FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 1744

Date Filmed 8/30/85 Camera No. --- 3

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MUR 1744

FEDERAL ELECTION COMMISSION

Conciliation materials; Routing cards; Comment sheets; 12 day report;

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

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

Signed Maura E Thate

date 8-28-85

FEC 9-21-77

8504054445

HUMAN RIGHTS CAMPAIGN FUND
P.O. BOX 1396
WASHINGTON, D.C. 20013

800

August 23 1985

15-131
540 1

Pay to the Order of U. S. Treasurer $ 150.00

One hundred fifty and no/100's Dollars

THE WOMEN'S NATIONAL BANK
1627 K Street, N.W. Washington, D.C. 20006

For Penalty MUR 1744

⑈000800⑈ ⑆054001314⑆ 00342122 0⑈

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 30 1985

Peter Y. Flynn
Obery Heights
Plymouth, MA 02360

RE: MUR 1744
Committee to Re-Elect
Congressman Studds; the
Human Rights Campaign Fund;
and Metro, Inc.;
Studds Trust Fund

Dear Mr. Flynn:

This is in reference to the complaint you filed with the Commission on July 24, 1984, concerning the Committee to Re-Elect Congressman Studds, the Human Rights Campaign Fund, and the Studds Trust Fund.

After conducting an investigation in this matter, the Commission determined there was reason to believe the Committee to Re-Elect Congressman Studds and Edwin M. Martin, Jr., as treasurer, violated 2 U.S.C. §§ 434(b)(5)(A), 434(b)(3)(B), 441b(a), and 441d, and 11 C.F.R. §§ 104.13, 104.3(b)(4)(i), and 104.3(b)(4)(i)(A). The Commission also determined that there was reason to believe: the Human Rights Campaign Fund and Victor J. Basile, as treasurer, violated 2 U.S.C. § 434(b)(6)(B)(i); the Studds Trust Fund violated 2 U.S.C. §§ 433 and 434; and Metro, Inc. violated 2 U.S.C. § 441b(a). On March 12, 1984, the Commission subsequently determined to take no further action against Metro, Inc. and to take no further action against the Committee to Re-Elect Congressman Studds and Edwin M. Martin, Jr., as treasurer, with respect to a violation of 2 U.S.C. §§ 441b(a) and 441d. On May 21, 1985, the Commission determined to take no further action against the Studds Trust Fund.

On June 17, 1985, and July 17, 1985, conciliation agreements signed by the treasurers of the Committee to Re-Elect Congressman Studds and the Human Rights Campaign Fund, respectively, were approved by the Commission, thereby concluding this matter. The Commission closed its file in this matter on July 17, 1985. Copies of the conciliation agreements are enclosed for your information.

3504044447

If you have any questions, please contact Maura White, the staff member assigned to this matter, at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Enclosures

3504054443

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Human Rights Campaign Fund) MUR 1744
Victor J. Basile, as treasurer)

CONCILIATION AGREEMENT

This matter was initiated by a signed, sworn, and notarized complaint by Peter Y. Flynn. The Federal Election Commission ("Commission") found reason to believe the Human Rights Campaign Fund and Victor J. Basile, as treasurer, ("Respondents") violated 2 U.S.C. § 434(b)(6)(B)(i).

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

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

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

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

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

1. Respondent, the Human Rights Campaign Fund, is a political committee registered with the Commission.

2. Respondent, Victor J. Basile, is the treasurer of the Human Rights Campaign Fund.

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3. During 1984 the Respondents mailed, at a cost of $5,090.96, a letter soliciting contributions for the Studds Trust Fund. The Studds Trust Fund is an entity established to defray the legal defense expenses of Representative Gerry Studds in connection with an investigation by the House Committee on Standards of Official Conduct. Respondents contend that it was their understanding that all of the funds raised by the Studds Trust Fund were to be used to defray these legal defense expenses, and none of the money raised was to be used for Representative Studds' reelection campaign or, in any way, to influence a federal election with respect to Representative Gerry Studds.

4. Respondents contend that the four page letter for contributions to the Studds Trust Fund was mailed to names contained on the Human Rights Campaign Fund's mailing list, of which not more than ten people on the Human Rights Campaign Fund's mailing list reside in Representative Studds' district.

5. The Committee to Re-Elect Congressman Studds is the principal campaign committee of Representative Gerry Studds for the 1984 elections.

6. Pursuant to 2 U.S.C. § 434(b)(6)(B)(i), a political committee is required to report the name and address of each political committee which has received a contribution from the reporting committee during the reporting period, together with the date and amount of any such contribution.

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V. The Commission finds that the four-page letter for contributions to the Studds Trust Fund which was mailed by the Human Rights Campaign Fund contained language which was, in part, for the purpose of influencing a federal election with respect to Representative Gerry Studds. Thus, Respondents violated 2 U.S.C. § 434(b)(6)(B)(i) by failing to report an in-kind contribution to the Committee to Re-Elect Congressman Studds in connection with the solicitation letter for the Studds Trust Fund.

VI. Respondents will pay a civil penalty of One Hundred and Fifty Dollars ($150) to the United States Treasurer, pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. Respondents agree that they shall not undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq.

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

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

X. Respondents shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and

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implement the requirements contained in this agreement and to so notify the Commission.

XI. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein and, unless violated, constitutes a bar on any further action by the Commission against the Human Rights Campaign Fund based on the facts and transactions described in this agreement. No other statement, promise, or agreement, either written or oral, made by either party, or by agents of either party, that is not contained in this written agreement shall be valid.

FOR THE COMMISSION:

Charles N. Steele
General Counsel

BY: _____ July 24, 1985
Kenneth A. Gross
Associate General Counsel

Date

FOR THE RESPONDENTS:

_____ June 20, 1985
Victor J. Basile, Treasurer
Human Rights Campaign Fund

Date

8504044452

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Committee to Re-Elect Congressman Studds; Edwin M. Martin, Jr., as treasurer	)	MUR 1744

CONCILIATION AGREEMENT

This matter was initiated by a signed, sworn, and notarized complaint by Peter Y. Flynn. The Federal Election Commission ("Commission") found reason to believe the Committee to Re-Elect Congressman Studds and Edwin M. Martin, Jr., as treasurer, ("Respondents") violated 2 U.S.C. §§ 434(b)(5)(A) and 434(b)(3)(B), and 11 C.F.R. §§ 104.13, 104.3(b)(4)(i), and 104.3(b)(4)(i)(A).

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

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

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

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

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

1. Respondent, the Committee to Re-Elect Congressman Studds, is a political committee registered with the Commission, and is the principal campaign committee of Gerry Studds.

2. Respondent, Edwin M. Martin, Jr., is the treasurer of the Committee to Re-Elect Congressman Studds. He is named in this agreement solely in his capacity as treasurer, and not as an individual.

3. Pursuant to 2 U.S.C. section 434(b)(5)(A) and 11 C.F.R. section 104.3(b)(4)(i), a political committee is required to disclose the name and address of each person to whom an expenditure in an aggregate amount or value in excess of $200 within the calendar year is made by the reporting committee to meet a candidate or committee operating expense, together with the date, amount, and purpose of such operating expenditure. The term purpose is defined at 11 C.F.R. section 104.3(b)(4)(i)(A) to mean a brief statement or description of why the disbursement was made.

4. Through June 30, 1984, Respondents had reported disbursements to the Rockland Trust Company with the purpose of the disbursements listed as payments to Mastercard for various goods and services. Respondents reported a disbursement to the Rockland Trust Company on May 15, 1984 in the amount of $418.80, with the purpose of the disbursement listed as "Mastercard: dinner, travel." Respondents also

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reported a disbursement to the Rockland Trust Company on June 15, 1984, in the amount of $21, with the purpose of the disbursement listed as "Mastercard: dinner."

5. Pursuant to 2 U.S.C. section 434(b)(3)(B), a political committee is required to report the identification of each political committee which makes a contribution to the reporting committee during the reporting period, together with the date and amount of any such contribution. As set forth at 11 CFR section 104.13 the amount of an in-kind contribution shall be equal to the usual and normal value on the date received and each in-kind contribution shall be reported as a contribution.

6. The Human Rights Campaign Fund, a political committee registered with the Commission, mailed a solicitation letter for contributions to the Studds Trust Fund, an entity established to defray Rep. Studds legal defense expenses, to individuals on the Human Rights Campaign Fund's mailing list at a cost of $5090.96. Respondents contend that none of the money was raised for the purpose of influencing a federal election, and that all the money was raised for the purpose of defraying Rep. Studds' legal defense expenses.

7. The above letter from the Human Rights Campaign Fund contained language which the Commission has determined was "for the purpose of influencing a federal election" with respect to Rep. Studds' reelection and, hence, constituted a

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contribution to the Committee to Re-Elect Congressman Studds from the Human Rights Campaign Fund. Respondents contend that they were not aware that the letter would be interpreted by the Commission as being for the purpose of influencing a federal election. They further contend that not more than ten people on the Human Rights Campaign Fund's mailing list reside in Rep. Studds' district, that all the money was raised for the purpose of defraying Rep. Studds' legal defense expenses, and that none of the money raised or spent by the Studds Trust Fund was used for Rep. Studds' campaign committee expenses.

V. In order to expedite the settlement of this matter, the Respondents accept the Commission's legal conclusion that they violated: 2 U.S.C. section 434(b)(5)(A) and 11 C.F.R. section 104.3(b)(4)(i) and (A) by failing to report the names of the entities, or ultimate payees, which provided the goods and services involved in the credit card payments to the Rockland Trust Company; and 2 U.S.C. section 434(b)(3)(B) and 11 C.F.R. section 104.13 by failing to report the receipt of an in-kind contribution from the Human Rights Campaign Fund.

VI. Respondents will pay a civil penalty of Five Hundred Dollars ($500) to the United States Treasurer, pursuant to 2 U.S.C. section 437g(a)(5)(A).

VII. Respondents agree that they shall not undertake any activity which is in violation of the Federal Election Campaign

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Act of 1971, as amended, 2 U.S.C. section 431, et seq.

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

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

X. Respondent shall have not more that thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

XI. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and, unless violated, constitutes a bar on any further action by the Commission against Respondents based on the facts and transactions described in this agreement. No other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be valid.

3504457

FOR THE COMMISSION:

Charles N. Steele
General Counsel

BY: _____ _____
Kenneth A. Gross Date
Associate General Counsel

FOR THE RESPONDENTS:

_____ _____
Edwin M. Martin, Jr. Date
Treasurer, Committee to
Re-Elect Congressman Studds

8504044458

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 30 1985

Andrew Buschbaum, Esquire
9406 Biltmore Road
Silver Spring, MD 20901

RE: MUR 1744
Committee to Re-Elect
Congressman Studds;
Edwin M. Martin, as treasurer;
Studds Trust Fund

Dear Mr Buschbaum:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within 10 days.

Should you have any questions, contact Maura White, the staff member assigned to this matter, at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 30 1985

Jeffrey M. Freedman, Esquire
Brown, Rudnick, Freed and Gesmer
One Federal Street
Boston, MA 02110

RE: MUR 1744
Metro, Inc.

Dear Mr. Freedman:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within thirty days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within 10 days.

Should you have any questions, contact Maura White, the staff member assigned to this matter, at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

8504054460

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 30, 1985

Edward Wendel, Esquire
Human Rights Campaign Fund
P.O. Box 1396
Washington, D.C. 20013

RE: MUR 1744
Human Rights Campaign Fund;
Victor J. Basile, as treasurer

Dear Mr. Wendel:

On July 17 , 1985, the Commission accepted the conciliation agreement signed by your clients, the Human Rights Campaign Fund and Victor Basile, as treasurer, in settlement of a violation of 2 U.S.C. § 434(b)(6)(B)(i), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

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

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement

3504054461

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Human Rights Campaign Fund) MUR 1744
Victor J. Basile, as treasurer)

CONCILIATION AGREEMENT

This matter was initiated by a signed, sworn, and notarized complaint by Peter Y. Flynn. The Federal Election Commission ("Commission") found reason to believe the Human Rights Campaign Fund and Victor J. Basile, as treasurer, ("Respondents") violated 2 U.S.C. § 434(b)(6)(B)(i).

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

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

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

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

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

1. Respondent, the Human Rights Campaign Fund, is a political committee registered with the Commission.

2. Respondent, Victor J. Basile, is the treasurer of the Human Rights Campaign Fund.

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3. During 1984 the Respondents mailed, at a cost of $5,090.96, a letter soliciting contributions for the Studds Trust Fund. The Studds Trust Fund is an entity established to defray the legal defense expenses of Representative Gerry Studds in connection with an investigation by the House Committee on Standards of Official Conduct. Respondents contend that it was their understanding that all of the funds raised by the Studds Trust Fund were to be used to defray these legal defense expenses, and none of the money raised was to be used for Representative Studds' reelection campaign or, in any way, to influence a federal election with respect to Representative Gerry Studds.

4. Respondents contend that the four page letter for contributions to the Studds Trust Fund was mailed to names contained on the Human Rights Campaign Fund's mailing list, of which not more than ten people on the Human Rights Campaign Fund's mailing list reside in Representative Studds' district.

5. The Committee to Re-Elect Congressman Studds is the principal campaign committee of Representative Gerry Studds for the 1984 elections.

6. Pursuant to 2 U.S.C. § 434(b)(6)(B)(i), a political committee is required to report the name and address of each political committee which has received a contribution from the reporting committee during the reporting period, together with the date and amount of any such contribution.

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V. The Commission finds that the four-page letter for contributions to the Studds Trust Fund which was mailed by the Human Rights Campaign Fund contained language which was, in part, for the purpose of influencing a federal election with respect to Representative Gerry Studds. Thus, Respondents violated 2 U.S.C. § 434(b)(6)(B)(i) by failing to report an in-kind contribution to the Committee to Re-Elect Congressman Studds in connection with the solicitation letter for the Studds Trust Fund.

VI. Respondents will pay a civil penalty of One Hundred and Fifty Dollars ($150) to the United States Treasurer, pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. Respondents agree that they shall not undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq.

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

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

X. Respondents shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and

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implement the requirements contained in this agreement and to so notify the Commission.

XI. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein and, unless violated, constitutes a bar on any further action by the Commission against the Human Rights Campaign Fund based on the facts and transactions described in this agreement. No other statement, promise, or agreement, either written or oral, made by either party, or by agents of either party, that is not contained in this written agreement shall be valid.

FOR THE COMMISSION:

Charles N. Steele
General Counsel

BY: _____ _____
Kenneth A. Gross
Associate General Counsel

Date

FOR THE RESPONDENTS:

_____ June 20, 1985
Victor J. Basile, Treasurer
Human Rights Campaign Fund

Date

3504044465

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Human Rights Campaign Fund
Victor J. Basile, as treasurer

MUR 1744

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on July 17, 1985, the Commission decided by a vote of 5-0 to take the following actions in MUR 1744:

2. Close the file.

3. Approve the letters attached to the General Counsel's Report signed July 9, 1985.

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

Attest:

7-18-85
Date

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

Received in Office of Commission Secretary: 7-15-85, 12:00
Circulated on 48 hour tally basis: 7-15-85, 4:00

3504054465

RECEIVED BY THE FEC
GCC 7991
85 JUL 15 A8:55

Andrew Buchsbaum
9406 Biltmore Drive
Silver Spring, MD 20901
(202) 624-8390

July 11, 1985

Maura White
General Counsel's Office
Federal Election Commission
Washington, D.C. 20463

Dear Ms. White,

As per our discussion of last week, please find enclosed a copy of a check for $1768.00 from the Human Rights Campaign Fund to the Studds Trust Fund. The check was delivered to the Studds Trust Fund on June 17, 1985, and has been deposited by the Studds Trust in its bank account.

Please call me if I can be of further assistance.

Sincerely,

Andrew Buchsbaum
Counsel, Studds Trust Fund

85 JUL 15 P1:16
RECEIVED
FEDERAL ELECTION COMMISSION
GENERAL COUNSEL

RE: MUR 1744
Studds Trust Fund

3504544467

HUMAN RIGHTS CAMPAIGN FUND
P. O. BOX 1396
WASHINGTON, D.C. 20013

No. 660

18-131/540

June 17, 1985

Pay to the order of Jessy E. Hudd Legal Services Trust $ 1768.00

One thousand seven hundred sixty-eight [illegible]

THE WOMEN'S NATIONAL BANK
1627 K Street, N.W. Washington, D.C. 20006

For _____

Marilyn J. Bruitkus

Treasurer

⑈00000660⑈ ⑆054001316⑆ 0034 2 6 2 2 0 6⑈

Andrew Buchsbaum
9406 Biltmore Drive
Silver Spring, MD 20901

WASHINGTON, DC
PM
11 JUL
1985



Maura White
Office of the General Counsel
Federal Election Commission
Washington, D.C. 20463

85 JUL 15 A8:55

4054462

ID # 040657 M1744

THE COMMITTEE TO RE-ELECT
CONGRESSMAN STUDDS
P.O. BOX 5 NORWELL, MA 02061

EXPLANATION	AMOUNT

3843

PAY Five Hundred 00/100 DOLLARS

TO THE ORDER OF		CHECK NUMBER	CHECK AMOUNT
Federal Election Commission	FEC Registration Fee	3843	$ 500

DESCRIPTION

ROCKLAND TRUST COMPANY
ROCKLAND, MASSACHUSETTS 02370

Mary Lou Butler

⑆011304478⑆ 3⑈022⑈8116⑈

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 20, 1985

Andrew Buschbaum, Esquire
9406 Biltmore Drive
Silver Spring, MD 20901

RE: MUR 1744
Committee to Re-Elect
Congressman Studds;
Edwin M. Martin, as
treasurer

Dear Mr. Buschbaum:

On June 17, 1985, the Commission accepted the conciliation agreement signed by your clients, the Committee to Re-Elect Congressman Studds and Edwin M. Martin, as treasurer, in settlement of a violation of 2 U.S.C. § 434(b)(5)(A) and § 434(b)(3)(B), provisions of the Federal Election Campaign Act of 1971, as amended, and 11 C.F.R. §§ 104.13, 104.3(b)(4)(i), and 104.3(b)(4)(i)(A). Accordingly, the file has been closed in this matter as it pertains to your clients, and it will become a part of the public record within thirty days after this matter has been closed with respect to all other respondents involved. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondents and the Commission. Should you wish any such information to become part of the public record, please advise us in writing within 10 days.

The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

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

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Enclosure

3504054472

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Committee to Re-Elect Congressman Studds; Edwin M. Martin, Jr., as treasurer	)	MUR 1744

CONCILIATION AGREEMENT

This matter was initiated by a signed, sworn, and notarized complaint by Peter Y. Flynn. The Federal Election Commission ("Commission") found reason to believe the Committee to Re-Elect Congressman Studds and Edwin M. Martin, Jr., as treasurer, ("Respondents") violated 2 U.S.C. §§ 434(b)(5)(A) and 434(b)(3)(B), and 11 C.F.R. §§ 104.13, 104.3(b)(4)(i), and 104.3(b)(4)(i)(A).

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

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

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

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

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

1. Respondent, the Committee to Re-Elect Congressman Studds, is a political committee registered with the Commission, and is the principal campaign committee of Gerry Studds.

2. Respondent, Edwin M. Martin, Jr., is the treasurer of the Committee to Re-Elect Congressman Studds. He is named in this agreement solely in his capacity as treasurer, and not as an individual.

3. Pursuant to 2 U.S.C. section 434(b)(5)(A) and 11 C.F.R. section 104.3(b)(4)(i), a political committee is required to disclose the name and address of each person to whom an expenditure in an aggregate amount or value in excess of $200 within the calendar year is made by the reporting committee to meet a candidate or committee operating expense, together with the date, amount, and purpose of such operating expenditure. The term purpose is defined at 11 C.F.R. section 104.3(b)(4)(i)(A) to mean a brief statement or description of why the disbursement was made.

4. Through June 30, 1984, Respondents had reported disbursements to the Rockland Trust Company with the purpose of the disbursements listed as payments to Mastercard for various goods and services. Respondents reported a disbursement to the Rockland Trust Company on May 15, 1984 in the amount of $418.80, with the purpose of the disbursement listed as "Mastercard: dinner, travel." Respondents also

3504144

reported a disbursement to the Rockland Trust Company on June 15, 1984, in the amount of $21, with the purpose of the disbursement listed as "Mastercard: dinner."

5. Pursuant to 2 U.S.C. section 434(b)(3)(B), a political committee is required to report the identification of each political committee which makes a contribution to the reporting committee during the reporting period, together with the date and amount of any such contribution. As set forth at 11 CFR section 104.13 the amount of an in-kind contribution shall be equal to the usual and normal value on the date received and each in-kind contribution shall be reported as a contribution.

6. The Human Rights Campaign Fund, a political committee registered with the Commission, mailed a solicitation letter for contributions to the Studds Trust Fund, an entity established to defray Rep. Studds legal defense expenses, to individuals on the Human Rights Campaign Fund's mailing list at a cost of $5090.96. Respondents contend that none of the money was raised for the purpose of influencing a federal election, and that all the money was raised for the purpose of defraying Rep. Studds' legal defense expenses.

7. The above letter from the Human Rights Campaign Fund contained language which the Commission has determined was "for the purpose of influencing a federal election" with respect to Rep. Studds' reelection and, hence, constituted a

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contribution to the Committee to Re-Elect Congressman Studds from the Human Rights Campaign Fund. Respondents contend that they were not aware that the letter would be interpreted by the Commission as being for the purpose of influencing a federal election. They further contend that not more than ten people on the Human Rights Campaign Fund's mailing list reside in Rep. Studds' district, that all the money was raised for the purpose of defraying Rep. Studds' legal defense expenses, and that none of the money raised or spent by the Studds Trust Fund was used for Rep. Studds' campaign committee expenses.

V. In order to expedite the settlement of this matter, the Respondents accept the Commission's legal conclusion that they violated: 2 U.S.C. section 434(b)(5)(A) and 11 C.F.R. section 104.3(b)(4)(i) and (A) by failing to report the names of the entities, or ultimate payees, which provided the goods and services involved in the credit card payments to the Rockland Trust Company; and 2 U.S.C. section 434(b)(3)(B) and 11 C.F.R. section 104.13 by failing to report the receipt of an in-kind contribution from the Human Rights Campaign Fund.

VI. Respondents will pay a civil penalty of Five Hundred Dollars ($500) to the United States Treasurer, pursuant to 2 U.S.C. section 437g(a)(5)(A).

VII. Respondents agree that they shall not undertake any activity which is in violation of the Federal Election Campaign

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Act of 1971, as amended, 2 U.S.C. section 431, et seq.

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

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

X. Respondent shall have not more that thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

XI. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and, unless violated, constitutes a bar on any further action by the Commission against Respondents based on the facts and transactions described in this agreement. No other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be valid.

3 5 0 4 4 7 7

FOR THE COMMISSION:

Charles N. Steele
General Counsel

BY: _____ June 20, 1985
Kenneth A. Gross
Associate General Counsel
Date

FOR THE RESPONDENTS:

_____ 6/2/85
Edwin M. Martin, Jr.
Treasurer, Committee to
Re-Elect Congressman Studds
Date

8504054478

RECEIVED AT THE FEC
GC#7623
85 MAY 30 A8:38

Andrew Buchsbaum
9406 Biltmore Drive
Silver Spring, MD 20901
(202) 624-8390

May 28, 1985

RECEIVED
FEDERAL ELECTION COMMISSION
GENERAL COUNSEL
85 MAY 30 A10:38

Ms. Lois Lerner
Office of the General Counsel
Federal Election Commission
Washington, D.C. 20463

Dear Ms. Lerner,

On May 28, 1985, I received a letter from the Commission advising that the Commission would take no further action against my client, the Studds Trust Fund, and allowing the Studds Trust Fund 10 days to submit factual or legal materials to appear on the public record.

As we discussed earlier today, by this letter the Studds Trust Fund requests a 10-day extension, until June 17, 1985, to submit additional factual and legal information to appear on the public record. We request this extension because Congressman Studds cannot be reached until he returns to Washington on June 4, 1985, and Peter Fleischer, who has been advising Congressman Studds on this matter, is out of the country until June 6, 1985. Both Congressman Studds and Mr. Fleischer will have to be consulted before any materials are submitted for the public record.

Thank you for your consideration in this matter. If you need to contact me, please call (202) 624-8390.

Sincerely,

Andrew Buchsbaum

Andrew Buchsbaum
Counsel for the Studds Trust Fund

8504044479

chsbaum
06 Biltmore Drive
lver Spring, MD 20901

-PM
28 MAY
1985

USA 22¢

Ms. Lois Lerner
Office of the General Counsel
Federal Election Commission
Washington, D.C. 20463

85 MAY 30 A8:

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 1744
Committee to Re-Elect Congressman Studds	)	
Edwin M. Martin, Jr., as treasurer	)	
Studds Trust Fund	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on May 21, 1985, the Commission decided by a vote of 6-0 to take the following actions in MUR 1744:

1. Take no further actions against the Studds Trust Fund, and close the file as it pertains to the Studds Trust Fund.

2.

3.

4. Approve the letter attached to the General Counsel's Report signed May 16, 1985.

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

Attest:

5-22-85
Date

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

8504054431

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Committee to Re-Elect) MUR 1744
Congressman Studds;)
Edwin M. Martin, Jr., as)
treasurer; Studds Trust)
Fund)

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

A. Studds Trust Fund

Fund is an entity established to defray the legal defense expenses of Representative Studds in connection with a House investigation. The Commission determined that the Studds Trust Fund became a political committee under the Act by transferring in excess of $1,000 ($1,768) to the Human Rights Campaign Fund, a registered political committee. The monies transferred by the

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Studds Trust Fund to the Human Rights Campaign Fund constituted a reimbursement for the costs of a solicitation letter mailed by the Human Rights Campaign Fund.1/ Because the Studds Trust Fund was never intended to be a political committee, the Studds Trust Fund has sought a refund of $1,768 from the Human Rights Campaign Fund. In an affidavit submitted to the Commission, the treasurer of the Human Rights Campaign Fund has agreed to refund $1,768 to the Studds Trust Fund "as soon as possible and, in any event, not later than 45 days from the date on which this affidavit is signed." See Attachment 1, page 3. In view of the fact that the amount transferred by the Studds Trust Fund will be refunded to it in the immediate future, thus eliminating any need to register and report as a political committee, and that the monies originally transferred were in reimbursement for services, it is the recommendation of this Office that the Commission take no further action against the Studds Trust Fund.

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1/ A portion of the solicitation letter was also for the purpose of influencing a federal election. See discussion below concerning the Committee.

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II. GENERAL COUNSEL'S RECOMMENDATIONS

1. Take no further action against the Studds Trust Fund, and close the file as it pertains to the Studds Trust Fund.

3.

4. Approve the attached letter.

Charles N. Steele
General Counsel

July 16, 1985
Date

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

8504054437

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 20, 1985

Jeffrey M. Freedman, Esquire
Brown, Rudnick, Freed and Gesmer
One Federal Street
Boston, MA 02110

RE: MUR 1744

Dear Mr. Freedman:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission on October 16, 1984, found reason to believe that your client, Metro (That's Entertainment Inc.) violated 2 U.S.C. § 441b(a), a provision of the Federal Election Campaign Act of 1971 as amended, and instituted an investigation or this matter. On November 9 and 13, 1984, you submitted a response to the Commission's finding on behalf of your client.

After considering the circumstances of this matter the Commission determined on March 12, 1985, to take no further action against Metro, and close the file as it pertains to Metro. The Commission reminds you that the corporation's declaration of support of a federal candidate in an advertisement nevertheless appears to be a violation of 2 U.S.C. § 441b(a). Your client should take immediate steps to insure that this activity does not occur in the future.

The confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

The file will be made public within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on

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the public record, please do so within ten days of your receipt of this letter.

Should you have any questions, please contact Maura White, the staff member assigned to handle this matter, at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Kennetn A. Gross
Associate General Counsel

8504054449 2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 20, 1985

Andrew Buschbaum, Esquire
9406 Biltmore Drive
Silver Spring, MD 20901

RE: MUR 1744
Committee to Re-Elect
Congressman Studds; Edwin
M. Martin, Jr., as treasurer;
Studds Trust Fund

Dear Mr. Buschbaum:

On October 16, 1984, the Commission found reason to believe that your clients, the Committee to Re-Elect Congressman Studds ("Committee") and Edwin M. Martin, Jr., as treasurer, violated 2 U.S.C. §§ 441b(a), 434(b)(5)(A), and 434(b)(3)(B), and 11 C.F.R. §§ 104.13 and 104.3(b)(4)(i) and (A). In addition, the Commission determined that your client, the Studds Trust Fund, violated 2 U.S.C. §§ 433 and 434. You subsequently submitted a response to the Commission's finding on behalf of each of your clients.

After considering the circumstances of this matter the Commission determined on March 12, 1985, to take no further action against the Committee and Edwin M. Martin, Jr., as treasurer, with respect to a violation of 2 U.S.C. § 441b(a). The Commission also determined on March 12, 1985, to find reason to believe the Committee and Edwin M. Martin, Jr., as treasurer, violated 2 U.S.C. § 441d with respect to the advertisement in the Metro Sunday Times and determined to take no further action with respect to this issue.

At your request, the Commission determined on March 12, 1985, to enter into negotiations with your clients directed towards reaching conciliation agreements in settlement of this matter prior to a finding of probable cause to believe.

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Enclosed are conciliation agreements that the Commission has approved in settlement of this matter. If your clients agree with the provisions of the enclosed agreements, please sign and return them, 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 agreements, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Maura White, the staff member assigned to this matter, at 523-4143.

Sincerely,

John Warren McGarry
Chairman

Enclosures

3504054491

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Committee to Re-Elect Congressman Studds	)	
Edwin M. Martin, Jr., as treasurer	)	MUR 1744
Studds Trust Fund	)	
Metro	)	

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of March 12, 1985, do hereby certify that the Commission decided by a vote of 5-1 to take the following actions in MUR 1744:

1. Take no further action against Metro (That's Entertainment, Inc.) with respect to a violation of 2 U.S.C. § 441b(a), and close the file as it pertains to Metro (That's Entertainment, Inc.).

2. Take no further action against the Committee to Re-Elect Congressman Studds and Edwin M. Martin, Jr., as treasurer, with respect to a violation of 2 U.S.C. § 441b(a).

3. Find reason to believe the Committee to Re-Elect Congressman Studds and Edwin M. Martin, as treasurer, violated 2 U.S.C. § 441d, and take no further action.

4. Approve the proposed conciliation agreement with the Committee to Re-Elect Congressman Studds and Edwin M. Martin, Jr., as treasurer, as recommended in the General Counsel's report dated February 28, 1985.

(continued)

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5. Approve the proposed conciliation agreement with the Studds Trust Fund, as recommended in the General Counsel's report dated February 28, 1985.

6. Approve the letters attached to the General Counsel's report dated February 28, 1985.

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

Attest:

3-13-85
Date

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

8504054493

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE, GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/ JODY C. RANSOM

DATE: MARCH 5, 1985

SUBJECT: OBJECTIONS - MUR 1744 General Counsel's Report signed February 28, 1985

The above-named document was circulated to the Commission on Friday, March 1, 1985 at 2:00.

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

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

This matter will be placed on the Executive Session agenda for Tuesday, March 12, 1985.

3504054494

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE, GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/JODY C. RANSOM

DATE: MARCH 4, 1985

SUBJECT: OBJECTION - MUR 1744 General Counsel's Report signed February 28, 1985

The above-named document was circulated to the Commission on Friday, March 1, 1985 at 2:00.

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

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

This matter will be placed on the Executive Session agenda for Tuesday, March 12, 1985.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary

FROM: Office of General Counsel

DATE: February 28, 1985

SUBJECT: MUR 1744 - General Counsel's Report

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

Open Session _____

Closed Session _____

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

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FEC
SECRETARY

BEFORE THE FEDERAL ELECTION COMMISSION

85 FEB 28 P 3:39

In the Matter of	)	
	)	
Committee to Re-Elect Congressman Studds; Edwin M. Martin, Jr., as treasurer; Studds Trust Fund; Metro	)	MUR 1744

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On October 16, 1984, the Commission determined that there is reason to believe the Committee to Re-Elect Congressman Studds ("Committee") and Edwin M. Martin, Jr., as treasurer, violated 2 U.S.C. §§ 434(b)(5)(A), 441b(a), and 434(b)(3)(B), and 11 C.F.R. §§ 104.13, and 104.3(b)(4)(i) and (A). In addition, the Commission determined that the Studds Trust Fund violated 2 U.S.C. §§ 433 and 434, and that Metro violated 2 U.S.C. § 441b(a). Notification of the Commission's finding was mailed to the respondents in this matter on October 23, 1984. Metro responded to the Commission's finding on November 9, 1984, and November 13, 1984 (Attachment 1).1/ The Committee and the Studds Trust Fund submitted their responses on December 10, 1984, and at this time requested to settle this matter prior to findings of probable cause to believe (Attachments 2 and 3).

1/ Metro's response notes that the corporation, That's Entertainment, Inc., conducts business in Metro's name.

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The Commission's finding of a violation of 2 U.S.C. § 441b(a) by the Committee and Metro in this matter pertains to an advertisement which appeared on the back cover of the April 1984 issue of the Metro Sunday Times. The advertisement was for a "Gerry Studds Benefit" held on April 15, 1984, at the nightclub, Metro. The advertisement, which was appended to Metro's response, stated "Proceeds to benefit Studds re-election to Congress" and "Metro's declaration of support. Show your support." The advertisement, however, did not state who paid its cost. In view of the language in the advertisement the Commission concluded that Metro made an in-kind contribution to the Committee by paying the cost of the advertisement, and that the Committee accepted the prohibited contribution.

In response to the Commission's finding the Committee states that it "did not receive any in-kind contribution from Metro." According to the Committee, the advertisement at issue cost $90, and it paid all of the costs of the April 15, 1984, fundraiser at Metro, "including the costs of the advertisement promptly and fully in the usual course of business for such events." The Committee explains that "[a]t the end of March, Metro and the Committee agreed that Metro would hold a fundraiser for Congressman Studds' re-election campaign on April 15" whereby Metro "would bill the Committee the standard fee for room rental, promotion and advertising." The Committee states that "[a]s part of Metro's promotion of the event, it placed an advertisement in

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its April newsletter, the Metro Sunday Times." Although the Committee apparently "agreed to pay for advertisements as part of the promotional expenses of the fundraising event, Metro inadvertently did not identify the Committee as the sponsor of the ad." The Committee contends that upon its realization on April 16, 1984, that the "sponsorship identification had not been placed on the ad" it asked Metro to correct the ommission as soon as possible. The correction occurred in Metro's "next newsletter in May."2/ The Committee's response concludes that it paid Metro promptly after the fundraiser "for all aspects of the fundraiser, including the advertisement in question, in the usual and customary business manner."

Information obtained from Metro in this matter supports the Committee's claim that the April 1984 advertisment was in fact paid for by the Committee. The response of Metro states that no action should be taken against it because "there has been no violation of the Act." In its reply Metro notes that the Committee paid for the advertisement in question. Metro supplied a copy of the Committee's check dated April 24, 1984, payable to "Entertainment Inc." for $2,229.50 which covered "the cost of the fundraiser, including the cost of the 'display ad'." Metro's response maintains that "[b]ecause the Committee, not Metro, paid

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2/ The May 1984 issue of the Metro Sunday Times states: "We regret the fact that we omitted the line 'Paid for by Studds for Congress Committee' in our April edition. (April 15 fundraiser)."

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for that ad, Metro made no improper corporate contribution to a federal election and thus did not violate the Act." According to Metro, the "fact that the ad did not state who absorbed its cost was simply an oversight," and "[a] written acknowledgement of this oversight was made in the May, 1984 issue of the Metro Sunday Times."

The evidence obtained in this matter indicates that the advertisement at issue was paid for by the Committee, rather than Metro, and that the Committee agreed to pay for the advertisement prior to the time it was placed. Hence, it does not appear that Metro made an in-kind contribution to the Committee by incurring the cost of the advertisement, or that the Committee accepted an in-kind contribution from Metro in connection with the payment of the cost of the advertisement. A peripheral issue which arises, however, concerns the instant advertisement's reference to "Metro's declaration of support." In this office's view the inclusion of this phrase in the solicitation could be considered to constitute something of value to the Committee from Metro in violation of 2 U.S.C. § 441b(a). It is, however, the recommendation of this office that the Commission take no further action against Metro and the Committee with respect to the Commission's finding of a violation of 2 U.S.C. § 441b(a). This recommendation reflects the fact that the advertisement cost only $90, and that the medium in which the ad was placed, the Metro Sunday Times, arguably has a very limited circulation because it

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is a promotional material issued monthly without charge to Metro's patrons.

With respect to the Committee's failure to include the statement on the above advertisement that it was paid for by the Committee, it is the recommendation of this Office that the Commission find reason to believe the Committee and Edwin M. Martin, Jr., as treasurer, violated 2 U.S.C. § 441d. */ It is the further recommendation of this Office that the Commission take no further action against the Committee in view of the fact that the Committee took steps to correct the ommission immediately after it was discovered.

II. DISCUSSION OF CONCILIATION AND CIVIL PENALTIES

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*/ Pursuant to 2 U.S.C. § 441d, whenever any person solicits any contribution through any broadcasting station, newspaper, magazine, outdoor advertising facility, direct mailing, or any other type of general public political advertising, such communication if paid for and authorized by an authorized political committee of a candidate, or its agents, shall clearly state that the communication has been paid for by such authorized political committee.

agreement with the Studds Trust Fund also requires the Fund to register and report as a political committee.

III. RECOMMENDATIONS

1. Take no further action against Metro (That's Entertainment, Inc.) with respect to a violation of 2 U.S.C. § 441b(a), and close the file as it pertains to Metro (That's Entertainment, Inc.),

2. Take no further action against the Committee to Re-Elect Congressman Studds and Edwin M. Martin, Jr., as treasurer, with respect to a violation of 2 U.S.C. § 441b(a).

3. Find reason to believe the Committee to Re-Elect Congressman Studds and Edwin M. Martin, as treasurer, violated 2 U.S.C. § 441d, and take no further action.

6. Approve the attached letters.

Charles N. Steele
General Counsel

February 28, 1985
Date

By: Kenneth A. Gross
Associate General Counsel

Attachments
1 - Response of Metro
2 - Response of Committee
3 - Response of Studds Trust Fund
4 - Proposed Conciliation Agreements and letters

3504045502

BROWN, RUDNICK, FREED & GESMER

84 NOV 9 A9:01

MATTHEW BROWN
ALFORD P RUDNICK
HIRSH FREED
HENRY GESMER
MARVIN N GELLER
JACK M CALECHMAN
DONALD E PAULSON
KENNETH A KORB
PETER D GENS
LAWRENCE M LEVY
STEPHEN WOLFBERG
PHILIP C SCHNEIDER
M FREDERICK PRITZKER
JOEL M RECK
ANDRE C JASSE JR
JEFFREY M FREEDMAN
CARL E AXELROD
GERALD R TISHLER
SHELDON M DRUCKER

PETER B FARROW
DANIEL D SULLIVAN
DAVID G STERN
M ROBERT DUSHMAN
ROBERT E BROOKS
JAMES E MCGUIRE
JOSEPH F RYAN
ELIZABETH A RITVO
FORREST DAVID MILDER
MARC D CUMSKY
NEAL B GLICK
DAVID H MURPHREE
JOHN ACHATZ
HOWARD L LEVIN
JOY BARRON RACHLIN
STEPHEN A MANTMAN
BARBARA A LENK
LOUIS C MILLER
MARILYN D STEMPLER

SHARON GODDARD WHITE
NANCY R WILSKER
HOWARD G ZAHAROFF
RICHARD A DOPPELT
PRESTON W HALPERIN
JEFFERY L KEFFER
JONATHAN KLEIN
STEVEN B LEVINE
JOHN A WORTMANN, JR
WARREN D HUTCHISON
KATHRYN WALSH
GORDON R PENMAN
THOMAS J RAUBACH
DENISE N YURKOFSKY
KATHLEEN A LAROCQUE
WILLIAM R BALDIGA
MICHAEL S BENJAMIN
RONALD M FELLMAN
JEFFREY W SACKS

COUNSELLORS AT LAW

ONE FEDERAL STREET, BOSTON, MASS. 02110

TELECOPIER: 542-3004 · CABLE: "LAWFIRM" BOSTON

TELEPHONE (617) 542-3000

COUNSEL
EDWARD SCHNEIDER
AARON J. BRONSTEIN

OF COUNSEL
JOHN F. COLLINS, P.C.
ROY N. FREED

November 7 , 1984

84 NOV 9 AM 8:37

Maura White, Esq.
Federal Election Committee
1325 K Street, N.W.
Washington, D.C. 20463

Your File No.: MUR 1744
Metro

Dear Ms. White:

Brown, Rudnick, Freed & Gesmer represents That's Entertainment, Inc., d/b/a Metro. We have been designated as counsel by That's Entertainment, Inc. in connection with the Federal Election Commission's investigation of Metro's possible violation of 2 U.S.C.§441b(a), a provision of the Federal Election Campaign Act of 1971, as amended (the "Act"). This letter and accompanying materials will demonstrate that no action should be taken against Metro because there has been no violation of the Act and that the Federal Election Commission (the "FEC") should close the file on the matter.

In the FEC's letter to Metro dated October 23, 1984, it was stated that the FEC's determination that there was reason to believe that Metro violated 2 U.S.C.§441b(a) was based on the General Counsel's Factual and Legal Analysis of the matter. In that analysis, it was stated that Metro made a prohibited "contribution" under the Act when it advertised an April 15, 1984 fundraiser for Representative Studds in a "display ad" on the back cover of the April, 1984 issue of the Metro Sunday Times. The General Counsel indicated that the "display ad" did not state who absorbed the cost of the ad. The language in the ad - "Metro's declaration of support. . . show your support" and "Proceeds to benefit Studds' re-election to Congress" - suggested to the General Counsel that the ad was paid for by Metro.

In fact, the Studds for Congress Committee (the "Committee") paid for the "display ad". A copy of the Committee's check to

Attachment 1 (1)

8504503

cover the cost of the fundraiser, including the cost of the "display ad", is enclosed with this letter. Because the Committee, not Metro, paid for that ad, Metro made no improper corporate contribution to a federal election and thus did not violate the Act.

The fact that the ad did not state who absorbed its cost was simply an oversight. A written acknowledgement of this oversight was made in the May, 1984 issue of the Metro Sunday Times: "We regret the fact that we omitted the line 'Paid for by Studds for Congress Committee' in our April edition. (April 15 fundraiser)." A copy of the "display ad" as it appeared in the April, 1984 issue of the Metro Sunday Times and a copy of the written acknowledgement of who paid for that ad as it appeared in the May, 1984 issue of the Metro Sunday Times are enclosed with this letter.

Upon a review of the factual material submitted with this letter and for the reasons stated above, the FEC should find that Metro has not violated the Act and that the FEC should close the file on the matter.

If we can be of further assistance in the prompt disposition of this matter, please call or write.

Very truly yours,

Jeffrey M. Freedman

Jeffrey M. Freedman

JMF/tk
encl
20,164(1)
11/07/84:dvj

cc: Mr. Edward Sparks
Mr. Patrick Lyons
Eric Allon, Esquire

8504054504

(3)

THE COMMITTEE TO RE-ELECT
CONGRESSMAN STUDDS

2402

April 24 19 74 53-447 113

PAY TO THE ORDER OF Entertainment, Inc $ 2,229.50

Two Thousand, two hundred and twenty-nine 50/100 DOLLARS

Rockland Trust Company
Rockland, Massachusetts 02370

FOR use of facilities, promotional activities

Mary Lou Burden

⑆011301478⑆ 3-022-814 "0000222950"

8504054505

8 5 0 4 0 5 4 4 5 0 6

FOR DEPOSIT ONLY IN
070-762-5
THAT'S ENTERTAINMENT INC.
D/B/A METRO-SPIT

AP 84 30
SHAWMUT BANK
OF BOSTON, N.A.
PAY ANY BANK

(4)

BROWN, RUDNICK, FREED & GESMER

84 NOV 13 P12:09

MATTHEW BROWN
ALFORD P RUDNICK
HIRSH FREED
HENRY GESMER
MARVIN N. GELLER
JACK M. CALECHMAN
DONALD E. PAULSON
KENNETH A. KORB
PETER D. GENS
LAWRENCE M. LEVY
STEPHEN WOLFBERG
PHILIP C. SCHNEIDER
M. FREDERICK PRITZKER
JOEL M. RECK
ANDRE C. JASSE, JR.
JEFFREY M. FREEDMAN
CARL E. AXELROD
GERALD P TISHLER
SHELDON M. DRUCKER

PETER B. FARROW
DANIEL D. SULLIVAN
DAVID G. STERN
M. ROBERT DUSHMAN
ROBERT E. BROOKS
JAMES E. MCGUIRE
JOSEPH F. RYAN
ELIZABETH A. RITVO
FORREST DAVID MILDER
MARC D. GUMSKY
NEAL B. GLICK
DAVID H. MURPHREE
JOHN ACHATZ
HOWARD L. LEVIN
JOY BARRON RACHLIN
STEPHEN A. HANTMAN
BARBARA A. LENK
LOUIS C. MILLER
MARILYN D. STEMPLER

SHARON GODDARD WHITE
NANCY R. WILSKER
HOWARD G. ZAHAROFF
RICHARD A. DOPPELT
PRESTON W. HALPERIN
JEFFERY L. KEFFER
JONATHAN KLEIN
STEVEN B. LEVINE
JOHN A. WORTMANN, JR.
WARREN D. HUTCHISON
KATHRYN WALSH
GORDON R. PENMAN
THOMAS J. RAUBACH
DENISE N. YURKOFSKY
KATHLEEN A. LAROCQUE
WILLIAM R. BALDIGA
MICHAEL S. BENJAMIN
RONALD M. FELLMAN
JEFFREY W. SACKS

COUNSELLORS AT LAW

ONE FEDERAL STREET, BOSTON, MASS. 02110

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COUNSEL
EDWARD SCHNEIDER
AARON J. BRONSTEIN

OF COUNSEL
JOHN F. COLLINS, P.C.
ROY N. FREED

November 9, 1984

EXPRESS MAIL

Maura White, Esquire
Federal Election Committee
1325 K Street, N.W.
Washington, D.C. 20463

84 NOV 13 P2:26

Re: Your File No. MUR 1744 - METRO

Dear Ms. White:

As per your telephone conversation this day with my associate, Eric Allon, enclosed please find a copy of the "display ad" as it appeared in the April, 1984 issue of the Metro Sunday Times and a copy of the written acknowledgment of who paid for that ad as it appeared in the May, 1984 issue of the Metro Sunday Times. These enclosures were inadvertently omitted from my letter of November 7, 1984.

I apologize for any inconvenience this may have caused.

Very truly yours,

Jeffrey M. Freedman

Jeffrey M. Freedman

JMF/alp
Enclosures

8504507

(5)

Club Café

209 Columbus Ave.

The newest and hottest alternative to Boston's restaurant and bar scene.

Now featuring a full licuor bar with live entertainment Thursday, Friday & Saturday 9pm - midnight and Sunday brunch noon - up.

Happy hour 7days a week 3pm - 7pm
House drinks $1.75
Miller & Lite $1.00

Reservations suggested 536-0966



(6)





Metro Sunday Times
7 Lansdowne St. Boston
262-2424

Boston/Worcester

Publisher
George Tamsitt

Art Director
Mike Hoffman

Designer
Kevin McIntire

Sun., May 20 - [illegible] NIGHT
Sun., May 31 - 2 FOR 1 KICKOFF
Sun., June 7 - "A Night in White"
GAY PRIDE CELEBRATION

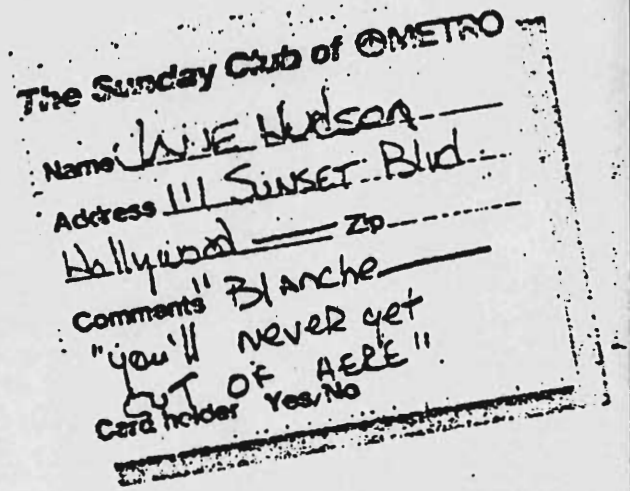
Stat

Thurs., May 3 - BILL NELSON
Wed., May 9 - NOVEMBER GROUP
Thurs., May 10 - SEX CATS

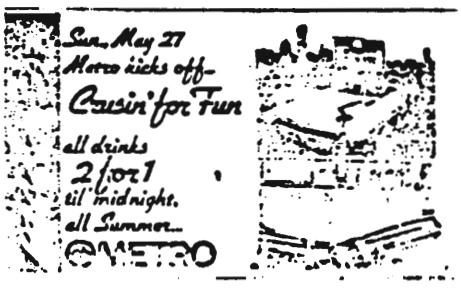
Thurs., May 17 - SKIN
Thurs., May 25 - BOYS & GIRLS
Fri., May 25 - GUMBA MIRANDA NIGHT
Thurs., May 31 - VIOLENT FEMMES

Unfortunately, George Tamsitt was unable to make his deadline this month (due to the KISS-108 party). He'll be back next month. He did want to say ..

We regret the fact that we omitted the line "Paid for by Studds for Congress Committee" in our April Edition. (April 15 fundraiser)







Studds for Congress

0004345913

Maura White
Office of the General Counsel
Federal Elections Commission
1325 K Street, NW
Washington, DC 20463

RE: MUR 1744
Response to the Commission's
"reason to believe" finding

Dear Ms. White:

This letter responds to the Commission's letter of October 23, 1984, which notified the Committee to Re-Elect Congressman Studds ("the Committee") and its treasurer, Edwin M. Martin, Jr., that the Commission has made a preliminary finding of reason to believe that the Committee violated several technical provisions of the Federal Election Campaign Act ("the Act"). Because the charges made by the Commission were quite different from the vague and unsupported allegations in the original complaint made by Congressman Studds' primary opponent, because of the exigencies of the election on November 6, 1984, and because of unavoidable prior commitments by key parties, the Commission, in a letter dated November 13, 1984, allowed the Committee until December 10 to respond to respond to its preliminary findings.

By this letter, the Committee and Mr. Martin emphatically deny that the Committee or its employees have violated the provisions of the Act as charged in the Commission's reason to believe letter of October 23 or have violated any other federal election laws. The factual and legal information presented below will demonstrate that no violations have occurred. However, should the Commission believe that any issues remain unresolved, we request that the Commission allow us to begin the conciliation process as soon as possible after receipt of this response, and in any event, before the probable cause stage of the enforcement proceedings.

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DISCUSSION OF THE CHARGES

1. Credit Card Transactions

The Commission's first charge is that the Committee failed "to properly disclose two expenditures to the Rockland Trust Company...involving credit card transactions." The two transactions referred to by the Commission were payments to MasterCard of $418.00 on May 15, 1984, and $21.00 on June 15, 1984. The payments were reported in Schedule B, page 4, lines B and C of the Committee's report for April 1, 1984-June 31, 1984 as follows:

38 Rosa's Lane, Scituate, Massachusetts 02066 (617) 545-6191
Authorized by the Studds for Congress Committee

Attachment 2 (8)

Name	Purpose of disbursement	Date	Amount
Rockland Trust Company	MasterCard: dinner, travel	5/15/84	$418.00
Same	MasterCard: dinner	6/15/84	$ 21.00

These reports comply with the FEC regulations setting out the reporting requirements under the Act. The regulations require the disclosure of the name of the person to whom the disbursement was made, "together with the date, amount the purpose of each expenditure." 11 CFR 104.3 (b)(4)(i). The Committee has reported precisely what was required by the regulations: Rockland Trust Company, the name of person receiving the disbursements; May 15 and June 15, 1984, the respective dates; $418.00 and $21.00, the respective amounts; and "MasterCard: dinner and travel", and "MasterCard: dinner", the respective purposes. There are no special reporting requirements concerning credit card transactions in the regulations.

The reporting regulations are buttressed by record-keeping requirements which do refer specifically to credit card transactions. Under 11 CFR 102.9 (b)(2)(ii), political committees must document credit card disbursements by monthly billing statements or by customer receipts. That regulation only requires a political committee to preserve the documentation and make it available to the Commission upon request; it does not require a committee to report each credit card transaction separately

The Committee has kept its monthly billing statements for its credit card transactions, including the transactions referred to by the Commission in its reason to believe letter of October 23, 1984, and provides them to the Commission herein as Appendix A. This documentation complies with the documentation requirements for credit card disbursements set out in 11 CFR 102.9 (b)(2)(ii).

The Commission's claim that the Committee did not properly report these credit card transactions apparently is based on a handbook the Commission made available to candidates, and not on the Commission's regulations. That handbook illustrates a method of reporting credit card disbursements which provides the same information reported by the Committee, with one addition: it provides the name of the vendor whose products or services were purchased by credit card. Although this information was not included in the Committee's report, it has been preserved by the Committee and made available to the Commission upon request pursuant to Section 102.9. The Committee's method of disclosing these credit card disbursements therefore complies with the Commission's regulations. However, because the Commission may have preferred the reporting method set out in the handbook, the Committee would be happy to report these transactions in that manner in the future if the Commission so requests.

2. The Metro Advertisement

The Commission's second charge against the Committee is that the Committee accepted an in-kind contribution from Metro, a corporation, which promoted and held a fundraiser for Congressman Studds. The Commission claims that Metro placed a $90 advertisement for the fundraiser at its own expense in its newsletter, the Metro Sunday Times. Because this advertisement

was made for the purpose of [illegible]isting the Committee's [illegible]rts to raise funds, the Comm[illegible]sion reached a preliminar[illegible]conclusion that the cost of the adver[illegible]sement was an in-kind contribution to the Committee.

The Commission's conclusion is premature. Because the Committee reimbursed Metro for all expenses, including the costs of the advertisement, promptly and fully in the usual course of business for such events, no in-kind contribution occurred. Metro, a nightclub, frequently holds fundraisers for various candidates and political causes. At the end of March, Metro and the Committee agreed that Metro would hold a fundraiser for Congressman Studds' re-election campaign on April 15. The Committee would receive all the money collected at the door; Metro would receive all money spent at the bar, and would bill the Committee the standard fee for room rental, promotion and advertising. This agreement was confirmed by the bill Metro sent the Committee the week after the fundraiser, attached hereto as Appendix B.

As part of Metro's promotion of the event, it placed an advertisement in its April newsletter, the Metro Sunday Times (see Appendix C). Although the Committee had agreed to pay for advertisements as part of the promotional expenses of the fundraising event, Metro inadvertently did not identify the Committee as the sponsor of the ad. The fundraiser took place on April 15. On April 16, the Committee realized that the sponsorship identification had not been placed on the ad, and asked Metro to correct the ommission as soon as possible. Metro did so in its next newsletter in May. See Appendix D.

The Committee paid Metro promptly after the fundraiser. Metro sent the Committee a letter confirming their oral agreement and billing the Committee pursuant to that agreement sometime during the week after the April 15 event. The Committee paid Metro in full on April 24, 1984, nine days after the fundraiser took place. See Appendix E (copy of the cancelled check).

The arrangement and conduct of the fundraiser in question, as described above and as documented by the attached Appendices, fully complied with all the federal election laws. The Committee paid for all aspects of the fundraiser, including the advertisement in question, in the usual and customary business manner. The only problem, which arose when Metro inadvertently excluded the sponsorship identification from the advertisement, was quickly and satisfactorily resolved. Thus, the Committee did not receive any in-kind contribution from Metro.

3. The Human Rights Campaign Fund's Solicitation Letter

The Commission's third charge against the Committee is that the Committee accepted an in-kind contribution from the Human Rights Campaign Fund ("the Fund"). According to the Commission, the in-kind contribution arose from a letter signed by Fund president Dan Bradley and paid for by the Fund which solicited money for the Studds Trust Fund ("the Trust"). According to Victor Basile, the Fund's treasurer, the Fund spent $5090.96 initially to mail the letter, which asked donors to send money to the Trust to help defray Congressman Studds' legal fees resulting from a Congressional investigation. According to the Trust, the Trust later repaid the Fund $1768. The money raised from the letter --

indeed, all the money raised from all sources for the T[illegible] -- was spent by the Trust on legal fees, on expenses incurred in raising additional money for the Trust, and on administrative costs. None of the money was spent on campaign related activities, or for the purpose of re-electing Congressman Studds. These facts were explained to the Commission and documented in the Committee's answer to the original complaint, attached hereto as Appendix F.

The Commission's objection to the Fund's letter is that the letter "was, in part, for the purpose of influencing a federal election," even though all the money raised from the letter went to defray noncampaign legal expenses. Money spent for the purpose of influencing a federal election is defined as a contribution under the Act. See U.S.C. 431(8)(A)(i). Apparently, the Commission's theory is that the content of the letter makes the letter itself a communication advocating the election of Congressman Studds.

The Commission's parsing of the letter's language both misrepresents the meaning of the letter and flaunts the First Amendment protection afforded controversial political speech. The letter is four pages long, single spaced. The first page described Congressman Studds' historic statement from the floor of the House of Representatives. The second page explained the reaction to the statement, and the legal fees incurred by the Congressman. Nowhere on these pages is the Congressman's re-election mentioned.

The letter made its fundraising pitch on the third page. It announced the creation of a trust fund to help defray the legal expenses, and continued:

> I would like to ask you to join in making a contribution to this Trust, the proceeds from which will be used exclusively to re-pay these legal fees.
>
> By making such a contribution, you will do far more than help alleviate this debt. You will be telling Gerry Studds that you appreciate his determination to insist that sexual preference is irrelevant to a person's performance in profesional life.

Bradley letter, page 4 (emphasis added) (attached hereto as Appendix G).

The letter then discussed how Congressman Studds' courageous statement would make his re-election campaign more "brutal" if he chose to run for office in 1984. It did not ask for funds to be used for the Congressman's re-election, and none of the funds collected were used for that purpose. It urged recipients to mail a donation to "send Gerry Studds your vote of confidence, to encourage him to run in 1984. You can send a message of friendship and support to a Congressman who deserves the very best."

The clear purpose of the letter was to raise money for the Studds Trust. It accomplished that purpose mostly by appealing to the personal feelings of those who received the letter. Undeniably, the letter asked for people to show their support for Congressman Studds, and because the Congressman is an elected official, that support might naturally encourage him to seek reelection. However, that support was a "vote of confidence" and friendship by people who respect the Congressman, regardless of their views on his

reelection. Indeed, the l[illegible] stated that Congressm[illegible]udds had not decided whether h[illegible] would run for reelection. The letter raised no money for his campaign. In short, the purpose and effect of the letter were to raise money to help Congressman Studds defray noncampaign legal expenses. Such a letter is not an in-kind contribution.

Recent court decisions emphasizing the constitutional protection of political speech reinforce this conclusion. In Buckley v. Valeo 424 U.S. 1 (1976), the Court cautioned,

> Public discussion of public issues which are also campaign issues readily and often unavoidably draws in candidates and their problems, their voting records and other official conduct. Discussion of those issues, and as well as more positive efforts to influence public opinion on them, tend naturally and inexorably to exert some influence on voting at elections.

424 U.S. at 42 n.50 (emphasis added). The court refused to consider such communications as contributions, even though their incidental purpose was to influence the outcome of a federal election. 424 U.S. at 80. See also FEC v. AFSCME, 471 F. Supp. 315, 316-17 (D.D.C. 1976). More recently, the Second Circuit, sitting en banc, admonished the Commission for its overzealous enforcement of the Act against an organization that distributed candidates voting records. As Chief Judge Kaufman wrote in a strongly-worded concurring opinion,

> If speakers are not granted wide latitude to disseminate information without government interference, they will "steer far wider of the unlawful zone," Speiser v. Randall, 357 U.S. 513, 526 (1958), thereby depriving citizens of valuable opinions and information. This danger is especially acute when an official agency of government has been created to scrutinize the content of political expression, for such bureaucracies feed upon speech and almost ineluctaby come to view unrestrained expression as a potential "evil" to be tamed, muzzled or sterilized. United States v. National Committee for Impeachment, 469 F. 2d. 1135, 1142 (2nd Cir. 1972). Accordingly, it is not completely surprising that the FEC should view the content of defendants' leaflet in a substantially different light than the members of this court.
>
> The possible inevitability of this institutional tendency, however, renders this abuse of power no less disturbing to those who cherish the First Amendment and the unfettered political process it guarantees. Buckley v. Valeo, supra, imposed upon the FEC the weighty, if not impossible, obligation to exercise its powers in a manner harmonious with a system of free expression.

FEC v. Clitrim, 616 F. 2d 45, 54-55 (2nd Cir. 1980).

These constitutional principles apply with equal vigor to the Fund's letter. The letter asked for nonpolitical support on a controversial and sensitive public issue. Its sole purpose and function were to raise funds to pay for legal fees. In its fundraising appeal, it incidentally discussed Congressman Studds' re-election prospects. That presentation is the same as the

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discussion referred to in Buckley that "tends to lead naturally and inexorably to exert some influence on voting at elections," and which is fully protected from regulation by the First Amendment. In short, neither the purpose nor the effect of the letter was to influence a federal election. The letter was not an in-kind contribution from the Fund to the Committee.

The letter's negligible and incidental influence in the election is highlighted by the fact that only a handful of people who received the letter resided in Congressman Studds' district and could vote in the election. Unlike other nationwide fundraising efforts, the Fund's letter had no affect on the Committee's fundraising; all the money raised by the letter was used for legal expenses, not for campaign expenses. Thus the only expenses which could have had the purpose of influencing a federal election were the expenses associated with sending the letters to persons in the Congressman's district who could vote for the Congressman and thereby affect the outcome of the election. According to Victor Basile, treasurer of the Fund, only 10 people out of the 10,000 names on the Fund's mailing list reside in Congressman Studds' district. The mailing's only possible influence on a federal election would arise from the letters mailed to those 10 people, or one-tenth of one percent of the entire mailing list. The mailing clearly did not have the purpose or effect of influencing a federal election.

A second factor which emphasizes the incidental influence that the letter had on the election is the small portion of the letter which arguably relates to Congressman Studds' re-election. Only three sentences in the four-page letter refer to Congressman Studds' re-election; the rest discuss his historic statement and his career in Congress. Thus, only a fraction of each letter -- approximately ten percent -- can be considered to have had some sort of impact on a federal election. The purpose and effect of the letter clearly are unrelated and incidental to influencing a federal election.

4. The Studds Trust

The Commission's final charge is that the Studds Trust became a political committee "as a result of its transfer of $1,768 to the Human Rights Campaign Fund" yet failed to register and file the reports required of political committees under 2 U.S.C. Sections 433 and 434. This allegation is unsupported by law or fact. The transfer in question was a partial repayment for services rendered and did not constitute a contribution or expenditure; thus, the Trust is not a political committee, subject to the Act's registration and reporting requirements.

Under the Commission's regulations, "political committee" is defined as any group of persons "which receives contributions aggregating in excess of $1000 or which makes expenditures aggregating in excess of $1000 during a calendar year." 11 CFR 100.5 (a). "Contribution" is normally defined under the Act as "any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for federal office" (emphasis added). 2 U.S.C. Section 431(8)(A)(i). "Expenditure" is defined as "any purchase, payment, distribution, loan, advance, deposit, or gift of money or anything of value, made by any person for the purpose of influencing any election for Federal office..." (emphasis added). 2 U.S.C. Section 431(9)(A)(i). Thus, organizations become

political committees only i. ..ey raise or spend over ....0 for the purpose of influencin a Federal election.

These definitions guided the Commission when it issued Advisory Opinion 1983-21, which concluded that a legal defense fund such as the Studds Fund would not be subject to the registration and reporting requirements of the Act:

> The Commission concludes that to the extent the proposed trust fund is used exclusively for the purpose of paying the costs of [Rep. Studds] legal defense arising from Congressional or other proceedings not involving compliance or audit matters under the Act, donations to and disbursements from the Trust would not constitute contributions or expenditures under the Act...Accordingly, neither the source nor the amount of donations to the Trust would be limited under the Act or Commission regulations. Nor would the Act or regulations require any reporting of receipts or payments of the Trust. In reaching this conclusion the Commission also assumes that none of the residual funds, upon dissolution of the Trust, will be distributed or transferred to your campaign committee or to any other political committee.

As the Trust has already documented in the Committee's answer to the original complaint, all the Trust's funds were raised and spent solely for the purpose of defraying Congressman Studds' legal expenses, and to pay for administrative and fundraising costs for the Trust. The Trust therefore has fully and consistently complied with the conditions set out in the Advisory Opinion. Nevertheless, the Commission objects to the Trust's "transfer" of money to the Fund.

It is clear under the Act and the regulations that a payment of funds is relevant to the issue of whether the payor is a political committee only in so far as the payment involves a contribution or expenditure. A payment of funds will bring an organization under the purview of the Act only if the payment is made "for the purpose of influencing a Federal election." Although AO 1983-21 warns the Trust not to distribute or transfer funds to a political committee, the prohibition against such payments only applies to contributions or expenditures by the Trust.

The Trust's reimbursement of $1,768 to the Fund was neither a contribution nor an expenditure. The Fund served as a direct mail fundraiser for the Trust. It spent $5090.96 to solicit money for the Trust. The Trust repaid $1,768 of those expenses. Although the Fund is a political committee, operating at least in part for the purpose of influencing a Federal election, the Trust's reimbursement to the Fund for services rendered must be treated as if the Fund were a vendor providing a fundraising service. Thus, the reimbursement was not a contribution to the Fund.**

The Commission's regulations acknowledge that such repayments are not contributions under the Act. According to the regulations, if a political committee makes a loan to any person, "[r]epayment of the principal amount of such loan to such political committee shall not be a contribution by the debtor to the lender committee" (emphasis added). 11 CFR 100.7(a)(1)(i)(E). This provision applies with equal force to repayments for service

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rendered, such as those per ed by the Fund for the . fit of the Trust.

Neither was the payment from the Trust to the Fund an expenditure under the Act. The payment reimbursed the Fund for a portion of its costs in mailing the Bradley solicitation letter. As discussed in detail above, the purpose and effect of that letter were to raise money to defray Congressman Studds' non-campaign legal expenses. Any impact or influence the letter might have had on a federal election was incidental. Such incidental impacts do not make the Trust a political committee. As the Supreme Court noted in Buckley, many political communications not covered by the Act have had the incidental purpose or effect of influencing a federal election. 424 US at 42 n.50.***

This concludes our response to the Commission's reason to believe findings in MUR 1744. Our response demonstrates that the Committee, Mr. Martin, or the Studds Trust. The Commission therefore should find that no violation has occurred, and vote to close the file.

However, should you decide that any questions remain unanswered, we request the opportunity to begin conciliation proceedings before you move to the probable cause phase of the enforcement process.

Please write or call if we can be of any further assistance.

Sincerely,

Andrew Buchsbaum

Andrew Buchsbaum
Counsel for the Committee to Re-Elect
Congressman Studds and Edwin M.
Martin, Jr.

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FOOTNOTES

*Mr. Basile calculated the number of people who received the letter and reside in the Congressman's district by comparing the zip codes of the district with the zip codes of the names on the Fund's mailing list. Only 10 people on the mailing list had addresses with zip codes that corresponded to the zip codes in Congressman Studds' district.

**This situation therefore is different from the one considered by the Commission in Advisory Opinon 1981-1. There, the Commission concluded that an organization's disbursement of excess campaign funds to a political committee would be a contribution. In that case, however, the disbursement was a donation, not a payment made in return for any services or products. Here, the Trust's disbursement was part of a business arrangement to reimburse the Fund for the costs of sending a solicitation letter for the Trust.

Our situation is closer to the one considered by the Commission in AO 1980-38, where the Commission concluded that payments from a state organization to a political committee for the use of a computer would not constitute contributions from the state organization.

***Regardless of the Commission's conclusions about whether the payment was an expenditure, far less than $1000 of the payment arguably could have had the purpose of influencing a federal election. As discussed above, fewer than one-tenth of one percent of the letters were mailed to persons in Congressman Studds' district. Only ten percent of each letter could have had an incidental influence on the outcome of the election. Thus, only a tiny fraction of the $1,768 -- far less than the $1000 amount that triggers registration and reporting requirements under the Act -- could have been spent by the Trust arguably for the purpose of influencing a federal election.

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APPENDIX A

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CUSTOMER INFORMATION
(Cardholder Name and Mailing Address)

617-878-6180 0247

Cir. # 2472

ACCOUNT NUMBER	CREDIT LIMIT	AVAILABLE CREDIT	DAYS IN BILLING CYCLE	BILLING CYCLE CLOSING DATE	PAYMENT DUE DATE	MINIMUM PAYMENT DUE
5207 7454 0356 4206	2500	1785	29	04/25/84	05/20/84	13.00

DATE OF TRANS.	DATE POSTED	REFERENCE NUMBER	CHARGES, PAYMENTS AND CREDITS SINCE LAST STATEMENT	AMOUNT
0323	0330	7520700FAUBAT947D	PRONTO PROVINCETOWN MA	38.45
0405	0405	*7520700FHX2CLDUC5	PAYMENT - THANK YOU	294.81-
0326	0409	7530070FG2G57GH60	NAPIS RESTAURANT PROVINCETOWN MA	10.40
0314	0410	7515000FLAGOMNAZM	TWA 288 01558737491409 WASHINGTON DC FR 5	359.50
0324	0410	7530070FA2TE06JJ6	NAPIS RESTAURANT PROVINCETOWN MA	10.45

PREVIOUS BALANCE	PAYMENTS	CREDITS	CASH ADVANCES	MERCHANT ADVANCES	DEBIT ADJUSTMENTS	[illegible]	NEW BALANCE
294.81	294.81	0.00	0.00	418.80	0.00	0.00	418.80

AN AMOUNT FOLLOWED BY A MINUS SIGN(-) IS A CREDIT OR A CREDIT BALANCE UNLESS OTHERWISE INDICATED.

SEND NOTICE OF BILLING ERRORS TO: ROCKLAND TRUST COMPANY 288 UNION ST. ROCKLAND MA 02370

RANGE OF BALANCES TO WHICH RATES APPLY	MONTHLY PERIODIC RATE	[illegible]	BALANCE ON WHICH FINANCE CHARGE WAS COMPUTED IS		CASH ADVANCES OUTSTANDING
ALL	1.500%	18.00%	0.00		0.00
	%	%			

MasterCard

AY

IF NO CASH ADVANCES ARE OUTSTANDING ON THE DATE YOUR PAYMENT IS CREDITED, YOUR PAYMENT OF NEW BALANCE BY PAYMENT DUE DATE WILL AVOID ADDITIONAL FINANCE CHARGE ON THE NEW BALANCE. 6

NOTICE: See reverse side for important information.

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CUSTOMER INFORMATION
(See reverse side for billing rights summary)

617-878-6100 0247

CL # 2512

ACCOUNT NUMBER	CREDIT LIMIT	AVAILABLE CREDIT	DAYS IN BILLING CYCLE	BILLING CYCLE CLOSING DATE	PAYMENT DUE DATE	MINIMUM PAYMENT DUE
5207 1434 0356 4206	2500	1786	30	05/25/84	06/19/84	21.00

DATE OF TRANS	DATE OF POST	REFERENCE NUMBER	CHARGES, PAYMENTS AND CREDITS SINCE LAST STATEMENT	AMOUNT
0430	0430	7520700G9UBC8WNM8	PBA,INC NAPLES FL	296.00
0506	0508	7525400GG00WKP1TD	PACIFIC SOUTHWEST AIRL BURBANK CA	64.00
0506	0508	7525400GG00WKP1T5	PACIFIC SOUTHWEST AIRL BURBANK CA	64.00
0507	0509	7525400GH00WKHTXL	PACIFIC SOUTHWEST AIRL SAN FRANCISCO CA	64.00
0507	0509	7525400GH00WKHTXV	PACIFIC SOUTHWEST AIRL SAN FRANCISCO CA	64.00
0430	0509	7520700GJUBCRYPFC	PRONTO PROVINCETOWN MA	25.25
0506	0511	7541037GK0B364UX6	GROSVENOR AIRPORT INN S SAN FRAN CA	14.00
0504	0514	7520400GL4MFK7JHX	CHEVRON INGLEWOOD CA	10.00
0506	0514	7541037GL0BPVWRGE	YET WAH RESTAURANT SAN FRANCISCO CA	22.65
0507	0515	7520400GP4MFN6VH0	CHEVRON LOS ANGELES CA	10.00
0507	0515	7825400GK00R3JWHK	JERRYS FAMOUS DELI INC STUDIO CITY CA	17.03
0515	0515	7520700GTX2CLDUBZ	PAYMENT - THANK YOU	418.80-
0513	0521	7520700GYU7N2HKC8	ALEWIFE TAVERN INC NORWELL MA	54.75
0514	0522	7530070GV2H3DJV02	COTTAGE RESTAURANT PROVINCETOWN MA	8.25

PREVIOUS BALANCE	PAYMENTS	CREDITS	CASH ADVANCES	MERCHANT ADVANCES	DEBIT ADJUSTMENTS	FINANCE CHARGE	NEW BALANCE
418.80	418.80	0.00	0.00	713.93	0.00	0.00	713.93

AN AMOUNT FOLLOWED BY A MINUS SIGN (-) IS A CREDIT OR A CREDIT BALANCE UNLESS OTHERWISE INDICATED.

SEND NOTICE OF BILLING ERRORS TO: ROCKLAND TRUST COMPANY 288 UNION ST. ROCKLAND MA 02370

RANGE OF BALANCES TO WHICH RATES APPLY	MONTHLY PERIODIC RATE	ANNUAL PERCENTAGE RATE	BALANCE ON WHICH FINANCE CHARGE WAS COMPUTED IS		CASH ADVANCES OUTSTANDING
ALL	1.500% %	18.00% %	0.00		0.00

MasterCard AY

IF NO CASH ADVANCES ARE OUTSTANDING ON THE DATE YOUR PAYMENT IS CREDITED, YOUR PAYMENT OF NEW BALANCE BY PAYMENT DUE DATE WILL AVOID ADDITIONAL FINANCE CHARGE ON THE NEW BALANCE.

NOTICE: See reverse side for important information.

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APPENDIX B

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METRO

Spit

METRO VIDEO

13

VIDEO LOUNGE

Congressmen Gerry Studds
c/o Gerry Studds for Congress Committee
U.S. House of Representatives
Washington, DC

Dear Sirs:

Enclosed please find a breakdown of the billing and proceeds for 15 April 1984:

Total Door Proceeds on 15 April 1984 (1,486 @ $3)	$ 4459.00
Room Rental	$ 1800.00
Promotion	$ 249.50
Advertisements	
Metro Sunday Times (½ page)	$ 90.00
Bay Window	$ 90.00
AMOUNT DUE	$ 2229.50

Thank you very much for your cooperation in this matter.

Sincerely,

Kyle MacLaughlin
Corporate Controller

8504045523

8504054524

APPENDIX C

Club Café

209 Columbus Ave.

The newest and hottest alternative to Boston's restaurant and bar scene.

Now featuring a full liquor bar with live entertainment Thursday, Friday & Saturday 9pm – midnight and Sunday brunch noon – up.

Happy hour 7days a week 3pm – 7pm
House drinks $1.75
Miller & Lite $1.00

Reservations suggested 536-0966

8504045425

[illegible] support

GERRY STUDDS BENEFIT

23

Proceeds to [illegible]

APPENDIX D

3504054526

8504054527





Metro Sunday Times
7 Lansdowne St. Boston
262-2424

Boston/Worcester

Publisher
George Tamsitt

Art Director
Mike Hoffman

Designer
Kevin McIntire

Sun., May 20 - [illegible] NIGHT
Sun., May 27 - 2 FOR 1 KICKOFF
Sun., June 17 - "A Night to Write"
GAY PRIDE CELEBRATION

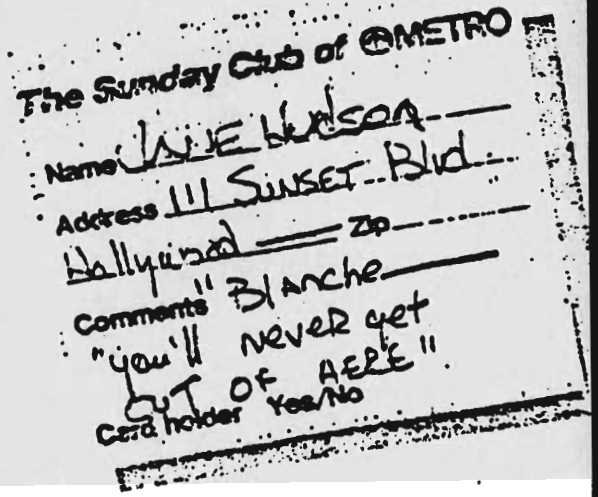
Spit

Thurs., May 3 - BILL NELSON
Wed., May 9 - SOLDIER (Garth
Thurs., May 10 - SPY [illegible]

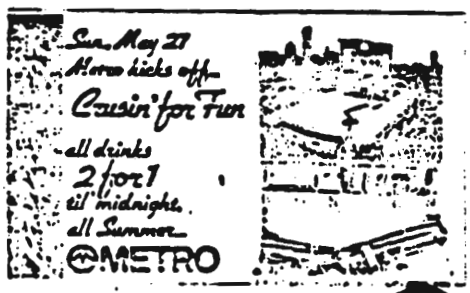
Thurs., May 17 - SKIN
Thurs., May 24 - BOYS & GIRLS
Fri., May 25 - CAMPARI BRANDY NIGHT
Thurs., May 31 - VIOLENT FEMMES

Unfortunately, George Tamsitt was unable to make his deadline this month (due to the KISS-108 party). He'll be back next month. He did want to say --

We regret the fact that we omitted the li "Paid for by Studds for Congress Committe in our April Edition. (April 15 fundraiser







APPENDIX E

8504045228

(27)

THE COMMITTEE TO RE-ELECT
CONGRESSMAN STUDDS

2402

April 24 19 74 53-447 113

PAY TO THE ORDER OF Entertainment, Inc $ 2,229.50

Two Thousand, two hundred and twenty-nine 50/100 DOLLARS

Rockland Trust Company
Rockland, Massachusetts 02370

FOR Use of facilities, promotional activities

Mary Lou Burden

⑆011304478⑆ 3-022-⑈113 "0000222950"

8 5 0 4 0 5 4 4 5 2 9

850405445300

28

8504054531

APPENDIX F

STUDDS TRUST FINANCIAL SUMMARY

CONTRIBUTIONS

Generated by Bradley Letter	23,129.13
Other	19,870.00
Total contributions	42,999.13*
Interest	311.19
	43,310.32

(see bank statements attached)

EXPENDITURES

Legal fees	40,309.56
Reimbursement to Human Rights Campaign Fund	1,768.00
Other operating expenses	1,156.92
Total expenses	43,234.44

(see bank statements and copies of cancelled checks attached)

BALANCE IN ACCOUNT

75.88

*This figure includes one $20.00 deposit made on 7/26/84 for which the bank statement has not been received.

S004054532

Shawmut Banks

STATEMENT OF ACCOUNT

SHAWMUT FIRST COUNTY BANK, N.A.
BRANCH 006
PO BOX 972
BROCKTON MA 02403

(617) 586-5500

413-059-6

TAXPAYER ID NUMBER
04-6495262

STATEMENT PERIOD
06/15/84 THRU 07/17/84

1 ENCLOSED ITEM

NAME
STODDS TRUST
28 ROSA'S LANE
SCITUATE MA 02066

SHAWMUT OFFERS A VARIETY OF SAVINGS AND INVESTMENT PLANS DESIGNED TO SUIT YOUR GO AND NEEDS. FOR MORE INFORMATION CALL 1-800-SHAWMUT OR ASK YOUR PERSONAL BANKER

ACCOUNT SUMMARY 200

TYPE OF ACCOUNT	BEGINNING BALANCE	CHECKS/ DEBITS	DEPOSITS/ CREDITS	ENDING BALANCE
MONEY MARKET DEP	360.36	305.00	.52	55.8

ACCOUNT NUMBER
MONEY MARKET DEPOSIT ACCOUNT 10-413-059-6

DAILY BALANCE

******CHECKS******

NUMBER	DATE	AMOUNT
112	06/18	305.00

1 CHECK TOTALING 305.00

DATE	ENDING BALANCE
06/18	55.6
06/25	55.7
07/02	55.7
07/09	55.8
07/16	55.8

******OTHER DEBITS******

NONE

******DEPOSITS/CREDITS******

	DATE	AMOUNT
INTEREST PAID	06/18	.28
INTEREST PAID	06/25	.06
INTEREST PAID	07/02	.06
INTEREST PAID	07/09	.06
INTEREST PAID	07/16	.06

5 DEPOSITS/CREDITS TOTALING .52

INTEREST PAID YEAR TO DATE 84.89

THE INTEREST PAID TO YOUR ACCOUNT WILL BE 5.2500% WHENEVER BALANCE FALLS BELOW $2,500.00

31

Shawmut Banks

STATEMENT OF ACCOUNT

SHAWMUT FIRST COUNTY BANK, N.A.
BRANCH 006
PO BOX 972
BROCKTON MA 02403

(617) 586-5500

413-059-6

TAXPAYER ID NUMBER
04-6495262

05/15/84 THRU 06/15/84

1 ENCLOSED ITEM

PREPARED FOR
STUDDS TRUST
38 ROSA'S LANE
SCITUATE MA 02066

**********HERE IS YOUR NEW STATEMENT!**********
NOW YOUR PAID CHECKS ARE LISTED IN NUMERICA
ORDER TO MAKE BALANCING YOUR CHECKBOOK FAST
AND EASIER THAN EVER.

20047

TYPE OF ACCOUNT	BEGINNING BALANCE	CHECKS/ DEBITS	DEPOSITS/ CREDITS	ENDING BALANCE
MONEY MARKET DEP	517.53	463.00	305.83	360.36

MONEY MARKET DEPOSIT ACCOUNT 10-413-059-6

**********CHECKS**********

NUMBER	DATE	AMOUNT	NUMBER	DATE	AMOUNT
118	05/24	463.00			

1 CHECK TOTALING 463.00 ✓

**********OTHER DEBITS**********

NONE

**********DEPOSITS/CREDITS**********

	DATE	AMOUNT
INTEREST PAID	05/21	.52
INTEREST PAID	05/25	.19
INTEREST PAID	06/04	.06
INTEREST PAID	06/11	.06
DEPOSIT	06/12	305.00 ✓

5 DEPOSITS/CREDITS TOTALING 305.83

DATE	ENDING BALANCE
05/21	518.05
05/24	55.05
05/25	55.24
06/04	55.30
06/11	55.36
06/12	360.36

INTEREST PAID YEAR TO DATE 84.37

THE INTEREST PAID TO YOUR ACCOUNT WILL BE 5.25% WHENEVER
BALANCE FALLS BELOW $2,500.00

32

Shawmut
First County Bank, N.A.
Brockton, MA 02403

STATEMENT OF ACCOUNT

STUDDS TRUST
38 RUSA'S LANE
SCITUATE MA 02066

05/15/04

05/0..

NOW AND SAVINGS INTEREST SUMMARY

DEPOSITS OR CREDITS	CHECKS OR PAYMENTS	DATE	BALANCE
WEEKLY MARKET DEPOSIT ACCT 35-043-55-0			PREVIOUS
	24.03	05/04	24.03
	.18 IN	05/07	24.21
ANNUAL INTEREST RATE IS 0.4000% AS OF 05/07/04			
	493.00	05/13	517.21
	.32 IN	05/14	517.53
ANNUAL INTEREST RATE IS 0.4000% AS OF 05/14/04			

WEEKLY RATE CHANGE
THE ANNUAL INTEREST RATE IS 0.40% WHILE YOUR BALANCE REMAINS BELOW $ 2,500.00

3504054535

THIS STATEMENT AND ACCOMPANYING STATEMENT IS IMPORTANT
PLEASE SEE FOR ADDITIONAL DETAILS AB... MAINTE...

33

Shawmut
First County Bank
[illegible] Main St. Brockton, MA 02403

STATEMENT OF ACCOUNT

[illegible]

STUDDS TRUST
35 ROSA'S LANE
SCITUATE MA 02066

05/02/04

04/17

NEW BALANCE	MINIMUM PAYMENT	PAYMENT DUE DATE	NOW AND SAVINGS INTEREST SUMMARY	
.00			PAID TO DATE THIS YEAR	STATEMENT NUMBER
			03.04	04-6495262

ACCOUNT SUMMARY					
PREVIOUS BALANCE	DAILY PERIODIC RATE	FINANCE CHARGE	ANNUAL PERCENTAGE RATE	AVERAGE DAILY BALANCE	PAYMENTS AND OTHER CREDITS

CHECKS PAID OR DEBITS		DEPOSITS AND OTHER CREDITS		BALANCES
MONEY MARKET DEPOSIT ACCT [illegible]-413-[illegible]-[illegible]		PREVIOUS BALANCE		550.42
		.03IN	04/23	550.97
THE ANNUAL INTEREST RATE IS [illegible] AS OF 04/23/04				
		440.00	04/23	990.97
		70.00	04/30	1,060.97
		.86IN	04/30	1,061.83
THE ANNUAL INTEREST RATE IS [illegible] AS OF 04/30/04				
7.00			05/01	1,054.03
1,[illegible].03			05/02	.00

WEEKLY RATE CHANGE
THE ANNUAL INTEREST RATE IS [illegible]% WHILE YOUR BALANCE REMAINS BELOW $ 2,500.00

[illegible] AND ACCOUNTING [illegible]
[illegible] FOR A [illegible]

8504054536

(34)

Shawmut
First County Bank, N.A.
Main St., Brockton, MA 02403

STATEMENT OF ACCOUNT

13-059-6

STUDDS TRUST
38 ROSA'S LANE
SCITUATE MA 02066

STATEMENT DATE
04/17/84

03/15

SUMMARY OF NEW BALANCES

PREVIOUS BALANCE	DEPOSITS	SAVINGS	NOW AND SAVINGS INTEREST SUMMARY PAID TO DATE THIS YEAR	TAXPAYER ID NUMBER
550.42			81.63	04-6695262

INTEREST SUMMARY AVERAGE DAILY BALANCE	ANNUAL PERCENTAGE RATE	FINANCE CHARGE	ANNUAL PERCENTAGE RATE	INCREASE CREDIT	PAYMENT AMOUNT AND DATE DUE

CHECKS PAID OR DEBITS	DEPOSITS OR CREDITS	DATE	BALANCE
ONEY MARKET DEPOSIT ACCT 10-413-059-6	PREVIOUS BALANCE		1,270.93
	1.28IN	03/19	1,272.21
IE ANNUAL INTEREST RATE IS 05.2500% AS OF 03/19/84			
	1.28IN	03/26	1,273.49
IE ANNUAL INTEREST RATE IS 05.2500% AS OF 03/26/84			
	2,487.00	04/02	3,760.49
	1.40IN	04/02	3,761.89
IE ANNUAL INTEREST RATE IS 08.6000% AS OF 04/02/84			
IE ANNUAL INTEREST RATE IS 09.0000% AS OF 04/03/84			
76.60		04/09	3,685.29
	5.47IN	04/09	3,691.76
NE ANNUAL INTEREST RATE IS 09.0000% AS OF 04/09/84			
14.31		04/11	3,677.45
130.00		04/11	3,547.45
3,000.00		04/13	547.45
	2.97IN	04/13	550.42
IE ANNUAL INTEREST RATE IS 05.2500% AS OF 04/13/84			

WEEKLY RATE CHANGE
THE ANNUAL INTEREST RATE IS 5.25% WHILE YOUR BALANCE REMAINS BELOW $ 2,500.00

NOTICE: SEE OTHER SIDE AND ACCOMPANYING STATEMENT FOR IMPORTANT INFORMATION.
SEE OUR NOTICES FOR ADDITIONAL DETAILS ABOUT YOUR ACCOUNT.

35

Shawmut
First County Bank, N.A.
[illegible] Main St., Brockton, MA 02403

[illegible] STATEMENT OF ACCOUNT

[illegible]

STUDDS TRUST
39 RUSA'S LANE
SCITUATE MA 02066

STATEMENT DATE 03/15/84

DATE OF LAST STATEMENT 02/15

PREVIOUS BALANCE	SUPPLIANCE	DEPOSITS	PAID TO DATE THIS YEAR	TAXPAYER ID NUMBER
1,270.93			58.23	[illegible]5526

AVERAGE DAILY BALANCE	DAILY PERIODIC RATE	FINANCE CHARGE	ANNUAL PERCENTAGE RATE	AVAILABLE CREDIT	PAYMENT AMOUNT AND DATE DUE

	CHECKS PAID OR DEBITS	DEPOSITS AND OTHER CREDITS		BALANCE
	MONEY MARKET DEPOSIT ACCT 10-413-059-0	PREVIOUS	BALANCE	7,911.73
		11.24IN	02/17	7,922.97
1E	ANNUAL INTEREST RATE IS 08.0000% AS OF 02/17/84			
		6,513.00	02/21	14,435.97
		20.58IN	02/27	14,456.55
1E	ANNUAL INTEREST RATE IS 08.0000% AS OF 02/27/84			
		1,222.89	03/05	15,679.44
		21.60IN	03/05	15,701.04
0E	ANNUAL INTEREST RATE IS 08.0000% AS OF 03/05/84			
		5,171.50	03/06	20,872.54
1E	ANNUAL INTEREST RATE IS 08.0000% AS OF 03/06/84			
	12,300.00		03/07	8,202.01
	7,000.00		03/09	1,202.01
1E	ANNUAL INTEREST RATE IS 08.0000% AS OF 03/09/84			
		7.80IN	03/12	1,270.93
1E	ANNUAL INTEREST RATE IS 08.0000% AS OF 03/12/84			
4				
5	WEEKLY RATE CHANGE THE ANNUAL INTEREST RATE IS 5.00% WHILE YOUR BALANCE REMAINS BELOW $ 2,500.00			
0				
4				
0				
5				
8				

[illegible] AND ACCOMPANYING STATEMENT [illegible]
[illegible] NOTICES FOR ADDITIONAL DETAILS [illegible]

36

Shawmut
First County Bank, N.A.
[illegible] St. Brockton, MA 02403

STATEMENT OF ACCOUNT

3-059-6 d

STUDDS TRUST
38 KOSA'S LANE
SCITUATE MA 02066

STATEMENT DATE 02/15/84

PAGE 01/17

SUMMARY BALANCES					
PREVIOUS BALANCE	SUBTRACTIONS	DEPOSITS	FOR 365 DAYS THIS YEAR	TAXPAYER ID NUMBER
7,311.73			6.90	04-6495262

PERCENTAGE SUMMARY				
AVERAGE DAILY BALANCE	DAY PERIODIC RATE	FINANCE CHARGE ANNUAL PERCENTAGE RATE	AVAILABLE CREDIT	PAYMENT AMOUNT AND DATE DUE

CHECKS PAID OR DEBITS	DEPOSITS OR PAYMENTS	INTEREST RATE	BALANCES
QUID INVESTMENT ACCOUNT 10-413-059-6		PREVIOUS BALANCE	1,110.35
	1.12IN	01/23	1,111.47
E ANNUAL INTEREST RATE IS 05.2500% AS OF 01/23/84			
	40.00	01/30	1,151.47
	1.12IN	01/30	1,152.59
E ANNUAL INTEREST RATE IS 05.2500% AS OF 01/30/84			
	1.16IN	02/06	1,153.75
E ANNUAL INTEREST RATE IS 05.2500% AS OF 02/06/84			
	6,156.74	02/13	7,310.49
	1.24IN	02/13	7,311.73
E ANNUAL INTEREST RATE IS 08.0000% AS OF 02/13/84			
ANNUAL INTEREST RATE IS 08.0500% AS OF 02/14/84			

WEEKLY RATE CHANGE
THE ANNUAL INTEREST RATE IS 5.25% WHILE YOUR BALANCE REMAINS BELOW $ 2,500.00

8504054 M2

[illegible] SHEET ACCOMPANYING STATEMENT [illegible]
[illegible] SEE FOR ADDITIONAL DETAILS [illegible]

37

Shawmut
First County Bank, N.A.

STATEMENT OF ACCOUNT

8504054549

Shawmut
First County Bank, N.A

STATEMENT OF ACCOUNT

8504054454141

Shawmut
First County Bank, N.A.
... Brockton MA 02403

...IT OF ACCOUNT

...-...-5

STUDDS TRUST
38 RUSA'S LANE
SCITUATE MA 02066

11/16/83

...

10/18

9,093.51		148.57	040-47-5202

		FINANCE CHARGE	ANNUAL PERCENTAGE RATE	

8504542	STUDD INVESTMENT ACCOUNT 10-413-059-6		PREVIOUS BALANCE	8,724.49
		20.00	10/20	8,744.49
		13.98IN	10/24	8,758.47
	ANNUAL INTEREST RATE IS 08.1000% AS OF 10/24/83			
	ANNUAL INTEREST RATE IS 08.0000% AS OF 10/25/83			
	3.32		10/25	8,760.64
		120.00	10/26	8,880.64
		200.00	10/31	9,080.64
		13.48IN	10/31	9,094.12
	ANNUAL INTEREST RATE IS 08.0000% AS OF 10/31/83			
		20.00	11/02	9,114.12
		150.00	11/04	9,264.12
		14.01IN	11/07	9,278.13
	ANNUAL INTEREST RATE IS 08.0000% AS OF 11/07/83			
		100.00	11/08	9,378.13
	107.40		11/08	9,270.73
	ANNUAL INTEREST RATE IS 07.9000% AS OF 11/08/83			
	190.59-		11/09	9,079.74
		13.77IN	11/14	9,093.51
	ANNUAL INTEREST RATE IS 07.9000% AS OF 11/14/83			

WEEKLY RATE CHANGE
THE ANNUAL INTEREST RATE IS 5.25% WHILE YOUR BALANCE REMAINS BELOW $ 2,500.00

OF

(40)

Shawmut
First County Bank, N.A.
Brockton, MA 02403

STATEMENT OF ACCOUNT

[illegible]
[illegible] TRUST
38 ROSA'S LANE
SCITUATE MA 02066

[illegible]

3,724.95			9.73	045-49-5.00

DATE	FINANCE CHARGE	ANNUAL PERCENTAGE RATE

[illegible]	INVESTMENT ACCOUNT [illegible]	PREVIOUS BALANCE		14,520.00
		220.00 +	09/19	14,740.00
		17.33 +	09/19	14,757.33
	ANNUAL INTEREST RATE IS [illegible] AS OF 09/19/93			
		100.00 +	09/22	14,857.33
		220.00 +	09/22	15,077.33
		100.00 +	09/23	15,177.33
		270.00 +	09/26	15,447.33
		20.38 +	09/26	15,467.71
	ANNUAL INTEREST RATE IS [illegible] AS OF 09/26/93			
	ANNUAL INTEREST RATE IS [illegible] AS OF 09/27/93			
		100.00 +	09/29	15,567.71
		220.00 +	09/29	15,787.71
		170.00 +	09/30	15,957.71
		[illegible]	10/03	15,[illegible]
	ANNUAL INTEREST RATE IS [illegible] AS OF 10/03/93			
		170.00 +	10/04	16,301.04
	ANNUAL INTEREST RATE IS [illegible] AS OF 10/04/93			
		[illegible]	10/05	16,[illegible]
[illegible]			10/06	6,316.04
		400.00 +	10/07	6,716.04
		1,000.00 +	10/07	7,716.04
		14.51 +	10/07	7,730.55
	ANNUAL INTEREST RATE IS [illegible] AS OF 10/07/93			
[illegible]			10/11	7,317.[illegible]
	ANNUAL INTEREST RATE IS [illegible] AS OF 10/11/93			
		250.00 +	10/12	7,577.[illegible]
		300.00 +	10/17	7,877.[illegible]
105.00 +			10/17	7,711.00
		13.[illegible] +	10/17	7,724.95
	ANNUAL INTEREST RATE IS [illegible] AS OF 10/17/93			

WEEKLY RATE CHANGE
THE ANNUAL INTEREST RATE IS [illegible] WHILE YOUR BALANCE [illegible] BELOW $ 2,500.00

(41)

Shawmut
First County Bank.N.A
Main St Brockton MA 02403

STATEMENT OF ACCOUNT

[illegible] TRUST
[illegible]
[illegible] MA 2[illegible]

[illegible]/15/[illegible]

14,[illegible]21.[illegible]			.00	

FINANCE CHARGE | ANNUAL PERCENTAGE RATE

INV	INVESTMENT ACCOUNT 10-413-059-[illegible]		PREVIOUS BALANCE	.00
		1,960.00	09/14	1,[illegible].00
		12,560.00	09/14	14,521.00

[illegible] ANNUAL INTEREST RATE IS [illegible].52004. AS OF 09/14/[illegible]

WEEKLY RATE CHANGE
THE ANNUAL INTEREST RATE IS [illegible].56 WHILE YOUR BALANCE REMAINS
OVER $ 2,500.00

8504054454

NOTICE [illegible] AND ACCOMPANYING STATEMENT [illegible]
[illegible] FOR ADDITIONAL DETAILS [illegible]

(42)

Internal Revenue Service

Date of This Notice

CB242683

If you inquire about your account, please refer to this number or attach a copy of this notice ▶

10-13-83

Employer Identification Number

04-6495262

GERRY E STUDDS LEGAL SERVICES TRUST
STUDDS TRUST
MARY LOU BUTLER TR
36 ROSAS LA
SCITUATE MA 02066

575 B 555555155
55555555

8504045455

NOTICE OF NEW EMPLOYER IDENTIFICATION NUMBER ASSIGNED

Thank you for your application for an employer identification number. The number above has been assigned to you. We will use it to identify your business tax returns and any other related documents, even if you have no employees.

Please keep this number in your permanent records. Use the number and your name, exactly as shown above, on all Federal tax forms that require this information, and refer to the number in all tax payments and in tax-related correspondence or documents. You may wish to make a record of the number for reference in case this notice is lost or destroyed.

Note that the assignment of this number does not grant tax-exempt status to nonprofit organizations. For details on how to apply for this exemption, see IRS Publication 557, Tax-Exempt Status for Your Organization, available at most IRS offices.

We appreciate your cooperation.

(43)

CASHIER'S CHECK

Shawmut
First County Bank NA

CUSTOMER COPY

010491

5-2-1984

Human Rights Campaign Fund********** 1,000.00

NON-NEGOTIABLE

AUTHORIZED SIGNATURE

STUDD'S TRUST 118

May 10 84

53-150/113

Human Rights Campaign Fund Inc

One thousand and thirty six 00/100

Shawmut
First County Bank, N.A.
Brockton, Massachusetts 02403

LIQUID INVESTMENT ACCOUNT

Mary Ann Studd Trustee

⑆011301507⑆ ⑈104130596⑈ 0118 "0000046300"

STUDD'S TRUST 119

June 10 84

53-150/113

Human Rights Campaign Fund 305.00

Three Hundred and five 00/100

Shawmut
First County Bank, N.A.
Brockton, Massachusetts 02403

LIQUID INVESTMENT ACCOUNT

Mary Ann Studd Trustee

⑆011301507⑆ ⑈104130596⑈ 0119 "0000030500"

STUDD'S TRUST 114

53-150 113

(44)

STUDD'S TRUST NO 107

12-21-83 [illegible] 53-150/113

PAY TO THE ORDER OF Mary Lou Butler $ 196.35

One Hundred and ninety-six DOLLARS 35/100 CENTS

Shawmut First County Bank, N.A. Brockton, Massachusetts 02403

LIQUID INVESTMENT ACCOUNT

MEMO

Mary Lou Butler

⑈011301507⑈ ⑈104130596⑈ 0107 ⑈0000019635⑈

1 2 3

504

STUDD'S TRUST NO 108

12-23-83 [illegible] 53-150/113

Dec 12 19 83

PAY TO THE ORDER OF Mahoney, Hawkes & Goldings $ 8,000.00

Eight Thousand DOLLARS 00/100 CENTS

Shawmut First County Bank, N.A. Brockton, Massachusetts 02403

LIQUID INVESTMENT ACCOUNT

MEMO Legal fees

Mary Lou Butler

⑈011301507⑈ ⑈104130596⑈ 0108 ⑈0000800000⑈

1 2 3

1.50 Deds.

STUDD'S TRUST NO 110

03-07-84 [illegible] 53-150/113

Feb 29 19 84

PAY TO THE ORDER OF Mahoney, Hawkes & Goldings $ 12,309.52

Twelve Thousand, three hundred nine DOLLARS 52/100 CENTS

Shawmut First County Bank, N.A. Brockton, Massachusetts 02403

LIQUID INVESTMENT ACCOUNT

MEMO

Mary Lou Butler

⑈011301507⑈ ⑈104130596⑈ 0110 ⑈0001230952⑈

STUDD'S TRUST NO 111

March 6 19 84 53-150/113

PAY TO THE ORDER OF Mahoney Hawkes & Goldings $ 7,000.00

Seven Thousand DOLLARS 00/100 CENTS

Shawmut First County Bank, N.A. Brockton, Massachusetts 02403

LIQUID INVESTMENT ACCOUNT

45

Check # 53-150/113,

Commonwealth of Massachusetts

Trustees

31/100

Shawmut
First County Bank, N.A.
Brockton, Massachusetts 02403

LIQUID INVESTMENT ACCOUNT

Treasurer

⑆011301507⑆ ⑈104130596⑈ 0102 ⑈000000431⑈

STUDD'S TRUST

115

April 9 84

53-150/113,

Postmaster

130 00

One hundred and thirty

None

Shawmut
First County Bank, N.A.
Brockton/Massachusetts 02403

LIQUID INVESTMENT ACCOUNT

Treasurer

⑆011301507⑆ ⑈104130596⑈ 0115 ⑈000013000⑈

8504054548

STUDD'S TRUST

109

Dec 31 84

53-150/113,

Postmaster - Brockton

2680

Twenty-six

80/100

Shawmut
First County Bank, N.A.
Brockton, Massachusetts 02403

LIQUID INVESTMENT ACCOUNT

13 stamps

Treasurer

⑆011301507⑆ ⑈104130596⑈ 0109 ⑈000002680⑈

STUDD'S TRUST

116

April 17 84

53-150/113,

Postmaster - Stony

Brook

7.80

Seven

80/100

Shawmut
First County Bank, N.A.
Brockton, Massachusetts 02403

LIQUID INVESTMENT ACCOUNT

2 stamps

Treasurer

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APPENDIX G

DAN J. BRADLEY
PO BOX 1396
WASHINGTON, D.C 20013

L.74:

Boston, MA 02114

Dear Friend,

On July 14, U.S. Congressman Gerry Studds (D-MA) walked to the lectern on the floor of the House of Representatives and delivered in strong, confident tones a statement unlike any previously made in our national legislature:

> "All Members of Congress," said Studds, "must cope with the challenge of initiating and maintaining a career in public office without destroying entirely the ability to lead a meaningful and emotionally fulfilling private life. It is not a simple task for any of us to meet adequately the obligations of either public or private life, let alone both. But these challenges are made substantially more complex when one is, as am I, both an elected public official and gay."

With those words, Congressman Studds became the first member of Congress to publicly affirm his homosexuality.

Studds' historic statement came during the course of his response to charges made by the House Committee on Standards of Official Conduct that he had engaged in an improper sexual relationship with a 17-year-old male page in 1973, during his first term in office.

Studds was not the first public official to have difficulties related to homosexual activity, but he was the first not to hide from his own identity; the first not to cite "alcoholism," "drug problems," "psychological pressures," or even "homosexual tendencies" as an excuse. Gerry Studds just admitted to an error in judgement, and stated without shame or sorrow that he is gay.

In so doing, Studds set a standard for courage and dignity that will make it far easier for others to be open about being gay. His speech on the floor prompted thousands of letters congratulating him for his decision, and expressing gratitude for the strength and eloquence of his words. Let me quote from three of those letters:

> "I saw, heard and re-read many times your speech to the House. I was dumbstruck, and moved to tears by your courage, pride, honesty, poise and resoluteness. If I ever, myself, rise even half so well to half so trying a moment, I think I shall consider my life, to that moment, a success and my dues -- such as any might reckon them -- fully paid. At last, a Congressman I can look up

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"When I heard your statement to Congress on NPR recently, I lofted my sheetrock hammer across the room and cheered. A Congressman comes out with class! -- sure, measured voice, no half-baked apologies, "gay" rather than "homosexual." You have my deep respect for transforming what must be a lonely, traumatic event into a noble moment for us all...you have done a fine and brave thing for all of us." -- From North Carolina

"I was proud of you today when I saw you standing before the House making your precise, fine-tuned statement. I was proud of the way you looked, proud of what you said, proud of the way you said it. You affirmed my/our complex presence in this world. I am sorry that such an affirmation is contingent on what is clearly a painful and embarassing time for you and those you love. Thank you for not running away. Thank you for your courageous, public, personal response...There are millions of gay people, who are prouder of themselves because of the way you have chosen to publicly respond to the realities of your life." -- From Oregon

Gerry Studds' decision to be honest and open about himself was, he says, personally the best thing he has ever done. He feels great.

But, not everyone understands. It is likely that the refusal by Congressman Studds to be more visibly contrite about his past mistake, and about his sexual preference, in general, contributed to the decision by the House of Representatives to vote to censure him on the House floor. It is likely, as well, that the investigation concerning Studds which was made by the House Committee on Standards of Official Conduct, was far more extensive and exhaustive than it would have been if a heterosexual relationship had been involved. Consider, for example, that the Committee began investigating charges concerning misbehavior by Members of Congress in 1981 and 1982. How much time and how much work did it take to inquire all the way back to 1973 to expose a relationship which was, even according to the Committee, without coercion, which did not involve any preferential treatment, express or implied, which did not include any harassment of any kind, and which involved a young man who was for legal purposes, an adult?

During the course of its investigation, the Committee spent hundreds of thousands of dollars and interviewed hundreds of people, inquiring into virtually every phase of Congressman Studds' personal life for the past ten years. At the start, Studds refused to hire a lawyer. But ultimately, as the investigation went on, and friends and staff members were subjected to repeated interrogation, he relented. The legal bills ultimately exceeded $40,000, money Studds does not have.

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Recently, a group of supporters from Congressman Studds' district in Massachusetts, from Washington, and elsewhere around the country, established a Trust Fund to help defray these legal expenses. About one-half the money has already been raised. I would like to ask you to join in making a contribution to this Trust, the proceeds from which will be used exclusively to re-pay these legal fees.

By making such a contribution, you will do far more than help alleviate this debt. You will be telling Gerry Studds that you appreciate his decision to tell the truth about his sexuality, and his determination to insist that sexual preference is irrelevant to a person's performance in professional life.

In addition, you will bolster the groundswell of sentiment within the Gay Community -- a sentiment matched only by Studds' own Massachusetts constituents -- that he should run for re-election this fall. That decision will be, for him, an enormously difficult and intensely personal choice. A political campaign is always arduous under any circumstances, but in 1984, for Gerry Studds, it promises to be brutal indeed.

I know Gerry Studds, and I have followed with interest his career in Congress. During his 12 years in office, he has gained a reputation for hard work, accessibility, personal honesty, and intense dedication to the vital economic and environmental concerns of his district encompassing the southeastern Massachusetts coast. Above all, Congressman Studds has displayed throughout his career the kind of eloquence and wit so rarely found in politics today; an eloquence which has made him one of our most persuasive defenders of human rights and civil liberties both within the United States and in international affairs; and which -- as evidenced by his speech last July 14 -- grants him the ability to communicate his ideas with a unique and commanding strength.

Congressman Studds' constituents agree. After barely winning election for the first time in 1972, he has steadily increased his margin of victory. In 1982, he received 68 percent of the vote, and carried every town and precinct in his district.

But 1984 promises to be very different and a far more difficult kind of campaign. Several local politicians have announced their intention to campaign for Studds' seat, and he has been targeted by right-wing organizations as a prime candidate for defeat.

I believe it is important that Gerry Studds be re-elected. He is a superb Congressman. Our country needs many more with his talen and dedication. Simply by doing his job the way he has in the past, Studds will be serving his constituents, and making it easier every day for all of us to argue openly that sexual preference is no bar to competence, effectiveness or public respect.

A contribution to the Studds Trust Fund will have an important practical effect. It will tell Congressman Studds that he has the

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support he needs to make it through the year ahead. It will let him know that we deeply admire and respect the way he handled himself during the investigation and House vote. He has given thousands of gay men and lesbians who have faced similar allegations and inquiries into their personal lives reason to be proud.

By making a contribution to the Studds Trust Fund, you can send Gerry Studds your vote of confidence, to encourage him to run in 1984. You can send a message of friendship and support to a hard-working congressman who deserves the very best. Please make your check payable to the Studds Trust Fund and send it to my attention, c/o Dan J. Bradley, Co-Chair, Human Rights Campaign Fund, P.O. Box 1396, Washington, D.C 20013.

Thank you for your continued support of the Human Rights Campaign Fund.

Sincerely,

Dan J Bradley

Dan J. Bradley
Co-Chair
Human Rights Campaign Fund

P.S. Congressman Gerry Studds is a co-sponsor of the federal gay civil rights legislation. He has spoken out frequently on issues of concern to gay men and lesbians.

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I want Congressman Studds to know how much I admire and respect the stand he took in Congress. Enclosed is my check of:

☐ $25 ☐ $50 ☐ $75 ☐ $100 ☐ Other _____

Keep up the good work!

Make check payable to:
Studds Trust Fund.
Send it with this form to
c/o Dan J. Bradley, P.O. Box 1396,
Washington, D.C. 20013.

Check one, to charge your remittance:

☐ MasterCard ☐ Visa

_____
Your credit card number (All digits, please)

Mo _____ Yr _____
Credit Card
valid thru

_____
(Your Signature)

NO POSTAGE NECESSARY IF MAILED IN THE UNITED STATES

BUSINESS REPLY MAIL
FIRST CLASS PERMIT NO. 12998 WASHINGTON, D.C.

POSTAGE WILL BE PAID BY.

DAN J. BRADLEY
c/o HRCF
P.O. Box 1396
Washington, D.C. 20013

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OCC#5912

9406 Biltmore Drive
Silver Spring, MD 20901

84 DEC 10 P3:36

December 10, 1984

RE: MUR 1744
Response to the Commission's
"reason to believe" finding

Dear Ms. White:

This letter responds to the Commission's letter of October 23, 1984 in which the Commission indicated that it has made a preliminary finding of reason to believe that the Studds Trust Fund ("the Trust") was a political committee and had failed to file registration and reporting statements as required by the Federal Election Campaign Act ("the Act").

By this letter, the Trust emphatically denies that it has violated any provisions of the Act. For the reasons set out in the response in MUR 1744 of the Committee to Re-Elect Congressman Studds and Edwin M. Martin, Jr. (dated December 10, 1984), pages 3-8, the Trust has fully complied with the conditions set out in Advisory Opinion 1983-21, and has neither raised nor spent any funds for the purpose of influencing a federal election.* Thus, the Trust is not a political committee and is not subject to the registration and reporting requirements of the Act.

This concludes our response to the Commission's reason to believe finding in MUR 1744. The Commission has no legal or factual basis for the charges against the Studds Trust. The Commission therefore should find that no violation has occurred and vote to close the file.

Should you decide that any issues remain unresolved, we request the opportunity to begin conciliation proceedings as soon as possible, and in any event before the probable cause stage of the enforcement process.

Please write or call if we can be of any further assistance.

Sincerely,

Andrew Buchsbaum
Counsel for the Studds Trust

Ms. Maura White
Office of the General Counsel
Federal Elections Commission
1325 K Street, NW
Washington, DC 20463

*We hereby incorporate by reference the Response to the Commission's reason to believe finding of the Committee to Re-Elect Congressman Studds and Mr. Edwin Martin, Jr. in MUR 1744 (December 10, 1984).

Attachment 3 (53)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Andrew Buschbaum, Esquire
9406 Biltmore Drive
Silver Spring, MD 20901

RE: MUR 1744
Committee to Re-Elect
Congressman Studds; Edwin
M. Martin, Jr., as treasurer;
Studds Trust Fund

Dear Mr. Buschbaum:

On October 16, 1984, the Commission found reason to believe that your clients, the Committee to Re-Elect Congressman Studds ("Committee") and Edwin M. Martin, Jr., as treasurer, violated 2 U.S.C. §§ 441b(a), 434(b)(5)(A), and 434(b)(3)(B), and 11 C.F.R. §§ 104.13 and 104.3(b)(4)(i) and (A). In addition, the Commission determined that your client, the Studds Trust Fund, violated 2 U.S.C. §§ 433 and 434. You subsequently submitted a response to the Commission's finding on behalf of each of your clients.

After considering the circumstances of this matter the Commission determined on , 1985, to take no further action against the Committee and Edwin M. Martin, Jr., as treasurer, with respect to a violation of 2 U.S.C. § 441b(a). The Commission also determined on , 1985, to find reason to believe the Committee and Edwin M. Martin, Jr., as treasurer, violated 2 U.S.C. § 441d with respect to the advertisement in the Metro Sunday Times and determined to take no further action with respect to this issue.

At your request, the Commission determined on , 1985, to enter into negotiations with your clients directed towards reaching conciliation agreements in settlement of this matter prior to finding of probable cause to believe.

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Attachment 4

Enclosed are conciliation agreements that the Commission has approved in settlement of this matter. If your clients agree with the provisions of the enclosed agreements, please sign and return them, 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 agreements, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Maura White, the staff member assigned to this matter, at 523-4143.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosures

8504054557

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Jeffrey M. Freedman, Esquire
Brown, Rudnick, Freed and Gesmer
One Federal Street
Boston, MA 02110

RE: MUR 1744

Dear Mr. Freedman:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission on October 16, 1984, found reason to believe that your client, Metro (That's Entertainment Inc.) violated 2 U.S.C. § 441b(a), a provision of the Federal Election Campaign Act of 1971 as amended, and instituted an investigation or this matter. On November 9 and 13, 1984, you submitted a response to the Commission's finding on behalf of your client.

After considering the circumstances of this matter the Commission determined on , 1985, to take no further action against Metro, and close the file as it pertains to Metro. The Commission reminds you that the corporation's declaration of support of a federal candidate in an advertisement nevertheless appears to be a violation of 2 U.S.C. § 441b(a). Your client should take immediate steps to insure that this activity does not occur in the future.

The confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

The file will be made public within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any materials to appear on

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the public record, please do so within ten days of your receipt of this letter.

Should you have any questions, please contact Maura White, the staff member assigned to handle 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/JODY C. RANSOM

DATE: DECEMBER 26, 1984

SUBJECT: MUR 1744 - Comprehensive Investigative Report #1 signed December 20, 1984

The above-captioned matter was circulated to the Commission on a 24 hour no-objection basis at 2:00, December 21, 1984.

There were no objections to the Comprehensive Investigative Report at the time of the deadline.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary

FROM: Office of General Counsel

DATE: December 21, 1984

SUBJECT: MUR 1744 - Comprehensive Investigative Report #1

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	[X]	Litigation	[ ]
Sensitive	[X]		
Non-Sensitive	[ ]	Closed MUR Letters	[ ]
Information	[ ]	Status Sheets	[ ]
Sensitive	[ ]		
Non-Sensitive	[ ]	Advisory Opinions	[ ]
Other	[ ]	Other (see distribution below)	[ ]

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SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
OFFICE OF THE FEC
COMMISSION SECRETARY

84 DEC 21 A8:58

In the Matter of	)	
	)	
Committee to Re-Elect Congressman Studds; Edwin M. Martin, Jr., as treasurer; Human Rights Campaign Fund; Victor J. Basile, as treasurer; Studds Trust Fund; Metro	)	MUR 1744

COMPREHENSIVE INVESTIGATIVE REPORT #1

On July 24, 1984, Peter Y. Flynn filed a complaint against the Committee to Re-Elect Congressman Studds ("Committee") and its treasurer, Edwin M. Martin, Jr., the Studds Trust Fund, the Human Rights Campaign Fund and its treasurer, Victor J. Basile, and Metro. On October 16, 1984, the Commission determined that there is reason to believe the Committee and its treasurer violated 2 U.S.C. §§ 441b(a), 434(b)(5)(A), and 434(b)(3)(B), and 11 C.F.R. §§ 104.3(b)(4)(i), 104.3(b)(4)(i)(A) and 104.13. The Commission also determined that there is reason to believe: Metro (7-9 Landsdowne Corp.) violated 2 U.S.C. § 441b(a); the Human Rights Campaign Fund and Victor J. Basile, as treasurer, violated 2 U.S.C. § 434(b)(6)(B)(i); and, the Studds Trust Fund violated 2 U.S.C. §§ 433 and 434. Notification of the Commission's finding was mailed to the respondents on October 23, 1984.

On November 2, 1982, counsel for Metro submitted a request for a ten day extension of time to respond to the Commission's finding; the request was granted by letter dated November 9, 1984. The Human Rights Campaign Fund and its treasurer responded to the Commission's finding on November 6, 1984. On November 8, 1984, the Committee and its treasurer requested a 30 day

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extension of time to respond. Counsel for the Committee was advised on November 13, 1984, that the requested extension had been granted and that the Committee's response was due on December 10, 1984. Both the Committee's response and the response of the Studds Trust Fund were submitted on December 10, 1984.

This office is in the process of reviewing the respondents' responses in this matter and will prepare a report to the Commission containing specific recommendations.

Charles N. Steele
General Counsel

Dec. 20, 1984
Date

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

8504045663

RECEIVED
OFFICE OF
GENERAL COUNSEL
84 DEC 10 P3:36

GCC#5912

9406 Biltmore Drive
Silver Spring, MD 20901

December 10, 1984

RE: MUR 1744
Response to the Commission's
"reason to believe" finding

Dear Ms. White:

This letter responds to the Commission's letter of October 23, 1984 in which the Commission indicated that it has made a preliminary finding of reason to believe that the Studds Trust Fund ("the Trust") was a political committee and had failed to file registration and reporting statements as required by the Federal Election Campaign Act ("the Act").

By this letter, the Trust emphatically denies that it has violated any provisions of the Act. For the reasons set out in the response in MUR 1744 of the Committee to Re-Elect Congressman Studds and Edwin M. Martin, Jr. (dated December 10, 1984), pages 3-8, the Trust has fully complied with the conditions set out in Advisory Opinion 1983-21, and has neither raised nor spent any funds for the purpose of influencing a federal election.* Thus, the Trust is not a political committee and is not subject to the registration and reporting requirements of the Act.

This concludes our response to the Commission's reason to believe finding in MUR 1744. The Commission has no legal or factual basis for the charges against the Studds Trust. The Commission therefore should find that no violation has occurred and vote to close the file.

Should you decide that any issues remain unresolved, we request the opportunity to begin conciliation proceedings as soon as possible, and in any event before the probable cause stage of the enforcement process.

Please write or call if we can be of any further assistance.

Sincerely,

Andrew Buchsbaum

Andrew Buchsbaum
Counsel for the Studds Trust

Ms. Maura White
Office of the General Counsel
Federal Elections Commission
1325 K Street, NW
Washington, DC 20463

*We hereby incorporate by reference the Response to the Commission's reason to believe finding of the Committee to Re-Elect Congressman Studds and Mr. Edwin Martin, Jr. in MUR 1744 (December 10, 1984).

GCC#5913

Studds for Congress

Maura White
Office of the General Counsel
Federal Elections Commission
1325 K Street, NW
Washington, DC 20463

RE: MUR 1744
Response to the Commission's
"reason to believe" finding

Dear Ms. White:

This letter responds to the Commission's letter of October 23, 1984, which notified the Committee to Re-Elect Congressman Studds ("the Committee") and its treasurer, Edwin M. Martin, Jr., that the Commission has made a preliminary finding of reason to believe that the Committee violated several technical provisions of the Federal Election Campaign Act ("the Act"). Because the charges made by the Commission were quite different from the vague and unsupported allegations in the original complaint made by Congressman Studds' primary opponent, because of the exigencies of the election on November 6, 1984, and because of unavoidable prior commitments by key parties, the Commission, in a letter dated November 13, 1984, allowed the Committee until December 10 to respond to respond to its preliminary findings.

By this letter, the Committee and Mr. Martin emphatically deny that the Committee or its employees have violated the provisions of the Act as charged in the Commission's reason to believe letter of October 23 or have violated any other federal election laws. The factual and legal information presented below will demonstrate that no violations have occurred. However, should the Commission believe that any issues remain unresolved, we request that the Commission allow us to begin the conciliation process as soon as possible after receipt of this response, and in any event, before the probable cause stage of the enforcement proceedings.

DISCUSSION OF THE CHARGES

1. Credit Card Transactions

The Commission's first charge is that the Committee failed "to properly disclose two expenditures to the Rockland Trust Company...involving credit card transactions." The two transactions referred to by the Commission were payments to MasterCard of $418.00 on May 15, 1984, and $21.00 on June 15, 1984. The payments were reported in Schedule B, page 4, lines B and C of the Committee's report for April 1, 1984-June 31, 1984 as follows:

38 Rosa's Lane, Scituate, Massachusetts 02066 (617) 545-6191
Authorized by the Studds for Congress Committee

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Name	Purpose of Disbursement	Date	Amount
Rockland Trust Company	MasterCard: dinner, travel	5/15/84	$418.00
Same	MasterCard: dinner	6/15/84	$ 21.00

These reports comply with the FEC regulations setting out the reporting requirements under the Act. The regulations require the disclosure of the name of the person to whom the disbursement was made, "together with the date, amount the purpose of each expenditure." 11 CFR 104.3 (b)(4)(i). The Committee has reported precisely what was required by the regulations: Rockland Trust Company, the name of person receiving the disbursements; May 15 and June 15, 1984, the respective dates; $418.00 and $21.00, the respective amounts; and "MasterCard: dinner and travel", and "MasterCard: dinner", the respective purposes. There are no special reporting requirements concerning credit card transactions in the regulations.

The reporting regulations are buttressed by record-keeping requirements which do refer specifically to credit card transactions. Under 11 CFR 102.9 (b)(2)(ii), political committees must document credit card disbursements by monthly billing statements or by customer receipts. That regulation only requires a political committee to preserve the documentation and make it available to the Commission upon request; it does not require a committee to report each credit card transaction separately

The Committee has kept its monthly billing statements for its credit card transactions, including the transactions referred to by the Commission in its reason to believe letter of October 23, 1984, and provides them to the Commission herein as Appendix A. This documentation complies with the documentation requirements for credit card disbursements set out in 11 CFR 102.9 (b)(2)(ii).

The Commission's claim that the Committee did not properly report these credit card transactions apparently is based on a handbook the Commission made available to candidates, and not on the Commission's regulations. That handbook illustrates a method of reporting credit card disbursements which provides the same information reported by the Committee, with one addition: it provides the name of the vendor whose products or services were purchased by credit card. Although this information was not included in the Committee's report, it has been preserved by the Committee and made available to the Commission upon request pursuant to Section 102.9. The Committee's method of disclosing these credit card disbursements therefore complies with the Commission's regulations. However, because the Commission may have preferred the reporting method set out in the handbook, the Committee would be happy to report these transactions in that manner in the future if the Commission so requests.

2. The Metro Advertisement

The Commission's second charge against the Committee is that the Committee accepted an in-kind contribution from Metro, a corporation, which promoted and held a fundraiser for Congressman Studds. The Commission claims that Metro placed a $90 advertisement for the fundraiser at its own expense in its newsletter, the Metro Sunday Times. Because this advertisement

was made for the purpose of assisting the Committee's efforts to raise funds, the Commission reached a preliminary conclusion that the cost of the advertisement was an in-kind contribution to the Committee.

The Commission's conclusion is premature. Because the Committee reimbursed Metro for all expenses, including the costs of the advertisement, promptly and fully in the usual course of business for such events, no in-kind contribution occurred. Metro, a nightclub, frequently holds fundraisers for various candidates and political causes. At the end of March, Metro and the Committee agreed that Metro would hold a fundraiser for Congressman Studds' re-election campaign on April 15. The Committee would receive all the money collected at the door; Metro would receive all money spent at the bar, and would bill the Committee the standard fee for room rental, promotion and advertising. This agreement was confirmed by the bill Metro sent the Committee the week after the fundraiser, attached hereto as Appendix B.

As part of Metro's promotion of the event, it placed an advertisement in its April newsletter, the Metro Sunday Times (see Appendix C). Although the Committee had agreed to pay for advertisements as part of the promotional expenses of the fundraising event, Metro inadvertently did not identify the Committee as the sponsor of the ad. The fundraiser took place on April 15. On April 16, the Committee realized that the sponsorship identification had not been placed on the ad, and asked Metro to correct the ommission as soon as possible. Metro did so in its next newsletter in May. See Appendix D.

The Committee paid Metro promptly after the fundraiser. Metro sent the Committee a letter confirming their oral agreement and billing the Committee pursuant to that agreement sometime during the week after the April 15 event. The Committee paid Metro in full on April 24, 1984, nine days after the fundraiser took place. See Appendix E (copy of the cancelled check).

The arrangement and conduct of the fundraiser in question, as described above and as documented by the attached Appendices, fully complied with all the federal election laws. The Committee paid for all aspects of the fundraiser, including the advertisement in question, in the usual and customary business manner. The only problem, which arose when Metro inadvertently excluded the sponsorship identification from the advertisement, was quickly and satisfactorily resolved. Thus, the Committee did not receive any in-kind contribution from Metro.

3. The Human Rights Campaign Fund's Solicitation Letter

The Commission's third charge against the Committee is that the Committee accepted an in-kind contribution from the Human Rights Campaign Fund ("the Fund"). According to the Commission, the in-kind contribution arose from a letter signed by Fund president Dan Bradley and paid for by the Fund which solicited money for the Studds Trust Fund ("the Trust"). According to Victor Basile, the Fund's treasurer, the Fund spent $5090.96 initially to mail the letter, which asked donors to send money to the Trust to help defray Congressman Studds' legal fees resulting from a Congressional investigation. According to the Trust, the Trust later repaid the Fund $1768. The money raised from the letter --

indeed, all the money raised from all sources for the Trust -- was spent by the Trust on legal fees, on expenses incurred in raising additional money for the Trust, and on administrative costs. None of the money was spent on campaign related activities, or for the purpose of re-electing Congressman Studds. These facts were explained to the Commission and documented in the Committee's answer to the original complaint, attached hereto as Appendix F.

The Commission's objection to the Fund's letter is that the letter "was, in part, for the purpose of influencing a federal election," even though all the money raised from the letter went to defray noncampaign legal expenses. Money spent for the purpose of influencing a federal election is defined as a contribution under the Act. See U.S.C. 431(8)(A)(i). Apparently, the Commission's theory is that the content of the letter makes the letter itself a communication advocating the election of Congressman Studds.

The Commission's parsing of the letter's language both misrepresents the meaning of the letter and flaunts the First Amendment protection afforded controversial political speech. The letter is four pages long, single spaced. The first page described Congressman Studds' historic statement from the floor of the House of Representatives. The second page explained the reaction to the statement, and the legal fees incurred by the Congressman. Nowhere on these pages is the Congressman's re-election mentioned.

The letter made its fundraising pitch on the third page. It announced the creation of a trust fund to help defray the legal expenses, and continued:

> I would like to ask you to join in making a contribution to this Trust, the proceeds from which will be used exclusively to re-pay these legal fees.
>
> By making such a contribution, you will do far more than help alleviate this debt. You will be telling Gerry Studds that you appreciate his determination to insist that sexual preference is irrelevant to a person's performance in profesional life.

Bradley letter, page 4 (emphasis added) (attached hereto as Appendix G).

The letter then discussed how Congressman Studds' courageous statement would make his re-election campaign more "brutal" if he chose to run for office in 1984. It did not ask for funds to be used for the Congressman's re-election, and none of the funds collected were used for that purpose. It urged recipients to mail a donation to "send Gerry Studds your vote of confidence, to encourage him to run in 1984. You can send a message of friendship and support to a Congressman who deserves the very best."

The clear purpose of the letter was to raise money for the Studds Trust. It accomplished that purpose mostly by appealing to the personal feelings of those who received the letter. Undeniably, the letter asked for people to show their support for Congressman Studds, and because the Congressman is an elected official, that support might naturally encourage him to seek reelection. However, that support was a "vote of confidence" and friendship by people who respect the Congressman, regardless of their views on his

reelection. Indeed, the letter stated that Congressman Studds had not decided whether he would run for reelection. The letter raised no money for his campaign. In short, the purpose and effect of the letter were to raise money to help Congressman Studds defray noncampaign legal expenses. Such a letter is not an in-kind contribution.

Recent court decisions emphasizing the constitutional protection of political speech reinforce this conclusion. In Buckley v. Valeo 424 U.S. 1 (1976), the Court cautioned,

> Public discussion of public issues which are also campaign issues readily and often unavoidably draws in candidates and their problems, their voting records and other official conduct. Discussion of those issues, and as well as more positive efforts to influence public opinion on them, tend naturally and inexorably to exert some influence on voting at elections.

424 U.S. at 42 n.50 (emphasis added). The court refused to consider such communications as contributions, even though their incidental purpose was to influence the outcome of a federal election. 424 U.S. at 80. See also FEC v. AFSCME, 471 F. Supp. 315, 316-17 (D.D.C. 1976). More recently, the Second Circuit, sitting en banc, admonished the Commission for its overzealous enforcement of the Act against an organization that distributed candidates voting records. As Chief Judge Kaufman wrote in a strongly-worded concurring opinion,

> If speakers are not granted wide latitude to disseminate information without government interference, they will "steer far wider of the unlawful zone," Speiser v. Randall, 357 U.S. 513, 526 (1958), thereby depriving citizens of valuable opinions and information. This danger is especially acute when an official agency of government has been created to scrutinize the content of political expression, for such bureaucracies feed upon speech and almost ineluctaby come to view unrestrained expression as a potential "evil" to be tamed, muzzled or sterilized. United States v. National Committee for Impeachment, 469 F. 2d. 1135, 1142 (2nd Cir. 1972). Accordingly, it is not completely surprising that the FEC should view the content of defendants' leaflet in a substantially different light than the members of this court.
>
> The possible inevitability of this institutional tendency, however, renders this abuse of power no less disturbing to those who cherish the First Amendment and the unfettered political process it guarantees. Buckley v. Valeo, supra, imposed upon the FEC the weighty, if not impossible, obligation to exercise its powers in a manner harmonious with a system of free expression.

FEC v. Clitrim, 616 F. 2d 45, 54-55 (2nd Cir. 1980).

These constitutional principles apply with equal vigor to the Fund's letter. The letter asked for nonpolitical support on a controversial and sensitive public issue. Its sole purpose and function were to raise funds to pay for legal fees. In its fundraising appeal, it incidentally discussed Congressman Studds' re-election prospects. That presentation is the same as the

discussion referred to in Buckley that "tends to spread naturally and inexorably to exert some influence on voting at elections," and which is fully protected from regulation by the First Amendment. In short, neither the purpose nor the effect of the letter was to influence a federal election. The letter was not an in-kind contribution from the Fund to the Committee.

The letter's negligible and incidental influence in the election is highlighted by the fact that only a handful of people who received the letter resided in Congressman Studds' district and could vote in the election. Unlike other nationwide fundraising efforts, the Fund's letter had no affect on the Committee's fundraising; all the money raised by the letter was used for legal expenses, not for campaign expenses. Thus the only expenses which could have had the purpose of influencing a federal election were the expenses associated with sending the letters to persons in the Congressman's district who could vote for the Congressman and thereby affect the outcome of the election. According to Victor Basile, treasurer of the Fund, only 10 people out of the 10,000 names on the Fund's mailing list reside in Congressman Studds' district. The mailing's only possible influence on a federal election would arise from the letters mailed to those 10 people, or one-tenth of one percent of the entire mailing list. The mailing clearly did not have the purpose or effect of influencing a federal election.

A second factor which emphasizes the incidental influence that the letter had on the election is the small portion of the letter which arguably relates to Congressman Studds' re-election. Only three sentences in the four-page letter refer to Congressman Studds' re-election; the rest discuss his historic statement and his career in Congress. Thus, only a fraction of each letter -- approximately ten percent -- can be considered to have had some sort of impact on a federal election. The purpose and effect of the letter clearly are unrelated and incidental to influencing a federal election.

4. The Studds Trust

The Commission's final charge is that the Studds Trust became a political committee "as a result of its transfer of $1,768 to the Human Rights Campaign Fund" yet failed to register and file the reports required of political committees under 2 U.S.C. Sections 433 and 434. This allegation is unsupported by law or fact. The transfer in question was a partial repayment for services rendered and did not constitute a contribution or expenditure; thus, the Trust is not a political committee, subject to the Act's registration and reporting requirements.

Under the Commission's regulations, "political committee" is defined as any group of persons "which receives contributions aggregating in excess of $1000 or which makes expenditures aggregating in excess of $1000 during a calendar year." 11 CFR 100.5 (a). "Contribution" is normally defined under the Act as "any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for federal office" (emphasis added). 2 U.S.C. Section 431(8)(A)(i). "Expenditure" is defined as "any purchase, payment, distribution, loan, advance, deposit, or gift of money or anything of value, made by any person for the purpose of influencing any election for Federal office..." (emphasis added). 2 U.S.C. Section 431(9)(A)(i). Thus, organizations become

9 3 0 4 0 5 4 4 5 7 0

political committees only if they raise or spend over $1000 for the purpose of influencing a Federal election.

These definitions guided the Commission when it issued Advisory Opinion 1983-21, which concluded that a legal defense fund such as the Studds Fund would not be subject to the registration and reporting requirements of the Act:

> The Commission concludes that to the extent the proposed trust fund is used exclusively for the purpose of paying the costs of [Rep. Studds] legal defense arising from Congressional or other proceedings not involving compliance or audit matters under the Act, donations to and disbursements from the Trust would not constitute contributions or expenditures under the Act...Accordingly, neither the source nor the amount of donations to the Trust would be limited under the Act or Commission regulations. Nor would the Act or regulations require any reporting of receipts or payments of the Trust. In reaching this conclusion the Commission also assumes that none of the residual funds, upon dissolution of the Trust, will be distributed or transferred to your campaign committee or to any other political committee.

As the Trust has already documented in the Committee's answer to the original complaint, all the Trust's funds were raised and spent solely for the purpose of defraying Congressman Studds' legal expenses, and to pay for administrative and fundraising costs for the Trust. The Trust therefore has fully and consistently complied with the conditions set out in the Advisory Opinion. Nevertheless, the Commission objects to the Trust's "transfer" of money to the Fund.

It is clear under the Act and the regulations that a payment of funds is relevant to the issue of whether the payor is a political committee only in so far as the payment involves a contribution or expenditure. A payment of funds will bring an organization under the purview of the Act only if the payment is made "for the purpose of influencing a Federal election." Although AO 1983-21 warns the Trust not to distribute or transfer funds to a political committee, the prohibition against such payments only applies to contributions or expenditures by the Trust.

The Trust's reimbursement of $1,768 to the Fund was neither a contribution nor an expenditure. The Fund served as a direct mail fundraiser for the Trust. It spent $5090.96 to solicit money for the Trust. The Trust repaid $1,768 of those expenses. Although the Fund is a political committee, operating at least in part for the purpose of influencing a Federal election, the Trust's reimbursement to the Fund for services rendered must be treated as if the Fund were a vendor providing a fundraising service. Thus, the reimbursement was not a contribution to the Fund.**

The Commission's regulations acknowledge that such repayments are not contributions under the Act. According to the regulations, if a political committee makes a loan to any person, "[r]epayment of the principal amount of such loan to such political committee shall not be a contribution by the debtor to the lender committee" (emphasis added). 11 CFR 100.7(a)(1)(i)(E). This provision applies with equal force to repayments for service

rendered, such as those performed by the Fund for the benefit of the Trust.

Neither was the payment from the Trust to the Fund an expenditure under the Act. The payment reimbursed the Fund for a portion of its costs in mailing the Bradley solicitation letter. As discussed in detail above, the purpose and effect of that letter were to raise money to defray Congressman Studds' non-campaign legal expenses. Any impact or influence the letter might have had on a federal election was incidental. Such incidental impacts do not make the Trust a political committee. As the Supreme Court noted in Buckley, many political communications not covered by the Act have had the incidental purpose or effect of influencing a federal election. 424 US at 42 n.50.***

This concludes our response to the Commission's reason to believe findings in MUR 1744. Our response demonstrates that the Commission has no legal or factual basis for the charges against the Committee, Mr. Martin, or the Studds Trust. The Commission therefore should find that no violation has occurred, and vote to close the file.

However, should you decide that any questions remain unanswered, we request the opportunity to begin conciliation proceedings before you move to the probable cause phase of the enforcement process.

Please write or call if we can be of any further assistance.

Sincerely,

Andrew Buchsbaum

Andrew Buchsbaum
Counsel for the Committee to Re-Elect
Congressman Studds and Edwin M.
Martin, Jr.

2 5 0 4 0 5 4 4 5 7

FOOTNOTES

*Mr. Basile calculated the number of people who received the letter and reside in the Congressman's district by comparing the zip codes of the district with the zip codes of the names on the Fund's mailing list. Only 10 people on the mailing list had addresses with zip codes that corresponded to the zip codes in Congressman Studds' district.

**This situation therefore is different from the one considered by the Commission in Advisory Opinon 1981-1. There, the Commission concluded that an organization's disbursement of excess campaign funds to a political committee would be a contribution. In that case, however, the disbursement was a donation, not a payment made in return for any services or products. Here, the Trust's disbursement was part of a business arrangement to reimburse the Fund for the costs of sending a solicitation letter for the Trust.

Our situation is closer to the one considered by the Commission in AO 1980-38, where the Commission concluded that payments from a state organization to a political committee for the use of a computer would not constitute contributions from the state organization.

***Regardless of the Commission's conclusions about whether the payment was an expenditure, far less than $1000 of the payment arguably could have had the purpose of influencing a federal election. As discussed above, fewer than one-tenth of one percent of the letters were mailed to persons in Congressman Studds' district. Only ten percent of each letter could have had an incidental influence on the outcome of the election. Thus, only a tiny fraction of the $1,768 -- far less than the $1000 amount that triggers registration and reporting requirements under the Act -- could have been spent by the Trust arguably for the purpose of influencing a federal election.

8 5 0 3 0 5 1 4 5 7 3

APPENDIX A

8504054574

CUSTOMER INFORMATION

617-878-6188 0247

Cit. # 2442

5287 7454 0356 4286	2500	1785	29	04/25/84	05/20/84	13.00

0323	0330	7520700FAUBAT947D	PRONTO PROVINCETOWN MA	38.45
0405	0405	M7520700FHX2CLDUC5	PAYMENT - THANK YOU	294.81-
0326	0409	7530070FG2G57GH60	NAPIS RESTAURANT PROVINCETOWN MA	10.40
0314	0410	7515000FLAG0MNAZM	TWA 288 01558737491409 WASHINGTON DC FR 5	359.50
0324	0410	7530070FA2TE06JJ6	NAPIS RESTAURANT PROVINCETOWN MA	10.45

294.81	294.81	0.00	0.00	418.80	0.00	0.00	418.80

[redacted] A CREDIT OR A CREDIT BALANCE UNLESS OTHERWISE INDICATED.

SEND NOTICE OF BILLING ERRORS TO: ROCKLAND TRUST COMPANY 288 UNION ST. ROCKLAND MA 02370

ALL	1.500% %	18.00% %	0.00	0.00

MasterCard

AY

IF NO CASH ADVANCES ARE OUTSTANDING ON THE DATE YOUR PAYMENT IS CREDITED, YOUR PAYMENT OF NEW BALANCE BY PAYMENT DUE DATE WILL AVOID ADDITIONAL FINANCE CHARGE ON THE NEW BALANCE. 6

NOTICE: See reverse side for important information.

8504054575

CUSTOMER INFORMATION
(See reverse side for billing rights summary)

617-878-6100 0247

CK # [redacted] 2512

5287 1434 0356 4286	2500	1786	30	05/25/84	06/19/84	21.00

0430	0430	7520700G9UBC8WNM8	PBA,INC NAPLES FL	296.00
0506	0508	7525400GG00WKP1TD	PACIFIC SOUTHWEST AIRL BURBANK CA	164.00
0506	0508	7525400GG00WKP1T5	PACIFIC SOUTHWEST AIRL BURBANK CA	164.00
0507	0509	7525400GH00WKHTXL	PACIFIC SOUTHWEST AIRL SAN FRANCISCO CA	164.00
0507	0509	7525400GH00WKHTXV	PACIFIC SOUTHWEST AIRL SAN FRANCISCO CA	[illegible].00
0430	0509	7520700GJUBCRYPFC	PRONTO PROVINCETOWN MA	25.25
0506	0511	7541037GK0B364UX6	GROSVENOR AIRPORT INN S SAN FRAN CA	14.00
0504	0514	7520400GL4MFK7JHX	CHEVRON INGLEWOOD CA	10.00
0506	0514	7541037GL0BPVWRGE	YET WAH RESTAURANT SAN FRANCISCO CA	22.65
0507	0515	7520400GP4MFN6VH0	CHEVRON LOS ANGELES CA	10.00
0507	0515	7825400GK00R3JWHK	JERRYS FAMOUS DELI INC STUDIO CITY CA	17.03
0515	0515	7520700GTX2CLDUBZ	PAYMENT - THANK YOU	418.80-
0513	0521	7520700GYU7N2HKC8	ALEWIFE TAVERN INC NORWELL MA	54.75
0514	0522	7530070GV2H3DJV02	COTTAGE RESTAURANT PROVINCETOWN MA	8.25

418.80	418.80	0.00	0.00	713.93	0.00	0.00	713.93

AN AMOUNT FOLLOWED BY A MINUS SIGN (-) IS A CREDIT OR A CREDIT BALANCE UNLESS OTHERWISE INDICATED.

SEND NOTICE OF BILLING ERRORS TO: ROCKLAND TRUST COMPANY 288 UNION ST. ROCKLAND MA 02370

RANGE OF BALANCES TO WHICH RATES APPLY	MONTHLY PERIODIC RATE	ANNUAL PERCENTAGE RATE	BALANCE ON WHICH FINANCE CHARGE WAS COMPUTED		CASH ADVANCES OUTSTANDING
ALL	1.500% %	18.00% %	0.00		0.00

MasterCard

AY

IF NO CASH ADVANCES ARE OUTSTANDING ON THE DATE YOUR PAYMENT IS CREDITED, YOUR PAYMENT OF NEW BALANCE BY PAYMENT DUE DATE WILL AVOID ADDITIONAL FINANCE CHARGE ON THE NEW BALANCE.

NOTICE: See reverse side for important information.

8504054576

APPENDIX B

8504054577

METRO

Spit

METRO VIDEO

VIDEO LOUNGE

Congressmen Gerry Studds
c/o Gerry Studds for Congress Committee
U.S. House of Representatives
Washington, DC

Dear Sirs:

Enclosed please find a breakdown of the billing and proceeds for 15 April 1984:

Total Door Proceeds on 15 April 1984 (1,486 @ $3)	$ 4459.00
Room Rental	$ 1800.00
Promotion	$ 249.50
Advertisements	
Metro Sunday Times (½ page)	$ 90.00
Bay Window	$ 90.00
AMOUNT DUE	$ 2229.50

Thank you very much for your cooperation in this matter.

Sincerely,

Kyle MacLaughlin
Corporate Controller

THAT'S ENTERTAINMENT, INC!

15 LANSDOWNE STREET BOSTON, MASSACHUSETTS 02215 617 262-2424

APPENDIX C

8504054579

April

Club Café

209 Columbus Ave.

The newest and hottest alternative to Boston's restaurant and bar scene.

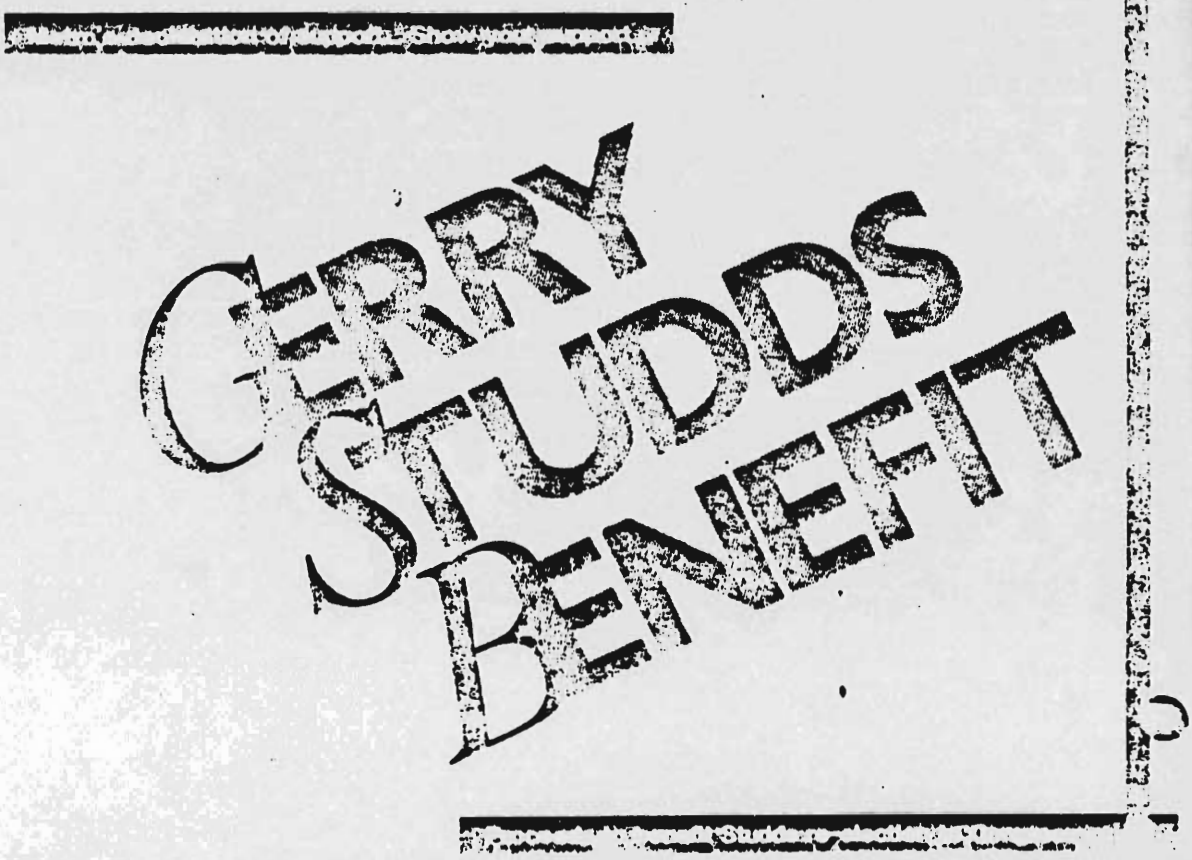
Now featuring a full liquor bar with live entertainment Thursday, Friday & Saturday 9pm – midnight and Sunday brunch noon – up.

Happy hour 7days a week 3pm – 7pm
House drinks $1.75
Miller & Lite $1.00

Reservations suggested 536-0966

8504054530

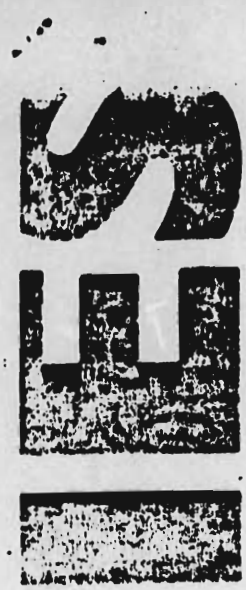




APPENDIX D

8504054581

may





Metro Sunday Times
7 Lansdowne St. Boston
262-2424

Boston/Worcester

Publisher
George Tamsitt

Art Director
Mike Hoffman

Designer
Kevin McIntire

Sun., May 20 - [illegible] NIGHT
Sun., May 31 - 2 FOR 1 KICKOFF
Sun., June 17 - "A Night in White"
GAY PRIDE CELEBRATION

Spit

Thurs., May 3 - BILL NELSON
Wed., May 9 - NOVEMBER GROUP
Thurs., May 10 - [illegible]

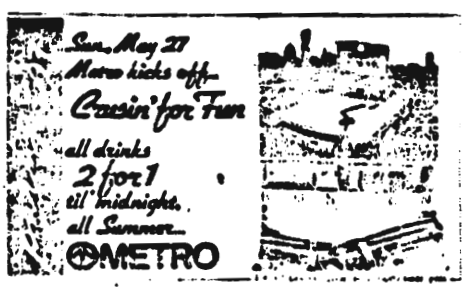
Thurs., May 17 - SKIN
Thurs., May 25 - BODS & CONES
Fri., May 25 - CARMEN MIRANDA NIGHT
Thurs., May 31 - VIOLENT FEMMES

Unfortunately, George Tamsitt was unable to make his deadline this month (due to the KISS-108 party). He'll be back next month. He did want to say --

We regret the fact that we omitted the line "Paid for by Studds for Congress Committee" in our April Edition. (April 15 fundraiser)

The Sunday Club of METRO
Name Wm E Hudson
Address 111 Sunset Blvd
Hollywood Zip
Comments "Blanche
"you'll never get
OUT OF HERE"
Card holder Yes/No





APPENDIX E

8504045883

THE COMMITTEE TO RE-ELECT
CONGRESSMAN STUDDS

2402

April 24 19 74 53-447 113

PAY TO THE ORDER OF Entertainment, Inc $ 2,229.50

Two thousand, two hundred and twenty-nine 50/100 DOLLARS

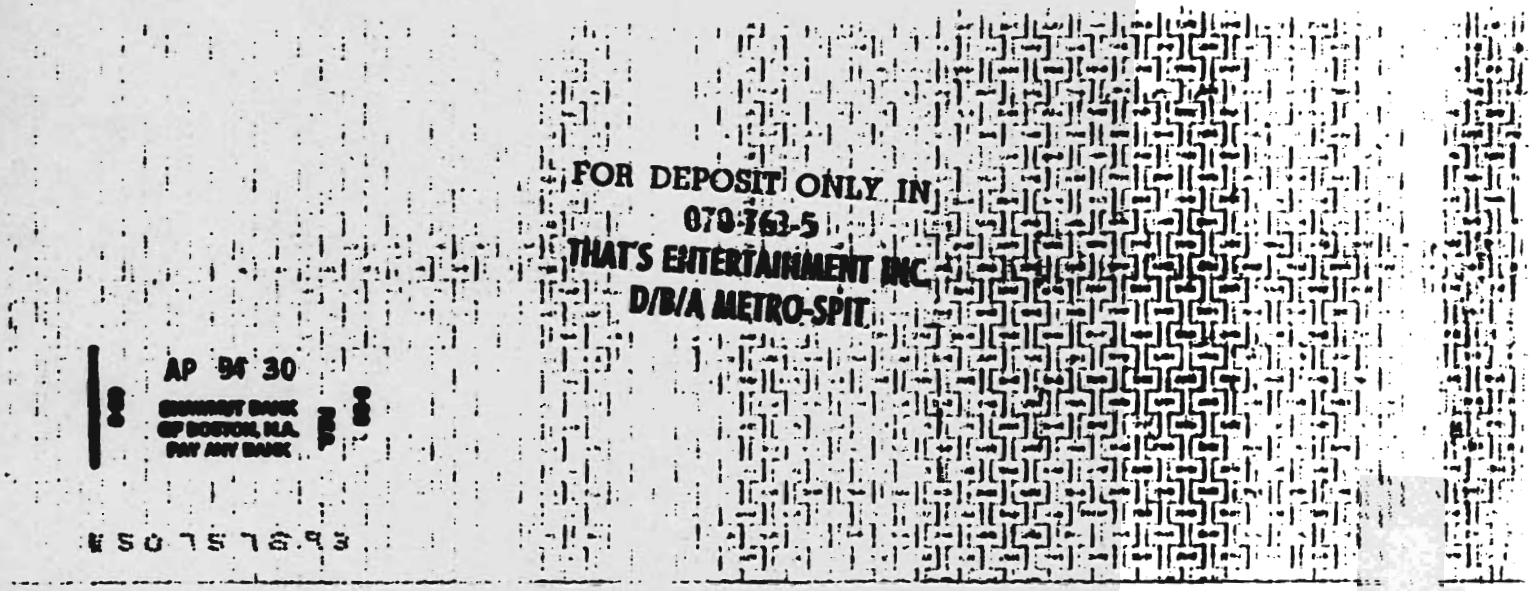
Rockland Trust Company
Plymouth, Massachusetts 02370

FOR use of facilities, promotional activities

Mary Lou Burden

⑆011304478⑆ 3-022-811 "0000222950"

8504054581



8502405445837

8504054586

APPENDIX F

STUDDS' TRUST FINANCIAL SUMMARY

CONTRIBUTIONS

Generated by Bradley Letter	23,129.13
Other	19,870.00
Total contributions	42,999.13*
Interest	311.19
	43,310.32

(see bank statements attached)

EXPENDITURES

Legal fees	40,309.51
Reimbursement to Human Rights Campaign Fund	1,768.00
Other operating expenses	1,156.92
Total expenses	43,234.44

(see bank statements and copies of cancelled checks attached)

BALANCE IN ACCOUNT

75.88

*This figure includes one $20.00 deposit made on 7/26/84 for which the bank statement has not been received.

8504045837

Shawmut Banks

STATEMENT OF ACCOUNT

SHAWMUT FIRST COUNTY BANK, N.A.
BRANCH 006
PO BOX 972
BROCKTON MA 02403

(617) 586-5500

413-059-6

TAXPAYER ID NUMBER
04-6495262

STATEMENT PERIOD
06/15/84 THRU 07/17/84

1 ENCLOSED ITEM

PREPARED FOR
STUDDS TRUST
38 ROSA'S LANE
SCITUATE MA 02066

SHAWMUT OFFERS A VARIETY OF SAVINGS AND INVESTMENT PLANS DESIGNED TO SUIT YOUR GO AND NEEDS. FOR MORE INFORMATION CALL 1-800-SHAWMUT OR ASK YOUR PERSONAL BANKER

ACCOUNT SUMMARY

200

TYPE OF ACCOUNT	BEGINNING BALANCE	CHECKS/ DEBITS	DEPOSITS/ CREDITS	ENDIN BALANC
MONEY MARKET DEP	360.36	305.00	.52	55.8

ACCOUNT ACTIVITY

MONEY MARKET DEPOSIT ACCOUNT 10-413-059-6

DAILY BALANCE

DATE	ENDIN BALANC
06/18	55.6
06/25	55.7
07/02	55.7
07/09	55.8
07/16	55.8

******CHECKS******

NUMBER	DATE	AMOUNT	NUMBER	DATE	AMOUNT
113	06/18	305.00			

1 CHECK TOTALING 305.00

******OTHER DEBITS******

NONE

******DEPOSITS/CREDITS******

	DATE	AMOUNT
INTEREST PAID	06/18	.28
INTEREST PAID	06/25	.06
INTEREST PAID	07/02	.06
INTEREST PAID	07/09	.06
INTEREST PAID	07/16	.06

5 DEPOSITS/CREDITS TOTALING .52

INTEREST PAID YEAR TO DATE 84.89

THE INTEREST PAID TO YOUR ACCOUNT WILL BE 5.0000% WHENEVER BALANCE FALLS BELOW $2,500.00

Shawmut Banks

STATEMENT OF ACCOUNT

DIRECT INQUIRIES TO
SHAWMUT FIRST COUNTY BANK, N.A.
BRANCH 006
PO BOX 972
BROCKTON MA 02403

(617) 586-5500

ACCOUNT NUMBER
413-059-6

TAXPAYER ID NUMBER
04-6495262

STATEMENT PERIOD
05/15/84 THRU 06/15/84

PREPARED FOR
STUDDS TRUST
38 ROSA'S LANE
SCITUATE MA 02066

1 ENCLOSED ITEM

**********HERE IS YOUR NEW STATEMENT!**********
NOW YOUR PAID CHECKS ARE LISTED IN NUMERICAL ORDER TO MAKE BALANCING YOUR CHECKBOOK FASTER AND EASIER THAN EVER.

ACCOUNT SUMMARY

200471

TYPE OF ACCOUNT	BEGINNING BALANCE	CHECKS/ DEBITS	DEPOSITS/ CREDITS	ENDING BALANCE
MONEY MARKET DEP	517.53	463.00	305.83	360.36

MONEY MARKET DEPOSIT ACCOUNT 10-413-059-6

**********CHECKS**********

NUMBER	DATE	AMOUNT
118	05/24	463.00

1 CHECK TOTALING 463.00 ✓

**********OTHER DEBITS**********

NONE

**********DEPOSITS/CREDITS**********

	DATE	AMOUNT
INTEREST PAID	05/21	.52
INTEREST PAID	05/25	.19
INTEREST PAID	06/04	.06
INTEREST PAID	06/11	.06
DEPOSIT	06/12	305.00 ✓

5 DEPOSITS/CREDITS TOTALING 305.83

DAILY BALANCE

DATE	ENDING BALANCE
05/21	518.05
05/24	55.05
05/25	55.24
06/04	55.30
06/11	55.36
06/12	360.36

INTEREST PAID YEAR TO DATE 84.37

THE INTEREST PAID TO YOUR ACCOUNT WILL BE [illegible] WHENEVER BALANCE FALLS BELOW $2,500.00

Shawmut
First County Bank, N.A.
[illegible] Main St., Brockton, MA 02403

STATEMENT OF ACCOUNT

[illegible]
3-[illegible]-[illegible]

STODDS TRUST
38 ROSA'S LANE
SCITUATE MA 02066

STATEMENT DATE
05/25/04
CYCLE DAYS

[illegible]
05/0[illegible]

[illegible] BALANCES	SUPERCHECK	SAVINGS	NOW AND SAVINGS INTEREST SUMMARY: PAID TO DATE THIS YEAR	TAXPAYER ID NUMBER
[illegible]			[illegible]	[illegible]

SCHEDULE SUMMARY [illegible]	DAILY PERIODIC RATE	FINANCE CHARGE	ANNUAL PERCENTAGE RATE	AVERAGE [illegible]	PAYMENT AMOUNT AND DATE DUE
[illegible]					

CHECKS PAID OR DEBITS	DEPOSITS OR PAYMENTS	DATE	BALANCE
NEW [illegible] DEPOSIT ACCT [illegible]-[illegible]-[illegible]-0 PREVIOUS BALANCE			1.00
	24.03	05/04	24.03
	.18IN	05/07	24.21
E ANNUAL INTEREST RATE IS 05.[illegible] AS OF 05/07/04			
	493.00	05/13	517.21
. ANNUAL INTEREST RATE IS 05.[illegible] AS OF 05/14/04	.32IN	05/14	517.53

WEEKLY RATE CHANGE
THE ANNUAL INTEREST RATE IS [illegible] WHILE YOUR BALANCE REMAINS
BELOW $ 2,500.00

8504054590

[illegible] AND ACCOMPANYING STATEMENT [illegible] IMPORTANT [illegible]
[illegible] FOR ADDITIONAL DETAILS AR[illegible]

Shawmut
First County Bank, N.A.
90 Main St., Brockton, MA 02403

STATEMENT OF ACCOUNT

STUDDS TRUST
33 ROSA'S LANE
SCITUATE MA 02066

05/02/04

04/17

SUMMARY OF NEW BALANCES			NOW AND SAVINGS INTEREST SUMMARY	
.00			PAID TO DATE THIS YEAR: 03.04	TAXPAYER ID NUMBER: 04-6495262

CHECKS SUMMARY					
BEGINNING BALANCE	DAILY PERIODIC RATE	FINANCE CHARGE	ANNUAL PERCENTAGE RATE	AVERAGE CREDIT	PAYMENT AMOUNT AND DATE DUE

CHECKS PAID OR DEBITS	DEPOSITS AND OTHER PAYMENTS	BALANCE	BALANCES
MONEY MARKET DEPOSIT ACCT 11-413-055-6	PREVIOUS BALANCE	04/21	550.42
	.55IN	04/21	550.97
THE ANNUAL INTEREST RATE IS 03.3500%	AS OF 04/23/04		
	440.00	04/23	990.97
	70.00	04/30	1,060.97
	.86IN	04/30	1,061.83
THE ANNUAL INTEREST RATE IS 03.3500%	AS OF 04/30/04		
7.80		05/01	1,054.03
1,054.03		05/02	.00

WEEKLY RATE CHANGE
THE ANNUAL INTEREST RATE IS 3.25% WHILE YOUR BALANCE REMAINS BELOW $ 2,500.00

8504054591

NOTE: [illegible] AND ACCOUNTING NOTICES FOR ADDITIONAL [illegible]

Shawmut
First County Bank, N.A.
10 Main St., Brockton, MA 02403

STATEMENT OF ACCOUNT

13-059-6
4

STUDDS TRUST
38 ROSA'S LANE
SCITUATE MA 02066

STATEMENT DATE
04/17/84

LAST STATEMENT
03/15

SUMMARY OF NEW BALANCES			NOW AND SAVINGS INTEREST SUMMARY	
CHECKING/MAIN	SUPERCHECK	SAVINGS	PAID TO DATE THIS YEAR	TAXPAYER ID NUMBER
550.42			81.63	04-6085262

SUPERCHECK SUMMARY				
AVERAGE AVAILABLE	ANY PERIODIC RATE	FINANCE CHARGE	ANNUAL PERCENTAGE RATE	AVERAGE CREDIT

CHECKS PAID OR DEBITS	DEPOSITS OR CREDITS	POST DATE	BALANCE
ONEY MARKET DEPOSIT ACCT 10-413-059-6	PREVIOUS BALANCE		1,270.93
	1.28IN	03/19	1,272.21
IE ANNUAL INTEREST RATE IS 05.2500% AS OF 03/19/84			
	1.28IN	03/26	1,273.49
IE ANNUAL INTEREST RATE IS 05.2500% AS OF 03/26/84			
	2,487.00	04/02	3,760.49
	1.40IN	04/02	3,761.89
IE ANNUAL INTEREST RATE IS 08.6000% AS OF 04/02/84			
IE ANNUAL INTEREST RATE IS 09.0000% AS OF 04/03/84			
76.60		04/09	3,685.29
	6.47IN	04/09	3,691.76
IE ANNUAL INTEREST RATE IS 09.0000% AS OF 04/09/84			
14.31		04/11	3,677.45
130.00		04/11	3,547.45
3,000.00		04/13	547.45
	2.97IN	04/13	550.42
IE ANNUAL INTEREST RATE IS 05.2500% AS OF 04/13/84			

WEEKLY RATE CHANGE
THE ANNUAL INTEREST RATE IS 5.25% WHILE YOUR BALANCE REMAINS BELOW $ 2,500.00

NOTICE: IMPORTANT SEE ANDACCOMPANYING STATEMENT FOR IMPORTANT INFORMATION
ADDITIONAL NOTICES FOR ADDITIONAL DETAILS ARE AVAILABLE AT ANY OFFICE

Shawmut
First County Bank, N.A.
20 Main St., Brockton, MA 02403

STATEMENT OF ACCOUNT

[illegible] 13-059-5	STUDDS TRUST 39 RUSA'S LANE SCITUATE MA 02066	STATEMENT DATE 03/15/84	DATE OF LAST STATEMENT 02/15

PREVIOUS BALANCE	SUPERCHECK	SAVINGS	PAID TO DATE THIS YEAR	TAXPAYER ID NUMBER
1,270.23			08.23	[illegible]

AVERAGE DAILY BALANCE	DAILY PERIODIC RATE	FINANCE CHARGE	ANNUAL PERCENTAGE RATE	AVAILABLE CREDIT	PAYMENT AMOUNT AND DATE DUE

	CHECKS PAID OR DEBITS	DEPOSITS AND OTHER CREDITS		BALANCE
	MONEY MARKET DEPOSIT ACCT 10-413-059-0	PREVIOUS	BALANCE	7,311.75
		11.27IN	02/17	7,323.02
1E	ANNUAL INTEREST RATE IS 08.00% AS OF 02/17/84			
		6,813.00	02/21	14,136.02
		20.33IN	02/27	14,156.35
1E	ANNUAL INTEREST RATE IS 08.00% AS OF 02/27/84			
		1,222.99	03/05	15,379.24
		21.85IN	03/05	15,401.09
1E	ANNUAL INTEREST RATE IS 08.00% AS OF 03/05/84			
		5,171.50	03/06	20,572.59
1E	ANNUAL INTEREST RATE IS 08.00% AS OF 03/06/84			
	12,300.52		03/07	8,272.07
	7,000.00		03/09	1,272.07
1E	ANNUAL INTEREST RATE IS 05.25% AS OF 03/09/84			
		7.86IN	03/12	1,279.93
1E	ANNUAL INTEREST RATE IS 05.25% AS OF 03/12/84			
	WEEKLY RATE CHANGE			
	THE ANNUAL INTEREST RATE IS 5.25% WHILE YOUR BALANCE REMAINS			
	BELOW $ 2,500.00			

NOTICE: SEE REVERSE SIDE AND ACCOMPANYING STATEMENT [illegible]
[illegible] WINDOW NOTICES FOR ADDITIONAL DETAILS [illegible]

Shawmut
First County Bank, N.A.
[illegible] Main St Brockton, MA 02403

STATEMENT OF ACCOUNT

3-059-6

STUDDS TRUST
38 ROSA'S LANE
SCITUATE MA 02066

STATEMENT DATE 02/15/84

PAGE NO. 01/17

SUMMARY OF NOW BALANCES	SUPERCHECK	SAVINGS	PAID TO DATE THIS YEAR	TAXPAYER ID NUMBER
7,311.73			6.90	04-6495262

SUPERCHECK SUMMARY					
AVERAGE DAILY BALANCE	DAILY PERIODIC RATE	FINANCE CHARGE	ANNUAL PERCENTAGE RATE	AVAILABLE CREDIT	PAYMENT AMOUNT AND DATE DUE

CHECKS PAID OR DEBITS	DEPOSITS OR PAYMENTS	INSTR. CODE	DATE	BALANCES
QUID INVESTMENT ACCOUNT 10-413-059-6		PREVIOUS	BALANCE	1,110.35
	1.12	IN	01/23	1,111.47
E ANNUAL INTEREST RATE IS 05.2500% AS OF 01/23/84				
	40.00		01/30	1,151.47
	1.12	IN	01/30	1,152.59
E ANNUAL INTEREST RATE IS 05.2500% AS OF 01/30/84				
	1.16	IN	02/06	1,153.75
E ANNUAL INTEREST RATE IS 05.2500% AS OF 02/06/84				
	6,156.74		02/13	7,310.49
	1.24	IN	02/13	7,311.73
E ANNUAL INTEREST RATE IS 08.0000% AS OF 02/13/84				
E ANNUAL INTEREST RATE IS 08.0500% AS OF 02/14/84				
WEEKLY RATE CHANGE				
THE ANNUAL INTEREST RATE IS 5.25% WHILE YOUR BALANCE REMAINS				
BELOW $ 2,500.00				

8504054594

ICE [illegible] SIDE AND ACCOMPANYING STATEMENT [illegible]
[illegible] ADDITIONAL DETAILS [illegible]

Shawmut
First County Bank, N.A.

STATEMENT OF ACCOUNT

STUDY TRUST

FINANCE CHARGE ANNUAL PERCENTAGE RATE

8504054595

Shawmut
First County Bank, N.A.

STATEMENT OF ACCOUNT

Shawmut
First County Bank, N.A.
Main St. Brockton MA 02403

STATEMENT OF ACCOUNT

3-059-6

STUDDS TRUST
38 RUSA'S LANE
SCITUATE MA 02066

11/16/83

3

10/13

BALANCE			PAGE
9,093.51		148.57	040-49-5202

SUMMARY

	DATE	FINANCE CHARGE	ANNUAL PERCENTAGE RATE

GOLD INVESTMENT ACCOUNT 10-413-059-6		PREVIOUS BALANCE		8,724.49
		25.00	10/20	8,749.49
		13.98IN	10/24	8,763.47
ANNUAL INTEREST RATE IS 06.1000% AS OF 10/24/83				
ANNUAL INTEREST RATE IS 08.0000% AS OF 10/25/83				
3.32			10/26	8,760.24
		120.00	10/28	8,880.24
		200.00	10/31	9,080.24
		13.48IN	10/31	9,093.72
ANNUAL INTEREST RATE IS 08.0000% AS OF 10/31/83				
		20.00	11/02	9,113.72
		150.00	11/04	9,263.72
		14.01IN	11/07	9,277.73
ANNUAL INTEREST RATE IS 08.0000% AS OF 11/07/83				
		100.00	11/08	9,377.73
107.40			11/08	9,270.33
ANNUAL INTEREST RATE IS 07.9000% AS OF 11/08/83				
190.59			11/09	9,079.74
		13.77IN	11/14	9,093.51
ANNUAL INTEREST RATE IS 07.9000% AS OF 11/14/83				

WEEKLY RATE CHANGE
THE ANNUAL INTEREST RATE IS 5.256 WHILE YOUR BALANCE REMAINS BELOW $ 2,500.00

3 5 0 4 0 5 1 4 5 9 7

ICE

Shawmut
First County Bank, N.A.
[illegible] Main St., Brockton, MA 02403

STATEMENT OF ACCOUNT

[illegible]-13-[illegible]-6
-3

STUDDS TRUST
38 ROSA'S LANE
SCITUATE MA 02066

10/28/03

[illegible]

SUMMARY OF NEW BALANCES				
[illegible]	SUPERCHECK	[illegible]	[illegible]	[illegible]
3,724.95			9.73	045-49-5.02

SUPERCHECK SUMMARY			
[illegible]	MIN BALANCE	FINANCE CHARGE	ANNUAL PERCENTAGE RATE
[illegible]	[illegible]	[illegible]	[illegible]

CHECKS PAID OR DEBITS		DEPOSITS	DATE	BALANCE
1000	INVESTMENT ACCOUNT 10-413-053-5		PREVIOUS	14,520.00
		220.00 C	09/19	14,740.00
		17.53IN	09/19	14,757.53
E	ANNUAL INTEREST RATE IS 00.1000% AS OF 09/19/03			
		100.00	09/22	14,857.53
		220.00 C	09/22	15,077.53
		105.00 C	09/23	15,282.53
		275.00 C	09/26	15,557.53
		25.39IN	09/26	15,582.92
1E	ANNUAL INTEREST RATE IS 00.1000% AS OF 09/26/03			
1E	ANNUAL INTEREST RATE IS 00.1000% AS OF 09/27/03			
		100.00 C	09/25	15,782.92
		165.00 C	09/29	15,947.92
		17[illegible].00 C	09/30	16,0[illegible].92
		[illegible].10IN	10/03	16,[illegible].04
1E	ANNUAL INTEREST RATE IS 00.1000% AS OF 10/03/03			
		17[illegible].00 C	10/04	16,301.04
E	ANNUAL INTEREST RATE IS 00.1000% AS OF 10/04/03			
		[illegible].00 C	10/05	16,[illegible].04
	1,[illegible].00 C		10/06	6,[illegible].04
		[illegible].00 C	10/07	6,[illegible].04
		1,090.00 C	10/07	3,[illegible].04
		14.51IN	10/07	3,[illegible].55
E	ANNUAL INTEREST RATE IS 00.1000% AS OF 10/07/03			
	[illegible].43 C		10/11	3,[illegible].12
1E	ANNUAL INTEREST RATE IS 00.1000% AS OF 10/11/03			
		260.00 C	10/16	3,577.12
		300.00 C	10/17	3,877.12
	165.38 C		10/17	3,711.80
		13.13IN	10/17	3,724.93
E	ANNUAL INTEREST RATE IS 00.1000% AS OF 10/17/03			

WEEKLY RATE CHANGE
THE ANNUAL INTEREST RATE IS 0.[illegible]% WHILE YOUR BALANCE [illegible] RATE
BELOW $ 2,500.00

[illegible]

Shawmut
First County Bank, N.A.
[illegible] Main St., Brockton, MA 02403

STATEMENT OF ACCOUNT

[illegible]

STUDIO TRUST
[illegible] ROLA'S LANE
SCITUATE MA 02066

[illegible]/14/93

14,520.00			.00

DAILY PERIODIC RATE	FINANCE CHARGE	ANNUAL PERCENTAGE RATE	AVERAGE DAILY BALANCE

CHECKS AND OTHER DEBITS	DEPOSITS	DATE	BALANCE
UNIT INVESTMENT ACCOUNT 10-413-059-6	PREVIOUS BALANCE		.00
	1,960.00	09/14	1,960.00
	12,560.00	09/14	14,520.00
THE ANNUAL INTEREST RATE IS [illegible].00006 AS OF 09/14/93			
WEEKLY RATE CHANGE THE ANNUAL INTEREST RATE IS [illegible].56 WHILE YOUR BALANCE REMAINS OVER $ 2,500.00			

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NOTICE [illegible]
[illegible] FOR ALL [illegible]

Internal Revenue Service

Date of This Notice

10-13-83

0B242683

If you inquire about your account, please refer to this number or attach a copy of this notice

Employer Identification Number

04-6495262

GERRY E STUDDS LEGAL SERVICES TRUST
STUDDS TRUST
MARY LOU BUTLER TR
38 ROSAS LA
SCITUATE MA 02066

575 B 555555155
55555555

NOTICE OF NEW EMPLOYER IDENTIFICATION NUMBER ASSIGNED

Thank you for your application for an employer identification number. The number above has been assigned to you. We will use it to identify your business tax returns and any other related documents, even if you have no employees.

Please keep this number in your permanent records. Use the number and your name, exactly as shown above, on all Federal tax forms that require this information, and refer to the number in all tax payments and in tax-related correspondence or documents. You may wish to make a record of the number for reference in case this notice is lost or destroyed.

Note that the assignment of this number does not grant tax-exempt status to nonprofit organizations. For details on how to apply for this exemption, see IRS Publication 557, Tax-Exempt Status for Your Organization, available at most IRS offices.

We appreciate your cooperation.

8504046000

GOVERNMENT PRINTING OFFICE: 1981-378-792 FT MO M-275542

CASHIER'S CHECK

Shawmut
First County Bank N.A.

CUSTOMER COPY

010491

5-2-1984

PAY TO THE ORDER OF Human Rights Campaign Fund********** 1,000.00

NON-NEGOTIABLE

AUTHORIZED SIGNATURE

0 4 0 5 4 4 6 0

STUDD'S TRUST 118

May 10 84 53-150/113

The Human Rights Campaign Fund Inc

One thousand and thirty six 00/100

Shawmut
First County Bank, N.A.
Brockton, Massachusetts 02403

LIQUID INVESTMENT ACCOUNT

Mary Ann Studd

:011301507: "104 13059 6" 0118 "0000046300"

STUDD'S TRUST 119

June 10 84 53-150/113

The Human Rights Campaign Fund Inc 305.00

Three Hundred and five 00/100

Shawmut
First County Bank, N.A.
Brockton, Massachusetts 02403

LIQUID INVESTMENT ACCOUNT

Mary Ann Studd

:011301507: "104 13059 6" 0119 "0000030500"

STUDD'S TRUST

114

53-150 113

Seventy-six and [redacted] 76.60 sixty

Shawmut
First County Bank, N.A.
Brockton, Massachusetts 02403

INVESTMENT ACCOUNT

Thank you cards

Mary Ann Studd

:011301507: 11 604 63059 6 11 0114 "0000007660"

8504014600

504

STUDD'S TRUST NO 102

Sept 29 19 83 53-150/113

PAY TO THE ORDER OF Mahoney, Hawkes & Goldings $10,000.00

Ten Thousand DOLLARS 00/100 CENTS

Shawmut First County Bank, N.A. Brockton, Massachusetts 02403

LIQUID INVESTMENT ACCOUNT

MEMO legal fees Mary Lou Butler

:011301507: 104130599 6 0102 000010000000

STUDD'S TRUST NO 103

Sept 29 19 83 53-150/113

PAY TO THE ORDER OF Henry C. Studds $765.30

One Hundred sixty-five DOLLARS 30/100 CENTS

Shawmut First County Bank, N.A. Brockton, Massachusetts 02403

LIQUID INVESTMENT ACCOUNT

MEMO print up - photo, food Mary Lou Butler

:011301507: 104130599 6 0103 000000076530

STUDD'S TRUST NO 104

Oct. 6 19 83 53-150/113

PAY TO THE ORDER OF Robert A. Pickman $238.45

Two Hundred thirty eight DOLLARS 45/100 CENTS

Shawmut First County Bank, N.A. Brockton, Massachusetts 02403

LIQUID INVESTMENT ACCOUNT

MEMO r. e. office sup, phone, postage Mary Lou Butler

:011301507: 104130599 6 0104 000000023845

STUDD'S TRUST

NO. 105

Jan. 3 19 83

53-150/113

PAY TO THE ORDER OF Robert Nickerson $ 167.40

One Hundred and sixty-seven DOLLARS 40/100 CENTS

Shawmut
First County Bank, N.A.
Brockton, Massachusetts 02403

LIQUID INVESTMENT ACCOUNT

MEMO

Tracy Lee Butler

:011301507: "104130596" 0105 "000016740"

STUDD'S TRUST

NO. 106

Jan. 3 83

53-150/113

PAY TO THE ORDER OF Scott Lejeune Inc. $ 130.59

One Hundred and thirty DOLLARS 59/100 CENTS

Shawmut
First County Bank, N.A.
Brockton, Massachusetts 02403

LIQUID INVESTMENT ACCOUNT

MEMO

Tracy Lee Butler

:011301507: "104130596" 0106 "00001305 9"

STUDD'S TRUST NO 107

12-21-83 Dec 22 1983 53-150/113

PAY TO THE ORDER OF Mary Low Butler $ 196.35

One Hundred and ninety six 35/100 DOLLARS CENTS

Shawmut First County Bank, N.A. Brockton, Massachusetts 02403

LIQUID INVESTMENT ACCOUNT

MEMO

Mary Low Butler

:011301507: "104113059 6" 0107 "0000019635"

STUDD'S TRUST NO 108

12-23-83 Dec 12 1983 53-150/113

PAY TO THE ORDER OF Mahoney, Hawkes & Goldings $ 8,000.00

Eight Thousand DOLLARS 00/100 CENTS

Shawmut First County Bank, N.A. Brockton, Massachusetts 02403

LIQUID INVESTMENT ACCOUNT

MEMO legal fee

Mary Low Butler

:011301507: "104113059 6" 0108 "0000800000"

STUDD'S TRUST NO 110

03-07-84 Feb 29 1984 53-150/113

PAY TO THE ORDER OF Mahoney, Hawkes & Goldings $ 12,309.52

Twelve Thousand, three hundred & nine DOLLARS 52/100 CENTS

Shawmut First County Bank, N.A. Brockton, Massachusetts 02403

LIQUID INVESTMENT ACCOUNT

MEMO

Mary Low Butler

:011301507: "104113059 6" 0110 "0001230952"

STUDD'S TRUST

NO 111

March 6 19 84

53-150/113

PAY TO THE ORDER OF Mahony Hawker-Giddings $ 7,000.00

Seven Thousand DOLLARS 00/100 CENTS

Shawmut
First County Bank, N.A.
Brockton, Massachusetts 02403

LIQUID INVESTMENT ACCOUNT

MEMO

Mary Lou Butler

:011301502: "104113059 6" 0111 "0000700000"

STUDD'S TRUST

NO 113

April 2 19 84

53-150/113

PAY TO THE ORDER OF Mahony, Hawker-Giddings $3,177.00

Three Thousand 00/100 DOLLARS CENTS

Shawmut
First County Bank, N.A.
Brockton, Massachusetts 02403

LIQUID INVESTMENT ACCOUNT

MEMO

Mary Lou Butler

:011301502: "104113059 6" 0113 "0000300000"

STUDD'S TRUST 112

March 28 84 53-150/113,

PAY TO THE ORDER OF Commonwealth of Massachusetts $ 14.31

Fourteen ——— 31/100 DOLLARS



Shawmut First County Bank, N.A. Brockton, Massachusetts 02403

LIQUID INVESTMENT ACCOUNT

Tracy Lee Butler

:011301507: 1041305 9 6: 0112 "000001431"

STUDD'S TRUST 115

April 9 84 53-150/113,

PAY TO THE ORDER OF Postmaster $ 130 00

One hundred and thirty —— NONE DOLLARS



Shawmut First County Bank, N.A. Brockton, Massachusetts 02403

LIQUID INVESTMENT ACCOUNT

Tracy Lee Butler

:011301507: 1041305 9 6: 0115 "000013000"

STUDD'S TRUST 109

Dec 11 84 53-150/113,

PAY TO THE ORDER OF Postmaster - Brockton $ 26 80

Twenty-six ——— 80/100 DOLLARS



Shawmut First County Bank, N.A. Brockton, Massachusetts 02403

LIQUID INVESTMENT ACCOUNT

134 stamps

Tracy Lee Butler

:011301507: 1041305 9 6: 0109 "000002680"

STUDD'S TRUST 116

Sept 17 84 53-150/113,

PAY TO THE ORDER OF Registrar of Motor Vehicles $ 7.80

Seven ——— 80/100 DOLLARS



Shawmut First County Bank, N.A. Brockton, Massachusetts 02403

LIQUID INVESTMENT ACCOUNT

Tracy Lee Butler

2 stamps

:011301507: 1041305 9 6: 0116 "000000780"

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APPENDIX G

8504054460 8

DAN J. BRADLEY
PO BOX 1398
WASHINGTON, D.C 20013

L.'s:

Boston, MA 02114

Dear Friend,

On July 14, U.S. Congressman Gerry Studds (D-MA) walked to the lectern on the floor of the House of Representatives and delivered in strong, confident tones a statement unlike any previously made in our national legislature:

> "All Members of Congress," said Studds, "must cope with the challenge of initiating and maintaining a career in public office without destroying entirely the ability to lead a meaningful and emotionally fulfilling private life. It is not a simple task for any of us to meet adequately the obligations of either public or private life, let alone both. But these challenges are made substantially more complex when one is, as am I, both an elected public official and gay."

With those words, Congressman Studds became the first member of Congress to publicly affirm his homosexuality.

Studds' historic statement came during the course of his response to charges made by the House Committee on Standards of Official Conduct that he had engaged in an improper sexual relationship with a 17-year-old male page in 1973, during his first term in office.

Studds was not the first public official to have difficulties related to homosexual activity, but he was the first not to hide from his own identity; the first not to cite "alcoholism," "drug problems," "psychological pressures," or even "homosexual tendencies" as an excuse. Gerry Studds just admitted to an error in judgement, and stated without shame or sorrow that he is gay.

In so doing, Studds set a standard for courage and dignity that will make it far easier for others to be open about being gay. His speech on the floor prompted thousands of letters congratulating him for his decision, and expressing gratitude for the strength and eloquence of his words. Let me quote from three of those letters:

> "I saw, heard and re-read many times your speech to the House. I was dumbstruck, and moved to tears by your courage, pride, honesty, poise and resoluteness. If I ever, myself, rise even half so well to half so trying a moment, I think I shall consider my life, to that moment, a success and my dues -- such as any might reckon them -- fully paid. At last, a Congressman I can look up to, who represents <u>me</u>!" -- From New York

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"When I heard your statement to Congress on NPR recently, I lofted my sheetrock hammer across the room and cheered. A Congressman comes out with class! -- sure, measured voice, no half-baked apologies, "gay" rather than "homosexual." You have my deep respect for transforming what must be a lonely, traumatic event into a noble moment for us all...you have done a fine and brave thing for all of us." -- From North Carolina

"I was proud of you today when I saw you standing before the House making your precise, fine-tuned statement. I was proud of the way you looked, proud of what you said, proud of the way you said it. You affirmed my/our complex presence in this world. I am sorry that such an affirmation is contingent on what is clearly a painful and embarassing time for you and those you love. Thank you for not running away. Thank you for your courageous, public, personal response...There are millions of gay people, who are prouder of themselves because of the way you have chosen to publicly respond to the realities of your life." -- From Oregon

Gerry Studds' decision to be honest and open about himself was, he says, personally the best thing he has ever done. He feels great.

But, not everyone understands. It is likely that the refusal by Congressman Studds to be more visibly contrite about his past mistake, and about his sexual preference, in general, contributed to the decision by the House of Representatives to vote to censure him on the House floor. It is likely, as well, that the investigation concerning Studds which was made by the House Committee on Standards of Official Conduct, was far more extensive and exhaustive than it would have been if a heterosexual relationship had been involved. Consider, for example, that the Committee began investigating charges concerning misbehavior by Members of Congress in 1981 and 1982. How much time and how much work did it take to inquire all the way back to 1973 to expose a relationship which was, even according to the Committee, without coercion, which did not involve any preferential treatment, express or implied, which did not include any harassment of any kind, and which involved a young man who was for legal purposes, an adult?

During the course of its investigation, the Committee spent hundreds of thousands of dollars and interviewed hundreds of people, inquiring into virtually every phase of Congressman Studds' personal life for the past ten years. At the start, Studds refused to hire a lawyer. But ultimately, as the investigation went on, and friends and staff members were subjected to repeated interrogation, he relented. The legal bills ultimately exceeded $40,000, money Studds does not have.

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Recently, a group of supporters from Congressman Studds' district in Massachusetts, from Washington, and elsewhere around the country, established a Trust Fund to help defray these legal expenses. About one-half the money has already been raised. I would like to ask you to join in making a contribution to this Trust, the proceeds from which will be used exclusively to re-pay these legal fees.

By making such a contribution, you will do far more than help alleviate this debt. You will be telling Gerry Studds that you appreciate his decision to tell the truth about his sexuality, and his determination to insist that sexual preference is irrelevant to a person's performance in professional life.

In addition, you will bolster the groundswell of sentiment within the Gay Community -- a sentiment matched only by Studds' own Massachusetts constituents -- that he should run for re-election this fall. That decision will be, for him, an enormously difficult and intensely personal choice. A political campaign is always arduous under any circumstances, but in 1984, for Gerry Studds, it promises to be brutal indeed.

I know Gerry Studds, and I have followed with interest his career in Congress. During his 12 years in office, he has gained a reputation for hard work, accessibility, personal honesty, and intense dedication to the vital economic and environmental concerns of his district encompassing the southeastern Massachusetts coast. Above all, Congressman Studds has displayed throughout his career the kind of eloquence and wit so rarely found in politics today; an eloquence which has made him one of our most persuasive defenders of human rights and civil liberties both within the United States and in international affairs; and which -- as evidenced by his speech last July 14 -- grants him the ability to communicate his ideas with a unique and commanding strength.

Congressman Studds' constituents agree. After barely winning election for the first time in 1972, he has steadily increased his margin of victory. In 1982, he received 68 percent of the vote, and carried every town and precinct in his district.

But 1984 promises to be very different and a far more difficult kind of campaign. Several local politicians have announced their intention to campaign for Studds' seat, and he has been targeted by right-wing organizations as a prime candidate for defeat.

I believe it is important that Gerry Studds be re-elected. He is a superb Congressman. Our country needs many more with his talent and dedication. Simply by doing his job the way he has in the past, Studds will be serving his constituents, and making it easier every day for all of us to argue openly that sexual preference is no bar to competence, effectiveness or public respect.

A contribution to the Studds Trust Fund will have an important practical effect. It will tell Congressman Studds that he has the

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support he needs to make it through the year ahead. It will let him know that we deeply admire and respect the way he handled himself during the investigation and House vote. He has given thousands of gay men and lesbians who have faced similar allegations and inquiries into their personal lives reason to be proud.

By making a contribution to the Studds Trust Fund, you can send Gerry Studds your vote of confidence, to encourage him to run in 1984. You can send a message of friendship and support to a hard-working congressman who deserves the very best. Please make your check payable to the Studds Trust Fund and send it to my attention, c/o Dan J. Bradley, Co-Chair, Human Rights Campaign Fund, P.O. Box 1396, Washington, D.C 20013.

Thank you for your continued support of the Human Rights Campaign Fund.

Sincerely,

Dan J Bradley

Dan J. Bradley
Co-Chair
Human Rights Campaign Fund

P.S. Congressman Gerry Studds is a co-sponsor of the federal gay civil rights legislation. He has spoken out frequently on issues of concern to gay men and lesbians.

8504046 12

I want Congressman Studds to know how much I admire and respect the stand he took in Congress. Enclosed is my check of:

☐ $25 ☐ $50 ☐ $75 ☐ $100 ☐ Other _____

Keep up the good work!

Make check payable to:
Studds Trust Fund.
Send it with this form to
c/o Dan J. Bradley, P.O. Box 1396,
Washington, D.C. 20013.

Check one, to charge your remittance:

☐ MasterCard ☐ Visa

_____

Your credit card number (All digits, please)

Mo _____ Yr _____

Credit Card
valid thru

_____

(Your Signature)

NO POSTAGE
NECESSARY
IF MAILED
IN THE
UNITED STATES

BUSINESS REPLY MAIL
FIRST CLASS PERMIT NO. 12998 WASHINGTON, D.C.

POSTAGE WILL BE PAID BY

DAN J. BRADLEY
c/o HRCF
P.O. Box 1396
Washington, D.C. 20013

8 5 0 4 0 5 4 4 6 1 3

Studds for Congress
38 Rosa's Lane
Scituate, MA 02066

Ms. Maura White
Office of the General Counsel
Federal Elections Commission
1325 K Street, NW
Washington, DC 20463

HAND DELIVERED

85040054461 4

BROWN, RUDNICK, FREED & GESMER

MATTHEW BROWN
ALFORD R RUDNICK
HIRSH FREED
HENRY GESMER
MARVIN N. GELLER
JACK H. CALECHMAN
DONALD E. PAULSON
KENNETH A. KORB
PETER D. GENS
LAWRENCE M. LEVY
STEPHEN WOLFBERG
PHILIP C. SCHNEIDER
M. FREDERICK PRITZKER
JOEL M. RECK
ANDRE C. JASSE, JR.
JEFFREY M. FREEDMAN
CARL E. AXELROD
GERALD R TISHLER
SHELDON M. DRUCKER

PETER B. FARROW
DANIEL D. SULLIVAN
DAVID G. STERN
M. ROBERT DUSHMAN
ROBERT E. BROOKS
JAMES E. MCGUIRE
JOSEPH F. RYAN
ELIZABETH A. RITVO
FORREST DAVID MILDER
MARC D. CUMSKY
NEAL B. GLICK
DAVID H. MURPHREE
JOHN ACHATZ
HOWARD L. LEVIN
JOY BARRON RACHLIN
STEPHEN A. HANTMAN
BARBARA A. LENK
LOUIS C. MILLER
MARILYN D. STEMPLER

SHARON GODDARD WHITE
NANCY R. WILSKER
HOWARD G. ZAHAROFF
RICHARD A. DOPPELT
PRESTON W. HALPERIN
JEFFERY L. KEFFER
JONATHAN KLEIN
STEVEN B. LEVINE
JOHN A. WORTMANN, JR.
WARREN D. HUTCHISON
KATHRYN WALSH
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THOMAS J. RAUBACH
DENISE N. YURKOFSKY
KATHLEEN A. LAROCQUE
WILLIAM R. BALDIGA
MICHAEL S. BENJAMIN
RONALD M. FELLMAN
JEFFREY W. SACKS

COUNSELLORS AT LAW

ONE FEDERAL STREET, BOSTON, MASS. 02110

TELECOPIER: 542-3004 · CABLE: "LAWFIRM" BOSTON

TELEPHONE (617) 542-3000

COUNSEL
EDWARD SCHNEIDER
AARON J. BRONSTEIN

OF COUNSEL
JOHN F. COLLINS, P.C.
ROY N. FREED

RECEIVED AT THE FEC
GCC#5586
84 NOV 13 P12:09

November 9, 1984

EXPRESS MAIL

Maura White, Esquire
Federal Election Committee
1325 K Street, N.W.
Washington, D.C. 20463

Re: Your File No. MUR 1744 - METRO

84 NOV 13 P1:26
GENERAL COUNSEL

Dear Ms. White:

As per your telephone conversation this day with my associate, Eric Allon, enclosed please find a copy of the "display ad" as it appeared in the April, 1984 issue of the Metro Sunday Times and a copy of the written acknowledgment of who paid for that ad as it appeared in the May, 1984 issue of the Metro Sunday Times. These enclosures were inadvertently omitted from my letter of November 7, 1984.

I apologize for any inconvenience this may have caused.

Very truly yours,

Jeffrey M. Freedman

Jeffrey M. Freedman

JMF/alp
Enclosures

3504054615

Club Café

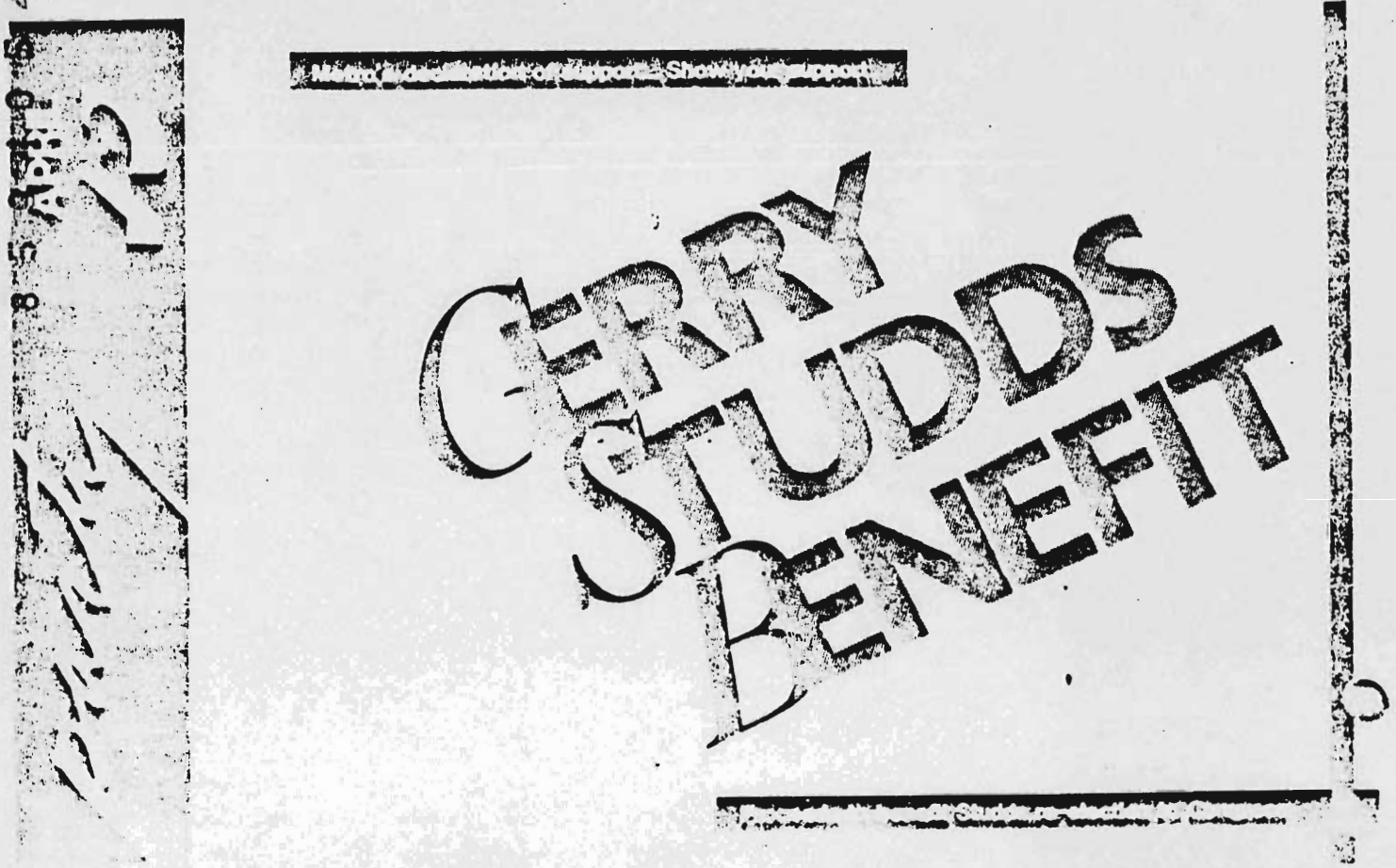
209 Columbus Ave.

The newest and hottest alternative to Boston's restaurant and bar scene.

Now featuring a full liquor bar with live entertainment Thursday, Friday & Saturday 9pm – midnight and Sunday brunch noon – up.

Happy hour 7days a week 3pm – 7pm
House drinks $1.75
Miller & Lite $1.00

Reservations suggested 536-0966



3502405446617



Metro Sunday Times
7 Lansdowne St. Boston
262-2424

Boston/Worcester

Publisher
George Tamsitt

Art Director
Mike Hoffman

Designer
Kevin McIntire

Sun., May 20 - PROM NIGHT
Sun., May 31 - 2 FOR 1 KICKOFF
Sun., June 17 - "A Night in White"
GAY PRIDE CELEBRATION

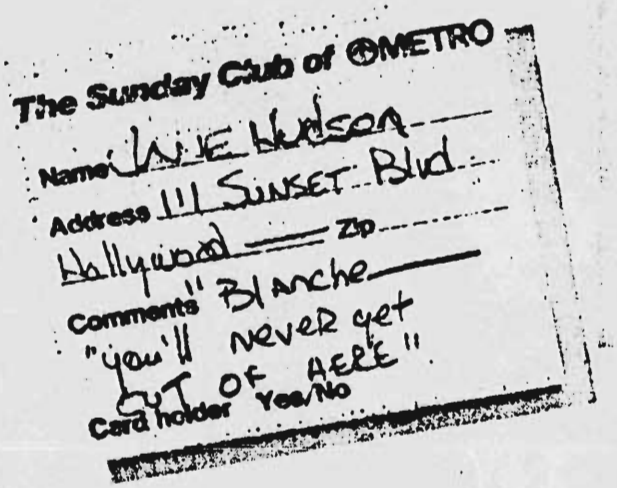
Spirit

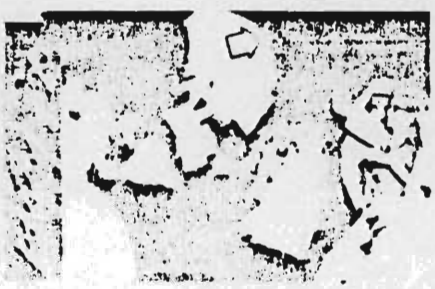
Thurs., May 3 - BILL NELSON
Wed., May 9 - NOVEMBER GROUP
Thurs., May 10 - SEX FACES

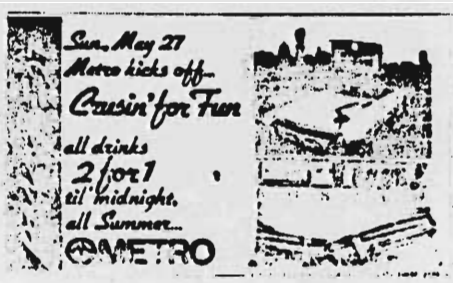
Thurs., May 17 - SKIN
Thurs., May 25 - RODS & CONES
Fri., May 25 - CARMEN MIRANDA NIGHT
Thurs., May 31 - VIOLENT FEMMES

Unfortunately, George Tamsitt was unable to make his deadline this month (due to the KISS-108 party). He'll be back next month. He did want to say --

We regret the fact that we omitted the line "Paid for by Studds for Congress Committee" in our April Edition. (April 15 fundraiser)







OWN, RUDNICK, FREED & GESMER
ONE FEDERAL STREET
BOSTON, MASSACHUSETTS 02110

8504054461 8

84 NOV 13



PRESS HARD
YOU ARE MAKING 4 COPIES

FROM:

JEFFREY M. FREEDMAN, ESQUIRE
BROWN, RUDNICK, FREED & GESMER
ONE FEDERAL STREET
BOSTON, MA 02110

Customer Number, if any:

TO:

MAGDA WHITE, ESQUIRE
FEDERAL ELECTION COMMITTEE
1325 K STREET, N.W.
WASHINGTON, D.C. 20463

Label 11-B, Jan. 1983 ★ U.S.G.P.O. 1982-384-133

$6120/7

EXPRESS MAIL NEXT DAY SERVICE
POST OFFICE TO ADDRESSEE

ORIGIN

Initials of Receiving Clerk

Date In | Time In

Return Receipt Service
☐ To Whom & Date Del.
☐ To Whom, Date & Address of Del.

Weight

Postage & Fees $ 9.35

B 20375669

DESTINATION

Date Del. 11/13 | Time 1134

Initials of Del. Emp.

Signature of Addressee or Agent

DELIVERY WAS ATTEMPTED
Date | Time
Notice Left By

EXPRESS MAIL SERVICE

▼ TO REMOVE, PEEL BACK HERE ▼

REMOVE copies 1 & 2 with this stub (Postal Service Personnel Only)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 13, 1984

Andrew Buschbaum, Esquire
9406 Biltmore Drive
Silver Spring, Md. 20901

Re: MUR 1744

Dear Mr. Buschbaum:

This is in response to your letter dated November 8, 1984, in which you request a 30 day extension of time to respond to the Commission's reason to believe finding against your clients, the Committee to Re-Elect Congressman Studds, Edwin M. Martin, Jr., as treasurer, and the Studds Trust Fund.

I have reviewed your request and agree to the requested extension. The response of your clients is due, therefore, on December 10, 1984. If you have any questions please contact Maura White at 523-4143.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

8504044612

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 9, 1984

Jeffrey M. Freedman, Esquire
Brown, Rudnick, Freed and Gesmer
One Federal Street
Boston, Massachusetts 02110

Re: MUR 1744

Dear Mr. Freedman:

This is in response to your letter dated November 1, 1984, in which you request a ten day extension of time to respond to the reason to believe finding made against your client, Metro.

I have reviewed your request and agree to the requested extension. The response of your client is due, therefore, on November 15, 1984. If you have any questions please contact Maura White at 202-523-4143.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

8504046200

Human Rights Campaign Fund

Post Office Box 1206 Washington, D.C. 20013

RECEIVED AT THE FEC
84 NOV 6 A8:42

84 NOV 9 A9:41

November 2, 1984

Ms. Maura White
Federal Election Commission
1325 K Street, NW
Washington, DC 20463

RE: MUR-1744

Dear Ms. White:

I am writing with regard to the letter of the Commission finding that there is "reason to believe" that a violation of the Act has occurred because the Human Rights Campaign Fund failed to report a contribution to the Committee to Re-Elect Congressman Studds in connection with its payment of a solicitation letter for the Studds Trust Fund.

As was pointed out in the previous letter from the Fund to the Commission with regard to this matter, the solicitation letter from Dan Bradley, which apparently is the basis for the allegation, explicitly stated that contributions sought by the letter were to be made to the Studds Trust Fund and that the proceeds were to be used exclusively to help re-pay Congressman Studds' legal fees for matters related to the House investigation.

The Fund relied upon several Advisory Opinions of the Commission in sending out this Solicitation. In AO 1983-21 the Commission advised that to the extent the proposed Studds' Trust Fund was used exclusively for the purpose of paying the costs of a legal defense arising from Congressional or other proceedings not involving compliance or audit matters under the Act, donations to and disbursements from the Trust would not constitute contributions or expenditures under the Act. Accordingly, neither the source nor the amount of donations to the Trust would be limited under the Act or regulations, nor would the Act or regulations require any reporting of receipts or payments of the Trust. See also AO's 1979-37 and 1981-13. Following the logic of those Advisory Opinions, the solicitation of contributions to be given exclusively to a legal defense fund would not be a contribution subject to the provisions of the Act.

3504046211

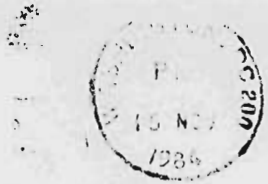
If you have any additional questions we would be happy to attempt to answer them.

Sincerely,

Victor J. Basile
Treasurer

3504054462 2

Human Rights
Campaign Fund
Post Office Box 1396, Washington, DC 20013





Ms. Maura White
Federal Election Commission
1325 K Street, NW
Washington, DC 20463

84 NOV 6 A8:41

3 5 0 4 0 5 4 4 6 2

GCC#5550

Studds for Congress

November 8, 1984

Maura White
Office of the General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C.

'84 NOV 8 P4:22

RE: MUR 1744
Request for an extension of time to reply to the Commission's "reason to believe" finding

Dear Ms. White,

This letter is in response to your letter of October 23, 1984 informing the Committee to Re-Elect Congressman Studds ("the Committee") and its treasurer, Edwin M. Martin, Jr., of the Commission's "reason to believe" finding that the Committee violated reporting and disclosure requirements of the Federal Election Campaign Act on four separate occasions. Your letter proposes that the Committee and the Commission begin the conciliation process, and requests that the Committee submit any additional information about the four alleged violations. Your letter requests that the Committee respond within ten days of the Committee's receipt of the letter on October 31, that is, by November 13 (allowing for the federal holiday on November 12).

The Committee is eager to meet with you and begin the conciliation process as soon as possible. We have additional important information that we believe will help to resolve the issues raised in your letter. However, because of the November 6 elections and the schedules of Congressman Studds, Mr. Martin, and Congressman Studds' campaign manager, Peter Fleischer, we must ask for an extension of 30 days to allow us to gather that information.

As you know, Congressman Studds and the Committee have been involved in a heated reelection campaign that culminated with Congressman Studds' victory on November 6. Congressman Studds and the Committee cannot reasonably be expected to provide additional information by November 13. Mr. Martin

3504054624

South Shore headquarters: Standish Village Plaza (Rt. 139), Pembroke, MA 02359 (617) 826-7561
Greater New Bedford headquarters: 1114 Acushnet Avenue, New Bedford, MA 02746 (617) 997-1541
Cape and Islands headquarters: 73B Center Street, Hyannis, MA 02601 (617) 771-6084

Authorized by the Studds for Congress Committee.

and Mr. Fleischer, both of whom possess important information relating to the issues raised by the Commission, have unavoidable prior commitments and will be out of town from November 10 through November 27. Congressman Studds has commitments in Massachusetts through the first week in December.

We therefore request an additional 30 days, until December 10, 1984, to gather information and arrange for a meeting with you to begin the conciliation process. We are confident that this matter can be resolved satisfactorily and quickly at that time.

We regret that we could not provide you with the additional information bearing on the issues raised by your letter in our response to the original complaint. However, because the original complaint did not clearly set out the specific charges raised in your letter of October 23, we were not aware that the Commission was considering those charges. We believe that the additional information possessed by Congressman Studds and members of his Committee will resolve your concerns.

Thank you for giving this matter your attention. We look forward to your prompt reply.

Sincerely,

Andrew Buchsbaum
Counsel for the Committee to
Re-Elect Congressman Studds

8504054623

STATEMENT OF DESIGNATION OF COUNSEL

MUR [redacted]

NAME OF COUNSEL: Andrew Buchsbaum

ADDRESS: 9406 Biltmore Drive
Silver Spring, MD 20901

TELEPHONE: 624- 8390

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.

11/8/84
Date

Edwin M. Martin Jr.
Signature
Treasurer
Stubbs for Congress Committee

RESPONDENT'S NAME: EDWIN M. MARTIN JR.

ADDRESS: 1201 PENNSYLVANIA AVE.
WASHINGTON, D.C. 20004

HOME PHONE: 301 - 469 - 5970

BUSINESS PHONE: 202 - 393 - 0800

8504054426

Massachusetts 02061

3504046227

Maura White
Office of the General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

RECEIVED AT THE FEC

84 NOV 9 A9:01

BROWN, RUDNICK, FREED & GESMER

MATTHEW BROWN
ALFORD P. RUDNICK
HIRSH FREED
HENRY GESMER
MARVIN N. GELLER
JACK H. CALECHMAN
DONALD E. PAULSON
KENNETH A. KORB
PETER D. GENS
LAWRENCE M. LEVY
STEPHEN WOLFBERG
PHILIP C. SCHNEIDER
M. FREDERICK PRITZKER
JOEL M. RECK
ANDRE C. JASSE, JR.
JEFFREY M. FREEDMAN
CARL E. AXELROD
GERALD R TISHLER
SHELDON M. DRUCKER

PETER B. FARROW
DANIEL D. SULLIVAN
DAVID G. STERN
M. ROBERT DUSHMAN
ROBERT E. BROOKS
JAMES E. McGUIRE
JOSEPH F. RYAN
ELIZABETH A. RITVO
FORREST DAVID MILDER
MARC D. CUMSKY
NEAL B. GLICK
DAVID H. MURPHREE
JOHN ACHATZ
HOWARD L. LEVIN
JOY BARRON RACHLIN
STEPHEN A. HANTMAN
BARBARA A. LENK
LOUIS C. MILLER
MARILYN D. STEMPLER

SHARON GODDARD WHITE
NANCY R. WILSKER
HOWARD G. ZAHAROFF
RICHARD A. DOPPELT
PRESTON W. HALPERIN
JEFFERY L. KEFFER
JONATHAN KLEIN
STEVEN B. LEVINE
JOHN A. WORTMANN, JR.
WARREN D. HUTCHISON
KATHRYN WALSH
GORDON R. PENMAN
THOMAS J. RAUBACH
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KATHLEEN A. LAROCQUE
WILLIAM R. SALDIGA
MICHAEL S. BENJAMIN
RONALD M. FELLMAN
JEFFREY W. SACKS

COUNSELLORS AT LAW

ONE FEDERAL STREET, BOSTON, MASS. 02110

TELECOPIER: 542-3004 · CABLE: "LAWFIRM" BOSTON

TELEPHONE (617) 542-3000

COUNSEL
EDWARD SCHNEIDER
AARON J. BRONSTEIN

OF COUNSEL
JOHN F. COLLINS, P.C.
ROY N. FREED

November 7 , 1984

84 NOV 9 A10:37

GENERAL COUNSEL

Maura White, Esq.
Federal Election Committee
1325 K Street, N.W.
Washington, D.C. 20463

Your File No.: MUR 1744
Metro

Dear Ms. White:

Brown, Rudnick, Freed & Gesmer represents That's Entertainment, Inc., d/b/a Metro. We have been designated as counsel by That's Entertainment, Inc. in connection with the Federal Election Commission's investigation of Metro's possible violation of 2 U.S.C.§441b(a), a provision of the Federal Election Campaign Act of 1971, as amended (the "Act"). This letter and accompanying materials will demonstrate that no action should be taken against Metro because there has been no violation of the Act and that the Federal Election Commission (the "FEC") should close the file on the matter.

In the FEC's letter to Metro dated October 23, 1984, it was stated that the FEC's determination that there was reason to believe that Metro violated 2 U.S.C.§441b(a) was based on the General Counsel's Factual and Legal Analysis of the matter. In that analysis, it was stated that Metro made a prohibited "contribution" under the Act when it advertised an April 15, 1984 fundraiser for Representative Studds in a "display ad" on the back cover of the April, 1984 issue of the Metro Sunday Times. The General Counsel indicated that the "display ad" did not state who absorbed the cost of the ad. The language in the ad - "Metro's declaration of support. . . show your support" and "Proceeds to benefit Studds' re-election to Congress" - suggested to the General Counsel that the ad was paid for by Metro.

In fact, the Studds for Congress Committee (the "Committee") paid for the "display ad". A copy of the Committee's check to

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cover the cost of the fundraiser, including the cost of the "display ad", is enclosed with this letter. Because the Committee, not Metro, paid for that ad, Metro made no improper corporate contribution to a federal election and thus did not violate the Act.

The fact that the ad did not state who absorbed its cost was simply an oversight. A written acknowledgement of this oversight was made in the May, 1984 issue of the Metro Sunday Times: "We regret the fact that we omitted the line 'Paid for by Studds for Congress Committee' in our April edition. (April 15 fundraiser)." A copy of the "display ad" as it appeared in the April, 1984 issue of the Metro Sunday Times and a copy of the written acknowledgement of who paid for that ad as it appeared in the May, 1984 issue of the Metro Sunday Times are enclosed with this letter.

Upon a review of the factual material submitted with this letter and for the reasons stated above, the FEC should find that Metro has not violated the Act and that the FEC should close the file on the matter.

If we can be of further assistance in the prompt disposition of this matter, please call or write.

Very truly yours,

Jeffrey M. Freedman

Jeffrey M. Freedman

JMF/tk
encl
20,164(1)
11/07/84:dvj

cc: Mr. Edward Sparks
Mr. Patrick Lyons
Eric Allon, Esquire

8504346229

THE COMMITTEE TO RE-ELECT
CONGRESSMAN STUDDS

2402

April 24 19 84 53-447/113

PAY TO THE ORDER OF Entertainment, Inc $ 2,229.50

Two Thousand, two hundred and twenty-nine 50/100 DOLLARS

Rockland Trust Company
Rockland, Massachusetts 02370

FOR, use of facilities, promotional activities

Mary Lee Burden

⑆011304478⑆ 3⑈022⑈8116 "0000222950"

8504054630

8 5 0 4 0 5 4 4 6 3 1

FOR DEPOSIT ONLY IN
070-762-5
THAT'S ENTERTAINMENT INC.
D/B/A METRO-SPIT

AP 84 30
SHAWMUT BANK
OF BOSTON, N.A.
PAY ANY BANK

⑈050576⑈93

BROWN, RUDNICK, FREED & GESMER
ONE FEDERAL STREET
BOSTON, MASS. 02110

8504054463



Maura White, Esquire
Federal Election Committee
1325 K Street, N.W.
Washington, D.C. 20463

84 NOV 9 A9:01

OSC# 5469
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84 NOV 2 AM : 06

BROWN, RUDNICK, FREED & GESMER

MATTHEW BROWN
ALFORD R RUDNICK
HIRSH FREED
HENRY GESMER
MARVIN N. GELLER
JACK H. CALECHMAN
DONALD E. PAULSON
KENNETH A. KORB
PETER D. GENS
LAWRENCE M. LEVY
STEPHEN WOLFBERG
PHILIP C. SCHNEIDER
M. FREDERICK PRITZKER
JOEL M. RECK
ANDRE C. JASSE, JR.
JEFFREY M. FREEDMAN
CARL E. AXELROD
GERALD R TISHLER
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PETER B. FARROW
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ROBERT E. BROOKS
JAMES E. McGUIRE
JOSEPH F. RYAN
ELIZABETH A. RITVO
FORREST DAVID MILDER
MARC D. CUMSKY
NEAL S. GLICK
DAVID H. MURPHREE
JOHN ACHATZ
HOWARD L. LEVIN
JOY BARRON RACHLIN
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SHARON GODDARD WHITE
NANCY R. WILSKER
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WARREN D. HUTCHISON
KATHRYN WALSH
GORDON R. PENMAN
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DENISE N. YURKOFSKY
KATHLEEN A. LAROCQUE
WILLIAM R. BALDIGA
MICHAEL S. BENJAMIN
RONALD M. FELLMAN
JEFFREY W. SACKS

COUNSELLORS AT LAW

ONE FEDERAL STREET, BOSTON, MASS. 02110

TELECOPIER: 542-3004 · CABLE: "LAWFIRM" BOSTON

TELEPHONE (617) 542-3000

COUNSEL
EDWARD SCHNEIDER
AARON J. BRONSTEIN

OF COUNSEL
JOHN P. COLLINS, P.C.
ROY N. FREED

November 1, 1984

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

Your File No.: MUR 1744
Metro

2 NOV 84 P1:03

Dear Ms. White:

Pursuant to Eric Allon's conversation with you of this date, we are requesting an extension of ten (10) days to respond to the Federal Election Commission's determination that there is reason to believe Metro violated 2 U.S.C. § 441b(a), a provision of the Federal Election Campaign Act of 1971, as amended. We need the additional time to gather factual materials which are relevant to the Commission's consideration of this matter.

Enclosed with this letter is a Statement of Designation of Counsel.

We would appreciate your prompt attention in this matter regarding the extension.

Very truly yours,

Jeffrey M. Freedman

Jeffrey M. Freedman

JMF/ja
cc: Eric R. Allon

8 5 0 4 0 5 4 1 4 6 3 3

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1744

NAME OF COUNSEL: JEFFREY M. FREEDMAN

ADDRESS: BROWN, RUDNICK, FREED & GESMER
ONE FEDERAL STREET
BOSTON, MA 02110

TELEPHONE: 542-3000

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.

THAT'S ENTERTAINMENT, INC. d/b/a METRO

10/29/84
Date

BY: ✓ [signature]
Signature PATRICK T. LYONS, President

RESPONDENT'S NAME: THAT'S ENTERTAINMENT, INC. d/b/a METRO

ADDRESS: 7 Lansdowne Street
Boston, MA

HOME PHONE:

BUSINESS PHONE: 262-2424

3504054634

8504054463

ED & GESMER
TREET
ETTS 02110

84 NOV 2 All

FIRST CLASS MAIL



YOU ARE MAILING 4 COPIES

FROM:

JEFFREY M. FRIEDMAN, ESQUIRE
BROWN, RUDNICK, FREED & GESMER
ONE FEDERAL STREET
BOSTON, MASSACHUSETTS

Customer Number, if any

TO:

MAURA WHITE, ESQUIRE
FEDERAL ELECTION COMMISSION
1325 K STREET, N.W.
WASHINGTON, D.C 20463

#6120/7

Label 11-B, Jan. 1983 ★ U.S.G.P.O. 1982-384-133

EXPRESS MAIL
NEXT DAY SERVICE

POST OFFICE TO ADDRESSEE

ORIGIN

B 20375721

DESTINATION

DELIVERY WAS ATTEMPTED

EXPRESS MAIL SERVICE

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 23, 1984

Edwin M. Martin, Jr., Treasurer
Committee to Re-Elect Congressman Studds
P.O. Box 5
Norwell, Massachusetts 02601

RE: MUR 1744
Committee to Re-Elect
Congressman Studds; Edwin M.
Martin, Jr., as treasurer

Dear Mr. Martin:

The Federal Election Commission notified the Committee to Re-Elect Congressman Studds ("Committee") and you, as treasurer, on July 31, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

Upon further review of the allegations contained in the complaint, and information supplied by you, the Commission, on October 16, 1984, determined that there is reason to believe the Committee and you, as treasurer, violated 2 U.S.C. §§ 434(b)(5)(A), 441b(a), and 434(b)(3)(B), and 11 C.F.R. §§ 104.13 and 104.3(b)(4)(i) and (A). Specifically, it appears that the Committee failed: to properly disclose two expenditures to the Rockland Trust Company (May 15, 1984, and June 15, 1984) involving credit card transactions (2 U.S.C. § 434(b)(5)(A) and 11 C.F.R. § 104.3(b)(4)(i) and (A)); accepted an in-kind contribution from Metro (7-9 Landsdowne Corporation) in connection with a display ad in the Metro Sunday Times (2 U.S.C. § 441b(a)); and, failed to report the receipt of an in-kind contribution from the Human Rights Campaign Fund ("Fund") in connection with a solicitation letter mailed by the Fund which was, in part, for the purpose of influencing a federal election (2 U.S.C. § 434(b)(3)(B) and 11 C.F.R. § 104.13).

In addition, the Commission also determined that there is reason to believe the Studds Trust Fund violated 2 U.S.C. § 433 and § 434 by failing to register and report as a political committee as a result of its transfer of $1,768 to the Human Rights Campaign Fund on July 30, 1984.

8504054635

You may submit any factual or legal materials that you believe are relevant to the Commission's analysis of this matter. Please file any such response within ten days of your receipt of this notification.

The Office of General Counsel would like to settle this matter through conciliation prior to a finding of probable cause. However, in the absence of any information which demonstrates that no further action should be taken against your committee, you, as treasurer, and the Studds Trust Fund, the Office of General Counsel must proceed to the next compliance stage.

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 Maura White, the staff member assigned to this matter, at (202) 523-4143.

Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 23, 1984

Victor J. Basile, Treasurer
Human Rights Campaign Fund
713 D Street, S.E.
Washington, D.C. 20003

RE: MUR 1744
Human Rights Campaign Fund;
Victor J. Basile, as treasurer

Dear Mr. Basile:

The Federal Election Commission notified the Human Rights Campaign Fund and you, as treasurer, on July 31, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

Upon further review of the allegations contained in the complaint, and information supplied by you, the Commission, on October 16 , 1984, determined that there is reason to believe the Human Rights Campaign Fund and you, as treasurer, have violated 2 U.S.C. § 434(b)(6)(B)(i), a provision of the Act. Specifically, it appears that the Human Rights Campaign Fund failed to report a contribution to the Committee to Re-Elect Congressman Studds in connection with its payment of a solicitation letter for the Studds Trust Fund which was, in part, for the purpose of influencing a federal election.

You may submit any factual or legal materials that you believe are relevant to the Commission's analysis of this matter. Please file any such response within ten days of your receipt of this notification.

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

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

If you have any questions, please contact Maura White, the staff member assigned to this matter, at 523-4143.

Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 23, 1984

Metro (7-9 Landsdowne Corporation)
7 Landsdowne Street
Boston, Massachusetts 02215

RE: MUR 1744
Metro (7-9 Landsdowne Corporation)

Dear Sir or Madam:

On October 16 , 1984, the Federal Election Commission determined that there is reason to believe Metro (7-9 Landsdowne Corporation) violated 2 U.S.C. § 441b(a), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against Metro (7-9 Landsdowne Corporation). You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter within ten days of your receipt of this letter. In addition, please submit a copy of the display ad which appeared in the Metro Sunday Times with respect to a fundraiser for Representative Studds held at Metro on April 15, 1984.

In the absence of any additional information which demonstrates that no further action should be taken against Metro (7-9 Landsdowne Corporation) the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if so desired. See 11 C.F.R. § 111.18(d).

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

The investigation now being conducted will be confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A),

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unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Maura White, the staff member assigned to this matter, at (202) 523-4143.

Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

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

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GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO. 1744

RESPONDENT: Metro (7-9 Landsdowne Corporation)

SUMMARY OF ALLEGATIONS

Metro (7-9 Landsdowne Corporation) made a contribution to the Committee to Re-Elect Congressman Studds by placing an advertisement in the Metro Sunday Times in connection with a federal election, in the violation of 2 U.S.C. § 441b(a).

FACTUAL BASIS AND LEGAL ANALYSIS

In the April 20, 1984, edition of the Patriot Ledger it was reported that Representative Studds "will check with federal election officials before he accepts money from a fundraiser held on 'gay night' at the Boston nightclub Metro, a spokesman for the Congressman said yesterday." According to the Patriot Ledger, the spokesman, Peter Fleischer, "said the problem was that Metro may advertised for the event in The Metro Sunday Times, a newsletter oriented toward the gay community." It was reported that "Fleischer said the campaign committee paid for the actual fund-raiser which was held Sunday. He said $3 was charged at the door; $2 went to Studds and $1 paid for the use of the nightclub." Another news article in The Enterprise (April 19, 1984, edition) also referred to a "Studds fundraising event which was promoted in a Boston gay newsletter called the Metro Sunday Times." The Enterprise reported that "[a] signed letter

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from George Tamsitt -- described as the promotion manager of the club -- noted that '... we will be hosting Gerry Studds and raising money for his re-election' April 15 at the club." According to The Enterprise, the "newsletter also featured, on the back cover, a display advertisement calling attention to the 'Gerry Studds Benefit,' which was 'Metro's declaration of support... show your support'." The Enterprise also stated that there "was no mention anywhere in the advertisement that it was paid for by anyone associated with the Studds campaign."*/

Pursuant to 2 U.S.C. § 441b(a), a corporation is prohibited from making a contribution or expenditure in connection with a federal election, and a political committee is prohibited from knowingly accepting or receiving any contribution prohibited by 2 U.S.C. § 441b(a).

As set forth at 2 U.S.C. § 431(8)(A)(i) the term contribution includes any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for federal office. The term "expenditure" is defined at 2 U.S.C. § 431(9)(B)(i) to include any purchase, payment, distribution, loan, advance, deposit, or gift of money or anything of value, made by any person for the purpose of influencing any election for federal office. The term "anything of value" includes all in-kind contributions. 11 C.F.R. § 100.8(a)(1)(iv)(A).

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*/ In contrast to the Patriot Ledger, The Enterprise reported Peter Fleischer as saying that the campaign did not pay any of the costs of running the fundraiser at Metro.

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The question which arises herein from the information reported in the Patriot Ledger and The Enterprise is whether Metro, a Boston nightclub at which the April 15, 1984, fundraiser for Representative Studds was conducted, made a "contribution" in connection with a federal election when it advertised the event in a "display ad" on the back cover of the Metro Sunday Times. Metro is an incorporated entity and, hence, prohibited from making a contribution or expenditure in connection with a federal election. The Committee to Re-Elect Congressman Studds ("Committee") was apparently aware of the ad in that the Committee's agent, Peter Fleischer, acknowledged to the Patriot Ledger that Metro may have advertised the event in the Metro Sunday Times. Moreover, the advertisement itself apparently did not state who absorbed its cost. Indeed, the purported language in the display ad that the event constitutes "Metro's declaration of support ... show your support" suggests that the ad was paid for by Metro. It is this office's view that such language, in combination with the statement "Proceeds to benefit Studds' re-election to Congress" constitutes an expenditure in connection with a federal election and, hence, an in-kind contribution to Representative Studds. That the Committee might have eventually reimbursed Metro for the cost of the ad does not negate the fact that a prohibited in-kind contribution was made by Metro.

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Although it may be argued that an (incorporated) entity whose business involves promotional events must be allowed in its ordinary course to promote those events, it is the language of the instant advertisement which brings it outside the scope of permissibility, in this office's view. Hence, it is the recommendation of this office that the Commission find reason to believe Metro (7-9 Landsdowne Corp.) violated 2 U.S.C. § 441b(a) by making a contribution in connection with a federal election.

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Committee to Re-Elect Congressman Studds	)	
Edwin M. Martin, Jr., as treasurer	)	MUR 1744
Human Rights Campaign Fund	)	
Victor J. Basile, as treasurer	)	
Studds Trust Fund	)	

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of October 16, 1984, do hereby certify that the Commission took the following actions in MUR 1744:

1. Decided by a vote of 4-2 to find reason to believe the Committee to Re-Elect Congressman Studds and Edwin M. Martin, Jr., as treasurer, violated 2 U.S.C. § 434(b)(5)(A) and 11 C.F.R. §§ 104.3(b)(4)(i) and 104.3(b)(4)(i)(A).

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

2. Decided by a vote of 6-0 to find reason to believe the Committee to Re-Elect Congressman Studds and Edwin M. Martin, Jr., as treasurer, violated 2 U.S.C. § 441b(a).

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

(continued)

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3. Decided by a vote of 5-1 to find reason to believe Metro (7-9 Landsdowne Corp.) violated 2 U.S.C. § 441b(a).

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

4. Decided by a vote of 6-0 to find reason to believe the Committee to Re-Elect Congressman Studds and Edwin M. Martin, Jr., as treasurer, violated 2 U.S.C. § 434(b)(3)(B) and 11 C.F.R. § 104.13.

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

5. Decided by a vote of 6-0 to find reason to believe the Human Rights Campaign Fund and Victor J. Basile, as treasurer, violated 2 U.S.C. § 434(b)(6)(B)(i).

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

6. Decided by a vote of 6-0 to find reason to believe the Studds Trust Fund violated 2 U.S.C. § 434 and § 434.

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

7. Decided by a vote of 6-0 to approve the letters attached to the General Counsel's report dated October 4, 1984.

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

Attest:

10-18-84
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: OCTOBER 10, 1984

SUBJECT: OBJECTIONS - MUR 1744 First General Counsel's Report signed October 4, 1984

The above-named document was circulated to the Commission on Friday, October 5, 1984 at 2:00.

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

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

This matter will be placed on the Executive Session agenda for Tuesday, October 16, 1984.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE, GENERAL COUNSEL

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

DATE: OCTOBER 9, 1984

SUBJECT: OBJECTIONS - MUR 1744 First General Counsel's Report signed October 4, 1984

The above-named document was circulated to the Commission on Friday, October 5, 1984 at 2:00.

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

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

This matter will be placed on the Executive Session agenda for Tuesday, October 16, 1984.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary

FROM: Office of General Counsel

DATE: October 5, 1984

SUBJECT: MUR 1744 - First General Counsel's Report

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

Open Session _____

Closed Session _____

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

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SENSITIVE

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

RECEIVED
OFFICE OF THE FEC
COMMISSION SECRETARY

84 OCT 5 A8:29

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION 10/5/84 -8:25

MUR # 1744
DATE COMPLAINT
RECEIVED BY OGC
7-24-84
DATE OF NOTIFICATION
TO RESPONDENTS
7-31-84
STAFF Maura White

COMPLAINANT'S NAME:	Peter Y. Flynn
RESPONDENTS' NAMES:	Committee to Re-Elect Congressman Studds; Edwin M. Martin, Jr., as treasurer; Human Rights Campaign Fund; Victor J. Basile, as treasurer, Studds Trust Fund
RELEVANT STATUTE:	2 U.S.C. §§ 434(b)(5)(A), 434(b)(3)(B), 441b(a)
INTERNAL REPORTS CHECKED:	Public Records
FEDERAL AGENCIES CHECKED:	None

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SUMMARY OF ALLEGATIONS

On July 24, 1984, Peter Y. Flynn filed a complaint with the Commission against the Committee to Re-Elect Congressman Studds ("Committee") and its treasurer, Edwin M. Martin, Jr., the Studds Trust Fund, and the Human Rights Campaign Fund and its treasurer, Victor J. Basile. The complaint alleges that the Committee and its treasurer violated 11 C.F.R. § 104.3 by "failing to fully disclose fundraising expenses directly attributable" to events which took place in San Francisco, California, during either late April or early May of 1984. In addition, the complainant alleges that the Studds' "Trust Fund" may be engaging in "fundraising efforts which should legally be governed by FEC statutes."

FACTUAL AND LEGAL ANALYSIS

(a) The facts

1. Fundraising Events

The complainant bases his belief that fundraising events for Congressman Studds occurred in California on a news article which appeared in the May 11, 1984, edition of the San Francisco Chronicle, and upon the complainant's review of the Committee's 1984 July Quarterly Report which disclosed "ten (10) itemized receipts listed in Schedule 'A' .... totalling $8,750."1/ The San Francisco Chronicle news article submitted by the complainant states that "Studds came to San Francisco recently for two fundraisers, his second fundraising appearance here this year." No other information concerning the fundraiser was reported in the San Francisco Chronicle. The complainant alleges that after his review of the Committee's 1984 July Quarterly Report he "can find no disbursement or in-kind contribution to any individual, organization or corporation for any fundraising activity in California" and, that "based upon recent problems with the Committee's fundraising ... there is reason to believe similar instances may have occurred."

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1/ As to the complaint's reference to the Committee's itemized receipts, this office assumes the complainant is alleging that such contributions stemmed from the fundraising events at issue. The complainant did not specifically identify the contributions of which he makes mention. This office's review of the Schedule A submitted by the complainant has revealed contributions from nine California residents totalling $7,750.

In citing "recent problems" with the Committee's fundraising, the complainant refers to an April 20, 1984, news article in the Patriot Ledger, a copy of which was included in the complaint. The Patriot Ledger reported that Representative Studds "will check with federal election officials before he accepts money from a fundraiser held on 'gay night' at the Boston nightclub Metro, a spokesman for the Congressman said yesterday." According to the Patriot Ledger, the spokesman, Peter Fleischer, "said the problem was that Metro may have advertised for the event in The Metro Sunday Times, a newsletter oriented toward the gay community." It was reported that "Fleisher said the campaign committee paid for the actual fund-raiser, which was held Sunday. He said $3 was charged at the door; $2 went to Studds and $1 paid for the use of the nightclub." Another news article submitted by the complainant from The Enterprise (April 19, 1984, edition) also referred to a "Studds fundraising event which was promoted in a Boston gay newsletter called the Metro Sunday Times." The Enterprise reported that "[a] signed letter from the publisher of the newsletter, George Tamsitt -- described as the promotion manager of the club -- noted that '...we will be hosting Gerry Studds and raising money for his re-election' April 15 at the club." According to The Enterprise, the "newsletter also featured, on the back cover, a display advertisement calling attention to the 'Gerry Studds Benefit,' which was 'Metro's declaration of support... show your support'." The Enterprise

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also stated that there "was no mention anywhere in the advertisement that it was paid for by anyone associated with the Studds campaign."2/

On August 17, 1984, the Committee submitted its response to the allegations contained in the instant complaint (Attachment 1). The Committee "emphatically denies that [it] or any of its employees have violated any of the federal election laws as alleged." The Committee maintains that "the campaign has fully disclosed all the expenditures for its California fundraising events, of which there were only two." According to the Committee's response, Representative Studds attended "two fundraisers organized by his campaign committee" which took place in Berkley and San Francisco, California during May of 1984. The Committee asserts that it "organized, paid for and reported the expenses associated with Representative Studds' trip and fundraising activities in accordance with the federal election laws." It is explained in the Committee's response that the Committee paid for Representative Studds' travel costs and "some of his dining expenses, by Mastercard" and that the expenditure is reported on Schedule B of the Committee's 1984 July Quarterly Report.3/ In addition, the Committee's response maintains that it

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2/ In contrast to the Patriot Ledger, The Enterprise reported Peter Fleisher as saying that the campaign did not pay any of the costs of running the fundraiser at Metro.

3/ The Committee's reply refers to disbursements to the Rockland Trust Company on May 15, 1984, of $418.80 for "Mastercard: dinner, travel" and on June 15, 1984, of $21 for "Mastercard: dinner," both of which were reported on its 1984 July Quarterly Report.

reported: a $200 consulting fee to David Bender who organized the fundraising events in California[4]; reimbursements to David Bender ($600) and Peter Fleischer ($1,361.38), who initially paid the costs of the fundraising events[5]; and, reimbursement to Representative Studds for travel expenses ($11).[6]

In response to the complaint's reference to "recent problems with the Committee's fundraising" and the inclusion in the complaint of two newspaper articles written about a fundraiser at the Metro club in Boston, the Committee contends that the "operation and promotion of this fundraiser was entirely proper." According to the Committee, Metro promoted and held a fundraiser for Rep. Studds on April 15, 1984, and "bore all the initial expenses." It is explained that "[a] total of $4,745 was collected and paid to the campaign committee, $4,511 by cashiers check and $234 in small anonymous contributions." Moreover, the Committee "then paid Metro a total of $2,229.50 for the promotion and holding of the function." The Committee's 1984 July Quarterly Report diclosed a disbursement of $2,229.50 on

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4/ Review of the Committee's 1984 July Quarterly Report has revealed that this disbursement to David Bender is reported on Schedule B. The date of the disbursement is May 10, 1984, and the purpose is described as "consulting."

5/ Review of the Committee's 1984 July Quarterly Report has revealed that the instant disbursements to David Bender and Peter Fleischer are in fact reported on Schedule B. The Committee's report discloses a $600 disbursement to David Bender on June 14, 1984, for "Reimb. exp.: food, beverage" and a $1,361.38 disbursement to Peter Fleischer on May 2, 1984, for "Reimb., printing, postage, paper supplies."

6/ The Committee's 1984 July Quarterly Report discloses a disbursement of $11 to Gerry E. Studds on May 2, 1984, for "Reimb. exp, travel."

April 24, 1984, to Entertainment, Inc. for "use of facilities, Promotional activities."7/

(b) Trust Fund

The complainant's second allegation concerns the "status of Congressman Studds' 'Trust Fund,' which was established obstensibly for the purpose of raising funds to pay for legal fees incurred as a result of his legal battle regarding his affair with a teenage House page." The complainant, in alleging that the Trust Fund may be engaging in election-related fundraising efforts, cites "a letter sent by the Human Rights Campaign Fund soliciting funds on behalf of Congressman Studds." It is the complainant's contention that "[i]n the four-paged letter there are four paragraphs which speak to the significance of the potential contribution to Studds' reelection prospects." The four paragraphs are not specifically identified, but the complainant states that he does "not believe that a 'defense fund soliciation letter' should state '.... it is important that Gerry Studds' be reelected'." The complainant maintains that members of the Human Rights Campaign Fund are "actively engaging in promoting the candidacy of Congressman Studds ... and as such, the organizational fundraising activities should be disclosed and regulated under FEC requirements."

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7/ The Committee also explains with respect to The Enterprise news article (see footnote 2 above) that "Mr. Fleischer's reference was to the upfront costs of the fundraiser" when he was quoted "as saying that the campaign did not pay any costs of running the fundraiser."

The letter at issue from Dan J. Bradley, the Co-Chair of the Human Rights Campaign Fund, states that a "group of supporters" established a Trust Fund to help defray over $40,000 in legal expenses resulting from a congressional investigation of Representative Studds' conduct. The letter solicits contributions to the Trust Fund and explains that the proceeds "will be used exclusively to re-pay these legal fees." The letter also states in pertinent part:

> By making such a contribution, you will do far more than help alleviate this debt. You will be telling Gerry Studds that you appreciate his decision to tell the truth about his sexuality, and his determination to insist that sexual preference is irrelevant to a person's performance in professional life.
>
> In addition, you will bolster the groundswell of sentiment within the Gay community -- a sentiment matched only by Studds' own Massachusetts constituents -- that he should run for re-election this fall ....
>
> ...
>
> I believe it is important that Gerry Studds be re-elected. He is a superb Congressman....
>
> A contribution to the Studds Trust Fund will have an important practical effect. It will tell Congressman Studds that he has the support he needs to make it through the year ahead....
>
> By making a contribution to the Studds Trust Fund, you can send Gerry Studds your vote of confidence, to encourage him to run in 1984. (Emphasis added.)

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In response to the complainant's allegation concerning the "Trust Fund," the Committee's August 17, 1984, response states that the "Commission has already considered the Studds' Trust and in Advisory Opinion 1983-21 has stated that the Trust is not subject to the Federal Election Campaign Act or to FEC regulations as long as it meets certain conditions." On September 20, 1983, the Commission issued Advisory Opinion 1983-21 to Representative Studds concerning the establishment of a legal defense fund to defray legal expenses resulting from an investigation by the House Committee on Standards of Official Conduct. The Commission concluded in the Advisory Opinion:

> ... to the extent the proposed trust fund is used exclusively for the purpose of paying the costs of your legal defense arising from Congressional or other proceedings not involving compliance or audit matters under the Act, donations to and disbursements from the Trust would not constitute contributions or expenditures under the Act.... Accordingly, neither the source nor the amount of donations to the Trust would be limited under the Act or Commission regulations. Nor would the Act or regulations require any reporting of receipts or payments of the Trust. In reaching this conclusion the Commission also assumes that none of the residual funds, upon dissolution of the Trust, will be distributed or transferred to your campaign committee or to any other political committee.

The Committee asserts that the "Studds' Trust has been established and operated in precisely the same manner as was considered and approved by the Commission in the Advisory Opinion" and that the "Trust is not a political committee." According to the Committee, the Trust "has always raised and

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spent funds exclusively to pay the legal fees incurred by Rep. Studds in connection with the House investigation, and to pay operating expenses of the Trust itself." It is the Committee's contention that the "Trust has not made any contributions to or expenditures on behalf of any candidate or political committee and is in the process of being dissolved after having accomplished its purpose."8/

With respect to the letter from Dan J. Bradley appended to the complaint, the Committee explains that "[a]ll the money raised by Mr. Bradley's letter was deposited in the Trust" and, therefore, "all of the money raised by Mr. Bradley's letter was used exclusively to pay legal fees, and is not subject to the requirements of the FECA." The position taken by the Committee is that the "letter is a straitforward request for contributions to the Studds' Trust," and that "[c]ontrary to the allegations in the complaint, the letter does not ask for contributions to Rep. Studds' campaign or for support for Rep. Studds in any election."

The Committee's response also addresses the "insinuations" made in the complaint that members of the Human Rights Campaign Fund are unlawfully promoting Rep. Studds' candidacy. The Committee maintains that "[a]lthough we are unaware of the extent of the Campaign Fund's support of Rep. Studds, the organization certainly has the right to support Rep. Studds if it chooses to do so." The Committee maintains that to its knowledge the Human

8/ "Detailed records of the Studds' Trust finances" were attached to the Committee's response.

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Rights Campaign Fund has complied with the federal election laws. The Committee emphasizes that "any support given by the [Human Rights Campaign] Fund and its members to Representative Studds' election campaign has been entirely independent of and unrelated to the establishment and operation of the Studds' Trust." According to the Committee, the Human Rights Campaign Fund's "contribution to the Studds' Trust was the mailing of the Bradley letter ... to persons on the Fund's mailing list," and the funds raised were used exclusively to pay legal bills. In addition, "[t]hose funds raised in excess of Congressman Studds' legal fees and nominal operating expenses of the Trust were returned to the Human Rights Campaign Fund to defray the costs of mailing the Bradley letter."9/ The Committee's response concludes by stating that the Human Rights Campaign Fund's "contribution to the Studds' Trust thus did not have the purpose or effect of influencing any federal election and therefore was not governed by the FECA."

The Human Rights Campaign Fund responded to the allegations in the complaint on August 30, 1984 (Attachment 2). The response explains that the letter at issue from Dan Bradley "explicitly stated that contributions sought by the letter were to be made to the Studds Trust Fund and that the proceeds were to be used

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9/ A summary of the Studds' Trust financial statement reports a reimbursement of $1,768 to the Human Rights Campaign Fund. According to records submitted by the Committee, the money was transferred on three dates: 5-2-84($1,000); 5-16-84($463); and, 6-11-84($305). The Human Rights Campaign Fund reported the receipt of $1,768 from the Studds Trust Fund on June 30, 1984, as "reimbursement for mailing and postage."

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exclusively to help repay Congressman Studds' legal fees for matters related to the House investigation." The response continues on to state that "[t]hese checks were then transmitted directly by the Human Rights Campaign Fund to the Studds Trust Fund." The response concludes that the checks were not contributions to be used for federal election election purposes, and, therefore, were "not subject to reporting by the Human Rights Campaign Fund to the Federal Election Commission." The Human Rights Campaign Fund further explains its "understanding that the Studds Trust Fund did, in fact, use these funds solely for purposes of defraying these legal bills and not for any election purposes."

(b) The applicable law

1. Fundraising events in California

Pursuant to 2 U.S.C. § 434(b)(5)(A) and 11 C.F.R. § 104.3(b)(4)(i), a political committee is required to disclose the name and address of each person to whom an expenditure in an aggregate amount or value in excess of $200 within the calendar year is made by the reporting committee to meet a candidate or committee operating expense, together with the date, amount, and purpose of such operating expenditure. The term "purpose" is defined at 11 C.F.R. § 104.3(b)(4)(i)(A) to mean a brief statement or description of why the disbursement was made.

With respect to the complainant's allegation that the Committee failed to disclose expenses attributable to fundraising events in California, it is the view of this office that there is

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reason to believe the Committee violated 2 U.S.C. § 434(b)(5)(A) and 11 C.F.R. § 104.3(b). Although the Committee contends that it reported all expenses related to the events, it appears that the Committee failed to properly itemize two related expenditures. Specifically, the expenditures at issue are those to Rockland Trust Company on May 15, 1984, ($418.80) and June 15, 1984, ($21) for "Mastercard: dinner, travel," and "Mastercard: dinner" respectively. Where expenditures are made using credit cards the Commission has required a committee to report, using a memo entry, the name of the ultimate payee, i.e. the entity which provided the goods or services.

10/ and in the Commission's Campaign Guide for Congressional Candidates and Committees.11/ In view of the Committee's failure to report the ultimate payee for two credit card transactions, it is the recommendation of this office that the Commission find reason to believe the Committee and Edwin Martin, as treasurer, violated 2 U.S.C. § 434(b)(5)(A) and 11 C.F.R. § 104.3(b).

2. Fundraising event in Boston

Pursuant to 2 U.S.C. § 441b(a), a corporation is prohibited from making a contribution or expenditure in connection with a federal election, and a political committee is prohibited from

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10/

11/ Page 35 of the Campaign Guide illustrates, using a memo entry detailing the ultimate payee, the correct reporting of expenditures involving credit card transactions.

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knowingly accepting or receiving any contribution prohibited by 2 U.S.C. § 441b(a).

The question which arises herein from the information reported in the Patriot Ledger and The Enterprise is whether Metro, a Boston nightclub at which the April 15, 1984, fundraiser for Representative Studds was conducted, made a "contribution" in connection with a federal election when it advertised the event in a "display ad" on the back cover of the Metro Sunday Times. Metro is an incorporated entity and, hence, prohibited from making contributions or expenditures in connection with a federal election.12/ As discussed above, the Committee was apparently aware of the ad in that its agent, Peter Fleisher, acknowledged to the Patriot Ledger that Metro may have advertised the event in the Metro Sunday Times. While the Committee's response to the instant complaint asserted that it paid for the fundraiser, including the promotional expenses, the Committee did not specifically address the payment of the ad which appeared in the Metro Sunday Times. Moreover, the advertisement itself apparently did not state who absorbed its cost. Indeed, the purported language in the display ad that the event constitutes "Metro's declaration of support ... show your support" suggests that the ad was paid for by Metro. It is this office's view

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12/ The Enterprise reported: "Metro is listed with the Secretary of State's office as a corporation known as '7-9 Landsdowne Corp' of 9 Landsdowne St. with Sasha Loew Black as the principal stockholder." In response to an inquiry from this office the Massachusetts Secretary of State's Corporate division confirmed that 7-9 Landsdowne Corporation is an incorporated entity.

that such language, in combination with the statement "Proceeds to benefit Studds' re-election to Congress," constitutes an expenditure in connection with a federal election and, hence, an in-kind contribution to Representative Studds. That the Committee may have eventually reimbursed Metro for the cost of the ad does not negate the fact that a prohibited in-kind contribution was made by Metro. Although it may be argued that an incorporated entity whose business involves promotional events must be allowed in its ordinary course to promote those events, it is the language of the instant advertisement which brings it outside the scope of permissibility, in this office's view. Hence, it is the recommendation of this office that the Commission find reason to believe Metro (7-9 Landsdowne Corp.) violated 2 U.S.C. § 441b(a) by making a contribution in connection with a federal election, and that the Committee and Edwin Martin, as treasurer, violated 2 U.S.C. § 441b(a) by accepting a prohibited contribution from Metro (7-9 Landsdowne Corp.).

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(b) Studds Trust Fund

As set forth at 2 U.S.C. § 431(8)(A)(i) the term "contribution" includes any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for federal office. The term "expenditure" is defined at 2 U.S.C. § 431(9)(B)(i) to include any purchase, payment, distribution, loan, advance, deposit, or

gift of money or anything of value, made by any person for the purpose of influencing any election for federal office. The term "anything of value" includes all in-kind contributions. 11 C.F.R. § 100.8(a)(1)(iv)(A).

The issue involved herein concerns the inclusion of certain language in a solicitation letter from the Human Rights Campaign Fund for contributions to the Studds Trust Fund. The Commission's conclusion in Advisory Opinion 1983-21 that donations to and disbursements from the Studds Trust Fund would not constitute contributions or expenditures under the Act was premised upon the exclusive use of the Studds Trust Fund for the payment of Representative Studds' legal defense expenses. The Advisory Opinion, however, did not specifically address the solicitation of contributions to the Studds Trust Fund.

Although the Committee presents the argument that the solicitation letter paid for by the Human Rights Campaign Fund "did not have the purpose of influencing any federal election," it is this office's view that the payment of the costs of the solicitation letter constituted an "expenditure" under the Act by the Human Rights Campaign Fund and, hence, an in-kind contribution to Representative Studds. Such a view reflects the fact that the solicitation letter, from the Co-Chair of the Human Rights Campaign Fund, states "I believe it is important that Gerry Studds be re-elected" and "By making a contribution to the Studds Trust Fund, you can send Gerry Studds your vote of

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confidence, to encourage him to run in 1984." To be sure, the above language which urges the letter's recipient to support Representative Studds through the election process, should be considered for the purpose of influencing a federal election. By including this language in the solicitation letter the Human Rights Campaign Fund has brought the costs of the letter within the purview of the Act and, accordingly, was required to report the expenditure as an in-kind contribution to the Committee pursuant to 2 U.S.C. § 434(b)(6)(B)(i).13/ In turn, the Committee was required to report the receipt of the in-kind contribution from the Human Rights Campaign Fund pursuant to 2 U.S.C. § 434(b)(3)(B) and 11 C.F.R. § 104.13. It is therefore, the recommendation of this office that the Commission find reason to believe the Human Rights Campaign Fund violated 2 U.S.C. § 434(b)(6)(B)(i), and that the Committee violated 2 U.S.C. § 434(b)(3)(B) and 11 C.F.R. § 104.13.

Information contained in the Committee's response to the complaint raises an additional issue with respect to the Studds Trust Fund. As discussed above, funds raised by the Studds Trust

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13/ The contribution limitations with respect to the cost of the solicitation letter do not appear to be at issue. The Human Rights Campaign Fund, as a qualified multicandidate committee, may contribute $5,000 per election to the Committee to Re-Elect Congressman Studds. 2 U.S.C. § 441a(a)(2)(A). Review of the Commission's "E" Index did not reveal any contributions to the Committee to Re-Elect Congressman Studds during 1983-1984 from the Human Rights Campaign Fund. It is assumed that the Human Rights Campaign Fund reported the actual disbursements for the costs of the solicitation letter. See also discussion below with respect to the cost of the solicitation letter.

Fund in excess of the legal fees "were returned to the Human Rights Campaign Fund to defray the costs of mailing the Bradley letter." Under the Act, a "group of persons" attains political committee status when it makes a "contribution" or "expenditure" in excess of $1,000 during a calendar year. 2 U.S.C. § 431(4). In consideration of this ramification the Commission specifically advised Representative Studds in Advisory Opinion 1983-21 that in reaching its conclusion that the Trust Fund could be established, the Commission assumed that "none of the residual funds, upon dissolution of the Trust, will be distributed or transferred to your campaign committee or any other political committee" (emphasis added).

It is clear that the Human Rights Campaign Fund is a political committee within the meaning of 2 U.S.C. § 431(4), and that the residual funds of the Studds Trust Fund were in fact transferred to the Human Rights Campaign Fund. In the view of this office the transfer of the funds has, in effect, triggered "political committee" status for the Studds Trust Fund, a "group of persons" under the Act, because the transfer to the political committee exceeded $1,000 in calendar year 1984.

Under the preceding analysis the Human Rights Campaign Fund's solicitation letter constitutes an "expenditure" in that it was, in part, for the purpose of influencing a federal election. While it may be true that the amount transferred by the Studds Trust Fund constituted a simple reimbursement of the Human Rights Campaign Fund's solicitation expenses, the transfer

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also constituted reimbursement of an "expenditure" under the Act. Thus, monies donated to the Studds Trust Fund to defray legal expenses related to a congressional probe were in effect used, although after the fact, to finance a solicitation letter which was in part for the purpose of influencing a federal election. In consideration of the foregoing, it is the recommendation of this office that the Commission find reason to believe the Studds Trust Fund violated 2 U.S.C. §§ 433 and 434 by failing to register and report as a political committee.

III. Recommendations

1. Find reason to believe the Committee to Re-Elect Congressman Studds and Edwin M. Martin, Jr., as treasurer, violated 2 U.S.C. § 434(b)(5)(A) and 11 C.F.R. § 104.3(b).

2. Find reason to believe the Committee to Re-Elect Congressman Studds and Edwin M. Martin, Jr., as treasurer, violated 2 U.S.C. § 441b(a).

3. Find reason to believe Metro (7-9 Landsdowne Corp.) violated 2 U.S.C. § 441b(a).

4. Find reason to believe the Committee to Re-Elect Congressman Studds and Edwin M. Martin, Jr., as treasurer, violated 2 U.S.C. § 434(b)(3)(B) and 11 C.F.R. § 104.13.

5. Find reason to believe the Human Rights Campaign Fund and Victor J. Basile, as treasurer, violated 2 U.S.C. § 434(b)(6)(B)(i).

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6. Find reason to believe the Studds Trust Fund violated 2 U.S.C. § 433 and 434.

7. Approve the attached letters.

Charles N. Steele
General Counsel

October 9, 1984

By: Kenneth A. Gross
Associate General Counsel

Attachments
1- Committee response
2- HRCF response
3- Proposed letters (3)

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Studds for Congress

RECEIVED AT THE FEC
HAND DELIVERED
84 AUG 17 P 3:18

August 15, 1984

GCC
#4370

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

RE: MUR 1744

Dear Mr. Gross:

This is in answer to your letter of July 31, 1984, received on August 2, 1984. By this letter, the Committee to Re-elect Congressman Studds emphatically denies that the Committee or any of its employees have violated any of the federal election laws as alleged in the complaint of Congressman Studds' opponent for re-election, Peter Y. Flynn. We answer each of the charges in that complaint in turn.

The Flynn complaint's first allegation is that the Committee failed to disclose expenditures by the Committee for "as many as three" fund-raising events in California. In fact, the campaign has fully disclosed all the expenditures for its California fundraising events, of which there were only two. Representative Studds visited California on May 4 through May 7, 1984. He flew to Los Angeles where he spoke on Central America and attended several political functions, none of which involved fundraising. Representative Studds then flew to the San Francisco area where he attended two fundraisers organized by his campaign committee (referred to by the newspaper article in Appendix A of the Flynn complaint). The fundraisers took place in Berkeley and in San Francisco. Representative Studds then flew back to the East Coast.

The Committee organized, paid for and reported the expenses associated with Representative Studds' trip and fundraising activities in accordance with the federal election laws; in fact, our office twice called the Commission to verify that we were using proper procedures. The Committee paid for Representative Studds' travel costs, and for some of his dining expenses, by Mastercard. That expenditure is reported in Schedule B (Disbursements), page 4, lines B and C. The Committee hired an agent, David Bender, to organize the fundraising events in California. His consulting fee is listed in Schedule B, page 9, line B. Mr. Bender and Peter Fleischer, the Committee's campaign manager, paid the costs of the fundraising events and were reimbursed by the campaign. Committee members twice called the Commission to determine that this procedure was proper; in both cases, staff members of the Commission assured them that it was. The

South Shore headquarters: Standish Village Plaza (Rt. 139), Pembroke, MA 02359 (617) 826-7561
Greater New Bedford headquarters: 1114 Acushnet Avenue, New Bedford, MA 02746 (617) 997-1541
Cape and Islands headquarters: 73B Center Street, Hyannis, MA 02601 (617) 771-6084

Authorized by the Studds for Congress Committee.

Attachment 1(1)

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reimbursements to Mr. Bender and Mr. Fleischer are reported respectively in Schedule B, page 9, line C, and Schedule B, page 12, line E. The Committee also reimbursed Rep. Studds for money he paid for travel expenses, as shown in Schedule B, page 9, line G.

The following list summarizes the above expenses and where they were reported in Rep. Studds' Disclosure Statement:*

SCHEDULE B - DISBURSEMENTS

Page	Line	Date	Amount	Purpose
4	B	5-15-84	418.80	Mastercard: dinner, travel (359.50 for airfare to West Coast)
4	C	6-15-84	21.00	Mastercard: dinner (minimum Mastercard payment)
9	B	5-10-84	200.00	David Bender for consulting
9	C	5-21-84	600.00	David Bender: reimbursement for food & beverage expenses
9	G	5-21-84	11.00	Gerry Studds: reimbursement for travel expenses
12	E	5-02-84	1,361.38	Peter Fleischer: reimbursement for printing, postage, and paper supplies

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The above discussion fully disposes of the first charge in the Flynn complaint. The Committee has fully complied with the federal election laws by providing detailed disclosure of all of its expenses, including those associated with the California trip and with its fundraising activities. We would be happy to provide you with the receipts of those expenditures if you so desire.

The Flynn complaint's second charge against the Committee is unclear. The complaint asks the Commission to examine the "status" of the Studds' Trust, a trust fund established to raise money to pay legal fees resulting from a House investigation of Rep. Studds. It alleges that the Studds' Trust has engaged "in fundraising efforts which should be legally governed by the FEC statutues." However, the Commission has already considered the Studds' Trust and in Advisory Opinion 1983-21 has stated that the Trust is not subject to the Federal Election Campaign Act or to FEC regulations as long as it meets certain conditions. According to the Advisory Opinion,

> The Commission concludes that to the extent the proposed trust fund is used exclusively for the purpose of paying the costs of Rep. Studds legal defense arising from Congressional or other proceedings not involving compliance or audit matters under the Act, donations to and disbursements from the Trust would not constitute

*The Committee's complete report for this period was attached to to the Flynn complaint as Appendix C.

> contributions or expenditures under the Act... Accordingly, neither the source nor the amount of donations to the Trust would be limited under the Act or Commission regulations. Nor would the Act or regulations require any reporting of receipts or payments of the Trust. In reaching this conclusion the Commission also assumes that none of the residual funds, upon dissolution of the Trust, will be distributed or transferred to your campaign committee or to any other political committee.

The Studds' Trust has been established and operated in precisely the same manner as was considered and approved by the Commission in the Adivsory Opinion. The Trust is not a political committee. It has always raised and spent funds exclusively to pay the legal fees incurred by Rep. Studds in connection with the House investigation, and to pay operating expenses of the Trust itself. The Trust has not made any contributions to or expenditures on behalf of any candidate or political committee and is in the process of being dissolved after having accomplished its purpose. We have included detailed records of the Studds' Trust finances as Attachment 1 to this letter.

These facts demonstrate that the Studds' Trust is not subject to the registration, reporting, contribution, or expenditure provisions of the Federal Election Campaign Act (FECA) and the FEC's regulations. Nevertheless, the Flynn complaint cites a letter from Dan J. Bradley of the Human Rights Campaign Fund to potential contributors to the Studds' Trust as evidence that the Studds' Trust has engaged in political fundraising governed by the FECA. As discussed earlier, the Trust has been used exclusively to pay Rep. Studds' legal bills in connection with a House investigation. All the money raised by Mr. Bradley's letter was deposited in the Trust. Therefore, all of the money raised by Mr. Bradley's letter was used exclusively to pay legal fees, and is not subject to the requirements of the FECA.

We also note that the letter is a straightforward request for contributions to the Studds' Trust in order to defray Rep. Studds' legal expenses. Contrary to the allegations in the complaint, the letter does not ask for contributions to Rep. Studds' campaign or for support for Rep. Studds in any election.

The above discussion demonstrates that the charges made in the Flynn complaint against the Committee and its employees are groundless. Contrary to the allegations in the complaint, the Committee has fully disclosed all expenses, including those associated with two California fundraisers. The complaint is also incorrect in claiming that the Studds' Trust, a fund used exclusively to pay legal bills for a House investigation of Rep. Studds, is subject to the restrictions of FECA.

Although this concludes our answers to the formal charges made in the Flynn complaint, the complaint also makes two insinuations of unlawful conduct which we would like to address. First, it claims

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that members of the Human Rights Campaign Fund are promoting Rep. Studds' candidacy, and implies that such promotion is unlawful. Although we are unaware of the extent of the Campaign Fund's support of Rep. Studds, the organization certainly has the right to support Rep. Studds if it chooses to do so. It is registered with the FEC as a political committee, and we welcome its support as long as it complies with the federal election laws. To our knowledge, it has complied with those laws.

Most important in these proceedings is the fact that any support given by the Fund and its members to Representative Studds' election campaign has been entirely independent of and unrelated to the establishment and operations of the Studds' Trust. The Fund's contribution to the Studds' Trust was the mailing of the Bradley letter (Appendix E of the Flynn complaint) to persons on the Fund's mailing list. The purpose of the letter was to raise money for the Studds' Trust to pay Rep. Studds' legal bills and the funds subsequently raised were used exclusively for that purpose. Those funds raised in excess of Congressman Studds' legal fees and nominal operating expenses of the Trust were returned to the Human Rights Campaign Fund to defray the costs of mailing the Bradley letter. The Fund's contribution to the Studds' Trust thus did not have the purpose or effect of influencing any federal election and therefore was not governed by the FECA.

Finally, the Flynn complaint implies that "recent problems with the Committee's fundraising" have resulted in violations of the federal election laws, and it refers to newspaper articles written about a fundraiser at the Metro Club in Boston. The operation and reporting of this fundraiser were entirely proper. Metro promoted and held a fundraiser for Rep. Studds on April 15,1984. Metro bore all the initial expenses. A total of $4,745.00 was collected and paid to the campaign committee, $4,511.00 by cashiers check and $234.00 in small anonymous contributions. The Committee then paid Metro a total of $2,229.50 for the promotion and holding of the function. This disbursement is listed on Schedule B, page 2, line I, to Entertainment, Inc.*

This concludes our response to the complaint of Peter Y. Flynn in MUR 1744. We would be happy to provide you with additional records and documentation if you so desire. Please let us know if you need any additional information.

Sincerely,

Mary Lou Butler

Mary Lou Butler
Finance Manager

Enclosures

*We note that the newspaper article included in Appendix D, of the complaint, "Studds Fundraisers May Have Violated Federal Election Law," Brockton Enterprise, April 19, 1984, quoted Peter Fleischer as saying that the campaign did not pay any costs of running the fundraiser. Mr. Fleischer's reference was to the upfront costs of the fundraiser.

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STUDDS' TRUST FINANCIAL SUMMARY

CONTRIBUTIONS

Generated by Bradley Letter	23,129.13
Other	19,870.00
Total contributions	42,999.13*
Interest	311.19
	43,310.32

(see bank statements attached)

EXPENDITURES

Legal fees	40,309.52
Reimbursement to Human Rights Campaign Fund	1,768.00
Other operating expenses	1,156.92
Total expenses	43,234.44

(see bank statements and copies of cancelled checks attached)

BALANCE IN ACCOUNT

75.88

*This figure includes one $20.00 deposit made on 7/26/84 for which the bank statement has not been received.

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DAN J. BRADLEY
PO BOX 1396
WASHINGTON, D C 20013

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Dear Friend,

On July 14, U.S. Congressman Gerry Studds (D-MA) walked to the lectern on the floor of the House of Representatives and delivered in strong, confident tones a statement unlike any previously made in our national legislature:

> "All Members of Congress," said Studds, "must cope with the challenge of initiating and maintaining a career in public office without destroying entirely the ability to lead a meaningful and emotionally fulfilling private life. It is not a simple task for any of us to meet adequately the obligations of either public or private life, let alone both. But these challenges are made substantially more complex when one is, as am I, both an elected public official and gay."

With those words, Congressman Studds became the first member of Congress to publicly affirm his homosexuality.

Studds' historic statement came during the course of his response to charges made by the House Committee on Standards of Official Conduct that he had engaged in an improper sexual relationship with a 17-year-old male page in 1973, during his first term in office.

Studds was not the first public official to have difficulties related to homosexual activity, but he was the first not to hide from his own identity; the first not to cite "alcoholism," "drug problems," "psychological pressures," or even "homosexual tendencies" as an excuse. Gerry Studds just admitted to an error in judgement, and stated without shame or sorrow that he is gay.

In so doing, Studds set a standard for courage and dignity that will make it far easier for others to be open about being gay. His speech on the floor prompted thousands of letters congratulating him for his decision, and expressing gratitude for the strength and eloquence of his words. Let me quote from three of those letters:

> "I saw, heard and re-read many times your speech to the House. I was dumbstruck, and moved to tears by your courage, pride, honesty, poise and resoluteness. If I ever, myself, rise even half so well to half so trying a moment, I think I shall consider my life, to that moment, a success and my dues -- such as any might reckon them -- fully paid. At last, a Congressman I can look up to, who represents me!" -- From New York

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"When I heard your statement to Congress on NPR recently, I lofted my sheetrock hammer across the room and cheered. A Congressman comes out with class! -- sure, measured voice, no half-baked apologies, "gay" rather than "homosexual." You have my deep respect for transforming what must be a lonely, traumatic event into a noble moment for us all...you have done a fine and brave thing for all of us." -- From North Carolina

"I was proud of you today when I saw you standing before the House making your precise, fine-tuned statement. I was proud of the way you looked, proud of what you said, proud of the way you said it. You affirmed my/our complex presence in this world. I am sorry that such an affirmation is contingent on what is clearly a painful and embarassing time for you and those you love. Thank you for not running away. Thank you for your courageous, public, personal response...There are millions of gay people, who are prouder of themselves because of the way you have chosen to publicly respond to the realities of your life." -- From Oregon

Gerry Studds' decision to be honest and open about himself was, he says, personally the best thing he has ever done. He feels great.

But, not everyone understands. It is likely that the refusal by Congressman Studds to be more visibly contrite about his past mistake, and about his sexual preference, in general, contributed to the decision by the House of Representatives to vote to censure him on the House floor. It is likely, as well, that the investigation concerning Studds which was made by the House Committee on Standards of Official Conduct, was far more extensive and exhaustive than it would have been if a heterosexual relationship had been involved. Consider, for example, that the Committee began investigating charges concerning misbehavior by Members of Congress in 1981 and 1982. How much time and how much work did it take to inquire all the way back to 1973 to expose a relationship which was, even according to the Committee, without coercion, which did not involve any preferential treatment, express or implied, which did not include any harassment of any kind, and which involved a young man who was for legal purposes, an adult?

During the course of its investigation, the Committee spent hundreds of thousands of dollars and interviewed hundreds of people, inquiring into virtually every phase of Congressman Studds' personal life for the past ten years. At the start, Studds refused to hire a lawyer. But ultimately, as the investigation went on, and friends and staff members were subjected to repeated interrogation, he relented. The legal bills ultimately exceeded $40,000, money Studds does not have.

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Recently, a group of supporters from Congressman Studds' district in Massachusetts, from Washington, and elsewhere around the country, established a Trust Fund to help defray these legal expenses. About one-half the money has already been raised. I would like to ask you to join in making a contribution to this Trust, the proceeds from which will be used exclusively to re-pay these legal fees.

By making such a contribution, you will do far more than help alleviate this debt. You will be telling Gerry Studds that you appreciate his decision to tell the truth about his sexuality, and his determination to insist that sexual preference is irrelevant to a person's performance in professional life.

In addition, you will bolster the groundswell of sentiment within the Gay Community -- a sentiment matched only by Studds' own Massachusetts constituents -- that he should run for re-election this fall. That decision will be, for him, an enormously difficult and intensely personal choice. A political campaign is always arduous under any circumstances, but in 1984, for Gerry Studds, it promises to be brutal indeed.

I know Gerry Studds, and I have followed with interest his career in Congress. During his 12 years in office, he has gained a reputation for hard work, accessibility, personal honesty, and intense dedication to the vital economic and environmental concerns of his district encompassing the southeastern Massachusetts coast. Above all, Congressman Studds has displayed throughout his career the kind of eloquence and wit so rarely found in politics today; an eloquence which has made him one of our most persuasive defenders of human rights and civil liberties both within the United States and in international affairs; and which -- as evidenced by his speech last July 14 -- grants him the ability to communicate his ideas with a unique and commanding strength.

Congressman Studds' constituents agree. After barely winning election for the first time in 1972, he has steadily increased his margin of victory. In 1982, he received 68 percent of the vote, and carried every town and precinct in his district.

But 1984 promises to be very different and a far more difficult kind of campaign. Several local politicians have announced their intention to campaign for Studds' seat, and he has been targeted by right-wing organizations as a prime candidate for defeat.

I believe it is important that Gerry Studds be re-elected. He is a superb Congressman. Our country needs many more with his talent and dedication. Simply by doing his job the way he has in the past, Studds will be serving his constituents, and making it easier every day for all of us to argue openly that sexual preference is no bar to competence, effectiveness or public respect.

A contribution to the Studds Trust Fund will have an important practical effect. It will tell Congressman Studds that he has the

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support he needs to make it through the year ahead. It will let him know that we deeply admire and respect the way he handled himself during the investigation and House vote. He has given thousands of gay men and lesbians who have faced similar allegations and inquiries into their personal lives reason to be proud.

By making a contribution to the Studds Trust Fund, you can send Gerry Studds your vote of confidence, to encourage him to run in 1984. You can send a message of friendship and support to a hard-working congressman who deserves the very best. Please make your check payable to the Studds Trust Fund and send it to my attention, c/o Dan J. Bradley, Co-Chair, Human Rights Campaign Fund, P.O. Box 1396, Washington, D.C. 20013.

Thank you for your continued support of the Human Rights Campaign Fund.

Sincerely,

Dan J Bradley

Dan J. Bradley
Co-Chair
Human Rights Campaign Fund

P.S. Congressman Gerry Studds is a co-sponsor of the federal gay civil rights legislation. He has spoken out frequently on issues of concern to gay men and lesbians.

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DAN J. BRADLEY

[redacted]

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I want Congressman Studds to know how much I admire and respect the stand he took in Congress. Enclosed is my check of:

☐ $25 ☐ $50 ☐ $75 ☐ $100 ☐ Other _____

Keep up the good work!

Make check payable to:
Studds Trust Fund.
Send it with this form to
c/o Dan J. Bradley, P.O. Box 1396,
Washington, D.C. 20013.

Check one, to charge your remittance:

☐ MasterCard ☐ Visa

_____
Your credit card number (All digits, please)

Mo. _____ Yr. _____

Credit Card valid thru

_____
(Your Signature)

NO POSTAGE NECESSARY IF MAILED IN THE UNITED STATES

BUSINESS REPLY MAIL
FIRST CLASS PERMIT NO. 12998 WASHINGTON, D.C.

POSTAGE WILL BE PAID BY:

DAN J. BRADLEY
c/o HRCF
P.O. Box 1396
Washington, D.C. 20013

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2504

STUDD'S TRUST NO. 102

Sept 29 19 83 53-150/113

PAY TO THE ORDER OF Mabry, Hunter & Goldings $10,000.00

Ten Thousand DOLLARS 00/100 CENTS

Shawmut First County Bank, N.A. Brockton, Massachusetts 02403

LIQUID INVESTMENT ACCOUNT

MEMO legal fees Mary Lou Butler

:011301507: 104130599 0102 000010000000

STUDD'S TRUST NO. 103

Sept 29 19 83 53-150/113

PAY TO THE ORDER OF George C. Studds $765.30

One Hundred sixty-five DOLLARS 30/100 CENTS

Shawmut First County Bank, N.A. Brockton, Massachusetts 02403

LIQUID INVESTMENT ACCOUNT

MEMO printing exp. phone, food Mary Lou Butler

:011301507: 104130599 0103 000000016530

STUDD'S TRUST NO. 104

Oct. 6 19 83 53-150/113

PAY TO THE ORDER OF Robert A. Buckley $238.45

Two Hundred thirty-eight DOLLARS 45/100 CENTS

Shawmut First County Bank, N.A. Brockton, Massachusetts 02403

LIQUID INVESTMENT ACCOUNT

MEMO r.e. office equip. phone, postage Mary Lou Butler

:011301507: 104130599 0104 000002384500

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STUDD'S TRUST NO. 105

Nov. 3 19 83 53-150/113

PAY TO THE ORDER OF Robert Nickerson $ 167.40

One Hundred and Sixty-seven DOLLARS 40/100 CENTS

Shawmut
First County Bank, N.A.
Brockton, Massachusetts 02403

LIQUID INVESTMENT ACCOUNT

MEMO

Mary Lou Butler

:011301507: 11 04130 59 6 11 0105 "000016740"

STUDD'S TRUST NO. 106

Nov. 3 19 83 53-150/113

PAY TO THE ORDER OF Scott Lejuez, Inc. $ 130.59

One Hundred and thirty —— DOLLARS 59/100 CENTS

Shawmut
First County Bank, N.A.
Brockton, Massachusetts 02403

LIQUID INVESTMENT ACCOUNT

MEMO

Mary Lou Butler

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STUDD'S TRUST NO. 107

12-21-83 05 000 [illegible] 10510

53-150/113

PAY TO THE ORDER OF Mary Lou Butler $ 196.35

One Hundred ninety six 35/100 DOLLARS CENTS

Shawmut
First County Bank, N.A.
Brockton, Massachusetts 02403

LIQUID INVESTMENT ACCOUNT

Mary Lou Butler

MEMO

:011301507: 104113059 6 0107 "00000196 35"

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STUDD'S TRUST NO. 108

2 12-23-83 07 04200 748 25110022 2

Dec 12 1983

53-150/113

PAY TO THE ORDER OF Mahoney, Hawkes & Goldings $ 8,000.00

Eight Thousand DOLLARS 00/100 CENTS

Shawmut
First County Bank, N.A.
Brockton, Massachusetts 02403

LIQUID INVESTMENT ACCOUNT

Mary Lou Butler

MEMO legal fees

:011301507: 104113059 6 0108 "0000800000"

1504 77.50 Deds.
1327.02

STUDD'S TRUST NO. 110

2 03-07-84 07 [illegible] 298 25973 1404

Feb 29 1984

53-150/113

PAY TO THE ORDER OF Mahoney, Hawkes & Goldings $ 12,309.52

Twelve Thousand, three Hundred & Nine DOLLARS 52/100 CENTS

Shawmut
First County Bank, N.A.
Brockton, Massachusetts 02403

LIQUID INVESTMENT ACCOUNT

Mary Lou Butler

MEMO

:011301507: 104113059 6 0110 "0001230952"

8504054683

1(14)

STUDD'S TRUST NO. 111

March 6 19 84 63-150/113

PAY TO THE ORDER OF Mahoney Hawkes & Golding $ 7,000.00

Seven Thousand 00/100 DOLLARS CENTS

Shawmut
First County Bank, N.A.
Brockton, Massachusetts 02403

LIQUID INVESTMENT ACCOUNT

MEMO

Mary Lou Butler

:011301507: 104113059 6" 0111 "0000700000"

STUDD'S TRUST NO. 113

April 2 19 84 63-150/113

PAY TO THE ORDER OF Mahoney, Hawkes & Golding $ 3,111.00

Three Thousand 00/100 DOLLARS 00 CENTS

Shawmut
First County Bank, N.A.
Brockton, Massachusetts 02403

LIQUID INVESTMENT ACCOUNT

MEMO

Mary Lou Butler

:011301507: 104113059 6" 0113 "0000300000"

8504054683

1(15)

CASHIER'S CHECK

Shawmut
First County Bank, N.A.
Main Street Brockton, Massachusetts 02403

CUSTOMER COPY

010491

Date 5-2-1984

PAY TO THE ORDER OF Human Rights Campaign Fund********** $ 1,000.00

NON-NEGOTIABLE

AUTHORIZED SIGNATURE

STUDD'S TRUST 118

May 16 84 53-150/113,

PAY TO THE ORDER OF Human Rights Campaign Fund 463.00

Four Hundred and Sixty six DOLLARS 00/00 CENTS

Shawmut
First County Bank, N.A.
Brockton, Massachusetts 02403

LIQUID INVESTMENT ACCOUNT

MEMO

Mary Lou Battles

:011301507: "1041305 9 6" 0118 "0000046300"

8504054635

COMIC 4REIM LO 1001654

STUDD'S TRUST 119

June 16 84 53-150/113,

PAY TO THE ORDER OF Human Rights Campaign Fund 305.00

Three Hundred and five DOLLARS 00/00 CENTS

Shawmut
First County Bank, N.A.
Brockton, Massachusetts 02403

LIQUID INVESTMENT ACCOUNT

MEMO

Mary Lou Battles

:011301507: "1041305 9 6" 0119 "0000030500"

1(16)

STUDD'S TRUST

114

Copies 2 ea 53-150/113,

Heat Discharger 76.60

Seventy-six and ——— Sixty

Shawmut
First County Bank, N.A.
Brockton, Massachusetts 02403

LIQUID INVESTMENT ACCOUNT

thank you cards Mary Fre Butler

⑆011301507⑆ ⑈104130596⑈ 0114 "0000007660"

8504055446836

1(17)

8504054446837

STUDD'S TRUST

4097202001 58 112

March 28 84 53-150/113,

PAY TO THE ORDER OF Commonwealth of Massachusetts $ 14.31

Fourteen ——— DOLLARS 31/100 CENTS

Shawmut First County Bank, N.A.
Brockton, Massachusetts 02403

LIQUID INVESTMENT ACCOUNT

MEMO

Tracy Lou Butler

⑆011301507⑆ ⑈104130596⑈ 0112 ⑈0000014331⑈

STUDD'S TRUST

NO 115

April 9 84 53-150/113,

PAY TO THE ORDER OF Postmaster $ 130.00

One-hundred and Thirty ——— DOLLARS None CENTS

Shawmut First County Bank, N.A.
Brockton, Massachusetts 02403

LIQUID INVESTMENT ACCOUNT

MEMO

Tracy Lou Butler

⑆011301507⑆ ⑈104130596⑈ 0115 ⑈0000013000⑈

1(18)

STUDD'S TRUST

NO 109

Jan 11 19 84

53-150/113

PAY TO THE ORDER OF Postmaster - Norwell $ 26 80

Twenty-six DOLLARS 80/100 CENTS

Shawmut
First County Bank, N.A.
Brockton, Massachusetts 02403

LIQUID INVESTMENT ACCOUNT

MEMO 13 + stamps

Mary Lee Studd

:011301507: 1041305 9 0109 "0000002680"

STUDD'S TRUST

NO 116

April 17 19 84

53-150/113

PAY TO THE ORDER OF Stephanie Tormey $ 7.80

Seven DOLLARS 80/100 CENTS

Shawmut
First County Bank, N.A.
Brockton, Massachusetts 02403

LIQUID INVESTMENT ACCOUNT

MEMO N.L - stamps

Mary Lee Studd

:011301507: 1041305 9 0116 "0000000780"

8504054468

1(19)

Internal Revenue Service

Date of This Notice

08242683

If you inquire about your account, please refer to this number or attach a copy of this notice ▶

10-13-83

Employer Identification Number

04-6495262

GERRY E STUDDS LEGAL SERVICES TRUST
STUDDS TRUST
MARY LOU BUTLER TR
3B ROSAS LA
SCITUATE MA 02066

575 B 555555155
55555555

NOTICE OF NEW EMPLOYER IDENTIFICATION NUMBER ASSIGNED

Thank you for your application for an employer identification number. The number above has been assigned to you. We will use it to identify your business tax returns and any other related documents, even if you have no employees.

Please keep this number in your permanent records. Use the number and your name, exactly as shown above, on all Federal tax forms that require this information, and refer to the number in all tax payments and in tax-related correspondence or documents. You may wish to make a record of the number for reference in case this notice is lost or destroyed.

Note that the assignment of this number does not grant tax-exempt status to nonprofit organizations. For details on how to apply for this exemption, see IRS Publication 557, Tax-Exempt Status for Your Organization, available at most IRS offices.

We appreciate your cooperation.

U.S. GOVERNMENT PRINTING OFFICE: 1982-361-078/7532 E.I. NO. 20-2755441

Form 5372 (Rev. 11-81)

1(20)

Shawmut
First County Bank, N.A.
90 Main St., Brockton, MA 02403

STATEMENT OF ACCOUNT

ACCOUNT NUMBER
13-059-6

NO. OF ITEMS
3

STUDDS TRUST
38 ROSA'S LANE
SCITUATE MA 02066

STATEMENT DATE
10/18/83

CYCLE DAYS

DATE OF LAST STATEMENT
09/16

SUMMARY OF NEW BALANCES | **NOW AND SAVINGS INTEREST SUMMARY**

CHECKING NOW	SUPERCHECK	SAVINGS	PAID TO DATE THIS YEAR	TAXPAYER ID NUMBER
5,724.98			93.73	046-49-5202

SUPERCHECK SUMMARY

AVERAGE DAILY BALANCE	DAILY PERIODIC RATE	FINANCE CHARGE	ANNUAL PERCENTAGE RATE	AVAILABLE CREDIT	PAYMENT AMOUNT AND DATE DUE

CHECKS PAID OR DEBITS	DEPOSITS OR PAYMENTS	POSTING DATE	BALANCES
LIQUID INVESTMENT ACCOUNT 13-059-6	PREVIOUS BALANCE		14,520.00
	225.00 ✓	09/19	14,745.00
	17.53IN	09/19	14,762.53
THE ANNUAL INTEREST RATE IS 06.1000% AS OF 09/19/83			
	100.00	09/22	14,862.53
	235.00 ✓	09/22	15,097.53
	165.00 ✓	09/23	15,262.53
	275.00 ✓	09/26	15,537.53
	23.36IN	09/26	15,560.94
THE ANNUAL INTEREST RATE IS 06.2000% AS OF 09/26/83			
THE ANNUAL INTEREST RATE IS 06.2500% AS OF 09/27/83			
	160.00 ✓	09/29	15,720.94
	185.00 ✓	09/29	15,905.94
	175.00 ✓	09/30	16,080.94
	25.10IN	10/03	16,106.04
THE ANNUAL INTEREST RATE IS 06.2500% AS OF 10/03/83			
	195.00 ✓	10/04	16,301.04
THE ANNUAL INTEREST RATE IS 06.1500% AS OF 10/04/83			
	85.00 ✓	10/05	16,386.04
10,000.00 ✓		10/06	6,386.04
	265.00 ✓	10/07	6,651.04
	1,690.00 ✓	10/07	8,341.04
	14.51IN	10/07	8,355.55
THE ANNUAL INTEREST RATE IS 06.1500% AS OF 10/07/83			
238.45 ✓		10/11	8,317.10
THE ANNUAL INTEREST RATE IS 06.1000% AS OF 10/11/83			
	260.00 ✓	10/14	8,577.10
	300.00 ✓	10/17	8,877.10
165.30 ✓		10/17	8,711.80
	13.18IN	10/17	8,724.98
THE ANNUAL INTEREST RATE IS 06.1000% AS OF 10/17/83			

WEEKLY RATE CHANGE
THE ANNUAL INTEREST RATE IS 5.25% WHILE YOUR BALANCE REMAINS BELOW $ 2,500.00

NOTICE: SEE REVERSE SIDE AND ACCOMPANYING STATEMENT(S) FOR IMPORTANT INFORMATION
SEE ACCOMPANYING NOTICES FOR ADDITIONAL DETAILS ABOUT CERTAIN ELECTRONIC TRANSFERS TO OR FROM YOUR ACCOUNT(S)

1(21)

Shawmut
First County Bank, N.A.
90 Main St., Brockton, MA 02403

STATEMENT OF ACCOUNT

STUDDS TRUST
38 ROSA'S LANE
SCITUATE MA 02066

STATEMENT DATE 09/16/83
CYCLE DAYS

DATE OF LAST STATEMENT

CREDITS SINCE	SUPERCHECK	SAVINGS	PAID TO DATE THIS YEAR	TAXPAYER ID NUMBER
14,520.00			.00	

AVERAGE DAILY BALANCE	DAILY PERIODIC RATE	FINANCE CHARGE	ANNUAL PERCENTAGE RATE	AVAILABLE CREDIT	PAYMENT AMOUNT AND DATE DUE

CHECKS PAID OR DEBITS	DEPOSITS OR PAYMENTS	POSTING DATE	BALANCES
LIQUID INVESTMENT ACCOUNT 10-413-059-6			
		PREVIOUS BALANCE	.00
	1,960.00	09/14	1,960.00
	12,560.00	09/14	14,520.00
THE ANNUAL INTEREST RATE IS 08.1000% AS OF 09/14/83			
WEEKLY RATE CHANGE THE ANNUAL INTEREST RATE IS 5.25% WHILE YOUR BALANCE REMAINS BELOW $ 2,500.00			

8504054469 1

NOTICE: SEE REVERSE SIDE AND ACCOMPANYING STATEMENT(S) FOR IMPORTANT INFORMATION.
SEE ACCOMPANYING NOTICES FOR ADDITIONAL DETAILS ABOUT CERTAIN ELECTRONIC TRANSFERS TO OR FROM YOUR ACCOUNT(S).

1(22)

Shawmut
First County Bank, N.A.
90 Main St., Brockton, MA 02403

STATEMENT OF ACCOUNT

STUDDS TRUST
38 RUSA'S LANE
SCITUATE MA 02066

STATEMENT DATE 11/16/83
CYCLE DAYS

DATE OF LAST STATEMENT 10/18

SUMMARY OF NEW BALANCES		NOW AND SAVINGS INTEREST SUMMARY		
CHECKING 9,093.51	SUPERCHECK	SAVINGS	PAID TO DATE THIS YEAR 148.57	TAXPAYER ID NUMBER 046-49-5262

OVERDRAFT/SUMMARY					
AVERAGE DAILY BALANCE	DAILY PERIODIC RATE	FINANCE CHARGE	ANNUAL PERCENTAGE RATE	AVAILABLE CREDIT	PAYMENT AMOUNT AND DATE DUE

CHECKS PAID OR DEBITS	DEPOSITS OR PAYMENTS	POSTING DATE	BALANCES
JUID INVESTMENT ACCOUNT 10-413-059-6	PREVIOUS BALANCE		8,724.98
	25.00	10/20	8,749.98
	13.58IN	10/24	8,763.56
E ANNUAL INTEREST RATE IS 06.1000% AS OF 10/24/83			
E ANNUAL INTEREST RATE IS 08.0000% AS OF 10/25/83			
3.32		10/26	8,760.24
	120.00	10/28	8,880.24
	200.00	10/31	9,080.24
	13.48IN	10/31	9,093.72
E ANNUAL INTEREST RATE IS 08.0000% AS OF 10/31/83			
	20.00	11/02	9,113.72
	150.00	11/04	9,263.72
	14.01IN	11/07	9,277.73
ANNUAL INTEREST RATE IS 08.0000% AS OF 11/07/83			
	100.00	11/08	9,377.73
167.40		11/08	9,210.33
ANNUAL INTEREST RATE IS 07.9000% AS OF 11/08/83			
130.59		11/09	9,079.74
	13.77IN	11/14	9,093.51
E ANNUAL INTEREST RATE IS 07.9000% AS OF 11/14/83			
WEEKLY RATE CHANGE			
THE ANNUAL INTEREST RATE IS 5.25% WHILE YJUR BALANCE REMAINS			
BELOW $ 2,500.00			

TICE: SEE REVERSE SIDE AND ACCOMPANYING STATEMENT(S) FOR IMPORTANT INFORMATION
ACCOMPANYING NOTICES FOR ADDITIONAL DETAILS ABOUT CERTAIN ELECTRONIC TRANSFERS TO OR FROM YOUR ACCOUNT(S)

1(23)

Shawmut
First County Bank, N.A.
90 Main St., Brockton, MA 02403

STATEMENT OF ACCOUNT

ACCOUNT NAME
3-[illegible]
ITEMS

STUDDS TRUST
56 ROSA'S LANE
SCITUATE MA 02066

STATEMENT DATE
12/15/83
CYCLE DAYS

DATE OF LAST STATEMENT
11/16

CREDIT LINE/NOW	SUPERCHECK	SAVINGS	FAIL TO DATE THIS YEAR	TAXPAYER ID NUMBER
9,277.16			294.16	04-6495252

AVERAGE DAILY BALANCE	DAILY PERIODIC RATE	FINANCE CHARGE	ANNUAL PERCENTAGE RATE	AVAILABLE CREDIT	PAYMENT AMOUNT AND DATE DUE

CHECKS PAID OR DEBITS	DEPOSITS OR PAYMENTS	POSTING DATE	BALANCES
LIQUID INVESTMENT ACCOUNT 10-415-009-5		PREVIOUS BALANCE	9,044.51
	13.75 IN	11/21	9,107.26
THE ANNUAL INTEREST RATE IS 07.90000% AS OF 11/21/83			
	150.00	11/[illegible]	9,257.26
	13.80 IN	11/[illegible]	9,271.06
THE ANNUAL INTEREST RATE IS 07.90000% AS OF 11/28/83			
	14.08 IN	12/[illegible]	9,285.14
THE ANNUAL INTEREST RATE IS 07.90000% AS OF 12/05/83			
THE ANNUAL INTEREST RATE IS 07.85000% AS OF 12/05/83			
	13.98 IN	12/12	9,299.12
THE ANNUAL INTEREST RATE IS 07.85000% AS OF 12/12/83			
THE ANNUAL INTEREST RATE IS 08.00000% AS OF 12/13/83			
WEEKLY RATE CHANGE			
THE ANNUAL INTEREST RATE IS 8.00% WHILE YOUR BALANCE REMAINS			
OVER $ 2,500.00			

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NOTICE SEE REVERSE SIDE AND ACCOMPANYING STATEMENT(S) FOR IMPORTANT INFORMATION.
ACCOMPANYING NOTICES FOR ADDITIONAL DETAILS ABOUT CERTAIN ELECTRONIC TRANSFERS TO OR FROM YOUR ACCOUNT(S).

1(24)

Shawmut
First County Bank, N.A.
90 Main St., Brockton, MA 02403
RATE NUMBER 0**30150

STATEMENT OF ACCOUNT

[redacted]
OF ITEMS

STUDDS TRUST
38 KUSAK'S LANE
SCITUATE MA 02066

STATEMENT DATE 1/17/84
CYCLE DAYS

DATE OF LAST STATEMENT 12/15

SUMMARY OF NEW BALANCES					
CHECKING OR NOW	SUPERCHECK	SAVINGS	PAID TO DATE THIS YEAR	TAXPAYER ID NUMBER	
1,110.35			2.20	04-6495202	

SUPERCHECK SUMMARY					
AVERAGE DAILY BALANCE	DAILY PERIODIC RATE	FINANCE CHARGE	ANNUAL PERCENTAGE RATE	AVAILABLE CREDIT	PAYMENT AMOUNT AND DATE DUE

CHECKS PAID OR DEBITS	DEPOSITS OR PAYMENTS	POSTING DATE	BALANCES
[redacted] GOLD INVESTMENT ACCOUNT 10-413-059-0	PREVIOUS	BALANCE	9,299.12
	14.27 N	12/19	9,313.39
THE ANNUAL INTEREST RATE IS 08.00004 AS OF 12/19/83			
THE ANNUAL INTEREST RATE IS 08.00004 AS OF 12/20/83			
190.35 -			
8,000.00 -			
		12/21	1,113.04
		12/23	1,117.04
	6.72 N	12/23	1,123.76
THE ANNUAL INTEREST RATE IS 05.25004 AS OF 12/23/83			
	1.13 N	12/30	1,124.89
THE ANNUAL INTEREST RATE IS 05.25004 AS OF 12/30/83			
	10.00	01/06	1,134.89
	1.13 N	01/09	1,136.02
THE ANNUAL INTEREST RATE IS 05.25004 AS OF 01/09/84			
30.35 -			
		01/13	1,104.22
	1.13 N	01/16	1,110.35
THE ANNUAL INTEREST RATE IS 05.25004 AS OF 01/16/84			
WEEKLY RATE CHANGE			
THE ANNUAL INTEREST RATE IS 5.25% WHILE YOUR BALANCE REMAINS BELOW $ 2,500.00			

NOTICE: SEE REVERSE SIDE AND ACCOMPANYING STATEMENT(S) FOR IMPORTANT INFORMATION
ACCOMPANYING NOTICES FOR ADDITIONAL DETAILS ABOUT CERTAIN ELECTRONIC TRANSFERS TO OR FROM YOUR ACCOUNT(S)

1(25)

Shawmut
First County Bank, N.A.
90 Main St., Brockton, MA 02403

STATEMENT OF ACCOUNT

13-059-6
0

STUDDS TRUST
38 ROSA'S LANE
SCITUATE MA 02066

STATEMENT DATE 02/15/84
CYCLE DAYS

DATE OF LAST STATEMENT 01/17

SUMMARY OF NEW BALANCES			INTEREST SUMMARY	
CHECKING OR NOW	SUPERCHECK	SAVINGS	PAID TO DATE THIS YEAR	TAXPAYER ID NUMBER
7,311.73			6.90	04-6495262

SUPERCHECK SUMMARY					
AVERAGE DAILY BALANCE	DAILY PERIODIC RATE	FINANCE CHARGE	ANNUAL PERCENTAGE RATE	AVAILABLE CREDIT	PAYMENT AMOUNT AND DATE DUE

CHECKS PAID OR DEBITS	DEPOSITS OR PAYMENTS	POSTING DATE	BALANCES
LIQUID INVESTMENT ACCOUNT 10-413-059-6		PREVIOUS BALANCE	1,110.35
	1.12IN	01/23	1,111.47
E ANNUAL INTEREST RATE IS 05.2500% AS OF 01/23/84			
	40.00	01/30	1,151.47
	1.12IN	01/30	1,152.59
E ANNUAL INTEREST RATE IS 05.2500% AS OF 01/30/84			
	1.16IN	02/06	1,153.75
E ANNUAL INTEREST RATE IS 05.2500% AS OF 02/06/84			
	6,156.74	02/13	7,310.49
	1.24IN	02/13	7,311.73
E ANNUAL INTEREST RATE IS 08.0000% AS OF 02/13/84			
E ANNUAL INTEREST RATE IS 08.0500% AS OF 02/14/84			
WEEKLY RATE CHANGE			
THE ANNUAL INTEREST RATE IS 5.25% WHILE YOUR BALANCE REMAINS BELOW $ 2,500.00			

3504054 6

NOTICE: SEE REVERSE SIDE AND ACCOMPANYING STATEMENT(S) FOR IMPORTANT INFORMATION
ACCOMPANYING NOTICES FOR ADDITIONAL DETAILS ABOUT CERTAIN ELECTRONIC TRANSFERS TO OR FROM YOUR ACCOUNT(S).

1(26)

Shawmut
First County Bank N.A.
90 Main St., Brockton, MA 02403
BANK NUMBER 01130150

STATEMENT OF ACCOUNT

ACCOUNT NUMBER
10-059-0

ITEMS
2

STUDDS TRUST
3M KUSA'S LANE
SCITUATE MA 02066

STATEMENT DATE
03/15/84
CYCLE DAYS

DATE OF LAST STATEMENT
02/15

IN MAKING DEPOSITS/BALANCES

CHECKING OR NOW	SUPERBOOK	SAVINGS	PAID TO DATE THIS YEAR	TAXPAYER ID NUMBER
1,270.93			68.23	06-6005262

CHECKING SUMMARY

AVERAGE DAILY BALANCE	DAILY PERIODIC RATE	FINANCE CHARGE	ANNUAL PERCENTAGE RATE	AVAILABLE CREDIT	PAYMENT AMOUNT AND DATE DUE

CHECKS PAID OR DEBITS	DEPOSITS OR PAYMENTS	POSTING DATE	BALANCES
JNEY MARKET DEPOSIT ACCT 10-059-0	PREVIOUS BALANCE		7,311.73
	11.29IN	02/17	7,323.02
HE ANNUAL INTEREST RATE IS 08.000%	AS OF 02/17/84		
	6,813.00	02/21	14,136.02
	20.33IN	02/27	14,156.35
HE ANNUAL INTEREST RATE IS 08.000%	AS OF 02/27/84		
	1,222.89	03/05	15,379.24
	21.85IN	03/05	15,401.09
HE ANNUAL INTEREST RATE IS 08.000%	AS OF 03/05/84		
	5,171.50	03/06	20,572.59
HE ANNUAL INTEREST RATE IS 08.100%	AS OF 03/06/84		
12,309.52		03/07	8,263.07
7,000.00		03/09	1,263.07
ANNUAL INTEREST RATE IS 05.250%	AS OF 03/09/84		
	7.86IN	03/12	1,270.93
HE ANNUAL INTEREST RATE IS 05.250%	AS OF 03/12/84		
WEEKLY RATE CHANGE			
THE ANNUAL INTEREST RATE IS 5.25% WHILE YOUR BALANCE REMAINS			
BELOW $ 2,500.00			

8504054 4469

NOTICE: SEE REVERSE SIDE AND ACCOMPANYING STATEMENT(S) FOR IMPORTANT INFORMATION
ACCOMPANYING NOTICES FOR ADDITIONAL DETAILS ABOUT CERTAIN ELECTRONIC TRANSFERS TO OR FROM YOUR ACCOUNT(S)

1(27)

Shawmut
First County Bank N.A.
90 Main St., Brockton, MA 02403
BANK NUMBER 011301150

STATEMENT OF ACCOUNT

ACCOUNT NUMBER
13-059-6
ITEMS
4

STUDDS TRUST
38 ROSA'S LANE
SCITUATE MA 02066

STATEMENT DATE
04/17/84
CYCLE DAYS

DATE OF LAST STATEMENT
03/15

SUMMARY OF NEW BALANCES			NOW AND SAVINGS INTEREST SUMMARY	
CHECKS OR NOW	SUPERCHECK	SAVINGS	PAID TO DATE THIS YEAR	TAXPAYER ID NUMBER
550.42			81.63	04-6485262

SUPERCHECK SUMMARY					
AVERAGE DAILY BALANCE	DAILY PERIODIC RATE	FINANCE CHARGE	ANNUAL PERCENTAGE RATE	AVAILABLE CREDIT	PAYMENT AMOUNT AND DATE DUE

CHECKS PAID OR DEBITS	DEPOSITS OR PAYMENTS	POSTING DATE	BALANCES
ONEY MARKET DEPOSIT ACCT 10-413-059-6	PREVIOUS BALANCE		1,270.93
	1.28IN	03/19	1,272.21
HE ANNUAL INTEREST RATE IS 05.2500% AS OF 03/19/84			
	1.28IN	03/26	1,273.49
HE ANNUAL INTEREST RATE IS 05.2500% AS OF 03/26/84			
	2,487.00 ✓	04/02	3,760.49
	1.40IN	04/02	3,761.89
HE ANNUAL INTEREST RATE IS 08.6000% AS OF 04/02/84			
HE ANNUAL INTEREST RATE IS 09.0000% AS OF 04/03/84			
76.60		04/09	3,685.29
	6.47IN	04/09	3,691.76
HE ANNUAL INTEREST RATE IS 09.0000% AS OF 04/09/84			
14.31		04/11	3,677.45
130.00		04/11	3,547.45
3,000.00		04/13	547.45
	2.97IN	04/13	550.42
HE ANNUAL INTEREST RATE IS 05.2500% AS OF 04/13/84			
WEEKLY RATE CHANGE THE ANNUAL INTEREST RATE IS 5.25% WHILE YOUR BALANCE REMAINS BELOW $ 2,500.00			

8504546 97

OTICE: SEE REVERSE SIDE AND ACCOMPANYING STATEMENT(S) FOR IMPORTANT INFORMATION
ACCOMPANYING NOTICES FOR ADDITIONAL DETAILS ABOUT CERTAIN ELECTRONIC TRANSFERS TO OR FROM YOUR ACCOUNT(S)

1(28)

Shawmut
First County Bank, N.A.
90 Main St., Brockton, MA 02403

TATEMENT OF ACCOUNT

ACCOUNT NUMBER
NO. OF ITEMS 2

STUDDS TRUST
38 ROSA'S LANE
SCITUATE MA 02066

STATEMENT DATE 05/02/84
CYCLE DAYS

DATE OF LAST STATEMENT 04/17

SUMMARY OF NEW BALANCES			NOW AND SAVINGS INTEREST SUMMARY	
CHECKING	SUPERCHECK	SAVINGS	PAID TO DATE THIS YEAR	TAXPAYER ID. NUMBER
.00			83.04	04-6495262

SUPERCHECK SUMMARY					
AVERAGE DAILY BALANCE	DAILY PERIODIC RATE	FINANCE CHARGE	ANNUAL PERCENTAGE RATE	AVAILABLE CREDIT	PAYMENT AMOUNT AND DATE DUE

CHECKS PAID OR DEBITS	DEPOSITS OR PAYMENTS	POSTING DATE	BALANCES
MONEY MARKET DEPOSIT ACCT 10-413-055-6	PREVIOUS BALANCE		550.42
	.55IN	04/23	550.97
THE ANNUAL INTEREST RATE IS 05.2500% AS OF 04/23/84			
	440.00	04/25	990.97
	70.00	04/30	1,060.97
	.86IN	04/30	1,061.83
THE ANNUAL INTEREST RATE IS 05.2500% AS OF 04/30/84			
7.00		05/01	1,054.03
1,054.03		05/02	.00

WEEKLY RATE CHANGE
THE ANNUAL INTEREST RATE IS 5.25% WHILE YOUR BALANCE REMAINS BELOW $ 2,500.00

8504054698

NOTICE: SEE REVERSE SIDE AND ACCOMPANYING STATEMENT(S) FOR IMPORTANT INFORMATION
SEE ACCOMPANYING NOTICES FOR ADDITIONAL DETAILS ABOUT CERTAIN ELECTRONIC TRANSFERS TO OR FROM YOUR ACCOUNT(S)

1(29)

Shawmut
First County Bank, N.A.
90 Main St., Brockton, MA 02403

STATEMENT OF ACCOUNT

ACCOUNT NUMBER
3-[illegible]-6

ITEMS
3

STUDDS TRUST
98 ROSA'S LANE
SCITUATE MA 02066

STATEMENT DATE
05/15/04
CYCLE DAYS

DATE OF LAST STATEMENT
05/02

VARY/DEPOSIT BALANCES			NOW AND SAVINGS INTEREST SUMMARY	
CHECKING / NOW	SUPERCHECK	SAVINGS	PAID TO DATE THIS YEAR	TAXPAYER ID NUMBER
517.23			33.54	06-6695762

CHECK SUMMARY					
AVG DAILY BALANCE	DAILY PERIODIC RATE	FINANCE CHARGE	ANNUAL PERCENTAGE RATE	AVAILABLE CREDIT	PAYMENT AMOUNT AND DATE DUE

CHECKS PAID OR DEBITS	DEPOSITS OR PAYMENTS	POSTING DATE	BALANCES
MONEY MARKET DEPOSIT ACCT 3-[illegible]-6	PREVIOUS	BALANCE	1.00
	54.03	05/04	54.03
	.18IN	05/07	54.21
ANNUAL INTEREST RATE IS 05.25[illegible] AS OF 05/07/04			
	463.00	05/13	517.21
	.32IN	05/14	517.53
ANNUAL INTEREST RATE IS 05.25[illegible] AS OF 05/14/04			
WEEKLY RATE CHANGE			
THE ANNUAL INTEREST RATE IS 0.25% WHILE YOUR BALANCE REMAINS BELOW $ 2,500.00			

3504054469

SEE REVERSE SIDE AND ACCOMPANYING STATEMENT(S) FOR IMPORTANT INFORMATION.
ACCOMPANYING NOTICES FOR ADDITIONAL DETAILS ABOUT CERTAIN ELECTRONIC TRANSFERS TO OR FROM YOUR ACCOUNT(S)

1(30)

Shawmut Banks

STATEMENT OF ACCOUNT

DIRECT INQUIRIES TO
SHAWMUT FIRST COUNTY BANK, N.A.
BRANCH 006
PO BOX 972
BROCKTON MA 02403

(617) 586-5500

ACCOUNT NUMBER
413-059-6

TAXPAYER ID NUMBER
04-6495262

STATEMENT PERIOD
05/15/84 THRU 06/15/84

1 ENCLOSED ITEM

PREPARED FOR
STUDDS TRUST
38 ROSA'S LANE
SCITUATE MA 02066

**********HERE IS YOUR NEW STATEMENT!**********
NOW YOUR PAID CHECKS ARE LISTED IN NUMERICAL ORDER TO MAKE BALANCING YOUR CHECKBOOK FASTER AND EASIER THAN EVER.

ACCOUNT SUMMARY 200471

TYPE OF ACCOUNT	BEGINNING BALANCE	CHECKS/ DEBITS	DEPOSITS/ CREDITS	ENDING BALANCE
MONEY MARKET DEP	517.53	463.00	305.83	360.36

ACCOUNT ACTIVITY

MONEY MARKET DEPOSIT ACCOUNT 10-413-059-6

******CHECKS******

NUMBER	DATE	AMOUNT	NUMBER	DATE	AMOUNT
118	05/24	463.00			

1 CHECK TOTALING 463.00 ✓

******OTHER DEBITS******

NONE

******DEPOSITS/CREDITS******

	DATE	AMOUNT
INTEREST PAID	05/21	.52
INTEREST PAID	05/25	.19
INTEREST PAID	06/04	.06
INTEREST PAID	06/11	.06
DEPOSIT	06/12	305.00 ✓

5 DEPOSITS/CREDITS TOTALING 305.83

DAILY BALANCE

DATE	ENDING BALANCE
05/21	518.05
05/24	55.05
05/25	55.24
06/04	55.30
06/11	55.36
06/12	360.36

INTEREST PAID YEAR TO DATE 84.37

THE INTEREST PAID TO YOUR ACCOUNT WILL BE 5.2500% WHENEVER BALANCE FALLS BELOW $2,500.00

1(31)

Shawmut Banks

STATEMENT OF ACCOUNT

DIRECT INQUIRIES TO
SHAWMUT FIRST COUNTY BANK, N.A.
BRANCH 006
PO BOX 972
BROCKTON MA 02403

(617) 586-5500

ACCOUNT NUMBER
413-059-6

TAXPAYER ID NUMBER
04-6495262

STATEMENT PERIOD
06/15/84 THRU 07/17/84

1 ENCLOSED ITEM

PREPARED FOR
STUDDS TRUST
38 ROSA'S LANE
SCITUATE MA 02066

SHAWMUT OFFERS A VARIETY OF SAVINGS AND INVESTMENT PLANS DESIGNED TO SUIT YOUR GOALS AND NEEDS. FOR MORE INFORMATION CALL 1-800-SHAWMUT OR ASK YOUR PERSONAL BANKER.

ACCOUNT SUMMARY

200385

TYPE OF ACCOUNT	BEGINNING BALANCE	CHECKS/ DEBITS	DEPOSITS/ CREDITS	ENDING BALANCE
MONEY MARKET DEP	360.36	305.00	.52	55.88

ACCOUNT ACTIVITY

MONEY MARKET DEPOSIT ACCOUNT 10-413-059-6

******CHECKS******

NUMBER	DATE	AMOUNT	NUMBER	DATE	AMOUNT
119	06/18	305.00			

1 CHECK TOTALING 305.00

******OTHER DEBITS******

NONE

******DEPOSITS/CREDITS******

	DATE	AMOUNT
INTEREST PAID	06/18	.28
INTEREST PAID	06/25	.06
INTEREST PAID	07/02	.06
INTEREST PAID	07/09	.06
INTEREST PAID	07/16	.06

5 DEPOSITS/CREDITS TOTALING .52

INTEREST PAID YEAR TO DATE 84.89

THE INTEREST PAID TO YOUR ACCOUNT WILL BE 5.2500% WHENEVER BALANCE FALLS BELOW $2,500.00

DAILY BALANCE

DATE	ENDING BALANCE
06/18	55.64
06/25	55.70
07/02	55.76
07/09	55.82
07/16	55.88

1(32)

GCC #4509

Human Rights Campaign Fund

Post Office Box 1396 Washington, D. C. 20013

white

August 30, 1984

Ms. Lois Lerner, Esq.
Federal Election Commission
1325 K Street, NW
Washington, DC 20463

Re: MUR 1744

RECEIVED
FEDERAL ELECTION COMMISSION
GENERAL COUNSEL
84 AUG 30 P3:53

Dear Ms. Lerner:

With regard to the complaint filed by Peter F. Flynn the solicitation letter from Dan J. Bradley, Co-Chair of the Human Rights Campaign Fund, which was referred to by Flynn, explicitly stated that contributions sought by the letter were to be made to the Studds Trust Fund and that the proceeds were to be used exclusively to help repay Congressman Studds' legal fees for matters related to the House investigation. Moreover, the checks were to be made out to the Studds Trust Fund and not the Human Rights Campaign Fund. These checks were then transmitted directly by the Human Rights Campaign Fund to the Studds Trust Fund. The checks that were transmitted were not only not from the Human Rights Campaign Fund, but were not in themselves contributions to be used for election purposes. They were, therefore, not subject to reporting by the Human Rights Campaign Fund to the Federal Election Commission. It is our understanding that the Studds Trust Fund did, in fact, use these funds soley for purposes of defraying these legal bills and not for any election purposes.

If I can be of any further assistance, please do not hesitate to call on me.

Sincerely,

Victor J. Basile
Treasurer

Attachment 2

8504054702

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Edwin M. Martin, Jr., Treasurer
Committee to Re-Elect Congressman Studds
P.O. Box 5
Norwell, Massachusetts 02601

RE: MUR 1744
Committee to Re-Elect
Congressman Studds; Edwin M.
Martin, Jr., as treasurer

Dear Mr. Martin:

The Federal Election Commission notified the Committee to Re-Elect Congressman Studds ("Committee") and you, as treasurer, on July 31, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

Upon further review of the allegations contained in the complaint, and information supplied by you, the Commission, on , 1984, determined that there is reason to believe the Committee and you, as treasurer, violated 2 U.S.C. §§ 434(b)(5)(A), 441b(a), and 434(b)(3)(B), and 11 C.F.R. §§ 104.13 and 104.3(b). Specifically, it appears that the Committee failed: to properly disclose two expenditures to the Rockland Trust Company (May 15, 1984, and June 15, 1984) involving credit card transactions (2 U.S.C. § 434(b)(5)(A) and 11 C.F.R. § 104.3(b)); accepted an in-kind contribution from Metro (7-9 Landsdowne Corporation) in connection with a display ad in the Metro Sunday Times (2 U.S.C. § 441b(a)); and, failed to report the receipt of an in-kind contribution from the Human Rights Campaign Fund ("Fund") in connection with a solicitation letter mailed by the Fund which was, in part, for the purpose of influencing a federal election (2 U.S.C. § 434(b)(3)(B) and 11 C.F.R. § 104.13).

In addition, the Commission also determined that there is reason to believe the Studds Trust Fund violated 2 U.S.C. § 433 and § 434 by failing to register and report as a political committee as a result of its transfer of $1,768 to the Human Rights Campaign Fund on July 30, 1984.

Attachment 3(1)

8504547033

The Office of General Counsel would like to settle this matter through conciliation prior to a finding of probable cause. However, in the absence of any information which demonstrates that no further action should be taken against your committee, you, as treasurer, and the Studds Trust Fund, the Office of General Counsel must proceed to the next compliance stage.

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 Maura White, the staff member assigned to this matter, at (202) 523-4143.

Sincerely,

3504054704

3(2)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Victor J. Basile, Treasurer
Human Rights Campaign Fund
713 D Street, S.E.
Washington, D.C. 20003

RE: MUR 1744
Human Rights Campaign Fund;
Victor J. Basile, as treasurer

Dear Mr. Basile:

The Federal Election Commission notified the Human Rights Campaign Fund and you, as treasurer, on July 31, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

Upon further review of the allegations contained in the complaint, and information supplied by you, the Commission, on , 1984, determined that there is reason to believe the Human Rights Campaign Fund and you, as treasurer, have violated 2 U.S.C. § 434(b)(6)(B)(i), a provision of the Act. Specifically, it appears that the Human Rights Campaign Fund failed to report a contribution to the Committee to Re-Elect Congressman Studds in connection with its payment of a solicitation letter for the Studds Trust Fund which was, in part, for the purpose of influencing a federal election.

You may submit any factual or legal materials that you believe are relevant to the Commission's analysis of this matter. Please file any such response within ten days of your receipt of this notification.

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

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3(3)

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 Maura White, the staff member assigned to this matter, at 523-4143.

Sincerely,

8504054706

3(4)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Metro (7-9 Landsdowne Corporation)
7 Landsdowne Street
Boston, Massachusetts 02215

RE: MUR 1744
Metro (7-9 Landsdowne Corporation)

Dear Sir or Madam:

On , 1984, the Federal Election Commission determined that there is reason to believe Metro (7-9 Landsdowne Corporation) violated 2 U.S.C. § 441b(a), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against Metro (7-9 Landsdowne Corporation). You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter within ten days of your receipt of this letter. In addition, please submit a copy of the display ad which appeared in the Metro Sunday Times with respect to a fundraiser for Representative Studds held at Metro on April 15, 1984.

In the absence of any additional information which demonstrates that no further action should be taken against Metro (7-9 Landsdowne Corporation) the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if so desired. See 11 C.F.R. § 111.18(d).

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

The investigation now being conducted will be confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A),

3(5)

8504054707

unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Maura White, the staff member assigned to this matter, at (202) 523-4143.

Sincerely,

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

8504054708

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO. 1744

RESPONDENT: Metro (7-9 Landsdowne Corporation)

SUMMARY OF ALLEGATIONS

Metro (7-9 Landsdowne Corporation) made a contribution to the Committee to Re-Elect Congressman Studds by placing an advertisement in the Metro Sunday Times in connection with a federal election, in the violation of 2 U.S.C. § 441b(a).

FACTUAL BASIS AND LEGAL ANALYSIS

In the April 20, 1984, edition of the Patriot Ledger it was reported that Representative Studds "will check with federal election officials before he accepts money from a fundraiser held on 'gay night' at the Boston nightclub Metro, a spokesman for the Congressman said yesterday." According to the Patriot Ledger, the spokesman, Peter Fleischer, "said the problem was that Metro may advertised for the event in The Metro Sunday Times, a newsletter oriented toward the gay community." It was reported that "Fleischer said the campaign committee paid for the actual fund-raiser which was held Sunday. He said $3 was charged at the door; $2 went to Studds and $1 paid for the use of the nightclub." Another news article in The Enterprise (April 19, 1984, edition) also referred to a "Studds fundraising event which was promoted in a Boston gay newsletter called the Metro Sunday Times." The Enterprise reported that "[a] signed letter

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from George Tamsitt -- described as the promotion manager of the club -- noted that '... we will be hosting Gerry Studds and raising money for his re-election' April 15 at the club." According to The Enterprise, the "newsletter also featured, on the back cover, a display advertisement calling attention to the 'Gerry Studds Benefit,' which was 'Metro's declaration of support... show your support'." The Enterprise also stated that there "was no mention anywhere in the advertisement that it was paid for by anyone associated with the Studds campaign."*/

Pursuant to 2 U.S.C. § 441b(a), a corporation is prohibited from making a contribution or expenditure in connection with a federal election, and a political committee is prohibited from knowingly accepting or receiving any contribution prohibited by 2 U.S.C. § 441b(a).

As set forth at 2 U.S.C. § 431(8)(A)(i) the term contribution includes any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for federal office. The term "expenditure" is defined at 2 U.S.C. § 431(9)(B)(i) to include any purchase, payment, distribution, loan, advance, deposit, or gift of money or anything of value, made by any person for the purpose of influencing any election for federal office. The term "anything of value" includes all in-kind contributions. 11 C.F.R. § 100.8(a)(1)(iv)(A).

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*/ In contrast to the Patriot Ledger, The Enterprise reported Peter Fleischer as saying that the campaign did not pay any of the costs of running the fundraiser at Metro.

3(8)

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The question which arises herein from the information reported in the Patriot Ledger and The Enterprise is whether Metro, a Boston nightclub at which the April 15, 1984, fundraiser for Representative Studds was conducted, made a "contribution" in connection with a federal election when it advertised the event in a "display ad" on the back cover of the Metro Sunday Times. Metro is an incorporated entity and, hence, prohibited from making a contribution or expenditure in connection with a federal election. The Committee to Re-Elect Congressman Studds ("Committee") was apparently aware of the ad in that the Committee's agent, Peter Fleischer, acknowledged to the Patriot Ledger that Metro may have advertised the event in the Metro Sunday Times. Moreover, the advertisement itself apparently did not state who absorbed its cost. Indeed, the purported language in the display ad that the event constitutes "Metro's declaration of support ... show your support" suggests that the ad was paid for by Metro. It is this office's view that such language, in combination with the statement "Proceeds to benefit Studds' re-election to Congress" constitutes an expenditure in connection with a federal election and, hence, an in-kind contribution to Representative Studds. That the Committee might have eventually reimbursed Metro for the cost of the ad does not negate the fact that a prohibited in-kind contribution was made by Metro.

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Although it may be argued that an (incorporated) entity whose business involves promotional events must be allowed in its ordinary course to promote those events, it is the language of the instant advertisement which brings it outside the scope of permissibility, in this office's view. Hence, it is the recommendation of this office that the Commission find reason to believe Metro (7-9 Landsdowne Corp.) violated 2 U.S.C. § 441b(a) by making a contribution in connection with a federal election.

8504054712

3(10)

MCC #4509

Human Rights Campaign Fund

(202) 546-2065
Post Office Box 1398 Washington, D. C. 20013

White

August 30, 1984

Ms. Lois Lerner, Esq.
Federal Election Commission
1325 K Street, NW
Washington, DC 20463

Re: MUR 1744

RECEIVED
FEDERAL ELECTION COMMISSION
GENERAL COUNSEL
'84 AUG 30 P3:53

Dear Ms. Lerner:

With regard to the complaint filed by Peter F. Flynn, the solicitation letter from Dan J. Bradley, Co-Chair of the Human Rights Campaign Fund, which was referred to by Flynn, explicitly stated that contributions sought by the letter were to be made to the Studds Trust Fund and that the proceeds were to be used exclusively to help repay Congressman Studds' legal fees for matters related to the House investigation. Moreover, the checks were to be made out to the Studds Trust Fund and not the Human Rights Campaign Fund. These checks were then transmitted directly by the Human Rights Campaign Fund to the Studds Trust Fund. The checks that were transmitted were not only not from the Human Rights Campaign Fund, but were not in themselves contributions to be used for election purposes. They were, therefore, not subject to reporting by the Human Rights Campaign Fund to the Federal Election Commission. It is our understanding that the Studds Trust Fund did, in fact, use these funds soley for purposes of defraying these legal bills and not for any election purposes.

If I can be of any further assistance, please do not hesitate to call on me.

Sincerely,

Victor J. Basile
Treasurer

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8504054471 4

Human Rights Campaign Fund
Post Office Box 1396
Washington, DC 20013

Ms. Lois Lerner, Esq.
Federal Election Commission
1325 K Street, NW
Washington, DC 20463

94 AUG 30 P3:53
RECEIVED
OFFICE OF THE
GENERAL COUNSEL

Human Rights Campaign Fund

Post Office Box 1388 Washington, D. C. 20013

GCC #4379

August 20, 1984

Ms. Kim Todd
Federal Election Commission
1325 K Street, NW
Washington, DC 20463

RE: MUR 1744

Dear Ms. Todd:

In connection with MUR 1744, we received the complaint from the Federal Election Commission on August 16, 1984. The postmark on the envelope sent by the Federal Election Commission containing the complaint is August 14, 1984. A copy of that envelope is enclosed. In addition we signed a return receipt for that envelope on August 16th. Accordingly, we request until August 31st, 15 days from the date of our receipt of the complaint, in which to file a response.

Sincerely,

Victor J. Basile
Treasurer

cc: Charles Steele
General Counsel
Federal Election Commission

3504054715

AUG20 All: 56

CLAIM CHECK NO.
[illegible]

☐ HOLD

DATE

1ST NOTICE

2ND NOTICE

RETURN

Detached from PS Form 3849-A Oct. 1980

Victor J. Basile
Treasurer
Human Rights Campaign Fund
713 D Street, N.E.
Washington, D.C. 20003

CERTIFIED
#943283



nan Rights
Campaign Fund
Box 1396, Washington, D.C. 20013

85040547 1

Ms. Kim Todd
Federal Election Commission
1325 K Street, NW
Washington, DC 20463

Studds for Congress

RECEIVED AT THE FEC
HAND DELIVERED
84 AUG 17 P3:1

August 15, 1984

GCC
#4370

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

RE: MUR 1744

Dear Mr. Gross:

This is in answer to your letter of July 31, 1984, received on August 2, 1984. By this letter, the Committee to Re-elect Congressman Studds emphatically denies that the Committee or any of its employees have violated any of the federal election laws as alleged in the complaint of Congressman Studds' opponent for re-election, Peter Y. Flynn. We answer each of the charges in that complaint in turn.

The Flynn complaint's first allegation is that the Committee failed to disclose expenditures by the Committee for "as many as three" fund-raising events in California. In fact, the campaign has fully disclosed all the expenditures for its California fundraising events, of which there were only two. Representative Studds visited California on May 4 through May 7, 1984. He flew to Los Angeles where he spoke on Central America and attended several political functions, none of which involved fundraising. Representative Studds then flew to the San Francisco area where he attended two fundraisers organized by his campaign committee (referred to by the newspaper article in Appendix A of the Flynn complaint). The fundraisers took place in Berkeley and in San Francisco. Representative Studds then flew back to the East Coast.

The Committee organized, paid for and reported the expenses associated with Representative Studds' trip and fundraising activities in accordance with the federal election laws; in fact, our office twice called the Commission to verify that we were using proper procedures. The Committee paid for Representative Studds' travel costs, and for some of his dining expenses, by Mastercard. That expenditure is reported in Schedule B (Disbursements), page 4, lines B and C. The Committee hired an agent, David Bender, to organize the fundraising events in California. His consulting fee is listed in Schedule B, page 9, line B. Mr. Bender and Peter Fleischer, the Committee's campaign manager, paid the costs of the fundraising events and were reimbursed by the campaign. Committee members twice called the Commission to determine that this procedure was proper; in both cases, staff members of the Commission assured them that it was. The

8504047 18

South Shore headquarters: Standish Village Plaza (Rt. 139), Pembroke, MA 02359 (617) 826-7561
Greater New Bedford headquarters: 1114 Acushnet Avenue, New Bedford, MA 02746 (617) 997-1541
Cape and Islands headquarters: 73B Center Street, Hyannis, MA 02601 (617) 771-6084

Authorized by the Studds for Congress Committee.

reimbursements to Mr. Bender and Mr. Fleischer are reported respectively in Schedule B, page 9, line C, and Schedule B, page 12, line E. The Committee also reimbursed Rep. Studds for money he paid for travel expenses, as shown in Schedule B, page 9, line G.

The following list summarizes the above expenses and where they were reported in Rep. Studds' Disclosure Statement:*

SCHEDULE B - DISBURSEMENTS

Page	Line	Date	Amount	Purpose
4	B	5-15-84	418.80	Mastercard: dinner, travel (359.50 for airfare to West Coast)
4	C	6-15-84	21.00	Mastercard: dinner (minimum Mastercard payment)
9	B	5-10-84	200.00	David Bender for consulting
9	C	5-21-84	600.00	David Bender: reimbursement for food & beverage expenses
9	G	5-21-84	11.00	Gerry Studds: reimbursement for travel expenses
12	E	5-02-84	1,361.38	Peter Fleischer: reimbursement for printing, postage, and paper supplies

The above discussion fully disposes of the first charge in the Flynn complaint. The Committee has fully complied with the federal election laws by providing detailed disclosure of all of its expenses, including those associated with the California trip and with its fundraising activities. We would be happy to provide you with the receipts of those expenditures if you so desire.

The Flynn complaint's second charge against the Committee is unclear. The complaint asks the Commission to examine the "status" of the Studds' Trust, a trust fund established to raise money to pay legal fees resulting from a House investigation of Rep. Studds. It alleges that the Studds' Trust has engaged "in fundraising efforts which should be legally governed by the FEC statutues." However, the Commission has already considered the Studds' Trust and in Advisory Opinion 1983-21 has stated that the Trust is not subject to the Federal Election Campaign Act or to FEC regulations as long as it meets certain conditions. According to the Advisory Opinion,

> The Commission concludes that to the extent the proposed trust fund is used exclusively for the purpose of paying the costs of Rep. Studds legal defense arising from Congressional or other proceedings not involving compliance or audit matters under the Act, donations to and disbursements from the Trust would not constitute

*The Committee's complete report for this period was attached to to the Flynn complaint as Appendix C.

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> contributions or expenditures under the Act... Accordingly, neither the source nor the amount of donations to the Trust would be limited under the Act or Commission regulations. Nor would the Act or regulations require any reporting of receipts or payments of the Trust. In reaching this conclusion the Commission also assumes that none of the residual funds, upon dissolution of the Trust, will be distributed or transferred to your campaign committee or to any other political committee.

The Studds' Trust has been established and operated in precisely the same manner as was considered and approved by the Commission in the Adivsory Opinion. The Trust is not a political committee. It has always raised and spent funds exclusively to pay the legal fees incurred by Rep. Studds in connection with the House investigation, and to pay operating expenses of the Trust itself. The Trust has not made any contributions to or expenditures on behalf of any candidate or political committee and is in the process of being dissolved after having accomplished its purpose. We have included detailed records of the Studds' Trust finances as Attachment 1 to this letter.

These facts demonstrate that the Studds' Trust is not subject to the registration, reporting, contribution, or expenditure provisions of the Federal Election Campaign Act (FECA) and the FEC's regulations. Nevertheless, the Flynn complaint cites a letter from Dan J. Bradley of the Human Rights Campaign Fund to potential contributors to the Studds' Trust as evidence that the Studds' Trust has engaged in political fundraising governed by the FECA. As discussed earlier, the Trust has been used exclusively to pay Rep. Studds' legal bills in connection with a House investigation. All the money raised by Mr. Bradley's letter was deposited in the Trust. Therefore, all of the money raised by Mr. Bradley's letter was used exclusively to pay legal fees, and is not subject to the requirements of the FECA.

We also note that the letter is a straightforward request for contributions to the Studds' Trust in order to defray Rep. Studds' legal expenses. Contrary to the allegations in the complaint, the letter does not ask for contributions to Rep. Studds' campaign or for support for Rep. Studds in any election.

The above discussion demonstrates that the charges made in the Flynn complaint against the Committee and its employees are groundless. Contrary to the allegations in the complaint, the Committee has fully disclosed all expenses, including those associated with two California fundraisers. The complaint is also incorrect in claiming that the Studds' Trust, a fund used exclusively to pay legal bills for a House investigation of Rep. Studds, is subject to the restrictions of FECA.

Although this concludes our answers to the formal charges made in the Flynn complaint, the complaint also makes two insinuations of unlawful conduct which we would like to address. First, it claims

3 5 0 4 0 4 7 2 3 0

that members of the Human Rights Campaign Fund are promoting Rep. Studds' candidacy, and implies that such promotion is unlawful. Although we are unaware of the extent of the Campaign Fund's support of Rep. Studds, the organization certainly has the right to support Rep. Studds if it chooses to do so. It is registered with the FEC as a political committee, and we welcome its support as long as it complies with the federal election laws. To our knowledge, it has complied with those laws.

Most important in these proceedings is the fact that any support given by the Fund and its members to Representative Studds' election campaign has been entirely independent of and unrelated to the establishment and operations of the Studds' Trust. The Fund's contribution to the Studds' Trust was the mailing of the Bradley letter (Appendix E of the Flynn complaint) to persons on the Fund's mailing list. The purpose of the letter was to raise money for the Studds' Trust to pay Rep. Studds' legal bills and the funds subsequently raised were used exclusively for that purpose. Those funds raised in excess of Congressman Studds' legal fees and nominal operating expenses of the Trust were returned to the Human Rights Campaign Fund to defray the costs of mailing the Bradley letter. The Fund's contribution to the Studds' Trust thus did not have the purpose or effect of influencing any federal election and therefore was not governed by the FECA.

Finally, the Flynn complaint implies that "recent problems with the Committee's fundraising" have resulted in violations of the federal election laws, and it refers to newspaper articles written about a fundraiser at the Metro Club in Boston. The operation and reporting of this fundraiser were entirely proper. Metro promoted and held a fundraiser for Rep. Studds on April 15,1984. Metro bore all the initial expenses. A total of $4,745.00 was collected and paid to the campaign committee, $4,511.00 by cashiers check and $234.00 in small anonymous contributions. The Committee then paid Metro a total of $2,229.50 for the promotion and holding of the function. This disbursement is listed on Schedule B, page 2, line I, to Entertainment, Inc.*

This concludes our response to the complaint of Peter Y. Flynn in MUR 1744. We would be happy to provide you with additional records and documentation if you so desire. Please let us know if you need any additional information.

Sincerely,

Mary Lou Butler

Mary Lou Butler
Finance Manager

Enclosures

*We note that the newspaper article included in Appendix D, of the complaint, "Studds Fundraisers May Have Violated Federal Election Law," Brockton Enterprise, April 19, 1984, quoted Peter Fleischer as saying that the campaign did not pay any costs of running the fundraiser. Mr. Fleischer's reference was to the upfront costs of the fundraiser.

5047921

STUDDS' TRUST FINANCIAL SUMMARY

CONTRIBUTIONS

Generated by Bradley Letter	23,129.13
Other	19,870.00
Total contributions	42,999.13*
Interest	311.19
	43,310.32
	(see bank statements attached)

EXPENDITURES

Legal fees	40,309.52
Reimbursement to Human Rights Campaign Fund	1,768.00
Other operating expenses	1,156.92
Total expenses	43,234.44
	(see bank statements and copies of cancelled checks attached)

BALANCE IN ACCOUNT

75.88

*This figure includes one $20.00 deposit made on 7/26/84 for which the bank statement has not been received.

8504147 23

DAN J. BRADLEY
PO BOX 1396
WASHINGTON, D C 20013

8504054472 3

Dear Friend,

On July 14, U.S. Congressman Gerry Studds (D-MA) walked to the lectern on the floor of the House of Representatives and delivered in strong, confident tones a statement unlike any previously made in our national legislature:

> "All Members of Congress," said Studds, "must cope with the challenge of initiating and maintaining a career in public office without destroying entirely the ability to lead a meaningful and emotionally fulfilling private life. It is not a simple task for any of us to meet adequately the obligations of either public or private life, let alone both. But these challenges are made substantially more complex when one is, as am I, both an elected public official and gay."

With those words, Congressman Studds became the first member of Congress to publicly affirm his homosexuality.

Studds' historic statement came during the course of his response to charges made by the House Committee on Standards of Official Conduct that he had engaged in an improper sexual relationship with a 17-year-old male page in 1973, during his first term in office.

Studds was not the first public official to have difficulties related to homosexual activity, but he was the first not to hide from his own identity; the first not to cite "alcoholism," "drug problems," "psychological pressures," or even "homosexual tendencies" as an excuse. Gerry Studds just admitted to an error in judgement, and stated without shame or sorrow that he is gay.

In so doing, Studds set a standard for courage and dignity that will make it far easier for others to be open about being gay. His speech on the floor prompted thousands of letters congratulating him for his decision, and expressing gratitude for the strength and eloquence of his words. Let me quote from three of those letters:

> "I saw, heard and re-read many times your speech to the House. I was dumbstruck, and moved to tears by your courage, pride, honesty, poise and resoluteness. If I ever, myself, rise even half so well to half so trying a moment, I think I shall consider my life, to that moment, a success and my dues -- such as any might reckon them -- fully paid. At last, a Congressman I can look up to, who represents <u>me</u>!" -- From New York

"When I heard your statement to Congress on NPR recently, I lofted my sheetrock hammer across the room and cheered. A Congressman comes out with class! -- sure, measured voice, no half-baked apologies, "gay" rather than "homosexual." You have my deep respect for transforming what must be a lonely, traumatic event into a noble moment for us all...you have done a fine and brave thing for all of us." -- From North Carolina

"I was proud of you today when I saw you standing before the House making your precise, fine-tuned statement. I was proud of the way you looked, proud of what you said, proud of the way you said it. You affirmed my/our complex presence in this world. I am sorry that such an affirmation is contingent on what is clearly a painful and embarassing time for you and those you love. Thank you for not running away. Thank you for your courageous, public, personal response...There are millions of gay people, who are prouder of themselves because of the way you have chosen to publicly respond to the realities of your life." -- From Oregon

Gerry Studds' decision to be honest and open about himself was, he says, personally the best thing he has ever done. He feels great.

But, not everyone understands. It is likely that the refusal by Congressman Studds to be more visibly contrite about his past mistake, and about his sexual preference, in general, contributed to the decision by the House of Representatives to vote to censure him on the House floor. It is likely, as well, that the investigation concerning Studds which was made by the House Committee on Standards of Official Conduct, was far more extensive and exhaustive than it would have been if a heterosexual relationship had been involved. Consider, for example, that the Committee began investigating charges concerning misbehavior by Members of Congress in 1981 and 1982. How much time and how much work did it take to inquire all the way back to 1973 to expose a relationship which was, even according to the Committee, without coercion, which did not involve any preferential treatment, express or implied, which did not include any harassment of any kind, and which involved a young man who was for legal purposes, an adult?

During the course of its investigation, the Committee spent hundreds of thousands of dollars and interviewed hundreds of people, inquiring into virtually every phase of Congressman Studds' personal life for the past ten years. At the start, Studds refused to hire a lawyer. But ultimately, as the investigation went on, and friends and staff members were subjected to repeated interrogation, he relented. The legal bills ultimately exceeded $40,000, money Studds does not have.

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Recently, a group of supporters from Congressman Studds' district in Massachusetts, from Washington, and elsewhere around the country, established a Trust Fund to help defray these legal expenses. About one-half the money has already been raised. I would like to ask you to join in making a contribution to this Trust, the proceeds from which will be used exclusively to re-pay these legal fees.

By making such a contribution, you will do far more than help alleviate this debt. You will be telling Gerry Studds that you appreciate his decision to tell the truth about his sexuality, and his determination to insist that sexual preference is irrelevant to a person's performance in professional life.

In addition, you will bolster the groundswell of sentiment within the Gay Community -- a sentiment matched only by Studds' own Massachusetts constituents -- that he should run for re-election this fall. That decision will be, for him, an enormously difficult and intensely personal choice. A political campaign is always arduous under any circumstances, but in 1984, for Gerry Studds, it promises to be brutal indeed.

I know Gerry Studds, and I have followed with interest his career in Congress. During his 12 years in office, he has gained a reputation for hard work, accessibility, personal honesty, and intense dedication to the vital economic and environmental concerns of his district encompassing the southeastern Massachusetts coast. Above all, Congressman Studds has displayed throughout his career the kind of eloquence and wit so rarely found in politics today; an eloquence which has made him one of our most persuasive defenders of human rights and civil liberties both within the United States and in international affairs; and which -- as evidenced by his speech last July 14 -- grants him the ability to communicate his ideas with a unique and commanding strength.

Congressman Studds' constituents agree. After barely winning election for the first time in 1972, he has steadily increased his margin of victory. In 1982, he received 68 percent of the vote, and carried every town and precinct in his district.

But 1984 promises to be very different and a far more difficult kind of campaign. Several local politicians have announced their intention to campaign for Studds' seat, and he has been targeted by right-wing organizations as a prime candidate for defeat.

I believe it is important that Gerry Studds be re-elected. He is a superb Congressman. Our country needs many more with his talent and dedication. Simply by doing his job the way he has in the past, Studds will be serving his constituents, and making it easier every day for all of us to argue openly that sexual preference is no bar to competence, effectiveness or public respect.

A contribution to the Studds Trust Fund will have an important practical effect. It will tell Congressman Studds that he has the

support he needs to make it through the year ahead. It will let him know that we deeply admire and respect the way he handled himself during the investigation and House vote. He has given thousands of gay men and lesbians who have faced similar allegations and inquiries into their personal lives reason to be proud.

By making a contribution to the Studds Trust Fund, you can send Gerry Studds your vote of confidence, to encourage him to run in 1984. You can send a message of friendship and support to a hard-working congressman who deserves the very best. Please make your check payable to the Studds Trust Fund and send it to my attention, c/o Dan J. Bradley, Co-Chair, Human Rights Campaign Fund, P.O. Box 1396, Washington, D.C 20013.

Thank you for your continued support of the Human Rights Campaign Fund.

Sincerely,

Dan J Bradley

Dan J. Bradley
Co-Chair
Human Rights Campaign Fund

P.S. Congressman Gerry Studds is a co-sponsor of the federal gay civil rights legislation. He has spoken out frequently on issues of concern to gay men and lesbians.

8504054726

3504054427

DAN J. BRADLEY

[redacted]

I want Congressman Studds to know how much I admire and respect the stand he took in Congress. Enclosed is my check of:

☐ $25 ☐ $50 ☐ $75 ☐ $100 ☐ Other _____

Keep up the good work!

Make check payable to:
Studds Trust Fund.
Send it with this form to
c/o Dan J. Bradley, P.O. Box 1396,
Washington, D.C. 20013.

Check one. to charge your remittance:

☐ MasterCard ☐ Visa

_____
Your credit card number (All digits, please)

Mo. _____ Yr. _____
Credit Card
valid thru

_____
(Your Signature)

NO POSTAGE
NECESSARY
IF MAILED
IN THE
UNITED STATES

BUSINESS REPLY MAIL
FIRST CLASS PERMIT NO. 12998 WASHINGTON, D.C.

POSTAGE WILL BE PAID BY:

DAN J. BRADLEY
c/o HRCF
P.O. Box 1396
Washington, D.C. 20013

8 2 7 4 4 5 0 4 0 5 3

2504

STUDD'S TRUST NO. 102

Sept 29 19 83 63-150/113

PAY TO THE ORDER OF Rodney, Hawkes & Goldings $ 10,000.00

Ten Thousand DOLLARS 00/100 CENTS

Shawmut First County Bank, N.A. Brockton, Massachusetts 02403

LIQUID INVESTMENT ACCOUNT

MEMO legal fees Mary Lou Butler

:011301507: 104113059 6 0102 000010000000

STUDD'S TRUST NO. 103

Sept 29 19 83 63-150/113

PAY TO THE ORDER OF Gerry C. Studds $765.30

One Hundred and fifty-five DOLLARS 30/100 CENTS

Shawmut First County Bank, N.A. Brockton, Massachusetts 02403

LIQUID INVESTMENT ACCOUNT

MEMO reimb. xp - phone, food Mary Lou Butler

:011301507: 104113059 6 0103 000001 6530

STUDD'S TRUST NO. 104

Oct. 6 19 83 63-150/113

PAY TO THE ORDER OF Robert A. Pickman $ 238.45

Two Hundred and thirty-eight DOLLARS 45/100 CENTS

Shawmut First County Bank, N.A. Brockton, Massachusetts 02403

LIQUID INVESTMENT ACCOUNT

MEMO r.e. office exp., phone, postage Mary Lou Butler

:011301507: 104113059 6 0104 000002 3845

STUDD'S TRUST

NO. 105

Nov. 3 19 83

53-150/113

PAY TO THE ORDER OF Robert Nickerson $ 167.40

One Hundred and Sixty-seven 40/100 DOLLARS CENTS

Shawmut
First County Bank, N.A.
Brockton, Massachusetts 02403

LIQUID INVESTMENT ACCOUNT

MEMO

Mary Lou Butler

:011301507: "104130596" 0105 "0000016740"

STUDD'S TRUST

NO. 106

Nov. 3 19 83

53-150/113

PAY TO THE ORDER OF Scott Lejura, Inc. $ 130.59

One Hundred and thirty —— DOLLARS 59/100 CENTS

Shawmut
First County Bank, N.A.
Brockton, Massachusetts 02403

LIQUID INVESTMENT ACCOUNT

MEMO

Mary Lou Butler

:011301507: "104130596" 0106 "0000013059"

STUDD'S TRUST NO. 107

12-21-83 Dec 22 1983

53-150/113

PAY TO THE ORDER OF Mary Low Butler $ 196.35

One thousand, one hundred ninety six 35/100 DOLLARS CENTS

Shawmut First County Bank, N.A. Brockton, Massachusetts 02403

LIQUID INVESTMENT ACCOUNT

MEMO

Mary Low Butler

:011301507: 104113059 6" 0107 "0000019635"

1 2 2 3

STUDD'S TRUST NO. 108

12-23-83 Dec 12 1983

53-150/113

PAY TO THE ORDER OF Mahoney, Hawkes & Goldings $ 8,000.00

Eight Thousand DOLLARS 00/100 CENTS

Shawmut First County Bank, N.A. Brockton, Massachusetts 02403

LIQUID INVESTMENT ACCOUNT

MEMO legal fees

Mary Low Butler

:011301507: 104113059 6" 0108 "0000800000"

1 2 2 3

STUDD'S TRUST NO. 110

03-07-84 Feb 29 1984

53-150/113

PAY TO THE ORDER OF Mahoney, Hawkes & Goldings $ 12,309.52

Twelve Thousand, three hundred nine DOLLARS 52/100 CENTS

Shawmut First County Bank, N.A. Brockton, Massachusetts 02403

LIQUID INVESTMENT ACCOUNT

MEMO

Mary Low Butler

:011301507: 104113059 6" 0110 "0001230952"

STUDD'S TRUST

NO. 111

March 6 19 84

53-150/113

PAY TO THE ORDER OF Maloney Hawker - Golding $ 7,000.00

Seven Thousand ——— DOLLARS 00 CENTS

Shawmut
First County Bank, N.A.
Brockton, Massachusetts 02403

LIQUID INVESTMENT ACCOUNT

MEMO

Mary Lou Butler

:011301507: "1041305 9 6" 0111 "0000700000"

STUDD'S TRUST

NO. 113

April 2 19 84

53-150/113

PAY TO THE ORDER OF Maloney, Hawker - Golding $ 3,177.00

Three Thousand ——— 00/100 DOLLARS 00 CENTS

Shawmut
First County Bank, N.A.
Brockton, Massachusetts 02403

LIQUID INVESTMENT ACCOUNT

MEMO

Mary Lou Butler

:011301507: "1041305 9 6" 0113 "0000300000"

CASHIER'S CHECK

Shawmut
First County Bank, N.A.
90 Main Street, Brockton, Massachusetts 02403

CUSTOMER COPY

010491 53-150/113

Date 5-2-1984

PAY TO THE ORDER OF Human Rights Campaign Fund********** $ 1,000.00

NON-NEGOTIABLE

AUTHORIZED SIGNATURE

8:0113015071: "104113059 6" 0118 "0000046300"

STUDD'S TRUST 118

May 16 '84 53-150/113

PAY TO THE ORDER OF Human Rights Campaign Fund 463.00

Four Hundred and Sixty six 00/100 DOLLARS

Shawmut
First County Bank, N.A.
Brockton, Massachusetts 02403

LIQUID INVESTMENT ACCOUNT

MEMO

Mary Sue Beattie

8:0113015071: "104113059 6" 0118 "0000030500"

Comm 4RE1M 00 1001654

STUDD'S TRUST 119

June 18 '84 53-150/113

PAY TO THE ORDER OF Human Rights Campaign Fund 305.00

Three Hundred and five 00/100 DOLLARS

Shawmut
First County Bank, N.A.
Brockton, Massachusetts 02403

LIQUID INVESTMENT ACCOUNT

MEMO

Mary Sue Beattie

STUDD'S TRUST

114

Copies 2 of

53-150/113

Hand Disclamper

76.60

Seventy-six and [redacted] sixty

Shawmut
First County Bank, N.A.
Brockton, Massachusetts 02403

LIQUID INVESTMENT ACCOUNT

thank you cards

Mary Fre Sutton

⑆011301507⑆ ⑈104113059 6⑈ 0114 ⑈0000007660⑈

3504054473 4

STUDD'S TRUST 4097202[illegible]58 112

March 28 19 84 53-150/113,

PAY TO THE ORDER OF Commonwealth of Massachusetts $ 14.31

Fourteen ——— DOLLARS 31/100 CENTS

Shawmut First County Bank, N.A. Brockton, Massachusetts 02403

LIQUID INVESTMENT ACCOUNT

MEMO

Mary Lou Butler

⑆011301507⑆ ⑈104113059 6⑈ 0112 ⑈0000014316⑈

STUDD'S TRUST 115

April 9 19 84 53-150/113,

PAY TO THE ORDER OF Postmaster $ 130.00

One-hundred and thirty ——— DOLLARS None CENTS

Shawmut First County Bank, N.A. Brockton, Massachusetts 02403

LIQUID INVESTMENT ACCOUNT

MEMO

Mary Lou Butler

⑆011301507⑆ ⑈104113059 6⑈ 0115 ⑈0000013000⑈

STUDD'S TRUST 109

Jan 11 19 84 53-150/113,

PAY TO THE ORDER OF Postmaster - Norwell $ 26 80

Twenty-six ——— DOLLARS 80/100 CENTS

Shawmut First County Bank, N.A. Brockton, Massachusetts 02403

LIQUID INVESTMENT ACCOUNT

MEMO 13 stamps

Mary Lou Butler

⑆011301507⑆ ⑈104113059 6⑈ 0109 ⑈0000002680⑈

STUDD'S TRUST 116

April 17 84 53-150/113,

PAY TO THE ORDER OF Stephanie Tormey $ 7.80

Seven ——— DOLLARS 80/100 CENTS

Shawmut First County Bank, N.A. Brockton, Massachusetts 02403

LIQUID INVESTMENT ACCOUNT

MEMO 2 - stamps

Mary Lou Butler

⑆011301507⑆ ⑈104113059 6⑈ 0116 ⑈0000000780⑈

⑆011301507⑆ 3504054473 5

Department of the Treasury
Internal Revenue Service

Date of This Notice

08242683

If you inquire about your account, please refer to this number or attach a ▶ copy of this notice

10-13-83
Employer Identification Number
04-6495262

GERRY E STUDDS LEGAL SERVICES TRUST
STUDDS TRUST
MARY LOU BUTLER TR
38 ROSAS LA
SCITUATE MA 02066

575 B 555555155
55555555

NOTICE OF NEW EMPLOYER IDENTIFICATION NUMBER ASSIGNED

Thank you for your application for an employer identification number. The number above has been assigned to you. We will use it to identify your business tax returns and any other related documents, even if you have no employees.

Please keep this number in your permanent records. Use the number and your name, exactly as shown above, on all Federal tax forms that require this information, and refer to the number in all tax payments and in tax-related correspondence or documents. You may wish to make a record of the number for reference in case this notice is lost or destroyed.

Note that the assignment of this number does not grant tax-exempt status to nonprofit organizations. For details on how to apply for this exemption, see IRS Publication 557, Tax-Exempt Status for Your Organization, available at most IRS offices.

We appreciate your cooperation.

Form 5372 (Rev. 11-81)

8504054736
U.S. GOVERNMENT PRINTING OFFICE: 1982-381-978/7532 E.I. NO. 36-2795541



Shawmut
First County Bank, N.A.
90 Main St., Brockton, MA 02403
BANK NUMBER 011301501

STATEMENT OF ACCOUNT

ACCOUNT NUMBER 10-413-059-6
NO. OF ITEMS 8

STUDDS TRUST
38 ROSA'S LANE
SCITUATE MA 02066

STATEMENT DATE 09/16/83
CYCLE DAYS

DATE OF LAST STATEMENT

SUMMARY OF NEW BALANCES			NOW AND SAVINGS INTEREST SUMMARY	
CHECKING OR NOW	SUPERCHECK	SAVINGS	PAID TO DATE THIS YEAR	TAXPAYER ID NUMBER
14,520.00			.00	

SUPERCHECK SUMMARY					
AVERAGE DAILY BALANCE	DAILY PERIODIC RATE	FINANCE CHARGE	ANNUAL PERCENTAGE RATE	AVAILABLE CREDIT	PAYMENT AMOUNT AND DATE DUE

CHECKS PAID OR DEBITS	DEPOSITS OR PAYMENTS	POSTING DATE	BALANCES
LIQUID INVESTMENT ACCOUNT 10-413-059-6 PREVIOUS BALANCE			.00
	1,960.00	09/14	1,960.00
	12,560.00	09/14	14,520.00
THE ANNUAL INTEREST RATE IS 08.1000% AS OF 09/14/83			
WEEKLY RATE CHANGE THE ANNUAL INTEREST RATE IS 5.25% WHILE YOUR BALANCE REMAINS BELOW $ 2,500.00			

8504054737

NOTICE: SEE REVERSE SIDE AND ACCOMPANYING STATEMENT(S) FOR IMPORTANT INFORMATION.
SEE ACCOMPANYING NOTICES FOR ADDITIONAL DETAILS ABOUT CERTAIN ELECTRONIC TRANSFERS TO OR FROM YOUR ACCOUNT(S).

Shawmut First County Bank, N.A.
90 Main St., Brockton, MA 02403
BANK NUMBER 01130150

STATEMENT OF ACCOUNT

ACCOUNT NUMBER 413-059-6
NO. OF ITEMS 3

STUDUS TRUST
38 ROSA'S LANE
SCITUATE MA 02066

STATEMENT DATE 10/18/83
CYCLE DAYS

DATE OF LAST STATEMENT 09/16

SUMMARY OF NEW BALANCES			NOW AND SAVINGS INTEREST SUMMARY	
CHECKING OR NOW	SUPERCHECK	SAVINGS	PAID TO DATE THIS YEAR	TAXPAYER ID NUMBER
8,724.98			93.73	046-49-5262

SUPERCHECK SUMMARY				
AVERAGE DAILY BALANCE	DAILY PERIODIC RATE	FINANCE CHARGE ANNUAL PERCENTAGE RATE	AVAILABLE CREDIT	PAYMENT AMOUNT AND DATE DUE

	CHECKS PAID OR DEBITS	DEPOSITS OR PAYMENTS	POSTING DATE	BALANCES
	LIQUID INVESTMENT ACCOUNT 16-413-059-6	PREVIOUS BALANCE		14,520.00
		225.00 ✓	09/19	14,745.00
		17.58IN	09/19	14,762.58
	THE ANNUAL INTEREST RATE IS 05.1000% AS OF 09/19/83			
		100.00	09/22	14,862.58
		235.00 ✓	09/22	15,097.58
		165.00 ✓	09/23	15,262.58
		275.00 ✓	09/26	15,537.58
		23.36IN	09/26	15,560.94
	THE ANNUAL INTEREST RATE IS 05.1000% AS OF 09/26/83			
9	THE ANNUAL INTEREST RATE IS 05.2500% AS OF 09/27/83			
3		160.00 ✓	09/29	15,720.94
		185.00 ✓	09/29	15,905.94
		175.00 ✓	09/30	16,080.94
7		25.10IN	10/03	16,106.04
	THE ANNUAL INTEREST RATE IS 05.2500% AS OF 10/03/83			
4		195.00 ✓	10/04	16,301.04
	THE ANNUAL INTEREST RATE IS 05.1500% AS OF 10/04/83			
		85.00 ✓	10/05	16,386.04
4	10,000.00 ✓		10/06	6,386.04
		265.00 ✓	10/07	6,651.04
5		1,890.00 ✓	10/07	8,541.04
		14.51IN	10/07	8,555.55
0	THE ANNUAL INTEREST RATE IS 05.1500% AS OF 10/07/83			
4	238.45 ✓		10/11	8,317.10
	THE ANNUAL INTEREST RATE IS 05.1000% AS OF 10/11/83			
		260.00 ✓	10/12	8,577.10
		300.00 ✓	10/17	8,877.10
0	165.30 ✓		10/17	8,711.80
		13.18IN	10/17	8,724.98
5	THE ANNUAL INTEREST RATE IS 05.1000% AS OF 10/17/83			
8				
	WEEKLY RATE CHANGE THE ANNUAL INTEREST RATE IS 5.25% WHILE YOUR BALANCE REMAINS BELOW $ 2,500.00			

NOTICE: SEE REVERSE SIDE AND ACCOMPANYING STATEMENT(S) FOR IMPORTANT INFORMATION
SEE ACCOMPANYING NOTICES FOR ADDITIONAL DETAILS ABOUT CERTAIN ELECTRONIC TRANSFERS TO OR FROM YOUR ACCOUNT(S)

Shawmut
First County Bank, N.A.
90 Main St., Brockton, MA 02403
BANK NUMBER 011300150

STATEMENT OF ACCOUNT

ACCOUNT NUMBER
3-059-6

STUDDS TRUST
38 RUSA'S LANE
SCITUATE MA 02066

STATEMENT DATE
11/16/83

CYCLE DAYS

DATE OF LAST STATEMENT
10/18

SUMMARY OF NEW BALANCES			NOW AND SAVINGS INTEREST SUMMARY	
CHECKING OR NOW	SUPERCHECK	SAVINGS	PAID TO DATE THIS YEAR	TAXPAYER ID. NUMBER
9,093.51			148.57	046-49-5262

SUPERCHECK SUMMARY				
AVERAGE DAILY BALANCE	DAILY PERIODIC RATE	FINANCE CHARGE / ANNUAL PERCENTAGE RATE	AVAILABLE CREDIT	PAYMENT AMOUNT AND DATE DUE

CHECKS PAID OR DEBITS	DEPOSITS OR PAYMENTS	POSTING DATE	BALANCES
QUID INVESTMENT ACCOUNT 10-413-059-6		PREVIOUS BALANCE	8,724.98
	25.00	10/20	8,749.98
	13.58IN	10/24	8,763.56
E ANNUAL INTEREST RATE IS 08.1000% AS OF 10/24/83			
E ANNUAL INTEREST RATE IS 08.0000% AS OF 10/25/83			
3.32		10/26	8,760.24
	120.00	10/28	8,880.24
	200.00	10/31	9,080.24
	13.48IN	10/31	9,093.72
E ANNUAL INTEREST RATE IS 08.0000% AS OF 10/31/83			
	20.00	11/02	9,113.72
	150.00	11/04	9,263.72
	14.01IN	11/07	9,277.73
E ANNUAL INTEREST RATE IS 08.0000% AS OF 11/07/83			
	100.00	11/08	9,377.73
167.40		11/08	9,210.33
E ANNUAL INTEREST RATE IS 07.9000% AS OF 11/08/83			
130.59		11/09	9,079.74
	13.77IN	11/14	9,093.51
E ANNUAL INTEREST RATE IS 07.9000% AS OF 11/14/83			
WEEKLY RATE CHANGE			
THE ANNUAL INTEREST RATE IS 5.25% WHILE YOUR BALANCE REMAINS			
BELOW $ 2,500.00			

NOTICE: SEE REVERSE SIDE AND ACCOMPANYING STATEMENT(S) FOR IMPORTANT INFORMATION
ACCOMPANYING NOTICE(S) FOR ADDITIONAL DETAILS ABOUT CERTAIN ELECTRONIC TRANSFERS TO OR FROM YOUR ACCOUNT(S)

Shawmut
First County Bank, N.A.
90 Main St., Brockton, MA 02403
BANK NUMBER 011301501

STATEMENT OF ACCOUNT

ACCOUNT NUMBER 13-[illegible]-5
NO. OF ITEMS 0

STUDDS TRUST
38 ROSA'S LANE
SCITUATE MA 02066

STATEMENT DATE 12/15/83
CYCLE DAYS

DATE OF LAST STATEMENT 11/15

SUMMARY OF NEW BALANCES

CHECKING OR NOW	SUPERCHECK	SAVINGS
9,299.12		

NOW AND SAVINGS INTEREST SUMMARY

PAID TO DATE THIS YEAR	TAXPAYER ID NUMBER
204.15	04-6445262

SUPERCHECK SUMMARY

AVERAGE DAILY BALANCE	DAILY PERIODIC RATE	FINANCE CHARGE	ANNUAL PERCENTAGE RATE	AVAILABLE CREDIT	PAYMENT AMOUNT AND DATE DUE

CHECKS PAID OR DEBITS	DEPOSITS OR PAYMENTS	POSTING DATE	BALANCES
GOLD INVESTMENT ACCOUNT 10-413-059-6		PREVIOUS BALANCE	9,093.51
	13.71-IN	11/21	9,107.22
THE ANNUAL INTEREST RATE IS 07.9000% AS OF 11/21/83			
	150.00	11/28	9,257.22
	13.80IN	11/28	9,271.02
THE ANNUAL INTEREST RATE IS 07.9000% AS OF 11/28/83			
	14.05IN	12/05	9,285.14
THE ANNUAL INTEREST RATE IS 07.9000% AS OF 12/05/83			
THE ANNUAL INTEREST RATE IS 07.8500% AS OF 12/05/83			
	13.98IN	12/12	9,299.12
THE ANNUAL INTEREST RATE IS 07.8500% AS OF 12/12/83			
THE ANNUAL INTEREST RATE IS 08.0000% AS OF 12/13/83			
WEEKLY RATE CHANGE			
THE ANNUAL INTEREST RATE IS 7.85% WHILE YOUR BALANCE REMAINS BELOW $ 2,500.00			

8504054479

NOTICE SEE REVERSE SIDE AND ACCOMPANYING STATEMENT(S) FOR IMPORTANT INFORMATION.
ACCOMPANYING NOTICES FOR ADDITIONAL DETAILS ABOUT CERTAIN ELECTRONIC TRANSFERS TO OR FROM YOUR ACCOUNT(S)

Shawmut
First County Bank, N.A.
90 Main St., Brockton, MA 02403
BANK NUMBER 01130150

STATEMENT OF ACCOUNT

ACCOUNT NUMBER 10-413-059-6

SIUDUS IRUST
38 RUSA'S LANE
SCITUATE MA 02066

NO. OF ITEMS 9

STATEMENT DATE 01/17/84

CYCLE DAYS

DATE OF LAST STATEMENT 12/15

SUMMARY OF NEW BALANCES

CHECKING OR NOW	SUPERCHECK	SAVINGS
1,110.35		

NOW AND SAVINGS INTEREST SUMMARY

PAID TO DATE THIS YEAR	TAXPAYER ID NUMBER
2.26	04-6495202

SUPERCHECK SUMMARY

AVERAGE DAILY BALANCE	DAILY PERIODIC RATE	FINANCE CHARGE	ANNUAL PERCENTAGE RATE	AVAILABLE CREDIT	PAYMENT AMOUNT AND DATE DUE

CHECKS PAID OR DEBITS	DEPOSITS OR PAYMENTS	POSTING DATE	BALANCES
LIQUID INVESTMENT ACCOUNT 10-413-059-6	PREVIOUS	BALANCE	9,299.12
	14.21N	12/19	9,313.33
YE ANNUAL INTEREST RATE IS 08.00004 AS OF 12/19/83			
YE ANNUAL INTEREST RATE IS 08.00004 AS OF 12/20/83			
196.35 -		12/21	9,117.04
8,000.00 -		12/23	1,117.04
	8.72IN	12/23	1,125.76
YE ANNUAL INTEREST RATE IS 05.25004 AS OF 12/23/83			
	1.13IN	12/30	1,126.89
YE ANNUAL INTEREST RATE IS 05.25004 AS OF 12/30/83			
	10.00	01/06	1,136.89
	1.13IN	01/09	1,138.02
YE ANNUAL INTEREST RATE IS 05.25004 AS OF 01/09/84			
26.80 -		01/13	1,104.22
	1.13IN	01/16	1,110.35
YE ANNUAL INTEREST RATE IS 05.25004 AS OF 01/16/84			
WEEKLY RATE CHANGE			
THE ANNUAL INTEREST RATE IS 5.25% WHILE YOUR BALANCE REMAINS			
BELOW $ 2,500.00			

8504054741

NOTICE: SEE REVERSE SIDE AND ACCOMPANYING STATEMENT(S) FOR IMPORTANT INFORMATION
ACCOMPANYING NOTICES FOR ADDITIONAL DETAILS ABOUT CERTAIN ELECTRONIC TRANSFERS TO OR FROM YOUR ACCOUNT(S)



Shawmut
First County Bank, N.A.
90 Main St., Brockton, MA 02403
BANK NUMBER 01130150

STATEMENT OF ACCOUNT

ACCOUNT NUMBER
13-059-6

NO. OF ITEMS
0

STUDDS TRUST
38 KOSA'S LANE
SCITUATE MA 02066

STATEMENT DATE
02/15/84

CYCLE DAYS

DATE OF LAST STATEMENT
01/17

SUMMARY OF NEW BALANCES

CHECKING OR NOW	SUPERCHECK	SAVINGS
7,311.73		

NOW AND SAVINGS INTEREST SUMMARY

PAID TO DATE THIS YEAR	TAXPAYER ID NUMBER
6.90	04-6495262

SUPERCHECK SUMMARY

AVERAGE DAILY BALANCE	DAILY PERIODIC RATE	FINANCE CHARGE	ANNUAL PERCENTAGE RATE	AVAILABLE CREDIT	PAYMENT AMOUNT AND DATE DUE

CHECKS PAID OR DEBITS	DEPOSITS OR PAYMENTS	POSTING DATE	BALANCES
LIQUID INVESTMENT ACCOUNT 10-413-059-6		PREVIOUS BALANCE	1,110.35
	1.12IN	01/23	1,111.47
HE ANNUAL INTEREST RATE IS 05.2500% AS OF 01/23/84			
	40.00	01/30	1,151.47
	1.12IN	01/30	1,152.59
HE ANNUAL INTEREST RATE IS 05.2500% AS OF 01/30/84			
	1.16IN	02/06	1,153.75
HE ANNUAL INTEREST RATE IS 05.2500% AS OF 02/06/84			
	6,156.74	02/13	7,310.49
	1.24IN	02/13	7,311.73
HE ANNUAL INTEREST RATE IS 08.0000% AS OF 02/13/84			
HE ANNUAL INTEREST RATE IS 08.0500% AS OF 02/14/84			
WEEKLY RATE CHANGE			
THE ANNUAL INTEREST RATE IS 5.25% WHILE YOUR BALANCE REMAINS BELOW $ 2,500.00			

8504054474 2

NOTICE: SEE REVERSE SIDE AND ACCOMPANYING STATEMENT(S) FOR IMPORTANT INFORMATION
ACCOMPANYING NOTICES FOR ADDITIONAL DETAILS ABOUT CERTAIN ELECTRONIC TRANSFERS TO OR FROM YOUR ACCOUNT(S)

Shawmut
First County Bank, N.A.
90 Main St., Brockton, MA 02403
BANK NUMBER 01130160

STATEMENT OF ACCOUNT

ACCOUNT NUMBER
13-059-0

NO. OF ITEMS
2

STUDDS TRUST
3M ROSA'S LANE
SCITUATE MA 02066

STATEMENT DATE
03/15/84

CYCLE DAYS

DATE OF LAST STATEMENT
02/15

SUMMARY OF NEW BALANCES			NOW AND SAVINGS INTEREST SUMMARY	
CHECKING OR NOW	SUPERCHECK	SAVINGS	PAID TO DATE THIS YEAR	TAXPAYER ID NUMBER
1,270.93			68.23	04-6082262

SUPERCHECK SUMMARY					
AVERAGE DAILY BALANCE	DAILY PERIODIC RATE	FINANCE CHARGE	ANNUAL PERCENTAGE RATE	AVAILABLE CREDIT	PAYMENT AMOUNT AND DATE DUE

CHECKS PAID OR DEBITS	DEPOSITS OR PAYMENTS	POSTING DATE	BALANCES
JNEY MARKET DEPOSIT ACCT 10-413-059-0	PREVIOUS BALANCE	02/17	7,311.73
	11.29IN	02/17	7,323.02
HE ANNUAL INTEREST RATE IS 08.0	000% AS OF 02/17/84		
	6,813.00	02/21	14,136.02
	20.33IN	02/27	14,156.35
HE ANNUAL INTEREST RATE IS 08.0	000% AS OF 02/21/84		
	1,222.89	03/05	15,379.24
	21.85IN	03/05	15,401.09
HE ANNUAL INTEREST RATE IS 08.0	000% AS OF 03/05/84		
	5,171.50	03/06	20,572.59
HE ANNUAL INTEREST RATE IS 08.1	000% AS OF 03/06/84		
12,309.52		03/07	8,263.07
7,000.00		03/09	1,263.07
HE ANNUAL INTEREST RATE IS 05.2	000% AS OF 03/09/84		
	7.86IN	03/12	1,270.93
HE ANNUAL INTEREST RATE IS 05.2	000% AS OF 03/12/84		

WEEKLY RATE CHANGE
THE ANNUAL INTEREST RATE IS 5.25% WHILE YOUR BALANCE REMAINS BELOW $ 2,500.00

8504054743

NOTICE: SEE REVERSE SIDE AND ACCOMPANYING STATEMENT(S) FOR IMPORTANT INFORMATION
ACCOMPANYING NOTICES FOR ADDITIONAL DETAILS ABOUT CERTAIN ELECTRONIC TRANSFERS TO OR FROM YOUR ACCOUNT(S)

Shawmut First County Bank, N.A.
90 Main St., Brockton, MA 02403
BANK NUMBER 011301500

STATEMENT OF ACCOUNT

ACCOUNT NUMBER
13-059-6
OF ITEMS
4

STUDDS TRUST
38 ROSA'S LANE
SCITUATE MA 02066

STATEMENT DATE
04/17/84
CYCLE DAYS

DATE OF LAST STATEMENT
03/15

SUMMARY OF NEW BALANCES			NOW AND SAVINGS INTEREST SUMMARY	
CHECKING OR NOW	SUPERCHECK	SAVINGS	PAID TO DATE THIS YEAR	TAXPAYER ID NUMBER
550.42			81.63	04-6495262

SUPERCHECK SUMMARY					
AVERAGE DAILY BALANCE	DAILY PERIODIC RATE	FINANCE CHARGE	ANNUAL PERCENTAGE RATE	AVAILABLE CREDIT	PAYMENT AMOUNT AND DATE DUE

CHECKS PAID OR DEBITS	DEPOSITS OR PAYMENTS	POSTING DATE	BALANCES
UNEY MARKET DEPOSIT ACCT 10-413-059-6	PREVIOUS BALANCE		1,270.93
	1.28IN	03/19	1,272.21
HE ANNUAL INTEREST RATE IS 05.2500% AS OF 03/19/84			
	1.28IN	03/26	1,273.49
HE ANNUAL INTEREST RATE IS 05.2500% AS OF 03/26/84			
	2,487.00 /	04/02	3,760.49
	1.40IN	04/02	3,761.89
HE ANNUAL INTEREST RATE IS 08.6000% AS OF 04/02/84			
HE ANNUAL INTEREST RATE IS 09.0000% AS OF 04/03/84			
76.60		04/09	3,685.29
	6.47IN	04/09	3,691.76
E ANNUAL INTEREST RATE IS 09.0000% AS OF 04/09/84			
14.31		04/11	3,677.45
130.00		04/11	3,547.45
3,000.00		04/13	547.45
	2.97IN	04/13	550.42
E ANNUAL INTEREST RATE IS 05.2500% AS OF 04/13/84			
WEEKLY RATE CHANGE THE ANNUAL INTEREST RATE IS 5.25% WHILE YOUR BALANCE REMAINS BELOW $ 2,500.00			

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OTICE: SEE REVERSE SIDE AND ACCOMPANYING STATEMENT(S) FOR IMPORTANT INFORMATION.
ACCOMPANYING NOTICES FOR ADDITIONAL DETAILS ABOUT CERTAIN ELECTRONIC TRANSFERS TO OR FROM YOUR ACCOUNT(S)

Shawmut
First County Bank, N.A.
90 Main St., Brockton, MA 02403
BANK NUMBER 011300150

STATEMENT OF ACCOUNT

ACCOUNT NUMBER 413-059-6
NO. OF ITEMS 2

STUDDS TRUST
38 ROSA'S LANE
SCITUATE MA 02066

STATEMENT DATE 05/02/84
CYCLE DAYS

DATE OF LAST STATEMENT 04/17

SUMMARY OF NEW BALANCES			NOW AND SAVINGS INTEREST SUMMARY	
CHECKING OR NOW	SUPERCHECK	SAVINGS	PAID TO DATE THIS YEAR	TAXPAYER ID. NUMBER
.00			83.04	04-6495262

SUPERCHECK SUMMARY					
AVERAGE DAILY BALANCE	DAILY PERIODIC RATE	FINANCE CHARGE	ANNUAL PERCENTAGE RATE	AVAILABLE CREDIT	PAYMENT AMOUNT AND DATE DUE

CHECKS PAID OR DEBITS	DEPOSITS OR PAYMENTS	POSTING DATE	BALANCES
MONEY MARKET DEPOSIT ACCT 10-413-059-6	PREVIOUS BALANCE		550.42
	.55IN	04/23	550.97
THE ANNUAL INTEREST RATE IS 05.2500% AS OF 04/23/84			
	440.00	04/25	990.97
	70.00	04/30	1,060.97
	.86IN	04/30	1,061.83
THE ANNUAL INTEREST RATE IS 05.2500% AS OF 04/30/84			
7.80		05/01	1,054.03
1,054.03		05/02	.00
WEEKLY RATE CHANGE THE ANNUAL INTEREST RATE IS 5.25% WHILE YOUR BALANCE REMAINS BELOW $ 2,500.00			

NOTICE: SEE REVERSE SIDE AND ACCOMPANYING STATEMENT(S) FOR IMPORTANT INFORMATION
SEE ACCOMPANYING NOTICES FOR ADDITIONAL DETAILS ABOUT CERTAIN ELECTRONIC TRANSFERS TO OR FROM YOUR ACCOUNT(S)

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Shawmut
First County Bank, N.A.
90 Main St., Brockton, MA 02403
BANK NUMBER 01130150

STATEMENT OF ACCOUNT

ACCOUNT NUMBER
13-059-6

ITEMS
0

STUDDS TRUST
38 ROSA'S LANE
SCITUATE MA 02066

STATEMENT DATE
05/15/84
CYCLE DAYS

DATE OF LAST STATEMENT
05/02

SUMMARY OF NEW BALANCES

CHECKING OR NOW	SUPERCHECK	SAVINGS
517.53		

NOW AND SAVINGS INTEREST SUMMARY

PAID TO DATE THIS YEAR	TAXPAYER ID. NUMBER
33.56	06-6695762

SUPERCHECK SUMMARY

AVERAGE DAILY BALANCE	DAILY PERIODIC RATE	FINANCE CHARGE	ANNUAL PERCENTAGE RATE	AVAILABLE CREDIT	PAYMENT AMOUNT AND DATE DUE

CHECKS PAID OR DEBITS	DEPOSITS OR PAYMENTS	POSTING DATE	BALANCES
MONEY MARKET DEPOSIT ACCT 13-059-6 PREVIOUS		BALANCE	.00
	54.03	05/04	54.03
	.181N	05/07	54.21
THE ANNUAL INTEREST RATE IS 05.250% AS OF 05/07/84			
	463.00	05/13	517.21
	.32IN	05/14	517.53
THE ANNUAL INTEREST RATE IS 05.25[illegible]% AS OF 05/14/84			
WEEKLY RATE CHANGE			
THE ANNUAL INTEREST RATE IS 5.25% WHILE YOUR BALANCE REMAINS BELOW $ 2,500.00			

8504054477 46

NOTICE: SEE REVERSE SIDE AND ACCOMPANYING STATEMENT(S) FOR IMPORTANT INFORMATION
ACCOMPANYING NOTICES FOR ADDITIONAL DETAILS ABOUT CERTAIN ELECTRONIC TRANSFERS TO OR FROM YOUR ACCOUNT(S)

Shawmut Banks

STATEMENT OF ACCOUNT

DIRECT INQUIRIES TO
SHAWMUT FIRST COUNTY BANK, N.A.
BRANCH 006
PO BOX 972
BROCKTON MA 02403

(617) 586-5500

ACCOUNT NUMBER
413-059-6

TAXPAYER ID NUMBER
04-6495262

STATEMENT PERIOD
05/15/84 THRU 06/15/84

PREPARED FOR
STUDDS TRUST
38 ROSA'S LANE
SCITUATE MA 02066

1 ENCLOSED ITEM

**********HERE IS YOUR NEW STATEMENT!**********
NOW YOUR PAID CHECKS ARE LISTED IN NUMERICAL ORDER TO MAKE BALANCING YOUR CHECKBOOK FASTER AND EASIER THAN EVER.

ACCOUNT SUMMARY

200471

TYPE OF ACCOUNT	BEGINNING BALANCE	CHECKS/ DEBITS	DEPOSITS/ CREDITS	ENDING BALANCE
MONEY MARKET DEP	517.53	463.00	305.83	360.36

ACCOUNT ACTIVITY

MONEY MARKET DEPOSIT ACCOUNT IO-413-059-6

******CHECKS******

NUMBER	DATE	AMOUNT	NUMBER	DATE	AMOUNT
118	05/24	463.00			

1 CHECK TOTALING 463.00

******OTHER DEBITS******

NONE

******DEPOSITS/CREDITS******

	DATE	AMOUNT
INTEREST PAID	05/21	.52
INTEREST PAID	05/25	.19
INTEREST PAID	06/04	.06
INTEREST PAID	06/11	.06
DEPOSIT	06/12	305.00

5 DEPOSITS/CREDITS TOTALING 305.83

INTEREST PAID YEAR TO DATE 84.37

THE INTEREST PAID TO YOUR ACCOUNT WILL BE 5.2500% WHENEVER BALANCE FALLS BELOW $2,500.00

DAILY BALANCE

DATE	ENDING BALANCE
05/21	518.05
05/24	55.05
05/25	55.24
06/04	55.30
06/11	55.36
06/12	360.36

Shawmut Banks

STATEMENT OF ACCOUNT

DIRECT INQUIRIES TO
SHAWMUT FIRST COUNTY BANK, N.A.
BRANCH 006
PO BOX 972
BROCKTON MA 02403

(617) 586-5500

ACCOUNT NUMBER
413-059-6

TAXPAYER ID NUMBER
04-6495262

STATEMENT PERIOD
06/15/84 THRU 07/17/84

1 ENCLOSED ITEM

PREPARED FOR
STUDDS TRUST
38 ROSA'S LANE
SCITUATE MA 02066

SHAWMUT OFFERS A VARIETY OF SAVINGS AND INVESTMENT PLANS DESIGNED TO SUIT YOUR GOALS AND NEEDS. FOR MORE INFORMATION CALL 1-800-SHAWMUT OR ASK YOUR PERSONAL BANKER.

200385

ACCOUNT SUMMARY

TYPE OF ACCOUNT	BEGINNING BALANCE	CHECKS/ DEBITS	DEPOSITS/ CREDITS	ENDING BALANCE
MONEY MARKET DEP	360.36	305.00	.52	55.88

ACCOUNT ACTIVITY

MONEY MARKET DEPOSIT ACCOUNT 10-413-059-6

******CHECKS******

NUMBER	DATE	AMOUNT	NUMBER	DATE	AMOUNT
119	06/18	305.00			

1 CHECK TOTALING 305.00

******OTHER DEBITS******

NONE

******DEPOSITS/CREDITS******

	DATE	AMOUNT
INTEREST PAID	06/18	.28
INTEREST PAID	06/25	.06
INTEREST PAID	07/02	.06
INTEREST PAID	07/09	.06
INTEREST PAID	07/16	.06

5 DEPOSITS/CREDITS TOTALING .52

INTEREST PAID YEAR TO DATE 84.89

THE INTEREST PAID TO YOUR ACCOUNT WILL BE 5.2500% WHENEVER BALANCE FALLS BELOW $2,500.00

DAILY BALANCE

DATE	ENDING BALANCE
06/18	55.64
06/25	55.70
07/02	55.76
07/09	55.82
07/16	55.88

Village Plaza
234 Church St
, MA 02359

3 5 0 4 0 5 4 4 7 4 9

AUG 16 1984

AUG 84

AUG 94

9 9

AUG 20 AM 10:36

FROM: Butler
Studds for Congress
Stanton Village Plaza
Rte 131 234 Church St
Pembroke MA 02359

Customer Number, if any:

TO: McKenneth A Gross
Associate General Counsel
1325 K St NW

EXPRESS MAIL
NEXT DAY SERVICE

POST OFFICE TO ADDRESSEE

ORIGIN

B32579701

DESTINATION

DELIVERY WAS ATTEMPTED

Date

Time

Weight

EXPRESS MAIL SERVICE

▼ TO REMOVE PEEL BACK HERE

MOVE copies 1 & 2 with this strip
Postal Service Personnel Only)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 31, 1984

Peter Y. Flynn
Obery Heights
Plymouth, Massachusetts 02360

Dear Mr. Flynn:

This letter is to acknowledge receipt of your complaint which we received on July 24, 1984, against Edwin M. Martin, Jr.; The Committee to Re-Elect Congressman Studds; Victor J. Basile; and Human Rights Campaign Fund, which alleges violations of the Federal Election Campaign laws. A staff member has been assigned to analyze your allegations. The respondent will be notified of this complaint within five days.

You will be notified as soon as the Commission takes final action on your complaint. Should you have or receive any additional information in this matter, please forward it to this office. We suggest that this information be sworn to in the same manner as your original complaint. For your information, we have attached a brief description of the Commission's procedure for handling complaints. If you have any questions, please contact Barbara A. Johnson at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

By Kenneth A. Gross
Associate General Counsel

Enclosure

8504047 50

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 31, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Victor J. Basile
Treasurer
Human Rights Campaign Fund
713 D Street, N.E.
Washington, D.C. 20003

Re: MUR 1744

Dear Mr. Basile:

This letter is to notify you that on July 24, 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 1744. 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.

8504054475 1

If you have any questions, please contact Lois Lerner, 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

8504047552

MUR 1744 LERNER

PS Form 3811, Dec. 1980

● 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: Victor J. Basile Treasurer
Human Rights Campaign Fund
713 D Street SE
Wash DC 20003

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

ARTICLE NUMBER
943283

(Always obtain signature of addressee or agent)

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

5. DATE OF DELIVERY AUG 16 1984
POSTMARK
AUG 16 1984 WASHINGTON

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

7/31/84

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 31, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Edwin M. Martin, Jr
Treasurer
The Committe to Re-Elect
Congressman Studds
P.O. Box 5
Norwell, Massachusetts 02061

Re: MUR 1744

8504047553

Dear Mr. Martin:

This letter is to notify you that on July 24, 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 1744. Please refer to this number in all future correspondence.

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

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

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

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

If you have any questions, please contact Lois Lerner, 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

8504054754

MUR 1744 LERNER

PS Form 3811, June 1985

● 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: Edwin M. Martin, Jr. Treasurer The Committee to Re-elect Congressman Studds P.O. Box 5 Norwell MA 02061

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

ARTICLE NUMBER 943284

(Always obtain signature of addressee or agent)

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

DATE OF DELIVERY AUG 2 1984

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

NORWELL MA AUG 2 1984 USPO

7/31/84

RECEIVED AT THE FEC
GCC#4127
84 JUL 24 P12:21

July 18, 1984

MUR 1744

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

Dear General Counsel:

I would like to formally request the Federal Election Commission to review, under 2 USC, 473G (a) (1) section 111.4 of the federal regulations, and any other applicable provisions, two (2) possible violations of the federal election laws.

I believe that The Committee to Re-Elect Congressman Studds, Edwin M. Martin, Jr. Treasurer, may have violated 11 CFR, 104.3 of the federal election laws regarding "Disclosure of Receipts and Disbursements" during the conduct of fundraising events which took place in San Francisco, California during either late April, or early May of 1984, by failing to fully disclose fundraising expenses directly attributable to those events.

I believe the fundraising events (there appear to be as many as three) occurred based on an article which appeared in the May 11, 1984 edition of the San Francisco Chronicle (attached as appendix "A"). Further, I believe they occurred based on ten (10) itemized receipts listed in Schedule "A" of the Committee's Report for the period 4/1/84 through 6/30/84. These receipts totalled $8750.00 (attached as appendix "B").

After reviewing the Committee to Re-Elect Congressman Studds filing for the period cited above, I can find no disbursement or in-kind contribution to any individual, organization or corporation for any fundraising activity in California (attached as appendix "C"). I understand the exceptions allowed under 107 B and 108 B of the regulations. However, I believe that based on recent problems with the Committee's fundraising (see newspaper article attached as appendix "D") there is reason to believe similiar instances may have occurred.

Based on those facts, I formally request that the FEC review this instance to determine whether or not the disclosure of receipts and disbursements provisions of federal law have been violated.

Further, I request that the Federal Election Commission review the status of Congressman Studds' "Trust Fund," which was established ostensibly for the purpose of raising funds to pay for legal fees incurred as a result of his legal battle regarding his affair with a teenage House page, for which he was ultimately censured by his House colleagues.

I request this review because I believe that the activities of the "Studds' Trust Fund," and those acting on behalf of Congressman Studd's and the "Studds' Trust Fund" may be engaging

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in fundraising efforts which should legally be governed by FEC statutes.

Specifically, I cite a letter sent recently by the Human Rights Campaign Fund soliciting funds on behalf of Congressman Studds (attached a appendix "E"). In that four-paged letter there are four paragraphs which speak to the significance of the potential contribution to Studds' re-election prospects.

I do not believe that a "defense fund solicitation letter" should state that "....it is important that Gerry Studds' be re-elected." I believe that kind of solicitation falls within the jurisdiction of federal law and FEC regulations. Further, I believe that members of the Human Rights Campaign Fund are actively engaged in promoting the candidacy of Congressman Studds (see appendix "A"), and as such, the organizational fundraising activities should be disclosed and regulated under FEC requirements.

Sincerely,

Peter Y. Flynn

Peter Y. Flynn
Obery Heights
Plymouth, Massachusetts
02360

I swear to all statements made herein under the pains and penalty of perjury.

Peter Y. Flynn Date July 18, 1984

Witnessed that the statements contained herein are the free act and deed of Peter Y. Flynn.

Notary Public

My Commission in the Commonwealth of Massachusetts expires on August 12, 1988

8504054475 5

For Authorized Committee

(Summary Page)

ALIGN AREA

C00018648 821207
EDWIN M MARTIN JR
COMMITTEE TO RE-ELECT CONGRESS
MAN STUDDS
P.O. BOX 5
NORWELL MA 02061

2. FEC Identification Number
040657

3. Is this Report an Amendment?
☐ YES ☒ NO

...t than previously reported.

...ORT

☒

☐ April 15 Quarterly Report

☒ July 15 Quarterly Report

☐ October 15 Quarterly Report

☐ January 31 Year End Report

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

☐ Twelfth day report ...ceding ... Election)
election on ... in the State of ...

☐ Thirtieth day report following the General Election on

☐ Termination Report

RECEIVED
JUL 16 1984
SECRETARY OF STATE
DIV. OF PUBLIC RECORDS

This report contains activity for ☒ Primary Election ☐ General Election ☐ Special Election ☐ Runoff Election

SUMMARY

5. Covering Period 4/1/84 through 6/30/84

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. Net Contributions (other than loans)		
(a) Total Contributions (other than loans) (From Line 11 (e))	96,412.89	133,844.83
(b) Total Contribution Refunds (from Line 20 (d))	0	0
(c) Net Contributions (other than loans) (subtract Line 6 (b) from 6 (a))	96,412.89	133,844.83
7. Net Operating Expenditures		
(a) Total Operating Expenditures (from Line 17)	77,740.40	108,157.77
(b) Total Offsets to Operating Expenditures (from Line 14)	0	0
(c) Net Operating Expenditures (Subtract Line 7 (b) from 7 (a))	77,740.40	108,157.77
8. Cash on Hand at Close of Reporting Period (from Line 27)	51,594.89	
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)	0	
10. Debts and Obligations Owed BY The Committee (Itemize all on Schedule C or Schedule D)	0	

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

Edwin M. Martin, Jr.
Type or Print Name of Treasurer

Edwin M. Martin Jr.
SIGNATURE OF TREASURER

7/10/84
Date

For further information, contact:
Federal Election Commission
Toll Free 800 424-9530
Local 202 523 4068

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

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

FEC FORM 3 (3/80)

8504054757

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

Name of Committee (In Full): The Committee to Reelect Congressman Studds

Report Covering the Period: From: 4/1/84 To: 6/30/84

	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date	
I. RECEIPTS			
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees (Memo Entry Unitemized $ 53,887.89)	73,562.89	106,744.83	11 (a)
(b) Political Party Committees	0	0	11 (b)
(c) Other Political Committees	22,850.00	27,100.00	11 (c)
(d) The Candidate	0	0	11 (d)
(e) TOTAL CONTRIBUTIONS (other than loans (add 11(a), 11(b), 11(c) and 11(d).	96,412.89	133,844.83	11 (e)
12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES	0	0	12
13. LOANS:			
(a) Made or Guarenteed by the Candidate	0	0	13 (a)
(b) All Other Loans	0	0	13 (b)
(c) TOTAL LOANS (add 13 (a) and 13 (b))	0	0	13 (c)
14. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	0	0	14
15. OTHER RECEIPTS (Dividends, Interest, etc.)	593.76	993.90	15
16. TOTAL RECEIPTS (add 11 (e), 12, 13 (c), 14 and 15)	97,006.65	134,838.73	16
II. DISBURSEMENTS			
17. OPERATING EXPENDITURES	77,740.40	108,157.77	17
18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES	0	0	18
19. LOAN REPAYMENTS:			
(a) Of Loans Made or Guaranteed by the Candidate	0	0	19 (a)
(b) Of All Other Loans	0	0	19 (b)
(c) TOTAL LOAN REPAYMENTS (add 19 (a) and 19 (b))	0	0	19 (c)
20. REFUNDS OF CONTRIBUTIONS TO:			
(a) Individuals/Persons Other Than Political Committees	0	0	20 (a)
(b) Political Party Committees	0	0	20 (b)
(c) Other Political Committees	0	0	20 (c)
(d) TOTAL CONTRIBUTION REFUNDS (add 20 (a), 20 (b), and 20 (c))	0	0	20 (d)
21. OTHER DISBURSEMENTS	119.50	601.25	21
22. TOTAL DISBURSEMENTS (add 17, 18, 19 (c), 20 (d) and 21)	77,939.90	108,839.02	22

III. CASH SUMMARY

23. CASH ON HAND AT BEGINNING OF REPORTING PERIOD	$ 32,528.14	23
24. TOTAL RECEIPTS THIS PERIOD (From Line 16)	$ 97,006.65	24
25. SUBTOTAL (Add Line 23 and Line 24)	$ 129,534.79	25
26. TOTAL DISBURSEMENTS THIS PERIOD (From Line 22)	$ 77,939.90	26
27. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (Subtract Line 26 from 25)	$ 51,594.89	27

SCHEDULE A

ITEMIZED RECEIPTS

Page 1 of 6 for LINE NUMBER 11a
(Use separate schedule(s) for each category of the Detailed Summary Page)

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Name of Committee (in Full)
The Committee to Reelect Congressman Studds

A. Full Name, Mailing Address and ZIP Code	Name of Employer / Occupation / Aggregate Year-to-Date	Date (month, day, year)	Amount of Each Receipt this Period
Bill Kerby 234 Old Country Rd. E. Sandwich, Ma. 02537 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	self-employed screenwriter Aggregate Year-to-Date–$ 250.00	4/11/84	250.00
B. Full Name, Mailing Address and ZIP Code	**Name of Employer / Occupation / Aggregate Year-to-Date**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
Ronald Amsin R.D 1, Box 421 Harvard, Ma. 01451 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Commonwealth of Ma. Administrator Aggregate Year-to-Date–$ 900.00	4/12/84	900.00
C. Full Name, Mailing Address and ZIP Code	**Name of Employer / Occupation / Aggregate Year-to-Date**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
James Hormel 19 Miguel St. San Francisco, Ca 94131 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Self-employed Administrator Aggregate Year-to-Date–$ 1,000.00	4/14/84	1,000.00
D. Full Name, Mailing Address and ZIP Code	**Name of Employer / Occupation / Aggregate Year-to-Date**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
Michael Moskow 2 Park Sq. Boston Ma. 02116 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Self-employed Real Estate Aggregate Year-to-Date–$ 1,000.00	4/14/84	1,000.00
E. Full Name, Mailing Address and ZIP Code	**Name of Employer / Occupation / Aggregate Year-to-Date**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
Augustus Fabens 58 Brimmer St. Boston Ma. 02108 Receipt For: ☒ Primary ☒ General ☐ Other (specify):	Self- employed publisher Aggregate Year-to-Date–$ 1,000.00	4/14/84	1,000.00
F. Full Name, Mailing Address and ZIP Code	**Name of Employer / Occupation / Aggregate Year-to-Date**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
Art Baer 2225 Malaga Blvd. Los Angeles, Ca. 90068 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Art Baer Productions TV producer Aggregate Year-to-Date–$ 500.00	5/25/84	500.00
G. Full Name, Mailing Address and ZIP Code	**Name of Employer / Occupation / Aggregate Year-to-Date**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
Alan Ades PO Box D-909 Healy Rd New Bedford Ma 02742 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	States Nitewear Stately Lady Nitewear President Aggregate Year-to-Date–$ 500.00	4/24/84	500.00
SUBTOTAL of Receipts This Page (optional)			$ 5,150.00
TOTAL This Period (last page this line number only)			

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SCHEDULE A

ITEMIZED RECEIPTS

Page 2 of 4 for LINE NUMBER 11a
(Use separate schedule(s) for each category of the Detailed Summary Page)

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Name of Committee (in Full)
The Committee to Reelect Congressman Studds

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Mait Edey Box 2681 Vinyard Haven , Ma. 02568	Self-employed	4/24/84	300.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation: writer		
	Aggregate Year-to-Date—$ 300.00		

B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Sally and Christopher Lutz P.O. Box 26 So. Woodstock Vt. 05071		4/25/84	1,000.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation		
	Aggregate Year-to-Date—$ 1,000.00		

C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Richard Kaplan 8281 Hollywood Blvd Los Angeles, Ca. 90069	self -employed	5/18/84	250.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation: attorney		
	Aggregate Year-to-Date—$ 250.00		

D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Susan Bennett 220 Brattle St. Cambridge Ma. 02138	retired	5/7/84	500.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation		
	Aggregate Year-to-Date—$ 500.00		

E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Helen W. Edey Seven Gates Farm Vinyard Haven, Ma 02568	retired	5/ 8/84	300.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation		
	Aggregate Year-to-Date—$ 300.00		

F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Ruth D. Terzaghi 3 Robinson Cir. Winchester, Ma. 01890	retired	5/17/84	500.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation		
	Aggregate Year-to-Date—$ 500.00		

G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Colin Higgins 10880 Wilshire Blvd. Suite 2110 Los Anbeles, Ca.	Colin Higgins Productions	5/18/84	1,000.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation: filmmaker		
	Aggregate Year-to-Date—$ 1,000.00		

SUBTOTAL of Receipts This Page (optional)	$ 3,850.00
TOTAL This Period (last page this line number only)	

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SCHEDULE A

ITEMIZED RECEIPTS

LINE NUMBER 11a
(Use separate schedule(s) for each category of the Detailed Summary Page)

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Name of Committee (In Full)
The Committee to Reelect Congressman Studds

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Franz Denghausen 31 Philips Ave Pigeon Cove, Ma 01966	Occupation	4/14/84	1,000.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date–$ 1,000.00		
B. Full Name, Mailing Address and ZIP Code	**Name of Employer**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
Sheldon Andelson 9200 Sunset Blvd Los Angeles, Ca. 90069	Bank of Los Angeles Occupation Chairman of Board	5/18/84	500.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date–$ 500.00		
C. Full Name, Mailing Address and ZIP Code	**Name of Employer**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
Elizabeth Bramhall Seven Gates Farm RFD Tisbury Ma. o2568	unemployed Occupation	6/5/84	250.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date–$ 250.00		
D. Full Name, Mailing Address and ZIP Code	**Name of Employer**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
Richard Sullivan 342 Long Pond Dr. So. Yarmouth, Ma. 02664	Bryden- Sullivan Insurance Occupation President	6/5/84	250.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date–$ 250.00		
E. Full Name, Mailing Address and ZIP Code	**Name of Employer**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
Paul Diener 1380 Mockingbird Place W. Hollywood, Ca. 90069	self-emplyed Occupation investor	5/18/84	1,000.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date–$ 1,000.00		
F. Full Name, Mailing Address and ZIP Code	**Name of Employer**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
John G. Archibald Algiers- State Dept Washington D.C.	Occupation	5/22/84	500.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date–$ 500.00		
G. Full Name, Mailing Address and ZIP Code	**Name of Employer**	**Date (month, day, year)**	**Amount of Each Receipt This Period**
Samuel Ades P.O. Box d-909 Healy Rd New Bedford Ma 02742	retired Occupation	4/24/84	500.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date–$ 500.00		
SUBTOTAL of Receipts This Page (optional)			4,000.00
TOTAL This Period (last page this line number only)			

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SCHEDULE A

ITEMIZED RECEIPTS

Page ___ of ___ for
LINE NUMBER 11a
(Use separate schedule(s) for each category of the Detailed Summary Page)

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Name of Committee (in Full)
The Committee to Reelect Congressman Studds

A. Full Name, Mailing Address and ZIP Code Mr.+ Mrs. Andrew Anderson- Bell 64 Highland Street Cambridge, Ma. 02138 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Retired Occupation Aggregate Year-to-Date—$ 250.00	Date (month, day, year) 4/27/84	Amount of Each Receipt this Period 250.00
B. Full Name, Mailing Address and ZIP Code Duke Comegys 2034 Outpost Drive Los Angeles, Ca. 90068 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Self- Employed Occupation Investor Aggregate Year-to-Date—$ 500.00	Date (month, day, year) 5/18/84	Amount of Each Receipt This Period 500.00
C. Full Name, Mailing Address and ZIP Code Albert Lee 2301 Jefferson Davis Hwy #1524 Arlington, VA 22202 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Lee Yuan Restaurant Occupation Restaurateur Aggregate Year-to-Date—$ 1,000.00	Date (month, day, year) 6/1/84	Amount of Each Receipt This Period 1,000.00
D. Full Name, Mailing Address and ZIP Code David Goodstein P.O. Box 2290 Malibu, Ca 90265 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Goodstein, Watson + Associates Occupation President Aggregate Year-to-Date—$ 2,000.00	Date (month, day, year) 5/18/84	Amount of Each Receipt This Period 2,000.00
E. Full Name, Mailing Address and ZIP Code Victor B. Stevens Jr. P.O. Box 652 W. Harwich, Ma. 02671 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$ 250.00	Date (month, day, year) 6/16/84	Amount of Each Receipt This Period 250.00
F. Full Name, Mailing Address and ZIP Code Mark Feeney 20 Sweetser Ave. Reading, Ma. 01867 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Boston Globe Occupation Journalist Aggregate Year-to-Date—$ 250.00	Date (month, day, year) 6/21/84	Amount of Each Receipt This Period 250.00
G. Full Name, Mailing Address and ZIP Code Carol Bernstein Ferry Box 657 Scarsdale, N.Y 10583 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer retired Occupation Aggregate Year-to-Date—$ 500.00	Date (month, day, year) 6/25/84	Amount of Each Receipt This Period 500.00
SUBTOTAL of Receipts This Page (optional)			4,750.00
TOTAL This Period (last page this line number only)			

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SCHEDULE A

ITEMIZED RECEIPTS

Page ____ of ____ for LINE NUMBER 11a
(Use separate schedule(s) for each category of the Detailed Summary Page)

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Name of Committee (In Full)
The Committee to Reelect Congressman Studds

A. Full Name, Mailing Address and ZIP Code Andrew P. Tobias 146 Central Park West New York, N.Y. 10023 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Self- Employed Occupation Writer Aggregate Year-to-Date—$ 400.00	Date (month, day, year) 6/26/84	Amount of Each Receipt this Period 250.00
B. Full Name, Mailing Address and ZIP Code Janette L. Wise 90 Nelson Road, Box 1165 Brewster, Ma. 02631 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Nauset Regional Schools Occupation Teacher Aggregate Year-to-Date—$250.00	Date (month, day, year) 6/29/84	Amount of Each Receipt This Period 250.00
C. Full Name, Mailing Address and ZIP Code Marion Dietzgen Box 790 Cotuit, MA 02635 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Not Employed Occupation Aggregate Year-to-Date—$ 300.00	Date (month, day, year) 5/18/84	Amount of Each Receipt This Period 100.00
D. Full Name, Mailing Address and ZIP Code Anton Haunstrup 7 Freeman Street Provincetown, Ma. 02657 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Van Dereck Enterprises Inc. Occupation President Aggregate Year-to-Date—$ 300.00	Date (month, day, year) 6/12/84	Amount of Each Receipt This Period 100.00
E. Full Name, Mailing Address and ZIP Code Joseph M. Robinson 62 Captain Kendrick Drive Chatham, Ma. 02633 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Retired Occupation Aggregate Year-to-Date—$ 125.00	Date (month, day, year) 4/13/84	Amount of Each Receipt This Period 25.00
F. Full Name, Mailing Address and ZIP Code Same Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Retired Occupation Aggregate Year-to-Date—$ 225.00	Date (month, day, year) 6/14/84	Amount of Each Receipt This Period 100.00
G. Full Name, Mailing Address and ZIP Code Daniel Renberg 8882 Collingwood Drive Los Angeles, CA 90069 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Daniel Renberg + Associates Occupation Investment Counselor Aggregate Year-to-Date—$ 1,000.00	Date (month, day, year) 5/29/ 84	Amount of Each Receipt This Period 1,000.00
SUBTOTAL of Receipts This Page (optional)			1,825.00
TOTAL This Period (last page this line number only)			

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SCHEDULE A

ITEMIZED RECEIPTS

LINE NUMBER 11C
(Use separate schedule(s) for each category of the Detailed Summary Page)

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Name of Committee (in Full): The Committee to Reelect Congressman Studds

A. Full Name, Mailing Address and ZIP Code Amalgamated Transit Union PAC Cope Act. Voluntary Fund 5025 Wisconsin Ave. N.W. Washington, D. C. 20016 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer: N/A Occupation: Aggregate Year-to-Date–$ 500.00	Date (month, day, year): 4/12/84	Amount of Each Receipt this Period: 500.00
B. Full Name, Mailing Address and ZIP Code AANA CRNA PAC 216 West Higgins Rd. Park Ridge, IL 60068 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer: N/A Occupation: Aggregate Year-to-Date–$ 250.00	Date (month, day, year): 6/18/84	Amount of Each Receipt This Period: 250.00
C. Full Name, Mailing Address and ZIP Code Committee on Letter Carriers Political Education 100 Indiana Ave.N.W. Washington, D. C. 20001 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer: N/A Occupation: Aggregate Year-to-Date–$ 500.00	Date (month, day, year): 4/24/84	Amount of Each Receipt This Period: 500.00
D. Full Name, Mailing Address and ZIP Code Committee on Political Action of the American Postal Workers Union AFL-CIO 817 14th St. N.W. Washington, D. C.2005 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer: N/A Occupation: Aggregate Year-to-Date–$ 500.00	Date (month, day, year): 4/24/84	Amount of Each Receipt This Period: 500.00
E. Full Name, Mailing Address and ZIP Code Same as above Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer: N/A Occupation: Aggregate Year-to-Date–$ 1,250	Date (month, day, year): 6/14/84	Amount of Each Receipt This Period: 750.00
F. Full Name, Mailing Address and ZIP Code Graphic Communications Inter. Union PAC Voluntary Funds Act. 1900 L St. N. W. Wash., D.C.20036 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer: N/A Occupation: Aggregate Year-to-Date–$ 300.00	Date (month, day, year): 6/13/84	Amount of Each Receipt This Period: 300.00
G. Full Name, Mailing Address and ZIP Code Industrial Union Dept. AFL-CIO Voluntary Fund 815 16th St. N. W. Washington, D. C. 20006 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer: N/A Occupation: Aggregate Year-to-Date–$ 150.00	Date (month, day, year): 6/18/84	Amount of Each Receipt This Period: 150.00
SUBTOTAL of Receipts This Page (optional)			2,950.00
TOTAL This Period (last page this line number only)			

SCHEDULE A

ITEMIZED RECEIPTS

LINE NUMBER 11C
(Use separate schedule(s) for each category of the Detailed Summary Page)

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Name of Committee (In Full): The Committee to Reelect Congressman Studds

A. Full Name, Mailing Address and ZIP Code NARFE--PAC 1533 New Hampshire Ave. N. W. Washington, D. C. 20036 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer: N/A Occupation: Aggregate Year-to-Date-$ 1,000.00	Date (month, day, year): 4/19/84	Amount of Each Receipt this Period: 1,000.00
B. Full Name, Mailing Address and ZIP Code Political Education for Postmasters 4212 King St. P.O. Box 16266 Alexandria, VA 22302 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer: N/A Occupation: Aggregate Year-to-Date-$ 100.00	Date (month, day, year): 4/24/84	Amount of Each Receipt This Period: 100.00
C. Full Name, Mailing Address and ZIP Code Political Fund Railway Carmen Political League 4929 Main St. Kansas City, MO 64112 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer: N/A Occupation: Aggregate Year-to-Date-$ 200.00	Date (month, day, year): 4/25/84	Amount of Each Receipt This Period: 200.00
D. Full Name, Mailing Address and ZIP Code Peace PAC 100 Maryland Ave. N.E. Washington, D. C. 20002 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer: N/A Occupation: Aggregate Year-to-Date-$ 1,000.00	Date (month, day, year): 5/17/84	Amount of Each Receipt This Period: 1,000.00
E. Full Name, Mailing Address and ZIP Code United Food & Commercial Workers Active Ballot Club 1775 K St.N.W. Washington, D.C. 20006 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer: N/A Occupation: Aggregate Year-to-Date-$ 5,000.00	Date (month, day, year): 5/18/84	Amount of Each Receipt This Period: 5,000.00
F. Full Name, Mailing Address and ZIP Code UAWV CAP 800 E. Jefferson Detroit, MI 48214 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer: N/A Occupation: Aggregate Year-to-Date-$ 5,000.00	Date (month, day, year): 5/22/84	Amount of Each Receipt This Period: 5,000.00
G. Full Name, Mailing Address and ZIP Code Responsible Citizens Political League 3 Research Pl. Rockville, MD 20850 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer: N/A Occupation: Aggregate Year-to-Date -$ 250.00	Date (month, day, year): 4/14/84	Amount of Each Receipt This Period: 250.00
SUBTOTAL of Receipts This Page (optional)			12, 550.00
TOTAL This Period (last page this line number only)			

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SCHEDULE A

ITEMIZED RECEIPTS

Page ___ of ___ for LINE NUMBER 11C
(Use separate schedule(s) for each category of the Detailed Summary Page)

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Name of Committee (in Full)
The Committee to Reelect Congressman Studds

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Transportation Political Education League 14600 Detroit Ave. Cleveland, OH	N/A	5/25/84	500.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation Aggregate Year-to-Date-$ 500.00		
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
American Federation of Gov't Employees PAC 1325 Massachusetts Ave. N. W. Washington, D. C. 20005	N/A	6/23/84	1,500.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation Aggregate Year-to-Date-$ 1,500.00		
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
ILGWU Campaign Committee Fund 1710 Broadway New York, N. Y. 10019	N/A	6/29/84	1,000.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation Aggregate Year-to-Date-$ 1,000.00		
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Maintenance of Way Political League 12050 Woodward Ave. Detroit, MI 48203	N/A	6/29/84	250.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation Aggregate Year-to-Date-$ 250.00		
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Nat'l Comm. for an Effective Congress 400 C St. S.E. Washington, D. C. 20002	N/A	4/23/84	2,500.00 in kind
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation Aggregate Year-to-Date-$ 3,500.00		
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
NARFE PAC 1533 New Hampshire Ave. N.W. Washington, D. C. 20036	N/A	6/25/84	500.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation Aggregate Year-to-Date-$ 1,500.00		
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Joel Wach Dinner Committee P.O. Box 39451 Los Angeles, CA 90039	N/A	5/17/84	1,000.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation Aggregate Year-to-Date-$ 1,000.00		
SUBTOTAL of Receipts This Page (optional)			7,250.00
TOTAL This Period (last page this line number only)			

8040547565

SCHEDULE A

ITEMIZED RECEIPTS

LINE NUMBER 11c
(Use separate schedule(s) for each category of the Detailed Summary Page)

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Name of Committee (in Full)
The Committee to Reelect Congressman Studds

A. Full Name, Mailing Address and ZIP Code Action for Nuclear Disarmament Cape Cod RR #1-75 Great Oak Rd. Orleans, MA 02631 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer N/A Occupation Aggregate Year-to-Date—$ 100.00	Date (month, day, year) 6/29/84	Amount of Each Receipt this Period 100.00
B. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
C. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
D. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
E. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
F. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
G. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
SUBTOTAL of Receipts This Page (optional)			100.00
TOTAL This Period (last page this line number only)			22,850.00

8504054767

SCHEDULE A

category of the Detailed Summary Page)

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Name of Committee (in Full)
The Committee to Reelect Congressman Studds

A. Full Name, Mailing Address and ZIP Code Louise D. Peck 517 North Salem Rd. Ridgefield, CT 06877 Receipt For: [X] Primary [ ] General [ ] Other (specify):	Name of Employer Retired Occupation Aggregate Year-to-Date–$ 300.00	Date (month, day, year) 6/19/84	Amount of Each Receipt this Period 100.00
B. Full Name, Mailing Address and ZIP Code Receipt For: [ ] Primary [ ] General [ ] Other (specify):	Name of Employer Occupation Aggregate Year-to-Date–$	Date (month, day, year)	Amount of Each Receipt This Period
C. Full Name, Mailing Address and ZIP Code Receipt For: [ ] Primary [ ] General [ ] Other (specify):	Name of Employer Occupation Aggregate Year-to-Date–$	Date (month, day, year)	Amount of Each Receipt This Period
D. Full Name, Mailing Address and ZIP Code Receipt For: [ ] Primary [ ] General [ ] Other (specify):	Name of Employer Occupation Aggregate Year-to-Date–$	Date (month, day, year)	Amount of Each Receipt This Period
E. Full Name, Mailing Address and ZIP Code Receipt For: [ ] Primary [ ] General [ ] Other (specify):	Name of Employer Occupation Aggregate Year-to-Date–$	Date (month, day, year)	Amount of Each Receipt This Period
F. Full Name, Mailing Address and ZIP Code Receipt For: [ ] Primary [ ] General [ ] Other (specify):	Name of Employer Occupation Aggregate Year-to-Date–$	Date (month, day, year)	Amount of Each Receipt This Period
G. Full Name, Mailing Address and ZIP Code Receipt For: [ ] Primary [ ] General [ ] Other (specify):	Name of Employer Occupation Aggregate Year-to-Date–$	Date (month, day, year)	Amount of Each Receipt This Period
SUBTOTAL of Receipts This Page (optional)			100.00
TOTAL This Period (last page this line number only)			19,675.00

8504054763

SCHEDULE A

ITEMIZED RECEIPTS

LINE NUMBER 15
(Use separate schedule(s) for each category of the Detailed Summary Page)

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Name of Committee (in Full)
The Committee to Reelect Congressman Studds

A. Full Name, Mailing Address and ZIP Code Rockland Trust Company 288 Union St. Rockland, MA 02370 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer N/A Occupation Aggregate Year-to-Date—$ 243.87	Date (month, day, year) 4/1/84	Amount of Each Receipt this Period 80.91
B. Full Name, Mailing Address and ZIP Code Same Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer N/A Occupation Aggregate Year-to-Date—$ 321.69	Date (month, day, year) 5/1/84	Amount of Each Receipt This Period 77.82
C. Full Name, Mailing Address and ZIP Code Same Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer N/A Occupation Aggregate Year-to-Date—$ 450.97	Date (month, day, year) 6/1/84	Amount of Each Receipt This Period 129.28
D. Full Name, Mailing Address and ZIP Code Fidelity Service Co. P.O. Box 2656 Boston, MA 02208 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer N/A Occupation Aggregate Year-to-Date—$ 542.93	Date (month, day, year) 6/8/84	Amount of Each Receipt This Period 305.75
E. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
F. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
G. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date—$	Date (month, day, year)	Amount of Each Receipt This Period
SUBTOTAL of Receipts This Page (optional)			
TOTAL This Period (last page this line number only)			593.76

8504047569

SCHEDULE B

ITEMIZED DISBURSEMENTS

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Name of Committee (in Full)
The Committee to Reelect Congressman Studds

	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Full Name, Mailing Address and ZIP Code Cooper Associates P.O. Box 73 Batesville, VA22924	Consulting Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/1/84	$2,250.00
B. Full Name, Mailing Address and ZIP Code Postmaster Washington, D. C.	Stamps Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/1/84	200.00
C. Full Name, Mailing Address and ZIP Code Standish Realty Standish Village Plaza 243 Church St. Pembroke, MA 02359	Rent Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/2/84	500.00
D. Full Name, Mailing Address and ZIP Code Same	Rent Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	5/3/84	500.00
E. Full Name, Mailing Address and ZIP Code Same	Rent Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	6/4/84	500.00
F. Full Name, Mailing Address and ZIP Code Best Leasing Corp. 120 Derby St. Hingham, MA 02043	Car rental Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/2/84	375.00
G. Full Name, Mailing Address and ZIP Code Same	Car rental Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	5/15/84	375.00
H. Full Name, Mailing Address and ZIP Code Same	Car rental Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	6/1/84	375.00
I. Full Name, Mailing Address and ZIP Code SATCO Direct mail 7347 Lockport Pl. Lorton, VA 22079	Printing and postage Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/2/84	3,982.93
SUBTOTAL of Disbursements This Page (optional)			9,057.93
TOTAL This Period (last page this line number only)			

8504547703

SCHEDULE B

ITEMIZED DISBURSEMENTS

Page 5 of 17 for LINE NUMBER
(Use separate schedule(s) for each category of the Detailed Summary Page)

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Name of Committee (in Full)
The Committee to Reelect Congressman Studds

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for:	Date (month, day, year)	Amount of Each Disbursement This Period
Business Phone Warehouse 6 Riverdide Dr. Dedham, MA 02026	Phones Disbursement for: X Primary ☐ General ☐ Other (specify):	6/22/84	120.00
B. Full Name, Mailing Address and ZIP Code Same	Purpose of Disbursement: Phones Disbursement for: X Primary ☐ General ☐ Other (specify):	4/2/84	120.00
C. Full Name, Mailing Address and ZIP Code Same	Purpose of Disbursement: Phones Disbursement for: X Primary ☐ General ☐ Other (specify):	4/12/84	120.00
D. Full Name, Mailing Address and ZIP Code Same	Purpose of Disbursement: Phones Disbursement for: X Primary ☐ General ☐ Other (specify):	4/13/84	570.00
E. Full Name, Mailing Address and ZIP Code Same	Purpose of Disbursement: Phones Disbursement for: X Primary ☐ General ☐ Other (specify):	5/1/84	627.00
F. Full Name, Mailing Address and ZIP Code Postmaster Norwell, MA 02061	Purpose of Disbursement: Postage Disbursement for: X Primary ☐ General ☐ Other (specify):	4/2/84	11.50
G. Full Name, Mailing Address and ZIP Code Same	Purpose of Disbursement: Postage Disbursement for: X Primary ☐ General ☐ Other (specify):	4/30/84	20.00
H. Full Name, Mailing Address and ZIP Code Same	Purpose of Disbursement: Box rental Disbursement for: X Primary ☐ General ☐ Other (specify):	6/22/84	5.00
I. Full Name, Mailing Address and ZIP Code Entertainment, Inc. 15 Lansdowne St. Boston, MA 02215	Purpose of Disbursement: Use of facilities Promotional activities Disbursement for: X Primary ☐ General ☐ Other (specify):	4/24/84	2,229.50
SUBTOTAL of Disbursements This Page (optional)			3,823.00
TOTAL This Period (last page this line number only)			

8504717

SCHEDULE B

ITEMIZED DISBURSEMENTS

LINE NUMBER 17
(Use separate schedule(s) for each category of the Detailed Summary Page)

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Name of Committee (in Full)
The Committee to Reelect Congressman Studds

A. Full Name, Mailing Address and ZIP Code Postmaster Hanover, MA 02339	Purpose of Disbursement Postage Disbursement for: X Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/4/84	Amount of Each Disbursement This Period 20.00
B. Full Name, Mailing Address and ZIP Code Same	Purpose of Disbursement Postage Disbursement for: X Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/6/84	Amount of Each Disbursement This Period 29.75
C. Full Name, Mailing Address and ZIP Code Same	Purpose of Disbursement Postage Disbursement for: X Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/12/84	Amount of Each Disbursement This Period 140.00
D. Full Name, Mailing Address and ZIP Code Same	Purpose of Disbursement Postage Disbursement for: X Primary ☐ General ☐ Other (specify):	Date (month, day, year) 5/9/84	Amount of Each Disbursement This Period 20.00
E. Full Name, Mailing Address and ZIP Code Same	Purpose of Disbursement Postage Disbursement for: X Primary ☐ General ☐ Other (specify):	Date (month, day, year) 6/13/84	Amount of Each Disbursement This Period 200.00
F. Full Name, Mailing Address and ZIP Code Roland DuPont 36 Hunter's Brook Rd. Buzzards Bay, MA 02532	Purpose of Disbursement Reimb. exp. Bldg. supplies Disbursement for: ■ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/6/84	Amount of Each Disbursement This Period 138.54
G. Full Name, Mailing Address and ZIP Code Same	Purpose of Disbursement Reimb. exp. Bldg. supplies Disbursement for: X Primary ☐ General ☐ Other (specify):	Date (month, day, year) 6/1/84	Amount of Each Disbursement This Period 103.27
H. Full Name, Mailing Address and ZIP Code Contempo 166 Terrace Boston, MA 02120	Purpose of Disbursement . Mailing and postage Disbursement for: X Primary ☐ General ☐ Other (specify):	Date (month, day, year) 6/5/84	Amount of Each Disbursement This Period 2,650.00
I. Full Name, Mailing Address and ZIP Code same	Purpose of Disbursement Mailing and postage Disbursement for: X Primary ☐ General ☐ Other (specify):	Date (month, day, year) 6/20/84	Amount of Each Disbursement This Period 4, 430.00
SUBTOTAL of Disbursements This Page (optional)			7,731.56
TOTAL This Period (last page this line number only)			

8504047723

SCHEDULE B

ITEMIZED DISBURSEMENTS

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Name of Committee (in Full)

Committee to Reelect Congressman Studds

A. Full Name, Mailing Address and ZIP Code Rockland Trust Company 288 Union St. Rockland, MA 02370	Purpose of Disbursement Mastercard: dinner, travel Disbursement for: X Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/4/84	Amount of Each Disbursement This Period 294.81
B. Full Name, Mailing Address and ZIP Code Same	Purpose of Disbursement Mastercard: dinner, travel Disbursement for: X Primary ☐ General ☐ Other (specify):	Date (month, day, year) 5/15/84	Amount of Each Disbursement This Period 418.80
C. Full Name, Mailing Address and ZIP Code Same	Purpose of Disbursement Mastercard: dinner Disbursement for: X Primary ☐ General ☐ Other (specify):	Date (month, day, year) 6/15/84	Amount of Each Disbursement This Period 21.00
D. Full Name, Mailing Address and ZIP Code Same	Purpose of Disbursement Withholding and FICA taxes Disbursement for: X Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/7/84	Amount of Each Disbursement This Period 1,524.40
E. Full Name, Mailing Address and ZIP Code Same	Purpose of Disbursement Withholding and FICA taxes Disbursement for: X Primary ☐ General ☐ Other (specify):	Date (month, day, year) 5/15/84	Amount of Each Disbursement This Period 2,363.36
F. Full Name, Mailing Address and ZIP Code Same	Purpose of Disbursement Withholding and FICA taxes Disbursement for: X Primary ☐ General ☐ Other (specify):	Date (month, day, year) 6/14/84	Amount of Each Disbursement This Period 2,425.16
G. Full Name, Mailing Address and ZIP Code Deschampes Printing 3 Dodge St. Salem, MA 01970	Purpose of Disbursement Printing Disbursement for: X Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/9/84	Amount of Each Disbursement This Period 252.53
H. Full Name, Mailing Address and ZIP Code Same	Purpose of Disbursement Printing Disbursement for: X Primary ☐ General ☐ Other (specify):	Date (month, day, year) 5/11/84	Amount of Each Disbursement This Period 481.95
I. Full Name, Mailing Address and ZIP Code Same	Purpose of Disbursement Printing Disbursement for: X Primary ☐ General ☐ Other (specify):	Date (month, day, year) 5/21/84	Amount of Each Disbursement This Period 54.60
SUBTOTAL of Disbursements This Page (optional)			7,836.61
TOTAL This Period (last page this line number only)			

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SCHEDULE B

ITEMIZED DISBURSEMENTS

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Name of Committee (in Full)
Committee to Reelect Congressman Studds

	Purpose of Disbursement / Disbursement for	Date (month, day, year)	Amount of Each Disbursement This Period
A. Full Name, Mailing Address and ZIP Code Laurie Christiansen 89 Doane St. Cohasset, MA 02025	Rent Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	6/6/84	375.00
B. Full Name, Mailing Address and ZIP Code Kenneth C. Shaughnessy Centre St. Hyannis, MA 02061	Rent Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/9/84	600.00
C. Full Name, Mailing Address and ZIP Code Ma. Division of Employment Security Chas. F. Hurley Bldg. Gov't Ctr. Boston, MA 02114	Purpose of Disbursement Quarterly contrib. unemployment taxes Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/9/84	280.44
D. Full Name, Mailing Address and ZIP Code Drummer Boy Screen Print 1097 Marlboro St. New Bedford, MA 02740	Purpose of Disbursement Signs Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/26/84	198.45
E. Full Name, Mailing Address and ZIP Code Same	Purpose of Disbursement Bumper stickers Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	5/21/84	852.60
F. Full Name, Mailing Address and ZIP Code Isidore Kuczewski 1120 Acushnet Ave. New Bedford, MA 02740	Purpose of Disbursement Rent Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/23/84	400.00
G. Full Name, Mailing Address and ZIP Code Same	Purpose of Disbursement Rent Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	6/4/84	600.00
H. Full Name, Mailing Address and ZIP Code David R. Ramage, Inc. WA 29 Underground Garage Washington, D. C. 20515	Purpose of Disbursement Printing Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/23/84	1,286.00
I. Full Name, Mailing Address and ZIP Code Same	Purpose of Disbursement Printing Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	6/13/84	1,112.00
SUBTOTAL of Disbursements This Page (optional)			5,704.49
TOTAL This Period (last page this line number only)			

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SCHEDULE B

ITEMIZED DISBURSEMENTS

Page 6 of 10 for LINE NUMBER 17
(Use separate schedule(s) for each category of the Detailed Summary Page)

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Name of Committee (in Full)
The Committee to Reelect Congressman Studds

A. Full Name, Mailing Address and ZIP Code SCF Postmaster Boston, MA	Purpose of Disbursement Postage Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/9/84	Amount of Each Disbursement This Period 125.00
B. Full Name, Mailing Address and ZIP Code Same	Purpose of Disbursement Postage Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/13/84	Amount of Each Disbursement This Period 100.00
C. Full Name, Mailing Address and ZIP Code Same	Purpose of Disbursement Postage Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 5/3/84	Amount of Each Disbursement This Period 50.00
D. Full Name, Mailing Address and ZIP Code Same	Purpose of Disbursement Postage Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 5/23/84	Amount of Each Disbursement This Period 40.00
E. Full Name, Mailing Address and ZIP Code Same	Purpose of Disbursement Postage Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 5/31/84	Amount of Each Disbursement This Period 9.35
F. Full Name, Mailing Address and ZIP Code Same	Purpose of Disbursement Postage Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 6/4/84	Amount of Each Disbursement This Period 3.25
G. Full Name, Mailing Address and ZIP Code Same	Purpose of Disbursement Postage Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 6/6/84	Amount of Each Disbursement This Period 100.00
H. Full Name, Mailing Address and ZIP Code Same	Purpose of Disbursement Postage Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 6/12/84	Amount of Each Disbursement This Period 100.00
I. Full Name, Mailing Address and ZIP Code Same	Purpose of Disbursement Postage Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 6/19/84	Amount of Each Disbursement This Period 150.00
SUBTOTAL of Disbursements This Page (optional)			677.60
TOTAL This Period (last page this line number only)			

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SCHEDULE B

ITEMIZED DISBURSEMENTS

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Name of Committee (in Full)
The Committee to Reelect Congressman Studds

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for:	Date (month, day, year)	Amount of Each Disbursement This Period
SCF Postmaster Boston, MA	Postage Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	6/26/84	61.70
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for:	Date (month, day, year)	Amount of Each Disbursement This Period
Dickenson 67 Federal Avenue Quincy, MA. 02169	Computer Services Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/13/84	1422.12
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for:	Date (month, day, year)	Amount of Each Disbursement This Period
Same	Computer services Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	4/13/84	800.00
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for:	Date (month, day, year)	Amount of Each Disbursement This Period
Same	Computer services Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/13/84	425.00
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for:	Date (month, day, year)	Amount of Each Disbursement This Period
Same	Computer services Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	5/17/84	1,068.93
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for:	Date (month, day, year)	Amount of Each Disbursement This Period
Same	Computer services Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	6/5/84	840.00
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for:	Date (month, day, year)	Amount of Each Disbursement This Period
Same	Mailing and postage Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	5/22/84	2,244.00
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for:	Date (month, day, year)	Amount of Each Disbursement This Period
Office Supply Co. 100 Penniman St. New Bedford, MA 02740	Furniture rental Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/25/84	78.75
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for:	Date (month, day, year)	Amount of Each Disbursement This Period
Same	Furniture rental Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	6/4/84	78.75
SUBTOTAL of Disbursements This Page (optional)			7,019.25
TOTAL This Period (last page this line number only)			

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SCHEDULE B

ITEMIZED DISBURSEMENTS

LINE NUMBER 17
(Use separate schedule(s) for each category of the Detailed Summary Page)

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Name of Committee (in Full)
Committee to Reelect Congressman Studds

A. Full Name, Mailing Address and ZIP Code New England Telephone Co. Boston, MA 02207	Purpose of Disbursement Deposit Disbursement for: X Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/23/84	Amount of Each Disbursement This Period 500.00
B. Full Name, Mailing Address and ZIP Code Same	Purpose of Disbursement Phone service Disbursement for: X Primary ☐ General ☐ Other (specify):	Date (month, day, year) 5/5/84	Amount of Each Disbursement This Period 560.61
C. Full Name, Mailing Address and ZIP Code Same	Purpose of Disbursement Phone Service Disbursement for: X Primary ☐ General ☐ Other (specify):	Date (month, day, year) 5/29/84	Amount of Each Disbursement This Period 443.34
D. Full Name, Mailing Address and ZIP Code Same	Purpose of Disbursement Phone Service Disbursement for: X Primary ☐ General ☐ Other (specify):	Date (month, day, year) 6/1/84	Amount of Each Disbursement This Period 27.50
E. Full Name, Mailing Address and ZIP Code Same	Purpose of Disbursement Phone service Disbursement for: X Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/6/84	Amount of Each Disbursement This Period 257.74
F. Full Name, Mailing Address and ZIP Code Same	Purpose of Disbursement Phone service Disbursement for: X Primary ☐ General ☐ Other (specify):	Date (month, day, year) 6/13/84	Amount of Each Disbursement This Period 340.98
G. Full Name, Mailing Address and ZIP Code Coastal Copy Center 243 Church St. Pembroke, MA 02359	Purpose of Disbursement Xeroxing Disbursement for: X Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/30/84	Amount of Each Disbursement This Period 32.45
H. Full Name, Mailing Address and ZIP Code Same	Purpose of Disbursement Xeroxing Disbursement for: X Primary ☐ General ☐ Other (specify):	Date (month, day, year) 5/29/84	Amount of Each Disbursement This Period 19.85
I. Full Name, Mailing Address and ZIP Code Same	Purpose of Disbursement Xeroxing Disbursement for: X Primary ☐ General ☐ Other (specify):	Date (month, day, year) 6/22/84	Amount of Each Disbursement This Period 20.37
SUBTOTAL of Disbursements This Page (optional)			2,202.84
TOTAL This Period (last page this line number only)			

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SCHEDULE B

ITEMIZED DISBURSEMENTS

LINE NUMBER 17
(Use separate schedule(s) for each category of the Detailed Summary Page)

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Name of Committee (In Full)
Committee to Reelect Congressman Studds

A. Full Name, Mailing Address and ZIP Code Mt. Vernon Printing 2600 Pittman Dr. Silver Spring, MD 20910	Purpose of Disbursement Printing Disbursement for: X Primary ☐ General ☐ Other (specify):	Date (month, day, year) 5/5/84	Amount of Each Disbursement This Period 2,542.03
B. Full Name, Mailing Address and ZIP Code David Bender 441 West End Ave #16A New York, N. Y. 10024	Purpose of Disbursement Consulting Disbursement for: ☐ Primary ☐ General X ☐ Other (specify):	Date (month, day, year) 5/10/84	Amount of Each Disbursement This Period 200.00
C. Full Name, Mailing Address and ZIP Code Same	Purpose of Disbursement Reimb. exp.: food, beverage Disbursement for: X ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 6/14/84	Amount of Each Disbursement This Period 600.00
D. Full Name, Mailing Address and ZIP Code The Last Word 1777 N. Kent St. Suite 537 Arlington, VA 22209	Purpose of Disbursement Printing Disbursement for: X Primary ☐ General ☐ Other (specify):	Date (month, day, year) 5/11/84	Amount of Each Disbursement This Period 878.85
E. Full Name, Mailing Address and ZIP Code W. B. Mason Co.Inc. 59 Centre St., P.O. Box 111 Brockton, MA 02403	Purpose of Disbursement Furniture rental Disbursement for: X Primary ☐ General ☐ Other (specify):	Date (month, day, year) 5/16/84	Amount of Each Disbursement This Period 108.15
F. Full Name, Mailing Address and ZIP Code Same	Purpose of Disbursement Furniture rental Disbursement for: X Primary ☐ General ☐ Other (specify):	Date (month, day, year) 6/22/84	Amount of Each Disbursement This Period 108.15
G. Full Name, Mailing Address and ZIP Code Gerry E. Studds 16 Black Horse La. Cohasset, MA 02025	Purpose of Disbursement Reimb. exp, travel Disbursement for: X Primary ☐ General ☐ Other (specify):	Date (month, day, year) 5/21/84	Amount of Each Disbursement This Period 11.00
H. Full Name, Mailing Address and ZIP Code Same	Purpose of Disbursement Reimb. exp. travel Disbursement for: X Primary ☐ General ☐ Other (specify):	Date (month, day, year) 5/21/84	Amount of Each Disbursement This Period 20.00
I. Full Name, Mailing Address and ZIP Code Bay State Gas P.O. Box 55 Boston, MA 02297-0055	Purpose of Disbursement Utilities Disbursement for: X Primary ☐ General ☐ Other (specify):	Date (month, day, year) 5/21/84	Amount of Each Disbursement This Period 105.67
SUBTOTAL of Disbursements This Page (optional)			4,573.85
TOTAL This Period (last page this line number only)			

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SCHEDULE B

ITEMIZED DISBURSEMENTS

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

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Name of Committee (In Full)
Committee to Reelect Congressman Studds

	Purpose of Disbursement / Disbursement for	Date (month, day, year)	Amount of Each Disbursement This Period
A. Full Name, Mailing Address and ZIP Code Universal Badge & Label Co. 27 Kingston St. Boston, MA 02111	Buttons Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	5/23/84	210.00
B. Full Name, Mailing Address and ZIP Code Same	Buttons Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	6/15/84	420.00
C. Full Name, Mailing Address and ZIP Code Postmaster New Bedford, MA	Postage Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	5/4/84	20.00
D. Full Name, Mailing Address and ZIP Code Same	Postage Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	5/21/84	20.00
E. Full Name, Mailing Address and ZIP Code Same	Postage Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	6/12/84	20.00
F. Full Name, Mailing Address and ZIP Code Comelectric P.O. Box 2000 Cambridge, MA 02239	Electric service Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	5/21/84	106.14
G. Full Name, Mailing Address and ZIP Code Same	Electric service Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	6/1/84	68.92
H. Full Name, Mailing Address and ZIP Code Same	Electric service Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	6/13.84	30.74
I. Full Name, Mailing Address and ZIP Code Catalyst 2003 Commonwealth, Suite 21 Boston, MA 02135	Lists Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	5/22/84	1,000.00
SUBTOTAL of Disbursements This Page (optional)			1,895.80
TOTAL This Period (last page this line number only)			

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SCHEDULE B

ITEMIZED DISBURSEMENTS

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Name of Committee (in Full)
Committee to Reelect Congressman Studds

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Alltown Insurance 1030 Turnpike Canton, MA 02021	Insurance Disbursement for: X Primary ☐ General ☐ Other (specify):	5/25/84	150.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Names in the News 530 Bush St. San Francisco, CA 94108	Lists Disbursement for: X Primary ☐ General ☐ Other (specify):	5/31/84	1100.00
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Barnstable County Agri. Society Rte.151 E. Falmouth, MA 02536	Booth rental Disbursement for: X Primary ☐ General ☐ Other (specify):	6/14/84	202.50
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Sandra Horrigan 37 Signal Hill Dr. Dennis, MA 02638	Reimb. exp. phone Disbursement for: X Primary ☐ General ☐ Other (specify):	6/14/84	60.40
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Roger E. Caron 177 High St. P.O. Box 553 Norwell, MA 02061	Salary Disbursement for: X Primary ☐ General ☐ Other (specify):	4/30/84	83.53
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Same	Salary Disbursement for: X Primary ☐ General ☐ Other (specify):	5/10/84	83.53
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Same	Salary Disbursement for: X Primary ☐ General ☐ Other (specify):	5/21/84	83.53
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Same	Salary Disbursement for: X Primary ☐ General ☐ Other (specify):	5/30/84	167.06
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Robert Peter Fleischer 621 Harbor Dr. Annapolis, MD 21403	Salary Disbursement for: X Primary ☐ General ☐ Other (specify):	4/9/84	1,011.49
SUBTOTAL of Disbursements This Page (optional)			2,942.04
TOTAL This Period (last page this line number only)			

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SCHEDULE B

ITEMIZED DISBURSEMENTS

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Name of Committee (In Full)
Committee to Reelect Congressman Studds

	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Full Name, Mailing Address and ZIP Code Robert Peter Fleischer 621 Harbor Dr. Annapolis, MD 21403	Salary Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/30/84	1,011.49
B. Full Name, Mailing Address and ZIP Code Same	Salary Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	5/30/84	1,011.49
C. Full Name, Mailing Address and ZIP Code Same	Reimb. exp. travel, food Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/2/84	40.65
D. Full Name, Mailing Address and ZIP Code Same	Reimb. exp. travel Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/26/84	156.00
E. Full Name, Mailing Address and ZIP Code Same	Reimb. printing, postage paper supplies Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	5/2/84	1,361.38
F. Full Name, Mailing Address and ZIP Code Same	Reimb. exp. truck rental Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	5/10/84	428.87
G. Full Name, Mailing Address and ZIP Code Same	Reimb. exp. travel Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	6/7/84	240.00
H. Full Name, Mailing Address and ZIP Code Vann J. Snyder 8 Jay Rd. Scituate, MA 02066	Salary Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/2/84	736.62
I. Full Name, Mailing Address and ZIP Code Same	Salary Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/30/84	1,587.24
SUBTOTAL of Disbursements This Page (optional)			6,573.74
TOTAL This Period (last page this line number only)			

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SCHEDULE B

ITEMIZED DISBURSEMENTS

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Name of Committee (In Full)
Committee to Reelect Congressman Studds

	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Full Name, Mailing Address and ZIP Code Vann J. Snyder 8 Jay Rd. Scituate, MA 02066	Salary Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	5/30/84	1, 587.24
B. Full Name, Mailing Address and ZIP Code Same	Reimb. exp: phone, travel Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/25/84	352.22
C. Full Name, Mailing Address and ZIP Code Same	Reimb. exp. travel, rent Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	5/10/84	859.75
D. Full Name, Mailing Address and ZIP Code Robert A. Nickerson P. O. Box 1107 W. Chatham, MA 02669	Salary Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/2/84	915.96
E. Full Name, Mailing Address and ZIP Code Same	Salary Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/30/84	915.96
F. Full Name, Mailing Address and ZIP Code Same	Salary Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	5/30/84	915.96
G. Full Name, Mailing Address and ZIP Code Same	Reimb. exp. phone, gas Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	5/11/84	104.86
H. Full Name, Mailing Address and ZIP Code Same	Reimb. exp. phone, gas Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	5/21/84	210.04
I. Full Name, Mailing Address and ZIP Code Same	Reimb. exp. office supplies, postage Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	5/21/84	106.18
SUBTOTAL of Disbursements This Page (optional)			5, 968.17
TOTAL This Period (last page this line number only)			

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SCHEDULE B

ITEMIZED DISBURSEMENTS

Page ___ of ___ for LINE NUMBER 17
(Use separate schedule(s) for each category of the Detailed Summary Page)

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Name of Committee (In Full)
Committee to Reelect Congressman Studds

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for	Date (month, day, year)	Amount of Each Disbursement This Period
Eileen O'Brien 261 North St. Hingham, MA 02043	Salary Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/2/84	802.62
B. Full Name, Mailing Address and ZIP Code Same	Purpose of Disbursement: Salary Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/30/84	1,633.17
C. Full Name, Mailing Address and ZIP Code Same	Purpose of Disbursement: Salary Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	5/30/84	1,633.17
D. Full Name, Mailing Address and ZIP Code Same	Purpose of Disbursement: Reimb. exp. phone Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	5/23/84	70.21
E. Full Name, Mailing Address and ZIP Code Mary Lou Butler 38 Rosa's Lane Scituate, MA 02066	Purpose of Disbursement: Salary Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/2/84	247.30
F. Full Name, Mailing Address and ZIP Code Same	Purpose of Disbursement: Salary Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/30/84	498.16
G. Full Name, Mailing Address and ZIP Code Same	Purpose of Disbursement: Salary Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	5/30/84	498.16
H. Full Name, Mailing Address and ZIP Code Same	Purpose of Disbursement: Reimb. exp. postage phone, travel Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	5/10/84	104.52
I. Full Name, Mailing Address and ZIP Code Maureen E. Garde 145 Freeman St. Brookline, Ma 02146	Purpose of Disbursement: Salary Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	4/2/84	388.62
SUBTOTAL of Disbursements This Page (optional)			5,875.93
TOTAL This Period (last page this line number only)			

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ITEMIZED DISBURSEMENTS

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

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Name of Committee (in Full)

Committee to Reelect Congressman Studds

A. Full Name, Mailing Address and ZIP Code Maureen E. Garde 145 Freeman St. Brookline, MA 02146	Purpose of Disbursement Salary Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/30/84	Amount of Each Disbursement This Period 388.62
B. Full Name, Mailing Address and ZIP Code Same	Purpose of Disbursement Salary Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 5/30/84	Amount of Each Disbursement This Period 388.62
C. Full Name, Mailing Address and ZIP Code Kevin O'Reilly 17 Jan Marie Dr. Plymouth, MA 02360	Purpose of Disbursement Salary Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/6/84	Amount of Each Disbursement This Period 192.40
D. Full Name, Mailing Address and ZIP Code Same	Purpose of Disbursement Salary Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/13/84	Amount of Each Disbursement This Period 192.40
E. Full Name, Mailing Address and ZIP Code Same	Purpose of Disbursement Salary Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/23/84	Amount of Each Disbursement This Period 192.40
F. Full Name, Mailing Address and ZIP Code Same	Purpose of Disbursement Salary Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 4/30/84	Amount of Each Disbursement This Period 192.40
G. Full Name, Mailing Address and ZIP Code Same	Purpose of Disbursement Salary Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 5/11/84	Amount of Each Disbursement This Period 398.30
H. Full Name, Mailing Address and ZIP Code Same	Purpose of Disbursement Salary Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 5/30/84	Amount of Each Disbursement This Period 398.30
I. Full Name, Mailing Address and ZIP Code Same	Purpose of Disbursement Reimb. exp. bldg. supplies, postage Disbursement for: ☒ Primary ☐ General ☐ Other (specify):	Date (month, day, year) 5/3/84	Amount of Each Disbursement This Period 86.62
SUBTOTAL of Disbursements This Page (optional)			2,430.06
TOTAL This Period (last page this line number only)			

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ITEMIZED DISBURSEMENTS

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

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Name of Committee (In Full)

The Committee to Reelect Congressman Studds

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
Kevin O'Reilly 17 Jan Marie Dr. Plymouth, MA 02360	Reimb. exp.--food X	5/18/84	25.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
National Comm. for an Effective Congress 400 C. St. S.E. Washington, D.C. 20002	Consulting X		2,500.00 in kind
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			2,525.00
TOTAL This Period (last page this line number only)			$76,837.87

8504054783

ITEMIZED DISBURSEMENTS

LINE NUMBER 23
(Use separate schedule(s) for each category of the Detailed Summary Page)

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Name of Committee (in Full)

The Committee to Reelect Congressman Studds

A. Full Name, Mailing Address and ZIP Code MA Democratic State Comm. 11 Beacon St. Boston, MA 02108	Purpose of Disbursement Tickets Disbursement for: X Primary ☐ General ☐ Other (specify):	Date (month, day, year) 5/9/84	Amount of Each Disbursement This Period 25.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			25.00
TOTAL This Period (last page this line number only)			25.00

8504054786

A Shoo-In Before Coming Out

The Fight to Keep a Gay in Congress

By Randy Shilts
Chronicle Correspondent

Buzzard's Bay, Massachusetts

As a bone-chilling shower poured down upon a group of Girl Scouts dressed like pilgrims, 63-year-old Meryle Cassidy waved cheerfully to the smiling politicians looking for votes in their campaigns to unseat the area's six-term congressman, Gerry Studds.

The ambitious politicians, Democrat and Republican alike, all got Cassidy's smile and wave.

But none of them would get her vote. She said it would go to incumbent Studds — even though he found himself embarrassed last year when a 1974 tryst with a male congressional page was announced in Congress.

"What he does in his private life is his own business," said Cassidy, with a note of Yankee defiance. "He's a very intelligent man and has done a good job for us in Congress. If he keeps running for 50 more years, I'll keep voting for him for as long as I'm alive."

Studds' political career will depend on constituents like Cassidy. Just one year ago, Studds, who won his last term with 69 percent of the vote, was considered a shoo-in for re-election this year. But that was before he became the first and only acknowledged homosexual to sit in the Congress.



REP. GERRY STUDDS
Highest-ranking gay politician

Studds' re-election effort in the September primary presents perhaps the most tangible political challenge facing the gay movement this year, as gays struggle to re-elect the highest-ranking openly gay public official in the United States.

"Gerry's re-election is an extremely high priority for this year," said Jerry Berg of the Human Rights Campaign Fund. "He's the only member of Congress we've got."

Studds came to San Francisco recently for two fund-raisers, his second fund-raising appearance here this year, and easily entertains gay crowds with his campy humor. "I tried to explain to my constituents that I didn't say I was gay — I said I was fey," he told one group.

At the centennial parade in Buzzard's Bay, Studds' foes among both Democrats and Republicans conceded that they would not be in the race if it were not for the page scandal.

As a float depicting an old whaling boat rolled by, Studds' challenger Lew Crompton said he was asked to run by the Republican National Committee, which perceived "a great deal of vulnerability."

"A number of voters are still trying to sort this out," said Crompton, 45, who quit his job at the Environmental Protection Agency to return to the 10th Congressional District in southeastern Massachusetts and oppose Studds. "A lot of people's minds are open this year."

Studds also faces a strong primary challenge from Sheriff Peter Flynn of Plymouth County, a conservative Democrat who has represented much of Studds' district in the state Legislature. Like Crompton, Flynn stops short of attacking Studds for being gay, saying Studds instead violated the public trust by his relationship with a 17-year-old page.

"Being gay is not the problem -- it's not the issue," said Flynn, 44. "I don't think people would care if it was a male page or female page. It was the whole situation. This was a breach of trust."

Flynn has alluded to the youth of the page involved with the scandal — pointing to his own 17-year-old son during his announcement speech — and his campaign motto pointedly refers to himself as a man "that we can all be proud of."

Many people with whom Flynn shook hands, however, seemed reluctant to unseat Studds, who performed a minor political miracle in 1972 when he became the first Democrat in decades to represent the most Republican congressional district in Massachusetts.

"I'm from the old school — I didn't even know there was such a thing when I grew up," said Mary Dunbar, 73, as she watched the parade from the window of her gift shop. "But I'm for him all the way. He's still the same fine congressman he ever was. He approached the accusations strongly and faced it like a man."



Photo By Steve Ringman

63-YEAR-OLD MERYLE CASSIDY
'What he does in private is his own business'

Ex-Cop Convicted

Studds fundraiser may have violated federal campaign law

y ROBERT V. BURNS
nterprise Statehouse Bureau

BOSTON — A nightclub catering to Boston's gay ommunity has apparently made corporate contributions o the re-election campaign of U.S. Rep. Gerry Studds, -Cohasset, in violation of federal election laws.

Metro, a nightclub at 7 Landsdowne St. that specializes in parties for gays at least one night a week, held a Gerry Studds Benefit" on Sunday when patrons were eportedly each asked to donate $3 toward Studds' reelection campaign effort.

The manager of Metro, John Lyons, did not respond an an inquiry by The Enterprise to determine how much money was raised for Studds.

Metro is listed with the secretary of state's office as a corporation known as "9 Landsdowne Corp." of 9 Landsdowne St., with Sonia Loew Black the principal stockholder.

Federal election laws prohibit corporations from contributing money, goods or services of value to congressional candidates.

Frederick Eiland of the Federal Election Commission said violations of the law are determined after an investigation by commissioners who may receive complaints from any government agency or from an individual willing to file a sworn statement. He said much of the initial review falls on press and public scrutiny of the candidates campaign activities.

He said complaints remain confidential until the commission's investigtion is completed. Therefore, he could not confirm whether any complaint has been made concerning the Studds fund-raising event which was promoted in a Boston gay newsletter called the "Metro Sunday Times."

However, complaints are placed on public record after the investigation.

A signed letter from the publisher of the newsletter, George Tamsitt — described as the promotion manager for the club — noted that "...we will be hosting Gerry Studds and raising money for his re-election" April 15 at the club.

The newsletter also featured, on the back cover, a display advertisement calling attention to the "Gerry Studds Benefit," which was "Metro's declaration of support. . . show your support."

The advertisement said, "Proceeds to benefit Studds re-election to Congress."

There was no mention anywhere in the advertisement that it was paid for by anyone associated with the Studds campaign.

STUDDS—See Page 8

4/19/84

ON THE INSIDE

STUDDS

(Continued From page One)

The newsletter contained several advertisements for Boston businesses, including a construction company, a hairdresser and a nightclub-restaurant.

A note from the publisher asks, "Please support our supporters...the advertisers in the Metro Sunday Times."

Studds's campaign manager, Peter Fleishcher, told The Enterprise in a telephone conversation with the congressman's Washington office Wednesday that someone from the club called "two or three weeks ago" to suggest a fundraiser.

"We said fine if they were going to take care of everything," Fleischer said, explaining that the campaign did not pay any of the costs of running the fundraiser.

Eiland said: "The law specifically prohibits corporations from expending money to influence an election."

He said also that "if there is anything written" in a publication in the form of an advertisement to benefit a candidate "there should be a disclaimer" stating that the published material is being paid for by the candidate, his committee or an individual.

Eiland said that in the case of a benefit held at a nightclub, someone would be liable for "the usual, normal costs" associated with rental of the premises.

Usual penalties for violation of the statute, which is known as the Federal Election Campaign Act, run as high as $5,000 or the amount of money illegally donated, Eiland said, except when there is "willing or knowing"disregard of the law.

In that case, Eiland said, election commissioners could set a penalty as high as $10,000 or 200 percent of the violation amount, whichever is greater.

A peppy new song for San Francisco?

Gays hold fund-raiser for Studds

Aides checking rules on accepting donation

BOSTON -- Congressman Gerry Studds, D-Cohasset, will check with federal election officials before he accepts money from a fund-raiser held on "gay night" at the Boston nightclub Metro, a spokesman for the Congressman said yesterday.

Peter Fleischer said the problem was that Metro may have advertised for the event in "The Metro Sunday Times," a newsletter oriented toward the gay community. Federal election law forbids a corporation to contribute to a campaign and all advertising must be paid for by an individual or campaign organization.

Fleisher said the campaign committee paid for the actual fund-raiser, which was held Sunday. He said $3 was charged at the door; $2 went to Studds and $1 paid for the use of the nightclub.

He said the money had not yet been sent to the campaign and he did not know how much was collected.



File photo

Rep. Gerry Studds

Fleischer said owners of the Landsdowne Street nightclub approached Studds staff members and said they intended to hold a fund-raiser for the Congressman. "They asked us if we had any objections," Fleischer said. "Our reaction was, 'sure, if you want to do something and we don't have to put any money into it, terrific.' Who wouldn't accept an offer like that?"

Metro, a nightclub featuring bands, a disc jockey and video screens, is frequented by students from the several colleges in the area. Sunday night, when the fund-raiser was held, is known as "gay night," and set aside for members of the gay community. Studds, the only publicly acknowledged homosexual in Congress, did not attend.

Fleischer said that as long as campaign contributions are in accordance with federal election laws, Studds has no objection to gay organizations holding fund-raisers for him.

"We're seeking support from the entire district," Fleischer said. "We're not isolating out the gay vote or the nuclear freeze vote or the women's rights vote. We enjoy the support of all those groups."

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DAN J. BRADLEY
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WASHINGTON, D C 20013

P. [illegible]

Boston, MA 02114

Dear Friend,

On July 14, U.S. Congressman Gerry Studds (D-MA) walked to the lectern on the floor of the House of Representatives and delivered in strong, confident tones a statement unlike any previously made in our national legislature:

> "All Members of Congress," said Studds, "must cope with the challenge of initiating and maintaining a career in public office without destroying entirely the ability to lead a meaningful and emotionally fulfilling private life. It is not a simple task for any of us to meet adequately the obligations of either public or private life, let alone both. But these challenges are made substantially more complex when one is, as am I, both an elected public official and gay."

With those words, Congressman Studds became the first member of Congress to publicly affirm his homosexuality.

Studds' historic statement came during the course of his response to charges made by the House Committee on Standards of Official Conduct that he had engaged in an improper sexual relationship with a 17-year-old male page in 1973, during his first term in office.

Studds was not the first public official to have difficulties related to homosexual activity, but he was the first not to hide from his own identity; the first not to cite "alcoholism," "drug problems," "psychological pressures," or even "homosexual tendencies" as an excuse. Gerry Studds just admitted to an error in judgement, and stated without shame or sorrow that he is gay.

In so doing, Studds set a standard for courage and dignity that will make it far easier for others to be open about being gay. His speech on the floor prompted thousands of letters congratulating him for his decision, and expressing gratitude for the strength and eloquence of his words. Let me quote from three of those letters:

> "I saw, heard and re-read many times your speech to the House. I was dumbstruck, and moved to tears by your courage, pride, honesty, poise and resoluteness. If I ever, myself, rise even half so well to half so trying a moment, I think I shall consider my life, to that moment, a success and my dues -- such as any might reckon them -- fully paid. At last, a Congressman I can look up to, who represents <u>me</u>!" -- From New York

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"When I heard your statement to Congress on NPR recently, I lofted my sheetrock hammer across the room and cheered. A Congressman comes out with class! -- sure, measured voice, no half-baked apologies, "gay" rather than "homosexual." You have my deep respect for transforming what must be a lonely, traumatic event into a noble moment for us all...you have done a fine and brave thing for all of us." -- From North Carolina

"I was proud of you today when I saw you standing before the House making your precise, fine-tuned statement. I was proud of the way you looked, proud of what you said, proud of the way you said it. You affirmed my/our complex presence in this world. I am sorry that such an affirmation is contingent on what is clearly a painful and embarassing time for you and those you love. Thank you for not running away. Thank you for your courageous, public, personal response...There are millions of gay people, who are prouder of themselves because of the way you have chosen to publicly respond to the realities of your life." -- From Oregon

Gerry Studds' decision to be honest and open about himself was, he says, personally the best thing he has ever done. He feels great.

But, not everyone understands. It is likely that the refusal by Congressman Studds to be more visibly contrite about his past mistake, and about his sexual preference, in general, contributed to the decision by the House of Representatives to vote to censure him on the House floor. It is likely, as well, that the investigation concerning Studds which was made by the House Committee on Standards of Official Conduct, was far more extensive and exhaustive than it would have been if a heterosexual relationship had been involved. Consider, for example, that the Committee began investigating charges concerning misbehavior by Members of Congress in 1981 and 1982. How much time and how much work did it take to inquire all the way back to 1973 to expose a relationship which was, even according to the Committee, without coercion, which did not involve any preferential treatment, express or implied, which did not include any harassment of any kind, and which involved a young man who was for legal purposes, an adult?

During the course of its investigation, the Committee spent hundreds of thousands of dollars and interviewed hundreds of people, inquiring into virtually every phase of Congressman Studds' personal life for the past ten years. At the start, Studds refused to hire a lawyer. But ultimately, as the investigation went on, and friends and staff members were subjected to repeated interrogation, he relented. The legal bills ultimately exceeded $40,000, money Studds does not have.

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Recently, a group of supporters from Congressman Studds' district in Massachusetts, from Washington, and elsewhere around the country, established a Trust Fund to help defray these legal expenses. About one-half the money has already been raised. I would like to ask you to join in making a contribution to this Trust, the proceeds from which will be used exclusively to re-pay these legal fees.

By making such a contribution, you will do far more than help alleviate this debt. You will be telling Gerry Studds that you appreciate his decision to tell the truth about his sexuality, and his determination to insist that sexual preference is irrelevant to a person's performance in professional life.

In addition, you will bolster the groundswell of sentiment within the Gay Community -- a sentiment matched only by Studds' own Massachusetts constituents -- that he should run for re-election this fall. That decision will be, for him, an enormously difficult and intensely personal choice. A political campaign is always arduous under any circumstances, but in 1984, for Gerry Studds, it promises to be brutal indeed.

I know Gerry Studds, and I have followed with interest his career in Congress. During his 12 years in office, he has gained a reputation for hard work, accessibility, personal honesty, and intense dedication to the vital economic and environmental concerns of his district encompassing the southeastern Massachusetts coast. Above all, Congressman Studds has displayed throughout his career the kind of eloquence and wit so rarely found in politics today; an eloquence which has made him one of our most persuasive defenders of human rights and civil liberties both within the United States and in international affairs; and which -- as evidenced by his speech last July 14 -- grants him the ability to communicate his ideas with a unique and commanding strength.

Congressman Studds' constituents agree. After barely winning election for the first time in 1972, he has steadily increased his margin of victory. In 1982, he received 68 percent of the vote, and carried every town and precinct in his district.

But 1984 promises to be very different and a far more difficult kind of campaign. Several local politicians have announced their intention to campaign for Studds' seat, and he has been targeted by right-wing organizations as a prime candidate for defeat.

I believe it is important that Gerry Studds be re-elected. He is a superb Congressman. Our country needs many more with his talent and dedication. Simply by doing his job the way he has in the past, Studds will be serving his constituents, and making it easier every day for all of us to argue openly that sexual preference is no bar to competence, effectiveness or public respect.

A contribution to the Studds Trust Fund will have an important practical effect. It will tell Congressman Studds that he has the

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support he needs to make it through the year ahead. It will let him know that we deeply admire and respect the way he handled himself during the investigation and House vote. He has given thousands of gay men and lesbians who have faced similar allegations and inquiries into their personal lives reason to be proud.

By making a contribution to the Studds Trust Fund, you can send Gerry Studds your vote of confidence, to encourage him to run in 1984. You can send a message of friendship and support to a hard-working congressman who deserves the very best. Please make your check payable to the Studds Trust Fund and send it to my attention, c/o Dan J. Bradley, Co-Chair, Human Rights Campaign Fund, P.O. Box 1396, Washington, D.C. 20013.

Thank you for your continued support of the Human Rights Campaign Fund.

Sincerely,

Dan J Bradley

Dan J. Bradley
Co-Chair
Human Rights Campaign Fund

P.S. Congressman Gerry Studds is a co-sponsor of the federal gay civil rights legislation. He has spoken out frequently on issues of concern to gay men and lesbians.

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