00181412	$ 500.00
	Chart I	

1901 LTD (A PARTNERSHIP)
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
CO - Mondale Colorado Delegate Selection Committee	C00181412	$ 500.00
	Chart I	

8504050514S

E.M.F. AND ASSOCIATES
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
FL - South Florida Delegates for Mondale	C00176875	$ 100.00

Chart I

EXCEL CLEANERS
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
IL - Delegates for Mondale Committee - 21ST C.D.	C00176933	$ 100.00

Chart I

VANDALIA BUS LINES
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
IL - Delegates for Mondale Committee - 21ST C.D.	C00176933	$ 25.00

Chart I

GENE'S HARVEY AUTO REPAIR
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
IL - Second C.D. Delegates for Mondale	C00178251	$ 200.00

Chart I

8504050514 6

DON'S AUTO BODY
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
IL - Second C.D. Delegates for Mondale	C00178251	$ 50.00
	Chart I	

REGAL DRUG COMPANY INC.
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
IL - Second C.D. Delegates for Mondale	C00178251	$ 20.00
	Chart I	

NIEMEYER INC. DBA O'BRIEN'S PUB
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
IL - Second C.D. Delegates for Mondale	C00178251	$ 20.00
	Chart I	

MULTIMEDIA CABLEVISION INC.
DBA CABLEVISION OF HARVEY
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
IL - Second C.D. Delegates for Mondale	C00178251	$ 20.00
	Chart I	

BABE'S CLUB
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
IL - Second C.D. Delegates for Mondale	C00178251	$ 20.00
	Chart I	

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TASH INC.
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
IL - Second C.D. Delegates for Mondale	C00178251	$ 50.00

Chart I

GM CONSTRUCTION
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
IL - Second C.D. Delegates for Mondale	C00178251	$ 50.00

Chart I

MOSKOWITZ AND MOLL
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
NY - Mondale 17TH C.D. Delegate Committee	C00176883	$ 250.00

Chart I

SEBALD DAIRY FARMS
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
PA - 21ST Congressional 1984 Delegates for Mondale	C00179457	$ 50.00

Chart I

NAME OF POLITICAL COMMITTEE NOT DISCLOSED

RECIPIENT	IDENTIFICATION	AMOUNT
PA - 22ND C.D. Delegate Committee for Mondale	C00180166	$ 5,000.00A/

Chart I

NAME OF POLITICAL COMMITTEE NOT DISCLOSED

RECIPIENT	IDENTIFICATION	AMOUNT
PA - 22ND C.D. Delegate Committee for Mondale	C00180166	$ 2,000.00B/

Chart I

NAME OF POLITICAL COMMITTEE NOT DISCLOSED

RECIPIENT	IDENTIFICATION	AMOUNT
FL - Delegates for Mondale	C00178509	$ 2,000.00C/

Chart I

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A/ This contribution is noted on the Detailed Summary Page as being from a Political Committee; however, the itemization on Schedule A fails to disclose the name of the contributing committee.

B/ Ibid.

C/ This amount is disclosed on the Detailed Summary Page as being from a Political Committees; however, a supporting Schedule A has not been provided.

Mondale for President
2301 Wisconsin Avenue, N.W.
Washington, D.C. 20007
Telephone: 202-625-1984

MONDALE

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
	)	
Mondale for President Committee, Inc.	)	MUR 1667
Michael S. Berman, as Treasurer	)	

MOTION TO MODIFY SUBPOENA AND ORDER
TO ANSWER INTERROGATORIES

On May 29, 1984, the Mondale for President Committee, Inc. ("MPC") received a subpoena from the Commission for production of documents and order to submit written answers to interrogatories. The subpoena and order require compliance within 15 days, by June 13, 1984. A request for an extension of time in which to comply is attached.

MPC repeatedly has expressed its intention to cooperate with the FEC in this investigation. This intention is illustrated by our April 30, 1984, request for conciliation and a June 14, 1984 meeting with the General Counsel's office. To this end, MPC is filing this limited motion to modify the subpoena and order based on concerns over specific requests in this subpoena, rather than challenging generally their breadth and vagueness. Of the 18 document requests, MPC will do its best to supply the material. It is objecting only to one request and is seeking to limit two others. Of the 18 interrogatories (each of which have multiple

Paid for by Mondale for President, Inc.

subparts), MPC is moving to strike 3 sub-parts of the first 9 questions. Of the remaining 9 questions, MPC is objecting to 6 and seeking to limit one. In order to provide the FEC with the information which it seeks while protecting the rights of MPC and its supporters, MPC requests that the Commission modify this subpoena.

The Commission, in order to obtain judicial enforcement of its subpoena, must demonstrate that (1) the investigation will be conducted pursuant to a legitimate purpose; (2) its inquiry is relevant to that purpose; (3) the information sought is not already within the possession of the agency; and (4) the appropriate administrative steps have been followed. Donaldson v. United States, 400 U.S. 517, 526-27 (1971); United States v. Powell, 379 U.S. 48, 57-58 (1964). The "delicate nature of the materials" sought in similar FEC investigations has prompted judicial articulation of a standard of "extra-careful scrutiny" in the enforcement of FEC subpoenas. FEC v. MNPL, 2 Fed. Elec. Camp. Fin. Guide Paragraph 9151 at 51,139 (1981). MPC respectfully urges that the Commission review this subpoena with these concerns in mind and modify the subpoena accordingly as outlined below.

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INTERROGATORIES

MPC moves to modify or strike the following interrogatories:

(1)(b). MPC moves to strike the request for information concerning "strategic assistance." This term is vague and overbroad. Moreover, it could be construed as covering the content of MPC's political communications and expression. Such an inquiry would constitute a

direct interference with the associational rights of MPC and its delegates which are protected under the First Amendment. See FEC v. MNPL, supra at 51,140.

(5)(b). MPC moves to strike the request for information concerning "strategic assistance" for the reasons set forth in (1)(b) above.

(5)(d). MPC moves to strike the request for information concerning "assistance in the preparation of campaign materials." Coordination in the preparation of campaign materials is permitted under 11 C.F.R. Section 110.14(d)(2)(i). There is no statutory or regulatory basis for requesting information concerning this activity, since it is permissible under the regulations and is not an indicia of affiliation.

10. MPC moves to modify this question to cover only "officers or members" of a delegate committee. 11 C.F.R. Sections 100.5(g)(2)(ii)(C) and 110.3(a)(1)(iii)(C) provide no basis for inquiry into volunteers or staff members who lack any management responsibility or authority. The reasons why volunteers to and staff of delegate committees chose to support the activities of particular committees is at the heart of the activity protected by the First Amendment. Any discovery request relating to "volunteers... implicates the rigorously protected first amendment interest in privacy of political association." FEC v. MNPL, supra at 51,141.

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Inquiry into the activities of individuals who have voluntarily chosen to associate with delegate committees for political purposes is of little or no relevance to this proceeding. Moreover, making individuals who engaged in volunteer activities a focus of this enforcement action will have the undesirable effect of discouraging participation in campaigns by individual citizens for fear of possible government reprisals. Any inquiry into these matters should be undertakeen only where the scope of the information sought has been carefully tailored to minimize the intrusion by the FEC into citizen participation in grass-roots activities. The information requested in this question could not possibly lead to information which is legitimate for FEC inquiry or is relevant to affiliation.

11. MPC moves to strike this question, because the term "services" is vague. Question 10 seeks information on staff and Question 13 seeks information on vendors. In this context, we do not understand the meaning of "performing services."

12. MPC moves to strike this question, because the term "performed services" is vague and because it seeks information which is not in the possession of MPC. Moreover, information concerning persons who received payment from MPC and from a delegate committee is already in the possession of the Commission.

13. MPC moves to strike this question. Under the

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regulations, common vendors are relevant only as to questions concerning independent expenditures. 11 C.F.R. 109.2(b)(4)(i)(B). There is no statutory or regulatory basis for considering common vendors as indicative of affiliation.

16,17,18. MPC moves to strike these questions for the reasons set forth in (5)(d) above.

Request for Document Production

MPC moves to modify or strike the following requests for production of documents:

11,12. MPC moves to modify this request to pertain only to 'officers or members' of a delegate committee for the reasons set forth as to Interrogatory no. 10.

16. MPC moves to strike this request for the reasons set forth as to Interrogatory nos. 16, 17 and 18.

17,18. These items request in machine-readable form information which is already in possession of the Commission. Although the Commission could not require the Committee to go to the effort and expense of producing this material,*/ the Committee is willing to provide it in machine readable form. However, it is our understanding that the Commission would not be able to derive from our computer tapes the information in the form in which the Commission seeks to produce it.

*/ Generally, an agency must make a showing that information subpoenaed is not already in its possession in order to obtain judicial enforcement of its subpoena. See Donaldson v. United States, 400 U.S. 517, 526-27 (1971); United States v. Powell, 379 U.S. 48, 57-58 (1964).

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Since it would cost the Committee a considerable sum to produce the computer tapes requested, the Committee prefers to avoid the expense and time required in so doing unless the material will be usable to the Commission. An explanation of our computer records and a description of what is available may help to explain the limitations of the computer tapes we can provide.

In the MPC accounting systems, as in most automated accounting systems used by most businesses, any "individual" who "received payment" is by definition a "vendor". Therefore, in response to the requests made in items #17 and #18, we can't distinguish between "individuals who received payment(s)" and "vendors" when discussing the data available from our systems. To MPC computers, they are all the same. FEC reporting requirements are impossible to implement with a commercially available software system. Thus, our processing is a patchwork of improvisations to perform normal accounting functions plus meet FEC reporting requirements at a manageable cost. It is a very complex system since most commercial software is accrual basis accounting, while the FEC requires cash basis reporting in an order of detail unknown in a business environment.

There are also some differences in what is available from the MPC in-house computer, without additional cost, and records available from an outside computer service vendor who supplements our in-house

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capacity. CDSI, an outside vendor, generates our B-P schedule for two of our checking accounts from hard copy in-put forwarded from Mondale for President. These tapes are available but not in a form allowing identification of vendors and payments, as requested. ADP prepares the MPC payroll, but the B-P schedule is typed manually, from a hard copy payroll register supplied by ADP to MPC. Payroll is entered into our General Ledger system as a journal entry in which only the expense account and cash account is reflected. We have no "machine readable materials" of our payroll.

The following outline describes our system by reference to: the type of transaction, the system by which it is processed, and the form in which the data is available.

I. Regular checking account transactions (covers most expenditure from national headquarters)

A. In house system - records available

1. General ledger files - accrual basis transactions by account number, by date, with voucher number and vendor number. None of these transaction records are by vendor name. The vendor number is the only data identifying the vendor.

2. Vendor files - Vendor number, name and address, open items with voucher number, total expense year to date (accrual basis), no detail on cash transactions. Because of early problems with our system, this file

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is "corrupt."

3. Limitations - These files are part of a commercial software package and do not maintain detail on transactions. In addition, this account is for regular checking only, and does not include the Draft account transactions from Field operations.

B. CDSI Records available

1. Transaction file of all checks; 80 character field with transaction code, date, vendor number, account number and amount.
2. Vendor file - vendor number, name and address
3. H-file - account
   Subject File - subaccount
   Client file - cost center
   These separate files identify and describe an element in each account code: account, sub-account, cost center.
4. In order to merge these files, the FEC would have to create a program of its own. The CDSI program is its business property and is not available to us. Even if a program were created to merge these files, these records only cover the vendor information already reported in alphabetical order on our B-P schedule.
5. These files contain disparate data on transactions dating from October 1983 to date. Prior to October 1983 we have no "machine readable" data.
6. Record layouts and descriptions of elements within records can be prepared, if the Commission wants

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these records.

II. Draft Account Transactions (covers most expenditures from field)

A. In-House system - Draft transactions are entered as Journal Entries with a debit expense and a credit to cash. No vendor detail or vendor description is maintained since this is a conventional software package.

B. CDSI Records Available - in the same files described above in I., item B.

1. Transaction file on all drafts: 80 character field with transaction code, date, vendor number, account number and ammount.

2. Vendor file: each draft number is recorded as a unique vendor number. The name and address of the payee is recorded as unique description.

3. H-file - account
Sub-object - sub-account
Client file - cost center
These files each identify and describe an element in the account code: account, subaccount, cost center.

4. In order to merge these files, the FEC would have to create a program of its own. If the FEC were to use the vendor file only, it could create a program to read the vendor names and addresses and attempt to merge all near entries. Conceivably, this could be used to produce an alphabetical list of vendors (that is, all individuals who receive payments). Doing so,

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however, would pose problems similar to those encountered in attempting to aggregate contributor names. Even if this problem were overcome, it would not provide any dates or amounts of transactions unless the files were merged.

5. Prior to October 1983 we have no "machine readable" data.

6. Record layouts and descriptions of elements within records can be prepared if the Commission wants these records.

III. Payroll Account Transactions

A. In-House system payroll is entered as a standard accounting journal entry from our Payroll Register. No detail as to payee, etc.

B. BP is typed from Payroll Register.

C. We have no "machine readable" data. Our only complete record is the B-P report we type and have on the public record.

IV. Direct Mail Fundraising Transactions

A. In-House System - Manual checks, all transactions entered by Journal entry, no vendor detail.

B. B-P typed from manual check register.

C. No "machine readable" data.

V. Wire Transfers: Media purchases and Charter flights

A. In house system - all transactions entered as Journal entries from bank documentation. No vendor detail.

B. B-P typed from bank documentation.

C. No "machine readable" data.

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In summary, the "machine readable" records described above can be provided. Upon request from MPC, CDSI will prepare record layouts and descriptions for the materials they render. MBSI, the software manufacturer for our in-house system, did not provide record layouts as part of their documentation. Although the Committee will provide these records, we request that the Commission first determine whether they will in fact be usable by the Commission for the purposes requested.

CONCLUSION

For the reasons set forth above, MPC respectfully moves to modify the FEC subpoena and order.

Respectfully submitted,

David Irshin
General Counsel

Carolyn U. Oliphant
Deputy General Counsel

Dated: June 5, 1984.

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Mondale for President
2001 Wisconsin Avenue, N.W.
Washington, D.C. 20007
Telephone: 333-333-1000

GC-3483

MONDALE

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Mondale for President Committee, Inc.	)	MUR 1667
Michael S. Berman, as Treasurer	)	
	)	

JUL 5 P6:06

REQUEST FOR EXTENSION OF TIME TO RESPOND TO SUBPOENA AND ORDER TO ANSWER INTERROGATORIES

On May 29, 1984, the Commission served the Mondale for President Committee, Inc. ("MPC") with a subpoena to produce requested documents and an order to submit answers to interrogatories within a 15-day deadline. MPC currently is making a strenuous, good faith attempt to respond promptly to the Commission's requests. A full response to these requests has essentially required an extensive inquiry which cannot be completed within the extremely brief 15-day period. MPC therefore requests an additional thirty days beyond the current due date of June 13 to respond to the interrogatories and complete the production of documents.

MPC anticipates that it can furnish the Commission with most of the documents by June 13 and can forward any additional documents as they are discovered over the next thirty days. Any submission of answers to interrogatories by the current due date, however, would incur a substantial risk of being incomplete.

The subpoena and interrogatories are far reaching and seek detailed information about various types of contacts between MPC and delegates, contributors and their activities in numerous states. MPC expeditiously has begun the extensive search of files and questioning of MPC staff. The fact that our staff presently is dispersed across the country, immersed in preparation for the heavily contested and crucial final primaries and the nominating convention has made this task extremely difficult and time-consuming.

Rather than seek to quash the subpoena and interrogatories which in many areas are overbroad and vague, MPC has made every effort to respond to the Commission's requests. MPC consistently

Paid for by Mondale for President, Inc.

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has cooperated fully with the Commission to bring this matter to a speedy and reasonable resolution. Neither the Commission, MPC, nor the public interest will be served by the provision of incomplete answers to meet an unreasonably short deadline, allowing MPC a full opportunity to respond to a prompt resolution of the case by the Commission. MPC therefore respectfully requests an additional thirty days to provide answers to interrogatories and complete document production.

Respectfully submitted,

David M. Ifshin
General Counsel

Carolyn U. Oliphant
Deputy General Counsel

Dated: June 5, 1984.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 5, 1984

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

ATTENTION: STEPHEN MIMS

FROM: JOHN D. GIBSON
ASSISTANT STAFF DIRECTOR
REPORTS ANALYSIS DIVISION

SUBJECT: DELEGATE COMMITTEE INFORMATION - BACK-UP

Attached is back-up information for Charts I and III which were supplied to you on May 25 and May 29. Should you have any questions, please let me know.

Attachment

5 1 6 3 5 0 4 0 5 5 3

AFSCME - PEOPLE
C00011114

RECIPIENT	IDENTIFICATION	AMOUNT
DC - Mondale Delegates - DC	C00182550	$ 1,000.00
FL - C.D. 2 Delegates for Mondale, FL	C00177873	$ 1,000.00
FL - C.D. 5 Delegates for Mondale	C00178707	$ 1,000.00
FL - C.D. 7 Delegates for Mondale	C00178947	$ 1,000.00
FL - Delegates for Mondale	C00178509	$ 2,000.00
FL - Mondale 16TH District Delegate Committee	C00175950	$ 2,000.00
FL - Mondale Delegates, C.D. 13	C00179440	$ 1,000.00
FL - South Florida Delegates for Mondale	C00176875	$ 5,000.00
IL - 15TH District Delegates for Mondale	C00177238	$ 1,000.00*
IL - Eleventh District Mondale Delegate Committee	C00175828	$ 1,000.00
IL - Ninth District Mondale Delegate Committee	C00176180	$ 2,000.00
IL - Third Congressional District Delegates for Mondale	C00178715	$ 2,000.00
NH - NH 1ST District Delegates for Mondale	C00176909	$ 5,000.00
NY - 6TH C.D. Delegates for Mondale	C00179887	$ 1,910.00
NY - At-Large Delegates for Mondale	C00181016	$ 5,000.00
NY - Mondale 17TH C.D. Delegate Committee	C00176883	$ 860.00
PA - 21ST Congressional 1984 Delegates for Mondale	C00179457	$ 1,500.00
PA - Delegates At-Large for Mondale	C00180679	$ 5,000.00
PA - Second Congressional District Delegates for Mondale	C00178319	$ 1,000.00
RI - 1ST and 2ND District Delegate Committee(s) for Mondale	C00177246	$ 2,500.00
RI - 1ST and 2ND District Delegate Committee(s) for Mondale	C00177808	$ 2,500.00
WI - Wisconsin At-Large Delegate Mondale Committee	C00180687	$ 5,000.00
	Chart I Sub-Total	$50,270.00

*Different Amounts Reported by PAC and Delegate Committee (Delegate Committee Amount Reflected)

RECIPIENT	IDENTIFICATION	AMOUNT
NY - 11TH C.D. Delegates for Mondale	C00181115	$ 510.00
NY - 9TH C.D. Delegates for Mondale	C00179895	$ 375.00
NY - 8TH C.D. Delegates for Mondale	C00180224	$ 110.00
NY - 7TH C.D. Delegates for Mondale	C00179861	$ 45.00
NY - Long Island Mondale 4TH C.D.	C00181396	$ 2,055.00
NY - North Country Delegates for Mondale (26TH C.D.)	C00181107	$ 1,210.00
NY - The Mondale Team (32ND C.D.)	Not Registered	$ 1,215.00
NY - Southern Tier Committee for Mondale (34TH C.D.)	C00182329	$ 500.00
NY - 19TH C.D. Delegate Committee for Mondale	C00182899	$ 925.00
NY - 18TH C.D. Delegate Committee for Mondale	Not Registered	$ 350.00
NY - 15TH C.D. Delegates Coalition for Mondale	Not Registered	$ 960.00
NY - 16TH C.D. Delegates for Mondale	C00181388	$ 335.00
NY - 14TH C.D. Delegates for Mondale	C00181149	$ 355.00
NY - 13TH C.D. Delegates for Mondale	C00181131	$ 15.00
NY - 12TH C.D. Delegates for Mondale	C00181123	$ 510.00
NY - Mondale 19TH C.D. Delegate Committee	C00182899	$ 300.00
NY - Mondale 18TH C.D. Delegate Committee	Not Registered	$ 50.00
NY - Mondale 17TH C.D. Delegate Committee	C00176883	$ 750.00
NY - 15TH C.D. Delegate Coalition for Mondale	Not Registered	$ 750.00
NY - 14TH C.D. Delegates for Mondale	C00181149	$ 250.00
NY - 11TH C.D. Delegates for Mondale	C00181115	$ 250.00
NY - 9TH C.D. Delegates for Mondale	C00179895	$ 250.00
NY - 8TH C.D. Delegates for Mondale	C00180224	$ 500.00
NY - 23RD C.D. Delegates Committee for Mondale	C00180588	$ 845.00
NY - Naples-Mondale for President (23RD C.D.)	C00180216	$ 715.00
NY - Delegates for Mondale 25TH C.D.	C00180414	$ 775.00
NY - Lower Hudson Delegates for Mondale (22ND C.D.)	C00180570	$ 565.00
NY - 16TH C.D. Delegates for Mondale	C00181388	$ 500.00
NY - 12TH C.D. Delegates for Mondale	C00181123	$ 250.00
NH - 2ND C.D. Delegates for Mondale	C00176891	$ 1,350.00
	Chart III Sub-Total	$17,570.00
	TOTAL	$67,840.00

UAW V-CAP
C00002840

RECIPIENT	IDENTIFICATION	AMOUNT
IL - 12TH District Mondale Delegate Committee	C00175943	$ 2,000.00
IL - 12TH District Mondale Delegate Committee	C00175943	[$675.50]
IL - 16TH Delegates for Mondale	C00178681	$ 2,000.00
IL - 17TH District Mondale Delegate Committee	C00176925	$ 2,000.00
IL - 17TH District Mondale Delegate Committee	C00176925	[$1,042.24]
IL - 19TH District Delegates for Mondale Committee	C00178673	$ 2,000.00
IL - 20TH C.D. Delegates for Mondale	C00177881	$ 2,000.00
IL - Mondale Delegates for the Illinois 18TH Committee	C00176198	$ 2,000.00
NH - NH 2ND District Delegates for Mondale	C00176891	$ 5,000.00
NY - At-Large Delegates for Mondale	C00181016	$ 5,000.00
PA - Mondale Delegates Committee	C00178137	$ 3,400.00*
PA - 4TH District Delegates for Mondale	C00179846	$ 3,500.00
PA - Delegates At-Large for Mondale	C00180679	$ 5,000.00
WI - 5TH C.D. Mondale Delegate Committee	C00181438	$ 2,500.00
	Chart I Sub-Total	$34,682.26
MI - Sixth District Delegates for Mondale	C00179697	$ 3,000.00
MO - Western Missouri Mondale Delegate Committee (Kansas City)	C00183186	$ 2,500.00
MO - Western Missouri Mondale Delegate Committee (St. Louis)	Not Registered	$ 2,500.00
NY - 16TH C.D. Delegates for Mondale Committee	C00181388	$ 5,000.00
NY - Erie County Delegates for Mondale	C00181305	$ 500.00
PA - 15TH C.D. Delegates for Mondale	Not Registered	$ 500.00
PA - 5TH C.D. Delegates for Mondale	C00181008	$ 500.00
PA - 14TH C.D. Delegates for Mondale	C00180562	$ 5,000.00
WI - Wisconsin At-Large Mondale Delegates Committee	C00180687	$ 2,500.00
	Chart III Sub-Total	$22,000.00
	TOTAL	$56,682.26

*Different Amounts Reported By PAC and Delegate Committee (Delegate Committee Amount Reflected)

AFT - COPE
C00028860

RECIPIENT	IDENTIFICATION	AMOUNT
DC - Mondale Delegates - DC	C00182550	$ 500.00
FL - 14TH C.D. For Mondale	C00175810	$ 500.00
FL - C.D. 9 Delegates for Mondale	C00178475	$ 2,000.00
FL - Mondale 15TH District Delegate Committee	C00176644	$ 1,500.00
FL - Northern 12TH C.D. Delegates for Mondale	C00178327	$ 500.00
FL - South Florida Delegates for Mondale	C00176875	$ 2,000.00
IL - 1ST C.D. Delegates for Walter Mondale	C00178236	$ 1,000.00
IL - 7TH C.D. Delegates for Mondale	C00178244	$ 1,500.00
IL - Fourth District Mondale Delegate Committee	C00175596	$ 1,000.00
IL - Second C.D. Delegates for Mondale	C00178251	$ 1,000.00
IL - Sixth District Mondale Delegate Committee	C00177139	$ 1,000.00
IL - Third C.D. Delegates for Mondale	C00178715	$ 1,000.00
MT - Montana At-Large Delegates for Mondale Committee	C00181313	$ 1,000.00
MT - Montana At-Large Delegates for Mondale Committee	C00181313	[$698.40]
NH - NH 1ST District Delegates for Mondale	C00176909	$ 5,000.00
NY - 10TH C.D. Delegates for Mondale	C00181032	$ 500.00
NY - At-Large Delegates for Mondale	C00181016	$ 5,000.00
NY - Mondale 17TH C.D. Delegate Committee	C00176883	$ 750.00
PA - Delegates At-Large for Mondale	C00180679	$ 5,000.00
PA - 14TH C.D. Delegates for Mondale	C00180562	$ 2,000.00
PA - 14TH C.D. Delegates for Mondale	C00180562	$ 50.00
PA - 14TH C.D. Delegates for Mondale	C00180562	$ 50.00
PA - Second C.D. Delegates for Mondale	C00178319	$ 500.00
Chart I Sub-Total		$32,651.60
FL - Delegates for Mondale 3RD C.D.	C00178509	$ 2,000.00
FL - C.D. 6 Delegates for Mondale	Not Registered	$ 500.00
FL - C.D. 11 Delegates for Mondale	Not Registered	$ 500.00
NY - Long Island Mondale 1ST C.D. Delegates	C00181925	$ 2,000.00
NY - Naples-Mondale for President Slate - 24TH C.D.	C00180216	$ 1,300.00

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RECIPIENT	IDENTIFICATION	AMOUNT
NY - 7TH C.D. Delegates for Mondale	C00179861	$ 500.00
NY - 9TH C.D. Delegates for Mondale	C00179895	$ 250.00
NY - Delegates for Mondale - 12TH C.D.	C00181123	$ 250.00
NY - Delegates for Mondale - 11TH C.D.	C00181115	$ 250.00
NY - Delegates for Mondale - 14TH C.D.	C00181149	$ 250.00
NY - 15TH C.D. Delegates Coalition for Mondale	Not Registered	$ 750.00
NY - Mondale 19TH C.D. Delegates Committee	C00182899	$ 300.00
NY - 28TH C.D. Delegates for Mondale	C00181297	$ 2,000.00
NY - West New York Elect Mondale Committee - 31ST C.D.	Not Registered	$ 3,000.00
NY - Mondale Team - 32ND C.D.	Not Registered	$ 3,000.00
NY - Southern Tier Committee for Mondale (34TH C.D.)	C00182329	$ 1,500.00
PA - Third C.D. Delegates for Mondale Committee	C00180547	$ 1,500.00
PA - Tenth C.D. Delegates for Mondale Committee	C00180141	$ 1,000.00
	Chart III Sub-Total	$20,850.00
	TOTAL	$53,501.60

CWA - COPE
C00002089

RECIPIENT	IDENTIFICATION	AMOUNT
FL - C.D. 5 Delegates for Mondale	C00178707	$ 1,000.00
FL - Delegates for Mondale	C00178509	$ 1,000.00
FL - South Florida Delegates for Mondale	C00176875	$ 1,000.00
IL - Second C.D. Delegates for Mondale	C00178251	$ 1,000.00
NH - NH 2ND District Delegates for Mondale	C00176891	$ 5,000.00
NY - At-Large Delegates for Mondale	C00181016	$ 5,000.00
NY - Long Island Mondale Committee	C00182360	$ 2,500.00
PA - Delegates At-Large for Mondale	C00180679	$ 5,000.00
WI - 5TH C.D. Mondale Delegate Committee	C00181438	$ 5,000.00
WI - Wisconsin At-Large Delegate Mondale Committee	C00180687	$ 5,000.00
	Chart I Sub-Total	$31,500.00
NY - The Mondale Team - 32ND C.D.	Not Registered	$ 500.00
	Chart III Sub-Total	$ 500.00
	TOTAL	$32,000.00

UNITED MINE WORKERS OF AMERICA PAC
C00013342

	RECIPIENT	IDENTIFICATION	AMOUNT
IL -	22ND C.D. Delegates for Mondale	C00177840	$ 200.00
IL -	22ND C.D. Delegates for Mondale	C00177840	$ 4,800.00
NH -	NH 2ND District Delegates for Mondale	C00176891	$ 5,000.00
PA -	Mondale Delegate Committee 12TH C.D.	C00178954	$ 5,000.00
VA -	Mondale 3RD District Delegate Selection Committee	C00182774	$ 5,000.00
		Chart I Sub-Total	$20,000.00
PA -	22ND C.D. Delegates for Mondale	C00180166	$ 5,000.00
KY -	Kentucky At-Large Mondale Delegates Committee	C00181024	$ 5,000.00
		Chart III Sub-Total	$10,000.00
		TOTAL	$30,000.00

SEIU-COPE
C00004036

	RECIPIENT	IDENTIFICATION	AMOUNT
IL -	Eleventh District Mondale Delegate Committee	C00175828	$ 1,000.00
IL -	Eleventh District Mondale Delegate Committee	C00175828	[$294.42]
MD -	Mondale Delegate At-Large Committee for Maryland	C00181974	$ 5,000.00
NY -	At-Large Delegates for Mondale	C00181016	$ 5,000.00
PA -	Delegates At-Large for Mondale	C00180679	$ 4,000.00
PA -	Mondale Delegate Committee - 12TH C.D.	C00178954	$ 1,000.00
PA -	Pennsylvania 17TH C.D. Delegates for Mondale	C00180182	$ 1,000.00
		Chart I Sub-Total	$16,705.58
MA -	6TH District Delegate for Mondale	Not Registered	$ 500.00
OH -	Ohio Mondale At-Large Delegates State Committee	Not Registered	$ 2,500.00
		Chart III Sub-Total	$ 3,000.00
		TOTAL	$19,705.58

AFL-CIO COPE
C00003806

	RECIPIENT	IDENTIFICATION	AMOUNT
DC -	Mondale Delegates - DC	C00182550	$ 600.00
FL -	Mondale 15TH District Delegate Committee	C00176644	$ 3,000.00
FL -	Mondale Delegates C.D. 8	C00178145	$ 1,000.00
FL -	South Florida Delegates for Mondale	C00176875	$ 1,000.00
IL -	19TH District Delegates for Mondale Committee	C00178673	$ 3,200.00
IL -	22ND C.D. Delegates for Mondale	C00177840	$ 3,200.00
IL -	17TH District Mondale Delegate Committee	C00176925	$ 3,200.00
IL -	17TH District Mondale Delegate Committee	C00176925	[$1,563.36]
		Chart I Sub-Total	$13,636.64
PR -	Delegates Committee With Mondale	Not Registered	$ 5,000.00
		Chart III Sub-Total	$ 5,000.00
		TOTAL	$18,636.64

ILGWU CAMPAIGN COMMITTEE
C00004861

	RECIPIENT	IDENTIFICATION	AMOUNT
NH -	NH 2ND District Delegates for Mondale	C00176891	$ 5,000.00
NY -	L.I. - Mondale 2ND C.D.	C00181727	$ 2,000.00
PA -	4TH District Delegates for Mondale	C00179842	$ 5,000.00
		Chart I TOTAL	$12,000.00

ACTWU-COPE
C00005728

RECIPIENT	IDENTIFICATION	AMOUNT
IL - 7TH C.D. Delegates for Mondale	C00178244	$ 1,000.00
NH - NH 1ST District Delegates for Mondale	C00176909	$ 5,000.00
NY - At-Large Delegates for Mondale	C00181016	$ 2,500.00
	Chart I TOTAL	$ 8,500.00

BRICKLAYERS AND ALLIED CRAFTSMEN
C00003632

RECIPIENT	IDENTIFICATION	AMOUNT
IL - 7TH C.D. Delegates for Mondale	C00178244	$ 500.00
NH - NH 1ST District Delegates for Mondale	C00176909	$ 5,000.00
PA - Delegates At-Large for Mondale	C00180679	$ 2,000.00
	Chart I Sub-Total	$ 7,500.00
PA - 18TH C.D. Delegates for Mondale	C00180729	$ 3,000.00
	Chart III Sub-Total	$ 3,000.00
	TOTAL	$10,500.00

MACHINISTS NON-PARTISAN POLITICAL LEAGUE
C00002469

RECIPIENT	IDENTIFICATION	AMOUNT
MD - Montgomery County for Mondale Delegate Committee	C00180992	$ 500.00
MD - Montgomery County for Mondale Delegate Committee	C00180992	[$500.00]
NY - At-Large Delegates for Mondale	C00181016	$ 5,000.00
PA - 14TH C.D. Delegates for Mondale	C00180562	$ 2,400.00
	CHart I Sub-Total	$ 7,400.00
NY - Northern NY Delegates for Mondale	C00180190	$ 1,000.00
	Chart III Sub-Total	$ 1,000.00
	TOTAL	$ 8,400.00

UNITED STEELWORKERS OF AMERICA PAC
C00003590

RECIPIENT	IDENTIFICATION	AMOUNT
IL - Delegates for Mondale Committee - 21ST C.D.	C00176933	$ 1,000.00
PA - Mondale Delegates - 20TH District	C00180737	$ 2,000.00
PA - 4TH District Delegates for Mondale	C00179846	$ 2,000.00
PA - Mondale Delegate Committee - 12TH C.D.	C00178954	$ 2,000.00*
	Chart I TOTAL	$ 7,000.00

CARPENTERS LEGISLATIVE IMPROVEMENT COMMITTEE
C00001016

RECIPIENT	IDENTIFICATION	AMOUNT
FL - South Florida Delegates for Mondale	C00176875	$ 1,000.00
IL - 20TH C.D. Delegates for Mondale	C00177881	$ 5,000.00
	Chart I TOTAL	$ 6,000.00

ENGINEERS POLITICAL EDUCATION COMMITTEE
C00029504

RECIPIENT	IDENTIFICATION	AMOUNT
NY - Erie County Delegates for Mondale	C00181305	$ 5,000.00
	Chart I Sub-Total	$ 5,000.00
NY - 27TH C.D. Delegation for Mondale	C00181586	$ 2,000.00
DC - Mondale Delegates - DC	C00182550	$ 850.00
DC - Mondale Delegates - DC	C00182550	$ 150.00
PA - At-Large Delegates for Mondale	C00180679	$ 3,500.00
PA - 10TH C.D. Delegates for Mondale	C00180141	$ 4,000.00
	Chart III Sub-Total	$10,500.00
	TOTAL	$15,500.00

*Guaranteed Outstanding Contribution (Pledge).

IRONWORKERS POLITICAL ACTION LEAGUE
C00027359

RECIPIENT	IDENTIFICATION	AMOUNT
NY - At-Large Delegates for Mondale	C00181016	$ 1,000.00
NY - At-Large Delegates for Mondale	C00181016	$ 1,000.00
NY - At-Large Delegates for Mondale	C00181016	$ 1,000.00
NY - At-Large Delegates for Mondale	C00181016	$ 1,000.00
PA - 21ST Congressional 1984 Delegates for Mondale	C00179457	$ 1,000.00
Chart I Sub-Total		$ 5,000.00
PA At-Large Delegate for Mondale	C00180679	$ 2,000.00
PA - At-Large Delegate for Mondale	C00180679	$ 1,000.00
PA - At-Large Delegate for Mondale	C00180679	$ 1,000.00
PA - At-Large Delegate for Mondale	C00180679	$ 1,000.00
PA - At-Large Delegate for Mondale	C00180679	[$1,000.00]
IL - 3RD C.D. of Illinois Mondale Delegate Committee	C00178715	$ 5,000.00
IL - 3RD C.D. of Illinois Mondale Delegate Committee	C00178715	$ 2,000.00
IL - 3RD C.D. of Illinois Mondale Delegate Committee	C00178715	[$5,000.00]
NY - At-Large Delegate Committee for Mondale	C00181016	$ 1,000.00
NY - At-Large Delegate Committee for Mondale	C00181016	[$1,000.00]
PA - 18TH C.D. of PA Delegate for Mondale	C00180729	$ 150.00
Chart III Sub-Total		$ 6,150.00
TOTAL		$11,150.00

UFCW ACTIVE BALLOT CLUB
C00002766

RECIPIENT	IDENTIFICATION	AMOUNT
NH - NH 2ND District Delegates for Mondale	C00176891	$ 5,000.00
Chart I Sub-Total		$ 5,000.00
VA - Mondale 2ND C.D. Delegate Recruitment Committee	Not Registered	$ 5,000.00
KY - Kentucky At-Large Mondale Committee	C00181024	$ 5,000.00
PA - At-Large Delegates for Mondale Committee	C00180679	$ 5,000.00
NY - State At-Large Delegate Committee for Mondale	C00181016	$ 5,000.00
NY - Committee for Western New York Mondale Delegates	C00180208	$ 2,000.00
Chart III Sub-Total		$22,000.00
TOTAL		$27,000.00

ACTWU-COPE (ILLINOIS)
C00026096

RECIPIENT	IDENTIFICATION	AMOUNT
IL - 7TH C.D. Delegates for Mondale	C00178244	$ 4,000.00
	Chart I	

BROWARD FEDERAL SAVINGS AND LOAN PAC (NOT QUALIFIED)
C00136945

RECIPIENT	IDENTIFICATION	AMOUNT
FL - Mondale 15TH District Delegate Committee	C00176644	$ 2,500.00
FL - Mondale 16TH District Delegate Committee	C00175950	$ 1,400.00
	Chart I TOTAL	$ 3,900.00

IBEW LOCAL UNION 915 PAC
C00140749

RECIPIENT	IDENTIFICATION	AMOUNT
FL - C.D. 10 Delegates for Mondale	C00178939	$ 1,000.00
FL - C.D. 7 Delegates for Mondale	C00178947	$ 1,000.00
FL - Mondale Delegates C.D. 8	C00178145	$ 1,000.00
	Chart I TOTAL	$ 3,000.00

INDEPENDENT POLITICAL ACTION COMMITTEE (OF BROWARD COUNTY)
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
FL - Mondale 15TH District Delegate Committee	C00176644	$ 500.00
FL - Mondale 16TH District Delegate Committee	C00175950	$ 2,000.00
	Chart I TOTAL	$ 2,500.00

IRONWORKERS LOCAL 397
C00111922

RECIPIENT	IDENTIFICATION	AMOUNT
FL - C.D. 7 Delegates for Mondale	C00178947	$ 1,000.00
FL - C.D. 9 Delegates for Mondale	C00178475	$ 1,000.00
	Chart I TOTAL	$ 2,000.00

ELECTROPAC 728 (IBEW)
C00113225

RECIPIENT	IDENTIFICATION	AMOUNT
FL - Mondale 16TH District Delegate Committee	C00175950	$ 1,700.00
	Chart I	

SOUTH FLORIDA IRONWORKERS 272 PAC
C00133330

RECIPIENT	IDENTIFICATION	AMOUNT
FL - South Florida Delegates for Mondale	C00176875	$ 1,000.00
	Chart I	

UNITED ASSOCIATION 725 PIPEFITTERS AIR-CONDITIONING PAC
C00160507

RECIPIENT	IDENTIFICATION	AMOUNT
FL - Mondale 15TH District Delegate Committee	C00176644	$ 250.00
FL - South Florida Delegates for Mondale	C00176875	$ 500.00
FL - Mondale 16TH District Delegate Committee	C00175950	$ 250.00
	Chart I	
	TOTAL	$ 1,000.00

LOCAL 349 ELECTROPAC FUND (IBEW)
C00136689

RECIPIENT	IDENTIFICATION	AMOUNT
FL - South Florida Delegates for Mondale	C00176875	$ 1,000.00
	Chart I	

PLUMBERS LOCAL UNION 519
C00143362

RECIPIENT	IDENTIFICATION	AMOUNT
FL - South Florida Delegates for Mondale	C00176875	$ 1,000.00

Chart I

BAKERY CONFECTIONARY TOBACCO WORKERS PAC
C00127621

RECIPIENT	IDENTIFICATION	AMOUNT
IL - 1ST C.D. Delegates for Walter Mondale	C00178236	$ 1,000.00

Chart I

SUBWAY SURFACE SUPERVISORS PAC
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
NY - Mondale 17TH C.D. Delegate Committee	C00176883	$ 500.00

Chart I

CONSOLIDATED LOCAL UNION 177 OUTSIDE - INSIDE PAC
C00139683

RECIPIENT	IDENTIFICATION	AMOUNT
FL - Delegates for Mondale	C00178509	$ 500.00

Chart I

WOMANPOWER CAMPAIGN
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
NY - Mondale 17TH C.D. Delegate Committee	C00176883	$ 500.00

Chart I

CARPENTERS LOCAL 845 PAC
C00152132

RECIPIENT	IDENTIFICATION	AMOUNT
PA - 7TH C.D. Mondale Delegates	C00180398	$ 500.00

Chart I

CARPENTERS DISTRICT COUNCIL OF MADISON COUNTY AND VICINITY ILLINOIS
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
IL - Delegates for Mondale - 21ST C.D.	C00176933	$ 250.00

Chart I

SEIU - LOCAL 73
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
IL - 1ST C.D. Delegates for Walter Mondale	C00178236	$ 250.00

Chart I

SPRINGFIELD REGION L.P.L.
C00158071

RECIPIENT	IDENTIFICATION	AMOUNT
IL - 22ND C.D. Delegates for Mondale	C00177840	$ 250.00
	Chart I	

MACHINISTS CREDIT UNION
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
IL - Fourth District Mondale Delegate Committee	C00175596	$ 100.00
IL - Fourth District Mondale Delegate Committee	C00175596	$ 50.00
	Chart I TOTAL	$ 150.00

CARPENTERS AND JOINERS LOCAL 633 TRUSTEES
R AND C FUND
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
IL - Delegates for Mondale - 21ST C.D.	C00176933	$ 100.00
	Chart I	

CARPENTERS LOCAL UNION NO. 377
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
IL - Delegates for Mondale - 21ST C.D.	C00176933	$ 100.00
	Chart I	

ENGINEERS POLITICAL ACTION COMMITTEE - IUOE
C00132258

RECIPIENT	IDENTIFICATION	AMOUNT
FL - Northern 12TH C.D. Delegates for Mondale	C00178327	$ 100.00

Chart I

SOUTH CHICAGO RETIRED STEELWORKERS
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
IL - Second C.D. Delegates for Mondale	C00178251	$ 100.00

Chart I

POLITICAL EDUCATION LEGISLATIVE AND CHARITY
FUND LOCAL 27
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
IL - Delegates for Mondale - 21ST C.D.	C00176933	$ 100.00

Chart I

PAINTERS LOCAL 41 SOCIAL CLUB
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
PA - 11TH Congressional Delegates for Mondale	C00178467	$ 100.00

Chart I

UNITED LABOR COUNCIL SOCIAL CLUB
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
PA - 11TH Congressional Delegates for Mondale	C00178467	$ 100.00

Chart I

CENTRAL LABOR COUNCIL COPE
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
PA - 21ST Congressional 1984 Delegates for Mondale	C00179457	$ 100.00

Chart I

CENTRAL WESTMORELAND COUNTY LABOR
UNION COUNCIL AFL-CIO
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
PA - Mondale Delegate Committee - 12TH C.D.	C00178954	$ 100.00

Chart I

LOCAL 1357 PAC (UFCW)
(NOT QUALIFIED)
C00177113

RECIPIENT	IDENTIFICATION	AMOUNT
PA - Mondale Delegates Committee	C00178137	$ 100.00

Chart I

IUOE LOCAL 17 POLITICAL ACTION COMMITTEE
C00104455

RECIPIENT	IDENTIFICATION	AMOUNT
NY - Erie County Delegates for Mondale	C00181305	$ 50.00
	Chart I Sub-Total	$ 50.00
NY - Erie County Delegates for Mondale	C00181305	$ 50.00
	Chart III Sub-Total	$ 50.00
	TOTAL	$ 100.00

SHEETMETAL WORKERS LOCAL 44 PAC
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
PA - 11TH Congressional Delegates for Mondale	C00178467	$ 59.00
	Chart I	

UNITED BROTHERHOOD OF CARPENTERS NO. 1808
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
IL - Delegates for Mondale - 21ST C.D.	C00176933	$ 50.00
	Chart I	

CARPENTERS LOCAL UNION NO. 295
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
IL - Delegates for Mondale - 21ST C.D.	C00176933	$ 50.00
	Chart I	

CARPENTERS DISTRICT COUNCIL PAC
C00129940

RECIPIENT	IDENTIFICATION	AMOUNT
PA - Mondale Delegates - 20TH District	C00180737	$ 50.00
	Chart I	

LOCAL 25 POLITICAL AND EDUCATION COMMITTEE
C00137794

RECIPIENT	IDENTIFICATION	AMOUNT
IL - Second C.D. Delegates for Mondale	C00178251	$ 50.00
	Chart I	

UFCW LOCAL 722 PAC
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
PA - 11TH Congressional Delegates for Mondale	C00178467	$ 50.00
	Chart I	

PLUMBERS LOCAL UNION 27 POLITICAL ACITON COMMITTEE
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
PA - Mondale Delegates - 20TH District	C00180737	$ 50.00

Chart I

PIPEFITTERS LOCAL 524 PAC
C00131706

RECIPIENT	IDENTIFICATION	AMOUNT
PA - 11TH Congressional Delegates for Mondale	C00178467	$ 40.00

Chart I

WOMEN OF POLITICAL ACTION
(NOT QUALIFIED)
C00179556

RECIPIENT	IDENTIFICATION	AMOUNT
PA - 4TH District Delegates for Mondale	C00179846	$ 30.00

Chart I

WILL-GRUNDY COUNTIES CENTRAL TRADES AND LABOR COUNCIL (NOT QUALIFIED)
C00021907

RECIPIENT	IDENTIFICATION	AMOUNT
IL - Fourth District Mondale Delegate Committee	C00175596	$ 200.00
IL - Fourth District Mondale Delegate Committee	C00175596	[$200.00]

Chart I
TOTAL $ 0

FRIENDS OF PETER SHAPIRO
(NOT QUALIFIED)
C00167114

RECIPIENT	IDENTIFICATION	AMOUNT
NH - NH 2ND District Delegates for Mondale	C00176891	$ 1,000.00
	Chart I	

CAMPAIGN FUND FOR PINELLAS FOR PROGRESS
(NOT QUALIFIED)
C00177105

RECIPIENT	IDENTIFICATION	AMOUNT
FL - Mondale Delegates C.D. 8	C00178145	$ 300.00
	Chart I	

HOYER FOR CONGRESS
C00140715

RECIPIENT	IDENTIFICATION	AMOUNT
MD - Prince George's Delegates for Mondale	C00181602	$ 2,500.00
MD - Prince George's Delegates for Mondale	C00181602	$ 2,500.00
	Chart I	
	TOTAL	$ 5,000.00

CITIZENS FOR SINGER
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
IL - Ninth District Mondale Delegate Committee	C00176180	$ 400.00
IL - Ninth District Mondale Delegate Committee	C00176180	$ 1,000.00
	Chart I	
	TOTAL	$ 1,400.00

RUSSO FOR CONGRESS COMMITTEE
C00049635

RECIPIENT	IDENTIFICATION	AMOUNT
IL - Second C.D. Delegates for Mondale	C00178251	$ 300.00
IL - Third C.D. Delegates for Mondale	C00178715	$ 300.00
IL - Third C.D. Delegates for Mondale	C00178715	$ 700.00
	Chart I TOTAL	$ 1,300.00

CITIZENS FOR SARBANES
C00029777

RECIPIENT	IDENTIFICATION	AMOUNT
MD - Third District Delegates for Mondale	C00179853	$ 1,000.00
	Chart I	

MIKULSKI FOR CONGRESS
C00036095

RECIPIENT	IDENTIFICATION	AMOUNT
MD - Third District Delegates for Mondale	C00179853	$ 1,000.00
	Chart I	

FAZIO FOR CONGRESS COMMITTEE
C00088773

RECIPIENT	IDENTIFICATION	AMOUNT
NH - NH 1ST District Delegates for Mondale	C00176909	$ 1,000.00
	Chart I	

COMMITTEE TO RE-ELECT SENATOR LEICHTER
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
NY - Mondale 17TH C.D. Delegate Committee	C00176883	$ 1,000.00
	Chart I	

FRIENDS OF DICK GOTTFRIED
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
NY - Mondale 17TH C.D. Delegate Committee	C00176883	$ 326.68
NY - Mondale 17TH C.D. Delegate Committee (In-Kind)	C00176883	$ 673.32
	Chart I	
	TOTAL	$ 1,000.00

MURTHA FOR RE-ELECTION COMMITTEE
C00019075

RECIPIENT	IDENTIFICATION	AMOUNT
PA - Mondale Delegate Committee - 12TH C.D.	C00178954	$ 1,000.00*
	Chart I	

1984 ENDORSED DEMOCRATIC CANDIDATE COMMITTEE
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
NY - Erie County Delegates for Mondale	C00181305	$ 850.00
	Chart I	

*Guaranteed Outstanding Contribution (Pledge)

I'M FOR JOE COMMITTEE
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
NY - Erie County Delegates	C00181305	$ 750.00
	Chart I	

CITIZENS FOR ROMAN
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
IL - Eleventh District Mondale Delegate Committee	C00175828	$ 500.00
	Chart I	

CITIZENS FOR VRDOLYAK
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
IL - Second C.D. Delegates for Mondale	C00178251	$ 500.00
	Chart I	

FRIENDS OF RUTH MESSINGER
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
NY - Mondale 17TH C.D. Delegate Committee	C00176883	$ 500.00
	Chart I	

FRIENDS OF OLIVER KOPPELL
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
NY - Mondale 17TH C.D. Delegate Committee	C00176883	$ 250.00

Chart I

CITIZENS FOR LAWRENCE GULOTTA
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
IL - Second C.D. Delegates for Mondale	C00178251	$ 50.00

Chart I

FRIENDS OF JIM KRANE
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
NY - Erie County Delegates for Mondale	C00181305	$ 50.00

Chart I

MUSTO SENATE COMMITTEE
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
PA - 11TH Congressional Delegates for Mondale	C00178467	$ 20.00

Chart I

CITIZENS FOR DAVID E. JACKSON
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
IL - Second C.D. Delegates for Mondale	C00178251	$ 20.00
	Chart I	

WILLIAM MOROVITZ CAMPAIGN FUND
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
IL- Ninth District Mondale Delegate Committee	C00176180	$ 500.00
IL- Ninth District Mondale Delegate Committee	C00176180	$ 500.00
IL- Ninth District Mondale Delegate Committee	C00176180	[$1,000.00]
	Chart I TOTAL	$ 0

CITIZENS FOR JOHN CULLERTON
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
IL- Ninth District Mondale Delegate Committee	C00176180	$ 500.00
IL- Ninth District Mondale Delegate Committee	C00176180	[$ 500.00]
	Chart I TOTAL	$ 0

ANSONIA INDEPENDENT DEMOCRATS
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
NY - Mondale 17TH C.D. Delegate Committee	C00176883	$ 1,500.00

Chart I

38TH WARD REGULAR DEMOCRATIC ORGANIZATION
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
IL - Eleventh District Mondale Delegate Committee	C00175828	$ 500.00

Chart I

PERRY COUNTY DEMOCRATIC PARTY
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
IL - 22ND C.D. Delegates for Mondale	C00177840	$ 200.00

Chart I

CHEEKTOWAGA DEMOCRATIC TOWN COMMITTEE
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
NY - Erie County Delegates for Mondale	C00181305	$ 100.00

Chart I

ASHCRAFT AND GERREL
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
DC - Mondale Delegates - DC	C00182550	$ 300.00
DC - Mondale Delegates - DC	C00182550	$ 250.00
	Chart I TOTAL	$ 550.00

KOONZ, MCKENNEY AND JOHNSON
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
DC - Mondale Delegates - DC	C00182550	$ 300.00
	Chart I	

MILLER AND LEHER
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
CO - Mondale Colorado Delegate Selection Committee	C00181412	$ 500.00
	Chart I	

1901 LTD (A PARTNERSHIP)
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
CO - Mondale Colorado Delegate Selection Committee	C00181412	$ 500.00
	Chart I	

E.M.F. AND ASSOCIATES
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
FL - South Florida Delegates for Mondale	C00176875	$ 100.00

Chart I

EXCEL CLEANERS
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
IL - Delegates for Mondale Committee - 21ST C.D.	C00176933	$ 100.00

Chart I

VANDALIA BUS LINES
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
IL - Delegates for Mondale Committee - 21ST C.D.	C00176933	$ 25.00

Chart I

GENE'S HARVEY AUTO REPAIR
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
IL - Second C.D. Delegates for Mondale	C00178251	$ 200.00

Chart I

DON'S AUTO BODY
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
IL - Second C.D. Delegates for Mondale	C00178251	$ 50.00
	Chart I	

REGAL DRUG COMPANY INC.
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
IL - Second C.D. Delegates for Mondale	C00178251	$ 20.00
	Chart I	

NIEMEYER INC. DBA O'BRIEN'S PUB
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
IL - Second C.D. Delegates for Mondale	C00178251	$ 20.00
	Chart I	

MULTIMEDIA CABLEVISION INC.
DBA CABLEVISION OF HARVEY
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
IL - Second C.D. Delegates for Mondale	C00178251	$ 20.00
	Chart I	

BABE'S CLUB
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
IL - Second C.D. Delegates for Mondale	C00178251	$ 20.00
	Chart I	

6504051941

TASH INC.
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
IL - Second C.D. Delegates for Mondale	C00178251	$ 50.00
	Chart I	

GM CONSTRUCTION
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
IL - Second C.D. Delegates for Mondale	C00178251	$ 50.00
	Chart I	

MOSKOWITZ AND MOLL
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
NY - Mondale 17TH C.D. Delegate Committee	C00176883	$ 250.00
	Chart I	

SEBALD DAIRY FARMS
NOT REGISTERED

RECIPIENT	IDENTIFICATION	AMOUNT
PA - 21ST Congressional 1984 Delegates for Mondale	C00179457	$ 50.00
	Chart I	

NAME OF POLITICAL COMMITTEE NOT DISCLOSED

RECIPIENT	IDENTIFICATION	AMOUNT
PA - 22ND C.D. Delegate Committee for Mondale	C00180166	$ 5,000.00A/

Chart I

NAME OF POLITICAL COMMITTEE NOT DISCLOSED

RECIPIENT	IDENTIFICATION	AMOUNT
PA - 22ND C.D. Delegate Committee for Mondale	C00180166	$ 2,000.00B/

Chart I

NAME OF POLITICAL COMMITTEE NOT DISCLOSED

RECIPIENT	IDENTIFICATION	AMOUNT
FL - Delegates for Mondale	C00178509	$ 2,000.00C/

Chart I

A/ This contribution is noted on the Detailed Summary Page as being from a Political Committee; however, the itemization on Schedule A fails to disclose the name of the contributing committee.

B/ Ibid.

C/ This amount is disclosed on the Detailed Summary Page as being from a Political Committees; however, a supporting Schedule A has not been provided.

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 31, 1984

James M. Beck, Esquire
Pepper, Hamilton & Scheetz
20th Floor
The Fidelity Building
123 South Broad Street
Philadelphia, Pennsylvania 19109

Re: MUR 1667
Third, Twelfth and Nineteenth
Congressional District Delegates
Committees for Mondale (PA)

Dear Mr. Beck:

This responds to your letter dated May 24, 1984, wherein you requested an extension of time in which to submit a response to the complaint and its supplements in the above-captioned matter. The Commission has considered your request and on May 30, 1984, voted not to grant an extension.

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202)523-4143.

Sincerely,

Charles N. Steele
General Counsel

8504050197

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 31, 1984

Stuart H. Singer, Esquire
Greensberg, Travrig, Askew,
Hoffman, Lipoff, Rosen & Quentel, P.A.
Brickell Concours
1401 Brickell Building
Miami, Florida 33131

Re: MUR 1667
Eighth, Ninth and Fourteenth
Congressional District Delegate
Committees for Mondale (FL)

Dear Mr. Singer:

This responds to your letter dated May 4, 1984, wherein you requested an extension of time in which to submit a response to the complaint and its supplements in the above-captioned matter. The Commission has considered your request and on May 30 , 1984, voted not to grant an extension.

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202)523-4143.

Sincerely,

Charles N. Steele
General Counsel

8504050193

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 31, 1984

Kathleen N. Sullivan, Esquire
Waldleigh, Starr, Peters,
Dunn & Chiesa
95 Market Street
Manchester, New Hampshire 03101

Re: MUR 1667
New Hampshire 2nd District
Delegates for Mondale

Dear Ms. Sullivan:

This responds to your letter dated May 22, 1984, wherein you requested an extension of time in which to submit a response to the complaint and its supplements in the above-captioned matter. The Commission has considered your request and on May 30 , 1984, voted not to grant an extension.

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202)523-4143.

Sincerely,

Charles N. Steele
General Counsel

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1667
Mondale Delegate Committees)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on May 30, 1984, the Commission decided by a vote of 6-0 to take the following actions in MUR 1667:

1. Deny the request for an extension of time submitted by counsel to the Mondale delegate committees in the 8th, 9th and 14th Congressional Districts of Florida, submitted as Attachment 1 to the General Counsel's May 29, 1984 Memorandum to the Commission.

2. Deny the request for an extension of time submitted by the New Hampshire 2nd District Delegates for Mondale, submitted as Attachment 2 to the General Counsel's Memorandum to the Commission dated May 29, 1984.

3. Deny the request for an extension of time submitted by the counsel to the Mondale delegate committees in the 3rd, 12th and 19th Congressional Districts of Pennsylvania, submitted as Attachment 3 to the General Counsel's May 29, 1984 Memorandum to the Commission.

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

Attest:

May 31, 1984
Date

Jody C. Ranson
for Marjorie W. Emmons
Secretary of the Commission

8504030051 92

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 31, 1984

Kathleen N. Sullivan, Esquire
Waldleigh, Starr, Peters,
Dunn & Chiesa
95 Market Street
Manchester, New Hampshire 03101

Re: MUR 1667
New Hampshire 2nd District
Delegates for Mondale

Dear Ms. Sullivan:

This responds to your letter dated May 22, 1984, wherein you requested an extension of time in which to submit a response to the complaint and its supplements in the above-captioned matter. The Commission has considered your request and on May 30 , 1984, voted not to grant an extension.

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202)523-4143.

Sincerely,

Charles N. Steele
General Counsel

8504052007

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

84 MAY 29 P 3: 02

May 29, 1984

SENSITIVE

MEMORANDUM TO: The Commission

FROM: Charles N. Steele CNS/ksm
General Counsel

SUBJECT: Requests for Extensions of Time in MUR 1667

The Office of the General Counsel has received three additional requests for extensions of time submitted by delegate committees in MUR 1667. This Office has reviewed the attached requests and does not believe that the basis for any of the requests is, in light of the Commission's previously adopted position regarding such requests, sufficient to warrant an extension.

Recommendations

The Office of the General Counsel recommends, therefore, that the Commission:

1. deny the request for an extension of time submitted by counsel to the Mondale delegate committees in the 8th, 9th and 14th Congressional Districts of Florida (Attachment 1);

2. deny the request for an extension of time submitted by the New Hampshire 2nd District Delegates for Mondale (Attachment 2);

3. deny the request for an extension of time submitted by counsel to the Mondale delegate committees in the 3rd, 12th and 19th Congressional Districts of Pennsylvania (Attachment 3).

Attachments

1-3 Requests for extensions of time
4-6 Proposed letters

8504050520

HAND DELIVERED
84 MAY 25 A 9:56
CCC # 3313

LAW OFFICES
GREENBERG, TRAURIG, ASKEW, HOFFMAN, LIPOFF, ROSEN & QUENTEL

LINDA KOOBRICK ADLER
MICHAEL D. ALBERTINE
*CESAR L. ALVAREZ
/DOLPH F. ARAGON
CHARD A. ARKIN
*EUGIN O'D. ASKEW
JAMES L. BAGGHUS
HILARIE BASS
NORMAN J. BENFORD
MARK D. BLOOM
BURT BRUTON
STEVE BULLOCK
ROBERT K. BURLINGTON
ALAN R. CHASE
SUE H. COBB
KENDALL B. COFFEY
MARK B. DAVIS
ALAN T. DIMOND
CHARLES W. EDGAR, III
GARY M. EPSTEIN
THOMAS K. EQUELS
RICHARD B. GARRETT
LAWRENCE GODOFSKY
ALAN S. GOLD
HARVEY A. GOLDMAN
STEVEN E. GOLDMAN
STEVEN H. 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 S. KOBLOW
STEVEN J. KRAVITZ
STEVEN A. LANDY
STEVEN B. LAPIDUS
ALAN S. LEDERMAN
LAWRENCE D. LEVY
NORMAN H. LIPOFF
GARY D. LIPSON
CARLOS E. LOUNIET
JUAN P. LOUNIET
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 M. RUBENSTEIN
CLIFFORD A. SCHULMAN
MARK SCHWIMMER
MARTIN B. SHAPIRO
MARLENE R. SILVERMAN
STUART H. SINGER
TIMOTHY A. SMITH
DANIEL A. SUCHMAN
HERBERT H. SUSAN
YOLANDA MELLON TARAFA
ROBERT M. TRAURIG
STANLEY H. WAKSHLAS
JONATHAN H. WARNER
DAVID M. WELLS
JULIE A. S. WILLIAMSON
JERROLD A. WISH

AMBLER H. MOSS, JR.
ZACHARY H. WOLFF
OF COUNSEL

BRICKELL CONCOURS
801 BRICKELL AVENUE
MIAMI, FLORIDA 33131

TELEPHONES
MIAMI (305) 579-0500
BROWARD (305) 523-8111
TELEX 80-3364
TELECOPY (305) 579-0717
WRITER'S DIRECT NO.
(305) 579-0637

May 24, 1984

8 3 0 4 0 5 0 2 0 0

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.

Attachment 1
Page 1

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

8504052023

RECEIVED BY THE FEC
84 MAY 25 A8:51

MUR # 2210

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 G. WHEAT
WILLIAM S. BANNON
—
JOHN A. LASSEY
RONALD J. LAJOIE
KATHLEEN N. SULLIVAN
KATHERINE M. HANNA
JEFFREY H. KARLIN

May 22, 1984

84 MAY 23 P10:23

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

Attachment 2

8 5 0 4 0 3 0 5 2 9 4

RECEIVED BY THE FEC
84 MAY 25 A 9:57
GCC #3314

PEPPER, HAMILTON & SCHEETZ

ATTORNEYS AT LAW

1777 F STREET, N.W.
WASHINGTON, D.C. 20006
202-842-8100

50 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
215-893-3000
CABLE ADDRESS "PEPHIL PHILADELPHIA"
TELECOPIER (#465) 215-732-0668 · (#200) 215-988-0884
DEX (#4100) 215-848-2477 · TWX 710-670-0777

LOS ANGELES, CA 90014
213-617-5161

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) 893-3000

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.

8504005205

Attachment 3
Page 1

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

SMH/lk

Enclosure

8504050520 5

Attachment 3
Page 2

HAND DELIVERED
84 MAY 25 A9:57

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) 359-4146

RECEIVED MAY 21 1984

Attachment 3
Page 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Stuart H. Singer, Esquire
Greensberg, Travrig, Askew,
Hoffman, Lipoff, Rosen & Quentel, P.A.
Brickell Concours
1401 Brickell Building
Miami, Florida 33131

Re: MUR 1667
Eighth, Ninth and Fourteenth
Congressional District Delegate
Committees for Mondale (FL)

Dear Mr. Singer:

This responds to your letter dated May 4, 1984, wherein you requested an extension of time in which to submit a response to the complaint and its supplements in the above-captioned matter. The Commission has considered your request and on , 1984, voted not to grant an extension.

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202)523-4143.

Sincerely,

Charles N. Steele
General Counsel

Attachment 4

8504050520 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Kathleen N. Sullivan, Esquire
Waldleigh, Starr, Peters,
Dunn & Chiesa
95 Market Street
Manchester, New Hampshire 03101

Re: MUR 1667
New Hampshire 2nd District
Delegates for Mondale

Dear Ms. Sullivan:

This responds to your letter dated May 22, 1984, wherein you requested an extension of time in which to submit a response to the complaint and its supplements in the above-captioned matter. The Commission has considered your request and on , 1984, voted not to grant an extension.

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202)523-4143.

Sincerely,

Charles N. Steele
General Counsel

8504055207

Attachment 5

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

James M. Beck, Esquire
Pepper, Hamilton & Scheetz
20th Floor
The Fidelity Building
123 South Broad Street
Philadelphia, Pennsylvania 19109

Re: MUR 1667
Third, Twelfth and Nineteenth
Congressional District Delegates
Committees for Mondale (PA)

Dear Mr. Beck:

This responds to your letter dated May 24, 1984, wherein you requested an extension of time in which to submit a response to the complaint and its supplements in the above-captioned matter. The Commission has considered your request and on , 1984, voted not to grant an extension.

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202)523-4143.

Sincerely,

Charles N. Steele
General Counsel

8504052100

Attachment 6

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 31, 1984

David M. Ifshin, Esquire
Carolyn U. Oliphant, Esquire
Mondale for President Committee, Inc.
2201 Wisconsin Avenue
Suite 100
Washington, D.C. 20007

MUR 1667

Dear Mr. Ifshin and Ms. Oliphant:

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, April 27 and May 2, 1984, the Commission received supplemental submissions from the complainant. Copies of those submissions have been forwarded to you.

On May 22, 1984, the Commission received another submission from the complainant also pertaining to the allegations in the complaint. A copy of that submission was forwarded to you on May 25, 1984. A separate letter from the Office of the General Counsel was delivered to you on that day indicating that the Commission would decide whether the additional materials that were submitted on May 22, 1984, would be considered as a supplement or as an amendment to the complaint.

On May 30, 1984, the Commission considered the matter and determined that the materials that were submitted by the complainant on May 22, 1984, constitute a supplement to the complaint. Therefore, the Commission will proceed with its consideration of this matter pursuant to your earlier notifications. Accordingly, submission of this additional material will not result in a specific time period for response.

8504052111

The Commission also considered on May 30, 1984, the complainant's request for immediate injunctive relief in this matter. The Commission voted to deny the request. The Commission will, of course, 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 attorney assigned to this matter at (202)523-4143.

Sincerely,

Charles N. Steele
General Counsel

8504050521 2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 31, 1984

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

Re: MUR 1667

Dear Mr. Quinn:

This responds to your request of May 22, 1984, wherein you urged the Commission to act expeditiously to resolve the matters raised in the complaint filed by you. You also specifically requested that the Commission seek immediate injunctive relief.

The Commission has considered your request and on May 30, 1984, voted to deny your request for immediate injunctive relief. The Commission is of the opinion that, in light of the present circumstances, a move by it to seek injunctive relief at this juncture would be inappropriate.

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at 523-4143.

Sincerely,

Charles N. Steele
General Counsel

BEFORE THE FEDERAL ELECTION COMMISSION

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

CERTIFICATION

I, Mary W. Dove, Recording Secretary for the Federal Election Commission executive session of May 30, 1984, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 1667:

1. Consider the material submitted by the complainant to the Commission on May 22, 1984, as a supplement to the complaint.

2. Deny the complainant's request for injunctive relief at this time.

3. Authorize the Office of General Counsel to send the letters, submitted as Attachments 1 and 2, to the May 29, 1984, Memorandum to the Commission.

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

Attest:

5-30-84
Date

Mary W. Dove
Recording Secretary

8504052213

SENSITIVE

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Submitted Late

84 MAY 29 P3: 43

May 29, 1984

EXECUTIVE SESSION

MAY 30 1984

MEMORANDUM TO: The Commission

FROM: Charles N. Steele CNS (LMW)
General Counsel

SUBJECT: Additional Materials Received from the Complainant in MUR 1667

On May 22, 1984, the Office of the General Counsel received additional materials from the complainant in MUR 1667. Copies of the submission have been forwarded to each respondent in this matter. This Office has conducted a review of the material and does not believe that it raises new allegations or legal issues. Accordingly, the Office of the General Counsel recommends that this submission be considered as a supplement rather than as an amendment to the complaint.

In its submission, the complainant urges the Commission to act expeditiously to resolve the matter. The complainant, relying upon press accounts erroneously concludes that the post probable cause conciliation process has been initiated and suggests that the process be concluded within the 15 day period under 11 C.F.R. § 111.18(c). The Commission has, of course, only found reason to believe and specifically rejected an immediate proposal submitted by the Mondale for President Committee, Inc., (MPC) for conciliation prior to a finding of probable cause. In making the decision not to enter conciliation at that time, the Commission expressed the view that it preferred a more fully developed set of facts regarding not only MPC's involvement, but involvement by the delegate committees as well. As the Commission is aware, we are in the process of gathering factual data from all of the parties in the case.

The complainant also urges that the Commission seek immediate injunctive relief. The complainant contends that MPC still has the full benefit of the funds from the contributors to the delegate committees insofar as it has not yet repaid the portions of the contributions that would be viewed as excessive assuming the delegate committees are affiliates of MPC. The Office of the General Counsel has forwarded to the Commission

8504052114

certain specific proposals by MPC to resolve this matter. This office believes, therefore, that in light of the ongoing investigation in this matter and MPC's continuing efforts to resolve this issue, a move by the Commission to seek injunctive relief at this juncture is inappropriate.

Recommendations

1. Consider the materials submitted by the complainant to the Commission on May 22, 1984, as a supplement to the complaint.

2. Deny the complainant's request for injunctive relief at this time.

3. Approve and send the attached letters.

Attachments

1-2 Proposed letters

8504050521

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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

Re: MUR 1667

Dear Mr. Quinn:

This responds to your request of May 22, 1984, wherein you urged the Commission to act expeditiously to resolve the matters raised in the complaint filed by you. You also specifically requested that the Commission seek immediate injunctive relief.

The Commission has considered your request and on May , 1984, voted to deny your request for immediate injunctive relief. The Commission is of the opinion that, in light of the present circumstances, a move by it to seek injunctive relief at this juncture would be inappropriate.

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Attachment 1

8504050215

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

David M. Ifshin, Esquire
Carolyn U. Oliphant, Esquire
Mondale for President Committee, Inc.
2201 Wisconsin Avenue
Suite 100
Washington, D.C. 20007

MUR 1667

Dear Mr. Ifshin and Ms. Oliphant:

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, April 27 and May 2, 1984, the Commission received supplemental submissions from the complainant. Copies of those submissions have been forwarded to you.

On May 22, 1984, the Commission received another submission from the complainant also pertaining to the allegations in the complaint. A copy of that submission was forwarded to you on May 25, 1984. A separate letter from the Office of the General Counsel was delivered to you on that day indicating that the Commission would decide whether the additional materials that were submitted on May 22, 1984, would be considered as a supplement or as an amendment to the complaint.

On May , 1984, the Commission considered the matter and determined that the materials that were submitted by the complainant on May 22, 1984, constitute a supplement to the complaint. Therefore, the Commission will proceed with its consideration of this matter pursuant to your earlier notifications. Accordingly, submission of this additional material will not result in a specific time period for response.

8504052217

Attachment 2
Page 1

The Commission also considered on , 1984, the complainant's request for immediate injunctive relief in this matter. The Commission voted to deny the request. The Commission will, of course, 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 attorney assigned to this matter at (202)523-4143.

Sincerely,

Charles N. Steele
General Counsel

8504050219

Attachment 2
Page 2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 31, 1984

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

Re: MUR 1667

Dear Mr. Quinn:

This responds to your request of May 22, 1984, wherein you urged the Commission to act expeditiously to resolve the matters raised in the complaint filed by you. You also specifically requested that the Commission seek immediate injunctive relief.

The Commission has considered your request and on May 30, 1984, voted to deny your request for immediate injunctive relief. The Commission is of the opinion that, in light of the present circumstances, a move by it to seek injunctive relief at this juncture would be inappropriate.

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at 523-4143.

Sincerely,

Charles N. Steele
General Counsel

8504030521 9

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 31, 1984

Alan A. Garfinkel, Esquire
Berkman Ruslander Pohl & Engel
40th Floor
One Oxford Centre
Pittsburgh, Pennsylvania 15219-6498

Re: MUR 1667
Pennsylvania 18th Congressional
District Delegates for Mondale

Dear Mr. Garfinkel:

This responds to your letter dated May 23, 1984, wherein you requested an extension of time in which to submit a response to the complaint and its supplements in the above-captioned matter. The Commission has considered your request and on May 30, 1984, voted not to grant an extension.

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202)523-4143.

Sincerely,

Charles N. Steele
General Counsel

8504050220

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 31, 1984

Jeanne Connelly, Esquire
Steptoe and Johnson
1250 Connecticut Avenue
Washington, D.C. 20036

Re: MUR 1667
North Dakota Delegates for
Mondale Committee

Dear Ms. Connelly:

This responds to your letter dated May 22, 1984, wherein you requested an extension of time in which to submit a response to the complaint and its supplements in the above-captioned matter. The Commission has considered your request and on May 30, 1984, voted not to grant an extension.

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202)523-4143.

Sincerely,

Charles N. Steele
General Counsel

8504050221

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 31, 1984

Kevin D. O'Connor, Treasurer
Fifth District Mondale Delegate
Committee (WI)
538 N 32
Milwaukee, Wisconsin 53208

Re: MUR 1667

Dear Mr. O'Connor:

This responds to your request of May 18, 1984, wherein you requested an extension of time in which to respond to the complaint and its supplements in the above-captioned matter. The Commission has considered your request and on May 30, 1984, voted to grant an extension of ten days. Your response should, therefore, be filed by June 1, 1984.

If you have any questions, please contact Stephen Mims the attorney assigned to this matter at (202)523-4143.

Sincerely,

Charles N. Steele
General Counsel

8504050522 2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Jeanne Connelly, Esquire
Steptoe and Johnson
1250 Connecticut Avenue
Washington, D.C. 20036

Re: MUR 1667
North Dakota Delegates for
Mondale Committee

Dear Ms. Connelly:

This responds to your letter dated May 22, 1984, wherein you requested an extension of time in which to submit a response to the complaint and its supplements in the above-captioned matter. The Commission has considered your request and on May , 1984, voted not to grant an extension.

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202)523-4143.

Sincerely,

Charles N. Steele
General Counsel

8504050523

SM 5/30

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Kevin D. O'Connor, Treasurer
Fifth District Mondale Delegate
Committee (WI)
538 N 32
Milwaukee, Wisconsin 53208

Re: MUR 1667

Dear Mr. O'Connor:

This responds to your request of May 18, 1984, wherein you requested an extension of time in which to respond to the complaint and its supplements in the above-captioned matter. The Commission has considered your request and on May , 1984, voted to grant an extension of ten days. Your response should, therefore, be filed by June 1, 1984.

If you have any questions, please contact Stephen Mims the attorney assigned to this matter at (202)523-4143.

Sincerely,

Charles N. Steele
General Counsel

8504050522 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Alan A. Garfinkel, Esquire
Berkman Ruslander Pohl & Engel
40th Floor
One Oxford Centre
Pittsburgh, Pennsylvania 15219-6498

Re: MUR 1667
Pennsylvania 18th Congressional
District Delegates for Mondale

Dear Mr. Garfinkel:

This responds to your letter dated May 23, 1984, wherein you requested an extension of time in which to submit a response to the complaint and its supplements in the above-captioned matter. The Commission has considered your request and on May , 1984, voted not to grant an extension.

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202)523-4143.

Sincerely,

Charles N. Steele
General Counsel

SM
5/30

8504055222

BEFORE THE FEDERAL ELECTION COMMISSION

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

CERTIFICATION

I, Mary W. Dove, Recording Secretary for the Federal Election Commission executive session of May 30, 1984, do hereby certify that the Commission decided by a vote of 5-1 to take the following actions in MUR 1667:

1. Deny the request of the Pennsylvania 18th Congressional District Delegates for Mondale for an extension of time to respond to the complaint and its supplements.

2. Grant the request of the Fifth District Mondale Delegate Committee (WI) for an extension of time to respond to the complaint and its supplements, 10 days.

3. Deny the request of the North Dakota Delegates for Mondale Committee for an extension of time to respond to the complaint and its supplements.

4. Authorize the Office of General Counsel to send the letters, submitted as Attachments 1-6, to the May 25, 1984, Memorandum to the Commission.

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

Attest:

5-30-84
Date

Mary W. Dove
Mary W. Dove
Recording Secretary

8504055225

SENSITIVE

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

84 MAY 25 P 4: 58

May 25, 1984

MEMORANDUM TO: The Commission

FROM: Charles N. Steele (CNS (GAW))
General Counsel

SUBJECT: Requests for Extensions in MUR 1667

The Office of the General Counsel has received additional requests from respondents in MUR 1667. Each request is summarized below:

1. Pennsylvania 18th Congressional District Delegates for Mondale (Attachment 1): Counsel cites his inability to meet with and discuss matters with his client due to the committee treasurer's absence from town for business reasons and counsel's trial schedule. The Office of the General Counsel does not believe the basis for the request is extraordinary and recommends, therefore, that the request for an extension not be granted.

2. Fifth District Mondale Delegate Committee (WI) (Attachment 2): The committee's treasurer cites as the basis for his request for an extension his unsuccessful efforts to obtain counsel. The Office of the General Counsel believes that an extension of 10 days should be afforded this committee.

3. North Dakota Delegates for Mondale Committee (Attachment 3): Counsel requests an extension due to the need to send documents between North Dakota and Washington, D.C. The Office of the General Counsel does not believe that the basis for the requested extension is extraordinary and recommends, accordingly, that the request not be granted.

Recommendations

1. Deny the request of the Pennsylvania 18th Congressional District Delegates for Mondale for an extension of time to respond to the complaint and its supplements.

2. Grant the request of the Fifth District Mondale Delegate Committee (WI) for an extension of time to respond to the

8504050227

complaint and its supplements, 10 days.

3. Deny the request of the North Dakota Delegates for Mondale Committee for an extension of time to respond to the complaint and its supplements.

4. Approve and send the attached letters.

Attachments
1-3 Requests for extension
4-6 Proposed letters

8504050522 3

THE FEC
Ca # 3300

BERKMAN RUSLANDER
POHL LIEBER & ENGEL

40th Floor, One Oxford Centre
Pittsburgh, Pennsylvania 15219-6498

May 23, 1984

ALAN A. GARFINKEL
(412) 392-2033

EXPRESS MAIL

Stephen Mims, Esquire
Federal Election Commission
Washington, DC 20463

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

8504052227

Attachment 1
Page 1

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84 MAY 24 AM 10:55

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

Arthur J. Rooney II
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

8504052300

Attachment 1
Page 2

RECEIVED BY THE FEC
84 MAY 23 A8:37

84 MAY 22 P0:26
84 MAY 22 P11:41

May 18, 1984

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

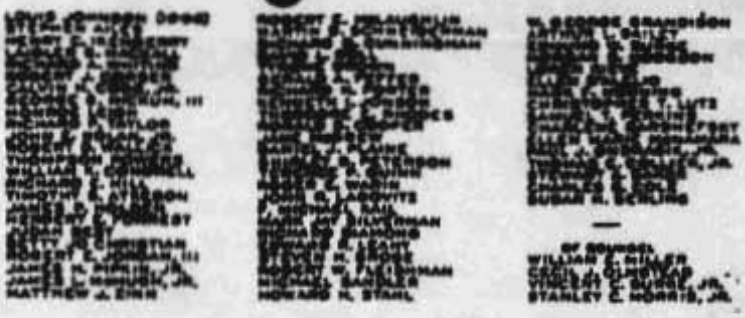
KDO/bd

84 MAY 22 P11:55

8504050231

Attachment 2

STEPTOE & JOHNSON
CHARTERED
1250 CONNECTICUT AVENUE
WASHINGTON, D.C. 20036
(202) 862-2000
TELEX 89-2503
WRITER'S DIRECT DIAL NUMBER



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

Attachment 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Alan A. Garfinkel, Esquire
Berkman Ruslander Pohl & Engel
40th Floor
One Oxford Centre
Pittsburgh, Pennsylvania 15219-6498

Re: MUR 1667
Pennsylvania 18th Congressional
District Delegates for Mondale

Dear Mr. Garfinkel:

This responds to your letter dated May 23, 1984, wherein you requested an extension of time in which to submit a response to the complaint and its supplements in the above-captioned matter. The Commission has considered your request and on May , 1984, voted not to grant an extension.

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202)523-4143.

Sincerely,

Charles N. Steele
General Counsel

8504055233

Attachment 4

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Jeanne Connelly, Esquire
Steptoe and Johnson
1250 Connecticut Avenue
Washington, D.C. 20036

Re: MUR 1667
North Dakota Delegates for
Mondale Committee

Dear Ms. Connelly:

This responds to your letter dated May 22, 1984, wherein you requested an extension of time in which to submit a response to the complaint and its supplements in the above-captioned matter. The Commission has considered your request and on May , 1984, voted not to grant an extension.

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202)523-4143.

Sincerely,

Charles N. Steele
General Counsel

8504055234

Attachment 5

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Kevin D. O'Connor, Treasurer
Fifth District Mondale Delegate
Committee (WI)
538 N 32
Milwaukee, Wisconsin 53208

Re: MUR 1667

Dear Mr. O'Connor:

This responds to your request of May 18, 1984, wherein you requested an extension of time in which to respond to the complaint and its supplements in the above-captioned matter. The Commission has considered your request and on May , 1984, voted to grant an extension of ten days. Your response should, therefore, be filed by June 1, 1984.

If you have any questions, please contact Stephen Mims the attorney assigned to this matter at (202)523-4143.

Sincerely,

Charles N. Steele
General Counsel

8504052352

Attachment 6

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 30, 1984

David M. Ifshin, Esq.
Carolyn U. Oliphant, Esq.
Mondale for President Committee, Inc.
Suite 100
2201 Wisconsin Avenue, N.W.
Washington, D.C. 20007

Re: MUR 1667
Mondale for President Committee, Inc.
Michael S. Berman, as treasurer

Dear Mr. Ifshin and Ms. Oliphant:

This acknowledges receipt of your letter concerning the escrowing and "refunding" of monies representing contributions received by the Mondale delegate committees from union political action committees. The Mondale for President Committee, Inc., is free to pursue whatever course of action it deems appropriate in possible mitigation of the violations alleged in MUR 1667. The Commission is unable to comment at this time on the legal implications of such action in view of the pendency of its own investigation into this matter.

If you wish to discuss this matter further please contact Stephen Mims, the attorney handling this matter at 523-4143.

Sincerely,

Charles N. Steele
General Counsel

8504052352

BEFORE THE FEDERAL ELECTION COMMISSION

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

CERTIFICATION

I, Mary W. Dove, Recording Secretary for the Federal Election Commission executive session of May 30, 1984, do hereby certify that the Commission took the following actions in MUR 1667:

1. Failed in a vote of 3-3 to approve letter, submitted as Attachment 2 to the May 30, 1984, Memorandum to the Commission from the Office of the General Counsel.

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

2. Decided by a vote of 5-1 to authorize the Office of General Counsel to send the letter, submitted as Attachment 1, to the May 30, 1984, Memorandum to the Commission, amended as follows:

   Delete the third sentence in Paragraph 1 and substitute in lieu thereof the following sentence:

   > The Commission is unable to comment at this time on the legal implications of such action in view of the pendency of its own investigation into this matter.

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

Attest:

5-30-84
Date

Mary W. Dove
Mary W. Dove
Recording Secretary

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SENSITIVE

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

84 MAY 30 P12: 28

May 30, 1984

MEMORANDUM

EXECUTIVE SESSION

MAY 30 1984

TO: The Commission

FROM: Charles N. Steele
General Counsel

SUBJECT: Proposal Submitted By The Mondale For President Committee, Inc.

Pursuant to the discussion in the Commission's Executive Session on May 30, 1984, of the memorandum from the Office of the General Counsel dated May 29, 1984, regarding the proposal submitteed by the Mondale for President Committee, Inc, the Office of the General Counsel has prepared two alternative letters to the Mondale for President Committee, Inc., for Commission consideration.

The first letter represents what the Office of the General Counsel perceived to the the consensus view of the Commission. This letter indicates that while the Mondale Committee is free to establish an escrow account and make the proposed payments to the union political action committees, the Commission is presently unable to give its endorsement to the proposals.

The second letter represents what the Office of the General Counsel preceived to be another view expressed in the meeting. This letter simply indicates that the Commission has no objection to the proposals submitted by the Mondale for President Committee, Inc.

Attachments
1-2 Draft letters to the Mondale for President Committee, Inc.

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

David M. Ifshin, Esq.
Carolyn U. Oliphant, Esq.
Mondale for President Committee, Inc.
Suite 100
2201 Wisconsin Avenue, N.W.
Washington, D.C. 20007

Re: MUR 1667
Mondale for President Committee, Inc.
Michael S. Berman, as treasurer

Dear Mr. Ifshin and Ms. Oliphant:

This acknowledges receipt of your letter concerning the escrowing and "refunding" of monies representing contributions received by the Mondale delegate committees from union political action committees. The Mondale for President Committee, Inc., is free to pursue whatever course of action it deems appropriate in possible mitigation of the violations alleged in MUR 1667. The Commission is unable at this stage of its investigation to give the Mondale for President Committee, Inc., any commitment that it will not regard the proposed "refunds" as evidence of affiliation with the delegate committees; nor would it be appropriate for the Commission to respond in any way to your general query whether "the Commission has any objection" to the proposed "refunds."

If you wish to discuss this matter further please contact Stephen Mims, the attorney handling this matter at 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Attachment 1

8504052039

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

David M. Ifshin, Esq.
Carolyn U. Oliphant, Esq.
Mondale for President Committee, Inc.
Suite 100
2201 Wisconsin Avenue, N.W.
Washington, D.C. 20007

Re: MUR 1667
Mondale for President Committee, Inc.
Michael S. Berman, as treasurer

Dear Mr. Ifshin and Ms. Oliphant:

This acknowledges receipt of your letter concerning the escrowing and "refunding" of monies representing contributions received by the Mondale delegate committees from union political action committees. The Commission has no objection to steps that you have outlined that the Mondale committee wishes to take in making "refunds" of contributions to the union political action committees that made contributions to the Mondale delegate committees, and would not treat such action as evidence of affiliation or find that it violates any other provision of the FECA.

If you have any questions, please contact Stephen Mims, the attorney handling this matter at 523-4143.

Sincerely,

Charles N. Steele
General Counsel

8504050240

Attachment 2

SENSITIVE

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

84 MAY 29 P 3: 43

Submitted late

May 29, 1984

EXECUTIVE SESSION

MAY 30 1984

MEMORANDUM TO: The Commission

FROM: Charles N. Steele CNS (Hand)
General Counsel

SUBJECT: Proposal Submitted by Mondale for President Committee, Inc., in MUR 1667

On May 22, 1984, the Office of the General Counsel received a proposal from the Mondale for President Committee, Inc., (MPC) for the repayment of funds received by the Mondale delegate committees (Attachment 1). The proposal is based upon the decision of Mr. Mondale to voluntarily treat the Mondale delegate committees as if they were affiliated with MPC (without conceding the ultimate legal issues raised in the MUR).

The committee informs the Commission that it has placed $400,000 into an escrow account from which MPC proposes to make direct refunds to the political action committees that made contributions to the delegate committees. The committee finally requests that the Commission not object to this proposal, but indicates that it would be reluctant to proceed with the refund if the Commission would "treat this action as evidence of affiliation or find that it violates any other provision of the FECA."

The Office of the General Counsel has considered MPC's request and makes the following comments and recommendations.

1. The escrow account: This Office has no objection to the establishment of an escrow account by MPC insofar as it relates to a vehicle for making contribution refunds. If, however, funds remain in such an account at the time that Mr. Mondale is no longer eligible to receive matching payments under 11 C.F.R. § 9033.5, the funds could be considered as assets of the committee and incorporated into MPC's NOCO statement and could affect entitlement to post ineligibility payment. The amount of funds that might necessarily be repaid to the treasury could be increased due to funds that remain in such an escrow account. Thus,

8504052411

should the Commission not object to the establishment of such a fund for this purpose, the General Counsel's Office believes that MPC should be cautioned concerning the possibility that the Commission would still view funds in the escrow account as assets of the committee at the date of candidate ineligibility. See 11 C.F.R. § 9034.5

2. Refunds by MPC of contributions made to the delegate committees: This office has substantial difficulties with MPC's proposal to make refunds to the PAC's that contributed to the delegate committees. This Office does not believe that sufficient facts have yet been developed and brought before the Commission that clarify the issues raised in this matter. Specifically, MPC has denied the legal issue of affiliation while indicating a desire to treat the delegate committees as affiliated for the purposes of resolving this matter. MPC proposes, therefore, that it would not be inconsistant to deny legal affiliation while acting as affiliated for the purposes of making contribution refunds to delegate committee contributors. This Office believes this plan raises at least the following issues:

a) Whether MPC's payment of funds to the delegate committee contributors would constitute evidence of affiliation between MPC and the delegate committees.

b) Whether such payments by MPC would constitute excessive contributions to the delegate committees.

c) Whether such payments by MPC constitute qualified campaign expenses.

The Office of the General Counsel further notes that we are not in a position at this time to confirm the amounts to be refunded to the political action committees under MPC's proposal. The Office of the General Counsel recommends, therefore, that the Commission approve and send the attached letter reflecting this discussion.

8504052422

Recommendation

Approve and send the attached letter.

Attachments

1. Letter 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

Mims

MONDALE

22 P3:27

FEC 3269

May 22, 1984

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

RE: MUR 1667

Dear Mr. Steele:

As we informed you on April 30, 1984, Mr. Mondale has instructed us to take the position for purposes of resolving this matter that the Committee would voluntarily treat Mondale delegate committees as though they were affiliated with Mondale for President Committee, Inc. As you are probably also aware, Mr. Mondale has made a commitment to refund all contributions given to delegate committees by political action committees. We had anticipated that the refund of these contributions would be one of the matters discussed in conciliation. Since the Commission rejected our request for informal conciliation at this time, it appears that these refunds cannot be part of the conciliation process if they are to be handled immediately.

Although conciliation will not begin now, Mr. Mondale still wants to fulfill his commitment to refund the PAC contributions as soon as possible. To this end, the Committee has placed $400,000 in an escrow account. We are in the process of determining from reports on file at the FEC the precise amount of PAC contributions. These amounts will be verified with the respective unions. Once this has been accomplished, we would like to refund the full amounts directly to the union PACs. This would be the least complicated means of accomplishing this goal. The Committee, of course, will report these disbursements and we will notify each delegate committee of the amount refunded so that their reports can be amended accordingly.

We hope that the Commission will have no objection to this plan. While the refunds would be premised on Mr. Mondale's voluntary decision to treat these committees as though affiliated, we do not believe the Committee should proceed if the Commission will treat this action as evidence of affiliation or find that it violates any other provision of the FECA.

In order to expedite this process, please advise us as soon

Attachment 1
Page 1

Paid for by Mondale for President, Inc.

as possible if the Commission has any objection to the actions outlined in this letter.

Sincerely,

David M. Ifshin
General Counsel

Carolyn U. Oliphant
Deputy General Counsel

8504050552441

Attachment 1
Page 2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

David M. Ifshin, Esq.
Carolyn U. Oliphant, Esq.
Mondale for President Committee, Inc.
Suite 100
2201 Wisconsin Avenue, N.W.
Washington, D.C. 20007

Re: MUR 1667
Mondale for President Committee, Inc.
Michael S. Berman, as treasurer

Dear Mr. Ifshin and Ms. Oliphant:

This acknowledges receipt of your letter concerning the escrowing and refunding of monies representing contributions received by the Mondale delegate committees from political action committees. Although the Commission has no objection to steps the Mondale committee may take in an effort to mitigate possible violations of the Act, we must advise you of some potential implications of carrying out your suggested course of action.

As to the establishment of an escrow account, we note that any funds in such an account would be considered Mondale committee assets. Such assets would be incorporated into the Mondale committees NOCO statement and could affect the committee's entitlement to post ineligibility payment. See 11 C.F.R. § 9034.1

The Mondale committee has also expressed its intention to refund the contributions made to the Mondale delegate committees by political action committees. With regard to that plan we note that so long as the Mondale committee maintains it is not affiliated with the delegate committees, such activity raises several legal issues, including:

1) Whether such payments constitute evidence that the Mondale committee is affiliated with the delegate committees;

2) Whether such payments constitute excessive contributions to the delegate committees by the Mondale committee; and

8504305245

Attachment 2
Page 1

3) Whether such payments constitute qualified campaign expenses pursuant to 26 U.S.C. § 9002(11).

In view of the ongoing investigation, it would be inappropriate for the Commission to respond to these issues at this time.

If you wish to discuss this matter further please contact Stephen Mims, the attorney handling this matter at 523-4143.

Sincerely,

Charles N. Steele
General Counsel

8504050245

Attachment 2
page 2

0-84-42

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 29, 1984

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

ATTENTION: STEPHEN MIMS

THROUGH: JOHN C. SURINA
STAFF DIRECTOR

FROM: JOHN D. GIBSON
ASSISTANT STAFF DIRECTOR
REPORTS ANALYSIS DIVISION

SUBJECT: DELEGATE COMMITTEE INFORMATION

Attached are two charts containing additional information on delegate committees. Pursuant to your request, Chart II has been expanded to include the addresses of the unregistered committees as well as a breakdown of the contributions made to them. If you have any questions regarding these charts, please let me know.

Attachment

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CHART II
POTENTIAL UNREGISTERED DELEGATE COMMITTEES
FROM SELECTED PAC REPORTS

Recipient	Contributions	Amount
-NY - The Mondale Team (32nd C.D.) 504 Witmar Road N. Tonawanda, NY 14120	AFSCME-PEOPLE AFT-COPE CWA-COPE	$1,215 $3,000 $ 500
-NY - 18th C.D. Delegate Committee for Mondale 888 Grand Concourse Bronx, NY 10451	AFSCME-PEOPLE AFSCME-PEOPLE	$ 350 $ 50
-NY - 15th C.D. Delegates Coalition for Mondale 235 East 87th Street New York, NY 10028	AFSCME-PEOPLE AFSCME-PEOPLE AFT-COPE	$ 960 $ 750 $ 750
-FL - C.D. 6 Delegates for Mondale 2375 S.W. College Road Ocala, FL 32674	AFT-COPE	$ 500
-FL - C.D. 11 Delegates for Mondale 981 Church Street Rockledge, FL 32955	AFT-COPE	$ 500
-MA - 6th District Delegate for Mondale c/o John G. VonDusen 38 Pond Street Marble Head, MA 01948	SEIU-COPE	$ 500
-OH - Ohio Mondale at Large Delegates State Committee Robert Malone, Treasurer 409 Brentwood Drive Marion, OH 43302	SEIU-COPE	$2,500
-PA - 15th C.D. Delegates for Mondale 4095 Tilghman Street Allentown, PA 18104	UAW V-CAP PA - At Large Delegates for Mondale	$ 500 $1,000

Recipient	Contributions	Amount
-VA - Mondale 2nd C.D. Delegate Recruitment Committee Pauline Davis, Treasurer 1007 Kempsville Road Virginia Beach, VA 23464	UPCW Active Ballot Club	$5,000
-PR - Delegates Committee With Mondale P.O. Box 4029 San Juan, PR 00905	AFL-CIO COPE	$5,000
-NY - West New York Elect Mondale Committee - 31st C.D. 201 Presidel Place Williamsville, NY 14221	AFT-COPE	$3,000
-MO - Western Missouri Mondale Delegate Committee 8037 Teasdale St. Louis, MO 63130	UAW V-CAP	$2,500

CHART III
DELEGATE COMMITTEE CONTRIBUTIONS

This is a listing of those committees that have made contributions to delegate committees and have not been disclosed on delegate committee reports.

Listed are:

- The name and identification number of each PAC making these contributions.
- The total amount of contributions reported received on the delegate committee reports. (See Chart I.)
- The amount of additional contributions made by the listed PAC as reported on their disbursement schedules (but not reported on delegate committee receipt schedules).

The column "Additional Contributions From PAC Schedule B's" was determined by checking those contributions reported as having been received on delegate committee reports against the corresponding PAC report. PAC contributions that were not found received on any delegate committee report were flagged and totalled per each PAC making such additional unreported contributions.

CHART III

DELEGATE COMMITTEE* CONTRIBUTIONS

Name	I.D. Number	Total From Delegate Committee Schedule A's Thru 5/8/84	Additional Contributions From PAC Schedule B's	Total Net Contribution
AFSCME-PEOPLE	C00011114	$50,270.00	$17,570.00	$67,840.00
UAW V-CAP	C00002840	$34,682.26	$22,000.00	$56,682.26
AFT-COPE	C00028860	$32,651.60	$20,850.00	$53,501.60
CWA-COPE	C00002089	$31,500.00	$ 500.00	$32,000.00
United Mine Workers of America PAC	C00013342	$20,000.00	$10,000.00	$30,000.00
UFCW-Active Ballot Club	C00002766	$ 5,000.00	$22,000.00	$27,000.00
SEIU-COPE	C00004036	$16,705.58	$ 3,000.00	$19,705.58
AFL-CIO COPE	C00003806	$13,636.64	$ 5,000.00	$18,636.64
Engineers Political Education Committee	C00029504	$ 5,000.00	$10,500.00	$15,500.00
Ironworkers Political Action League	C00027359	$ 5,000.00	$ 6,150.00	$11,150.00
Bricklayers and Allied Craftsmen	C00003632	$ 7,500.00	$ 3,000.00	$10,500.00
Machinists Non-Partisan Political League	C00002469	$ 7,400.00	$ 1,000.00	$ 8,400.00
IUOE Local 17 PAC	C00104455	$ 50.00	$ 50.00	$ 100.00

*These include the 130 registered delegate committees listed as respondents and the unregistered delegate committees listed on Chart II.

NRR
0-84-40
MUR 1667
Misc

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 25, 1984

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

ATTENTION: STEPHEN MIMS

THROUGH: JOHN C. SURINA
STAFF DIRECTOR

FROM: JOHN D. GIBSON
ASSISTANT STAFF DIRECTOR
REPORTS ANALYSIS DIVISION

SUBJECT: DELEGATE COMMITTEE INFORMATION

Attached are charts on information derived from reviewing the delegate committee reports. I am forwarding them to you for handling. These were generated as a result of the May 15 meeting held in the Staff Director's office. Each chart has a description of the information and the method used to derive it. Hopefully, these will be of some value to you. There will also be additional information which I hope to get to you by May 30. If you have any questions regarding these charts, please let me know.

Attachment

cc: Jim Pehrkon

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CHART I

This list of contributors was compiled by review of all delegate committee reports filed as of May 8, 1984.

Contributions reported on each delegate committee report were sorted according to contributor Name/Identification Number. In instances where names were not exactly the same, addresses were checked to determine the appropriate identification number. If an identification number could not be found for the reported entity making the contribution, then the entity was listed as "Not Registered." Once sorted, net aggregate totals were calculated for all contributions to delegate committees by a given contributor. The net aggregate total was determined by the addition of all reported contributions received less any returns or refunds of such contributions.

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DELEGATE COMMITTEE REPORTS
AS OF MAY 8, 1984

RECEIPTS REPORTED FROM PERSONS OTHER THAN INDIVIDUALS

NAME	I.D. NUMBER	NET CONTRIBUTIONS
1. AFSCME - PEOPLE	C00011114	$50,270.00
2. UAW V-CAP	C00002840	$34,682.26
3. AFT-COPE	C00028860	$32,651.60
4. CWA-COPE	C00002089	$31,500.00
5. United Mine Workers of America PAC	C00013342	$20,000.00
6. SEIU-COPE	C00004036	$16,705.58
7. AFL-CIO COPE	C00003806	$13,636.64
8. ILGWU Campaign Committee	C00004861	$12,000.00
9. ACTWU-COPE	C00005728	$ 8,500.00
10. Bricklayers and Allied Craftsmen	C00003632	$ 7,500.00
11. Machinists Non-Partisan Political League	C00002469	$ 7,400.00
12. United Steelworkers of America PAC	C00003590	$ 7,000.00 1/
13. Carpenters Legislative Improvement Committee	C00001016	$ 6,000.00
14. Engineers Political Education Committee	C00029504	$ 5,000.00
15. Ironworkers Political Action League	C00027359	$ 5,000.00
16. UFCW Active Ballot Club	C00002766	$ 5,000.00
17. ACTWU-COPE (Illinois)	C00026096	$ 4,000.00
18. Broward Federal Savings and Loan PAC	C00136945*	$ 3,900.00
19. IBEW Local Union 915 PAC	C00140749	$ 3,000.00
20. Independent Political Action Committee (of Broward County)	Not Registered	$ 2,500.00
21. Ironworkers Local 397	C00111922	$ 2,000.00
22. ElectroPAC 728 (IBEW)	C00113225	$ 1,700.00
23. South Florida Ironworkers 272 PAC	C00133330	$ 1,000.00
24. United Association 725 Pipefitters Air-Conditioning PAC	C00160507	$ 1,000.00
25. Local 349 ElectroPAC Fund (IBEW)	C00136689	$ 1,000.00
26. Plumbers Local Union 519	C00143362	$ 1,000.00
27. Bakery Confectionary Tobacco Workers PAC	C00127621	$ 1,000.00
28. Subway Surface Supervisors PAC	Not Registered	$ 500.00
29. Consolidated Local Union 177 Outside-Inside PAC	C00139683	$ 500.00
30. Woman Power Campaign	Not Registered	$ 500.00

1/ Includes $2,000 guaranteed outstanding contribution (pledge).

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NAME	I.D. NUMBER	NET CONTRIBUTIONS
31. Carpenters Local 845 PAC	C00152132	$ 500.00
32. Carpenters District Council of Madison County and Vicinity Illinois	Not Registered	$ 250.00
33. SEIU-Local 73	Not Registered	$ 250.00
34. Springfield Region L.P.L.	C00158071	$ 250.00
35. Machinists Credit Union	Not Registered	$ 150.00
36. Carpenters and Joiners Local 633 Trustees R and C Fund	Not Registered	$ 100.00
37. Carpenters Local Union No. 377	Not Registered	$ 100.00
38. Engineers Political Action Committee - IUOE	C00132258	$ 100.00
39. South Chicago Retired Steelworkers	Not Registered	$ 100.00
40. Political Education Legislative and Charity Fund Local 27	Not Registered	$ 100.00
41. Painters Local 41 Social Club	Not Registered	$ 100.00
42. United Labor Council Social Club	Not Registered	$ 100.00
43. Central Labor Council COPE	Not Registered	$ 100.00
44. Central Westmoreland County Labor Union Council AFL-CIO	Not Registered	$ 100.00
45. Local 1357 PAC (UPCW)	C00177113*	$ 100.00
46. Sheetmetal Workers Local 44 PAC	Not Registered	$ 59.00
47. United Brotherhood of Carpenters No. 1808	Not Registered	$ 50.00
48. Carpenters Local Union No. 295	Not Registered	$ 50.00
49. Carpenters District Council PAC	C00129940	$ 50.00
50. IUOE Local 17 Political Action Committee	C00104455	$ 50.00
51. Local 25 Political and Education Committee	C00137794	$ 50.00
52. UFCW Local 722 PAC	Not Registered	$ 50.00
53. Plumbers Local Union 27 Political Action Committee	Not Registered	$ 50.00
54. Pipefitters Local 524 PAC	C00131706	$ 40.00
55. Women of Political Action	C00179556*	$ 30.00
56. Will-Grundy Counties Central Trades and Labor Council	C00021907*	-0-
57. Friends of Peter Shapiro	C00167114*	$ 1,000.00
58. Campaign Fund for Pinellas for Progress	C00177105*	$ 300.00
59. Hoyer for Congress	C00140715	$ 5,000.00
60. Citizens for Singer	Not Registered	$ 1,400.00
61. Russo for Congress Committee	C00049635	$ 1,300.00
62. Citizens for Sarbanes	C00029777	$ 1,000.00
63. Mikulski for Congress	C00036095	$ 1,000.00
64. Fazio for Congress Committee	C00088773	$ 1,000.00
65. Committee to Re-Elect Senator Leichter	Not Registered	$ 1,000.00
66. Friends of Dick Gottfried	Not Registered	$ 1,000.00
67. Murtha for Re-Election Committee	C00019075	$ 1,000.00
68. 1984 Endorsed Democratic Candidates Committee	Not Registered	$ 850.00

	NAME	I.D. NUMBER	REP CONTRIBUTIONS
69.	I'm For Joe Committee	Not Registered	$ 750.00
70.	Citizens for Ronan	Not Registered	$ 500.00
71.	Citizens for Vrdolyak	Not Registered	$ 500.00
72.	Friends of Ruth Messinger	Not Registered	$ 500.00
73.	Friends of Oliver Koppell	Not Registered	$ 250.00
74.	Citizens for Lawrence Gulotta	Not Registered	$ 50.00
75.	Friends of Jim Keane	Not Registered	$ 50.00
76.	Musto Senate Committee	Not Registered	$ 20.00
77.	Citizens for David E. Jackson	Not Registered	$ 20.00
78.	William Morovitz Campaign Fund	Not Registered	-0-
79.	Citizens for John Cullerton	Not Registered	-0-
80.	Ansonia Independent Democrats	Not Registered	$ 1,500.00
81.	38th Ward Regular Democratic Organization	Not Registered	$ 500.00
82.	Perry County Democratic Party	Not Registered	$ 200.00
83.	Cheektowaga Democratic Town Committee	Not Registered	$ 100.00
84.	Ashcraft and Gerel	Not Registered	$ 550.00
85.	Koons, McKenney and Johnson	Not Registered	$ 300.00
86.	Miller and Leher	Not Registered	$ 500.00
87.	1901 LTD (A Partnership)	Not Registered	$ 500.00
88.	EMF and Associates	Not Registered	$ 100.00
89.	Excel Cleaners	Not Registered	$ 100.00
90.	Vandalia Bus Lines	Not Registered	$ 25.00
91.	Gene's Harvey Auto Repair	Not Registered	$ 200.00
92.	Don's Auto Body	Not Registered	$ 50.00
93.	Regal Drug Company, Inc.	Not Registered	$ 20.00
94.	Niemeyer Inc. DBA O'Brien's Pub	Not Registered	$ 20.00
95.	Multimedia Cablevision Inc. DBA Cablevision of Harvey	Not Registered	$ 20.00
96.	Babe's Club	Not Registered	$ 20.00
97.	TASH Inc.	Not Registered	$ 50.00
98.	GM Construction	Not Registered	$ 50.00
99.	Moskowitz and Moll	Not Registered	$ 250.00
100.	Sebald Dairy Farms	Not Registered	$ 50.00
101.	Name of Political Committee Not Disclosed		$ 5,000.00[2/]
102.	Name of Political Committee Not Disclosed		$ 2,000.00[3/]
103.	Name of Political Committee Not Disclosed		$ 2,000.00[4/]

*Non-Qualified

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2/ This contribution is noted on the Detailed Summary Page as being from a political committee; however, the itemization on Schedule A fails to disclose the name of the contributing committee.

3/ Ibid.

4/ This amount is disclosed on the Detailed Summary Page as being from political committees; however, a supporting Schedule A has not been provided.

CHART II

Potential Unregistered Delegate Committees From Selected PAC Reports

This is a listing of those delegate committees that have received PAC contributions and may be unregistered with the Commission.

This listing was compiled by initially reviewing the delegate committee reports to determine those PAC's that were making contributions to delegate committees. The PAC reports which covered the corresponding time frame of the reported contributions were reviewed. This list of the unregistered delegate committees was derived from this review.

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POTENTIAL UNREGISTERED DELEGATE COMMITTEES FROM SELECTED PAC REPORTS

	Number Contributions to	Total Amount
-NY - The Mondale Team (32nd C.D.) - (N. Tonowanda)	3	$ 4,715
-NY - 18th C.D. Delegate Committee for Mondale - (Bronx)	2	$ 400
-NY - 15th C.D. Delegates Coalition for Mondale - (NY, NY)	3	$ 2,460
-FL - C.D. 6 Delegates for Mondale - (Ocala)	1	$ 500
-FL - C.D. 11 Delegates for Mondale - (Rockledge)	1	$ 500
-MA - 6th District Delegate for Mondale - (Marble Head)	1	$ 500
-OH - Ohio Mondale at Large Delegates State Committee - (Marion)	1	$ 2,500
-PA - 15th C.D. Delegates for Mondale - (Allentown)	2	$ 1,500
-VA - Mondale 2nd C.D. Delegate Recruitment Committee - (Virginia Beach)	1	$ 5,000
-PR - Delegates Committee With Mondale - (San Juan, PR)	1	$ 5,000
-NY - West New York Elect Mondale Committee - 31st C.D. - (Williamsville)	1	$ 3,000
-MO - Western Missouri Mondale Delegate Committee - (St. Louis)	1	$ 2,500

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 25, 1984

Rosemary G. Kenyan, Esquire
Christian, Barton, Epps & Chappell
1200 Mutual Building
Richmond, VA 23219-3095

Re: MUR 1667
Mondale 3rd District Delegate
Section Committee

Dear Ms. Kenyan:

You have previously been notified that on April 6, 1984 the Federal Election Commission received a complaint which alleges that your client may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint and supplements received on April 18, April 27, and May 2, 1984, have previuously been forwarded to you. The Commission, on May 22, 1984, received an additional supplement to the complaint which is enclosed for your information.

Due to the fact that this additional material is not viewed as an amendment to the complaint, but rather as additional factual materials, receipt of this information will not extend the time period for you to respond to the original complaint and the supplement previously forwarded to you.

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

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

By: Lawrence M. Noble
Deputy General Counsel

Enclosure

8504050529

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 25, 1984

D. Patrick McKittrick, Esquire
McKittrick Law Firm
Strain Building
Suite 622
410 Central Avenue
P.O. Box 1184
Great Falls, Montana 59403

Re: MUR 1667
Montana At-Large Delegates for
Mondale

Dear Mr. McKittrick:

This responds to your letter dated May 15, 1984, wherein you requested an extension of time in which to submit a response to the complaint and its supplements in the above-captioned matter. The Commission has considered your request and on May 24, 1984, voted not to grant an extension.

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202)523-4143.

Sincerely,

Charles N. Steele (for)
Charles N. Steele
General Counsel

8504052660

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 25, 1984

Kathleen N. Sullivan, Esquire
Waldleigh, Starr, Peters, Dunn
and Chiesa
95 Market Street
Manchester, New Hampshire 03101

Re: MUR 1667
New Hampshire 1st District
Delegates for Mondale

Dear Ms. Sullivan:

This responds to your letter dated May 17, 1984, wherein you requested an extension of time in which to submit a response to the complaint and its supplements in the above-captioned matter. The Commission has considered your request and on May 24, 1984, voted not to grant an extension.

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202)523-4143.

Sincerely,

Charles N. Steele (Mims)
Charles N. Steele
General Counsel

8504030526 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 25, 1984

Rosemary G. Kenyon, Esquire
Christian, Barton, Epps, Brent
and Chappell
1200 Mutual Building
Richmond, Virginia 23219-3095

Re: MUR 1667
Mondale 3rd District Delegate
Selection Committee (VA)

Dear Ms. Kenyon:

This responds to your letter dated May 18, 1984, wherein you requested an extension of time in which to submit a response to the complaint and its supplements in the above-captioned matter. The Commission has considered your request and on May 24, 1984, voted not to grant an extension.

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202)523-4143.

Sincerely,

Charles N. Steele (sm)

Charles N. Steele
General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 25, 1984

James M. Beck, Esquire
Pepper, Hamilton and Scheetz
20th Floor
The Fidelity Building
123 South Broad Street
Philadelphia, Pennsylvania 19109-1083

Re: MUR 1667
4th District Delegates for
Mondale (PA)
19th Congressional District
Delegates for Mondale (PA)

Dear Mr. Beck:

This responds to your letter dated May 18, 1984, wherein you requested an extension of time in which to submit a response to the complaint and its supplements in the above-captioned matter. The Commission has considered your request and on May 24, 1984, voted not to grant an extension.

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202)523-4143.

Sincerely,

Charles N. Steele (amm)
Charles N. Steele
General Counsel

BEFORE THE FEDERAL ELECTION COMMISSION

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

CERTIFICATION

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

1. Failed in a vote of 2-4 to pass a motion to grant extensions of time in which to respond to the complaint and the supplements filed in MUR 1667 to the following committees:

   a) Mondale 3rd District Delegate Selection Committee (VA);

   b) Pennsylvania delegate committees;

   c) New Hampshire 1st District Delegates for Mondale;

   d) Montana At-Large Delegates for Mondale Committee.

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

(Continued)

8504052563

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 25, 1984

James M. Beck, Esquire
Pepper, Hamilton and Scheetz
20th Floor
The Fidelity Building
123 South Broad Street
Philadelphia, Pennsylvania 19109-1083

Re: MUR 1667
4th District Delegates for Mondale (PA)
19th Congressional District Delegates for Mondale (PA)

Dear Mr. Beck:

This responds to your letter dated May 18, 1984, wherein you requested an extension of time in which to submit a response to the complaint and its supplements in the above-captioned matter. The Commission has considered your request and on May 24, 1984, voted not to grant an extension.

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202)523-4143.

Sincerely,

Charles N. Steele (SMM)
Charles N. Steele
General Counsel

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2. Decided by a vote of 4-2 to deny the requests for an extension of time in which to respond to the complaint and the supplements filed in MUR 1667 to the following committees:

   a) Mondale 3rd District Delegate Selection Committee (VA);

   b) Pennsylvania delegate committees;

   c) New Hampshire 1st District Delegates for Mondale;

   d) Montana At-Large Delegates for Mondale Committee.

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

Attest:

5-24-84
Date

Marjorie W. Emmons
Secretary of the Commission

8504005265

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

84 MAY 23 P4: 00

May 23, 1984

SENSITIVE

MEMORANDUM TO: The Commission

FROM: Charles N. Steele
General Counsel

SUBJECT: Requests for Extension in MUR 1667

On May 21, 1984, the Office of the General Counsel received four requests from delegate committees for an extension of time in which to respond to the complaint and the supplements filed in MUR 1667. The basis for each request is summarized below:

1. Mondale 3rd District Delegate Selection Committee (VA): Due to the unavailability of committee officials during most of the response period, the committee's counsel requests an extension through June 15, 1984. (This would involve an extension of 15 days). The General Counsel recommends that the Commission grant an extension through June 11, 1984.

2. Pennsylvania delegate committees: The General Counsel's Office has been advised that the firm of Pepper, Hamilton & Sheez will be representing at least three delegate committees in Pennsylvania, including that state's At-Large Delegate Committee for Mondale. (Attachment 2) Due to counsel's efforts to prepare the responses of several committees, the General Counsel's Office believes his request for an extension through June 15, 1984, should be granted.

3. New Hampshire 1st District Delegates for Mondale: In a letter to the Commission (Attachment 3) counsel for this committee requests a 15 day extension through June 8, 1984, due to other pressing business and a personal family emergency. The General Counsel's Office believes the Commission should grant an extension through June 4, 1984.

4. Montana At-Large Delegates for Mondale Committee: The request from this committee is for an additional 15 days. (Attachment 4) (Although this Office does not yet know exactly when the materials were received by this respondent, it appears that they may have been received on or about May 7, 1984, allowing 3 days for delivery. Thus, the response would have

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been due on or about May 22, 1984.) Counsel requests an extension based upon work load considerations and the need to consult with his client. The General Counsel's Office believes an extension should be granted through June 1, 1984.

Recommendations

1. Grant an extension of time to the Mondale 3rd District Delegate Selection Committee (VA) through June 11, 1984.

2. Grant an extension of time to the Delegate Committees in the Fourth and Seventeenth Congressional Districts of Pennsylvania through June 15, 1984.

3. Grant an extension of time to the New Hampshire 1st District Delegates for Mondale through June 4, 1984.

4. Grant an extension of time to the Mondale At-Large Delegates for Mondale through June 4, 1984.

5. Approve and send the attached letters.

Attachments

1-4 Requests from the delegate committees
5-8 Proposed letters to the delegate committees

8504052567

RECEIVED
FEC
84 MAY 21 P1:47

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

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

Attachment 1

8504052603

Gen'l 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

20TH FLOOR
THE FIDELITY BUILDING
123 SOUTH BROAD STREET
PHILADELPHIA, PENNSYLVANIA 19109-1099
215-893-3000
CABLE ADDRESS "PEPHIL PHILADELPHIA"
TELECOPIER (#488) 215-732-6080 · (#2800) 215-893-8804
DEX (#2800) 215-546-3477 · TWX 710-670-0777

600 SOUTH OLIVE STREET
LOS ANGELES, CA 90014
213-617-6151

512 HAMILTON STREET
ALLENTOWN, PA 18101
215-434-8104

515 CORPORATE PARK DRIVE
WHITE PLAINS, NY 10604
914-694-4600

WRITER'S DIRECT DIAL NUMBER

(215) 893-3995

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.

Attachment 2
P.1

8504052262

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

8504050527 0

Attachment 2
p2

RECEIVED 3327
FEC FED
84 MAY 21 P12:29

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 N. 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 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

Attachments

8504052711

RECEIVED BY THE FEC
84 MAY 21 A10:12

CHRISTIAN, BARTON, EPPS, BRENT & CHAPPELL
1200 MUTUAL BUILDING
RICHMOND, VIRGINIA 23219-3095

TEL. 804-644-7851
CABLE ADDRESS "BARPAR"

MUR 1667
Memo

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 G. Kenyon

RGK:vnj

Attachment 4

8504052702

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Rosemary G. Kenyon, Esquire
Christian, Barton, Epps, Brent
and Chappell
1200 Mutual Building
Richmond, Virginia 23219-3095

Re: MUR 1667

Dear Ms. Kenyon:

This letter responds to your request for an extension of time to respond to the complaint and its supplements in the above-captioned matter. The Commission considered your request and, on May , 1984, voted to grant you an extension through , 1984.

Should you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202)523-4143.

Sincerely,

Charles N. Steele
General Counsel

Attachments

8504050527 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

James M. Beck, Esquire
Pepper, Hamilton & Scheetz
20th Floor
The Fidelity Building
123 South Broad Street
Philadelphia, Pennsylvania 19109-1083

Re: MUR 1667

Dear Mr. Beck:

This letter responds to your request for an extension of time to respond to the complaint and its supplements in the above-captioned matter. The Commission considered your request and, on May , 1984, voted to grant you an extension through , 1984.

Should you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202)523-4143.

Sincerely,

Charles N. Steele
General Counsel

8504050271

Attachment 6

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Kathleen N. Sullivan, Esquire
Wadleigh, Starr, Peters, Dunn
and Chiesa
95 Market Street
Manchester, New Hampshire 03101

Re: MUR 1667

Dear Ms. Sullivan:

This letter responds to your request for an extension of time to respond to the complaint and its supplements in the above-captioned matter. The Commission considered your request and, on May , 1984, voted to grant you an extension through , 1984.

Should you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202)523-4143.

Sincerely,

Charles N. Steele
General Counsel

8504050527

Attachment 7

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

D. Patrick McKittrick, Esquire
McKittrick Law Firm
Strain Building
Suite 622
410 Central Avenue
P.O. Box 1184
Great Falls, Montana 59403

Re: MUR 1667

Dear Mr. McKittrick:

This letter responds to your request for an extension of time to respond to the complaint and its supplements in the above-captioned matter. The Commission considered your request and, on May , 1984, voted to grant you an extension through , 1984.

Should you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202)523-4143.

Sincerely,

Charles N. Steele
General Counsel

8504052705

Attachment 8

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 24, 1984

David M. Ifshin, Esquire
Carolyn U. Oliphant, Esquire
Mondale for President Committee, Inc.
2201 Wisconsin Avenue
Suite 100
Washington, D.C. 20007

MUR 1667

Dear Mr. Ifshin and Ms. Oliphant:

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. On April 18, April 27, and May 2, 1984, the Commission received supplemental submissions from the complainant. Copies of those submissions have been forwarded to you. After reviewing the supplemental submissions, the Commission concluded that they were not amendments to the complaint, but rather constituted the submission of additional factual and legal materials. You have been notified of the Commission's decision regarding the treatment of the additional submissions.

On May 22, 1984, the Commission received additional information from the complainant concerning the allegations raised in the initial complaint and the supplements, a copy of which is enclosed.

A copy of this additional material has been forwarded to the Commission for a determination whether it should be treated as a supplement or as an amendment to the complaint. Should the Commission determine that it is an amendment, you will be afforded a specific period in which to respond to this material. You will be notified of the Commission's determination within five days. If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202)523-4143.

Sincerely,

Charles N. Steele
General Counsel

8504052077

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 24, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

David M. Ifshin, Esquire
Carolyn U. Oliphant, Esquire
Mondale for President Committee, Inc.
Suite 100
2201 Wisconsin Avenue, N.W.
Washington, D.C. 20007

Re: MUR 1667
Mondale for President
Committee, Inc.
Michael S. Berman, as treasurer

Dear Mr. Ifshin and Ms. Oliphant:

On May 10, 1984, you received notification that the Commission found reason to believe that the Mondale for President Committee, Inc., and Michael S. Berman, as treasurer, had violated 2 U.S.C. §§ 441a(b)(1)(A) and 441a(f), provisions of the Federal Election Campaign Act of 1971, as amended. An investigation of this matter is being conducted and it has been determined that additional information from your clients is necessary.

Consequently, the Federal Election Commission has issued the attached subpoena and order which requires your clients to provide information which will assist the Commission in carrying out its statutory duty of supervising compliance with the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26, U.S. Code.

If you have any questions, please direct them to Stephen Mims, the attorney handling this matter, at (202)523-4143.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Subpoena and Order

8504052793

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Mondale for President Committee, Inc.	)	MUR 1667
Michael S. Berman, as treasurer	)	

SUBPOENA TO PRODUCE DOCUMENTS AND
ORDER TO SUBMIT WRITTEN ANSWERS

TO: Mondale for President Committee, Inc.
Michael S. Berman, as treasurer
c/o David Ifshin, Esquire
Carolyn U. Oliphant, Esquire
2201 Wisconsin Avenue
Washington, DC

Pursuant to 2 U.S.C. § 437d(a)(1) and (3) and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the interrogatories attached to this Order and subpoenas you to produce the requested documents.

Such answers must be submitted under oath and should be made by the individual or individuals having knowledge of the subject matter of the questions, and the documents should be compiled and delivered by the individual or individuals having knowledge of, and where possible, supervisory responsibility for the required documents. Such answers and documents must be forwarded to the Commission within fifteen (15) days of your receipt of this Order and Subpoena.

8504052727

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set her hand on May 23, 1984.

Lee Ann Elliott
Chairman

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

Attachment

3504055233

Subpoena and Order to: Mondale for President Committee, Inc.
Michael S. Berman, as treasurer

On May 8, 1984, the Commission determined there was reason to believe the Mondale for President Committee, Inc., ("MPC") and Michael S. Berman, as its treasurer, violated 2 U.S.C. §§ 441a(b)(1)(A) and 441a(f). Specifically, the Commission determined that there was reason to believe MPC and Michael S. Berman, as its treasurer, accepted excessive contributions and made expenditures in excess of the limitations due to its affiliation with the Mondale delegate committees. As part of its investigation into this matter, therefore, the Commission requests the documents and materials described herein.

Definitions and Requests

As used in this subpoena and order, the terms listed below are defined as follows:

1. The term "documents and materials" shall mean all tangible things by which human communication is transmitted or stored including the original, all copies, and drafts of writings of any kind, printed, visual, or electronic materials to be produced with respect to each of the requests enumerated herein. In particular, without limiting the generality of the foregoing, "documents and materials" include correspondence, memoranda, reports, minutes, pamphlets, notes, letters, discs, cassettes, telegrams, messages (including reports, notes, and memoranda of telephone conversations and conferences), calendar and diary entries, contracts, data, agendas, articles, visual aides, account statements, billing forms, receipts, checks, solicitation materials, records and compilations. Designated "documents and materials" are to be taken as including all attachments, enclosures and other documents that are attached to, relate to, or refer to such designated "documents and materials."

2. The terms "and" and "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of this request any answers or documents which may be otherwise construed to be out of its scope.

3. "Identify" with respect to individuals shall mean the full name, last known residence address of such individual, the last known place of business where such individual is or was employed, and the title of the job, office or position held with the Mondale for President Committee, Inc.

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4. All references to the Mondale for President Committee, Inc., with respect to each of the requests and answers enumerated herein, include all persons, political committees, and other entities authorized to conduct business on behalf of the Mondale for President Committee, Inc.

5. All references to "any delegate committees," with respect to each of the requests and answers enumerated herein, include each individual delegate committee and all delegate committees supporting Walter F. Mondale, known to Mondale for President, Inc.

6. All requests contained herein are for information, documents and materials in your possession from the date of organization of the Mondale for President Committee, Inc. up to and including May 22, 1984.

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Request for Documents and Materials

The Commission requests that you produce the following documents and materials:

1. Copies of all documents and materials which relate, refer or pertain to the formation of any delegate committees.

2. Copies of all documents and materials prepared by MPC for use by any person and delegate(s) in organizing, creating or forming any delegate committees.

3. Copies of all documents and materials which relate, refer or pertain to the role MPC staff have/had in the organization, formation, creation or operation of any delegate committees.

4. Copies of all documents and materials which relate, refer or pertain to financial, strategic, organizational and other assistance provided to any delegate committees by MPC.

5. Copies of all documents and materials which relate, refer or pertain to MPC's role in the direct or indirect provision of financial assistance to any delegate committees.

6. Copies of all documents and materials which relate, refer or pertain to communications between MPC and any other entity or organization, including political committees and labor organizations, which concern contributions or potential contributions to any delegate committees by each such entity or organization.

7. Copies of all documents and materials which relate, refer or pertain to communications between MPC and any delegate committees concerning contributions or potential contributions to any delegate committees from any other entity or organization.

8. Copies of all documents and materials which relate, refer or pertain to all direct or indirect authorization, permission, direction or assistance in the use of MPC's contributor lists or files by any delegate committees.

9. Copies of all documents and materials which relate, refer or pertain to solicitations for contributions to any delegate committees.

10. Copies of all documents and materials which relate, refer or pertain to solicitations for contributions to MPC made by any delegate committees.

11. Copies of all documents and materials which relate, refer or pertain to the staffing of any delegate committees.

12. Copies of all documents and materials which relate, refer or pertain to efforts by MPC to organize the use of campaign workers among and between any delegate committees.

13. Copies of all documents and materials which relate, refer or pertain to disbursements made by any delegate committees.

14. Copies of all documents and materials which relate, refer or pertain to the use or potential use of funds remaining in any delegate committee accounts following the primary election in their respective states.

15. Copies of all documents and materials directed to any delegate committees which relate, refer or pertain to requests by MPC for copies of delegate committee filings with the Federal Election Commission.

16. Copies of all documents and materials which relate , refer or pertain to campaign materials prepared by or for use of any delegate committees.

17. Copies of machine readable materials such as tapes, disks, punch cards, diskettes and, cassettes used for the storage of electronic data that relate, refer or pertain to the identification of vendors used by MPC and payments made to such vendors, together with any and all necessary supporting documentation that identifies the electronically stored material.

18. Copies of machine readable materials such as tapes, disks, punch cards, diskettes and, cassettes used for the storage of electronic data that relate, refer or pertain to the identification of individual(s) who received payment(s) by MPC for salary, subsistence, per diem or reimbursement, together with any and all necessary supporting documentation that identifies the electronically stored material.

INTERROGATORIES

In addition to the materials requested above, the Commission requests that you provide answers to the following interrogatories:

1) State whether MPC provided delegate(s) or other person(s) with:

a) organizational assistance in forming delegate committees,
b) strategic assistance in forming delegate committees;
c) direct or indirect financial assistance in forming delegate committees; or
d) other assistance in forming delegate committees.

2) If the answer to any part of No. 1 above is yes:

a) Identify each delegate or other person who received assistance;
b) Identify each MPC representative who provided such assistance; and
c) Describe in complete detail the assistance provided.

3) State whether MPC contacted delegate(s) or other person(s) and suggested that they form delegate committees.

If the answer is yes:

a) Describe in complete detail each such contact, including the nature and extent of the contact;
b) Identify each delegate or other person contacted; and
c) Identify each MPC representative who made the suggestion.

4) State whether delegate(s) or other person(s) contacted MPC seeking assistance in the formation or operation of delegate committees.

If the answer is yes:

a) Describe in complete detail each such contact, including the nature of the contact;

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b) Identify each delegate or other person who contacted MPC for such assistance;
c) Identify each MPC representative who was contacted; and
d) Describe in detail all assistance provided by MPC as a result of each such contact.

5) State whether MPC provided any delegate committee with:

a) Organizational assistance;
b) Strategic assistance;
c) Direct or indirect financial assistance;
d) Assistance in the preparation of campaign materials; or
e) Other assistance.

6) If the answer to any part of No. 5, above, is yes:

a) Identify each delegate committee that received assistance;
b) Identify each MPC representative who provided such assistance; and
c) Describe in complete detail the assistance provided.

7) State whether MPC solicited contributions on behalf of any delegate committees.

If the answer is yes:

a) Describe the manner in which the solicitations were made;
b) Identify each entity and person to whom a solicitation was made, including the date they were solicited;
c) Identify each MPC representative who authorized such solicitations;
d) List all criteria used by MPC to determine which deleage committees would benefit from the solicitation effort; and

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e) Identify each delegate committee which received funds as a result of an MPC solicitation.

8) State whether MPC suggested, or advised contributors or potential contributors of the identity of the delegate committees to whom their contributions should be forwarded.

If the answer is yes, for each occasion upon which MPC made such suggestion(s) or provided such advice:

a) Identify each contributor or potential contributor who received such suggestion or advice;
b) Identify each MPC representative who provided such suggestion or advice;
c) Describe the manner in which such suggestion or advice were provided;
d) State the date upon which such suggestion or advice was provided; and
e) Identify the delegate committee(s) that were suggested to the contributor or potential contributor.

9) State whether MPC suggested, or advised contributors or potential contributors of the amounts to be contributed to any delegate committees.

If the answer is yes, for each occasion upon which MPC made such suggestions or provided such advice:

a) Identify each contributor or potential contributor who received such suggestion or advice;
b) Describe the manner in which such suggestion or advice was provided;
c) Identify each MPC representative who provided such suggestion or advice; and
d) State the date upon which such suggestion or advice was provided.

10) State whether MPC assisted any delegate committees in obtaining paid staff and volunteers.

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If the answer is yes, for each occasion upon which such assistance was provided:

a) Identify the delegate committee receiving such assistance;
b) Identify the MPC representative providing such assistance;
c) Describe in complete detail the nature and extent of such assistance; and
d) State whether the delegate committee involved sought such assistance from MPC on its own initiative.

11) State whether MPC suggested or recommended that any person(s) who had ever provided services for MPC (excluding vendors) contact any of the delegate committees for the purpose of performing services for such committees.

If the answer is yes, for each occasion upon which such suggestion or recommendation was made:

a) Identify the person to whom the suggestion or recommendation was made;
b) Describe the position(s) held by such person while providing services for MPC;
c) Identify the MPC representative(s) who made such suggestion or recommendation; and
d) State the date upon which such suggestion or recommendation was made.

12) State whether any person(s) who performed services for MPC (excluding vendors) also performed services for any delegate committees.

If the answer is yes:

a) Identify each such person;
b) Identify each delegate committee such person performance services for;
c) Describe the services performed by each such person for MPC; and

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d) Describe the services performed by each such person for each delegate committee.

13) State whether MPC suggested to any delegate committees that they use a specific vendor.

If the answer is yes:

a) Identify each such vendor;
b) Identify each delegate committee to whom the suggestion was made;
c) State the date upon which each suggestion was made;
d) Identify the MPC representative who made the suggestion;
e) State whether the suggestion was made at the request of the delegate committee; and
f) State whether the vendor had previously provided or subsequently provided services to MPC.

14) State whether MPC directly or indirectly authorized, permitted or directed any delegate committees to use MPC's contributor lists or files.

If the answer is yes:

a) List the date upon which each authorization, permission or direction was given;
b) Identify the MPC representative who gave such authorization, permission or direction; and
c) Identify each delegate committee that was given such authorization, permission or direction.
d) Describe each such instance in detail.

15) State whether MPC suggested, recommended, or directed that funds remaining in the accounts of any delegate committees after the primary election in their respective states be used in a specific manner.

If the answer is yes:

a) Describe the nature and extent of each such suggestion or recommendation;

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c) Identify the delegate committee to whom each such suggestion or recommendation was made; and
d) State the date upon which each such suggestion or recommendation was made.

16) State whether MPC requested or suggested to any delegate committees that they submit their campaign materials to MPC prior to distribution.

If the answer is yes, for each occasion upon which MPC made such a request or suggestion:

a) Identify each delegate committee to which such request or suggestion was made;
b) Identify each MPC representative who made such request or suggestion;
c) State the date upon which such request or suggestion was made; and
d) Describe the nature of the request or suggestion.

17) State whether MPC provided any delegate committees with campaign materials or suggestions for campaign materials.

If the answer is yes, for each occasion upon which campaign materials or suggestions for campaign materials were provided:

a) Identify each delegate committee that was provided with such materials or suggestions.
b) Identify the MPC representative who provided such materials or suggestions.
c) State the date upon which such materials or suggestions were provided.
d) Describe the nature of the suggestion made or the materials provided.

18) State whether MPC reviewed campaign materials prepared by any delegate committees prior to their distribution.

If the answer is yes, for each occasion upon which MPC reviewed such materials:

a) Identify each delegate committee who's materials were reviewed;
b) Describe how MPC came into possession of such materials;
c) State whether MPC provided comments concerning the form or content of the materials; and
d) Describe the method(s) by which such comments were made.

8504050282

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES N. STEELE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/SUSAN M. TEIR SMTT

DATE: MAY 23, 1984

SUBJECT: MUR 1667 - Subpoena and Order

The attached subpoena and order, which was Commission approved in Executive Session on May 22, 1984, has been signed and sealed this date.

Attachment

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Mondale for President Committee, Inc.	)	MUR 1667
Michael S. Berman, as treasurer	)	

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of May 22, 1984, do hereby certify that the Commission decided by a vote of 5-0 to take the following actions in MUR 1667:

1. Approve the subpoena and order to the Mondale for President Committee, Inc., and Michael S. Berman, as treasurer, as recommended in the General Counsel's report dated May 21, 1984, and amended in the meeting.

2. Approve and send the letter attached to the General Counsel's report dated May 21, 1984.

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

Attest:

5-22-84
Date

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

8504050291

SENSITIVE

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

84 MAY 21 P2: 26

May 21, 1984

Circulated Late

EXECUTIVE SESSION

MAY 22 1984

MEMORANDUM TO: The Commission

FROM: Charles N. Steele
General Counsel

SUBJECT: Subpoena and Order in MUR 1667

The Office of the General Counsel has prepared for Commission approval a subpoena and order directed to the Mondale for President Committee, Inc., and Michael S. Berman, as treasurer of the committee. The subpoena requests documents and answers to interrogatories.

Recommendations

1. Approve the attached subpoena and order to the Mondale for President Committee, Inc., and Michael S. Berman, as treasurer.

2. Approve and send the attached letter.

Attachments

1. Proposed Subpoena and Order to the Mondale for President Committee, Inc., and Michael S. Berman, as treasurer.

2. Proposed letter to the Mondale for President Committee, Inc., and Michael S. Berman, as treasurer.

8 5 0 4 0 0 5 2 9 9

Mondale for President
2000 Wisconsin Avenue, N.W.
Washington, D.C. 20007
Telephone: 202-625-1984

MONDALE

'84 MAY 22 P3:27

GCC 3269

May 22, 1984

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

mms

RE: MUR 1667

Dear Mr. Steele:

As we informed you on April 30, 1984, Mr. Mondale has instructed us to take the position for purposes of resolving this matter that the Committee would voluntarily treat Mondale delegate committees as though they were affiliated with Mondale for President Committee, Inc. As you are probably also aware, Mr. Mondale has made a commitment to refund all contributions given to delegate committees by political action committees. We had anticipated that the refund of these contributions would be one of the matters discussed in conciliation. Since the Commission rejected our request for informal conciliation at this time, it appears that these refunds cannot be part of the conciliation process if they are to be handled immediately.

Although conciliation will not begin now, Mr. Mondale still wants to fulfill his commitment to refund the PAC contributions as soon as possible. To this end, the Committee has placed $400,000 in an escrow account. We are in the process of determining from reports on file at the FEC the precise amount of PAC contributions. These amounts will be verified with the respective unions. Once this has been accomplished, we would like to refund the full amounts directly to the union PACs. This would be the least complicated means of accomplishing this goal. The Committee, of course, will report these disbursements and we will notify each delegate committee of the amount refunded so that their reports can be amended accordingly.

We hope that the Commission will have no objection to this plan. While the refunds would be premised on Mr. Mondale's voluntary decision to treat these committees as though affiliated, we do not believe the Committee should proceed if the Commission will treat this action as evidence of affiliation or find that it violates any other provision of the FECA.

In order to expedite this process, please advise us as soon

Paid for by Mondale for President, Inc.

8 3 0 4 0 5 0 5 2 9 3

as possible if the Commission has any objection to the actions outlined in this letter.

Sincerely,

David M. Ifshin
General Counsel

Lyn Oliphant

Carolyn U. Oliphant
Deputy General Counsel

8504050529 4

8504052925

MONDALE

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

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 21, 1984

Michael D. Sher, Esquire
Friedman & Koven
208 South LaSalle Street
Chicago, IL 60604

Re: MUR 1667
Fourth District Mondale Delegate
Committee (IL)

Dear Mr. Sher:

This responds to your May 15, 1984, request for an extension of time in which to respond to the complaint in the above-captioned matter. The Commission considered your request and voted not to grant the extension. Your response is, therefore, due to the Commission no later than May 22, 1984.

Should you have any questions regarding this matter, please contact Stephen Mims, the attorney assigned to this matter at (202)523-4143.

Sincerely,

Charles N. Steele
General Counsel

8504050296

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
	)	MUR 1667
Fourth District Mondale Delegate Committee (IL)	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on May 18, 1984, the Commission decided by a vote of 6-0 to take the following actions in MUR 1667:

1. Deny the request for an extension of time in which to respond to the complaint and supplements for the Fourth District Mondale Delegate Committee (IL).

2. Approve and send the letter as attached to the General Counsel's May 17, 1984 Memorandum to the Commission.

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

Attest:

5-18-84
Date

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

Received in Office of Commission Secretary: 5-17-84, 9:58
Circulated on 48 hour tally basis: 5-17-84, 11:00

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SENSITIVE

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

84 MAY 17 A 9: 58

May 17, 1984

MEMORANDUM TO: The Commission

FROM: Charles N. Steele
General Counsel

SUBJECT: Request for Extension of Time in Which To Respond to the Complaint in MUR 1667

On May 16, 1984, the General Counsel's Office received a request for a 15 day extension of time in which to respond to the complaint and supplements in MUR 1667 from counsel for the Fourth District Mondale Delegate Committee ("Committee").

Counsel cites as the basis for the request the voluminous nature of the materials submitted in the matter, and the fact that he was only recently retained. (The Committee received the materials on May 7, 1984 and the designation of counsel form is dated May 8, 1984).

In view of the absence of any unique circumstances, the Office of the General Counsel recommends the request for extension of time be denied.

Recommendations

1. Deny the request for an extension of time in which to respond to the complaint and supplements for the Fourth District Mondale Delegate Committee (IL).

2. Approve and send the attached letter.

Attachments
1. Request from the Fourth District Mondale Delegate Committee (IL).

2. Proposed letter.

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RECEIVED
FEC
Cat. 3171
84 MAY 16 P1:08

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) 269-6066

May 15, 1985

MUR 1667
mmp

84 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

Attachment 1
Page 1

8504005297

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1667

NAME OF COUNSEL: MICHAEL D. SHER

ADDRESS: FRIEDMAN & KOVEN
Room 960
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

Kerri L. Harris, Treasurer
Signature

RESPONDENT'S NAME: FOURTH DISTRICT MONDALE DELEGATE Committee

ADDRESS: 210 TIMBER PL.
NEW LENOX, IL.
60451

HOME PHONE: (815) 485-4017

BUSINESS PHONE:

8504053007

Attachment 1
Page 2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Michael D. Sher, Esquire
Friedman & Koven
208 South LaSalle Street
Chicago, IL 60604

Re: MUR 1667
Fourth District Mondale Delegate
Committee (IL)

Dear Mr. Sher:

This responds to your May 15, 1984, request for an extension of time in which to respond to the complaint in the above-captioned matter. The Commission considered your request and voted not to grant the extension. Your response is, therefore, due to the Commission no later than May 22, 1984.

Should you have any questions regarding this matter, please contact Stephen Mims, the attorney assigned to this matter at (202)523-4143.

Sincerely,

Charles N. Steele
General Counsel

8504053301

Attachment 2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 18, 1984

David M. Ifshin, Esquire
Carolyn U. Oliphant, Esquire
Mondale for President Committee, Inc.
2001 Wisconsin Avenue, N.W.
Suite 100
Washington, D.C. 20007

Re: MUR 1667

Dear Mr. Ifshin and Ms. Oliphant:

The purpose of this letter is to advise you that the Commission, on May 15, 1984, voted to send a notice to each of the delegate committees advising them that the Commission cannot, at this time, approve any requests for termination. A copy of the sample letter is enclosed together with a list of the committees to which the notices were sent on May 16, 1984.

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202)523-4143.

Sincerely,

Charles N. Steele
General Counsel

By: Lawrence M. Noble
Deputy General Counsel

Enclosure

8504055302

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 16, 1984

TREASURER
COMMITTEE
STREET
CITY, STATE ZIP

Identification Number:

Dear TREASURER:

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
Assistant Staff Director
Reports Analysis Division

8504053

Terrie L. Hanus, Treasurer
Fourth District Mondale
Delegate Committee
1210 Timber Place, Apt. 1B
New Lenox, IL 60451

Identification Number: C00175596

George E. Comerford, Treasurer
14th C D for Mondale
5844 Western Way
Lake Worth, FL 33463

Identification Number: C00175810

Jean M. Foran, Treasurer
Eleventh District Mondale
Delegate Committee
6156 North Knox
Chicago, IL 60646

Identification Number: C00175828

Elliott D. Hartstein, Treasurer
10th District Mondale Delegate
Committee
908 Providence Lane
Buffalo Grove, IL 60090

Identification Number: C00175836

George A. Moser, Treasurer
12th District Mondale
Delegate Committee
2200 West Higgins Road
Hoffman Estates, IL 60195

Identification Number: C00175943

Angelique O. Stahl, Treasurer
Mondale 16th District Delegate
Committee
11621 N.W. 23rd Street
Pembroke Pines, FL 33026

Identification Number: C00175950

Gregory A. Kinczewski, Treasurer
Ninth District Mondale Delegate
Committee
1226 North Greenleaf
Evanston, IL 60202

Identification Number: C00176180

8504055301

James K. Polk, Treasurer
Mondale Delegates for the
Illinois 18th Committee
901 West Brons
Peoria, IL 61604

Identification Number: C00176198

Robert D. Parks, Treasurer
Mondale 15th District
Delegate Committee
440 South Andrew Avenue
Ft. Lauderdale, FL 33301

Identification Number: C00176644

Robert A. Sugarman, Treasurer
South Florida Delegates for
Mondale
P.O. Drawer 520337
1951 Northwest 17th Avenue
Miami, FL 33152

Identification Number: C00176875

Elizabeth Bolden, Treasurer
Mondale 17th C D Delegate Committee
48A Hampton Place
Brooklyn, NY 11213

Identification Number: C00176883

Anthony Redington, Treasurer
New Hampshire 2nd District
Delegates for Mondale
4 Neil Drive
Allenstown, NH 03275

Identification Number: C00176891

Nancy Ryan, Treasurer
New Hampshire 1st District
Delegates for Mondale
5 Haines
Merrimack, NH 03054

Identification Number: C00176909

Joan P. Murphy, Treasurer
13th Congressional District
Delegate Committee for
Walter F. Mondale
11601 South Pulaski
Alsip, IL 60658

Identification Number: C00176917

Donna M. McWilliams, Treasurer
17th District Mondale Delegate
Committee
400 Rock Island Bank Bldg.
P.O. Box 428
Rock Island, IL 61201

Identification Number: C00176925

Betty Donovan, Treasurer
Delegates for Mondale Committee
-21st Congressional District
8A Potomac Drive
Fairview Heights, IL 62208

Identification Number: C00176933

Roman Lobodzinski, Treasurer
Eighth District Mondale
Delegate Committee
3055 North Milwaukee
Chicago, IL 60618

Identification Number: C00176941

Jack L. Bright, Treasurer
Sixth District Mondale
Delegate Committee
478 Washington Street
Elmhurst, IL 60126

Identification Number: C00177139

Herman L. Dammerman, Treasurer
15th District Delegates for Mondale
1407 Hanson Drive
Normal, IL 61761

Identification Number: C00177238

8504053

Salvatore Mancini, Treasurer
1st District Delegate Committee
for Mondale
1910 Smith Street, Suite 9
North Providence, RI 02911

Identification Number: C00177246

J. Gordon Pennington, Treasurer
CD #1 Delegates for Mondale
7830 North Palafox Street
Pensacola, FL 35214

Identification Number: C00177360

Ann M. Yarborough, Treasurer
Arlington Mondale Delegate
Committee
5140 North 37th Street
Arlington, VA 22207

Identification Number: C00177543

Joseph Delorenzo, Treasurer
2nd District Delegate Committee
for Mondale
1910 Smith Street, Suite 9
North Providence, RI 02911

Identification Number: C00177808

Patrick C. Brumleve, Treasurer
22nd Congressional District
Delegates for Mondale
P.O. Box 111
Cobden, IL 62920

Identification Number: C00177840

Jerome C. Shapiro, Treasurer
14th District Delegate
Committee for Mondale
7 Pheasant Run
DeKalb, IL 60115

Identification Number: C00177857

8504053 07

Calvin D. Devoney, Treasurer
Congressional District 4
Delegates for Mondale
P.O. Box 668
3141 Howland Blvd.
Orange City, FL 32763

Identification Number: C00177865

Jo Anna Conte, Treasurer
CD 2 Delegates for Mondale,
Florida
P.O. Box 10403
Tallahassee, FL 32302

Identification Number: C00177873

Bill Dempsey, Treasurer
20th C D Delegates for Mondale
P.O. Box 23
Forsyth, IL 62535

Identification Number: C00177881

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422 Douglass Street
Reading, PA 19601

Identification Number: C00178137

Sue Moore, Treasurer
Mondale Delegates Congressional
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94 Baywood Avenue
Clearwater, FL 33575

Identification Number: C00178145

Georgia E. Trevan, Treasurer
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Delegates for Walter Mondale
9401 South Michigan Avenue
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Identification Number: C00178236

8504053068

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Delegates for Mondale
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11151 South King Drive
Chicago, IL 60628

Identification Number: C00178251

Anthony McNeil, Treasurer
Second Congressional District
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632 May Place
Philadelphia, PA 19139

Identification Number: C00178319

Nancy Miller, Treasurer
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2129 Southeast Holland Street
Port St. Lucie, FL 33452

Identification Number: C00178327

Mae McHugh, Treasurer
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for Mondale
11 Bryden Street
Pittston, PA 18640

Identification Number: C00178467

Lavaunne Miller, Treasurer
Congressional District 9
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24 Meadow Lark Lane
Land O' Lakes, FL 33539

Identification Number: C00178475

8040530

Samuel C. Catherwood, Treasurer
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P.O. Box 8796
1100 Cesery Blvd.
Jacksonville, FL 32211

Identification Number: C00178509

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2431 East Harrison
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Frank G. Mabrey, Treasurer
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1130 North Main
Rockford, IL 61103

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Oak Lawn, IL 60453

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Orlando, FL 32804

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8504055310

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East Lansing, MI 48823

Identification Number: C00179697

Elizabeth McCurdy, Treasurer
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P.O. Box 136
Beaver Falls, PA 15010

Identification Number: C00179846

8504053 1

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Identification Number: C00179853

Charlotte K. Scheman, Treasurer
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Briarwood, NY 11435

Identification Number: C00179861

Elizabeth Tarpey, Treasurer
Sharpe/Jackson Delegates
for Mondale
92 Hillcrest Road
Mt. Vernon, NY 10552

Identification Number: C00179879

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Rockaway Beach, NY 11693

Identification Number: C00179887

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Identification Number: C00179895

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10th Congressional District
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Identification Number: C00180141

Philip B. Ebersole, Treasurer
Delegate Committee for Mondale
16th Congressional District
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Lancaster, PA 17602

Identification Number: C00180158

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22nd Congressional District
Delegate Committee for Mondale
335 North Main Street
Washington, PA 15301

Identification Number: C00180166

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Altoona, PA 16601

Identification Number: C00180174

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Identification Number: C00180182

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For Mondale
P.O. Box 127
Lake Clear, NY 12945

Identification Number: C00180190

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Committee for Western New York
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Rochester, NY 14614

Identification Number: C00180208

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- Delegate Slate
Box 124
Clifton Park, NY 12065

Identification Number: C00180216

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64-48 223rd Place
Bayside, NY 11364

Identification Number: C00180224

Ronald V. Iaboni, Treasurer
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for Mondale
1 Fisher Drive
Mt. Vernon, NY 10552

Identification Number: C00180232

Patricia Tallmadge, Treasurer
15th District Delegates
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34451 Harroun
Wayne, MI 48184

Identification Number: C00180380

Nancy B. Baulis, Treasurer
7th Congressional District
Mondale Delegates
90 Barbara Road
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Identification Number: C00180398

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For Mondale
198 Thomas Johnson Drive #10
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Identification Number: C00180406

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Identification Number: C00180414

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Identification Number: C00180547

Louann Shrader, Treasurer
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Identification Number: C00180554

Richard Brabender, Treasurer
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Delegates for Mondale
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Identification Number: C00180562

Kevin Thompson, Treasurer
22nd Congressional District
Delegates for Mondale
130 North Main Street
New City, NY 10956

Identification Number: C00180570

Ruben S. Gersowitz, Treasurer
23rd Congressional Democratic
Committee Delegates for Walter
F. Mondale
11 North Pearl Street, RM 1608
Albany, NY 12207

Identification Number: C00180588

Joanne B. Ciulla, Treasurer
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Philadelphia, PA 19103

Identification Number: C00180679

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Wisconsin At-Large Delegate
Mondale Committee
126 Sunny Meade Lane No. 6
Madison, WI 53713

Identification Number: C00180687

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Mondale Delegate Election Committee
- 6th C D
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San Rafael, CA 94901

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for Mondale
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Denton, MD 21629

Identification Number: C00180703

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Mondale 13th Delegate Committee
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Philadelphia, PA 19102

Identification Number: C00180711

Art Rooney, II, Treasurer
Pennsylvania 18th Congressional
District Delegates for Mondale
1 Oxford Center, 40th Floor
Pittsburgh, PA 15219

Identification Number: C00180729

Kathleen Smith, Treasurer
Mondale Delegates - 20th District
1032 South Braddock Avenue
Pittsburgh, PA 15218

Identification Number: C00180737

Joan Sanders Rudolph, Treasurer
Second District Delegates for Mondale
7119 Heathfield Road
Baltimore, MD 21212

Identification Number: C00180984

Otto Unsinn, Treasurer
Montgomery County for Mondale
Delegate Committee
51 Monroe Street, Suite 1406
Rockville, MD 20850

Identification Number: C00180992

Kathleen Neary, Treasurer
Delegates for Mondale Committee
28 West Laughead Avenue
Boothwyn, PA 19061

Identification Number: C00181008

Chester J. Straub, Treasurer
At-Large Delegates for Mondale
153 East 53 Street
New York, NY 10022

Identification Number: C00181016

Ralph A. Coldiron III, Treasurer
Kentucky At Large Delegates for
Mondale Committee
1513 Pinemeadow Drive
Lexington, KY 40504

Identification Number: C00181024

8504053 17

Steven D. Goldenkranz, Treasurer
10th Congressional District
Delegates for Mondale
1551 East 23rd Street
Brooklyn, NY 11210

Identification Number: C00181032

Louis Nicolella, Treasurer
North Country Delegates for Mondale
68 Third Street
Gloversville, NY 12078

Identification Number: C00181107

Lawrence Rosenweiz, Treasurer
Delegates for Mondale - Kings/
Richmond 11th C D
274 Lafayette Avenue
Brooklyn, NY 11238

Identification Number: C00181115

William Steinman, Treasurer
Delegates for Mondale 12th
C D Kings/Richmond
2044 East 18th Street
Brooklyn, NY 11229

Identification Number: C00181123

Barbara Capon, Treasurer
Delegates for Mondale 13th
C D Kings/Richmond
2940 Ocean Parkway
Brooklyn, NY 11235

Identification Number: C00181131

Mary Ellen Hunold, Treasurer
Delegates for Mondale - Kings/
Richmond 14th C D
157 Prescott Avenue
Staten Island, NY 10306

Identification Number: C00181149

Jeffery George, Treasurer
17th District Mondale Delegate
Committee
445 Catalina Avenue
Youngstown, OH 44504

Identification Number: C00181156

Evelyn L. Rockas, Treasurer
28th Congressional District
Delegates for Mondale Committee
P.O. Box 61
Ithaca, NY 14851

Identification Number: C00181297

Kenneth C. Kruly, Treasurer
Erie County Delegates for
Mondale
220 Delaware Avenue
Buffalo, NY 14202

Identification Number: C00181305

Blake Wordal, Treasurer
Montana At Large Delegates
for Mondale Committee
846 East 6th Avenue
Helena, MT 59601

Identification Number: C00181313

Melinda T. Vance, Treasurer
Tarrant County Delegate Commitee
3901 Mockingbird Lane
Fort Worth, TX 76109

Identification Number: C00181362

Roger Duncan, Treasurer
14th District Mondale Delegate
Committee
1407A Bridgeway
Austin, TX 78704

Identification Number: C00181370

8540553 17

Heyward Davenport, Treasurer
16th C D Delegates for Mondale
1270 Fifth Avenue - 2R
New York, NY 10029

Identification Number: C00181388

Craig Heller, Treasurer
Long Island Mondale
4th C D Committee
2919 Bond Drive
Merrick, NY 11566

Identification Number: C00181396

Thomas E. Mellon Jr., Treasurer
Mondale Delegate Team
East Court Street
Doylestown, PA 18901

Identification Number: C00181404

Howard A. Roitman, Treasurer
Mondale Colorado Delegate
Selection Committee - Statewide
2225 Birch Street
Denver, CO 80207

Identification Number: C00181412

Ellen O. Moyer, Treasurer
4th District Delegates
for Mondale
44 Madison Place
Annapolis, MD 21401

Identification Number: C00181420

Kevin D. O'Connor, Treasurer
5th Congressional District
Mondale Delegate Committee
538 N32
Milwaukee, WI 53208

Identification Number: C00181438

8 5 0 4 0 5 5 3 2 0

John E. McAuliffe, Treasurer
27th Congressional District
Delegates for Mondale
236 Erie Boulevard East
Syracuse, NY 13202

Identification Number: C00181586

Dorothy J. Sievers, Treasurer
Cuyahoga County Mondale
Delegates Committee
14018 Clifford Avenue
Cleveland, OH 44135

Identification Number: C00181594

Barbara Levin, Treasurer
Prince George's Delegates
for Mondale
3505 Burleigh Drive
Mitchellville, MD 20716

Identification Number: C00181602

Stephen J. Wing, Treasurer
21st District Friends of Walter
Mondale Delegates
94 Market Street
P.O. Box 910
Poughkeepsie, NY 12602

Identification Number: C00181719

Diane M. Carr, Treasurer
L I - Mondale 2nd
Congressional District
P.O. Box 555
Lindenhurst, NY 11757

Identification Number: C00181727

Frank Herrera, Treasurer
26th District Mondale Delegate
Committee
111 West Laurel Suite 101
San Antonio, TX 78212

Identification Number: C00181735

8504055321

Millie Bruner, Treasurer
23rd District Mondale Delegate
Committee
2107 McKinney
Dallas, TX 75201

Identification Number: C00181743

Barry M. McCoy, Treasurer
Long Island Mondale, First
C D Delegates
49 Thompson Hay Path
Setauket, NY 11733

Identification Number: C00181925

Paul E. Haney, Treasurer
Haney, Mains, Rankin, Trobia
Delegate Committee
c/o 3 Tacoma Street
Rochester, NY 14613

Identification Number: C00181941

Larry Larocco, Treasurer
Idaho Delegates for Mondale
537 West Bannock, Suite 201
Boise, ID 83702

Identification Number: C00181966

8504053222

Lawrence M. Vincent, Treasurer
Mondale Delegate At Large
Committee for MD
16 East Lombard Street - 310, MD
Baltimore, MD 21202

Identification Number: C00181974

David J. Cantelme, Treasurer
Arizona Mondale Delegate
Committee
826 North Central Avenue
Phoenix, AZ 85003

Identification Number: C00182139

Janet Epstein, Treasurer
11th Congressional District
Mondale Delegate Committee
520 South El Camino Real
Suite 520
San Mateo, CA 94402

Identification Number: C00182303

Alma Bell, Treasurer
Seventh District Delegates
for Mondale
538 West Lafayette
Baltimore, MD 21217

Identification Number: C00182311

Janet E. Bald, Treasurer
Southern Tier Committee
for Mondale
135 1/2 North 6th Street
Olean, NY 14760

Identification Number: C00182329

Peter W. Swenty, Treasurer
1st and 2nd Districts
Delegates for Mondale
607 Terrace Hilton
15 West 6th Street
Cincinnati, OH 45202

Identification Number: C00182337

8504053273

Jurgen Worthing, Treasurer
Long Island Mondale Committee
75 Weaving Lane
Wantagh, NY 11793

Identification Number: C00182360

William D. Angel Jr., Treasurer
4th District Mondale Delegate
Committee
1424 Lowell
Lima, OH 45805

Identification Number: C00182410

Helen Russell Allegrone, Treasurer
Guilford Delegates for Mondale
1803 Rolling Road
Greensboro, NC 27403

Identification Number: C00182543

William H. Simons, Treasurer
Mondale Delegates - D C
1917 Randolph Street, NE
Washington, DC 20018

Identification Number: C00182550

Paddi Valentine, Treasurer
Mondale 3rd District Delegate
Selection Committee
Stockton Lane
Richmond, VA 23221

Identification Number: C00182774

Joseph Miller, Treasurer
Mondale 19 CD Delegate Committee
100-7 Alcott Place
Bronx, NY 10475

Identification Number: C00182899

8304053241

Susan K. Sweeney, Treasurer
37th Congressional District
Delegate Advisory Committee
1766 Camino Parocela
Palm Springs, CA 92262

Identification Number: C00182998

Meade Emory, Treasurer
At Large Delegates for Mondale
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Seattle, WA 98111

Identification Number: C00183004

Dan Watkins, Treasurer
Kansas Mondale At Large Delegate
Committee
1645 Barker
Lawrence, KS 66044

Identification Number: C00183178

Marsha Murphy, Treasurer
Western Missouri Mondale
Delegates Committee
220 West Armour Boulevard
Kansas City, MO 64111

Identification Number: C00183186

Leon Shull, Treasurer
ADA Campaign Committee
1411 K Street, NW
Washington, DC 20005

Identification Number: C00176867

8504053253

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 18, 1984

Kenneth J. Doran, Esq.
Smoler, Albert & Rostad
119 Monona Avenue - Suite 520
Madison, Wisconsin 53703

Re: MUR 1667
Wisconsin At-Large Delegate Committee

Dear Mr. Doran:

This responds to your May 15, 1984, request for an extension of time in which to respond to the complaint in the above-captioned matter. On May 17, 1984, the Commission considered your request and granted the Committee ten days extension of time. Thus, your response is due May 24, 1984.

Should you have any questions regarding this matter, please contact Stephen Mims, the attorney assigned to this matter at (202)523-4143.

Sincerely,

Charles N. Steele
General Counsel

8504050532 6

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 1667
Wisconsin At-Large Delegates Committee	)	
	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on May 17, 1984, the Commission decided by a vote of 4-1 to take the following actions in MUR 1667:

1. Approve a ten day extension of time in which to respond to the complaint and supplements for the Wisconsin At-Large Delegates Committee.

2. Approve and send the letter as attached to the May 16, 1984 Memorandum to the Commission.

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

Attest:

5-17-84
Date

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

Received in Office of Commission Secretary: 5-16-84, 12:16
Circulated on 24 hour tally basis: 5-16-84, 1:00

8504053027

FEDERAL ELECTION COMMISSION
WASHINGTON D C 20463

MEMORANDUM TO: CHARLES N. STEELE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/JODY C. RANSOM

DATE: MAY 17, 1984

SUBJECT: COMMENTS RE: MUR 1667 - Memorandum to the Commission dated May 16, 1984

Attached is a copy of Commissioner Reiche's vote sheet with comments regarding his objection to the above-captioned matter, for record purposes only.

Attachment:
copy of vote sheet

8504050532 9

KOD

SENSITIVE

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

84 MAY 16 P 4:27

Date and Time Transmitted: WEDNESDAY, 5-16-84, 1:00

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

RETURN TO COMMISSION SECRETARY BY THURSDAY, MAY 17, 1984, 1:00

SUBJECT: MUR 1667 - Memorandum to the Commission dated May 16, 1984

( ) I approve the recommendation

(✓) I object to the recommendation

COMMENTS: This is an objection for the record.

Date: 5/16/84 Signature: Frank P. Reiche

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

PLEASE RETURN ONLY THE BALLOT TO THE COMMISSION SECRETARY.

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

From the Office of the Commission Secretary

8504050329

SENSITIVE

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

84 MAY 16 P12: 18

May 16, 1984

MEMORANDUM TO: The Commission

FROM: Charles N. Steele
General Counsel

SUBJECT: Request for Extension of Time in Which To Respond to the Complaint in MUR 1667

On May 15, 1984, the General Counsel's Office received a request for a 15 day extension of time in which to respond to the complaint and supplements in MUR 1667 from counsel for the Wisconsin At-Large Delegates Committee ("Committee").

Counsel cites as the basis for the request, the Committee's difficulty in retaining counsel. The first counsel retained withdrew due to a possible conflict of interest and the second counsel contacted was unable to handle the matter in a timely fashion. The Committee retained present counsel on May 14, 1984, one day before the response was due.

In light of the Committe's difficulty in retaining counsel, the Office of the General Counsel recommends that the Commission grant the Committee's request for an extension of time. In an effort to proceed expeditiously, however, this Office further recommends that the extension be limited to ten days.

Recommendations

1. Approve a ten day extension of time in which to respond to the complaint and supplements for the Wisconsin At-Large Delegates Committee.

2. Approve and send the attached letter.

Attachments
1. Request from the Wisconsin At-Large Delegates Committee.

2. Proposed letter.

8 0 4 0 5 5 3 3 0

RECEIVED BY THE FEC
GCC #3164
84 MAY 15 P1:23

SMOLER, ALBERT & ROSTAD

ATTORNEYS AT LAW

119 MONONA AVENUE - SUITE 320

MADISON, WISCONSIN 53703

WILLIAM W. SMOLER
JOHN C. ALBERT
THOMAS J. ROSTAD
C. WILLIAM FOUST
KENNETH J. DORAN

TELEPHONE
608/255-3000

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 P2:50

8504005331

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

ATTACHMENT 1 (1)

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

8504050533 2

(2)

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1667

NAME OF COUNSEL: Kenneth J. Doran

ADDRESS: 119 Monona Ave. Suite 520
Madison, WL 53703

TELEPHONE: (608) 255-8000

'84 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

8504050533

(3)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Kenneth J. Doran, Esq.
Smoler, Albert & Rostad
119 Monona Avenue - Suite 520
Madison, Wisconsin 53703

Re: MUR 1667
Wisconsin At-Large Delegate Committee

Dear Mr. Doran:

This responds to your May 15, 1984, request for an extension of time in which to respond to the complaint in the above-captioned matter. On May , 1984, the Commission considered your request and granted the Committee ten days extension of time. Thus, your response is due May 24, 1984.

Should you have any questions regarding this matter, please contact Stephen Mims, the attorney assigned to this matter at (202)523-4143.

Sincerely,

Charles N. Steele
General Counsel

8504005033 4

ATTACHMENT 2 (4)

Notifications Mailed on May 11, 1984

David J. Cantelme, Treasurer
Arizona Mondale Delegate
Committee
826 N. Central Avenue
Phoenix, AZ 85003

Janet Epstein, Treasurer
11th Congressional District
Mondale Delegate Committee
520 S. El Camino Real
Suite 520
San Mateo, CA 94402

Ray Castell-Blanch, Treasurer
Mondale Delegate Election
Committee - 6th C D
1518 5th Avenue
San Rafael, CA 94901

Howard A. Roitman, Treasurer
Mondale Colorado Delegate
Selection Committee Statewide
2225 Birch Street
Denver, CO 80207

Susan K. Sweeney, Treasurer
37th Congressional District
Delegate Advisory Committee
1766 Camino Parocela
Palm Springs, CA 92262

Leon Shull, Treasurer
ADA Campaign Committee
1411 K. Street, N.W.
Washington, D.C. 20005

George E. Comerford, Treasurer
14th C D For Mondale
5844 Western Way
Lake Worth, FL 33463

J. Gordon Pennington, Treasurer
C D #1 Delegates For Mondale
7830 North Palafox Street
Pensacola, FL 35214

Jo Anna Conte, Treasurer
C D 2 Delegates For Mondale,
Florida
P.O. Box 10403
Tallahassee, FL 32302

8504053

Calvin D. DeVoney, Treasurer
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P.O. Box 668, 3141 Howland Blvd.
Orange City, FL 32763

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Delegates For Mondale
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Bradenton, FL 33529

Cheryl B. Frazier, Treasurer
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Delegates For Mondale
1310 West Colonial Drive
Suite 29
Orlando, FL 32804

James L. Ghiotto, Treasurer
Congressional District 7
Delegates For Mondale
2925 Alline Avenue
Tampa, FL 33611

LaVaunne Miller, Treasurer
Congressional District 9
Delegates For Mondale
24 Meadow Lark Lane
Land O'Lakes, FL 33539

Samuel C. Catherwood, Treasurer
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P.O. Box 8796
1100 Cesery Blvd
Jacksonville, FL 32211

Robert D. Parks, Treasurer
Mondale 15th District
Delegate Committee
440 S. Andrews Avenue
Ft Lauderdale, FL 33301

Angelique O. Stahl, Treausrer
Mondale 16th District Delegate
Committee
11621 N W 23rd Street
Pembroke Pines, FL 33026

8504053536

Sue Moore, Treasurer
Mondale Delegates
Congressional
District #8
94 Baywood Avenue
Clearwater, FL 33575

Melinda Greiner, Treasurer
Mondale Delegates, Congressional
District #13
1625 Winkler Avenue
Ft. Myers, FL 33901

Nancy Miller, Treasurer
Northern 12th Congressional
District Delegates For
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2129 S E Holland Street
Port St. Lucie, FL 33452

Robert A. Sugarman, Treasurer
South Florida Delegates For
Mondale
P.O. Drawer 520337
1951 N W 17th Avenue
Miami, FL 33152

Larry Laroco, Treasurer
Idaho Delegates For Mondale
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Boise, ID 83702

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Buffalo Grove, IL 60090

George Moser, Treasurer
12th District Mondale
Delegate Committee
2200 West Higgins Road
Hoffman Estates, IL 60195

Joan P. Murphy, Treasurer
13th Congressional District
Delegate Committee For
Walter F. Mondale
11601 South Pulaski
Alsip, IL 60658

Jerome C. Shapiro, Treasurer
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Mondale
7 Pheasant Run
Dekalb, IL 60115

Herman L. Dammerman, Treasurer
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Mondale
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Normal, IL 61761

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Rock Island, IL 61201

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2431 E. Harrison
Charleston, IL 61920

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Chicago, IL 60619

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Forsyth, IL 62535

William H. Taylor, II, Treasurer
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8504053398

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Chicago, IL 60618

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6156 N. Knox
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8504053405

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Heyward Davenport, Treasurer
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P.O. Box 910
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130 North Main Street
New City, NY 10956Mr. Thompson

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11 North Pearl Street, Rm 1608
Albany, NY 12207Mr. Gersowitz

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236 Erie Boulevard East
Syracuse, NY 13202Mr. McAuliffe

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New Hartford, NY 13413

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Staten Island, NY 10306

8504005342

William Steinman, Treasurer
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Brooklyn, NY 11229

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Delegate Committee
& 3 Tacoma Street
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Lima, OH 45805

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Delegate Committee for Mondale
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Washington, PA 15301

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Philadelphia, PA 19152

Elizabeth McCurdy, Treasurer
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Mondale Delegates
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Delegate Committee for Mondale
16th Congressional District
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8505053453

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Delegates for Mondale Committee
28 West Laughead Avenue
Boothwyn, PA 19061

Joseph P. Manko, Treasurer
Mondale 13th Delegate Committee
12th Floor Packard Building
Philadelphia, PA 19102

William H. Kerr, Treasurer
Mondale Delegate Committee -
12th Congressional District
303 South Warren Avenue
Apollo, PA 15613

Thomas E.Mellon, Jr, Treasurer
Mondale Delegate Team
East Court Street
Doylestown, PA 18901

Kathleen Smith, Treasurer
Mondale Delegates - 20th District
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Pittsburgh, PA 15218

Lawrence P. Murin, Treasurer
Mondale Delegates Committe
422 Douglass Street
Reading, PA 19601

Gerard S. Ziegler, Treasurer
Ninth Congressional District
Delegates For Mondale
3332 Broad Avenue
Altoona, PA 16601

Richard Brabender, Treasurer
PA 14th Congressional District
Delegates For Mondale
3411 Library Road
Pittsburgh, PA 15234

Art Rooney, II, Treasurer
PA 18th Congressional District
Delegates For Mondale
1 Oxford Ctr, 40th fl
Pittsburgh, PA 15219

8504053345

Susan D. Carle, Treasurer
Pennsylvania 17th Congressional
District Delegates For Mondale
1037 Maclay Street
Harrisburg, PA 17103

Anthony McNeil, Treasurer
Second Congressional District
Delegates For Mondale
632 May Place
Philadelphia, PA 19139

Salvatore Mancini, Treasurer
1st District Delegate Committee
For Mondale
1910 Smith Street, Suite 9
N. Providence, RI 02911

Joseph DeLorenzo, Treasurer
2nd District Delegate Committee
For Mondale
1910 Smith Street, Suite 9
N. Providence, RI 02911

Roger Duncan, Treasurer
14th District Mondale
Delegate Committee
1407A Bridgeway
Austin, TX 78704

Millie Bruner, Treasurer
23rd District Mondale
Delegate Committee
2107 McKinney
Dallas, TX 75201

Frank Herrera, Treasurer
26th District Mondale Delegate
Committee
111 West Laurel, Suite 101
San Antonio, TX 78212

Melinda T. Vance, Treasurer
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Fort Worth, TX 76109

Ann M. Yarborough, Treasurer
Arlington Mondale Delegate
Committee
5140 North 37th Street
Arlington, VA 22207

8504055347

Paddi Valentine, Treasurer
Mondale 3rd District Delegate
Section Committee
Stockton Lane
Richmond, VA 23221

Meade Emory, Treasurer
At-Large Delegates For
Mondale
P.O. Box 21742
Seattle, WA 98111

Steven D. Goldenkranz
10th C.D. Delegates for Mondale
1551 East 23rd Street
Brooklyn, NY 11210

8504050534 8

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 16, 1984

James Ghiotto, Treasurer
Congressional District 7
Delegates for Mondale
2925 Alline Avenue
Tampa, FL 33611

RE: MUR 1667

Dear Mr. Ghiotto:

This letter responds to your telephone conversation with Stephen Mims of this Office today, at which time you informed Mr. Mims that you did not receive a copy of the complaint in the above-captioned MUR. On May 11, 1984, a notice was sent to you advising you that a complaint had been filed alleging possible violations of the Act by your committee and you, as treasurer. It appears, however, that a copy of the complaint was inadvertently omitted. Mr. Mims has informed me that you did indicate that you received the three supplements to the complaint. We have, therefore, enclosed a copy of the complaint as filed with the Commission on April 6, 1984. Due to the fact that you did not initially receive a copy of the complaint, you will be afforded the full fifteen days in which to submit a response to the complaint from receipt of this letter.

Should you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143.

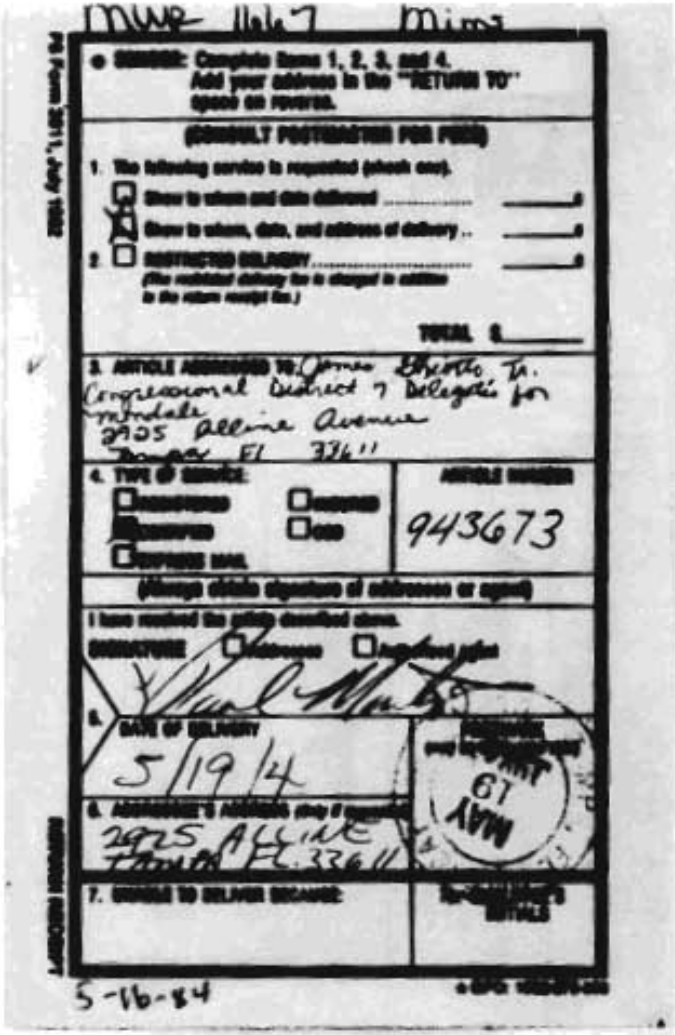
Sincerely,

Charles N. Steele
General Counsel

by: Lawrence M. Noble
Deputy General Counsel

8504053050

8504050535 1



MWR 11617 Mims

PS Form 3811, July 1983

• 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: James Elliott Jr.
Congressional District 7 Delegate for
Immediate
2905 Alline Avenue
Tampa FL 33611

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

ARTICLE NUMBER
943673

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
5/19/4

6. ADDRESSEE'S ADDRESS (Only if requested)
2905 ALLINE
TAMPA FL 33611

MAY 19

7. UNABLE TO DELIVER BECAUSE:

STAMP

5-16-84

RETURN RECEIPT

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary

FROM: Office of General Counsel

DATE: May 15, 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	[x]	Other (see distribution below)	[ ]

SENSITIVE - CIRCULATE ON PINK PAPER

24 HOUR TALLY VOTE

8504053534

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary

FROM: Office of General Counsel

DATE: May 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	[x]	Other (see distribution below)	[ ]

24-HOUR TALLY VOTE BASIS

SENSITIVE

CIRCULATE ON PINK PAPER

8504005357

KAG --

Whenever letters are mailed out pursuant to COMM action (have certifi.) copies are sent informationally to COMM. In this instance, cover memo is included mostly to clarify Attachment #2 since the only item being circulated is a sample letter together with a listing of committees which received the letter.

C.

5/14

8504050539

This letter sent out (RTB notification to Mondale Cmte) by hand-delivery (by 5th Flr) on 5-10-84. Copy given to Pat Bartanen for CNS' back-up. Other copies held -- distribute with copies of 115 or 131 (whatever outrageous number it finally ends up being) which are to go out also authorized by the attached Certification

Steve Mims copy of Certification is also attached

8504050536 1

ROUTING SLIP FOR RTB LETTERS

TO: Chairman/Vice Chairman

FROM: OGC Enforcement Docket

DATE: May 10, 1984

MUR # 1667

Date RTB Found May 8, 1984

Date Cert. Rec'd in OGC May 9, 1984

Staff Assigned S. Mine

STAFF INITIAL & DATE BELOW AND ON LETTERS:

✓ Accuracy

✓ Enclosures

✓ Certification 5/10/84

Date Rec'd in OGC From Chairman/Vice Chairman

5/10/84

8504055362

FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

TO: Steve/Lois DATE: 5/9/84

FROM: Cheryl

- ☐ 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:

The attached Certification does not refer to the following:

(1) The motion which was passed indicating OGC has authority to notify Mondale Cmte orally as well as in writing of action taken by Comm on 5/8/84

(2) Nor does certification include motion which passed indicating OGC should notify Mondale Cmte of other respondent's which by Comm action of 5/8 will be informed of Complaint & Supplements

GPO 923-806

FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

TO: Steve

DATE: 5/9/84

FROM: Cheryl

- ☐ 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

Pursuant to Comm action on 5/9, this ltr needs to be revised - Per KAG's mem Circulation procedures, ltr must be approved by KAG prior to mailing, etc.

GPO 823-906

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary

FROM: Office of General Counsel

DATE: May 7, 1984

SUBJECT: MUR 1667 - First General Counsel's Report

The attached is submitted as an Agenda document for the Commission Meeting of May 8, 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)	[ ]

SENSITIVE - CIRCULATE ON PINK PAPER - ON AGENDA MAY 8, 1984

8504050536

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

BY HAND

David M. Ifshin, Esquire
Carolyn U. Oliphant, Esquire
Mondale for President Committee, Inc.
2201 Wisconsin Avenue
Suite 100
Washington, D.C. 20007

MUR 1667

Dear Mr. Ifshin and Ms. Oliphant:

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 and again on April 27, 1984, the Commission received supplemental submissions from the complainant. Copies of those submissions have been forwarded to you. The Commission concluded that both of those supplemental submissions were not amendments to the complaint, but rather supplemented the arguments and facts already presented in the complaint.

On May , 1984, the Commission considered the matter and determined that the materials submitted by the complainant on May 2, 1984, also constitute a supplement to the complaint. Therefore, the Commission will proceed with its consideration of this matter pursuant to your earlier notifications. Accordingly, submission of this additional material will not result in the provision of a specific time period for response.

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202)523-4143.

Sincerely,

Charles N. Steele
General Counsel

OK AM 5/15/84

8504055369

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary

FROM: Office of General Counsel

DATE: May 3, 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	[X]	Other (see distribution below)	[ ]

SENSITIVE

CIRCULATE ON PINK PAPER

24 HOUR ~~NO OBJECTION~~ TALLY VOTE BASIS

8504005367

ROUTING SLIP

___ Improper Complaint ltr.

___ No Jurisdiction ltr.

10 Respondent Notification ltr.

___ Complainant Notification ltr.

___ Other:

To CNS from KJ on 5/3/84 for signature

To Docket from CNS/pw on 5/4/84 for mailing

8504050537

OK Stamp
5/3/84

ROUTING SLIP

___ Improper Complaint ltr.

___ No Jurisdiction ltr.

H Respondent Notification ltr.

~~X~~ Complainant Notification ltr.

___ Other:

To CNS from H on 5/3/84 for signature

To Docket from CNS on 5/4/84 for mailing

8504050077

OK
5/3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

BY HAND

David M. Ifshin, Esquire
Carolyn U. Oliphant, Esquire
Mondale for President Committee, Inc.
2201 Wisconsin Avenue
Suite 100
Washington, D.C. 20007

MUR 1667

Dear Mr. Ifshin and Ms. Oliphant:

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, the Commission received a supplemental submission from the complainant. A copy of that submission was forwarded to you.

On April 27, the Commission received another submission from the complainant also pertaining to the allegations in the complaint. A copy of that submission was forwarded to you on April 30, 1984. A separate letter from the Office of the General Counsel was delivered to you on that day indicating that the Commission would decide whether the additional materials that were submitted on April 27, 1984, would be considered as a supplement or as an amendment to the complaint.

On May 1, 1984, the Commission considered the matter and determined that the materials that were submitted by the complainant on April 27, 1984, constitute a supplement to the complaint. Therefore, the Commission will proceed with its consideration of this matter pursuant to your earlier notifications. Accordingly, submission of this additional material will not result in a specific time period for response.

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

OK
5/3/84

3504053753

FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

MEMORANDUM

TO: Office of the Commission Secretary

FROM: Office of General Counsel

DATE: April 30, 1984

SUBJECT: MUR 1667 - Memorandum to The Commission

The attached is submitted as an Agenda document for the Commission Meeting of MAY 1, 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)	[ ]

SENSITIVE

CIRCULATE ON PINK PAPER

8504053537 1

DELEGATE
QUARTERLY
UNAUTHORIZED

COMMITTEE ID: C00181438

5TH CONGRESSIONAL DISTRICT MONDALE DELEGATE COMMITTEE
KEVIN D O'CONNOR
538 N32

MILW WI 53208

DELEGATE
QUARTERLY
UNAUTHORIZED

COMMITTEE ID: C00177840

22ND CONGRESSIONAL DISTRICT DELEGATES FOR MONDALE
PATRICK C BRUMLEVE
PO BOX 111

COBDEN IL 62920

DELEGATE
QUARTERLY
UNAUTHORIZED

COMMITTEE ID: C00175596

FOURTH DISTRICT MONDALE DELEGATE COMMITTEE
TERRIE L HANUS
1210 TIMBER PLACE APT 1B

NEW LENOX IL 60451

DELEGATE
QUARTERLY
UNAUTHORIZED

COMMITTEE ID:

NORTH DAKOTA DELEGATES FOR MONDALE COMMITTEE
70 N 5
FARGO, NORTH DAKOTA 58107
Nicholas Spaeth, Treasurer

KENTUCY AT-LARGE DELEGATES FOR MONDALE COMMITTEE
Ralph Coldiron, Treasurer
1513 Pinemeadow Drive
Lexington, Kentucky 40504

FEDERAL ELECTION COMMISSION DATE 05/01/84
COMMITTEE CROSS INDEX

COMMITTEE ID: C00176909

N H 1ST DISTRICT DELEGATES FOR MONDALE
NANCY RYAN
5 HAINES

MERRIMACK NH 03054

DELEGATE
QUARTERLY
UNAUTHORIZED

COMMITTEE ID: C00176891

N H 2ND DISTRICT DELEGATES FOR MONDALE
ANTHONY REDINGTON
4 NEIL DRIVE

ALLENSTOWN NH 03275

DELEGATE
QUARTERLY
UNAUTHORIZED

COMMITTEE ID: C00181024

KENTUCKY AT LARGE DELEGATES FOR MONDALE COMMITTEE
RALPH A COLDIRON III
1513 PINEMEADOW DRIVE

LEXINGTON KY 40504

DELEGATE
QUARTERLY
UNAUTHORIZED

COMMITTEE ID: C00181313

MONTANA AT LARGE DELEGATES FOR MONDALE COMMITTEE
BLAKE WORDAL
846 E 6TH AVE

HELENA MT 59601

DELEGATE
QUARTERLY
UNAUTHORIZED

COMMITTEE ID: C00179697

6TH DISTRICT DELEGATES FOR MONDALE COMMITTEE
LARRY D OWEN
1019 HUNTINGTON

EAST LANSING MI 48823

8504050053777

(not registered)

Kansas At-Large Delegate Committee
c/o Terry Scanlon
715 W. 10th Street
Topeka, KS 66612

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

8504005538

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 23, 1984

MEMORANDUM

TO : The Commission

FROM : Charles N. Steele
General Counsel

SUBJECT: MUR 1667

On April 12, 1984, the Commission voted to schedule a special executive session for Thursday, April 26, 1984, to start at the conclusion of the open session in order to consider MUR 1667. However, at the special executive session held on Friday, April 20, 1984, the Commission voted 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 in MUR 1667.

In view of the granting of the extension of time, it appears that it will not be necessary to hold the special executive session scheduled for Thursday, April 26, 1984. Thus, the Office of General Counsel recommends that it be cancelled.

RECOMMENDATION:

Cancel the special executive session scheduled on April 26, 1984.

8504053082

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 16, 1984

James Ghiotto, Treasurer
Congressional District 7
Delegates for Mondale
2925 Alline Avenue
Tampa, FL 33611

RE: MUR 1667

Dear Mr. Ghiotto:

This letter responds to your telephone conversation with Stephen Mims of this Office today, at which time you informed Mr. Mims that you did not receive a copy of the complaint in the above-captioned MUR. On May 11, 1984, a notice was sent to you advising you that a complaint had been filed alleging possible violations of the Act by your committee and you, as treasurer. It appears, however, that a copy of the complaint was inadvertently omitted. Mr. Mims has informed me that you did indicate that you received the three supplements to the complaint. We have, therefore, enclosed a copy of the complaint as filed with the Commission on April 6, 1984. Due to the fact that you did not initially receive a copy of the complaint, you will be afforded the full fifteen days in which to submit a response to the complaint from receipt of this letter.

Should you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

by: Lawrence M. Noble
Deputy General Counsel

8504050538

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Letter to Mondale) Agenda Document #X84-032
Delegate Committees)

CERTIFICATION

I, Mary W. Dove, Recording Secretary for the Federal Election Commission executive session on May 15, 1984, do hereby certify that the Commission decided by a vote of 6-0 to approve the Staff Director's recommendation that the Reports Analysis Division send the attachment letter included with Agenda Document #84-032, to the Mondale Delegate Committees, amended as follows:

Paragraph 2, Line 3, change the word, first, to the word, required

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

Attest:

5-15-84
Date

Mary W. Dove
Recording Secretary

8504055381

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 15, 1984

James M. Beck, Esquire
Pepper, Hamilton & Sheetz
2001 The Fidelity Building
123 South Broad Street
Philadelphia, PA 19103

Re: MUR 1667
Mondale At-Large
Delegates Committee

Dear Mr. Beck:

This is in response to your request of May 11, 1984, that the Commission reconsider its May 10, 1984, decision to deny you an extension of time in which to respond to the complaint and supplements in the above-captioned MUR. The Commission considered your request, and on May 15, 1984, decided to afford you an additional fifteen days from your May 10, 1984, receipt of the supplemental materials in which to submit a response.

Should you have any additional questions, please contact Stephen H. Mims, the attorney assigned to this matter at (202)523-4143.

Sincerely,

Charles N. Steele
General Counsel

8504050530 3

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Extension Request for)
Pennsylvania Delegates) MUR 1667
At-Large for Mondale)
Committee)

CERTIFICATION

I, Mary W. Dove, Recording Secretary for the Federal Election Commission executive session on May 15, 1984, do hereby certify that the Commission decided by a vote of 6-0 to grant a fifteen day extension from May 10 to the Pennsylvania Delegates At-Large for Mondale Committee in which to respond to the supplementary materials which they received on that date, this fifteen days to expire on May 25, 1984.

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

Attest:

5-15-84
Date

Mary W. Dove
Mary W. Dove
Recording Secretary

8504053986

SENSITIVE

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

84 MAY 15 A 9:48

May 15, 1984

MEMORANDUM

TO: The Commission

FROM: Charles N. Steele
General Counsel

SUBJECT: Request for Reconsideration of Commission Decision of May 10, 1984

On May 10, 1984, the Commission considered a request submitted by the Mondale At-Large Delegates Committee of Pennsylvania for an extension of time in which to file a response to the complaint and its supplements in MUR 1667. The Commission voted to deny the request.

On May 14, 1984, the Office of the General Counsel received a letter from the Mondale At-Large Delegates Committee of Pennsylvania requesting that the Commission reconsider its decision of May 10. Counsel cites as a basis for the request for reconsideration, new allegations raised in the supplemental materials submitted to the Commission on April 27, 1984, by the complainant. (The supplement was forwarded to the Committee on May 4, 1984.) Counsel contends that the supplement is actually an amendment to the complaint and, therefore, that the Mondale At-Large Delegates Committee of Pennsylvania, should be afforded an additional fifteen days in which to respond to the supplement.

The Commission considered the issue whether the submission of April 27, 1984, constituted an amendment or a supplement to the complaint in Executive Session on May 1, 1984. At that time, the Commission voted that the additional materials submitted by the complainant on April 27, 1984, constituted a supplement to the complaint. Accordingly, the Commission decided that no specific time period would be granted to respond to the supplemental material. The Office of the General Counsel recommends, therefore, that the Commission deny the request for reconsideration of its decision of May 10, 1984.

8504053097

Recommendations:

1. Deny the request submitted by the Mondale At-Large Delegates Committee of Pennsylvania for reconsideration of Commission's decision of May 10, 1984, wherein a request for an extension of time in which to respond to the complaint was denied.

2. Approve and send the attached letter.

Attachments

1. Request from the Mondale At-Large Delegates Committee of Pennsylvania.

2. Proposed letter.

8504050539

RECEIVED BY THE FEC
MUR #1667
84 MAY 14 A10:18

PEPPER, HAMILTON & SCHEETZ

ATTORNEYS AT LAW

1776 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 (#465) 215-981-4750 · (#3900) 215-981-4884
DEX (#3600) 215-981-4777 · TWX 710-670-0777

400 SOUTH OLIVE STREET
LOS ANGELES, CA 90071
213-617-0151

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) 893-3995

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

Attach 1
Page 1

8504035389

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

Attach 1
page 2

8504055390

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

James M. Beck, Esquire
Pepper, Hamilton & Sheetz
2001 The Fidelity Building
123 South Broad Street
Philadelphia, PA 19103

Re: MUR 1667
Mondale At-Large
Delegates Committee

Dear Mr. Beck:

This letter is in response to your request of May 11, 1984, that the Commission reconsider its decision to deny you an extension of time in which to submit a response to the complaint in the above-captioned MUR. The Commission considered your request and decided on May , 1984, not to modify its decision of May 10, 1984. The Commission does not agree that the materials that were submitted by the complainant on April 27, 1984, constitute an amendment to the complaint. Accordingly, no additional time will be provided to respond to these materials.

Should you have any additional questions, please contact Stephen H. Mims, the attorney assigned to this matter at (202)523-4143.

Sincerely,

Charles N. Steele
General Counsel

8504050391

Attachment 2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 15, 1984

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

RE: MUR 1667

Dear Mr. Asplund:

You were previously sent copies of the complaint and supplements thereto submitted in the above-captioned matter. Additional supplemental materials have now been filed. Enclosed is a copy of such materials for your information.

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

by: Lawrence M. Noble
Deputy General Counsel

Enclosures

8504053939

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 15, 1984

Mondale At-Large Delegates Committee (PA)
James M. Beck, Esquire
Pepper, Hamilton & Sheetz
2001 The Fidelity Building
123 South Broad Street
Philadelphia, PA 19103

RE: MUR 1667

Dear Mr. Beck:

You were previously sent copies of the complaint and supplements thereto submitted in the above-captioned matter. Additional supplemental materials have now been filed. Enclosed is a copy of such materials for your information.

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

by: Lawrence M. Noble
Deputy General Counsel

Enclosures

8504050539 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 15, 1984

New York At-Large Delegates Committee
Ellen S. Oran, Esquire
Thomas D. Barr, Esquire
Cravath, Swaine & Moore
One Chase Manhattan Plaza
New York, New York 10005

RE: MUR 1667

Dear Ms. Oran and Mr. Barr:

You were previously sent copies of the complaint and supplements thereto submitted in the above-captioned matter. Additional supplemental materials have now been filed. Enclosed is a copy of such materials for your information.

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

by: Lawrence M. Noble
Deputy General Counsel

Enclosures

8504053941

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

New York At-Large Delegates Committee
Ellen S. Oran, Esquire
Thomas D. Barr, Esquire
Cravath, Swaine & Moore
One Chase Manhattan Plaza
New York, New York 10005

RE: MUR 1667

Dear Ms. Oran and Mr. Barr:

You were previously sent copies of the complaint and supplements thereto submitted in the above-captioned matter. Additional supplemental materials have now been filed. Enclosed is a copy of such materials for your information.

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

by: Lawrence M. Noble
Deputy General Counsel

Enclosures

8504055397

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

Peter Hearn, Esquire
James M. Beck, Esquire
Pepper, Hamilton & Sheetz
2001 The Fidelity Building
123 South Broad Street
Philadelphia, PA 19103

Re: MUR 1667
Mondale At-Large
Delegates Committee

Dear Messrs. Hearn and Beck:

This letter is in response to your request for an extension of time in which to file a response to the complaint and its supplements in the above-captioned matter. The Commission has considered your request and voted not to grant the extension. Your response is, therefore, due to the Commission no later than May 14, 1984.

Should you have any additional questions, please contact Stephen H. Mims, the attorney assigned to this matter at (202)523-4143.

Sincerely,

Charles N. Steele
General Counsel

8504050395

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Peter Hearn, Esquire
James M. Beck, Esquire
Pepper, Hamilton & Sheetz
2001 The Fidelity Building
123 South Broad Street
Philadelphia, PA 19103

Re: MUR 1667
Mondale At-Large
Delegates Committee

Dear Messrs. Hearn and Beck:

This letter is in response to your request for an extension of time in which to file a response to the complaint and its supplements in the above-captioned matter. The Commission has considered your request and voted not to grant the extension. Your response is, therefore, due to the Commission no later than May 14, 1984.

Should you have any additional questions, please contact Stephen H. Mims, the attorney assigned to this matter at (202)523-4143.

Sincerely,

Charles N. Steele
General Counsel

8504005397

5/10/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

Mr. Vincent E. Cohen, Esquire
Ms. Dianne O'Hara, Esquire
Hogan & Hartson
815 Connecticut Avenue, N.W.
Suite 500
Washington, DC 20006-4072

Re: MUR 1667
Mondale Delegates--D.C. Committee

Dear Mr. Cohen and Ms. O'Hara:

This letter is in response to your request for an extension of time in which to file a response to the complaint and its supplements in the above-captioned matter. The Commission has considered your request and voted not to grant the extension. Your response is, therefore, due to the Commission no later than May 14, 1984.

Should you have any additional questions, please contact Stephen H. Mims, the attorney assigned to this matter at (202)523-4143.

Sincerely,

Charles N. Steele
General Counsel

8504053399

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

Mr. Vincent H. Cohen, Esquire
Ms. Dianne O'Hara, Esquire
Hogan & Hartson
815 Connecticut Avenue, N.W.
Suite 500
Washington, DC 20006-4072

Re: MUR 1667
Mondale Delegates--D.C. Committee

Dear Mr. Cohen and Ms. O'Hara:

This letter is in response to your request for an extension of time in which to file a response to the complaint and its supplements in the above-captioned matter. The Commission has considered your request and voted not to grant the extension. Your response is, therefore, due to the Commission no later than May 14, 1984.

Should you have any additional questions, please contact Stephen H. Mims, the attorney assigned to this matter at (202)523-4143.

Sincerely,

Charles N. Steele
General Counsel

8504005399

5/10/84
SHM

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 11, 1984

Mr. Thomas D. Barr, Esquire
Ms. Ellen S. Oran, Esquire
One Chase Manhattan Plaza
New York, NY 10005

Re: MUR 1667
New York At-Large
Delegates for Mondale
Committee

Dear Mr. Barr and Ms. Oran:

This letter is in response to your request for an extension of time in which to file a response to the complaint and its supplements in the above-captioned matter. The Commission has considered your request and voted not to grant the extension. Your response is, therefore, due to the Commission no later than May 14, 1984.

Should you have any additional questions, please contact Stephen H. Mims, the attorney assigned to this matter at (202)523-4143.

Sincerely,

Charles N. Steele
General Counsel

8504035400

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

Mr. Thomas D. Barr, Esquire
Ms. Ellen S. Oran, Esquire
One Chase Manhattan Plaza
New York, NY 10005

Re: MUR 1667
New York At-Large
Delegates for Mondale
Committee

Dear Mr. Barr and Ms. Oran:

This letter is in response to your request for an extension of time in which to file a response to the complaint and its supplements in the above-captioned matter. The Commission has considered your request and voted not to grant the extension. Your response is, therefore,.due to the Commission no later than May 14, 1984.

Should you have any additional questions, please contact Stephen H. Mims, the attorney assigned to this matter at (202)523-4143.

Sincerely,

Charles N. Steele
General Counsel

8504055401

SHM
5/10/84

BEFORE THE FEDERAL ELECTION COMMISSION

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

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on MAY 10, 1984, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 1667:

1. Deny the requests for extension of time submitted by the Mondale Delegates --D.C. Committee, the New York At-Large Delegates Committee and the Mondale At-Large Delegates Committee (PA).

2. Approve and send the letters attached to the General Counsel's report dated May 9, 1984.

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

Attest:

5-10-84
Date

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

8504055400

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES N. STEELE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/JODY C. RANSOM

DATE: MAY 10, 1984

SUBJECT: OBJECTION - MUR 1667 Memorandum to the Commission dated May 9, 1984

The above-named document was circulated to the Commission on Thursday, May 10, 1984 at 9:00.

Commissioner Reiche submitted an objection to this matter this date.

This matter will be discussed in a special executive session on Thursday, May 10, 1984.

8504005403

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

84 MAY 9 P4: 07

May 9, 1984

MEMORANDUM

SENSITIVE

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, three requests for extensions of time to respond to the complaint in MUR 1667 that have been received from three delegate committees.

The first request was received by this Office on May 4, 1984, from counsel to the Mondale Delegates--D.C. Committee. The request is for an extension through May 27, 1984 (a fifteen day extension) and cites, inter alia, the need "to meet with several members of the [committee] in order to ascertain all the relevant facts in this case." The second request was received on May 7, 1984, from counsel to the New York At-Large Delegates for Mondale Committee. The request for an extension through May 30, 1984, cites as its basis, the absence of counsel and the resulting inability to ascertain the facts and analyze the legal issues in this case. The third request was received on May 9, 1984, from counsel to the Mondale At-Large Delegates Committee (PA). Counsel cites as the basis for the extension, the "delay arising from the necessity of forwarding the notification materials" to counsel together with the "press of other urgent business." The Office of the General Counsel recommends that in light of the Commission's intention to consider this matter expeditiously, the requests for extensions from the delegate committees not be granted.

8 5 0 4 0 1 7

Recommendations

The Office of the General Counsel recommends, therefore, that the Commission:

1) Deny the requests for extensions of time submitted by the Mondale Delegates--D.C. Committee, the New York At-Large Delegates Committee and the Mondale At-Large Delegates Committee (PA).

2) Approve and send the attached letters.

Attachments

1) Requests from the Mondale Delegates--D.C. Committee, the New York At-Large Delegate Committee and the Mondale At-Large Delegates Committee.

2) Proposed letters to the Mondale Delegates--D.C. Committee, the New York At-Large Delegate Committee and the Mondale At-Large Delegates Committee.

8504050540

Doc # 3045

LAW OFFICES OF

HOGAN & HARTSON

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

815 CONNECTICUT AVENUE

WASHINGTON, D. C. 20006--4078

(202) 331--4500

'84 MAY 7 P3:57

VINCENT H. COHEN, P.C.

DIRECT DIAL NUMBER

(202) 331--4566

CABLE "HOGANDER WASHINGTON"

TELEX: 89--2751, INTL. 64052

TELECOPIER (202) 331--4570,

331--2527 OR 331--4706

May 4, 1984

BY HAND

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

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

Dear Mr. Steele:

As counsel for the D.C. Committee for Mondale Delegates (see enclosed Statement of Designation of Counsel), I have recently received voluminous materials which include a complaint and supplement totaling over fifty pages and containing several, broadly drafted charges, a number of exhibits, and many other documents, all of which must be analyzed thoroughly in order to formulate an adequate response to every charge asserted by Americans With Hart, Inc. Furthermore, it will be necessary to meet with several members of the D.C. Committee to ascertain all the relevant facts in this case. All this must be accomplished in addition to counsel's already heavy caseload.

For these reasons, counsel for the D.C. Committee for Mondale Delegates hereby requests an extension of fifteen days from the original May 12, 1984 deadline in which to respond to the complaint filed against it, during which time counsel will be able to properly investigate and respond to all charges levied against the D.C. Committee.

Your assistance in this matter will be greatly appreciated.

Sincerely,

Vincent H. Cohen

Vincent H. Cohen

Enclosure

cc: (w/ enc.) Mondale Delegates - D.C. Committee
c/o Charlene Drew Jarvis
1200 Massachusetts Avenue, Northwest
Washington, D.C. 20005

Attachment 1
Page 1

8504050406

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1667

NAME OF COUNSEL: Vincent H. Cohen and Dianne O'Hara

ADDRESS: 815 Connecticut Avenue, N.W.
Suite 500
Washington, D.C. 20006-4072

TELEPHONE: (202) 331-4586

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

May 4, 1984
Date

Marlene Drewyors
Signature

RESPONDENT'S NAME: Mondale Delegates--D.C. Committee

ADDRESS: 1200 Massachusetts Avenue, N.W.
Washington, D.C. 20005

HOME PHONE:

BUSINESS PHONE: (202)289-6926

Attachment 1
Page 2

E. S. Oran
5 pp 1L fl

ONE CHASE MANHATTAN PLAZA
NEW YORK, N. Y. 10005

84 MAY 7 AM 8:08

7 PM 2:08

MUR 1667

May 2, 1984

Re: MUR 1667

Dear Mr. Steele:

Please be advised that Thomas D. Barr and I have agreed to represent the New York At-Large Delegates for Mondale Commission and its treasurer, Chester J. Straub, in the referenced matter.

Your letter to Mr. Straub dated April 26, 1984, inviting him to respond to the allegations set forth in the complaint and the supplement to the complaint, first came to our attention last Monday, May 30. Mr. Barr and I will undertake as promptly as possible to investigate those allegations and inquire into the legal issues they raise. However, Mr. Barr is currently out of the country and will not be returning to his office until next week. I understand that his business schedule requires him to be out of town again briefly shortly after his return to the United States.

In view of Mr. Barr's unavailability, and of our need to consult with our clients and to determine their status in this matter, we hereby request an extension of time to and including May 30, 1984 to respond to your letter of April 26 and the materials enclosed therewith.

Thank you.

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

Attachment 1
Page 3

8504055406

RECEIVED AT THE FEC
84 MAY 9 A9:15

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 19109-1099
215-563-2000
CABLE ADDRESS "PEPHIL PHILADELPHIA"
TELECOPIER (#488) 215-732-8088 · (#3800) 215-988-0884
DEX (#3800) 215-546-3477 · TWX 710-670-0777

606 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
914-694-4500

WRITER'S DIRECT DIAL NUMBER
(215) 893-3995

May 8, 1984

9 P2:30

8504053402

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.

Attachment 1
Page 4

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

8504305410

Attachment!
Page 5

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

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

8504050541

Attachment 1
Page 1

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

Mr. Vincent H. Cohen, Esquire
Ms. Dianne O'Hara, Esquire
Hogan & Hartson
815 Connecticut Avenue, N.W.
Suite 500
Washington, DC 20006-4072

Re: MUR 1667
Mondale Delegates--D.C.
Committee

Dear Mr. Cohen and Ms. O'Hara:

This letter is in response to your request for an extension of time in which to file a response to the complaint and its supplements in the above-captioned matter. The Commission has considered your request and voted not to grant the extension. Your response is, therefore, due to the Commission no later than May 14, 1984.

Should you have any additional questions, please contact Stephen H. Mims, the attorney assigned to this matter at (202)523-4143.

Sincerely,

Charles N. Steele
General Counsel

8504005412

Attachment 2
Page 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Mr. Thomas D. Barr, Esquire
Ms. Ellen S. Oran, Esquire
One Chase Manhattan Plaza
New York, NY 10005

Re: MUR 1667
New York At-Large
Delegates for Mondale
Committee

Dear Mr. Barr and Ms. Oran:

This letter is in response to your request for an extension of time in which to file a response to the complaint and its supplements in the above-captioned matter. The Commission has considered your request and voted not to grant the extension. Your response is, therefore, due to the Commission no later than May 14, 1984.

Should you have any additional questions, please contact Stephen H. Mims, the attorney assigned to this matter at (202)523-4143.

Sincerely,

Charles N. Steele
General Counsel

8504050541 3

Attachment 2
Page 2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Peter Hearn, Esquire
James M. Beck, Esquire
Pepper, Hamilton & Sheetz
2001 The Fidelity Building
123 South Broad Street
Philadelphia, PA 19103

Re: MUR 1667
Mondale At-Large
Delegates Committee

Dear Messrs. Hearn and Beck:

This letter is in response to your request for an extension of time in which to file a response to the complaint and its supplements in the above-captioned matter. The Commission has considered your request and voted not to grant the extension. Your response is, therefore, due to the Commission no later than May 14, 1984.

Should you have any additional questions, please contact Stephen H. Mims, the attorney assigned to this matter at (202)523-4143.

Sincerely,

Charles N. Steele
General Counsel

8504005541

Attachment 2
Page 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1984

David M. Ifshin, Esquire
Carolyn U. Oliphant, Esquire
Mondale for President Committee, Inc.
2201 Wisconsin Avenue
Suite 100
Washington, D.C. 20007

MUR 1667

Dear Mr. Ifshin and Ms. Oliphant:

On May 10, 1984, you were advised by letter that the Commission would forward to you a list of the names of the Mondale delegate committees that had received a copy of the complaint and the supplements in the above-captioned matter. A copy of a list of those delegate committees is enclosed.

Should you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202)523-4143.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

Enclosure

8504055041

Notifications Mailed on April 26, 1984

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

William H. Simon, Treasurer
Mondale Delegates--D.C. Committee
1917 Randolph Street, N.E.
Washington, DC 20018

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

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

8504050541 6

Notifications Mailed on May 4, 1984

Nancy Ryan, Treasurer
New Hampshire First District
Delegates For Mondale
5 Haines
Merrimack, NH 03054

Anthony Redington, Treasurer
New Hampshire Second District
Delegates For Mondale
4 Neil Drive
Allenstown, NH 03275

Kansas At-Large Delegate
Committee
c/o Terry Scanlon
715 W. Tenth Street
Topeka, KS 66612

Blake Wordal, Treasurer
Montana At-Large Delegates
For Mondale Committee
846 E. Sixth Avenue
Helena, MT 59601

Larry D. Owen, Treasurer
Sixth District Delegates
For Mondale Committee
1019 Huntington
East Lansing, MI 48823

Kevin D. O'Connor, Treasurer
Fifth District Mondale
Delegate Committee
538 N32
Milwaukee, WI 53208

Patrick C. Brumleve, Treasurer
22nd Congressional District
Delegates For Mondale
P.O. Box 111
Cobden, Illinois 60451

Terrie L. Hanus, Treasurer
Fourth District Mondale
Delegate Committee
1210 Timber Place, Apt 1B
New Lenox, Illinois 60451

8504054117

Nicholas Spaeth, Treasurer
North Dakota Delegates For
Mondale Committee
70 N 5
Fargo, North Dakota 58107

Ralph Coldiron, Treasurer
Kentucky At-Large Delegates
For Mondale Committee
1513 Pinemeadow Drive
Lexington, Kentucky 40504

8504050541 9

Notifications Mailed on May 11, 1984

David J. Cantelme, Treasurer
Arizona Mondale Delegate
Committee
826 N. Central Avenue
Phoenix, AZ 85003

Janet Epstein, Treasurer
11th Congressional District
Mondale Delegate Committee
520 S. El Camino Real
Suite 520
San Mateo, CA 94402

Ray Castell-Blanch, Treasurer
Mondale Delegate Election
Committee - 6th C D
1518 5th Avenue
San Rafael, CA 94901

Howard A. Roitman, Treasurer
Mondale Colorado Delegate
Selection Committee Statewide
2225 Birch Street
Denver, CO 80207

Susan K. Sweeney, Treasurer
37th Congressional District
Delegate Advisory Committee
1766 Camino Parocela
Palm Springs, CA 92262

Leon Shull, Treasurer
ADA Campaign Committee
1411 K. Street, N.W.
Washington, D.C. 20005

George E. Comerford, Treasurer
14th C D For Mondale
5844 Western Way
Lake Worth, FL 33463

J. Gordon Pennington, Treasurer
C D #1 Delegates For Mondale
7830 North Palafox Street
Pensacola, FL 35214

Jo Anna Conte, Treasurer
C D 2 Delegates For Mondale,
Florida
P.O. Box 10403
Tallahassee, FL 32302

Calvin D. DeVoney, Treasurer
Congressional District 4
Delegates For Mondale
P.O. Box 668, 3141 Howland Blvd.
Orange City, FL 32763

Bernard E. Shingle, Treasurer
Congressional District #10
Delegates For Mondale
5520 2nd Avenue DR West
Bradenton, FL 33529

Cheryl B. Frazier, Treasurer
Congressional District 5
Delegates For Mondale
1310 West Colonial Drive
Suite 29
Orlando, FL 32804

James L. Ghiotto, Treasurer
Congressional District 7
Delegates For Mondale
2925 Alline Avenue
Tampa, FL 33611

LaVaunne Miller, Treasurer
Congressional District 9
Delegates For Mondale
24 Meadow Lark Lane
Land O'Lakes, FL 33539

Samuel C. Catherwood, Treasurer
Delegates For Mondale
P.O. Box 8796
1100 Cesery Blvd
Jacksonville, FL 32211

Robert D. Parks, Treasurer
Mondale 15th District
Delegate Committee
440 S. Andrews Avenue
Ft Lauderdale, FL 33301

Angelique O. Stahl, Treausrer
Mondale 16th District Delegate
Committee
11621 N W 23rd Street
Pembroke Pines, FL 33026

Sue Moore, Treasurer
Mondale Delegates
Congressional
District #8
94 Baywood Avenue
Clearwater, FL 33575

Melinda Greiner, Treasurer
Mondale Delegates, Congressional
District #13
1625 Winkler Avenue
Ft. Myers, FL 33901

Nancy Miller, Treasurer
Northern 12th Congressional
District Delegates For
Mondale
2129 S E Holland Street
Port St. Lucie, FL 33452

Robert A. Sugarman, Treasurer
South Florida Delegates For
Mondale
P.O. Drawer 520337
1951 N W 17th Avenue
Miami, FL 33152

Larry Laroco, Treasurer
Idaho Delegates For Mondale
537 W. Bannock
Suite 201
Boise, ID 83702

Elliott D. Hartstein, Treasurer
10th District Mondale Delegate
Committee
908 Providence Lane
Buffalo Grove, IL 60090

George Moser, Treasurer
12th District Mondale
Delegate Committee
2200 West Higgins Road
Hoffman Estates, IL 60195

Joan P. Murphy, Treasurer
13th Congressional District
Delegate Committee For
Walter F. Mondale
11601 South Pulaski
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Brooklyn, NY 11210

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OFFICE OF THE
COMMISSION SECRETARY

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

84 MAY 14 P 4: 28

May 14, 1984

MEMORANDUM TO: The Commission

FROM: Charles N. Steele
General Counsel

SUBJECT: MUR 1667 - Copies of Letters

Attached are letters which have been forwarded pursuant to the action taken by the Commission on May 8, 1984.

Attachment 1 is the notification of the RTB Finding which was forwarded to David M. Ifshin and Carolyn U. Oliphant on May 10, 1984;

Attachment 2 is a sample of the letter which was sent to the 116 (approximate) delegate committees together with a listing of the names and addresses of each committee to which the letter was forwarded; and

Attachment 3 is a letter which was forwarded to David M. Ifshin and Carolyn U. Oliphant notifying them of the Mondale delegate committees that have been notified in connection with this matter.

Attachments

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 10, 1984

David M. Ifshin, Esquire
Carolyn U. Oliphant, Esquire
Mondale for President Committee, Inc.
2201 Wisconsin Avenue, N.W.
Suite 100
Washington, D.C. 20007

RE: MUR 1667

Dear Mr. Ifshin and Ms. Oliphant:

The Federal Election Commission notified your clients, the Mondale for President Committee, Inc., and Michael Berman, as the treasurer of the Committee, on April 6, 1984, of a complaint alleging violations of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to your clients at that time. In addition, the Commission has received and forwarded to you, supplements to the complaint that were filed with the Commission on April 18 and 27, and May 2, 1984.

Upon further review of the allegations contained in the complaint, the supplements thereto, and information supplied by you, the Commission, on May 8, 1984, determined there is reason to believe that your clients have violated 2 U.S.C. §§ 441a(b), and 441a(f), provisions of the Act. These findings are based upon the Commission's decision to regard the Mondale delegate committees as affiliated committees of the Mondale for President Committee, Inc. Thus, it appears that the Mondale for President Committee, Inc., and Michael S. Berman, as treasurer, accepted excessive contributions in violation of 2 U.S.C. § 441a(f), and that the Mondale for President Committee, Inc., and Michael S. Berman, as treasurer, made excessive expenditures in violation of 2 U.S.C. §§ 441a(b)(1)(A) and 441a(f).

The Commission acknowledges receipt of your request for conciliation of this matter prior to a finding of probable cause and has declined to enter into pre-probable cause conciliation negotiations with you at this time. The Commission has also agreeed to notify you of the names of the Mondale delegate committees that have been named as respondents in this matter. That list will be forwarded to you under separate cover.

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.

ATTACHMENT 1

8504005434

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter, at (202) 523-4143.

Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

Enclosures
Procedures

8504050054435

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.

ATTACHMENT 2

8504050436

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

8504050554437

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Paul E. Haney, Treasurer
Haney, Mains, Rankin, Trobia,
Delegate Committee
& 3 Tacoma Street
Rochester, NY 14316

Diane M. Carr, Treasurer
[illegible] Mondale 2nd
Congressional District
P.O. Box 855
Lindenhurst, NY 11757

Craig Heller, Treasurer
Long Island Mondale 4th
C D Committee
2919 Bond Drive
Merrick, NY 11566

Jurgen Worthing, Treasurer
Long Island Mondale Committee
75 Weaving Lane
Wantagh, NY 11793

Barry M. McCoy, Treasurer
Long Island Mondale
First CD Delegates
49 Thompson Bay Path
Setauket, NY 11733

Ronald V. Iaboni, Treasurer
Lower Hudson Delegates For
Mondale
1 Fisher Drive
Mt. Vernon, NY 10552

Elizabeth Bolden, Treasurer
Mondale 17th CD Delegate
Committee
48A Hampton Place
Brooklyn, NY 11213

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Mr. Joseph Miller, Treasurer
Mondale 19th CD Delegate
Committee
100-7 Alcott Place
Bronx, NY 10475

Mary E. Gurnet, Treasurer
Naples-Mondale for President
Delegate Slate
Box 124
Clifton Park, NY 12065

Louis Nicolella, Treasurer
North Country Delegates for
Mondale
68 Third Street
Gloversville, NY 12078

[redacted] R. Donaldson, Jr., Treasurer
Northern New York Delegates for Mondale
PO Box 127
Lake Clear, NY 12945

Elizabeth Tarpey, Treasurer
Sharpe/Jackson Delegates for
Mondale
92 Hillcrest Road
Mt. Vernon, NY 10552

Janet E. Bald, Treasurer
Southern Tier for Mondale
135 1/2 North 6th Street
Olean, NY 14760

Jeffrey George, Treasurer
17th District Mondale Delegate
Committee
445 Catalina Avenue
Youngstown, OH 44504

Peter W. Swenty, Treasurer
1st and 2nd District Delegates
for Mondale
607 Terrace Hilton
15 West 6th Street
Cincinnati, OH 45202

William D. Angel, Jr., Treasurer
4th District Mondale Delegate
Committee
1424 Lowell
Lima, OH 45805

Dorothy J. Sievers, Treasurer
Cuyahoga County Mondale Delegates Committee
14018 Clifford Avenue
Cleveland, OH 44135

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Joseph M. Cognetti, Treasurer
10th Congressional District
Mondale Delegate Committee
520 Spruce Street
Scranton, PA 18503

Mae McHugh, Treasurer
11th Congressional Delegates
for Mondale
11 Bryden Street
Pittston, PA 18640

Louann Shrader, Treasurer
19th Congressional District
Delegates for Mondale Committee
RD 5 Box 259 Oakhill Drive
Hanover, PA 17331

Dolores C. Gross, Treasurer
21st Congressional District 1984
Delegates for Mondale
2807 Oakwood Street
Erie, PA 16508

Debbie O'Dell Seneca, Treasurer
22nd Congressional District
Delegate Committee for Mondale
335 North Main Street
Washington, PA 15301

Alice K. Gardan, Treasurer
3rd CD Delegates for Mondale
2707 Tolbut Street
Philadelphia, PA 19152

Elizabeth McCurdy, Treasurer
4th District Delegates for Mondale
1205 Eighth Avenue
PO Box 136
Beaver Falls, PA 15010

Nancy B. Baulis, Treasurer
7th Congressional District
Mondale Delegates
90 Barbara Road
Drexel Hill, PA 19026

Philip B. Ebersole, Treasurer
Delegate Committee for Mondale
16th Congressional District
Apartment #3
244 East Orange Street
Lancaster, PA 17602

8504548

Kathleen Neary, Treasurer
Delegates for Mondale Committee
26 West Laughead Avenue
Boothwyn, PA 19061

Joseph P. Manko, Treasurer
Mondale 13th Delegate Committee
12th Floor Packard Building
Philadelphia, PA 19102

William H. Kerr, Treasurer
Mondale Delegate Committee -
12th Congressional District
303 South Warren Avenue
Apollo, PA 15613

Thomas E.Mellon, Jr, Treasurer
Mondale Delegate Team
East Court Street
Doylestown, PA 18901

Kathleen Smith, Treasurer
Mondale Delegates - 20th District
1032 S. Braddock Avenue
Pittsburgh, PA 15218

Lawrence P. Murin, Treasurer
Mondale Delegates Committe
422 Douglass Street
Reading, PA 19601

Gerard S. Ziegler, Treasurer
Ninth Congressional District
Delegates For Mondale
3332 Broad Avenue
Altoona, PA 16601

Richard Brabender, Treasurer
PA 14th Congressional District
Delegates For Mondale
3411 Library Road
Pittsburgh, PA 15234

Art Rooney, II, Treasurer
PA 18th Congressional District
Delegates For Mondale
1 Oxford Ctr, 40th fl
Pittsburgh, PA 15219

Susan D. Carle, Treasurer
Pennsylvania 17th Congressional
District Delegates For Mondale
1037 Maclay Street
Harrisburg, PA 17103

Anthony McNeil, Treasurer
Second Congressional District
Delegates For Mondale
632 May Place
Philadelphia, PA 19139

Salvatore Mancini, Treasurer
1st District Delegate Committee
For Mondale
1910 Smith Street, Suite 9
N. Providence, RI 02911

Joseph DeLorenzo, Treasurer
2nd District Delegate Committee
For Mondale
1911 Smith Street, Suite 9
N. Providence, RI 02911

Roger Duncan, Treasurer
14th District Mondale
Delegate Committee
1407A Bridgeway
Austin, TX 78704

Millie Bruner, Treasurer
23rd District Mondale
Delegate Committee
2107 McKinney
Dallas, TX 75201

Frank Herrera, Treasurer
26th District Mondale Delegate
Committee
111 West Laurel, Suite 101
San Antonio, TX 78212

Melinda T. Vance, Treasurer
Tarrant County Delegate Committee
3901 Mockingbird Lane
Fort Worth, TX 76109

Ann M. Yarborough, Treasurer
Arlington Mondale Delegate
Committee
5140 North 37th Street
Arlington, VA 22207

8504050540

Paddi Valentine, Treasurer
Mondale 3rd District Delegate
Section Committee
Stockton Lane
Richmond, VA 23221

Meade Emory, Treasurer
At-Large Delegates For
Mondale
P.O. Box 21742
Seattle, WA 98111

8504050545 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1984

David M. Ifshin, Esquire
Carolyn U. Oliphant, Esquire
Mondale for President Committee, Inc.
2201 Wisconsin Avenue
Suite 100
Washington, D.C. 20007

MUR 1667

Dear Mr. Ifshin and Ms. Oliphant:

On May 10, 1984, you were advised by letter that the Commission would forward to you a list of the names of the Mondale delegate committees that had received a copy of the complaint and the supplements in the above-captioned matter. A copy of a list of those delegate committees is enclosed.

Should you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202)523-4143.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

Enclosure

8504050452

ATTACHMENT 3

Notifications Mailed on April 26, 1984

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

William H. Simon, Treasurer
Mondale Delegates--D.C. Committee
1917 Randolph Street, N.E.
Washington, DC 20018

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

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

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Notifications Mailed on May 4, 1984

Nancy Ryan, Treasurer
New Hampshire First District
Delegates For Mondale
5 Haines
Merrimack, NH 03054

Anthony Redington, Treasurer
New Hampshire Second District
Delegates For Mondale
4 Neil Drive
Allenstown, NH 03275

Kansas At-Large Delegate
Committee
c/o Terry Scanlon
715 W. Tenth Street
Topeka, KS 66612

Blake Wordal, Treasurer
Montana At-Large Delegates
For Mondale Committee
846 E. Sixth Avenue
Helena, MT 59601

Larry D. Owen, Treasurer
Sixth District Delegates
For Mondale Committee
1019 Huntington
East Lansing, MI 48823

Kevin D. O'Connor, Treasurer
Fifth District Mondale
Delegate Committee
538 N32
Milwaukee, WI 53208

Patrick C. Brumleve, Treasurer
22nd Congressional District
Delegates For Mondale
P.O. Box 111
Cobden, Illinois 60451

Terrie L. Hanus, Treasurer
Fourth District Mondale
Delegate Committee
1210 Timber Place, Apt 1B
New Lenox, Illinois 60451

8504054 1

Nicholas Spaeth, Treasurer
North Dakota Delegates For
Mondale Committee
70 N 5
Fargo, North Dakota 58107

Ralph Coldiron, Treasurer
Kentucky At-Large Delegates
For Mondale Committee
1513 Pinemeadow Drive
Lexington, Kentucky 40504

8504050455

Notifications Mailed on May 11, 1984

David J. Cantelme, Treasurer
Arizona Mondale Delegate
Committee
826 N. Central Avenue
Phoenix, AZ 85003

Janet Epstein, Treasurer
11th Congressional District
Mondale Delegate Committee
520 S. El Camino Real
Suite 520
San Mateo, CA 94402

Ray Castell-Blanch, Treasurer
Mondale Delegate Election
Committee - 6th C D
1518 5th Avenue
San Rafael, CA 94901

Howard A. Roitman, Treasurer
Mondale Colorado Delegate
Selection Committee Statewide
2225 Birch Street
Denver, CO 80207

Susan K. Sweeney, Treasurer
37th Congressional District
Delegate Advisory Committee
1766 Camino Parocela
Palm Springs, CA 92262

Leon Shull, Treasurer
ADA Campaign Committee
1411 K. Street, N.W.
Washington, D.C. 20005

George E. Comerford, Treasurer
14th C D For Mondale
5844 Western Way
Lake Worth, FL 33463

J. Gordon Pennington, Treasurer
C D #1 Delegates For Mondale
7830 North Palafox Street
Pensacola, FL 35214

Jo Anna Conte, Treasurer
C D 2 Delegates For Mondale,
Florida
P.O. Box 10403
Tallahassee, FL 32302

8504056

Calvin D. DeVoney, Treasurer
Congressional District 4
Delegates For Mondale
P.O. Box 668, 3141 Howland Blvd.
Orange City, FL 32763

Bernard E. Shingle, Treasurer
Congressional District #10
Delegates For Mondale
5520 2nd Avenue DR West
Bradenton, FL 33529

Cheryl B. Frazier, Treasurer
Congressional District 5
Delegates For Mondale
1310 West Colonial Drive
Suite 29
Orlando, FL 32804

James L. Ghiotto, Treasurer
Congressional District 7
Delegates For Mondale
2925 Alline Avenue
Tampa, FL 33611

LaVaunne Miller, Treasurer
Congressional District 9
Delegates For Mondale
24 Meadow Lark Lane
Land O'Lakes, FL 33539

Samuel C. Catherwood, Treasurer
Delegates For Mondale
P.O. Box 8796
1100 Cesery Blvd
Jacksonville, FL 32211

Robert D. Parks, Treasurer
Mondale 15th District
Delegate Committee
440 S. Andrews Avenue
Ft Lauderdale, FL 33301

Angelique O. Stahl, Treausrer
Mondale 16th District Delegate
Committee
11621 N W 23rd Street
Pembroke Pines, FL 33026

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Sue Moore, Treasurer
Mondale Delegates
Congressional
District #8
94 Baywood Avenue
Clearwater, FL 33575

Melinda Greiner, Treasurer
Mondale Delegates, Congressional
District #13
1625 Winkler Avenue
Ft. Myers, FL 33901

Nancy Miller, Treasurer
Northern 12th Congressional
District Delegates For
Mondale
2129 S E Holland Street
Port St. Lucie, FL 33452

Robert A. Sugarman, Treasurer
South Florida Delegates For
Mondale
P.O. Drawer 520337
1951 N W 17th Avenue
Miami, FL 33152

Larry Laroco, Treasurer
Idaho Delegates For Mondale
537 W. Bannock
Suite 201
Boise, ID 83702

Elliott D. Hartstein, Treasurer
10th District Mondale Delegate
Committee
908 Providence Lane
Buffalo Grove, IL 60090

George Moser, Treasurer
12th District Mondale
Delegate Committee
2200 West Higgins Road
Hoffman Estates, IL 60195

Joan P. Murphy, Treasurer
13th Congressional District
Delegate Committee For
Walter F. Mondale
11601 South Pulaski
Alsip, IL 60658

Jerome C. Shapiro, Treasurer
14th District Delegates For
Mondale
7 Pheasant Run
Dekalb, IL 60115

Herman L. Dammerman, Treasurer
15th District Delegates For
Mondale
1407 Hanson Drive
Normal, IL 61761

Frank G. Mabrey, Treasurer
16th Delegates For Mondale
1130 North Main
Rockford, IL 61103

Donna M. McWilliams, Treasurer
17th District Mondale Delegate
Committee
400 Rock Island Bank Building
P.O. Box 428
Rock Island, IL 61201

John S. Adkins, Treasurer
19th District Delegates
For Mondale Committee
2431 E. Harrison
Charleston, IL 61920

Georgia E. Trevan, Treasurer
1st Congressional District
Delegates For Walter Mondale
9401 South Michigan Avenue
Chicago, IL 60619

Bill Dempsey, Treasurer
20th C D Delegates For Mondale
P.O. Box 23
Forsyth, IL 62535

William H. Taylor, II, Treasurer
7th Congressional District Delegates
For Mondale
One IBM Plaza
Suite 4700
Chicago, IL 60611

Betty Donovan, Treasurer
Delegates For Modale Committee
21st Congressional District
8A Potomac Drive
Fairview Heights, IL 62208

8504050459

Roman Lobodzinski, Treasurer
Eighth District Mondale Delegate
Committee
3055 N. Milwaukee
Chicago, IL 60618

Jean M. Foran, Treausrer
Eleventh District Mondale
Delegate Committee
6156 N. Knox
Chicago, IL 60646

James K. Polk, Treasurer
Mondale Delegates For the
Illinois 18th Committee
901 W. Brons
Peoria, IL 61604

Gregory A. Kinczewski, Treasurer
Ninth District Mondale Delegate
Committee
1226 N. Greenleaf
Evanston, IL 60202

Sheila A. Rivers, Treasurer
Second Congressional
District Delegates
For Mondale
11151 S. King Drive
Chicago, IL 60628

Jack L. Bright, Treasurer
Sixth District Mondale
Delegate Committee
478 Washington Street
Elmhurst, IL 60126

Lenore T. Colson, Treasurer
Third Congressional District
Delegates For Mondale
4312 West 107th Drive
Oak Lawn, IN 60453

Dan Watkins, Treasurer
Kansas Mondale At-Large
Delegate Committee
1645 Barker
Lawrence, KS 66044

Ellen O. Moyer, Treasurer
4th District Delegates
For Mondale
44 Madison Place
Annapolis, MD 21401

8504050460

James M. Voss, Treasurer
First District Delegates
For Mondale
RD 1 Box 183
Denton, MD 21629

Lawrence M. Vincent, Treasurer
Mondale Delegate At-Large
Committee For MD
16 East Lombard Street-310 MD
Baltimore, MD 21202

Otto Unsinn, Treasurer
Montgomery County For
Mondale Delegate Committee
51 Monroe Street
Suite 1406
Rockville, MD 20850

Barbara Levin, Treasurer
Prince George's Delegates
For Mondale
3505 Burleigh Drive
Mitchellville, MD 20716

Joan Sanders Rudolph, Treasurer
Second District Delegates For Mondale
7119 Heathfield Road
Baltimore, MD 21212

Alma Bell, Treasurer
Seventh District Delegates
For Mondale
538 W.Lafayette
Baltimore, MD 21217

Thomas G. Slater, Treasurer
Sixth District Delegates For Mondale
198 Thomas Johnson Drive #10
Frederick, MD 21701

Frank Lidinsky, Treasurer
Third District Delegates For Mondale
1035 S. Charles Street
Baltimore, MD 21230

Patricia Tallmadge, Treasurer
15th District Delegates For
Mondale Committee
34451 Harroun
Wayne, MI 48184

Marsha Murphy, Treasurer
Western Missouri Mondale
Delegates Committee
220 West Armour Boulevard
Kansas City, MO 64111

Helen Russell Allegrone, Treasurer
Guilford Delegates For Mondale
1803 Rolling Road
Greensboro, NC 27403

Heyward Davenport, Treasurer
16th C D Delegates For Mondale
1270 Fifth Avenue - 2R
New York, NY 10029

Stephen J.Wing, Treasurer
21st District Friends Of
Walter Mondale Delegates
94 Market Street
P.O. Box 910
Poughkeepsie, NY 12602Mr. Wing

Kevin Thompson, Treasurer
22nd Congressional District
Delegates For Mondale
130 North Main Street
New City, NY 10956Mr. Thompson

Ruben S. Gersowitz, Treasurer
23rd Congressional District
Delegates For Walter F. Mondale
11 North Pearl Street, Rm 1608
Albany, NY 12207Mr. Gersowitz

John E. McAuliffe, Treasurer
27th Congressional District
Delegates For Mondale
236 Erie Boulevard East
Syracuse, NY 13202Mr. McAuliffe

8504054620

Evelyn L. Rockas, Treasurer
28th Congressional District
Delegates For Mondale Committee
P.O. Box 61
Ithaca, NY 14851

Paul Gross, Treasurer
6th C D Delegates For
Mondale
92-03 Rockaway Beach Blvd
Rockaway Beach, NY 11693

Charlotte K. Scheman, Treasurer
7th C D Delegates For Mondale
143-53 Hoover Avenue
Briarwood, NY 11435

Benjamin Chevat, Treasurer
8th C D Delegates For Mondale
64-48 223rd Place
Bayside, NY 11364

Gerard J. Sweeney, Treasurer
9th C D Delegates For Mondale
120-10 Queens Blvd.
New Gardens, NY 11415

Thomas A. Fink, Treasurer
Committee For Western New York
Mondale Delegates
Suite 900
First Federal Plaza
Rochester, NY 14614

Lawrence Rosenweiz, Treasurer
Delegates For Mondale - Kings/
Richmond 11th C D
274 Lafayette Avenue
Brooklyn, NY 11238

Barbara Capon, Treasurer
Delegates For Mondale 13th
C D Kings/Richmond
2940 Ocean Parkway
Brooklyn, NY 11235

Francis J. Kloster, Treasurer
Delegates For Mondale 25th District
1 Hartford Terrace
New Hartford, NY 13413

Mary Ellen Hunold, Treasurer
Delegates For Mondale-King/
Richmond 14th C D
157 Prescott Avenue
Staten Island, NY 10306

William Steinman, Treasurer
Delegates For Mondale 12th
C D Kings/Richmond
2044 E: 18th Street
Brooklyn, NY 11229

Kenneth C. Kruly, Treasurer
Erie County Delegates For Mondale
220 Delaware Avenue
Buffalo, NY 14202

Paul E. Haney, Treasurer
Haney, Mains, Rankin, Trobia,
Delegate Committee
& 3 Tacoma Street
Rochester, NY 14316

Diane M. Carr, Treasurer
L I - Mondale 2nd
Congressional District
P.O. Box 555
Lindenhurst, NY 11757

Craig Heller, Treasurer
Long Island Mondale 4th
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2919 Bond Drive
Merrick, NY 11566

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Long Island Mondale Committee
75 Weaving Lane
Wantagh, NY 11793

Barry M. McCoy, Treasurer
Long Island Mondale
First CD Delegates
49 Thompson Bay Path
Setauket, NY 11733

Ronald V. Iaboni, Treasurer
Lower Hudson Delegates For
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Mt. Vernon, NY 10552

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Mondale 17th CD Delegate
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Brooklyn, NY 11213

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Mondale 19th CD Delegate
Committee
100-7 Alcott Place
Bronx, NY 10475

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Naples-Mondale for President
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Box 124
Clifton Park, NY 12065

Louis Nicolella, Treasurer
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Mondale
68 Third Street
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Clifton R. Donaldson, Jr., Treasurer
Northern New York Delegates for Mondale
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Lake Clear, NY 12945

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135 1/2 North 6th Street
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1st and 2nd District Delegates
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15 West 6th Street
Cincinnati, OH 45202

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Dorothy J. Sievers, Treasurer
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Joseph M. Cognetti, Treasurer
10th Congressional District
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Mae McHugh, Treasurer
11th Congressional Delegates
for Mondale
11 Bryden Street
Pittston, PA 18640

Louann Shrader, Treasurer
19th Congressional District
Delegates for Mondale Committee
RD 5 Box 259 Oakhill Drive
Hanover, PA 17331

Dolores C. Bross, Treasurer
21st Congressional District 1984
Delegates for Mondale
2807 Oakwood Street
Erie, PA 16508

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22nd Congressional District
Delegate Committee for Mondale
335 North Main Street
Washington, PA 15301

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3rd CD Delegates for Mondale
2707 Tolbut Street
Philadelphia, PA 19152

Elizabeth McCurdy, Treasurer
4th District Delegates for Mondale
1205 Eighth Avenue
PO Box 136
Beaver Falls, PA 15010

Nancy B. Baulis, Treasurer
7th Congressional District
Mondale Delegates
90 Barbara Road
Drexel Hill, PA 19026

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Apartment #3
244 East Orange Street
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Delegates for Mondale Committee
28 West Laughead Avenue
Boothwyn, PA 19061

Joseph P. Manko, Treasurer
Mondale 13th Delegate Committee
12th Floor Packard Building
Philadelphia, PA 19102

William H. Kerr, Treasurer
Mondale Delegate Committee -
12th Congressional District
303 South Warren Avenue
Apollo, PA 15613

Thomas E.Mellon, Jr, Treasurer
Mondale Delegate Team
East Court Street
Doylestown, PA 18901

Kathleen Smith, Treasurer
Mondale Delegates - 20th District
1032 S. Braddock Avenue
Pittsburgh, PA 15218

Lawrence P. Murin, Treasurer
Mondale Delegates Committe
422 Douglass Street
Reading, PA 19601

Gerard S. Ziegler, Treasurer
Ninth Congressional District
Delegates For Mondale
3332 Broad Avenue
Altoona, PA 16601

Richard Brabender, Treasurer
PA 14th Congressional District
Delegates For Mondale
3411 Library Road
Pittsburgh, PA 15234

Art Rooney, II, Treasurer
PA 18th Congressional District
Delegates For Mondale
1 Oxford Ctr, 40th fl
Pittsburgh, PA 15219

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Susan D. Carle, Treasurer
Pennsylvania 17th Congressional
District Delegates For Mondale
1037 Maclay Street
Harrisburg, PA 17103

Anthony McNeil, Treasurer
Second Congressional District
Delegates For Mondale
632 May Place
Philadelphia, PA 19139

Salvatore Mancini, Treasurer
1st District Delegate Committee
For Mondale
1910 Smith Street, Suite 9
N. Providence, RI 02911

Joseph DeLorenzo, Treasurer
2nd District Delegate Committee
For Mondale
1910 Smith Street, Suite 9
N. Providence, RI 02911

Roger Duncan, Treasurer
14th District Mondale
Delegate Committee
1407A Bridgeway
Austin, TX 78704

Millie Bruner, Treasurer
23rd District Mondale
Delegate Committee
2107 McKinney
Dallas, TX 75201

Frank Herrera, Treasurer
26th District Mondale Delegate
Committee
111 West Laurel, Suite 101
San Antonio, TX 78212

Melinda T. Vance, Treasurer
Tarrant County Delegate Committee
3901 Mockingbird Lane
Fort Worth, TX 76109

Ann M. Yarborough, Treasurer
Arlington Mondale Delegate
Committee
5140 North 37th Street
Arlington, VA 22207

Paddi Valentine, Treasurer
Mondale 3rd District Delegate
Section Committee
Stockton Lane
Richmond, VA 23221

Meade Emory, Treasurer
At-Large Delegates For
Mondale
P.O. Box 21742
Seattle, WA 98111

Steven D. Goldenkranz
10th C.D. Delegates for Mondale
1551 East 23rd Street
Brooklyn, NY 11210

8504050546 2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 10, 1984

David M. Ifshin, Esquire
Carolyn U. Oliphant, Esquire
Mondale for President Committee, Inc.
2201 Wisconsin Avenue, N.W.
Suite 100
Washington, D.C. 20007

RE: MUR 1667

Dear Mr. Ifshin and Ms. Oliphant:

The Federal Election Commission notified your clients, the Mondale for President Committee, Inc., and Michael Berman, as the treasurer of the Committee, on April 6, 1984, of a complaint alleging violations of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to your clients at that time. In addition, the Commission has received and forwarded to you, supplements to the complaint that were filed with the Commission on April 18 and 27, and May 2, 1984.

Upon further review of the allegations contained in the complaint, the supplements thereto, and information supplied by you, the Commission, on May 8, 1984, determined there is reason to believe that your clients have violated 2 U.S.C. §§ 441a(b), and 441a(f), provisions of the Act. These findings are based upon the Commission's decision to regard the Mondale delegate committees as affiliated committees of the Mondale for President Committee, Inc. Thus, it appears that the Mondale for President Committee, Inc., and Michael S. Berman, as treasurer, accepted excessive contributions in violation of 2 U.S.C. § 441a(f), and that the Mondale for President Committee, Inc., and Michael S. Berman, as treasurer, made excessive expenditures in violation of 2 U.S.C. §§ 441a(b)(1)(A) and 441a(f).

The Commission acknowledges receipt of your request for conciliation of this matter prior to a finding of probable cause and has declined to enter into pre-probable cause conciliation negotiations with you at this time. The Commission has also agreeed to notify you of the names of the Mondale delegate committees that have been named as respondents in this matter. That list will be forwarded to you under separate cover.

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.

8504055470

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter, at (202) 523-4143.

Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

Enclosures
Procedures

8504050547

BEFORE THE FEDERAL ELECTION COMMISSION

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

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on May 8, 1984, do hereby certify that the Commission took the following actions in MUR 1667:

1. Decided by a vote of 6-0 to find reason to believe that the Mondale for President Committee, Inc. and Michael S. Berman, as treasurer, accepted excessive contributions in violation of 2 U.S.C. § 441a(f).

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

2. Decided by a vote of 5-1 to find reason to believe that the Mondale for President Committee, Inc. and Michael S. Berman, as treasurer, made excessive expenditures in violation of 2 U.S.C. §§ 441a(b)(1)(A) and 441a(f).

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

(Continued)

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3. Decided by a vote of 6-0 to decline to enter into pre-probable cause conciliation negotiations with Mondale for President Committee, Inc. and Michael S. Berman, as treasurer, at this time.

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

4. Decided by a vote of 4-2 to send the original complaint and all the supplemental materials filed by the complainant, together with covering letter, to all of the Mondale delegate committees registered with the Commission as of May 8, 1984, not previously sent this notification.

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

5. Decided by a vote of 6-0 to

   a) Take no action at this time with respect to the allegation that the delegate committees accepted contributions in violation of 2 U.S.C. §§ 44la(a) and 44la(f).

   b) Take no action at this time with respect to the allegation that the delegate committees made, and the Mondale for President Committee, Inc. and Michael S. Berman, as treasurer, received excessive contributions to the Mondale for President Committee, Inc. in violation of 2 U.S.C. § 44la(f).

   c) Take no action at this time with respect to the allegation that contributors to delegate committees and to the Mondale for President Committee, Inc. made excessive contributions, based on the operation of 11 C.F.R. § 110.1(h), in violation of 2 U.S.C. § 44la.

(Continued)

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5. (Continued)

d) Take no action at this time with respect to the allegation that some of the delegate committees have failed to register and/or timely report in violation of 2 U.S.C. §§ 433(a) and 434(a).

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

6. Decided by a vote of 6-0 to direct the General Counsel to send an appropriate letter to the Mondale for President Committee, Inc. pursuant to the actions taken this date in MUR 1667.

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

7. Decided by a vote of 6-0 to authorize the General Counsel to orally notify the Mondale for President Committee, Inc. of the actions taken this date, and subsequently notify the Committee in writing.

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

8. Decided by a vote of 6-0 to authorize the General Counsel to notify the Mondale for President Committee, Inc. of what delegate committees are being noticed under MUR 1667.

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

Attest:

5-9-84
Date

Marjorie W. Emmons
Secretary of the Commission

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RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

84 MAY 7 AM: 14

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

FIRST GENERAL COUNSEL'S REPORT

Submitted Late

Date and Time of Transmittal
By OGC to the Commission 5/7/84 - 11:15

EXECUTIVE SESSION

MAY 8 1984

MUR # 1667
Date Complaint
Received By OGC 4/6/84
Date of Notification to
Respondents 4/6/84;
4/18/84; 4/27/84;
5/2/84
Staff Members
Lerner/Propper
Mims/Bernstein

COMPLAINANT'S NAME: Americans with Hart, Inc.

RESPONDENTS' NAMES:
Mondale for President Committee, Inc.
Michael S. Berman, as Treasurer
Wisconsin At-Large Delegates Committee
At-Large Delegates Committee (PA)
New York At-Large Delegates Committee
Mondale Delegates Committee -- D.C.
New Hampshire 1st District Delegates for Mondale
New Hampshire 2nd District Delegates for Mondale
Kentucky At-Large Delegates for Mondale Committee
Montana At-Large Delegates for Mondale Committee
North Dakota Delegates for Mondale Committee
Sixth District Delegates for Mondale Committee (MI)
Kansas Mondale At-Large Committee
Fifth Congressional District Mondale Delegates Committee (WI)
22nd Congressional District Delegates for Mondale (IL)
Fourth District Mondale Delegate Committee (IL)

INTERNAL REPORTS CHECKED: All Mondale Delegate Committee reports filed as of April 26, 1984;
Mondale for President Committee, Inc. March monthly report

FEDERAL AGENCIES CHECKED: None

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SUMMARY OF ALLEGATIONS

On April 6, 1984, Americans with Hart, Inc. ("Complainant") filed a complaint with the Commission alleging violations of the Act and Regulations by the Mondale for President Committee, Inc., Michael S. Berman, as treasurer, and the Mondale delegate committees.1/ Specifically, complainant alleges that the delegate committees established for the purpose of affecting the election of delegates supporting Walter Mondale violated the contribution limits of 2 U.S.C. § 441a(a) and that expenditures by these delegate committees should be charged to the Mondale campaign's expenditure limitations under 2 U.S.C. § 441a(b).2/

The complaint relies on numerous comments reported in the newspaper media attributed to key Mondale campaign personnel as the basis for its assertions.3/ Complainant advances four theories in support of its allegations:

1/ Commission records indicate that, as of May 2, 1984, 130 committees had registered as Mondale delegate committees.

2/ Supplements to the complaint were filed on April 18 and 27, 1984. The supplements provided additional evidence allegedly substantiating the contentions contained in the original complaint. For purposes of this report no distinction is made between the complaint and those supplements. An additional supplement, filed on May 2, 1984, has not been analyzed in this report because of the time constraints involved.

3/ Concomitant with this office's consideration of the complaint, a preliminary review of reports filed by Mondale for President and various delegate committees was conducted. Because of the large numbers of delegate committee reports on file and the volume of entries contained within the Mondale committee's reports, a more in-depth review cross-referencing the reports will entail substantial continuing efforts. It is this Office's understanding that the Reports Analysis Division has also not yet completed a review of these reports.

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1) All the delegate committees are affiliated with the Mondale Campaign.

If this theory is borne out all expenditures made by the delegate committees would count against the Mondale Committee expenditure limits and all contributions received by the delegate committees would count as contributions to the Mondale Campaign.

2) All of the delegate committees are affiliated with one another.

If this is so, all of the delegate committees would be considered to be one committee and, therefore, all contributions received would be aggregated for purposes of the contribution limitations and all contributions made would be subject to a shared limitation.

3) The "coattails" exemption does not apply to expenditures made by the Mondale delegate committees.4/

(a) The coattails provision does not apply to expenditures by delegate committees.

(b) Even if the coattails provision applies to delegate committees, the expenditures involved here for campaign materials purchased by the delegate committees do not qualify for the coattails exemption because they were not made to advocate the selection of delegates.

(c) Even if the coattails provision applies to delegate committees, the expenditures involved here do not qualify for the coattails exemption because they were not in connection with volunteer activities.

(d) Even if the coattails provision applies to delegate committees, the expenditures involved in this case do not qualify for the

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4/ This argument need only be considered if the Commission finds that there is no reason to believe that the delegate committees are affiliated with the Mondale Campaign.

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coattails exemption because of the degree of coordination between the Mondale campaign and the delegate committees.

If any of these theories are supported by the evidence, the expenditures made by the delegate committees for communications advocating Walter Mondale may be in-kind contributions to the Mondale campaign and may also be charged against the candidate's expenditure limits.

4) Contributors to the delegate committees have violated the contribution limits through the operation of 11 C.F.R. § 110.1(h).

(a) Contributors to the delegate committees knew that the committees would use the funds substantially for the purpose of advocating Mondale's nomination.

(b) The delegate committees are single candidate committees because all their expenditures were made solely for the purpose of advocating Mondale's nomination.

If either of these assertions is true, contributors may have violated the contribution limits.

5) Some Mondale delegate committees have either not filed required reports or have filed such reports out of time.

If this is so, the committees involved have violated the filing requirements of the Act.

On April 30, 1984, the Mondale for President Committee, Inc. filed its response to Complainant's allegations. In his cover letter, counsel for Respondents expressed his view that there is no reason to believe that a violation of the Act has occurred. Nevertheless, counsel stated that, "for purposes of resolving this matter [ ] the Committee would voluntarily treat Mondale

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delegate committees as though they were affiliated with the Committee." On that basis, the committee requested informal conciliation pursuant to 11 C.F.R. § 111.18(d).

FACTUAL AND LEGAL ANALYSIS

I. JURISDICTIONAL QUESTIONS

In addition to their substantive response, Respondents have put forth jurisdictional arguments.5/ Respondents argue that the numerous newspaper articles appended to Complainant's submissions "do not provide a sufficient basis for consideration as evidence in a Commission enforcement action." Response at note 19. However, prior to a reason to believe finding, the Commission relies on a Complainant's sworn statement of allegations, and does not investigate or otherwise take steps to determine the credibility of the allegations. Therefore, Respondents' argument that the articles should not be considered as evidence is relevant only as a challenge to the sufficiency of the facts supporting the complaint.

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5/ In a footnote, Respondents question whether the Commission has jurisdiction to regulate delegate committees in light of the court decisions that held the Commission had no jurisdiction to regulate draft committees. FEC v. Machinists Non-Partisan Political League, 655 F.2d 380 (D.C. Cir.), cert. denied, 454 U.S. 897 (1981); FEC v. Florida for Kennedy Committee, 681 F.2d 1281 (11th Cir. 1982). The courts rested their decision on the fact that draft committee activities are not related to those of a candidate. In the case of delegates and delegate committees, on the other hand, delegates themselves are seeking selection as part of the nomination process and they are supporting an individual who meets the Act's definition of candidate. Consequently, Respondent's reliance on these two cases is misapplied.

The Act provides that "[a]ny person who believes a violation" has occurred may file a complaint, which must be signed, sworn to by the person filing, and made subject to the criminal false statement statute at 18 U.S.C. § 1001. The regulation further provides that the complaint "should conform" to additional requirements, including identification of the source of information where a statement is not made upon personal knowledge, and also containing "a clear and concise recitation of the facts which describe a violation." 11 C.F.R. § 111.4(d).

In the November 15, 1979, Commission document cited by Respondents, the Commission approved the General Counsel's recommendation to continue its practice of accepting complaints based on newspaper articles. Agenda Document #79-299. As noted in that document, the legislative history of 2 U.S.C. § 437g(a)(1), in particular the debates in the House of Representatives, indicate that the requirement of a signed, sworn and notarized complaint stemmed from a desire to deter false accusations by requiring that complainants identify themselves and that they face prosecution for false statements. (See, e.g., remarks of Representative Rostenkowski, 122 Cong. Rec. H2542 (daily ed., Mar. 30, 1976)). "These concerns are met without further requirements for external complaints based on newspaper articles." Agenda Document #79-299, page 3. The issue of possible inaccuracies is met by the requirement that news articles used as the basis for complaints be substantive in their statements of fact.

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In summary, Agency Document #79-299 recommended that complaints based on newspaper articles be accepted

> ...so long as a complaint...satisfied 2 U.S.C. § 437g(a)(1), by including a sworn statement that the complainant believes the facts to be true as alleged, and satisfies 11 C.F.R. § 111.2 [now § 111.4], in that the news article on which the complaint is based must be substantive in its facts....

Id. at 3. (emphasis added).

Respondents assert that the stories involved here "contain speculative, conclusory or innocuous quotes" which are insufficient, and that those which are substantive, i.e. constitute a violation, are "inaccurate." Here, the facts alleged in the news articles are substantive. Particular persons are named and particular acts and violations of the Act are alleged to have taken place. Therefore, the present complaint meets the Commission's criteria. Whether the facts in the articles are inaccurate will only be determined upon the Commission's investigation of the matter, and not evaluated at this stage of the proceeding.

II. AFFILIATION

The Act contains an anti-proliferation provision which reads, in part:

> For purposes of the limitations provided [in § 441a(a)(1) and (a)(2)], all contributions made by political committees established or financed or maintained or controlled by any corporation, labor organization, or any other person, including any parent, subsidiary, branch, division, department, or local unit of such corporation, labor organization, or any other person or group of such persons, shall be considered to have been made by a single political committee. . . .

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2 U.S.C. § 441a(a)(5). Committees described by this paragraph are considered to be affiliated. The purpose of this provision is to prevent circumvention of the Act's limitations by related groups of political committees. See remarks of Rep. Hays, 122 Cong. Rec. H3778 (daily ed., May 3, 1976).

The regulations set forth the types of organizations that are considered per se affiliated. 11 C.F.R. § 110.3(a)(1). The last of these, at § 110.3(a)(1)(ii)(E), states that all political committees set up by the same group of persons are treated as a single political committee. This appears to be the construct under which the allegations of the complaint, if valid, would apply. This report analyzes the four statutory criteria of affiliation (established, financed, maintained or controlled) with respect to delegate committees set up by the same group of persons. For purposes of this discussion, the evidence will be analyzed under the criteria that appeared to be most relevant, including the indicia of affiliation set forth in 11 C.F.R. § 110.3(a)(1)(iii). It is noted, however, that some of the activities alleged may also provide evidence of affiliation under other criteria.

Before embarking on a review of the application of these criteria, it is important to note that the complaint and supplements contain many broad-based allegations of affiliation, but only specifically implicate fourteen delegate committees out of an estimated 130 registered with the Commission. Consequently, only those fourteen committees were notified of the

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complaint and supplements. A review of some delegate committee reports filed subsequent to the complaint indicate that other delegate committees were involved in activities that may provide evidence of their affiliation with the Mondale campaign and/or other delegate committees.6/

Although there may be sufficient information to find reason to believe that some of these committees are affiliated with certain other committees, the record is incomplete with regard to the breadth of the apparent affiliation. Additional information may be revealed once all the delegate committee reports have been filed and reviewed, and the responses from the notified committees have been submitted.7/ Consequently, although this report analyzes the available information concerning the delegate committees, the Office of General Counsel recommends that the Commission take no action at this time with respect to the allegations concerning those committees.

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A. Affiliation of the Delegate Committees with the Mondale Campaign.

1. Establishment

Proof of the criterion of establishment generally involves a finding that the same group of persons has had a significant role in the formation of the relevant political committees. In the

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6/ Similarly, a comprehensive review of the delegate committee reports may demonstrate that there are delegate committees in addition to those specifically named who have either filed reports late or have failed to file.

7/ This office recommends that the Commission take no action with respect to those delegate committees that were notified because they were named in the complaint and/or supplements until after the expiration of the 15 day response period.

case of delegate committees, however, some contact between the campaign and the delegates is expected and often necessary. The communications with delegates frequently involve advice from the campaign regarding statutory requirements of which the delegates must be aware. The question then becomes whether these contacts go beyond this normal interchange to become evidence that supports a closer relationship such as affiliation. This section examines the evidence presented of contacts between the Mondale campaign and the delegate committees to determine if there is reason to believe that the line has been crossed.

The evidence presented in the complaint indicates that the Mondale campaign may have taken an active role in establishing the delegate committees. A memorandum dated January 12, 1984, was reportedly sent to all Mondale delegates. The memorandum, signed by Elaine Kamarck, the Mondale campaign's chief delegate coordinator, advised the delegates that they could "form committees...to raise and expend money to support their candidacies" and included "a brief outline on how these committees should work," including how to raise money.8/ The memorandum also reportedly stated that "the campaign will assist each slate of delegates in forming a committee if they so desire"9/ and advised "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."10/ Although some of the

8/ Washington Post April 14, 1984.

9/ New York Times April 26, 1984.

10/ Washington Post April 14, 1984.

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information provided in this memorandum can be viewed as simple advice to the delegates on the status of the law, the memorandum goes further and appears to urge the formation of these delegate committees to promote Mondale's own nomination by guiding them to make expenditures which principally benefit his campaign.

This evidence of establishment is corroborated by statements in the press by senior Mondale aides. Tim Finchem, campaign finance director, and David Ifshin, legal counsel, reportedly said that they had advised slates of Mondale delegates across the country how to form separate fundraising committees.11/ Mr. Mondale's campaign manager, Bob Beckel, indicated in the press that the campaign would continue to encourage the formation of delegate committees.12/

In responding to the allegations regarding establishment, Respondents claim that they had a "proper interest" in assisting the delegate committees because the Commission expressly contemplated that presidential campaigns would disseminate information to delegates regarding the regulations.13/ Respondents thereby justify the memoranda sent to delegates regarding the formation of delegate committees as mere efforts to inform delegates of the applicable law while avoiding any

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11/ Washington Post March 29, 1984.

12/ Washington Post March 20, 1984. Subsequent news reports indicate that Mondale has sought to halt the activities of the delegate committees.

13/ January 31, 1980, Meeting Tr. at 40.

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infringement of the affiliation rules. Respondents further assert that the committees were set up entirely by delegates, from the point the decision was made to form the committee through the various actions necessary to comply with the law, such as opening bank accounts and appointment of treasurers. Finally, Respondents make the argument that the reported statements of campaign officials that the campaign would continue to encourage the formation of delegate committees is not evidence of establishment, but rather is activity by the campaign in consonance with Commission policy as stated in the Explanation and Justification of the delegate regulations:" 'similar [grass roots] activity in the delegate selection process should be encouraged'". Response at 33.

Although Respondents are correct in asserting that campaigns may give limited legal advice to groups supporting their candidate, the question raised here is whether the activities of the Mondale campaign went beyond this limit. The evidence presented indicates that Respondents may have played a more active role in establishment of the delegate committees than its response indicates. Moreover, such evidence need not be restricted, as Respondents' claim, to inquiries regarding who actually opened bank accounts and the like.

Respondents' assertion that their activities were in keeping with Commission policy underlying the delegate regulations takes the quoted statement in the Explanation and Justification out of context. That statement refers to the policy behind

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incorporation of the coattails provision into the delegate selection regulations to allow dual purpose expenditures to be made in connection with volunteer activity. It does not go to the question of a candidate's establishing delegate committees to support his or her nomination.

It appears that the communications between the Mondale campaign and the delegate committees may well extend beyond bare legal advice to orchestration of a network of delegate committees to aid the campaign in furthering its own goal.

2. Financed

While "financing" in general terms refers to the flow of funds between the organizations, it does not exclude the efforts exerted by the establishing entity to arrange for contributions to be made to the other organizations. Similar patterns of contributions to the delegate committees raise questions regarding the involvement of the Mondale campaign in directing contributions to the delegate committees.

Press reports indicate that the delegate committees have already raised close to a quarter of a million dollars in funds largely donated by a few political action committees.14/ These PAC's are not limiting their contributions to the bigger at-large delegate committees. Rather, the contributions are being spread among the various Congressional district delegate committees in each state. In some instances, checks were issued by a single

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14/ Washington Post April 11, 1984.

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PAC payable to many different committees on the same day and in identical amounts.15/

In addition, New York state campaign manager William Hennessy was quoted as saying that "Mondale says he can't take any PAC money, but these delegate committees can - and they are taking PAC money. . . . They will get a lot of their money from PAC's - both unions and others."16/ This statement, along with the pattern of contributions from PACs, implies that the Mondale campaign may have directed contributors of PAC funds to the delegate committees. Moreover, the use of such funds by the delegate committees to advocate Mondale's nomination may be evidence that the delegate committees are financing the Mondale campaign.

Respondents do not refute these assertions. Instead they improperly argue that the lack of evidence of direct financing shows that the Mondale campaign has not financed the delegate committees. As stated earlier, consideration of the finance criterion is not limited to determining whether direct contributions or expenditures were made.

3. Maintained

Proof that committees are maintained in common often involves evidence that the same group of persons has provided ongoing support to those committees. Here, press reports

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15/ February 1984 Report of Receipts and Disbursements filed by UAW V - CAP at p. 1-2 for line 20(b).

16/ Washington Post March 26, 1984.

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indicate that paid Mondale campaign staff were put on the payroll of the Pennsylvania At-Large Delegate Committee after "the Mondale campaign...ran into cash difficulties after the New Hampshire primary."17/ Other delegate committees in Pennsylvania also employ former Mondale campaign staff.18/ In addition, Mondale legal counsel David Ifshin has indicated that the campaign may be providing ongoing consultation and legal advice to the delegate committees.19/

The statements of organization filed by a number of Illinois delegate committees were submitted together, accompanied by a single cover letter prepared on the Mondale campaign national headquarters stationery, signed by a member of the campaign's Illinois staff. (Attachment A) Finally, eighteen Illinois delegate committees filed financial reports on the same day in the same envelope (Attachment B).

In arguing that the delegate committees were not maintained by the Mondale committee, Respondents assert that they did not provide ongoing financial or administrative support to the delegates. Instead, the delegates maintained their own committees.

As support for their conclusion, Respondents attempt to refute the factual allegations in the complaint. For example,

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17/ Washington Post April 11, 1984; Wall Street Journal April 20, 1984.

18/ Id.

19/ Washington Post March 29, 1984.

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Respondents acknowledge that Mondale committee field people (volunteers and paid staff) became volunteers for the delegate committees, but claim, without further explanation, that that is not evidence of maintenance.

Respondents further assert that because legal advice on compliance with the Act "is specifically exempted from the definition of contribution [it] should not be used to demonstrate affiliation." Response at 30-31. Respondents undercut that argument, however, by noting that the Commission has considered the provision of such advice as evidence of affiliation. Id. at fn. 26.

Additionally, Respondents note that a volunteer attorney for the Mondale campaign reviewed the pre-election reports of the vast majority of Illinois delegate committees. These reports were then sent out, en masse, by the Mondale Chicago office. While admitting to this higher level of assistance to the delegate committees, Respondents continue to assert that such assistance is not evidence of maintenance.

By this continuing provision of support services, and the involvement of Mondale's former campaign staff in the operation of the delegate committees, it appears that the campaign may be maintaining the delegate committees.

4. Control

Evidence of control takes several forms. As noted earlier, the January 12, 1984, memorandum sent to delegates by Elaine Kamarck promotes the use of delegate committee funds for

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communications to advocate Mondale's election and explains how they should do this. Additionally, the majority of the Illinois committees reported using the same printer as the Mondale campaign even though the committees were scattered throughout the state.20/

In New York, the Mondale campaign's apparent control over the delegate committees is best illustrated by a statement of William Hennessy, state Mondale campaign manager, who was quoted as saying: "I'm doing the best I can to help 34 delegate slates and 100 or so slates and many coordinators, all in the same ballgame."21/

Further evidence of control may be demonstrated by the apparently intentional division of responsibilities between the Mondale campaign and the Pennsylvania delegate committees. Complainant cites a statement by Joseph Trippi, the Mondale campaign's Pennsylvania state campaign manager, who reportedly described the efforts of the campaign and the delegate committees as "What they [the delegate committees] are doing is essentially the politics of lining up the ward leaders.... They do the palm cards, 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."22/ Commenting on this

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20/ Washington Post March 29, 1984 and February 1984 monthly report filed by Mondale for President Committee. See also Attachment C.

21/ Washington Post March 28, 1984.

22/ Washington Post April 11, 1984.

division of labor, Mr. 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.'"23/

As to Mr. Trippi's comments, Respondents assert that the delegate committees were merely engaging in legitimate grass roots activity. Respondents state that their strategy in Pennsylvania was to focus on candidate appearances and paid advertising. If this is so, Mr. Trippi's comments imply that the delegate committees may have been apprised by the Mondale campaign of the Mondale strategy and, therefore, concentrated on other areas of campaigning.

Respondents also state that the delegate committees have prepared volunteer campaign materials in cooperation with the Mondale campaign but argue that since these materials are exempt under the regulations, coordination in their preparation cannot be used as evidence of control. Specifically, Respondents cite the previously described situation involving the coordination of printing efforts between the Mondale campaign and some Illinois delegate committees. According to the response, the committees joined together and devised a single printing format that allowed all of them to use the same printer to produce the same brochure with one panel varied to reflect information on the various delegates. Respondents claim that the only advantage gained was economic.

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23/ Id.

Although Respondents are correct that some level of coordination is acceptable in making expenditures under the coattails provision (see discussion, infra), the issue here is whether the level of coordination when combined with other factors can lead to a finding of affiliation. Thus where, as here, the coordination of printing activities provided the opportunity for Respondents to tailor the content of the delegate committee brochures (See Response at Exhibit 6), such facts may support a finding of control.

B. Affiliation Among the Delegate Committees

A separate issue from the question of affiliation between the Mondale campaign and the delegate committees is that of affiliation solely among the delegate committees. Evidence of such affiliation to date centers primarily on the criteria of establishment, maintenance and financing.

1. Established and Maintained

Similar patterns of delegate committee activity provide evidence that the committees may have been established or maintained in common. In Illinois, for example, the Complainant asserts that 16 of the state's 20 registered delegate committees filed their financial disclosure reports with the Commission on the same day in the same envelope.24/ Moreover, as noted earlier, the majority of the Illinois committees reported using

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24/ See complaint at 11-12. In fact, FEC records show that 18 of 21 Illinois delegate committees filed in this fashion. See Attachment B for a list of committees involved.

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the same printer in Chicago even though the committees were scattered throughout the state.25/

In addition, two Rhode Island delegate committees, the First and Second District Delegate Committees for Mondale, filed a single report of their combined receipts and expenditures, which stated that they were affiliated committees. (Attachment D).

2. Financed

Delegate committees in one state have transferred substantial portions of the amounts of funds left over after that state's primary to committees in states where the primary is yet to be held.

For example, reports filed with the Commission indicate that New Hampshire delegate committees transferred funds to seven Florida delegate committees, at least one Illinois committee, at least one Michigan committee and the Pennsylvania At-Large Delegate Committee. (Attachment E p. 1) Similarly, the Wisconsin At-Large Delegate Committee transferred funds to a Michigan delegate committee (Attachment E p. 5) and two Illinois committees made transfers to the Kansas At-Large Delegate Committee. (Attachment E p. 4) The Montana At-Large Delegates gave to a Florida committee and the North Dakota At-Large Delegate Committee (Attachment E p. 5), and the Kentucky At-Large Delegate Committee gave to the Montana At-Large Delegate Committee (Attachment E p. 5) Moreover, transfers of funds

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25/ Washington Post March 29, 1984. See also Attachment C for a list of committees involved. This list was completed on the basis of committee reports filed with the Commission.

between some Illinois delegate committees were reported as transfers to or from affiliated committees. (Attachment E p. 4)26/ Complainant also alleges additional transfers have occurred on an intrastate level within Pennsylvania, Illinois and Florida. (See Attachment E pp. 2-3 for intra-state transfers in Pennsylvania contained in the reports.)

In addition, there appears to be a similar pattern of contributions to many of the delegate committees. Many of the committees appear to have received their funds from the same groups. For example, a newspaper article stated that reports filed with the Commission indicate that the UAW has donated $12,000 in six separate contributions of $2,000 each; the AFT gave $6,000; and AFSCME gave $6,000. Likewise, an individual contributor, Richard Dennis, whom Mondale officials reportedly described as a "wealthy commodities dealer", gave $4,000 in varying amounts to 10 different delegate committees in Illinois.27/

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III. APPLICATION OF THE COATTAILS PROVISION

In its third allegation, Complainant contends that the coattails provision presently found in the delegate selection regulations does not apply to delegate committees. A review of the Commission's history in regulating this area is helpful to an analysis of this issue.

26/ See also The Wall Street Journal April 20, 1984.

27/ The Wall Street Journal April 20, 1984. See also Attachment F for additional examples found by this Office in committee reports.

A. History of Delegate Selection Regulations

The Federal Election Campaign Act does not deal separately with delegates and delegate committees. Their activities do, however, impact on the presidential nominating process which is specifically addressed in the Act. Consequently, the Commission has, on numerous occasions, considered the status of delegates and delegate committees in an effort to find the most effective and least burdensome way to prevent the delegate selection process from being used to circumvent the Act's limitations on contributions to and expenditures by presidential candidates.

In 1976, shortly after the Supreme Court's decision in Buckley v. Valeo, 424 U.S. 1 (1976), the Commission issued a policy statement distinguishing between "authorized" and "unauthorized" delegates that support a presidential candidate's campaign. All expenditures made by authorized delegates were applied to the authorizing candidate's state and national spending limits. Similarly, contributions to authorized delegates were considered contributions to the authorizing candidate and were counted toward the candidate's expenditure limit. Contributions to or expenditures by unauthorized delegates had no such effect on the limits applicable to presidential candidates.

Authorization to receive contributions and make expenditures on behalf of a presidential candidate could be express or could arise where the candidate directly or indirectly controlled a delegate's fundraising or spending. The candidate had the legal

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obligation to stay within the Act's limits. Under this policy approach the candidate was considered to have full control over whether the delegate's spending would affect those limits. In contrast, because they were not controlled by the candidate, independent expenditures made by individuals and political committees on the candidate's behalf had no effect on the candidate's limits.

Shortly thereafter, the Commission published a second policy statement applying the principles of the first statement to travel and subsistence expenses. This statement also recognized that delegates would be forming committees which might qualify as political committees under the Act. In such cases, the policy statement permitted contributions up to $5,000 to any slate or group of unauthorized delegates which became a political committee.

In late 1979, during Congressional consideration of legislation which became H.R. 5010, the Commission again considered the delegate question. The Commission published an Advance Notice of Proposed Rulemaking which laid out the 1976 policies and the proposal of the pending Senate bill exempting certain payments to and expenditures by delegates from the requirements of the Act.

On November 8, 1979, a memorandum was circulated for comment to the Commission that discussed past policy and the publication of the Advance Notice and also contained draft proposed regulations. The draft proposals retained the

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authorized/unauthorized distinction, but applied the delegates' contributions and expenditures to the candidate's limits only where the delegate had been authorized in writing. In those situations where the delegate was not so authorized, but made expenditures advocating his or her candidacy and referencing the presidential candidate, the expenditures could be considered in-kind contributions to the candidate. The draft proposals also contemplated activity by delegate committees promoting their own selection as well as their chosen candidate's. Because they were considered political committees under the Act, the draft proposals would have required delegate committees to register and report.

On December 18, 1979, when the Commission first met to discuss the policy issues expected to be addressed in a draft Notice of Proposed Rulemaking, it considered two documents. The first, from the General Counsel, recommended elimination of the authorized/unauthorized distinction in favor of an approach hinging application of the Act's limits on whether the expenditure involved was limited to supporting the delegate or also advocated the candidate's election. The second, from the Executive Assistants ("EAs"), applied the contribution and expenditure limits to candidates only where delegates made contributions to the candidate or made expenditures as the candidate's agent.

The discussion at the meeting centered almost exclusively on the EA memorandum. That memorandum did not present the

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authorized/unauthorized alternative. As a result, the Commission gave up that distinction without discussiion. The Commission decided to draft regulations that would look first to the nature of the expenditure, rather than the relationship of the parties, to determine whether the expenditure would affect the candidate's limits. Payments made by delegates for the purpose of advocating their selection and which also referred to presidential candidates were to be scrutinized. If such expenditures were less than $1,000, a rebuttable presumption that their primary purpose was for the delegate's benefit would apply. For those expenditures over $1,000, no such presumption applied.

The Commission also discussed delegate committees, primarily in the context of what reporting requirements applied to them. In the course of that discussion the question arose whether delegate committees could make the same type of dual purpose expenditures as individual delegates. The consensus was that such activities were permissible but might trigger reporting consequences. Following its adoption of the presumption approach the Commission directed the General Counsel to draft a Notice of Proposed Rulemaking consistent with that action.

Shortly thereafter, H.R. 5010 became law. The Senate bill that would have dealt separately with delegate activity was not adopted. Thus, the new law did not directly address the issue of delegate and delegate committee status.

The draft notice circulated in January, 1980, contained two main proposed changes in the concepts approved in the December

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meeting, resulting from the '79 Amendments. First, the agenda document noted the repeal of the Commission's waiver authority for reporting. Delegate committees would, therefore, be required to register and report subject to the rules applicable to all political committees. Second, the earlier treatment of communications advocating a delegate's selection and making reference to a Presidential candidate was amended to include the new "coattails" provision for pins, bumper stickers, etc. that were distributed by volunteers. The presumption regarding dual purpose expenditures was retained for general public political advertising, but the $1,000 threshold triggering operation of the presumption was discarded.

Discussion at the January 31, 1980 meeting concerning the use of the coattails provision first raised the question of how delegates could be considered outside the definition of "candidate" but still entitled to the benefit of the coattails exemption. The General Counsel's Office suggested that although the definition of the "candidate" was limited to candidates for federal office, the coattails provision was not so limited as it referred to a "candidate for any public office" and, therefore, was sufficiently broad to include delegates. The Commission ultimately adopted that approach in its regulations.

The Commission then discussed what effect the inclusion of the coattails provision would have on the primary purpose test it had previously adopted. Questions were raised regarding the operation of the "primary purpose" presumption since, apart from

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the area covered by the coattails exemption, the presumption would only be used if the expenditure in question did not qualify as either an in-kind contribution, an independent expenditure, or an expenditure made on behalf of the candidate by his or her agent. The point was made that few if any communications would remain to which the presumption would apply. The Commission then removed the primary purpose presumption and instead determined that in the case of communications made through general public political advertising, the payments would be either in-kind contributions, independent expenditures or authorized expenditures made on the candidate's behalf.

On February 14, 1980, at the Commission's final meeting on these proposed rules, it considered a revised Notice of Proposed Rulemaking based on its January 31 discussion. During the meeting, there was concern that some expenditures by a delegate could be made without the candidate's knowledge and yet, through the use of the candidate's materials, a delegate could be viewed as making an in-kind contribution. As a result of this discussion, the Commission decided to draft regulations stating that where the delegate republishes the candidate's materials, the expenditures by the delegate committee should be counted against the candidate's expenditure limits only where there is evidence of coordination between a delegate committee and a candidate.

After the Notice was published, but before the final regulations were drafted, the Commission issued Advisory Opinion 1980-5 which dealt with expenditures by delegates and delegate

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committees. In its opinion the Commission explained that the coattails exemption applied to delegate expenditures for campaign materials which advocated the delegate's selection and referenced a presidential candidate and which were made in connection with volunteer activity. It further explained that delegate expenditures for public media advocating the delegate's selection and referencing a candidate would be considered to be either independent expenditures or in-kind contributions depending upon whether they were made in consultation, cooperation or concert with or at the request or suggestion of a candidate. With respect to delegate committee expenditures, the opinion incorporated by reference the individual delegate expenditure discussion.

In May 1980, the final version of the regulations along with the Explanation and Justification was transmitted to Congress. That version noted that if delegate committees were to make dual purpose expenditures exceeding $1,000, those expenditures would have to be reported.

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B. Analysis

1. Does the Coattails Provision Apply to Delegate Committees?

The complaint argues that:

> 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. § 110.4(e). Under the plain language of the regulations, delegate committees are subject to the same rules as other political committees which advocate the election of a particular presidential candidate.

Original complaint at 3.

* * *

> 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 materials available to individual delegates is not available to committees. (emphasis in original)

Id. at 21. The gravamen of Complainant's argument is that the regulations state clearly on their face that the coattails exemption is only available to individual delegates, not delegate committees.

The fact that the regulations distinguish between committees is not determenative, however, of whether the Commission intended the coattails exemption to pertain to delegate committees. Indeed, the distinction in the regulations reflects the Commission's obligation to apply the reporting requirements to delegate committees, particularly in light of the deletion of its waiver authority by the '79 Amendments. Moreover, the parenthetical cross-references in the provisions governing expenditures by delegates to the reporting obligations of delegate committees supports the interpretation that the Commission provided that delegate committees may also make expenditures under those provisions but must report them. See 11 C.F.R. 110.14(d) and compare with 11 C.F.R. 110.14(e). Therefore, since there is support on the face of the regulations for either interpretation, it is necessary to look to the

Commission's intention when considering these regulations to ascertain which meaning should be applied. The following review of those discussions illustrates that the Commission did not intend to exclude delegate committees from the operation of the coattails provision.

At the December 18, 1979, meeting, at which the presumption regarding dual purpose expenditures was first discussed, the Commission explored the ability of delegate committees to make such expenditures. Although the discussion focused on delegate committee reporting requirements, the Commission evidenced a clear intention to afford delegate committees the same latitude in making expenditures as individual delegates. The only distinction made was the requirement that delegate committees report their activity, a distinction that is illustrated by the inclusion of cross-references contained throughout the final delegate selection regulations. December 18, 1979 Meeting Tr. at 60-61.

After passage of H.R. 5010, the coattails provision was incorporated into the proposed delegate selection regulations. Following publication of the Notice of Proposed Rulemaking, the Commission issued Advisory Opinion 1980-5, which dealt with expenditures by delegates and delegate committees. After detailing the coattail and general media provisions applicable to delegates, the opinion points out that delegates campaigning together as a slate might become a political committee under the Act, and so become subject to the registration, reporting and contribution limits of the Act. It continues:

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> Furthermore, if the expenditures of a delegate political committee are made in circumstances similar to those described in the preceding paragraph (where individual delegates use public media for advocacy of their own selection but also refer to a presidential candidate), such political committee expenditures may be viewed as allocable independent expenditures or as allocable contributions in-kind and corresponding expenditures of the presidential candidate. (citations omitted.)

The clear implication of this passage is that both the general media and the non-media coattails rules apply equally to individual delegates and to delegates acting together as political committees. During his presentation of the draft opinion, Assistant General Counsel Brad Litchfield, stated that the intent of the above-quoted language, "was to, in the case of delegate slate committees, give the same treatment as would be given for individual delegate activity." After a technical amendment by Commissioner Reiche, the Commission unanimously approved the Advisory Opinion. Minutes of March 6, 1980 Open Meeting, at 5.

Throughout the Commission's discussions of the regulations and Advisory Opinion 1980-5, its intention to make the provisions regarding delegates and delegate committees coextensive, but for the committees' reporting obligations, is evident. This intention is reflected in the final regulations through the use of cross-references to the reporting requirements of delegate committees in each of the provisions detailing the rules applicable to delegate expenditures. Respondents further refine

this conclusion by asserting that subsection 110.14(d) "is phrased in terms of the delegate and not delegate committees because the definition of delegate committees includes 'a group of individuals supporting delegates'. The regulations make clear that it is only a committee comprised of delegates that is entitled to avail itself of the volunteer materials exemption." Response at 10, fn. 9.

2. What Communications Are Exempt Under the Coattails Provision?

Inclusion of the coattails provision in the delegate selection regulations reflects the Commission's attempt to balance its concern regarding possible circumvention of a presidential candidate's expenditure limits with a desire to allow delegates some ability to make expenditures mentioning their candidate.

The Commission's regulations at 11 C.F.R. § 110.14(d)(2)(i) describe exempt campaign materials as those:

> which advocate the selection of a delegate and which also include information on or reference to a candidate for the office of President . . . [and] are used in connection with volunteer activities; and . . . are not for costs incurred in the use of . . . general public communication or political advertising.

The regulations, therefore, make it clear that the campaign materials involved must be reviewed on a case-by-case basis to determine whether they are exempt.

Complainant has attached examples of campaign materials that illustrate the kinds of questions that arise in analyzing the campaign literature.

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The first inquiry concerns whether the communication advocates the selection of a delegate or slate of delegates. With regard to the first illustration presented in the complaint, a letter submitted as Exhibit C to the April 18 supplement solely advocates the election of Walter Mondale. The delegate committee paying for the publication is mentioned only in the heading and the required disclaimer. Nowhere does the communication advocate the selection of delegates. It, therefore, does not appear to qualify for exemption and the costs involved should be viewed either as an in-kind contribution or an independent expenditure by the delegate committee on behalf of the Mondale campaign, depending on whether this expenditure was made in coordination with the campaign.

A second publication, included as Exhibit D in the original complaint, makes only passing reference to selection of the delegates. The remainder of the two-page communication is devoted to advocating Walter Mondale's candidacy. Since the regulation, however, does not quantify the relative emphasis that must be placed on advocacy of the delegates versus that of the candidate, it cannot be said absolutely that Exhibit D does not qualify under the coattails exemption.

Finally, Exhibit D of the April 18 supplement clearly advocates the selection of delegates and also advocates the nomination of Walter Mondale, and thus its content appears to be exempt under the coattails provision.

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With regard to the advocacy requirement, Respondents raise an additional question under the regulations regarding literature distributed by at-large delegates who do not appear on the ballot and whose selection rests on the success of their presidential candidate in the primary. In such cases, the literature might only advocate the candidate and make no reference to the at-large delegates other than in the disclaimer notice. Respondents contend that such situations are consistent with Congressional intent in enacting the coattails provision, because Congress intended to leave to the candidate making the expenditure the discretion to decide how best to further his or her own selection. What Respondents fail to recognize is that the coattails provision, as it is applied to the delegate selection process requires campaign materials to "advocate the selection of a delegate" in order for the exemption to apply.

A further allegation by the Complainant is that the expenditures for the campaign materials involved were not made in connection with volunteer activities. In order to qualify for the coattails exemption the campaign materials must be "used in connection with volunteer activities." 11 C.F.R. § 110.14(d)(2)(i)(A). In support of this allegation Complainant cites "numerous instances" where various delegate committees made payments for salaries, per diem or subsistence to out of state residents.

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April 27, 1984 Supplement at 7-9. Complainant, however, makes no connection between these payments and the distribution of campaign materials.28/

Even if the communications satisfy the other requirements of the coattails provision, the expenditures may, in any event, be in-kind contributions because the extent of Mondale Committee involvement in the delegate committee expenditures went far beyond any reasonable consultation contemplated by the exemption.

The Commission assumed that some consultation between delegates and candidates would take place. However, in applying the exemption to delegates, the Commission could not have intended to permit unrestricted involvement by presidential candidates in delegates' coattail expenditures. This is patent from the Commission's frequently voiced concern that regulation of delegate activity should protect against wholesale evasion of the candidates' expenditure limitations. While some measure of cooperation does seem to have been assumed, the regulation should nevertheless be interpreted narrowly to preclude a candidate's orchestrated use of delegate committee expenditures to evade contribution and expenditure limitations.

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28/ A review of some of the delegate committee reports indicates that payments may have been made to individuals for the purpose of distributing committee materials. If such materials prove to be dual purpose expenditures, they would not be exempted under the coattails provision since the materials would not have been used in connection with volunteer activity.

Because of the widespread evidence of coordination between the delegate committees and the Mondale campaign, detailed in the affiliation discussion supra, it appears that even those communications that appear to advocate the selection of a delegate should not necessarily be exempted under the coattails provision.

Respondents would limit the Commission's discussion of whether dual purpose expenditures should be viewed as in-kind contributions or independent expenditures to those communications made through general public political advertising. As noted in the above discussion, several other factors can operate to take an expenditure out of the coattails provision.

3. Republication of Candidate Materials

The regulations contain a separate provision that takes the republication of a candidate's campaign materials by a delegate outside the scope of the coattails exemption. 11 C.F.R. § 110.14(d)(2)(ii)(A)(2).29/ Such republication is considered per se an in-kind contribution by the delegates, but is chargeable against the candidate's expenditure limits only if made "with the cooperation, or with the prior consent of, or in consultation with, or at the request or suggestion of the

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29/ The regulations also specifically take expenditures by delegates for general public communication or political advertising outside the scope of the coattails exemption. 11 C.F.R. § 110.14(d)(2)(i)(B).

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candidate and any authorized agent or committee thereof." The April 18 supplement at Exhibit C appends two examples of the republication of Mondale campaign materials by delegate committees.

Respondents contend that they did not know that the delegate committee had reprinted Mondale literature. In Respondents' view, therefore, the expenditures made in connection with the reprinting should be considered independent expenditures. The regulations preclude this conclusion. The costs of republishing these materials constitute in-kind contributions by the delegate committees. If Respondents' assertion that no coordination concerning these reprints occurred is correct, these costs should not be counted against the Mondale expenditure limits.

IV. APPLICATION OF 11 C.F.R. § 110.1(h)

Section 110.1(h) of the Commission's regulations provides in pertinent part:

> (h) A person may contribute to a candidate or his or her authorized committee with respect to a particular election and also contribute to a political committee which has supported, or anticipates supporting, the same candidate in the same election, as long as-
> (1) The political committee is not the candidate's principal campaign committee or other authorized committee or a single candidate committee;
> (2) The contributor does not give with the knowledge that a substantial portion will be contributed to, or expended on behalf of, that candidate for the same election. . . .

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The effect of this section is to subject all committees supporting a single candidate to a common $1,000 contribution limit that is shared with the candidate. If the Commission finds that the delegate committees are affiliated with the Mondale campaign, no analysis of section 110.1(h) is necessary. As stated before, affiliated committees automatically share a single contribution limitation.

Complainant alleges that contributors of more than $1,000 in the aggregate to the delegate committees knew that substantial portions of their contributions would be expended on behalf of Mondale and, thereby, exceeded the $1,000 contribution limit. A threshold question presented by this allegation is whether the delegate committees, absent the operation of section 110.1(h), are subject to a $1,000 limit on contributions accepted, or may accept contributions of up to $5,000 like "any other political committee" under 2 U.S.C. § 441a(a)(1)(C). The Explanation and Justification to the delegate selection regulations states that "[a] delegate committee would be treated as <u>any other political committee</u> is treated under the Act." 45 Fed. Reg. 34866 (May 23, 1980) (emphasis added). By using the language of 2 U.S.C. § 441a(a)(1)(C), this statement supports the conclusion that delegate committees are normally permitted to accept contributions of up to $5,000.

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Early in the its consideration of the status of delegates under the Act, the Commission stated that contributions to committees of unauthorized delegates were subject to the $5,000 limit. Policy Statement of June 10, 1976.30/ When the Commission again addressed the question of delegates in the context of the delegate selection regulations, it dropped the distinction between authorized and unauthorized delegates but evidenced no intention to change its previous position that the $5,000 limit applied to delegate committees.

It is possible, however, for a committee that is nominally a delegate committee to be subject to a shared $1,000 contribution limit with a candidate due to the operation of 11 C.F.R. § 110.1(h). This could occur where the committee is, in fact, a single candidate committee because all of its expenditures are made to advocate a single candidate's election and/or contributors to the committee knew that a substantial portion of their funds would be used to support the candidate.

In this case, the complaint presents insufficient evidence to support the contention that any of the delegate committees are single candidate committees or that contributors to the delegate committees knew that substantial portions of their contributions would be expended on behalf of Walter Mondale's nomination.

30/ Authorized delegate committees were considered agents of the candidate and, therefore, shared the candidate's $1,000 limit.

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V. APPLICATION OF THE FILING REQUIREMENTS

Pursuant to 2 U.S.C. §§ 433(a) and 434(a) political committees are required to register with the Commission and file reports at specified intervals.

The April 27 supplement at p. 4 alleges that unidentified delegate committees may have failed to register, and that some registered committees have failed to file required reports. In addition, at p. 5 complainant alleges that the New Hampshire 1st and 2nd District Delegates for Mondale Committees filed their reports late.

As the complaint supplies no evidence concerning the identity of the committees that have allegedly failed to register, no action can be recommended at this time. As to the unidentified registered committees that allegedly failed to file reports, because of the many factors involved in determining when a report should have been filed, further review of the reports on file must be made before a recommendation can be made.31/

31/ For example, although the C index lists the dates on which committees registered, it does not state whether such registration was filed before the committee was required to file, nor does it indicate whether the committee should have registered earlier. Each committee's submissions must be reviewed to determine the date upon it they qualified as political committees under the Act and must be compared to primary dates in their respective states to determine when their pre-primary reports become due.

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Complainant has made specific allegations regarding late filed reports by the two New Hampshire delegate committees. Review of the Commission records indicates that their reports were due on April 15, 1984, and were not filed until April 24, 1984.32/

VI. CONCLUSION

Based on the foregoing it appears that:

1) The delegate committees are affiliated with the Mondale for President Committee; therefore, all contributions to the delegate committee should be considered contributions to the Mondale campaign and all expenditures made by the delegate committees should be counted against Mondale's expenditure limits.

2) In the absence of affiliation with the Mondale Committee, the delegate committees made in-kind contributions to the Mondale campaign and the campaign accepted them.

Recommendations

1. Find reason to believe that the Mondale for President Committee, Inc. and Michael S. Berman, as treasurer, accepted excessive contributions in violation of 2 U.S.C. §§ 441a(a) and 441a(f).

2. Find reason to believe that the Mondale for President Committee, Inc. and Michael S. Berman, as treasurer, made excessive expenditures in violation of 2 U.S.C. §§ 441a(b) and 441a(f).

32/ Notice of the complaint and supplements was sent to the two New Hampshire committees on May 4, 1984. As stated previously, this office recommends that the Commission take no action with respect to these committees until the 15 day response period has expired.

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3. Enter into pre-probable cause conciliation negotiations with Mondale for President Committee, Inc. and Michael S. Berman, as treasurer.33/

4. Take no action at this time with respect to the allegation that the delegate committees accepted excessive contributions in violation of 2 U.S.C. §§ 44la(a) and 44la(f).

5. Take no action at this time with respect to the allegation that the delegate committees made, and the Mondale for President Committee, Inc. and Michael S. Berman, as treasurer, received excessive contributions to the Mondale for President Committee, Inc. in violation of 2 U.S.C. § 44la(f).

6. Take no action at this time with respect to the allegation that contributors to delegate committees and to the Mondale for President Committee, Inc. made excessive contributions, based on the operation of 11 C.F.R. § 110.1(h), in violation of 2 U.S.C. § 44la.

7. Take no action at this time with respect to the allegation that some of the delegate committees have failed to register and/or timely report in violation of 2 U.S.C. §§ 433(a) and 434(a).

8. Approve and send the attached letter.

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7 May 1984
Date

Charles N. Steele
General Counsel

33/ Due to the time constraints involved in preparing this report, a proposed conciliation agreement has not yet been drafted.

Attachments

A. Cover letter to Statements of Organization for the 1st Congressional District Delegates for Mondale, the 2nd Congressional District Delegates for Mondale and the 7th Congressional District Delegates for Mondale.

B. List of Illinois Mondale delegate committees that submitted financial reports in the same envelope on March 7, 1984.

C. List of Illinois Mondale delegate committees that used the same printer.

D. First page of the April Quarterly Report of Receipts and Disbursements filed by the 1st and 2nd District Delegate Committees for Mondale in Rhode Island.

E. Partial List of Transfers between the Mondale Delegate Committees.

F. Partial List of Contributions by Union PACs to the Mondale Delegate Committees

G. Proposed Letter.

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

MONDALE

30 W. Washington, Chicago, Il. 60602

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

Dear Sirs:

I am enclosing the ~~statements~~ of organization for the delegate slate committees of the first, second and seventh Congressional ~~Districts~~ of Illinois.

Thank You.

Sincerely,
Donald G. Gray
Illinois State Staff

Attachment A

Pac for Dr Mondale for President, Inc

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ILLINOIS COMMITTEES THAT FILED FINANCIAL DISCLOSURE REPORTS ON March 7, 1984, IN ENVELOPES WITH "ILLINOIS FOR MONDALE" RETURN ADDRESSES

1. 1st Congressional District Delegates for Walter Mondale, Chicago, IL
2. Second Congressional District Delegates for Mondale, Chicago, IL
3. Third Congressional District Delegates for Mondale,
4. Fourth District Mondale Delegate Committee, New Lenox, IL
5. Sixth District Mondale Delegate Committee, Elmhurst, IL
6. 7th Congressional Districts Delegates for Mondale, Chicago, IL
7. Eighth District Mondale Delegate Committee, Chicago, IL
8. Ninth District Mondale Delegate Committee, Evanston, IL
9. 10th District Mondale Delegate Committee, Buffalo Grove, IL
10. Eleventh District Mondale Delegate Committee, Chicago, IL
11. 12th District Mondale Delegate Committee, Hoffman Estates, IL
12. 14th District Delegate Committee for Mondale, Dekalb, IL
13. 16th Delegates for Mondale, Rockford, IL
14. 17th District Mondale Delegate Committee, Rock Island, IL
15. Mondale Delegates for the Illinois 18th Committee, Peoria, IL
16. 19th District Delegates for Mondale Committee, Charleston, IL
17. Delegates for Mondale Committee-21st Congressional District, Fairview Heights, IL
18. 22nd Congressional District Delegates for Mondale, Cobden, IL

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Attachment B

ILLINOIS DELEGATE COMMITTEES THAT USED PROGRESS PRINTING

1. 1st Congressional District Delegates for Walter Mondale, Chicago, IL
2. Fourth District Mondale Delegate Committee, New Lenox, IL
3. Sixth District Mondale Delegate Committee, Elmhurst, IL
4. 7th Congressional District Delegates for Mondale, Chicago, IL
5. Ninth District Mondale Delegate Committee, Evanston, IL
6. 10th District Mondale Delegate Committee, Buffalo Grove, IL
7. Eleventh District Mondale Delegate Committee, Chicago, IL
8. 12th District Mondale Delegate Committee, Hoffman Estates, IL
9. 13th District Mondale Delegate Committee, Alsip, IL
10. 14th District Delegate Committee for MondaleDekalb, IL
11. 16th Delegates for Mondale, Rockford, IL
12. 17th District Mondale Delegate Committee, Rock Island, IL
13. 22nd Congressional District Delegates for Mondale, Cobden, IL

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Attachment C

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

(Summary Page)

24 APR 16 P5:13

ALIGN AREA

ALIGN AREA

1 Name of Committee (In Full)
1st District Delegate Committee
for Mondale
2nd District Delegate Committee
for Mondale (Affiliated Committees)

Address (Number and Street)
1910 Smith Street, Suite 9

City, State and ZIP Code
North Providence, RI 02911

☐ Check here if address is different than previously reported

2 FEC Identification Number
C00177246 and C00177808

3. ☐ This committee qualified as a multicandidate committee during the Reporting Period on _____

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 The Period	COLUMN B Calendar Year-to-Date
5. Covering Period February 7 through April 15		
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)	$ 6,000.00	$ 6,000.00
(d) Subtotal (Add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ 6,000.00	$ 6,000.00
7. Total Disbursements (From Line 28)	$ 3,937.78	$ 3,937.78
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 2,062.22	$ 2,062.22
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

Salvatore Mancini (1st District)
Joseph DeLorenzo (2nd District)

Typed or Printed Name of Treasurer

SIGNATURE OF TREASURER

Date

For further information contact:
Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4068

NOTE: [illegible]

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

FEC FORM 3A (3-80)

Attachment D

NEW HAMPSHIRE TRANSFERS

New Hampshire 1st District Delegates for Mondale C00176909
TO:

Recipient	Transfer Date	Dollar Amount	Receipt Date
Delegates At-Large for Mondale C00180679 (Philadelphia)		1000	3/22/84
7th Congressional District Delegates for Mondale C00178244 (Chicago)	3/20/84	2000	3/12/84
Congressional District 9 Delegates for C00178475 (Land O'Lakes, FL)	3/6/84	1500	
Delegates for Mondale C00178509 (Jacksonville)	3/6/84	1600	?/?/84
CD#1 Delegates for Mondale C00177360 (Pensacola, FL)	3/6/84	50	3/10/84
6th District Delegates for Mondale C00179697 (East Lansing, MI)	3/13/84	4000	
Delegates At-Large For Mondale C00180679 (Philadelphia, PA)	3/31/84	1000	3/22/84

New Hampshire 2nd District Delegates for Mondale (C00176891)
TO:

Recipient	Transfer Date	Dollar Amount	Receipt Date
South Florida Delegates For Mondale C00176875 (Miami)	3/8/84 3/10/84	2750 2000	
Mondale 16th District Delegate Committee C00175950 (Pembroke Pines, FL)	3/9/84	1000	3/8/84
CD 2 Delegates for Mondale, Florida C00177873 (Tallahassee)	3/9/84	1250	3/13/84
Mondale 15th District Delegate Committee C0017664 (Ft. Lauderdale)	3/10/84	2400	
7th Congressional District Delegates for Mondale C00178244 (Chicago)	3/15/84	1500	3/15/84
Delegates At-Large For Mondale C00180679 (Philadelphia)	3/29/84	1500	

Attachment E
Page 1

PENNSYLVANIA TRANSFERS

Delegates At-Large for Mondale C00180679 (Philadelphia, PA)
TO:

Recipient	Transfer Date	Dollar Amount	Receipt Date
Mondale 13th Delegate Committee C00180711 (Philadelphia)	3/25/84 3/28/84	1000 500	
Mondale Delegate Team C00181404 (Doylestown, PA)	3/27/84 3/29/84	1000 1000	
15th CD Delegates (PA) (Allentown, PA)	3/27/84	1000	
Mondale Delegates Committee C00178137 (Reading, PA)	3/28/84	500 1000	3/27/84
10th Congressional District Mondale Delegate Committee C00180141 (Scranton, PA)	3/28/84	1000	
7th Congressional District Mondale Delegates C00180398 (Drexel Hill, PA)	3/29/84	1000	4/2/84
21st Cong 1984 Delegates for Mondale C00179457 (Erie, PA)		1000	3/28/84

Mondale Delegate Committee- 12th Congressional District C00178954 (Apollo, PA)
TO:

Recipient	Transfer Date	Dollar Amount	Receipt Date
7th Congressional District Mondale Delegates C00180398 (Drexel Hill, PA)		1200	3/26/84
Pennsylvania 18th Congressional District Delegates for Mondale C00180729 (Pittsburgh, PA)	3/30/84	500	

Attachment E
Page 2

PENNSYLVANIA TRANSFERS (Continued)

21st Cong 1984 Delegates for Mondale C00179457 (Erie, PA)
TO:

Recipient	Trans Date	Amt	Rec Date
7th Congressional District Mondale Delegates C00180398 (Drexel Hill, PA)	3/26/84	1209	
PA 18th Cong Dist Delegates for Mondale C00180729 (Pittsburgh, PA)	3/30/84	500	

7th Congressional District Mondale Delegates C00180398 (Drexel Hill, PA)
TO:

Recipient	Transfer Date	Dollar Amount	Receipt Date
10th Congressional District Mondale Committee C00181041 (Scranton, PA)		250	2/24/84

22nd Congressional District Delegate Committee for Mondale C00181066 (Washington, PA)
TO:

Recipient	Transfer Date	Dollar Amount	Receipt Date
Kansas At-Large Delegates for Mondale	3/22/84	1000	

Attachment E
Page 3

ILLINOIS TRANSFERS

7th Congressional District Delegates for Mondale C00177139 (Chicago, IL)
TO:

Recipient	Transfer Date	Dollar Amount	Receipt Date
Sixth District Mondale Delegate Cmte C00177139 (Elmhurst, IL)	2/24/84	150	2/24/84 */
10th District Mondale Delegate Cmte C00175836 (Chicago, IL)	2/24/84	250	2/24/84 */
Mondale Delegates For the Illinois 18th Committee C00176198 (Peoria, IL)	3/16/84	1000	

19th District Delegates For Mondale C00178673 (Charleston, IL)
TO:

Recipient	Transfer Date	Dollar Amount	Rec Date
15th District Delegates For Mondale C00177238 (Normal, IL)	3/19/84	500	
Kansas At-Large Delegates For Mondale	3/23/84	2200	

22nd Congressional District Delegates For Mondale C00177840 (Cobden, IL)
TO:

Recipient	Transfer Date	Dollar Amount	Receipt Date
Kansas At-Large Delegates For Mondale	3/22/84	1000	

*/ Reports receipt as from "affiliated" committee

Attachment E
Page 4

KENTUCKY TRANSFERS

Kentucky At-Large Delegates for Mondale C00181024 (Lexington, KY)
TO:

Recipient	Transfer Date	Dollar Amount	Receipt Date
Montana At-Large Delegates for Mondale C00181313 ((Helena, MT)	3/26/84	1500	

MONTANA TRANSFERS

Montana At-Large Delegates For Mondale Committee C00181313 (Helena, MT)
TO:

Recipient	Transfer Date	Dollar Amount	Receipt Date
CD#1 Delegates For Mondale C00177360 (Pensacola, FL)	3/27/84	259.59	
North Dakota Delegates for Mondale (CHECK ID#)	4/2/84	300	

WISCONSIN TRANSFERS

Wisconsin At-Large Delegate Mondale Committee C00180687 (Madison, WI)
TO:

Recipient	Transfer Date	Dollar Amount	Receipt Date
6th District Delegates for Mondale Cmte C00179697 (East Lansing, MI)	3/22/84	3600	

Attachment E
Page 5

PARTIAL LIST OF PAC TRANSFERS TO MONDALE DELEGATE COMMITTEES
Based upon a preliminary review of reports by the Office of the General Counsel

PAC NAME	DATE	RECIPIENT DELEGATE COMMITTEE	AMOUNT
American Federaltion of Teachers, AFT-COPE	2/9/84	New Hampshire 1st District Merrimack, NH	5000
	2/13/84	3rd CD Delegates Jacksonville, FL	2000
	2/15/84	6th CD Delegates Elmhurst, IL	1000
		1st CD Delegates Chicago, IL	1000
		2nd CD Delegates Chicago, IL	1000
		3rd CD Delegates Oak Lawn, IL	1000
	2/16/84	14th CD Delegates Lake Worth, FL	500
		15th CD Delegates FT. Lauderdale, FL	1500
		6th CD Delegates Ocala, FL	500
	2/17/84	9th CD Delegates Land O'Lakes, FL	2000
	2/21/84	South Florida Delegates Miami, FL	2000
	2/27/84	11th CD Delegates Rockledge, FL	500
		Northern 12th CD Delegates St. Lucie, FL	500
	3/2/84	4th CD Delegates New Lenox, IL	1000
	3/6/84	7th CD Delegates Chicago, IL	1500
	3/19/84	Mondale Delegates--DC Washington, DC	500

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Attachment F
Page 1

PAC NAME	DATE	RECIPIENT DELEGATE COMMITTEE	AMOUNT
American Federaltion of Teachers, AFT-COPE (continued)	3/21/84	Montana At-Large Delegates Helena, MT	1000
		3rd CD Delegates Philadelphia, PA	1500
		Pennsylvania At-Large Delegates Philadelphia, PA	5000
		2nd CD Delegates Philadelphia, PA	500
		10th CD Delegates Scranton, PA	1000
		14th CD Delegates Pittsburgh, PA	2000
	3/22/84	Long Island Delegates Long Island, NY	2000
		Naples Delegates Clifton Park, NY	1300
		New York State At-Large Del. New York, NY	5000
		28th CD Delegates Ithaca, NY	2000
		West New York Elect Mondale Cmte Williamsville, NY	3000
		Mondale Team-32nd CD North Tonawanda, NY	3000
		Southern Tier Cmte for Mondale Olean, NY	1500
	3/23/84	7th CD Delegates Briarwood, NY	500
		9th CD Delegates Kew Gardens, NY	250
		10th CD Delegates Brooklyn, NY	500
		12th CD Delegates Brooklyn, NY	250

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Attachment F
Page 2

PAC NAME	DATE	RECIPIENT DELEGATE COMMITTEE	AMOUNT
American Federaltion of Teachers, AFT-COPE (continued)	3/23/84	11th CD Delegates Brooklyn, NY	250
		14th CD Delegates Staten Island, NY	250
		15th CD Delegates New York, NY	750
		17th CD Delegates New York, NY	750
		19th CD Delegates Bronx, NY	300

PAC NAME	DATE	RECIPIENT DELEGATE COMMITTEE	AMOUNT
American Federation of State, County and Municipal Employees AFSCME-PEOPLE	2/10/84	1st District Delegates Merrimack, NH	5000
		15th CD Delegates Lincoln, IL	5000
	2/17/84	9th CD Delegates Evanston, IL	2000
		3rd CD Delegates Oak Lawn, IL	2000
	2/29/84	11th CD Delegates Chicago, IL	1000
	2/22/84	13th CD Delegates Naples, FL	1000
		5th CD Delegates Orlando, FL	1000
		2nd CD Delegates Tallahassee, FL	1000

Attachment F
Page 3

PAC NAME	DATE	RECIPIENT DELEGATE COMMITTEE	AMOUNT
American Federation of State, County and Municipal Employees AFSCME-PEOPLE (continued)	3/1/84	7th CD Delegates Tampa, Fl	1000
	3/7/84	Mondale Delegates-DC Washington, DC	1000
		South Florida Delegates Miami, FL	5000
	3/12/84	1st CD Delegates North Providence, RI	2500
		2nd CD Delegates North Providence, RI	2500
		16th CD Delegates Fort Lauderdale, FL	2000
		3rd CD Delegates Jacksonville, FL	2000
	3/23/84	11th CD Delegates Brooklyn, NY	510
		9th CD Delegates Kew Gardens, NY	375
		8th CD Delegates Bayside, NY	110
		7th CD Delegates Briarwood, NY	45
		6th CD Delegates Rockaway Beach, NY	1410
		Long Island Mondale - 4th CD Garden City, NY	2055
		North County Delegates Gloversville, NY	1210
		Mondale Team North Tonawanda, NY	1215
		Southern Tier Delegates Olean, NY	500

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Attachment F
Page 4

PAC NAME	DATE	RECIPIENT DELEGATE COMMITTEE	AMOUNT
American Federation of State, County and Municipal Employees AFSCME-PEOPLE (continued)	3/23/84 (cont'd)	5th CD Delegates Far Rockaway, NY	500
		19th CD Delegates Bronx, NY	925
		18th CD Delegates Bronx, NY	350
		15th CD Delegates New York, NY	960
		17th CD Delegates Brooklyn, NY	860
		16th CD Delegates New York, NY	335
		14th CD Delegates Staten Islend, NY	355
		13th CD Delegates Brooklyn, NY	15
		12th CD Delegates Brooklyn, NY	510
		19th CD Delegates Bronx, NY	300
		18th CD Delegates Bronx, NY	50
		17th CD Delegates New York, NY	750
		15th CD Delegates New York, NY	750
		14th CD Delegates Staten Island, NY	250
		New York At-Large Delegates New York, NY	5000
		11th CD Delegates Brooklyn, NY	250

8504055531

PAC NAME	DATE	RECIPIENT DELEGATE COMMITTEE	AMOUNT
American Federation of State, County and Municipal Employees AFSCME-PEOPLE (continued)	3/23/84 (cont'd)	9th CD Delegates Kew Gardens, NY	250
		8th CD Delegates Bayside, NY	500
		23rd CD Delegates Albany, NY	845
		Naples Delegates Clifton Park, NY	715
		25th CD Delegates New Hartford, NY	775
		Lower Hudson Delegates Mt. Vernon, NY	565
		New Hampshire 2d CD Delegates Allentown, NH	1350
		21st CD Delegates Erie, PA	1500
		23rd CD Delegates Oil City, PA	1000
		Pennsylvania At-Large Delegates Philadelphia, PA	5000
		16th CD Delegates New York, NY	500
		12th CD Delegates Brooklyn, NY	250
	3/24/84	2nd CD Delegates Philadelphia, PA	1000
		Wisconsin At-Large Delegates Madison, WI	5000

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Attachment F
Page 6

PAC NAME	DATE	RECIPIENT DELEGATE COMMITTEE	AMOUNT
United Auto Workers Voluntary Contributions UAW-V-CAP	2/14/84	20th CD Delegates Forsyth, IL	2000
		16th CD Delegates Rockford, IL	2000
		19th CD Delegates Charleston, IL	2000
		17th CD Delegates Rock Island, IL	2000
		18th CD Delegates Peoria, IL	2000
		12th CD Delegates Hoffman Estates, IL	2000
		New Hampshire 2nd CD Delegates	5000
	3/15/84	6th CD Delegates East Lansing, MI	3000
	3/23/84	New York State At-Large Del. New York, NY	5000
		Pennsylvania At-Large Delegates Philadelphia, PA	5000

8504050555 3

Attachment F
Page 7

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

David M. Ifshin, Esquire
Carolyn U. Oliphant, Esquire
Mondale for President Committee, Inc.
2201 Wisconsin Avenue, N.W.
Suite 100
Washington, D.C. 20007

RE: MUR 1667

Dear Mr. Ifshin and Ms. Oliphant:

The Federal Election Commission notified your clients, the Mondale for President Committee, Inc., and Michael S. Berman, as the treasurer of the Committee, on April 6, 1984, of a complaint alleging violations of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to your clients at that time. In addition, the Commission has received and forwarded to you, supplements to the complaint that were filed with the Commission on April 18 and 27, and May 2, 1984.

Upon further review of the allegations contained in the complaint, the supplements thereto, and information supplied by you, the Commission, on May , 1984, determined there is reason to believe that your clients have violated 2 U.S.C. §§ 441a(a), 441a(b), and 441a(f), provisions of the Act. Specifically, it appears that the Mondale for President Committee, Inc., and Michael S. Berman, as treasurer, accepted excessive contributions in violation of 2 U.S.C. §§ 441a(a) and 441a(f), and made excessive expenditures in violation of 2 U.S.C. §§ 441a(a) and 441a(f).

The Commission acknowledges receipt of your request for conciliation of this matter prior to a finding of probable cause and has agreed to enter into negotiations with you towards reaching a settlement in this matter.

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Attachment G
Page 1

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

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter, at (202) 523-4143.

Sincerely,

8504005537

Attachment G
Page 2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 7, 1984

BY HAND

David M. Ifshin, Esquire
Carolyn U. Oliphant, Esquire
Mondale for President Committee, Inc.
2201 Wisconsin Avenue
Suite 100
Washington, D.C. 20007

MUR 1667

Dear Mr. Ifshin and Ms. Oliphant:

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 and again on April 27, 1984, the Commission received supplemental submissions from the complainant. Copies of those submissions have been forwarded to you. The Commission concluded that both of those supplemental submissions were not amendments to the complaint, but rather supplemented the arguments and facts already presented in the complaint.

On May 4, 1984, the Commission considered the matter and determined that the materials submitted by the complainant on May 2, 1984, also constitute a supplement to the complaint. Therefore, the Commission will proceed with its consideration of this matter pursuant to your earlier notifications. Accordingly, submission of this additional material will not result in the provision of a specific time period for response.

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202)523-4143.

Sincerely,

Charles N. Steele
General Counsel

8504055536

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 7, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Vincent S. Cohen, Esquire
Dianne O'Hara, Esquire
Hogan and Hartson
815 Connecticut Avenue, N.W.
Suite 500
Washington, D.C. 20006

Re: MUR 1667
Mondale Delegates--D.C.
Committee, William Simon,
Treasurer

Dear Mr. Cohen and Ms. O'Hara:

Your clients, the Mondale Delegates--D.C. Committee, and William Simon, as treasurer, have previously been notified that on April 6, 1984, the Federal Election Commission received a complaint which alleges that your clients may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint and supplements received on April 18, 1984, and April 27, 1984, have been previously forwarded to your clients. The Commission, on May 2, 1984, received an additional supplement to the complaint which is enclosed for your information.

Due to the fact that this additional material is not viewed as an amendment to the complaint, but rather as additional factual material, receipt of this information will not extend the time period for you to respond to the original complaint and the supplements previously forwarded to your clients.

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

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

8 5 0 4 0 3 0 5 5 3 7

Mondale for President
2201 Wisconsin Avenue, N.W.
Washington, D.C. 20007
Telephone: 202-625-1984

MONDALE

OCT # 3061

May 7, 1984

MUR 1667
Mira

7 PM 12:42

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

RE: MUR 1667

Dear Mr. Steele:

This is in response to your letter of May 3, 1984. For substantially the same reasons set forth in our letter of April 19, 1984, we believe that the two most recent submissions of Americans with Hart (dated April 27 and May 2) constitute amendments to the original complaint filed on April 6. These submissions raise further new allegations concerning additional delegate committees.

The timing and frequency of these submissions are clearly designed to provide Americans with Hart with repeated opportunities to present their legal opinions and factual conclusions to the Commission. Rather than simply filing additional information, the Hart campaign is continuing to present new legal arguments riddled with inflammatory language.

This pattern of new filings every few days, beginning immediately before the original due date for our response, is a deliberate and highly inappropriate attempt to bypass Commission enforcement procedures by depriving the Mondale for President Committee of an opportunity to respond. Under 2 U.S.C. Section 437g and 11 C.F.R. Section 111, Mondale for President is entitled to an opportunity to respond to these amended complaints. These submissions, which are part of the political strategy of the Hart Committee, should not be considered by the Commission unless we are provided with a full opportunity to reply.

Sincerely,

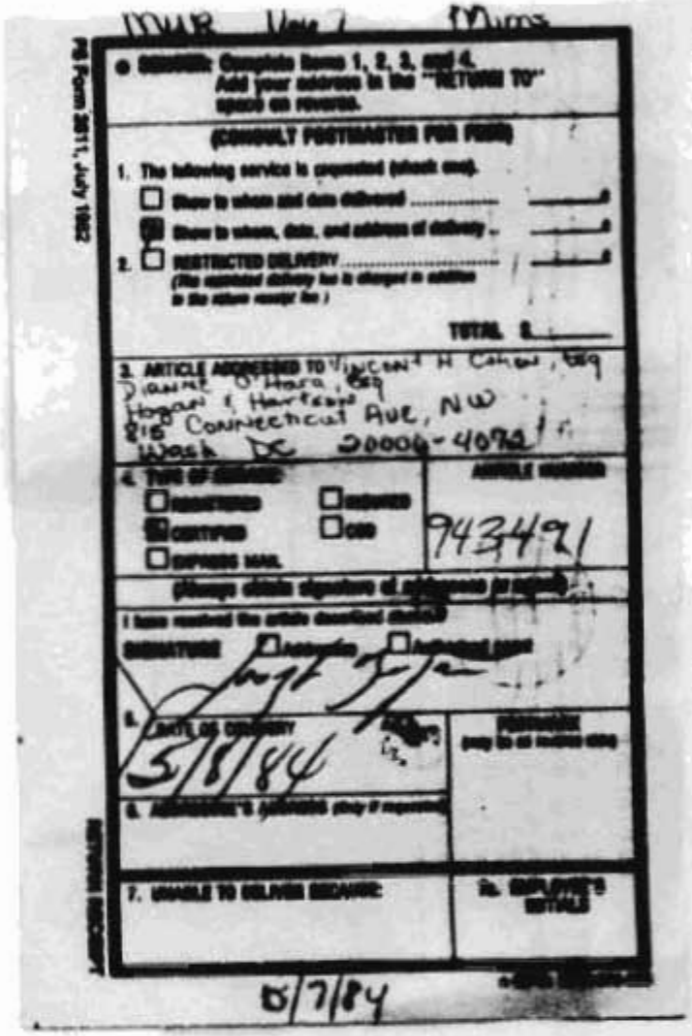
David M. Ifshin
General Counsel

Cyn Oliphant
Carolyn U. Oliphant
Deputy General Counsel

Paid for by Mondale for President, Inc.

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8504050553 9



MWR Vol 7 Mims

PS Form 3811, July 1983

• IMPORTANT: 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 above service fee.)

TOTAL ¢

3. ARTICLE ADDRESSED TO: Vincent H Cohen, Esq
Diane O'Hara, Esq
Hogan & Hartson
815 Connecticut Ave, NW
Wash DC 20006-4078

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

ARTICLE NUMBER: P 943491

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

5. DATE OF DELIVERY: 5/8/84

6. ADDRESSEE'S ADDRESS (ONLY if requested and fee paid)

7. UNABLE TO DELIVER BECAUSE:

8. EMPLOYEE'S INITIALS

5/7/84

8504035540

IMPORTANT

must
DELIVE
TOD

MONDALE

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

Mondale for President
2301 Wisconsin Avenue, N.W.
Washington, D.C. 20007
Telephone: 202-625-1984

MONDALE

MUR 1667
Memo

GCC #3140

May 7, 1984

MAY 7 P12:42

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

RE: MUR 1667

Dear Mr. Steele:

Mondale for President Committee, Inc., has recently been contacted by attorneys for two delegate committees who have apparently just received notification of the above-referenced complaint. Ordinarily, a complaint names all putative respondents so it is evident who receives notification. In this case, it is not apparent from the face of the complaint who has received notification. Accordingly, we request that you inform us immediately of any other committees which have been notified by the Commission.

Thank you for your consideration of this matter.

Sincerely,

David M. Ifshin
General Counsel

Lyn Oliphant
Carolyn U. Oliphant
Deputy General Counsel

LO/jhl

8504050541

Paid for by Mondale for President, Inc.

IMPORTANT

must be delivered today. 5/7/84

8504055542

ONDALE

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

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1667

NAME OF COUNSEL: Vincent H. Cohen and Dianne O'Hara

ADDRESS: 815 Connecticut Avenue, N.W.
Suite 500
Washington, D.C. 20006-4072

TELEPHONE: (202) 331-4586

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

May 4, 1984
Date

Charlene Drew Jarvis
Signature

RESPONDENT'S NAME: Mondale Delegates--D.C. Committee

ADDRESS: 1200 Massachusetts Avenue, N.W.
Washington, D.C. 20005

HOME PHONE:

BUSINESS PHONE: (202)289-6926

8504055543

OCC # 3045

LAW OFFICES OF
HOGAN & HARTSON
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
815 CONNECTICUT AVENUE
WASHINGTON, D. C. 20006-4078
(202) 331-4600

VINCENT H. COHEN, P.C.
DIRECT DIAL NUMBER
(202) 331-4600

CABLE: "HOGANBER WASHINGTON"
TELEX: 89-2701, INTL. 64052
TELECOPIER (202) 331-4778,
331-2887 OR 331-4769

4 P3:57

May 4, 1984

BY HAND

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

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

8504055544

Dear Mr. Steele:

As counsel for the D.C. Committee for Mondale Delegates (see enclosed Statement of Designation of Counsel), I have recently received voluminous materials which include a complaint and supplement totaling over fifty pages and containing several, broadly drafted charges, a number of exhibits, and many other documents, all of which must be analyzed thoroughly in order to formulate an adequate response to every charge asserted by Americans With Hart, Inc. Furthermore, it will be necessary to meet with several members of the D.C. Committee to ascertain all the relevant facts in this case. All this must be accomplished in addition to counsel's already heavy caseload.

For these reasons, counsel for the D.C. Committee for Mondale Delegates hereby requests an extension of fifteen days from the original May 12, 1984 deadline in which to respond to the complaint filed against it, during which time counsel will be able to properly investigate and respond to all charges levied against the D.C. Committee.

Your assistance in this matter will be greatly appreciated.

Sincerely,

Vincent H. Cohen

Vincent H. Cohen

Enclosure
cc: (w/ enc.) Mondale Delegates - D.C. Committee
c/o Charlene Drew Jarvis
1200 Massachusetts Avenue, Northwest
Washington, D.C. 20005

FROM VHCOHEN

HOGAN & HARTSON

815 CONNECTICUT AVENUE

WASHINGTON, D. C. 20006-4072

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

BY HAND

RECEIVED BY THE FEC
84 MAY 7 AM 8:08

ONE CHASE MANHATTAN PLAZA
NEW YORK, N. Y. 10005

84 MAY 7 P12:08

MUR 1667
Memo

May 2, 1984

Re: MUR 1667

Dear Mr. Steele:

Please be advised that Thomas D. Barr and I have agreed to represent the New York At-Large Delegates for Mondale Commission and its treasurer, Chester J. Straub, in the referenced matter.

Your letter to Mr. Straub dated April 26, 1984, inviting him to respond to the allegations set forth in the complaint and the supplement to the complaint, first came to our attention last Monday, May 30. Mr. Barr and I will undertake as promptly as possible to investigate those allegations and inquire into the legal issues they raise. However, Mr. Barr is currently out of the country and will not be returning to his office until next week. I understand that his business schedule requires him to be out of town again briefly shortly after his return to the United States.

In view of Mr. Barr's unavailability, and of our need to consult with our clients and to determine their status in this matter, we hereby request an extension of time to and including May 30, 1984 to respond to your letter of April 26 and the materials enclosed therewith.

Thank you.

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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84 MAY 7 AM 8:0

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 4, 1984

BY HAND

David M. Ifshin, Esquire
Carolyn U. Oliphant, Esquire
Mondale for President Committee, Inc.
2201 Wisconsin Avenue
Suite 100
Washington, D.C. 20007

MUR 1667

Dear Mr. Ifshin and Ms. Oliphant:

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, the Commission received a supplemental submission from the complainant. A copy of that submission was forwarded to you.

On April 27, the Commission received another submission from the complainant also pertaining to the allegations in the complaint. A copy of that submission was forwarded to you on April 30, 1984. A separate letter from the Office of the General Counsel was delivered to you on that day indicating that the Commission would decide whether the additional materials that were submitted on April 27, 1984, would be considered as a supplement or as an amendment to the complaint.

On May 1, 1984, the Commission considered the matter and determined that the materials that were submitted by the complainant on April 27, 1984, constitute a supplement to the complaint. Therefore, the Commission will proceed with its consideration of this matter pursuant to your earlier notifications. Accordingly, submission of this additional material will not result in a specific time period for response.

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

8504005548

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 4, 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:

You have previously been notified 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 and a supplement received on April 18, 1984, were forwarded to you at that time. The Commission, on April 27, 1984, received an additional supplement to the complaint which is enclosed for your information. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

Due to the fact that this additional material is not viewed as an amendment to the complaint, but rather as additional factual materials, receipt of this information will not extend the time period for you to respond to the original complaint and the supplement previously forwarded to you.

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.

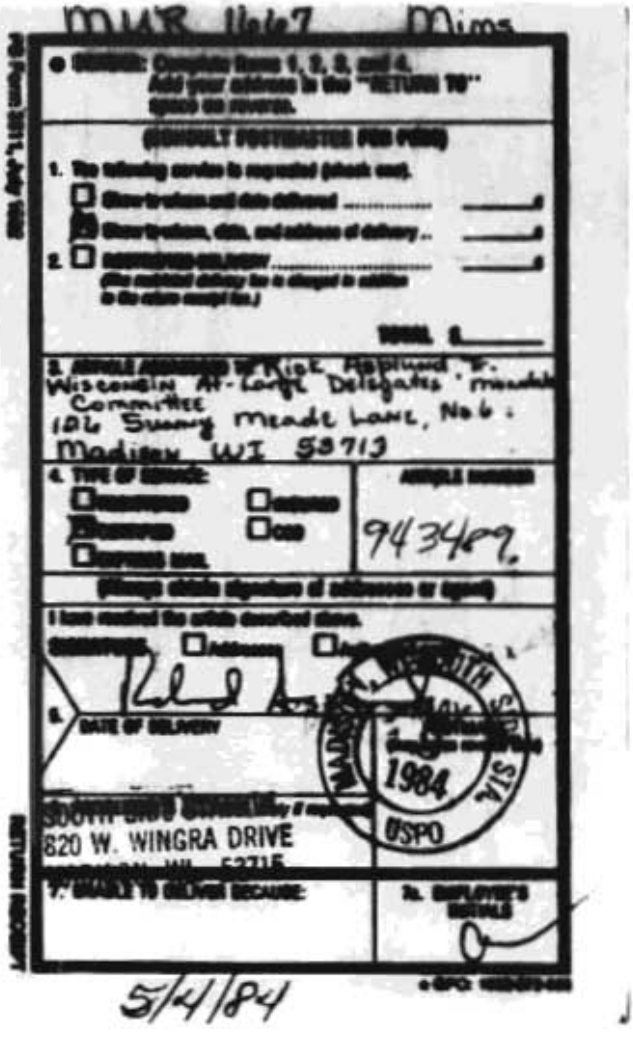
8504055542

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Enclosure



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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 4, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

William H. Simons, Treasurer
Mondale Delegates -- DC Committee
1917 Randolph Street, N.E.
Washington, D.C. 20018

Re: MUR 1667

Dear Mr. Simons:

You have previously been notified 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 and a supplement received on April 18, 1984, were forwarded to you at that time. the Commission, on April 27, 1984, received as additional supplement to the complaint which is enclosed for your information. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

Due to the fact that this additional material is not viewed as an amendment to the complaint, but rather as additional factual materials, receipt of this information will not extend the time period for you to respond to the original complaint and the supplement previously forwarded to you.

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.

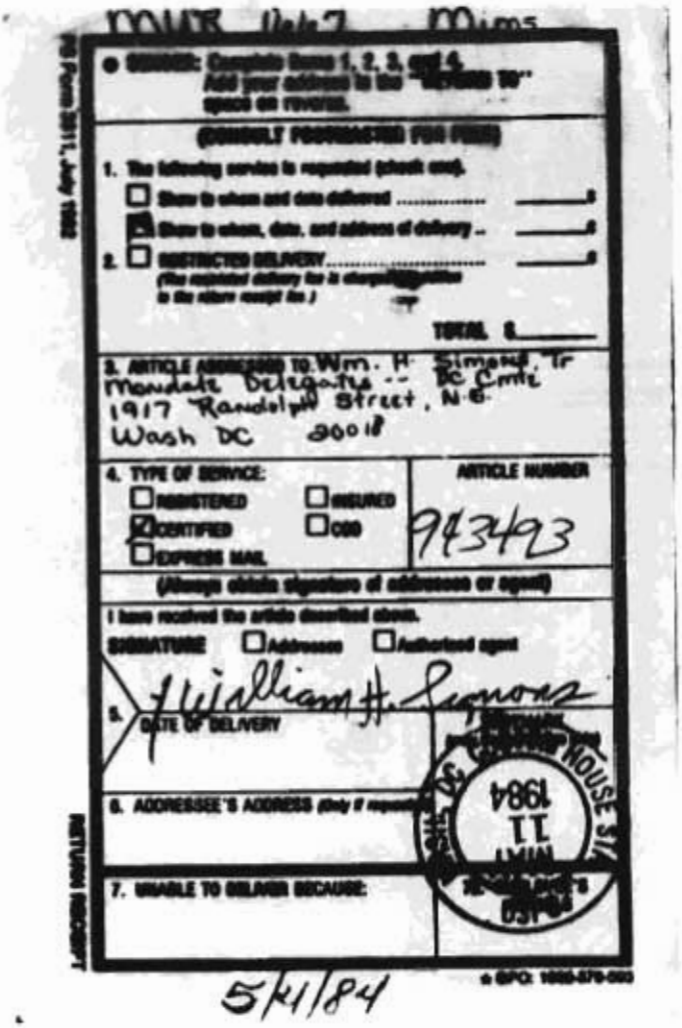
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If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Enclosure



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 4, 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:

You have previously been notified 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 and a supplement received on April 18, 1984 were forwarded to you at that time. The Commission, on April 27, 1984, received an additional supplement to the complaint which is enclosed for your information. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

Due to the fact that this additional material is not viewed as an amendment to the complaint, but rather as additional factual materials, receipt of this information will not extend the time period for you to respond to the original complaint and the supplement previously forwarded to you.

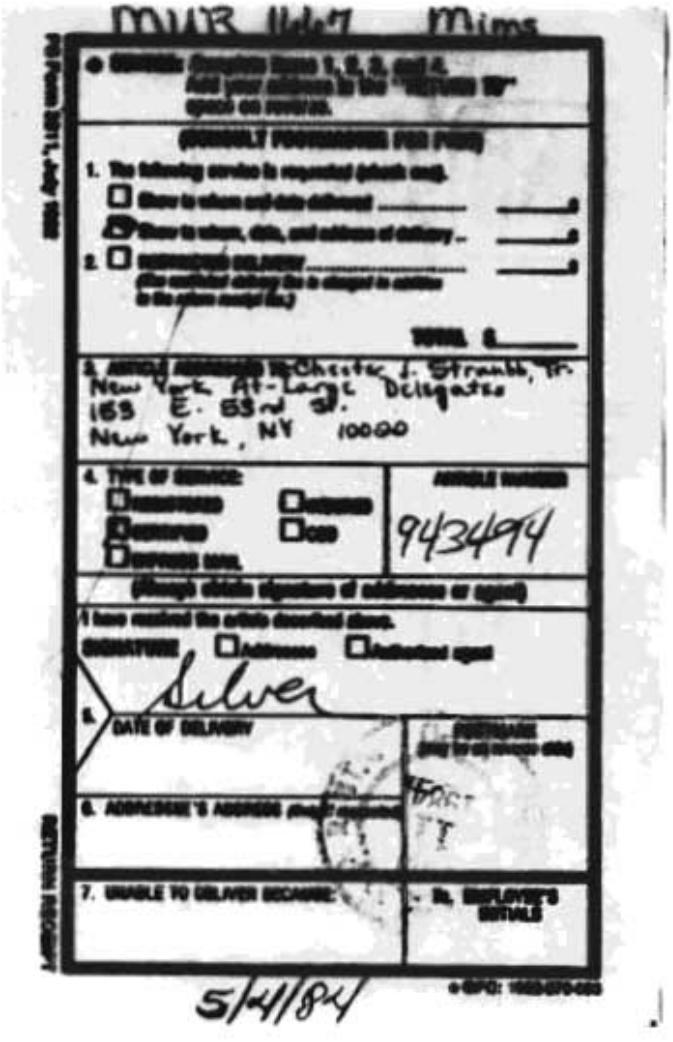
This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

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

Sincerely,

Charles N. Steele
General Counsel

Enclosure


MUR 1467 Mims

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
(for restricted delivery fee a receipt is available on the return receipt card)

3. Article Addressed to: Chester J. Straub, Jr.
New York At-Large Delegate
159 E. 53rd St.
New York, NY 10022

4. Type of Service: ☐ Registered ☐ Insured ☐ Certified ☐ COD ☐ Express Mail
Article Number: 943494

(Always obtain signature of addressee or agent)
I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
Silver

5. DATE OF DELIVERY
POSTMARK

6. ADDRESSEE'S ADDRESS (Only if requested and fee paid)

7. UNABLE TO DELIVER BECAUSE:
8. EMPLOYEE'S INITIALS

5/4/84

3 5 7 4 0 2 3 5 5 5 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 4, 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:

You have previously been notified 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 and a supplement received on April 18, 1984, were forwarded to you at that time. The Commission, on April 27, 1984, received an additional supplement to the complaint which is enclosed for your information. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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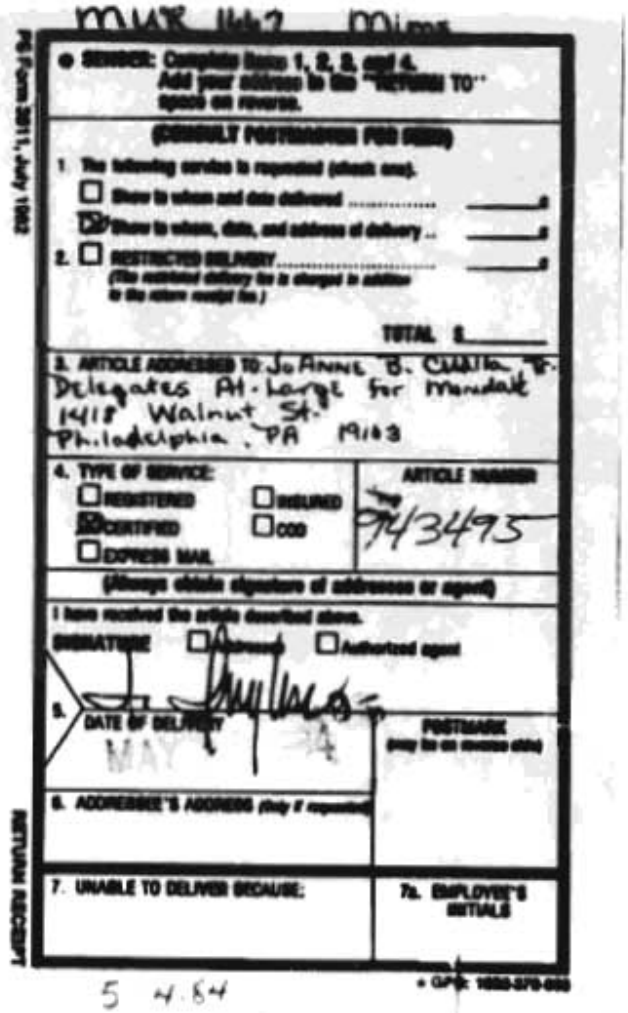
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If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Enclosure


MAR 1982 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: JoAnne B. Curtis
Delegates At-Large for Mondale
1418 Walnut St.
Philadelphia, PA 19103

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

ARTICLE NUMBER
P 143495

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
MAY 4

POSTMARK (May be on reverse side)

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

RETURN RECEIPT

PS Form 3811, July 1982

5 4 84

* GPO: 1982-370-865

8574030555 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 4, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Larry D. Owen, Treasurer
Sixth District Delegates
For Mondale Committee
1019 Huntington
East Lansing, MI 48823

Re: MUR 1667

Dear Mr. Owens:

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 and supplements received on April 18, and April 27, 1984, 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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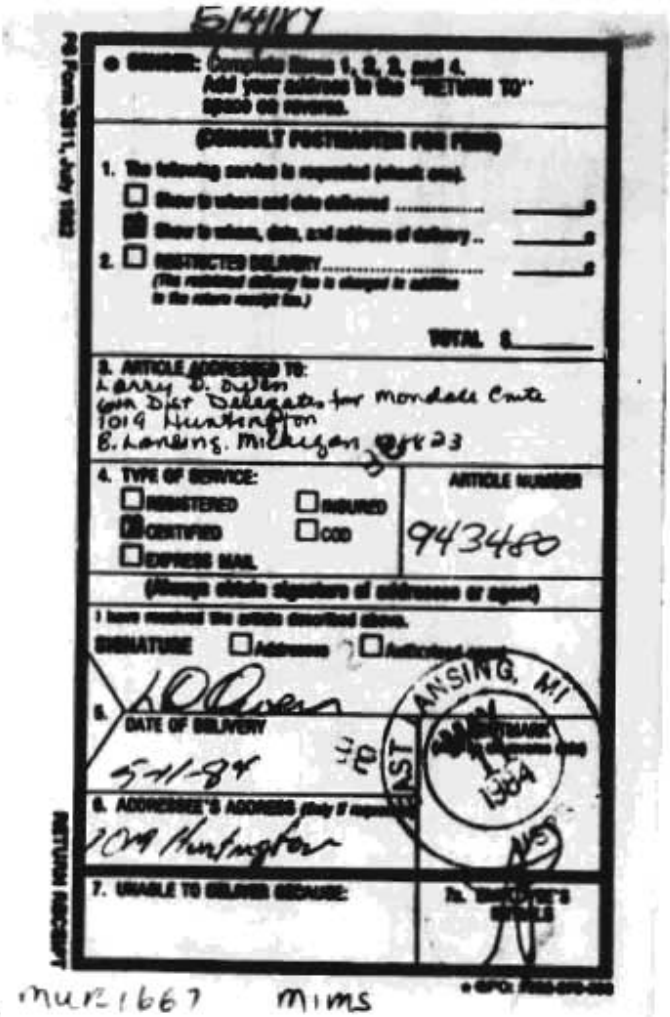
If you intend to be represented by counsel in this matter please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

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

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



MUR1667 Mims

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 4, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Terrie L. Hanus, Treasurer
Fourth District Mondale
Delegate Committee
1210 Timber Place, Apt 1B
New Lenox, Illinois 60451

Re: MUR 1667

Dear Ms. Hanus:

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 and supplements received on April 18, and April 27, 1984, are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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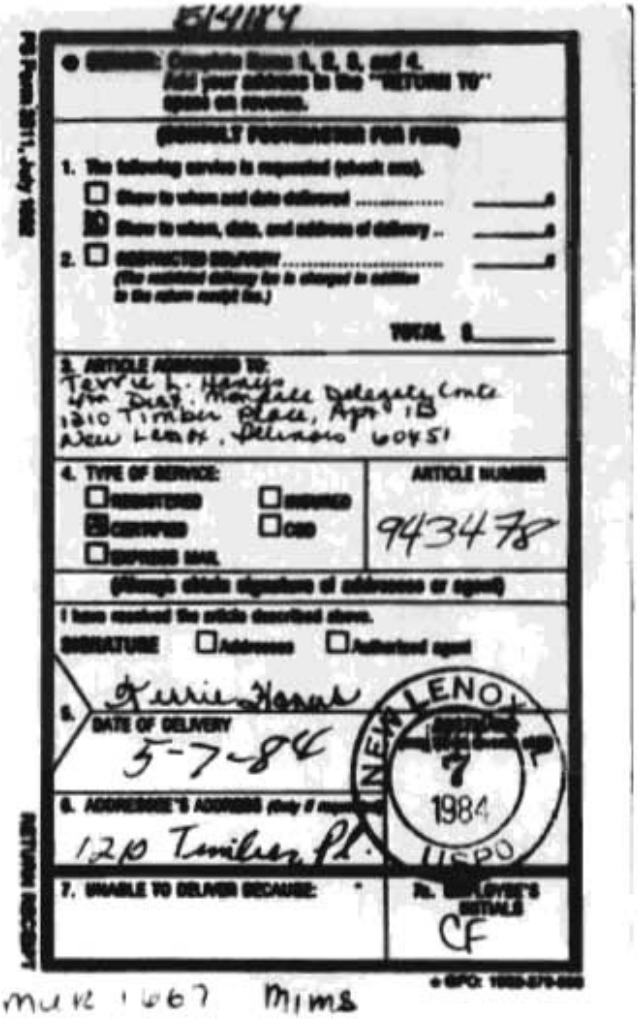
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If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

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



MUR 1067 Mims

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 4, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Patrick C. Brumleve, Treasurer
22nd Congressional District
Delegates For Mondale
P.O. Box 111
Cobden, Illinois 60451

Re: MUR 1667

Dear Mr. Brumleve:

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 and supplements received on April 18, and April 27, 1984, are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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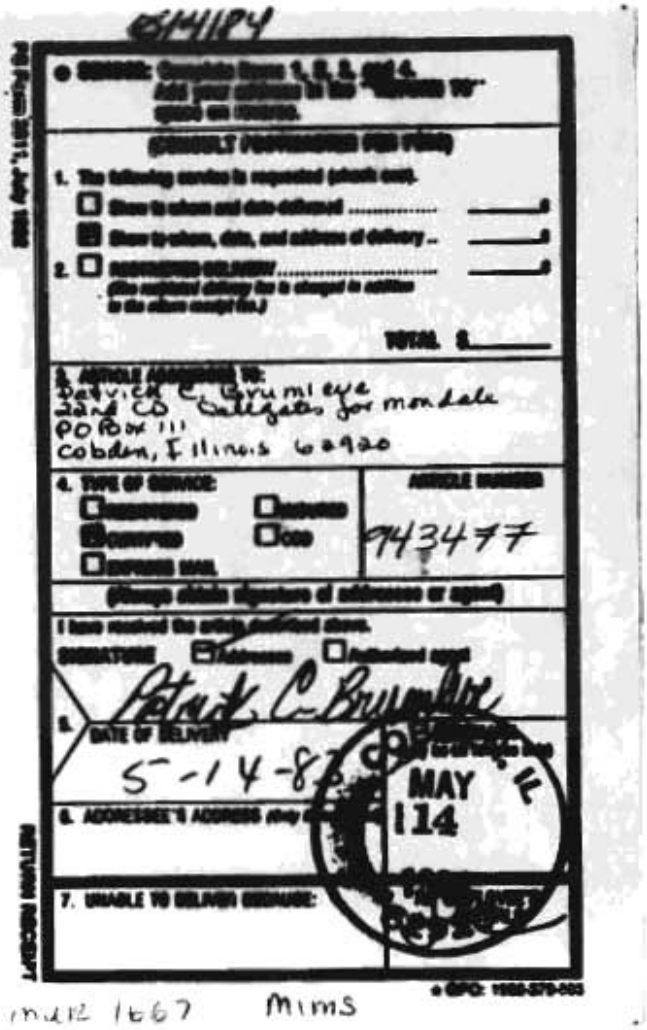
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

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

8 5 0 4 2 0 5 5 5 5 6 7



MUR 1667 Mims

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 4, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ralph Coldiron, Treasurer
Kentucky At-Large Delegates
For Mondale Committee
1513 Pinemeadow Drive
Lexington, Kentucky 40504

Re: MUR 1667

Dear Mr. Coldiron:

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 and supplements received on April 18, and April 27, 1984, 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

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

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 4, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Kansas At-Large Delegate
Committee
c/o Terry Scanlon
715 West Tenth Street
Topeka, Kansas 66612

Re: MUR 1667

Dear Mr. Scanlon :

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 supplements received on April 18, and April 27, 1984, are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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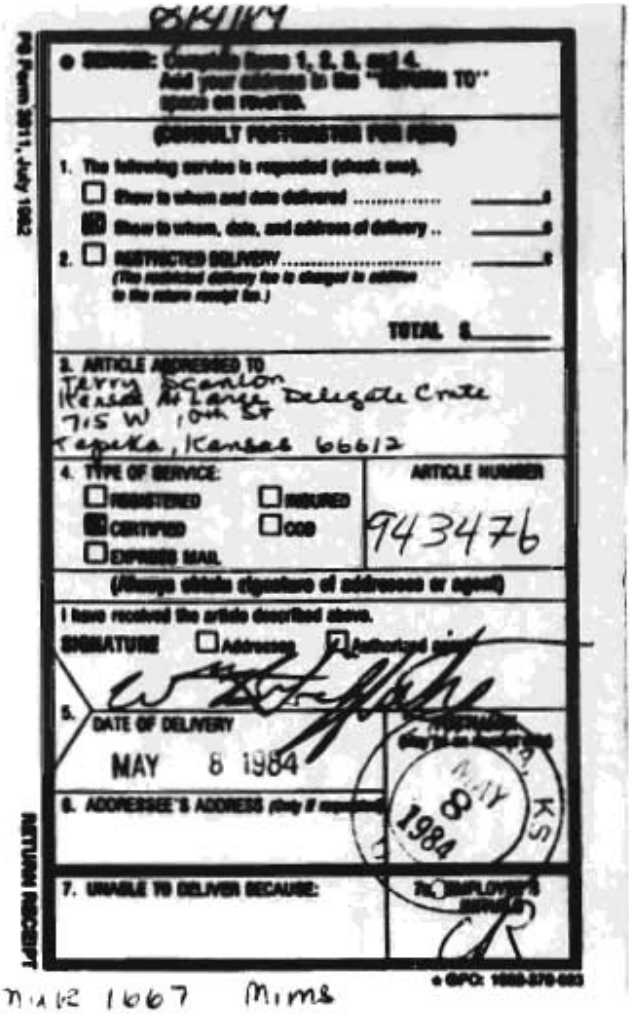
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

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

8504133554



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 4, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Nicholas Spaeth, Treasurer
North Dakota Delegates For
Mondale Committee
70 N 5
Fargo, North Dakota 58107

Re: MUR 1667

Dear Mr. Spaeth:

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 and supplements received on April 18, and April 27, 1984, are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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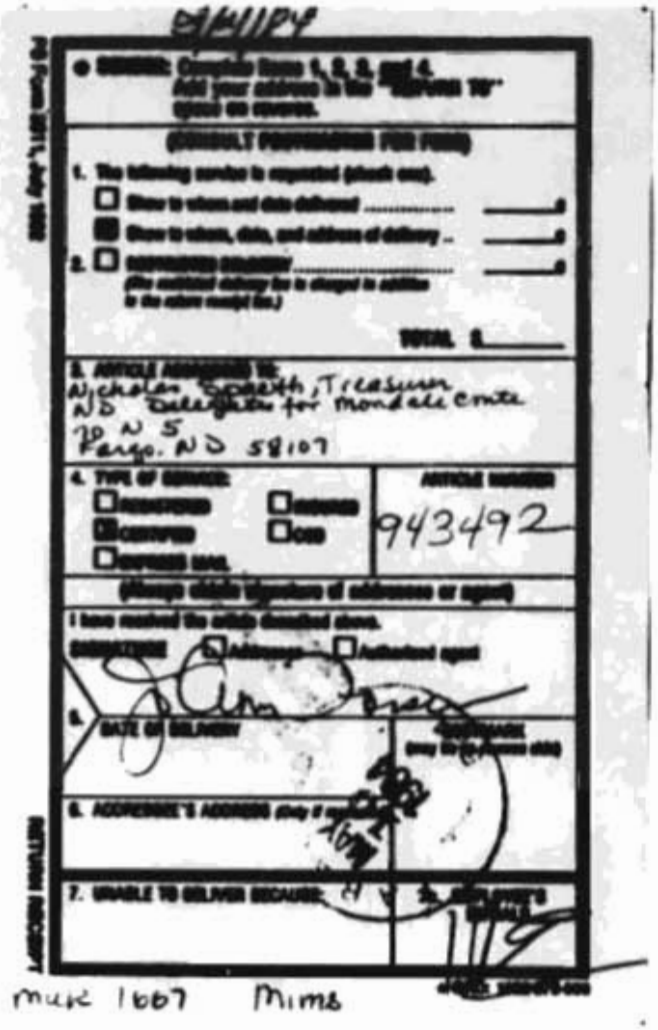
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If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

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



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 4, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Kevin D. O'Connor, Treasurer
Fifth District Mondale
Delegate Committee
538 N32
Milwaukee, WI 53208

Re: MUR 1667

Dear Mr. O'Connor:

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 and supplements received on April 18, and April 27, 1984, are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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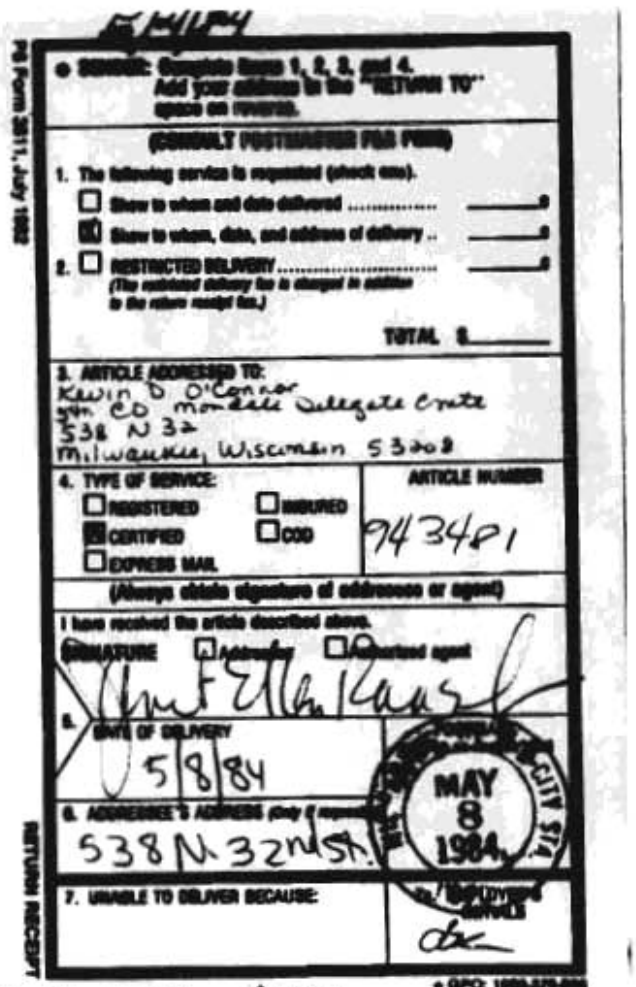
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If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

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


PS Form 3811, July 1983

• 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:
Kevin D O'Connor
4th CO mondale Delegate Crate
538 N 32
Milwaukee, Wisconsin 53208

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

ARTICLE NUMBER
P 743 481

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY
5 8 84

6. ADDRESSEE'S ADDRESS (Only if requested)
538 N. 32nd St.

MAY 8 1984

7. UNABLE TO DELIVER BECAUSE:

RETURN RECEIPT

• GPO: 1983-376-865

MUR 1667 Mims

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 4, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Anthony Redington, Treasurer
New Hampshire Second District
Delegates For Mondale
4 Neil Drive
Allenstown, NH 03275

Re: MUR 1667

Dear Mr. Redington:

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 and supplements received on April 18, and April 27, 1984, are enclosed. We have numbered this matter MUR 1667. Please refer to this number in all future correspondence.

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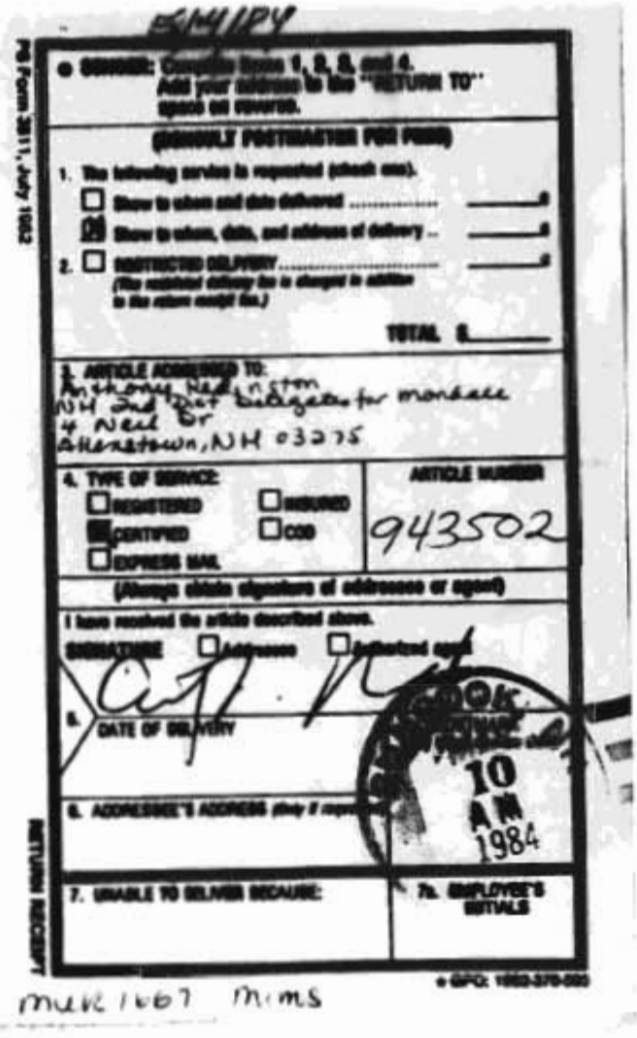
If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

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

8 5 0 4 0 3 5 5 7 0



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 4, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Blake Wordal, Treasurer
Montana At-Large Delegates
For Mondale Committee
846 E. Sixth Avenue
Helena, MT 59601

Re: MUR 1667

Dear Mr. Wordal:

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 and supplements received on April 18, and April 27, 1984, 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.

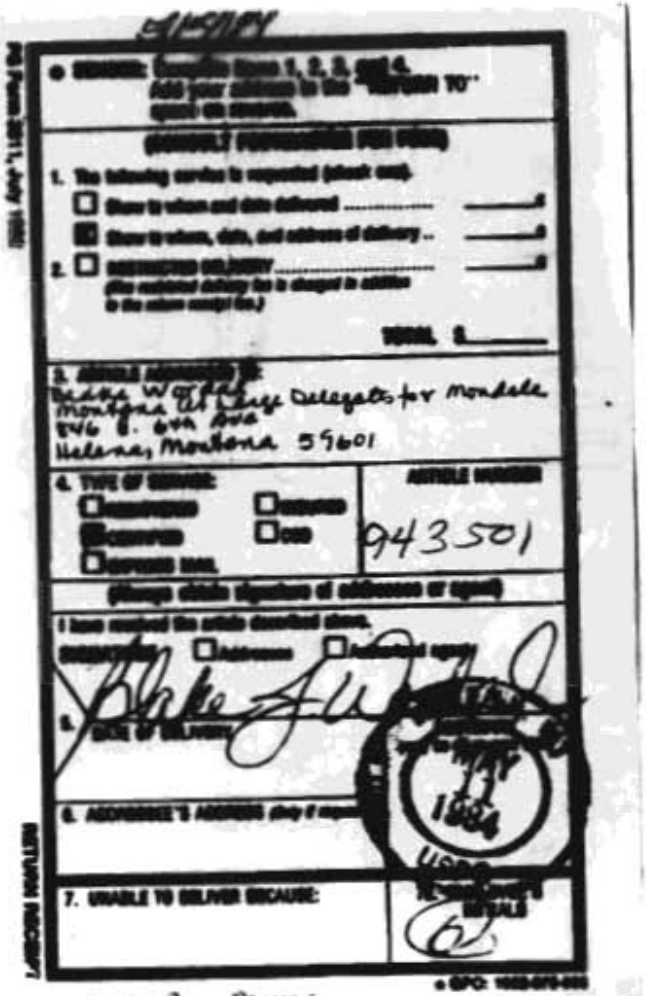
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If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202) 523-4143. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

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



667 Mims

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 4, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Nancy Ryan, Treasurer
New Hampshire First District
Delegates For Mondale
5 Haines
Merrimack, NH 03054

Re: MUR 1667

Dear Ms. Ryan:

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 and supplements received on April 18, and April 27, 1984, 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

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



BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1667
Mondale for President Committee)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on May 4, 1984, the Commission decided by a vote of 6-0 to take the following actions in MUR 1667:

1. Determine that the additional materials submitted by the complainant on May 2, 1984, constitute a supplement to the complaint; therefore, no specific time period should be granted for responding to the supplemental material.

2. Notify the Mondale Delegates--D.C. Committee of the additional materials submitted on May 2, 1984.

3. Approve and send the letter to the Mondale for President Committee as attached to the General Counsel's May 3, 1984 Memorandum to the Commission.

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

Attest:

5-4-84
Date

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

Received in Office of Commission Secretary: 5-3-84, 12:25
Circulated on 48 hour tally basis: 5-3-84, 4:00

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SENSITIVE

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

84 MAY 3 P12: 25

May 3, 1984

MEMORANDUM

TO: The Commission

FROM: Charles N. Steele
General Counsel

SUBJECT: Additional Materials Received From The Complainant In MUR 1667

On May 2, 1984, the Office of the General Counsel received additional materials from the complainant in MUR 1667. A copy of that submission was circulated to the Commission on May 2, 1984.

On May 3, 1984, the Mondale for President Committee, Inc., was sent a copy of these materials. A cover letter was sent to the Mondale Campaign indicating that the Commission would consider the submission to determine whether this additional material would be viewed as a supplement or as an amendment to the original complaint that was filed with the Commission on April 6, 1984.

In view of the Commission's determinations on April 12, 1984, and its subsequent treatment of additional submissions by the complainant, the General Counsel's Office recommends that the Commission view these materials as a supplement rather than as an amendment, to the complaint. A preliminary review of this most recent submission indicates that no new allegations are made. The materials focus on the amplification of arguments previously made and provide some additional factual materials. If the Commission concludes that the materials constitute an amendment to the complaint, the Mondale Campaign should be afforded a specific time period in which to file a response to the new materials.

Unlike the previous two supplemental submissions, these materials do not include specific references to possible violations by delegate committees that have not yet been notified of the complaint by the Commission. Although references are made to delegates committees in North Carolina and Maryland, none of the committees are specifically mentioned. This recent submission does include additional factual materials regarding the activities of one of the four delegate committees (the Mondale Delegates--D.C. Committee) that was previously notified

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by this Office pursuant to the Commission's decision on April 24, 1984. The General Counsel's Office is of the opinion that the Mondale Delegates--D.C. Committee should also receive copies of the additional materials that were filed on May 2, 1984.

Recommendations

1. Determine that the additional materials submitted by the complainant on May 2, 1984, constitute a supplement to the complaint; therefore, no specific time period should be granted for responding to the supplemental material.

2. Notify the Mondale Delegates--D.C. Committee of the additional materials submitted on May 2, 1984.

3. Approve and send the attached letter to the Mondale for President Committee.

Attachment

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

8504030557 2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

BY HAND

David M. Ifshin, Esquire
Carolyn U. Oliphant, Esquire
Mondale for President Committee, Inc.
2201 Wisconsin Avenue
Suite 100
Washington, D.C. 20007

MUR 1667

Dear Mr. Ifshin and Ms. Oliphant:

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 and again on April 27, 1984, the Commission received supplemental submissions from the complainant. Copies of those submissions have been forwarded to you. The Commission concluded that both of those supplemental submissions were not amendments to the complaint, but rather supplemented the arguments and facts already presented in the complaint.

On May , 1984, the Commission considered the matter and determined that the materials submitted by the complainant on May 2, 1984, also constitute a supplement to the complaint. Therefore, the Commission will proceed with its consideration of this matter pursuant to your earlier notifications. Accordingly, submission of this additional material will not result in the provision of a specific time period for response.

If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202)523-4143.

Sincerely,

Charles N. Steele
General Counsel

Attachment 1

8504055580

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 May 1, 1984, do hereby certify that the Commission took the following actions in MUR 1667:

1. Decided by a vote of 5-0 that the additional materials submitted by the complainant on April 27, 1984, constitute a supplement to the complaint; therefore, no specific time period should be granted for responding to the supplemental material.

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

2. Decided by a vote of 5-0 to notify the four delegate committees that have already been notified of the complaint of the additional materials submitted on April 27, 1984. (Wisconsin At-Large Delegates Committee, At-Large Delegates Committee (PA), New York At-Large Delegates Committee, and the Mondale Delegates--D.C. Committee).

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

(Continued)

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3. Decided by a vote of 5-0 to send copies of the complaint and subsequent submissions to the following delegate committees not previously notified:

   a. New Hampshire 1st District Delegates for Mondale
   b. New Hampshire 2nd District Delegates for Mondale
   c. Kentucky At-Large Delegates for Mondale Committee
   d. Montana At-Large Delegates for Mondale Committee
   e. North Dakota Delegates for Mondale Committee
   f. 6th District Delegates for Mondale Committee (MI)
   g. Kansas Mondale At-Large Committee
   h. 5th Congressional District Mondale Delegates Committee (WI)
   i. 22nd Congressional District Delegates for Mondale (IL)
   j. Fourth District Mondale Delegate Committee (IL)

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

4. Decided by a vote of 6-0 to approve and send the letter attached to the General Counsel's report dated April 30, 1984.

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

Attest:

5-1-84
Date

Marjorie W. Emmons
Secretary of the Commission

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SENSITIVE

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

84 APR 30 P4: 31

April 30, 1984

Submitted Late

MEMORANDUM

EXECUTIVE SESSION
MAY 1 1984

TO: The Commission

FROM: Charles N. Steele
General Counsel

SUBJECT: Additional Materials Received From The Complainant In MUR 1667

On April 27, 1984, the Office of the General Counsel received additional materials from the complainant in MUR 1667. A copy of that submission was circulated to the Commission earlier today.

On April 30, 1984, the Mondale for President Committee, Inc., was sent a copy of these materials. A cover letter was sent to the Mondale Campaign indicating that the Commission would consider the submission to determine whether this additional material would be viewed as a supplement or as an amendment to the original complaint that was filed with the Commission on April 6, 1984.

In view of the Commission's determinations on April 12, 1984, the General Counsel's Office requests that the Commission consider at its Executive Session scheduled for May 1, 1984, the issue whether these materials should be considered as a supplement or amendment to the complaint. In the event that the Commission concludes that the materials constitute an amendment to the complaint, the Mondale Campaign should be afforded a specific time period in which to file a response to the new materials.

This Office has conducted a preliminary review of these additional materials and is of the view that no new allegations are contained in the submission of April 27, 1984. These materials do, however, include specific references to possible violations by delegate committees that have not yet been notified of the complaint by the Commission. The Office of the General Counsel believes that certain additional committees should now be notified. Furthermore, this recent submission includes additional factual materials regarding the activities of the four delegate committees that were previously notified by this Office pursuant to the Commission's decision on April 24, 1984. The General Counsel's Office is of the opinion that those four

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committees should also receive copies of the additional materials that were filed on April 27, 1984.

An additional matter should be discussed at the meeting on May 1, 1984. Certain issues flow from the possible affiliation among the delegate committees. Among those is the question whether contributors to the committees should receive copies of the complaint at this stage. For example, the allegations by the complainant conclude that if the delegate committees are affiliated, certain political action committees (PAC's), and others, may have exceeded the contribution limitations of 2 U.S.C. § 441a(a). This Office is of the view that the allegations contained within the complaint, and additional materials subsequently submitted, do not warrant notification of the contributors at this stage. Should the Commission receive additional information indicating that specific contributors have exceeded the limitations, such contributors will be notified.

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Recommendations

1. Determine that the additional materials submitted by the complainant on April 27, 1984, constitute a supplement to the complaint; therefore, no specific time period should be granted for responding to the supplemental material.

2. Notify the four delegate committees that have already been notified of the complaint of the additional materials submitted on April 27, 1984. (Wisconsin At-Large Delegates Committee, At-Large Delegates Committee (PA), New York At-Large Delegates Committee, and the Mondale Delegates--D.C. Committee)

3. Send copies of the complaint and subsequent submissions to the following delegate committees not previously notified:

a. New Hampshire 1st District Delegates For Mondale
b. New Hampshire 2nd District Delegates For Mondale
c. Kentucky At-Large Delegates For Mondale Committee
d. Montana At-Large Delegates For Mondale Committee
e. North Dakota Delegates For Mondale Committee
f. 6th District Delegates For Mondale Committee (MI)
g. Kansas Mondale At-Large Committee
h. 5th Congressional District Mondale Delegates Committee (WI)
i. 22nd Congressional District Delegates For Mondale (IL)
j. Fourth District Mondale Delegate Committee (IL)

4. Approve and send the attached letter.

Attachment

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

3504055537

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

BY HAND

David M. Ifshin, Esquire
Carolyn U. Oliphant, Esquire
Mondale for President Committee, Inc.
2201 Wisconsin Avenue
Suite 100
Washington, D.C. 20007

MUR 1667

Dear Mr. Ifshin and Ms. Oliphant:

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, the Commission received a supplemental submission from the complainant. A copy of that submission was forwarded to you.

On April 27, the Commission received another submission from the complainant also pertaining to the allegations in the complaint. A copy of that submission was forwarded to you on April 30, 1984. A separate letter from the Office of the General Counsel was delivered to you on that day indicating that the Commission would decide whether the additional materials that were submitted on April 27, 1984, would be considered as a supplement or as an amendment to the complaint.

On May 1, 1984, the Commission considered the matter and determined that the materials that were submitted by the complainant on April 27, 1984, constitute a supplement to the complaint. Therefore, the Commission will proceed with its consideration of this matter pursuant to your earlier notifications. Accordingly, submission of this additional material will not result in a specific time period for response.

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

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 3, 1984

BY HAND

David M. Ifshin, Esquire
Carolyn U. Oliphant, Esquire
Mondale for President Committee, Inc.
2201 Wisconsin Avenue
Suite 100
Washington, D.C. 20007

MUR 1667

Dear Mr. Ifshin and Ms. Oliphant:

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. On April 18, and April 27, 1984, the Commission received supplemental submissions from the complainant. Copies of those submissions have been forwarded to you. After reviewing the supplemental submissions, the Commission concluded that they were not amendments to the complaint, but rather constituted the submission of additional factual and legal materials. You have been notified of the Commission's decision regarding the treatment of the additional submissions. On April 30, 1984, the Office of the General Counsel received your response to the complaint and is presently reviewing the materials that you have submitted.

On May 2, 1984, the Commission received additional information from the complainant concerning the allegations raised in the initial complaint and the supplements, a copy of which is enclosed.

A copy of this additional material has been forwarded to the Commission for a determination whether it should be treated as a supplement or as an amendment to the complaint. Should the Commission determine that it is an amendment, you will be afforded a specific period in which to respond to this material. You will be notified of the Commission's determination within five days. If you have any questions, please contact Stephen Mims, the attorney assigned to this matter at (202)523-4143.

Sincerely,

Charles N. Steele
General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 30, 1984

BY HAND

David M. Ifshin, Esquire
Carolyn U. Oliphant, Esquire
Mondale for President Committee, Inc.
2201 Wisconsin Avenue
Suite 100
Washington, D.C. 20007

MUR 1667

Dear Mr. Ifshin and Ms. Oliphant:

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, the Commission received a supplemental submission from the complainant. A copy of that submission was forwarded to you.

On April 27, the Commission received another submission from the complainant also pertaining to the allegations in the complaint. A copy of that submission was forwarded to you earlier today.

A copy of this additional material has been forwarded to the Commission for a determination whether it should be treated as a supplement or as an amendment to the complaint. Should the Commission determine that it is an amendment, you will be afforded an additional response period. You will be notified of the Commission's determination within five days. 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

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6 cc # 3020

Mondale for President
2301 Wisconsin Avenue, N.W.
Washington, D.C. 20007
Telephone: 202-625-1900

MONDALE

April 30, 1984

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

84 APR 30 AM 9:24

Re: MUR 1667

Dear Mr. Steele:

This letter and supporting exhibits constitute the response of the Mondale for President Committee, Inc. ("MPC" or the "Committee") to the complaint Americans with Hart, Inc. ("Complainant" or "Hart Committee") filed on April 6, 1984.1/ In its complaint the Hart Committee asks the Commission to find and declare publicly 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 asks the Commission to conclude that all committees established by Mondale delegates are affiliated with one another and MPC. That conclusion would, of course, subject MPC and the delegate committees to a common contribution and expenditure limitation. Finally, the complaint makes the broad allegation that these delegates' grass roots efforts somehow constitute a scheme by MPC to evade the Act's expenditure limits.

1/ On April 18, 1984, Complainant amended the complaint. MPC requested an extension of time on April 18 to review transcripts of the Commission meetings on the delegate regulations. On April 19, the Committee requested its statutory 15 days to respond to the amended complaint. On April 20, the Commission granted MPC a 7-day extension of time to respond to both submissions.

Paid for by Mondale for President, Inc.

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The Commission should find no reason to believe that a violation of the Act or regulations has occurred. From its inception MPC has been fully committed to observance of expenditure limits, contribution restrictions, and every other element of the Act. The regulations permitting grass roots activity by delegates are an established part of the law, deliberately crafted by the Commission to encourage mass participation in presidential campaigns. Moreover, allowing delegate committees to make grass roots expenditures that promote presidential candidates affirmatively fosters the "team" campaigning Congress and the Commission have sought to encourage.

The gravamen of the complaint -- that individual delegates, but not delegates who form committees, may avail themselves of Section 110.14(d)(2)(i) -- ignores the language, history, and policy of the statute and the regulations. The complaint's second contention, that all committees established by Mondale delegates are affiliated, rests on the wrong legal standard and has no support in the evidence. The Complainant also grossly distorts isolated statements by MPC officials and examples of legitimate delegate committee activity. As to both arguments, the complaint confuses the separate regulations relating to delegates, affiliated committees and independent expenditures.

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BACKGROUND

1. The origin of the delegate regulations.

Following the 1976 presidential election, there was universal concern over the Act's impact on grass roots campaign acti-

vity. The expenditure limits on presidential campaigns had forced campaign officials to marshall most of their spending for media, polling, and candidate travel. Missing -- or at least relatively rarely found -- were the elements needed for meaningful mass participation on the local level by a candidate's supporters. The presidential campaigns in 1976 had drastically limited their field organizations and spent "almost nothing for buttons, bumper stickers, yard signs and traditional paraphernalia." "From Lowly Grass Roots, Mighty Votes are Growing", New York Times, October 5, 1980, Section 4, page 5, Col. 1.2/

The Commission shared the general concern over the Act's unintended and unwanted effect on grass roots campaigning. In July 1979, the then FEC Chairman urged Congress to amend the statute to remove the legal hurdles to coordinated grass roots participation. He testified that: "Unfortunately, the FECA has had, or is perceived to have had, some unforeseen effects on party and grass roots political activity." Widespread volunteer and similar activity was, he said, "the essence of healthy election campaigning." Federal Election Campaign Act Amendments of 1979: Hearings before the Senate Committee on Rules and Administration, 96th Cong., 1st Sess. at 8 (1979).

Congress and the Commission responded to these concerns with changes to encourage more grass roots campaign activity. As one avenue for increasing grass roots activity, Congress enacted the

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2/ As one Republican state chairman complained, "The law says we can spend no more than $1,000. We spend the $1020, so the last $20 is probably a felony." Id.

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coattails provision of the Federal Election Campaign Act Amendments of 1979. 2 U.S.C. § 431(8)(B(xi). Under the new provision, candidates for public office may pay for campaign materials that refer to another candidate without making a contribution, if the materials are for use in connection with volunteer activity. Candidates, including a presidential candidate, may now coordinate grass roots campaigning among themselves without running afoul of the Act.

The Commission's delegate regulations implement the same objective for delegates.[3/] Delegates may refer to their presidential candidate and other delegates in grass roots campaign efforts without making a "contribution" under the Act. Like the statutory coattails provision, the regulations are designed to encourage delegates to campaign "as a team" -- with other delegates and their presidential candidate -- at the grass roots level.[4/]

2. Facts

The committees established by Mondale delegates are autonomous entities, which were established, financed, maintained and controlled by the delegates who comprise them. They are individuals who have been slated as Mondale delegates, who wish to

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3/ For simplicity, MPC will refer to delegate candidates as "delegates" -- as the regulation does.

4/ "Since similar campaign activity [to that fostered by the statutory coattails provision] in the delegate selection process should be encouraged, the subsections governing expenditures by delegates incorporate this exemption." FEC Explanation and Justification, 1 Fed. Elec. Camp. Fin. Guide (CCH) ¶ 864 at 1561-7.

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promote their selection as delegates to the Democratic National Convention. In promoting their candidacies these delegates have engaged in precisely the types of grass roots activity that the Commission and Congress intended to encourage. FEC Explanation & Justification, 1 Fed. Elec. Camp. Fin. Guide (CCH) ¶ 864 at 1561-67; H.R. Rep. No. 96-422, 96th Cong., 1st Sess. 9-10 (1979).

MPC had a proper interest in assisting delegate committees to engage in permissible activities aimed at furthering the delegates' selection. At the same time, MPC knew that delegates operating through committees would ensure full, open reporting of the sources and uses of their funds. (Exhibit 4) Thus, in January, 1984, MPC decided to inform delegates of the regulations permitting them to form committees to advance their candidacies. The Commission had expressly contemplated that campaigns would disseminate information about these regulations to their delegates. FEC Meeting, January 31, 1980, Transcript at 40.

Since most delegates normally lack a working knowledge of the complexities of federal election law, MPC also decided to provide compliance guidance. From time to time when delegates had specific questions as to how best to comply with regulations, MPC offered compliance assistance. In addition, MPC staff sometimes conferred with delegates in the preparation of volunteer campaign materials, as the regulations allow.

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I. ALL DELEGATES, WHETHER ACTING AS INDIVIDUALS OR IN COMMITTEES, MAY AVAIL THEMSELVES OF THE SPECIAL TREATMENT ACCORDED TO EXPENDITURES FOR CAMPAIGN MATERIALS USED IN VOLUNTEER ACTIVITIES

In order to encourage grass roots campaigning, the delegate regulations free spending for certain campaign materials used in connection with volunteer activities ("volunteer" campaign materials) from the Act's contribution and expenditure limitations. The central issue Complainant raises is whether delegates who act through a committee may spend for volunteer campaign materials on the same terms available when they act individually.

The regulations' language expressly allows all delegates, whether acting individually or through committees, to make these expenditures without regard to the contribution or expenditure definitions. All delegates may make these expenditures with their own funds or funds raised from others and still fall within the exemption. Nothing in the regulations, their history, or their underlying objective, limits this right to individual action. The only interpretation consistent with the Commission's and Congress' objectives is to allow delegates to exercise these rights through committees as well as individually.

A. The Regulations Exempt Delegates' Expenditures for Volunteer Campaign Materials Whether They Make Them Individually Or In A Committee

1. The regulations treat all delegates the same for purposes of volunteer campaign materials.

The Commission's regulations separate contributions to and expenditures by delegates into several categories. The basic

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regulatory approach first defines the rights of all delegates and, second, spells out the specific, additional requirements that apply to committees in a separate section.

-- First, contributions to delegates to further their own selection are neither limited nor reportable. The regulation refers parenthetically to section 110.14(e) for the only limitations and reporting requirements applicable to contributions to delegate committees. (Section 110.14(c)).5/

-- Second, expenditures from delegates' own funds or from contributions to them to advocate just the delegates' selection are neither limited nor reportable. Again, the regulation refers parenthetically to section 110.14(e) for the reporting requirements relating to delegate committees. (Section 110.14(d)(1)).

-- Third, expenditures from delegates' own funds or from contributions to them for campaign materials,

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5/ Delegate committees may accept contributions of up to $5,000 from any person. A.O. 1980-5. Complainant, in support of its argument that all delegate committees should share a single $1,000 contribution limit, cites 11 C.F.R. Section 110.1(h)(2). Complaint at 26. If section 110.1(h)(2) applied to all contributions to delegate committees, it would render meaningless the $5,000 contribution limit to a delegate committee. By this analysis no individual could in any event contribute more than $1,000. The Commisssion rejected this notion when it established a separate contribution limit for such committees and rejected distinguishing in the regulations between authorized and unauthorized delegates. Moreover, the Commission decision that the $5,000 contribution limit applies demonstrates that delegate committees are not candidate committees.

such as pins, bumper stickers, and brochures, which advocate the candidacies of delegates and a presidential candidate and which are used in connection with volunteer activity, are not reportable, not "contributions" to the presidential candidate, and not "expenditures" that count against the presidential candidate's limitations.6/ As above, the regulation refers parenthetically to section 110.14(e) for reporting requirements relating to delegate committees. (Section 110.14 (d)(2)).

-- Fourth, a final section sets forth additional requirements that arise when delegates or their supporters make expenditures in groups.7/ If delegates act through committees: (a) they must register and report their contributions and expenditures; (b) contributions to them are subject to the limits of Section 441a(a) of the Act; and (c) if they make contributions, they are also subject to Section 441(a)(a) of the Act. (Section 110.14(e)).

These regulations broadly entitle all delegates to spend unlimited amounts for (a) advocating their own selection and (b) volunteer campaign materials which promote both delegates and their presidential candidate. The materials must be for use in

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6/ Expenditures for general public advertising do not qualify for the exemption.

7/ A "delegate committee" includes a group of delegates and a group of individuals supporting delegates.

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volunteer activities and involve no general public advertising. When delegates exercise these rights as committees, they must register, report, and observe the Act's limits when making or receiving contributions. The same rules, however, prescribe their rights when making expenditures on volunteer campaign materials, individually or through committees. All delegates may make these exempt expenditures.8/

Sections 110.14(c) and 110.14(d) prescribe the exemptions available to all delegates. The parentheticals in those sections do not modify these exemptions. Instead, they refer to section 110.14(e), which prescribes the only differences delegates must observe when acting as committees. Those differences relate solely to disclosure and contribution limitations. Section 110.14(e) nowhere limits the exemption conferred on all delegates in section (d) for expenditures for volunteer campaign materials. Delegates acting as committees may therefore spend for volunteer materials under the rules established in sections (c) and (d).

Complainant attempts to restructure the regulations and rewrite the parentheticals in sections 110.14(d)(1) and (d)(2). As noted, the parentheticals in section 110.14(d)(1)

8/ Thus section 110.14(d)(1), stating that delegate expenditures to advocate their own selection are not subject to limitation, does not treat such expenditures differently when made by a delegate committee. Section 110.14(d)(2)(i), stating that delegate expenditures for volunteer campaign materials promoting both the delegate and the presidential candidate are not subject to limitation, similarly does not treat these expenditures differently when made by a delegate committee.

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and (d)(2) refer the reader to section 110.14(e) only for "reporting requirements related to delegate committees" (emphasis added). Complainant would change them to read "limitations on expenditures and reporting requirements relating to delegate committees." Further, where the Commission imposed different contribution limitations on delegate committees, it also referred to those in the parenthetical cross-references. The only cross-reference as to expenditures merely requires that delegate committees report expenditures for volunteer campaign materials. It does not eliminate their right to make those expenditures.

Section 110.14(e), which prescribes the sole differences in treatment for committees, makes no mention of limiting the rights of delegates to make exempt expenditures when acting as a committee. The Commission certainly knew how to spell out special restrictions on delegate committees. It did just that for reporting requirements and contribution limits, but not for expenditures.9/

One consequence of the Commission's deliberate effort to encourage grass roots campaigning bears emphasis. Delegates, individually or in groups, may consult and coordinate with their

9/ Complainant argues that the references in section 110.14(d) to "a delegate" preclude "delegates" from engaging in grass roots activity under the exemption. Their assumption that a delegate who joins with another delegate is no longer entitled to this right is unwarranted. Section (d) is phrased in terms of the delegate and not delegate committees because the definition of delegate committees includes "a group of individuals supporting delegates." The regulations make clear that it is only a committee composed of delegates that is entitled to avail itself of the volunteer materials exemption.

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presidential candidate's campaign in spending for volunteer campaign materials that mention the presidential candidate. Since these expenditures are not contributions, they are neither subject to limitation nor must they satisfy the requirements of independent expenditures. The question whether campaign materials which mention the candidate constitute in-kind contributions or independent expenditures arises only where they involve general public advertising. Cf. 11 C.F.R. Section 110.14(a)(2)(ii) and Section 110.14(d)(2)(i).

2. The Commission confirmed this interpretation in AO 1980-5.

During the Commission's deliberations on an advisory opinion issued prior to the final adoption of the delegate regulations, the Commission made it clear that the new regulations would treat spending by individual delegates and delegate committees the same way. In Advisory Opinion 1980-5, dated March 10, 1980, the Commission concluded that an individual delegate may make unlimited expenditures for volunteer campaign materials which advocate selection of the delegate and a presidential candidate.10/

During the Commission's deliberations, N. Bradley Litchfield, Assistant General Counsel for Advisory Opinions, pointed out to the Commission that the opinion summarized the key points contained in the Commission's Notice of Proposed Rulemaking for Section 110.14. In the process he expressly clarified

10/ The opinion also concludes that these expenditures are not reportable. Both conclusions rest on the coattails exemption.

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that the intent of the regulatory language ". . . was in the case of delegate slate committees [to] give the same treatment as would be given for individual delegate activities. . . ." The Commission voted 5-0 to amend the advisory opinion to include a paragraph intended to clarify this.[11/]

3. The Commission confirmed the right of delegate committees to avail themselves of the expenditure exemption in its recent summary of the regulations.

In the Commission's recently published comprehensive summary of the delegate regulations, it confirmed the application of the volunteer campaign materials exemption to delegate committees. PEC RECORD (December, 1983).[12/] In summarizing the restrictions on expenditures by delegate committees, it said:

> All expenditures by a delegate committee are reportable. An expenditure for public political advertising which advocates the selection of a delegate and 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. (emphasis added)

The summary alerts delegate committees to those expenditures which are reportable or might be treated as contributions subject to limitation. Because expenditures by committees for volunteer

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11/ Complainant improperly describes the conclusion of AO 1980-5, Complaint at 20, suggesting that the Commission indicated that all expenditures of a delegate committee which advocate a particular candidate must be either independent expenditures or in-kind contributions. However, in that passage in the advisory opinion, the Commission was referring explicitly to general public advertising, just as it did in its summary in the PEC Record.

12/ This Record article was in the "800 Line" section, which summarizes subjects concerning which the PEC public information lines have received many inquiries. The very decision to address delegate regulations in this section reflects substantial public inquiry concerning delegate activities.

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campaign materials are exempt from any limitation, they are not referred to in the summary.

B. Permitting delegate committees to make unlimited expenditures for volunteer campaign materials furthers the policy of the regulations

1. The objectives of the model: the "coattails" provision

The Commission expressly patterned the delegate regulations on the coattails provision enacted in the Federal Election Campaign Act Amendments of 1979. 2 U.S.C. Section 431(8)(B)(xi). As noted, Congress designed the coattails amendment to encourage grass roots, team campaigning. The Commission has expressly sought to promote the same policy objectives in the delegate regulations. 1 Fed. Elec. Camp. Fin. Guide (CCH) ¶ 864 at 1561-7.13/

The critical distinction in both the coattails provision and the delegate regulations is not between individuals and committees. Rather, it is between expenditures for (a) general public advertising and (b) grass roots campaign materials used in connection with volunteer activities. Under the regulations, delegates (like candidates under the statute) may make unlimited

13/ Prior to 1976, delegates were not regulated at all, in part because a delegate is not a candidate for federal office within the meaning of the Act. AO 1975-12. Persistent concerns as to the extent of the Commission's jurisdiction, if any, over delegates has constrained the scope of the restrictions imposed on delegate expenditures. See, e.g., FEC v. Machinists Non-Partisan Political Committee, 655 F.2d 380 (D.C. Cir.), cert. den., 454 U.S. 897 (1981); FEC v. Florida for Kennedy Committee, 681 F.2d 1281 (11th Cir. 1982).

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expenditures for volunteer campaign materials that advocate their selection and their presidential candidate's. Denying delegates who form committees the right to make these expenditures on the same terms as individuals would impair one of the central policy objectives of the regulations and statutory coattails provision. That provision affords the same right to candidates and candidate committees. The opposite rule would discourage the team campaigning that Congress and the Commission seek to encourage. 2 U.S.C. 431(8)(b)(xi); 11 C.F.R. 100.7(B)(16).

2. The regulatory history confirms the applicability of the expenditure exemption to delegate committees

a. FEC December 1979 Deliberations

The history of the Commission's consideration of the regulations confirms its intention to treat expenditures of delegates similarly whether they act as individuals or committees. In a December 12, 1979, memorandum to the Commission from the General Counsel, Agenda Doc. #79-337, describing various alternatives for delegate regulations, the only distinction between individual delegates and delegate committees involved registration, reporting and contribution limits -- as in the final regulations. At that time the Commission also considered another memorandum from the Executive Assistants, Agenda Doc. #79-337-B, dated December 19, 1979. Only the section which sets forth alternatives for reporting and contribution limitations on committees distinguished between individual delegates and committees. The treatment for expenditures, other than reporting, was the same for both. From that document the Commission

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accepted the presumption that delegates' expenditures mentioning the presidential candidate were for the purpose of furthering delegate selection. It never proposed to disqualify delegates campaigning as a group from using the exemption.14/

b. FEC January 1980 Deliberations

After enactment of the coattails provision of the Act, the General Counsel sent another memorandum with proposed regulations to the Commission, Agenda Document #80-43. In it the General Counsel said:

> Since the phrase 'candidates for any public office' is broad enough to include delegates, the proposed regulations of 11 C.F.R. 110.14(d)(2) incorporate that exemption in lieu of the $1,000 threshold.

Nowhere did the memorandum draw a distinction between individual delegates and committees. And, under the analysis set forth in the memorandum, delegates would have a statutory right to the coattails exemption. The Commission voted 5-0 on January 31, 1980, to follow the standard set forth in H.R. 5010, 96th Cong., 1st Sess., July 30, 1979, for candidates in drafting its delegate regulations. FEC Meeting, January 31, 1980, Transcript at 28.15/

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14/ The discussion at the December 18, 1979, Commission meeting focused on individual delegate activity which would serve as the "base" for permissible delegate expenditures. FEC Meeting, December 18, 1979, Transcript at 11. The Commission intended to deal with contribution limits and reporting requirements separately.

15/ It is unclear, however, whether this decision was based on the conclusion that delegates fall within the meaning of "candidate for any public office," see Agenda Document #80-43 at 3, or a determination to follow this standard by analogy.

Finally, during the discussion of this memorandum at the meeting of January 31, 1980, there was no mention of treating expenditures by delegate committees differently from expenditures by delegates individually. The only distinctions made by anyone at that meeting related to reporting requirements. The Commission voted unanimously to treat delegates identically to candidates under the coattails provision, Transcript at 28, which reinforces the applicability of the expenditure exemption in Section 110.14(d)(2) to delegate committees.16/

3. There is no basis for treating delegates who spend individually differently from delegate committees

Nothing in the regulations, their objectives and history, or the analogy to the coattails provision even suggests a reason for treating delegate committees differently for expenditure purposes.17/ If the Commission had a policy reason for making that

16/ One of the concerns expressed by Commissioners at this meeting was that delegates who were also candidates for state, local or federal public office should not be treated differently than other delegates. FEC Meeting, January 31, 1980, Transcript at 24. Many Mondale delegates are in fact candidates who would be entitled to make coattails expenditures both as a candidate and as a delegate.

17/ Moreover, any construction of 11 C.F.R. Section 110.14 that interferes with delegates' freedom of association by treating individual delegates and delegate committees disparately would pose other serious constitutional questions. Such different treatment would have to meet the "exacting scrutiny applicable to limitations on core First Amendment rights of political expression." Buckley v. Valeo, 424 U.S. 1 44-45 (1976). Yet, no compelling reason exists to justify a distinction between expenditures by individual delegates and delegate committees.

Complainant's suggestion that delegate committees pose a greater threat is unfounded. In fact, the potential for evil of individual delegate expenditures would be more severe because of the absence of disclosure and contribution limits (other than the

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distinction, it has never articulated it. It never even hints at a policy reason in the Advance Notice of Proposed Rulemaking, the Notice of Proposed Rulemaking, the Explanation and Justification of Regulations, or the Commission's summary of the regulations in the FEC Record.

Indeed, as a policy matter it is far preferable to encourage delegates to form committees for two reasons. First, delegate committees must register and report while individual delegates need not. Thus, under the regulations individual delegates may raise and spend unlimited amounts on volunteer campaign materials without any disclosure. Second, contributions to 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. As noted, if MPC had intended a scheme to evade the contribution and expenditure limitations, as Complainant suggests using individual delegates would have been a far more effective path. Instead, MPC intentionally encouraged the path that would provide full public disclosure.

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(footnote continued)

$25,000 annual limit) on individual delegates. The only other provisions of the Act which allow individuals greater freedom than committees are all premised on an individual's use of his or her own funds. Since the delegate regulations allow individual delegates to accept contributions, the basic premise of this distinction is lacking.

In addition, Complainant's construction of Section 110.14 would raise questions concerning the adequacy of the Commission's notice and therefore the enforceability of the regulations so interpreted.

Moreover, the exemption at issue is extremely narrow. It only allows delegates, individually or as committees, to produce volunteer campaign materials. It does not exempt powerful and expensive public media advertising.[18/] The approach to public advertising preserves the broad public interest in reducing the untoward impact of excessive contributions on federal elections. At the same time the narrow exemption for a small percentage of expenditures promotes traditional ideals of participatory democracy. Complainant's contention that allowing delegate committees the same freedom as individual delegates would render the limitations on candidate expenditures meaningless is an outlandish exaggeration of the impact of the exemption.

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18/ Expenditures by delegates and delegate committees for public media advertising which include information about a presidential candidate are treated as in-kind contributions to the candidate unless they are made without the cooperation, consultation or request of the presidential candidate. 11 C.F.R. Section 110.14(d)(2)(ii).

II. DELEGATE COMMITTEES ARE NOT AFFILIATES OF EACH OTHER OR OF MPC

Complainant apparently believes that even if it has erred in its first argument -- as it clearly has -- it has a second argument to which it can turn in its determined effort to discredit MPC. Specifically, Complainant makes the sweeping contention that all of the delegate committees are affiliated with each other and with MPC. As shown below, in support of this contention Complainant begins by citing the wrong legal standards and follows by failing to show any facts that reflect affiliation.19/

19/ This complaint is substantially based on inaccurate and undocumented newspaper articles, particularly as to the allegations concerning affiliation. These articles do not provide a sufficient basis for consideration as evidence in a Commission enforcement action.

On November 15, 1979, the Commission adopted a policy set forth in Commission Memorandum No. 663 ("the policy") concerning the opening of compliance actions on the basis of newspaper accounts. 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. Policy at 2. Under the regulations, a complaint must set forth a "clear and concise statement of the acts which are alleged to constitute a violation." 11 C.F.R. Section 111.2(b)(2). Where the only statement of facts is that contained in a news report, the Commission noted that an article must be "substantive in its statement of fact." Policy at 3. By contrast, the news accounts upon which this complaint are based contain speculative, conclusory or innocuous quotes which do not set forth a substantive statement of facts. Moreover, where the excerpts do state specific facts which would constitute a violation, those facts are inaccurate. It is precisely because of these types of undocumented accusations and inaccurate factual assertions that the Commission adopted a policy of careful scrutiny of complaints based solely on newspaper articles.

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A. The Correct Legal Standards

Complainant has confused three distinct portions of the FEC regulations: those on affiliated committees, those on independent expenditures and those on delegates.

First, with respect to affiliation, the governing statutory provision states that for the purpose of the Act's contribution limitations ". . . all contributions made by political committees established or financed or maintained or controlled by...[the same] person . . . shall be considered to have been made by a single political committee. . . ." 2 U.S.C. Section 441a(a)(5). Thus, the affiliation provisions focus on the relationship between committees, treating committees determined to be affiliated as one entity for purposes of contribution and expenditure limits.

Second, in contrast, the independent expenditure provisions look to specific expenditures to determine whether they were made "in cooperation, consultation, or concert with, or at the request or suggestion of, a candidate." 2 U.S.C. Section 441a(a)(7). If such cooperation exists, the expenditures fail as independent expenditures and are contributions subject to limitation. However, committees do not become affiliated simply because they have cooperated on expenditures. See MUR 950.

Third, in the delegate regulations the Commission sought to accommodate the connection between a presidential candidate and his or her delegates while still maintaining the integrity of the competing regulatory threads governing independent expenditures and affiliation of committees. To this end, the regulations

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incorporate the coattails provision and permit delegates to make unlimited expenditures in cooperation with each other for volunteer campaign materials that refer to the presidential candidate. Hence, although such expenditures would not qualify as independent, they are not subject to any contribution limit. Moreover, the fact that a delegate committee makes expenditures for volunteer campaign materials in cooperation with MPC cannot be used as an indicia of affiliation.

Simply put, the only standard for affiliation of committees is that contained in Section 441a(a)(5), which requires that in order to be deemed affiliated the committees in question must be established, financed, maintained or controlled by the same person. This standard must be interpreted in a manner consistent with the delegate regulations. Thus, the fact that delegate committees have prepared volunteer campaign materials in cooperation with the presidential candidate cannot be used to prove affiliation.

Complainant's confusion in this respect can be seen, for example, in its reference to cooperation between MPC and delegate committees on volunteer campaign materials as evidence of affiliation. Complaint at 12. This approach is flatly incorrect. It ignores the distinction between the affiliation provisions on the one hand, and on the other hand, the independent expenditure provisions, as modified by the delegate regulations.

In interpreting the general statutory standard set forth in Section 441a(a)(5), the Commission in its regulations at

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11 C.F.R. Section 100.5(g)(2)(ii) has prescribed five factors to be used in determining whether committees are affiliated:

> - ownership by one committee of a controlling interest in voting shares or securities in another committee;
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> - provisions of by-laws, constitutions, or other documents by which one committee has the authority, power, or ability to direct another committee;
>
> - the authority, power or ability of one committee to hire, appoint, discipline, discharge, demote or remove or otherwise influence the decision of the officers or members of the other committees;
>
> - similar patterns of contributions by the committees in question; and
>
> - the transfer of funds between committees which represent a substantial portion of the funds of the committees in question.

What actually constitutes affiliation is a factual matter that can only be determined after a full examination of all of the relevant evidence. Complainant has mentioned only a handful out of at least 128 delegate committees. It is impossible to find reason to believe that all delegate committees are affiliated on the basis of allegations regarding a few committees.[20/]

20/ The Complainant, by not naming any delegate committees, has placed the MPC in the anomalous position of having to defend not only its own activity but also that of the committees. In the brief period allowed MPC for response to the complaint, it has not been possible for MPC to launch an investigation into each of the 128 delegate committees. Accordingly, this response is necessarily based on the review that MPC has made to counter the allegations in the complaint in the limited time allowed.

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B. The Complaint Presents No Meaningful Evidence Under the Statutory Standard or the Specified Indicia

Complainant's submissions simply fail to establish that either the statutory standard or any of the regulatory indicia are present in the relationship between the delegate committees or between MPC and the delegate committees. As shown below, there is no reason to believe that the delegate committees are affiliated with MPC or with each other.[21/]

1. Mondale Delegate Committees Were Established, Financed, Maintained and Controlled by Delegates

First, the delegate committees challenged by Complainant were established by delegates to further their own selection to the Democratic National Convention. Decisions on whether or not to set up committees were made by the delegates. Formation of the Committees, appointment of treasurers and other officers, choice of a committee name, opening of a bank account, etc. were all performed by each committee. There is nothing in the complaint to the contrary.

Second, th: delegate committees financed their own operations. MPC made no contributions to them. Further, MPC never paid the costs of establishing, administering or soliciting contributions to the delegate committees. Many committees held their own small fundraisers. (Exhibit 5) Other delegates solicited contributions from organizations to which they belong,

21/ FEC reports reflect that there is one exception: two Rhode Island committees have reported themselves as affiliated. To MPC's knowledge these are the only committees that have so considered themselves.

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such as labor organizations. Delegate committee reports also indicate that some individuals made contributions to more than one committee.[22/] The fact that there was some overlap of contributors to committees does not mean that they were financed by the same persons or groups. The Commission has never adopted such a position.

Third, delegates maintained their own committees. Although it is somewhat unclear what the distinction is between financed and maintained in the Commission's analyses of affiliation questions (see MUR 253), maintenance seems to include ongoing financial and administrative support. MPC did not provide ongoing financial or administrative support to delegate committees.

Fourth, delegates controlled the activities of their committees. Obviously, there is communication during the pre-primary election period between a presidential campaign staff and its delegates.[23/] This communication was anticipated by the Commission in its rejection of the distinction between "authorized" and "unauthorized" delegates and by its incorporation of the coattails provision into the delegate regulations. Just as with the statutory coattails provision, communication

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22/ There is no allegation that any individual gave in the aggregate more than $5,000 (which is the contribution limit permissible for <u>each</u> delegate committee).

23/ One of the first communications with delegates concerning this subject was a request that they not take PAC contributions. Exhibit 1. Despite this request, many continued to do so, thus demonstrating their autonomy. Redoubled efforts to stop the PAC money were focused on requesting unions not to make the contributions, since efforts to stop the delegate committees were not entirely successful.

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concerning the preparation of "volunteer" campaign materials -- even if it occurred in every instance -- does not demonstrate control. Thus, it seems clear that the Commission was aware of the level of interaction that would occur between the delegate committees and the presidential candidate committees on exempt campaign materials. If the Commission had wanted to limit this interaction, it would have subjected all delegate expenditures to the presidential campaign's limit.

There is nothing in the complaint which contradicts the fact that the decisions as to expenditures for campaign brochures and other materials were under the direction and control of the delegate committees. Rather, the complaint implies that because volunteer campaign materials mentioning Mondale were prepared in cooperation with MPC, an activity which is expressly permitted under the regulations, the delegate committees are all controlled by MPC. To argue that a committee which avails itself of coordinated activity specifically allowed under the Act becomes automatically affiliated with the coordinating committee would be absurd. This would undercut the exemption. The statutory standard for affiliation must be applied in a manner consistent with the delegate regulations. Therefore, the coordination of the preparation of exempt volunteer campaign materials cannot be used to demonstrate control.

2. The Regulatory Indicia of Affiliation Are Not Present

None of the five regulatory indicia of affiliation are present in this case. The first criterion is irrelevant since

there are no voting shares or securities of delegate committees. Similarly, Complainant does not contend, and MPC is not aware of, any provisions of bylaws, constitutions or other documents by which MPC has authority, power or ability to direct delegate committees; or by which delegate committees have authority, power or ability to direct each other.

As to the third criterion, MPC did not have the authority to hire, fire or otherwise influence the decision of officers or members of delegate committees. Moreover, to our knowledge, no delegate committees share any overlapping treasurers or other officers with any other delegate committee or with MPC.

While MPC distributed information to delegates on permissible activities, this was a far cry from exercising decision-making power over delegate committees. In early January, 1984, a memorandum was prepared by MPC Counsel on the law pertaining to delegate committees. (Exhibit 2) A similar memorandum was developed by the MPC Director of Delegate Selection. This memorandum first informed delegates that "if they so desire[d]," they could form committees. While the memorandum gave additional pointers on how best to raise and spend funds, it also specified that the delegates should develop their own fund-raising plan and design their own volunteer campaign materials. The clear import of this memorandum is that delegates have the responsibility to conduct their own activities to further their selection. (Exhibit 3) Finally, a letter was written by the Campaign Manager stating that although delegates were allowed under the law to raise and spend their own money, as Mondale

delegates, it was hoped that they would adopt a similar policy to MPC's prohibition against accepting political action committee contributions.24/ (Exhibit 1)

Before the Commission and in the media, Complainant has attempted to characterize Exhibits 1 and 3 as proof that MPC set up and directed delegate committees. When taken together, however, these memoranda actually demonstrate the efforts of MPC to inform its delegates of the relevant regulations without violating the affiliated committee rule. Exhibits 2 and 3 were intended to inform the delegates about their ability to form committees. Exhibit 1 was written by MPC's campaign manager to inform the delegates about MPC's policy on PAC contributions and to encourage delegates to adopt a similar position. Exhibit 1 was written precisely because MPC could not attempt to control the decisions of committees established by delegates. Similarly, Exhibits 1 and 3 did no more than set forth the policy of MPC, while informing delegates of what the Commission's regulations permitted. MPC left the actual decision fully in the hands of the delegate. To suggest now that these memoranda in fact indicate MPC's decision-making authority over the committees is to distort MPC's good faith efforts to follow the Commission's policies. On the contrary, the memoranda show that MPC gave advice, not direction, on fundraising and legal requirements in a general packet of information, not tailored to any one committee.

24/ MPC could not exercise authority over delegate committees by ordering them not to accept PAC contributions.

In some instances, these memoranda were given to delegates as they were slated. In others, they were provided by Campaign personnel in Washington or in the field to the treasurers of delegate committees after their formation. In many instances, the memoranda were requested by individual delegates, their attorneys or committee treasurers. MPC does not know how many delegate committees actually received these materials.

The only other information put forth by Complainant that even bears on this indicia of authority to influence is the fact that some former MPC field workers, both volunteer and paid staff, subsequently became volunteers for delegate committees. MPC had a group of volunteers who, when necessary, travelled from state to state receiving reimbursement for travel and subsistence. When the campaign shifted to the major primary states, many of these volunteers were no longer needed. A few delegate committee reports indicate that some of these individuals later did volunteer work for delegate committees and were reimbursed by those committees for travel and subsistence. Moreover, there is no evidence or even suggestion in the complaint that these volunteers performed anything other than delegate committee work or that they were reimbursed by more than one committee at the same time. At issue here is not an overlap of Committee staff with decision-making or policy-making authority. The Commission has never used as a factor indicating affiliation the fact that one committee subsequently reimbursed the expenses of volunteers formerly reimbursed by another committee.

As to the fourth criterion dealing with a pattern of similar

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contributions by the committee, reports on file at the FEC show that some delegate committees made contributions of unused funds to other delegate committees. These contributions are limited in number and do not reveal any pattern.

Finally, as to the fifth criterion, such contributions from one delegate committee to another represent an insubstantial portion of the funds of the committees involved. The FEC reports filed by the delegate committees reflect that several committees made these contributions of unused funds to other committees amounting to less than the $5,000 contribution limit.

Although MURs are not precedential, to MPC's knowledge the Commission has never found affiliation where none of the indicia prescribed in the regulations was present. In various compliance actions the Commission has considered possible indicia of affiliation not spelled out in the regulations. Nonetheless, one or more of the regulatory indicia was always present when the Commission found affiliation. See MURs 236, 253, 297, 1038, 1147, 1231, 1416, 1425/1426, 1518.

The indicia set forth in section 100.5(g)(2)(ii) of the FEC regulations are the principal guidance available in determining whether committees are affiliated. Committees wishing to avoid affiliation have the right and the obligation to rely on these regulations for that purpose.[25/] If this were not the case,

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25/ 2 U.S.C. Section 437f(b) provides that "Any rule of law which is not stated in this Act or chapter 95 or chapter 96 of title 26 may be initially proposed by the Commission only as a rule or regulation pursuant to procedures established in Section 438(d) of this title." (emphasis added)

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these regulations would become a trap for the unwary. In this instance, Complainant has simply failed to provide any evidence that gives reason to believe that any of the factors listed in Section 100.5(g)(2)(ii) are present -- either in the relationship between MPC and the delegate committees or in the relationship between the delegate committees.

C. Complainant's Other Allegations of Affiliation Not Only Go Beyond the Stated Indicia, But Are Insubstantial

In addition to the points addressed above, Complainant has set forth a number of other hyperbolic allegations. These are not articulated in the standards of the Act or the factors stated in the Commission's regulations. Contrary to Complainant's assertions, these factors only serve to demonstrate further the legal and factual paucity of Complainant's submission.

1. Provision of legal assistance

Complainant takes issue with the fact that MPC provided its delegates with assistance in complying with FEC regulations. Most delegates do not have any knowledge of the FECA, nor any access to FEC information. In fact, many were not even aware that federal law played any role in the delegate selection process. Clearly, assistance to individuals concerning the provisions of the Act and regulations governing their conduct is to be encouraged. Legal advice on compliance with the Act, moreover, is specifically exempted from the definition of contribution and

should not be used to demonstrate affiliation.26/

In fact, the Commission realized that delegates would be unaware of its regulations and might encounter difficulty interpreting them. FEC Meeting, January 31, 1984, Transcript at 38-40. In response to concerns raised by Commissioners that delegates would have a difficult time becoming aware of, and complying with, the delegate regulations, the General Counsel specifically noted the propriety of the role played by MPC in informing delegates of the regulations.

> It would seem to me that if anything they [delegates] have a greater source of knowledge.... Presidential campaigns are very anxious to try and disseminate this information to delegates.

Transcript at 40. This is precisely what MPC did --disseminate information to delegates on Commission regulations, and assist them in complying.27/

Thus, for example, Illinois compliance assistance was rendered by an MPC volunteer attorney to several treasurers of delegate committees with regard to the final preparation of the pre-election reports. After completing this review, someone

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26/ While provision of compliance advice was discussed in a General Counsel's report in MUR 253, there were present many other affiliation factors which are listed in the FEC regulations, e.g., common Board members, authority to control decisions, patterns of contributions.

27 Even in the area of independent expenditures where there can be no consultation or cooperation, the regulations provide that it is permissible to give an expending person upon request the Commission guidelines on independent expenditures. 11 C.F.R. Section 109.1(b)(4)(ii).

obviously addressed envelopes for the reports, using MPC's Chicago office as the return address. Complainant tries to make much of the fact that 16 envelopes were received by the FEC all with the same handwriting and with the MPC office as the return address. Complaint 11, 12. To our knowledge, each of those committees operated solely within its own congressional district. There is no significance to the fact that the reports were mailed from MPC Chicago offices. Public policy clearly militates against use of this circumstance to show affiliation, where it occurred as the result of a volunteer lawyer rendering compliance assistance to delegate committees.[28/]

2. Encouraging grass roots activity

In a similar vein, Complainant contends that MPC's "encouragement" of delegates to establish their own committees is tantamount to establishment of those committees by MPC. A newspaper account quoting an MPC official as stating that the campaign would continue "encouraging" the formation of the delegate committees is twisted to mean that the campaign is "behind the

28/ Complainant also emphasizes the fact that in Illinois, twelve of the delegate committees used the same printer. It is MPC's understanding that these committees, in order to save money on the volunteer campaign materials they were preparing, consulted with MPC and with each other. The delegate committees determined to use the same vendor to print a brochure with a general format and one panel varied to include information on each of the individual delegates. See Exhibit 6. Thus, it does not follow that because these committees conferred with each other and with MPC to obtain more economical printing, they are affiliated.

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establishment" of the committees.29/ (Complaint at 9, 10) Moreover, this contention flatly conflicts with the Commission's policy expressed in its Explanation & Justification of the delegate regulations to the effect that "similar [grass roots] activity in the delegate selection process should be encouraged." 1 Fed. Elec. Camp. Fin. Guide (CCH)¶864 at 1561-7. Resort to this type of legerdemain reflects the shallowness of Complainant's evidence.30/

3. Contributions to delegate committees

Complainant cites to a newspaper report quoting an MPC official as stating that MPC is "supportive" of the delegate committees. This quotation is distorted into a statement that MPC is encouraging contributions to the delegate committees. Complaint at 14. The quotation simply is not evidence that MPC is encouraging contributions to the delegate committees.

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29/ The complaint draws conclusions concerning the meaning of the word "encourage" that the Commission has specifically declined to draw. In AO 1979-80, the Commission declined to answer a question concerning independent expenditures in opposition to a candidate where the request stated that the independent committee wanted to "encourage" another candidate to seek election to the same office. The Commission's response was that the factual situation set forth was too vague.

30/ Another example is Complainant's distortion of legitimate grass roots activity by delegate committees in Pennsylvania as taking over entire sections of MPC's operations and as evidence of affiliation. In fact, it was MPC's strategic decision to focus on candidate appearances and paid political advertising in a primary state so populous as Pennsylvania.

Complainant also seeks to use as evidence of affiliation a statement allegedly made by David Ifshin, General Counsel for MPC that "we have been pioneers in delegate expenditures." Mr. Ifshin was merely referring to the concerted effort MPC had made to disseminate information about the new delegate regulations and to insure compliance with them.

Complainant takes note of the fact that many of the PAC contributions to delegate committees came from out-of-state and asserts that "such contributions cannot possibly be construed as local support for local delegates." (Complaint at 25.) Complainant again distorts facts which have a simple and logical explanation. Many Mondale delegates are union members and some received contributions from their unions' PACs. Since it is generally the international unions that operate PACs, such contributions will thus normally arrive from out of state.31/ In any event, this allegation is a red herring. The issue under the delegate regulations is not the origin of contributions to delegates, but whether delegate expenditures actually further the selection of the delegates. Presumably, then, their activities should be aimed at the voters who will select them. There is no evidence in the complaint that delegate committees did not do this.

III. DELEGATE COMMITTEE FLYERS SUPPORTING MONDALE ARE NOT IN-KIND CONTRIBUTIONS TO MPC

Complainant attaches five campaign flyers to its complaint

31/ It is ironic that Complainant uses PAC contributions as evidence of the affiliation of delegate committees when MPC sought to have delegate committees follow Mondale's policy of not accepting PAC contributions. Exhibit 1.

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and argues that these flyers are in-kind contributions to MPC.32/ In fact, none of the flyers are contributions. Many delegate committees sent copies of their literature to the Committee. This sample literature demonstrates that a few randomly collected flyers cannot be used to reach the conclusion that all delegate committee activity serves no purpose other than to benefit Mondale. Exhibit 7.33/

Three of the flyers clearly fall within the exemption for volunteer campaign materials. The flyer produced by the At-Large Delegates for Mondale in New York (Exhibit D to original

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32/ Complainant was able to identify who paid for these pieces of literature only because of the disclaimer. The delegate committees which printed these flyers are not even required to include a disclaimer on it. 11 C.F.R. Section 110.11(a)(1) only applies to express advocacy in general public advertising, and not to brochures which are distributed through volunteer activities. Yet MPC which has a policy of encouraging full public disclosure, suggested in its guidelines for compliance that all literature printed by delegate committees include disclaimers. Arguably, the only campaign materials printed under the volunteer exemption which must have the disclaimer are yard signs which, although not general public advertising within the meaning of 11 C.F.R. Section 110.14(d)(2)(i), are general advertising under 11 C.F.R. Section 110.11(a).

33/ The Complaint is very confused on the question of in-kind contributions. Complaint at 22-23. It argues that all Mondale delegate committees are affiliated with each other because they were set up by MPC. For the purposes of in-kind contribution limits, the complaint then argues that the delegate committees share a $1,000 contribution limit to MPC. However, if their argument was correct that they are affiliated because they were established by MPC, they would not be subject to any limit on contributions to MPC, since all of their expenditures would be expenditures subject to MPC's limit.

complaint)34/, the flyer produced by Mondale Delegates - D.C. Committee (Exhibit D to amended complaint), and the letter prepared by the At-Large Delegate Mondale Committee in Wisconsin (Exhibit C, p. 5, to amended complaint)35/ all promote both Walter Mondale and the delegates responsible for the literature. Complainant suggests that these three pieces of literature do not qualify as exempt volunteer campaign materials because the primary purpose of the literature allegedly was to promote the Mondale candidacy. Section 110.14(d)(2)(1) does not specify what portion of volunteer campaign materials must be devoted to the delegates and what portion may be devoted to the candidate. The issue is whether the literature furthers the selection of delegates. In Wisconsin and New York, the At-Large Delegates who issued the literature are not directly elected and their selection as delegates depends entirely on the success of the presidential candidate.

In any event, Congress rejected the notion that a purpose test be applied to campaign materials produced under the coattails exemption. H.R. Rep. No. 96-422, 96th Cong., 1st Sess. 10

34/ Contrary to Complainant's assertions, the piece of literature attached to the complaint from the D.C. Delegate Committee (Exhibit D to amended complaint) appears to exemplify what Congress envisioned in the coattails exemption.

35/ Note that the letter from Governor Earl, who was an At-Large delegate candidate, was produced and distributed without any consultation with MPC.

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(1979). Congress specifically left to the candidate preparing the campaign materials the determination of what best furthers his or her election. Similarly, in the delegate regulations, it must be left to the discretion of the delegate to determine what best further his or her selection. As can be seen by an examination of a sampling of delegate committee literature, individual delegate committees placed varying emphasis on Mondale and his policies.

The other two flyers in Wisconsin (Exhibit C, page 2 and 4 of amended complaint) demonstrate the absurdity of Complainant's attempt to create violations by randomly collecting campaign literature. It is our understanding that students at the University of Wisconsin working as volunteers with the Mondale campaign, prepared and distributed literature which was paid for by MPC to be distributed on their campus. Subsequently, other students who had volunteered to assist the Wisconsin At-Large Delegate Committee saw these flyers and asked the MPC office for copies which they could distribute on behalf of the delegate committee. MPC declined their request and told them that the delegate committee should prepare their own literature. Instead, the students simply went back to campus, found old copies of MPC literature and had them reprinted with the At-Large delegate disclaimer. Clearly, these flyers were produced without the knowledge or permission of the Mondale campaign. Under the Commission's independent expenditure regulations, the amounts spent on these flyers are not an expenditure attributable to MPC. 11 C.F.R. 109.1(d)(1). Thus, these flyers can not be treated as

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in-kind contributions.

Complainant is essentially asking that the Commission investigate every piece of literature produced by any delegate committee in order to determine whether any in-kind contributions were made. The exhibits attached to the complaint do not provide reason to believe that delegate committee expenditures for campaign materials were in-kind contributions to MPC and not permissible expenditures for volunteer campaign materials.

CONCLUSION

Complainant has launched a concerted attack on the Commission's delegate regulations and the legitimate activities of the Mondale delegate committees. The attack rests on a fundamental misunderstanding of the applicable regulations and legal principles. This misperception of the correct legal standards spread quickly to the media. Unfamiliar with the regulations and practices of the Commission from the outset, the media largely has viewed the delegate committees through the prism of the campaign financing issue that dominated the last presidential campaign: independent expenditures.

The misperception was no accident. Complainant intended to inflame the press, the public, and the Commission about legitimate delegate committee activities. Thus, news stories that purported to "discover" facts quickly proliferated and suggested something improper about the activities of the delegate committees.

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As the Act stood in 1976, Presidential candidates had to curtail drastically the spending needed to drive volunteer efforts. The Commission, following Congress's lead, took a thoughtful step to remedy an unintended and untoward effect of the law. The delegate regulations provide a vehicle for increased political participation by delegate committees through grass roots activity. The Commission should not allow a politically motivated complaint to undercut this welcome and needed initiative.

For the reasons set forth in this response, the Commission should find no reason to believe a violation of the Act has occurred.

Respectfully submitted,

David M. Irshin
General Counsel

Carolyn U. Oliphant
Deputy General Counsel

Patricia A. Fiori
Of Counsel

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EXHIBITS

1. Letter from Campaign Manager.	Exhibit 1
2. Memorandum from Campaign Counsel.	Exhibit 2 pages 1-6
3. Memorandum from Director of Delegate Selection	Exhibit 3 pages 1-2
4. Statement of Michael S. Berman	Exhibit 4 pages 1-3
5. Delegate Committee fundraiser invitation	Exhibit 5
6. Volunteer Campaign Materials	Exhibit 6 pages 1-4
7. Volunteer Campaign Materials	Exhibit 7 pages 1-12

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PRINTED IN U.S.A.
C-213-31

Mondale for President
2001 Wisconsin Avenue, N.W.
Washington, D.C. 20007
Telephone: 202-625-1984

MONDALE

EXHIBIT 1

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 Beckel
Campaign Manager

Paid for by Mondale for President, Inc.

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Mondale for President
2301 Wisconsin Avenue, N.W.
Washington, D.C. 20007
Telephone: 333-333-1000

MONDALE

EXHIBIT 2
page 1

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

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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.

I. 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.

EXHIBIT 3
page 1

Mondale for President
2501 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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2301 Wisconsin Avenue, N.W.
Washington, D.C. 20007
Telephone: 333-333-1000

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.

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EXHIBIT 4
page 1

STATEMENT OF MICHAEL S. BERMAN

1. My name is Michael S. Berman. I reside at 2801 New Mexico Avenue, Washington, D.C. 20007.

2. I have served as treasurer of the Mondale for President Committee, Inc. ("MPC" or "Committee"), the principal campaign committee of Walter F. Mondale's 1984 presidential campaign, continuously since its formation on January 3, 1983.

3. As treasurer, my responsibilities include overall management of the Committee's finances and financial policies.

4. I have reviewed the Complaint filed with the Federal Election Commission on April 6, 1984, entitled Americans with Hart, Inc. against Mondale for President Committee, Inc. This statement is made in support of the Committee's position that there is no reason to believe that a violation of the Federal Election Campaign Act has taken place.

5. In 1983, as treasurer of MPC, I was aware of the Commission's regulations on permissible activities by delegate candidates which were also summarized on the front page of the December 1983 "FEC Record."

6. Thereafter, the Committee decided to inform candidates for delegate supporting Mondale of the FEC's guidelines. On January 12, 1984, a letter was signed by the Committee's campaign manager to precede two other memoranda made available to individuals slated as Mondale delegates. This letter, a copy of which is appended as Exhibit 1 to this statement, stated that delegates were permitted by the FEC to make certain expenditures to further their own candidacies. It also stated that Walter F. Mondale had

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decided not to accept money from political action committees and urged that delegates similarly refrain from accepting PAC funds.

7. The first memorandum distributed with the letter was prepared by the Committee's counsel. This memorandum, attached as Exhibit 2 to this statement, offered basic compliance guidance on the complexities of FEC reporting as well as on the FEC's regulations governing delegate expenditures.

8. A second memorandum was prepared by the Committee's director of delegate selection, attached as Exhibit 3 to this statement. The general purpose of this memorandum was to inform the candidates for delegate that responsibility for the delegate activities, including fundraising, was exclusively that of the delegate candidates.

9. The Commission's regulations stated that individual delegates could raise and expend unlimited amounts of money (subject only to the $25,000 annual limit on contributions from individuals) without registering with the FEC or incurring any disclosure requirements. The Committee decided not to discuss this in the information sent out, since we believe that political contributions and expenditures should be fully disclosed.

10. Since the decision by delegates to establish committees was that of the delegates themselves, the Committee's policy was to limit its involvement in this area to informing the delegates of the FEC's regulations and providing compliance assistance where requested. All relevant personnel of the Committee were informed of this policy and instructed to abide by it.

11. Where delegates established committees, and where there was contact with MPC field staff, it was the policy of the campaign

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to limit such contact between our field staff and delegate committees to conferring with delegates on the preparation of materials to be distributed by volunteers, such as palm cards, brochures or yard signs.

12. The policy of the Committee in notifying its delegates of their rights under the Commission's regulations was premised on the Committee's interest in seeing that delegates pledged to Mondale avail themselves of the opportunities to get selected as well as our belief that grass roots activity in the delegate selection process coupled with full public disclosure should be encouraged.

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

Michael S. Berman

Executed on April 19, 1984.

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EXHIBIT 5

MONDALE '84

A Salute to Walter Mondale's
District of Columbia Delegate Candidates

FRIDAY, APRIL 6, 1984

THE WASHINGTON CONVENTION CENTER
6:00 p.m. - 9:00 p.m.

hors d'oeuvres
cash bar

$15.00 per person

Checks are payable to MONDALE DELEGATES D.C. COMMITTEE

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Support the Delegates Who Support Mondale

The 15th District Mondale Slate

TIM LEE HALL, A long-time resident of Dwight. Served the 15th District as United States Congressman in the 94th Congress.

BARBARA J. SIKES, Resident of Kankakee where she has been a school social worker for almost 20 years.

THOMAS D. WHALEN, Lives in Bloomington and is active in the Laborers International Union. He is also on the Executive Board of the McLean County Democratic Party.

LUELLEN W. LAURENTI, an instructor at Illinois State University in Normal where she lives. McLean County Democratic Chairwoman. Board Member, National Organization for Women (NOW).

Alternate

CARYL E. WADLEY-FOY, Resident of Bradley and employed at Shapiro Developmental Center. She is president of Local 29 of the American Federation of State, County Municipal Employees (AFSCME).

On March 20th Vote for WALTER MONDALE FOR PRESIDENT

AND THE MONDALE DELEGATES

VOTE FOR 4

- ☒ TIM LEE HALL (MONDALE)
- ☒ BARBARA J. SIKES (MONDALE)
- ☒ THOMAS D. WHALEN (MONDALE)
- ☒ LUELLEN W. LAURENTI (MONDALE)

MONDALE ALTERNATE

VOTE FOR 1

- ☒ CARYL E. WADLEY-FOY (MONDALE)

MONDALE

ILLINOIS FOR MONDALE

Chicago
[illegible]

Springfield
600 N. East Street
Springfield, IL 62702
(217) 522-9850

8 5 0 [illegible] 4 9

WALTER MONDALE

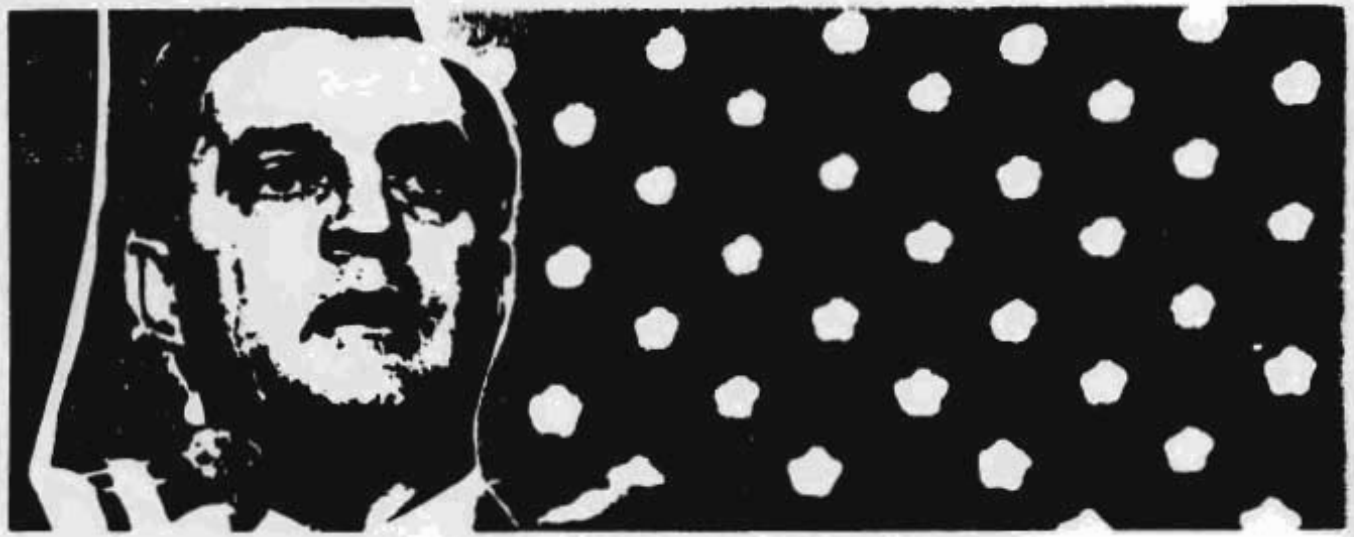
EXHIBIT 6 -- front



THE EXPERIENCE TO KNOW WHAT WE NEED TO CHANGE... THE STRENGTH TO MAKE IT HAPPEN

"America must be number one again 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

EXHIBIT 6 -- back



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.





Support the Delegates Who Support Mondale

The 19th District Mondale Slate

LARRY R. STUFFLE, State Representative from the 104th Legislative District. Resident of Danville.

SHIRLEY STILLINGER, Resident of Urbana where she is Executive Director of YWCA. Until She is also a member of the Champaign County Board.

SCOTT SHEARER, Resident of Villa Grove and Legislative Aide to United States Senator Alan Dixon.

LEE ANN CONNELLY, Resident of Charleston where she is an elementary school art teacher in the Charleston school system.

SHARON WALKER, Community activist from Georgetown and President of Local 127 of the United Auto Workers.

Alternates

"ANDY" TURNER, Viking Iron leader at the Olin Chemical and Atomic Workers Union. Resident of Marshall.

DIANE K. PARHAM, Kindergarten teacher in Robinson where she resides. She is also an active member of the Illinois Education Association.

On March 20th Vote for WALTER MONDALE FOR PRESIDENT

AND THE MONDALE DELEGATES

VOTE FOR 5

- ☐ LARRY R. STUFFLE (MONDALE)
- ☐ SHIRLEY STILLINGER (MONDALE)
- ☐ SCOTT SHEARER (MONDALE)
- ☐ LE ANN CONNELLY (MONDALE)
- ☐ SHARON WALKER (MONDALE)

MONDALE ALTERNATES

VOTE FOR 2

- ☐ WAYNE ANDERSON "ANDY" TURNER (MONDALE)
- ☐ DIANE K. PARHAM (MONDALE)



ILLINOIS FOR MONDALE

Chicago
[illegible]

Springfield
[illegible]

Paid for by the 19th District [illegible]

WALTER MONDALE

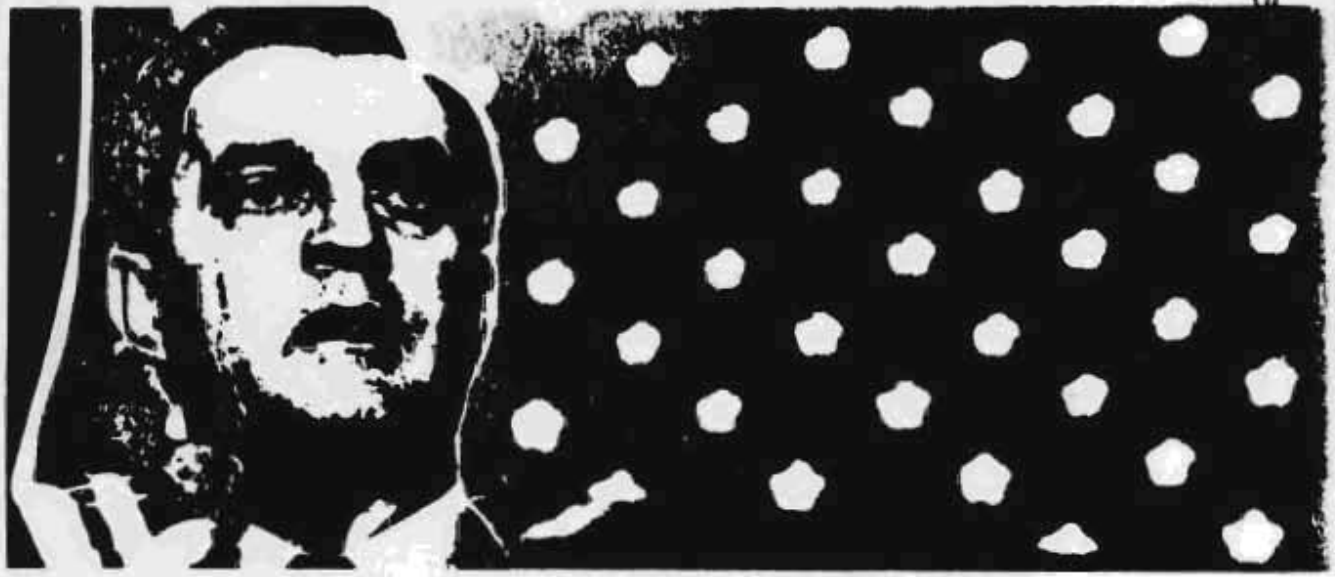
EXHIBIT 6 -- front



THE EXPERIENCE TO KNOW WHAT WE NEED TO CHANGE... THE STRENGTH TO MAKE IT HAPPEN

"America must be number one again 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

EXHIBIT 6 -- back



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 [illegible] to give a break to the [illegible] 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.

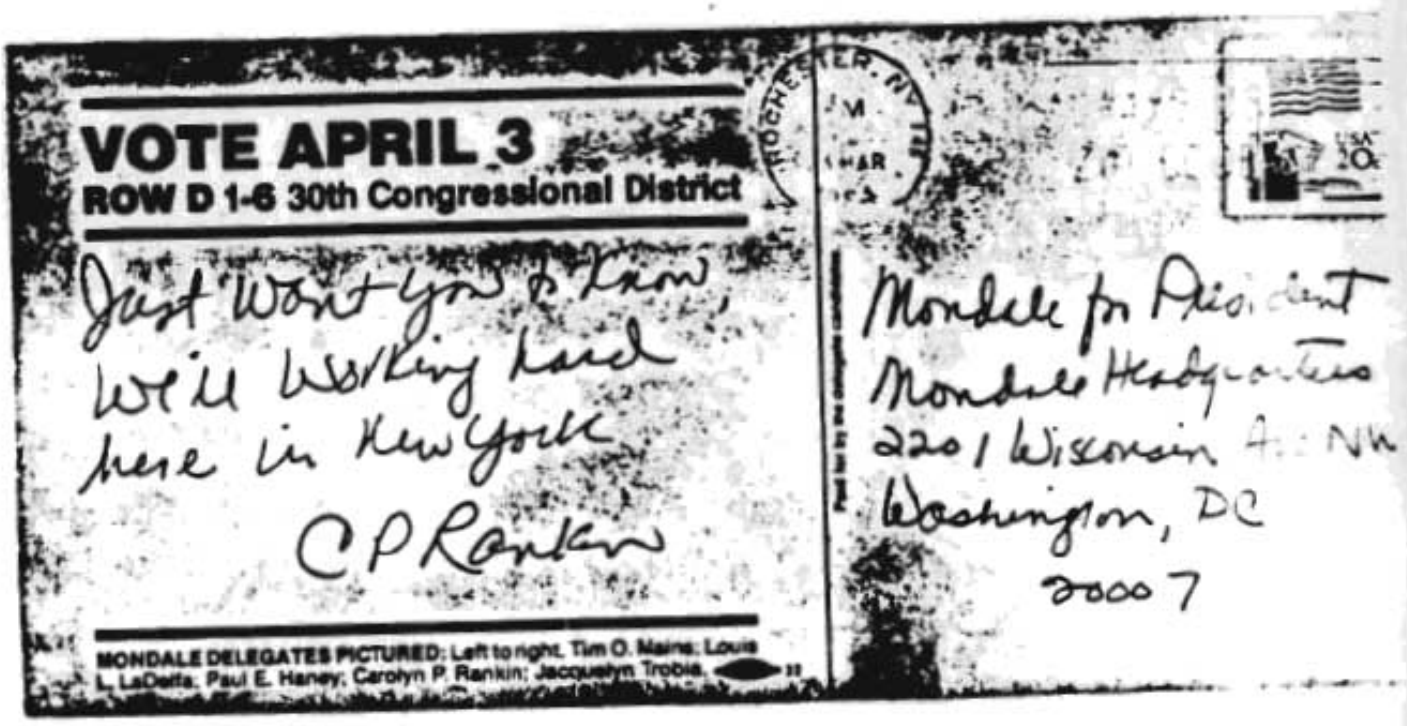


EXHIBIT 7
page 1

front



back



8504056552

front

EXHIBIT 7
page 2

back

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.



8504056553

LET'S ELECT 16th 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 ...
(page 1)

11 MONDALE

2. Delegates Committed To *MONDALE* .....
(page 3B)

Sandra Friedman	(Mondale)	47
Nicki E. Grossman	(Mondale)	48
Fred Lippman	(Mondale)	49
Frank C. Ortis	(Mondale)	50

3. Alternate Committed To *MONDALE* ....
(page 5B)

Joel V. Alesi	(Mondale)	84

Paid for by Mondale 16th District Delegate Committee

The Ballot is Unusual Here's How To Make your Vote Count for Mondale's 5 Delegates and Two Alternates:

Page 1.
Punch Hole to Right of 13 in Pinellas & Pasco

[illegible]	6→
[illegible]	7→
[illegible]	8→
[illegible]	9→
[illegible]	10→
[illegible]	11→
[illegible]	12→
WALTER MONDALE	13→

Page 3.
Punch Holes to Right of 45, 46, 47, 48, 49 in Pinellas
Punch Holes to Right of 46, 47, 48, 49, 50 in Pasco

			Pasco County Ballot Numbers
[illegible]	(HOLLINGS)	42→	
[illegible]	(JACKSON)	43→	
[illegible]	(JACKSON)	44→	
WILLA L. CARSON	(MONDALE)	46→	46→
GABRIEL CAZARES	(MONDALE)	46→	47→
GAIL P. HUSBANDS	(MONDALE)	47→	48→
JOHN SABIN	(MONDALE)	48→	49→
DAVID G. SUTTLE	(MONDALE)	49→	50→
[illegible]	[illegible]	50→	

Page 6.
Punch Holes to Right of 104 & 105 in Pinellas & Pasco

[illegible]	(ASKEW)	99→
[illegible]	(ASKEW)	100→
[illegible]	(BRANSTON)	101→
[illegible]	(GREEN)	102→
[illegible]	(GLENN)	103→
MARILYN A. HACKWORTH	(MONDALE)	104→
PHILIP MISHKIN	(MONDALE)	105→

You Must Vote on Three Pages To Vote for Mondale In Congressional Dist. 9.

FOR HILLSBOROUGH COUNTY BALLOT AND PAGE NUMBERS DIFFER.

What Walter Mondale has Done is more Exciting than what any other candidate Can Say:

For Minorities:

- Successfully lobbied the 1949 national convention of Young Democrats for a civil rights resolution "calling for an end to segregation in the military and in interstate travel, the abolition of the poll tax, and the passage of anti-lynching laws."
- As Minnesota Attorney General, led first Civil Rights demonstration in St. Paul in '62.
- Co-sponsored '65 Voting Rights Act and led fight to extend the Act in '70 and '75.
- Introduced tough fair housing legislation in '67 and '68, and beat filibuster to pass this law.

For Seniors:

- Co-sponsored and led fight for Medicare in '65.
- Fought for Supplemental Security Income program, Title XX Social Services programs and Legal Services Corporation.
- As Vice President, worked for tough health care cost containment and for extending mandatory retirement age to 70.

For Women and Children:

- Original co-sponsor of ERA in '72 and has supported it ever since.
- Led the first major effort to provide day-care centers for the children of working mothers in '71. Voted funding for day care in '72 and '78.
- Major sponsor of the Women's Educational Equity Act of 1974.
- Firmly supports pay equity for all women workers.

For Labor:

- As Vice President, fought hard for Labor Reform bill in 1978.
- Proposed $9 billion job program in '75 recession. Twice voted to override Ford's vetoes of jobs programs in '76.

For Us All:

- Advocated Tax reform in 1971, 1975 and 1976 by seeking to close corporate loopholes.

3

Paid for by the Ninth Congressional Delegates for Mondale

Introducing

WALTER MONDALE'S DELEGATE SLATE

EXHIBIT 7
page 3 -- front

In the Ninth Congressional District
Democratic Primary • March 13

THE 5 DELEGATE CANDIDATES

Willa L. Carson
Retired Nurse

Gabriel Cazares
County Commissioner

Gail P. Husbands
Teacher

John Sabin
Engineer

David G. Suttle
Teacher

THE 2 ALTERNATE CANDIDATES

Marilyn A. Hackworth
Small Business Owner

Philip Mishkin
Retired UAW Machinist

They are People who care about our Communities.

Vote for them to Vote for Mondale on March 13.

8 5 0 4 0 5 5 6 5

THE MONDALE DELEGATES AND ALTERNATES:

Democratic Primary • March 13

The Delegates

Vote for them on ballot page 3. Vote for five.

EXHIBIT 7
page 4 -- back

Willa L. Carson



Pinellas Ballot #45
Pasco Ballot #46

- President, Progressive Democratic Club
- "Woman of the Year", Clearwater Community Service Organization
- Member, Pinellas Unified Personnel Board
- Member, 6th Judical Nominating Committee
- Nursing skills Facilitator, St. Pete Jr. College, Division of Nursing
- Volunteer Nurse, American Red Cross
- Secretary, Pinellas Democratic Executive Committee
- Visiting Nurse, New York, Retired

Gabriel "Gabe" Cazares



Pinellas Ballot #46
Pasco Ballot #47

- Pinellas County Commissioner
- Clearwater Mayor, 1978-1981
- Secretary, Tampa Bay Regional Planning Council
- Member, Florida State Commission on Hispanic Affairs
- Board of Governors, Bay Area Chapter, National Conference of Christians & Jews
- Life member, NAACP, Golden Heritage
- National Association of Counties, Communities on Employment/Labor Benefits, Community Development and Human Services
- Member of Health Council of Pasco/Pinellas, Inc.
- USAF, Lt. Colonel, Retired

In Pasco, Call 848-1385
In Pinellas, Call 446-1136

Husbands



Pinellas Ballot #47
Pasco Ballot #48

- Vice-Chair, Pinellas Classroom Teachers Association Governmental Relations Committee
- Executive Board member, Pinellas Classroom Teachers Association
- National Educational Association, Resolutions Committee and Women's Caucus Group
- Clean-Up '84, Florida Environmental Campaign
- Past Member, NEA Board of Directors
- Fellowship Committee, St. John's Episcopal Church, Clearwater
- First Grade Teacher for past 19 years

John Sabin



Pinellas Ballot #48
Pasco Ballot #49

- Pinellas County Democratic Party State Committeeman
- State Democratic Party Central Committee
- Past Chairman, Florida Democratic Party Blue Ribbon Committee on Rules and Reform
- 1976 Vice Chairman of Carter for President Campaign, Pinellas
- North Pinellas Democratic Club, Past Chairman
- Pinellas Chairman, Mondale for President Campaign
- Senior Reliability Engineer, Honeywell

David G. Suttle



Pinellas Ballot #49
Pasco Ballot #50

- President and Fulltime Business Agent, Pasco Classroom Teacher's Association
- Area Vice President, Florida Education Association United
- Chairman, American Federation of Teachers Education Reforms Workshops
- Pasco County Democratic Executive Committee
- Member, New Port Richey Kiwanis Club
- Fifth Grade Teacher, eight years

The Alternates

Vote for them on page 6 of the Ballot.
Vote for two.

Marilyn A. Hackworth



Pinellas/Pasco Ballot #104

- President, Upper Pinellas County National Organization for Women
- Executive Director, Ecollege, Adult Continuing Education Institution
- Recipient, Florida Women in Communications' ATHENA Award for Outstanding Service to Community and Profession
- Past President, Upper Pinellas Council of Human Relations
- Past Boardmember, Clearwater League of Women Voters
- Past Chairwoman, Dunedin Housing Authority
- Owner, Lyn Hackworth Gallery, Clearwater

Phillip "Phil" Mishkin



Pinellas/Pasco Ballot #105

- President, Pasco Chapter, National Council of Senior Citizens
- Member of Board, Area Agency on the Aging
- Tampa Bay Regional Planning Council Member
- State Board, Florida League of Conservation Voters
- Phonebank Coordinator, Pasco Campaign for George Sheldon
- Pasco Democratic Executive Committee Member
- Retired Ford Motors Machinist
- Retired United Auto Workers Member

The Ninth Congressional District is Pinellas County, North of East Bay Drive; all except the Eastern part of Pasco County; and the Northern and Western part of Hillsborough County.

EXHIBIT 2
page 5 -- front



L-R, TOP: John T. Ruel, Robert Macari, Thomas C. Hynes, Catheleen Kahn Healey.
L-R, BOTTOM: Lenore T. Colson, Dorothea H. Hoch, A.Jayne Powers, Stephen M. Culen.

8504056556

EXHIBIT 1
page 6 -- back

8504056557

Dear Neighbor: We Delegates

We believe that Walter Mondale is the one candidate who best embodies the ideals of the Democratic party. He is committed to rebuilding our economy, excellence in education, insuring peace in the world and restoring fairness. We hope you'll vote for Walter Mondale for President on March 20th and ask you to support us, your Mondale delegates in the 3rd Congressional District.

Thank you,

RECEIVED MAR 16 1984

THOMAS C. HYNES #56
A.JAYNE POWERS #57
STEPHEN M. CULEN #58
LENORE T. COLSON #59
JOHN T. RUEL #60
CATHELEEN KAHN HEALEY #61

Alternates

ROBERT MACARI #94
DOROTHEA H. HOCH #95

Paid for by 3rd Cong. Dist. Delegates for Mondale Comm.

CHICAGO IL 606 PM 4 MAR 1984

IL

Mondale for President
2201 Wisconsin Ave. N.W.
Washington, D.C.
20007

On April 10th Vote for

WALTER MONDALE FOR PRESIDENT

AND THE MONDALE DELEGATES

(VOTE FOR 4)

16D JAMES N. McGEEHAN (MONDALE)
19F JENNIFER G. WOLF (MONDALE)
15G SUE C. BARRETT (MONDALE)
16G JOHN T. McDONNELL (MONDALE)

MONDALE ALTERNATE

(VOTE FOR 1)

20D RAYMOND J. REGAN (MONDALE)

MONDALE

Paid for by the Mondale Delegate Team

191

MONDALE ALTERNATE

20D DEMOCRATIC Raymond J. Regan

MONDALE DELEGATES

16G DEMOCRATIC John T. McDonnell

15G DEMOCRATIC Sue C. Barrett

19F DEMOCRATIC Jennifer G. Wolf

16D DEMOCRATIC James N. McGeehan

Support the Delegates Who Support Mondale

8 5 0 4 0 5 5 6 5 3

WALTER MONDALE

EXHIBIT 7
page 7 -- front



THE EXPERIENCE TO KNOW WHAT WE NEED TO CHANGE... THE STRENGTH TO MAKE IT HAPPEN



EXHIBIT 7
page 8--
back

A Competitive America

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8 5 0 4 0 5 5 6 5 2

A Safer World

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"In this, the nuclear age of doomsday weapons, we have to do everything in our power to ensure peace. The most awesome responsibility of the President is not only to keep us strong so that we don't invite attack, but to use all of our physical and moral strength to keep the peace and spare the world from holoca
—Walter Mondale



WALTER F. MONDALE
FOR PRESIDENT
MEANS
Peace and Prosperity For America

VOTE FOR

[X] Walter F. Mondale
FOR PRESIDENT OF THE UNITED STATES

SUPPORT THE DELEGATES PLEDGED
TO WALTER F. MONDALE
IN THE 21st CONGRESSIONAL DISTRICT

FOR DELEGATES
(Vote For Six)

- [X] Charles L. Hester
- [X] Clyde Jordan
- [X] Sharon S. Perjak
- [X] Betty Donovan
- [X] Sheila O'Malley
- [X] Buddy Wayne Davis

FOR ALTERNATE DELEGATES
(Vote For Two)

- [X] Marguerite Dubbelde
- [X] Carlton J. Jones

Primary Election: TUESDAY, MARCH 20, 1984

(PAID FOR BY 21ST CONGRESSIONAL DELEGATES)

8504056560

AMERICA NEEDS
MONDALE



As President He Will Get Our Nation Moving Again . . . .

He'll Be A Truly Great President In The Finest Tradition Of The Democratic Party

SUPPORT THE DELEGATES PLEDGED
TO WALTER F. MONDALE
IN THE 21st CONGRESSIONAL DISTRICT



BETTY DONOVAN | SHEILA O'MALLEY | BUDDY DAVIS | MARGUERITE DUBBELDE | CARLTON JONES

CHARLES L. HESTER | CLYDE JORDAN | SHARON S. PERJAK

The Mondale Team.... deserves your support!

CHARLES L. HESTER



Resident of Granite City; owner-operator of Charlie's Restaurant in Granite City for 18 years. Past president of Madison County Tavern Owners. Member Granite City Elks, American Legion, Illinois and National Restaurant Assn., Veteran World War II and Korean Conflict; Lifelong Democrat; Delegate past Three Democratic National Conventions.

SHEILA O'MALLEY



Resident of Belleville; Democratic Precinct Committeewoman; Actively involved in Young Democrats of Illinois. Served as volunteer aide to 1980 Democratic National Convention in New York City. Served as Democratic voter registrar and election judge. Graduate of Eastern Illinois University in Charleston, Ill., Presently on Staff of U.S. Senator Alan J. Dixon.

CLYDE JORDAN



East St. Louis Township Supervisor. President of East St. Louis District 189 Board of Education. Publisher of East St. Louis Monitor newspaper. Chairman of East St. Louis Democratic Orgn., member of numerous social, civic, professional groups. Was delegate to 1980 Democratic National Convention. Married and father of five children.

BUDDY WAYNE DAVIS



Resident of Wood River. District Director of United Steelworkers of America AFL-CIO and vice president of Illinois AFL-CIO. Active in several community, educational, labor and governmental committees. Married and the father of eight children, was Delegate to 1972 Democrat Convention. U.S. Navy Veteran.

SHARON S. PERJAK

Resident of Granite City, serving first term as Alderwoman on Granite City Council, Democratic Precinct Committeeman, and Treasurer of the Granite City Committeemen Orgn., Member of Madison County Mental Health Citizen's Advisory Board. Employed as an Executive Secretary with Peckham, Guyton, Albers & Viets, Inc., an architectual firm.



MARGUERITE DUBBELDE

Resident of East Alton, Ill., Attended Cottey Junior College and Southern Illinois University and holds a B.S. degree in education. A teacher for 11 years, presently teaches 7th and 8th grade math and science in Wood River School District; Married and the mother of a nine-year-old son.



BETTY DONOVAN



Resident of Fairview Heights. Past St. Clair County Democratic Chairwoman. President of St. Clair County Demo Woman's Club; Past President of Caseyville Democratic Club. Member of Shiloh Eagles Aux., Ladies Aux. Ancient Order of Hibernians. Past President of St. Cyril's Mother's Club, Holy Angel's P.T.A. Mother's Club. Employed as Secretary-Bookkeeper for St. Clair County Sheriff's Office. Widow with four children.

CARLTON J. JONES



Resident of East St. Louis. Graduate of East St. Louis Sr. High School (1976) and graduate of Tuskegee Institute (1981) with a Bachelor's degree. Organizer of the East St. Louis Young Democrats. Member of the Down-State Caucus of the Illinois Young Democrats. Member of Down-State Executive Board of Illinois Young Democrats. National Treasurer of Minority Caucus of National Young Democrats.

8504056611

Democrats . . . . .

Vote MONDALE Delegates

(Vote for 4)

- **Alan J. Darion**
- **Dorothea L. Schaeffer**
- **Mary H. Schmidt**
- **Peter J. Swoboda**

Vote MONDALE Alternates

(Vote for 2)

- **Harry S. Lesher**
- **Marjorie Reppert**

Please Vote . . . .

Primary April 10, 1984

Thank You,

Paid For By Mondale Delegates Committee

8504056621

EXHIBIT 7
page 12

front

On March 20th Vote for
WALTER MONDALE
FOR PRESIDENT



PUNCH
Carol Ruth
Abrams
11th DISTRICT

MONDALE DELEGATE

VOTE DEMOCRATIC

back

RECEIVED MAR 3 1984

Ted Devine — Delegate

Hon. Walter F. Mondale:

When I met you at the Jefferson Park train station in Chicago, Illinois, you told me that you wanted me to win so that I could come to San Francisco as your delegate.

Well ! I followed your instructions and have been elected as a member of the Illinois delegation.

I look forward to seeing you at the convention.

Best wishes on the campaign trail,

Sincerely yours,

Carol R. Abrams

8504056637

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Special Executive Session)
scheduled for April 26, 1984)

MUR 1667

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for Federal Election Commission executive session on April 24, 1984, do hereby certify that the Commission decided by a vote of 6-0 to cancel the special executive session scheduled for Thursday, April 26, 1984.

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

Attest:

4-25-84
Date

Marjorie W. Emmons
Secretary of the Commission

8504050566

SENSITIVE

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

84 APR 23 P12: 49

Submitted Late

April 23, 1984

MEMORANDUM

EXECUTIVE SESSION

APR 24 1984

TO : The Commission

FROM : Charles N. Steele
General Counsel

SUBJECT: MUR 1667

On April 12, 1984, the Commission voted to schedule a special executive session for Thursday, April 26, 1984, to start at the conclusion of the open session in order to consider MUR 1667. However, at the special executive session held on Friday, April 20, 1984, the Commission voted 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 in MUR 1667.

In view of the granting of the extension of time, it appears that it will not be necessary to hold the special executive session scheduled for Thursday, April 26, 1984. Thus, the Office of General Counsel recommends that it be cancelled.

RECOMMENDATION:

Cancel the special executive session scheduled on April 26, 1984.

8504056565

FEDERAL ELECTION COMMISSION

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

8504030536667

THIS IS THE BEGINNING OF MUR # 1704

Date Filmed 4/2/84 Camera No. --- 2

Cameraman AS