



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 2560

DATE FILMED 3/29/91 CAMERA NO. 4

CAMERAMAN AS

91040332675

REPORTS ANALYSIS REFERRAL**TO****OFFICE OF GENERAL COUNSEL****DATE:** June 23, 1987**ANALYST:** Andrew Dodson

I. COMMITTEE: Fifth Congressional District
Democratic Committee
(C00149120)
Neil A. Dick, Treasurer
(May 20, 1986 to present)
Richard A. VanderMolen, Treasurer
(January 1, 1985 to May 19, 1986)
1642 Pontiac Road, SE
East Grand Rapids, MI 49506

II. RELEVANT STATUTE: 11 CFR 102.5(a)(1)(i)

III. BACKGROUND:

Receipt of Apparent Impermissible Funds from Unregistered Organizations

The 1986 30 Day Post-General Report filed by the Fifth Congressional District Democratic Committee ("the Committee") disclosed a total of \$8,000 received in apparent impermissible funds from two (2) unregistered Democratic party organizations. The funds were obtained in contributions of \$1,000 and \$7,000 on October 31, 1986 and November 3, 1986, respectively (Attachment 2).

A Request for Additonal Information ("RFAI") was sent on March 25, 1987. The RFAI asked the Committee to clarify whether the contributions were permissible as required by 11 CFR 102.5(a). The Committee was further advised to either refund any impermissible funds to the donors or transfer the funds, with the donors' consent, to an account not used to influence federal elections (Attachment 3).

On April 16, 1987, the Reports Analysis Division sent a Second Notice to the Committee which stated that the Commission had not received a response to the RFAI of March 25, 1987 (Attachment 4).

21040332676

**FIFTH CONGRESSIONAL DISTRICT DEMOCRATIC COMMITTEE
REPORTS ANALYSIS OGC REFERRAL
PAGE 2**

On April 21, 1987, the Committee filed a response to the RFAI (Attachment 5). The Committee stated that the \$1,000 from the Barry County Democratic Committee was composed of funds obtained by contributions from individuals and contained no corporate or labor organization funds. Of the remaining \$7,000, the Committee transferred \$2,000 to the Fifth District Democratic Administrative Fund, a non-federal account, and is attempting to raise sufficient funds to enable the Committee to transfer the balance of the contribution received from the Michigan Democratic State Central Committee.* A photocopy of the transfer check, dated April 21, 1987, was attached to the response.

On April 22, 1987, the Michigan Democratic Party sent a letter to the Reports Analysis Division explaining that the \$7,000 transfer was presumably deposited into the Committee's federal account in error (Attachment 6). A copy of a letter requesting that the Committee transfer the funds to its non-federal account was attached.

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

* / This entity is The Michigan Democratic Party's non-federal account.

21040332677

2 1 0 4 0 3 3 2 6 7 8

FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (85-86)

DATE 21MAY87
PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
FIFTH CONGRESSIONAL DISTRICT DEMOCRATIC COMMITTEE				PARTY QUALIFIED	ID #C00149120	
1985	MID-YEAR REPORT	25	27	1JAN85 -30JUN85	4	85FEC/379/3001
	YEAR-END	26	24	1JUL85 -31DEC85	4	86FEC/402/2139
1986	STATEMENT OF ORGANIZATION - AMENDMENT			2JUN86	3	86FEC/416/2508
	YEAR-END	39	1,535	24NOV86 -21JAN87	8	87FEC/466/1293
	APRIL QUARTERLY	8	383	1JAN86 -31MAR86	4	86FEC/416/2511
	1'ST LETTER INFORMATIONAL NOTICE			1JAN86 -31MAR86	1	86FEC/434/4350
	JULY QUARTERLY	89	16	1APR86 -30JUN86	5	86FEC/426/4129
	OCTOBER QUARTERLY	9	12	1JUL86 -30SEP86	5	86FEC/445/3734
	PRE-GENERAL	0	0	1OCT86 -15OCT86	3	86FEC/445/3096
	POST-GENERAL	8,003	4,102	16OCT86 -24NOV86	7	86FEC/445/3727
	POST-GENERAL - AMENDMENT	-	-	16OCT86 -24NOV86	4	87FEC/466/2126
	POST-GENERAL - AMENDMENT	-	-	16OCT86 -24NOV86	3	87FEC/466/2271
	REQUEST FOR ADDITIONAL INFORMATION			16OCT86 -24NOV86	3	87FEC/463/5235
	REQUEST FOR ADDITIONAL INFORMATION 2ND			16OCT86 -24NOV86	4	87FEC/465/2334
TOTAL		8,199	0 6,099	0	50	TOTAL PAGES

All reports have been reviewed.

Ending cash on hand as of 12/31/86 : \$3088.46

Total debts and obligations owed to the Committee as of 12/31/86 : \$.00

Total debts and obligations owed by the Committee as of 12/31/86 : \$.00*

*This figure does not include \$5,000 that the Committee subsequently owed to its Administrative Fund.
as a result of its response to an RFAI.

SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedule for each category of the Detailed Summary Page

PAGE 01

FOR LINE NUMBER

116

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

NAME OF COMMITTEE (in Full)

Fifty (CONGRESSIONAL) DEMOCRATIC COMMITTEE

A. Full Name, Mailing Address and ZIP Code
 BARRY COUNTY DEMOCRATIC COM. A.
 P.O. Box 301
 HAZLETON, PA 19098

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

Name of Employer

N/A

Occupation

N/A

Aggregate Year-to-Date > 0 1,000.00

Date (month, day, year)

10-31-86

Amount of Each Receipt this Period

1,000.00

B. Full Name, Mailing Address and ZIP Code

Middleton Democratic State
 Central Committee
 Louisville, KY 40203

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

Name of Employer

N/A

Occupation

N/A

Aggregate Year-to-Date > 0 7,000.00

Date (month, day, year)

11-3-86

Amount of Each Receipt this Period

7,000.00

C. Full Name, Mailing Address and ZIP Code

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

Name of Employer

Occupation

Aggregate Year-to-Date > 0

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 > 0

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 > 0

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 > 0

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 > 0

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)



FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20543

HQ-2

NR 25137

Neil A. Dick, Treasurer
Fifth Congressional District
Democratic Committee
1642 Pontiac Road, S.E.
Grand Rapids, MI 49506

Identification Number: C00149120

Reference: 30 Day Post-General Report (10/16/86-11/24/86)

Dear Mr. Dick:

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

-Schedule A of your report (pertinent portion(s) attached) discloses a contribution(s) from an organization(s) which is not a political committee registered with the Commission. Under 11 CFR 102.5(b), organizations which are not political committees under the Act must either: 1) establish a separate account which contains only those funds permitted under the Act, or 2) demonstrate through a reasonable accounting method that the organization has received sufficient funds subject to the limitations and prohibitions in order to make the contribution.

Please clarify whether the contribution(s) received from the referenced organization(s) is permissible, as required by 11 CFR 102.5(a). To the extent that your committee has received funds which are not permissible, the Commission recommends that you refund the impermissible amount(s) to the donor(s) in accordance with 11 CFR 103.3(b). If you choose to transfer the funds to an account not used to influence federal elections, the Commission advises that you inform the contributor(s) of your intent and provide the contributor(s) with the option of receiving a refund. Please inform the Commission in writing and provide a photocopy of your check(s) for the refund(s) or transfer(s)-out. Contributions which are refunded should be disclosed on Schedule B for Line 26a of your next report; those which are transferred-out should be disclosed on Schedule B for Line 20 or Line 27, as appropriate.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2400.

Sincerely,

Andrew Polson

Andrew Dodson
Reports Analyst
Reports Analysis Division



FEDERAL ELECTION COMMISSION

WASHINGTON DC 20501

NO-3

April 16, 1987

**Neil A. Dick, Treasurer
Fifth Congressional District
Democratic Committee
1642 Pontiac Road, SE
Grand Rapids, MI 49506**

Identification Number: C00149120

Reference: 30 Day Post-General Report (10/16/86-11/24/86)

Dear Mr. Dick:

This letter is to inform you that as of April 15, 1987, the Commission has not received your response to our request for additional information, dated March 25, 1987. That notice requested information essential to full public disclosure of your Federal election financial activity and to ensure compliance with provisions of the Federal Election Campaign Act (the Act). A copy of our original request is enclosed.

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Andrew Dodson on our toll-free number (800) 424-9530 or our local number (202) 376-2480.

Sincerely,

John D. Gibson
John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosure

RECEIVED AT THE FEC

87 APR 23 AM 10:34

April 21, 1987

ATTACHMENT 5
1 of 4

FIFTH CONGRESSIONAL DISTRICT
DEMOCRATIC COMMITTEE
1642 Pontiac Dr. S.E.
East Grand Rapids, MI 49506
(616) 436-3507

Mr. Andrew Dodson
Reports Analyst
FEDERAL ELECTION COMMISSION
Reports Analysis Division
Washington, D.C. 20463

Re: 30 Day Post-General Report
Letter of April 16, 1987
Identification #C00149120

Dear Mr. Dodson:

We are in receipt of your April 16, 1987 letter and must apologize for the delay in responding. Your March 25 letter did not arrive until April 1, and I was out of town until April 10.

We were unaware of the status of the funds received for the Federal Election effort this past fall, and have taken the following steps to rectify the problem:

1. The Barry County Democratic Committee will be providing details and a letter indicating that the funds used in this contribution were received in total from individuals for the purpose of fund-raising in this election. There were no corporate or labor organization or similar organization monies used for this purpose. This documentation will be forwarded to your attention within the next few days. This accounts for \$1,000 of the total.
2. There has been a separate administrative group established in the district with a separate fund activity. This group, called the Fifth District Democratic Administrative Fund is under the direction of Mike LaVean, Chairman, and this writer as Treasurer. It is not a Federal committee, and it's address is Box 235, Saranac, Michigan, 49881.
3. The Fifth Congressional District Democratic Committee has immediately transferred \$2,000 to the above fund. A copy of the check is attached to this letter.

-Continued-

87 APR 23 AM 10:34

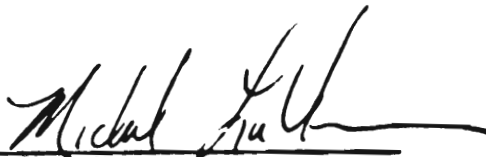
Mr. Andrew Lindson
April 21, 1987
Page -2-

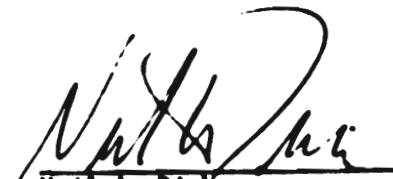
4. The Fifth Congressional District Democratic Committee has established an immediate intense effort to obtain necessary loans for an additional \$5,000 to be able to have the necessary funds to transfer to the Administrative fund. This will be done by individual loans and specific fund-raising from key individuals within the district.
5. We have drafted letters to both parties that made the contributions, notifying them of our transfer. In verbal conversations with representatives of both groups, we have been told that they confirm the transfer.

We believe the preceding action fully responds to your concerns. Additional documentation mentioned will be forwarded as required. If you have any questions, please contact us. It is our intent to cooperate fully with the rules and we appreciate your patience with us. Thank you for your consideration.

Sincerely,

FIFTH CONGRESSIONAL DISTRICT DEMOCRATIC COMMITTEE


Mike LaVean
Chairman


Neil A. Dick
Treasurer

Att.

FIFTH CONGRESSIONAL DISTRICT
DEMOCRATIC COMMITTEE
ALLEGAN, BARRY, IONIA, KENT,
NEWAYGO COUNTIES
GRAND RAPIDS, MI

1074

74-17/724

APR 21 10 57

PAY TO THE
ORDER OF

FIFTH DISTRICT DEMOCRATIC ADMINISTRATIVE FUND

\$ 2,300.00

TWO - THOUSAND - AND - ZERO - DOLLARS

XX DOLLARS

UNION BANK

And Trust Company, N.A. • Grand Rapids, MI 49503

FOR TRANSFER OF FUNDS - NON-FEDERAL

Walter Welch

⑆001074⑆⑆072400175⑆ 923 130-4⑆

27104963

67034662129
FIFTH CONGRESSIONAL DISTRICT
DEMOCRATIC COMMITTEE
1642 Pontiac Dr. S.E.
East Grand Rapids, MI 49506



CERTIFIED
No 618470
MAIL

Mr. Andrew Dodson
Reports Analyst
FEDERAL ELECTION COMMITTEE
Reports Analysis Division
Washington, D.C. 20463

87 APR 23 AM 11:34

RECEIVED AT THE FEC.

Michigan Democratic Party

Harl Kennedy House
626 Townsend
Lansing, Michigan 48233
(313) 371-8410

April 22, 1967

Andrew Dodson
Reports Analysis Division
Federal Election Commission
Washington, D.C. 20463

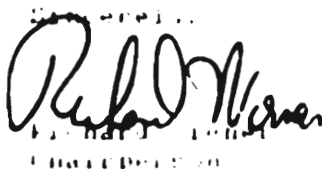
Dear Mr. Dodson:

This letter is in reference to your inquiries of March 25 and April 16, 1967, regarding a contribution made by the Michigan Democratic State Central Committee and deposited in the federal account of the Fifth Congressional District Democratic Committee.

The Michigan Democratic State Central Committee, contrary to the information contained in your letter, does maintain a federal account under the name Democratic Campaign Committee. The Michigan Democratic State Central Committee is an account which reports pursuant to state, but not federal, law.

The check issued to the Fifth Congressional District Democratic Committee was presumably deposited in its federal account in error. Accordingly, I have written to its treasurer and asked that it transfer \$1,000.00 from its federal account to a non-federal account. A copy of that letter is enclosed.

I hope that this resolves the issue at hand. Please advise if further action is required.


Robert W. Kerner
Chairman

Enclosure

EX-HONORABLE Chairman: HELEN BOOT HUBERT HOLLEY Vice Chairperson: GRACE HERRINGTON Recording Secretary: ROBERT W. KERNER Corresponding Secretary: THOMAS R. BORDY Treasurer: JOHN F. HARRIS Public Campaign: SHIRLEY BOBSON HILL Legislative Campaign: CARL E. HARRIS, JR. Public: ROBERT W. KERNER, JR. WILLIAM COLEMAN YOUNG Members of the National Committee: LIBBY CHANDLER, JAMES CLARK, BERTHIE GONZALES, BEN HARRIS, EVELYN HARRIS, JACK HARRIS, GRACE HARRIS, ROBERT W. KERNER, JR., BOBBI L. LARSEN, HELEN WILSON Officers-at-Large:

(Page 2 of 2)

[illegible]

21040332639
FEDERAL ELECTION COMMISSION
999 E Street, N.W.
Washington, D.C. 208463

FIRST GENERAL COUNSEL'S REPORT

RAD REF: 87L-21
STAFF MEMBER
Sandie Dunham

87 DEC -1 PM 4:59

EXECUTIVE SESSION

DEC 08 1987

SOURCE OF MUR: INTERNALLY GENERATED

RESPONDENTS: Fifth Congressional District Democratic Committee and Neil A. Dick, as treasurer

RELEVANT STATUTES: 2 U.S.C. § 441a
2 U.S.C. § 441b
11 C.F.R. § 102.6(a)(iv)

INTERNAL REPORTS

CHECKED: FEC Disclosure Documents

FEDERAL AGENCIES

CHECKED: N/A

I. GENERATION OF MATTER

The Fifth Congressional District Democratic Committee and Neil A. Dick, as treasurer, were referred to the Office of General Counsel by the Reports Analysis Division ("RAD") for accepting \$7,000 from an unregistered, non-federal organization during the 1986 calendar year.

SUMMARY OF ALLEGATIONS

The 1986 30 Day Post-General Report filed by the Fifth Congressional District Democratic Committee ("the Committee") disclosed \$7,000 received from the Michigan Democratic State Central Committee, an unregistered Democratic party organization. The contribution was received November 3, 1986. This same report also disclosed \$1,000 from the Barry County Democratic Committee, another unregistered, non-federal organization.

A Request for Additional Information ("RFAI") was sent on March 25, 1987. The RFAI asked the Committee to clarify whether the contribution was permissible as required by 11 C.F.R. 102.5(a). The Committee was further advised to either refund any impermissible funds to the donors or transfer the funds, with the donors' consent, to an account not used to influence federal elections.

On April 16, 1987, RAD sent a Second Notice to the Committee which stated that the Commission had not received a response to the RFAI of March 25, 1987.

On April 21, 1987, the Committee responded to the RFAI. The response stated that the Committee transferred \$2,000 of the \$7,000 contribution to the Fifth District Democratic Administrative Fund, a non-federal account, and reported it was attempting to raise sufficient funds to enable it to transfer the balance of the \$7,000 contribution received from the Michigan Democratic State Central Committee. The Committee also alleged the \$1,000 from the Barry County Democratic Committee was composed of funds obtained by contributions from individuals and contained no corporate or labor organization funds.

On April 22, 1987, the Michigan Democratic Party sent a letter to RAD explaining that the \$7,000 contribution from the Michigan Democratic State Central Committee was presumably deposited into the Committee's federal account in error. A letter from the Michigan Democratic Party was sent to the Committee on the same day requesting the transfer of the \$7,000

01040332690

II. FACTUAL AND LEGAL ANALYSIS

11 C.F.R. § 102.6(a)(ii)^{1/} states transfers of funds may be made without limit on amount between or among State party

1/ RAD referred the Committee for a possible violation of 11 C.F.R. § 102.5(a)(1)(i). However, because the committees are affiliated it appears to be a violation of 2 U.S.C. § 102.6(a)(iv).

committees and subordinate party committees whether or not such committees are affiliated. The Barry County Democratic Committee, the Fifth Congressional District, the Administrative Fund, the Campaign Committee and the State Central Committee are all committees of the Democratic Party in the State of Michigan. Therefore, all of these organizations are permitted to transfer unlimited amounts between and among each other.

However, pursuant to 11 C.F.R. § 102.6(a)(iv) transfers between State party committees and subordinate party committees can only be made from funds which are permissible under the Act. Both the Administrative Fund and the State Central Committee are non-federal accounts. Because Michigan law permits labor unions to contribute to political committees and because the funds transferred may not comply with federal limitations on contributions, it appears likely that the Committee violated 2 U.S.C. §§ 441a and 441b and 11 C.F.R. § 102.6(a)(iv) by accepting and depositing the funds transferred by the State Central Committee which were intended for deposit into the Administrative Fund.

The Michigan Democratic Party wrote a letter to RAD (Attachment 1, page 13) and stated that the \$7,000 was presumably deposited in the Fifth Congressional District's federal account in error. It also indicated that the Fifth Congressional District had been instructed to transfer the \$7,000 into a non-federal account. Because it appears that the transfer from the State Central Committee was not intended to influence any federal

21040832522

election, neither the definition of contribution or expenditure under the Act is satisfied. See 2 U.S.C. §§ 431(8)(A) and 431(9)(A). Where no contribution or expenditure for federal purposes is made, the definition of a political committee is not satisfied under 2 U.S.C. § 431(4). Thus there are no registration and reporting requirements under 2 U.S.C. §§ 433 and 434 involved in connection with the non-federal accounts.^{2/}

Additionally, Michigan Election law allows each committee to maintain only one account. This is another reason for the different state and local districts having two separate committees set up in conjunction with each other. Therefore, to require the State Central Committee and the Administrative Fund to register because the transfer was misdeposited into the committee with the federal account, where the money was intended for non-federal purposes, would defeat the purpose setting up separate committees in conjunction with each other for maintaining a non-federal and a federal account.

Accordingly, this Office is making no recommendation with regard to the registration of the State Central Committee and the Administrative Fund. However, this Office does not know whether the \$1,000 transfer from the Barry County Democratic Committee came from a federal or non-federal account. Therefore, this

^{2/} In an analagous situation see MUR 2105, in which non-federal accounts were not considered to have become reporting political committees because they were part of entities with already reporting federal accounts.

3
9
3
2
3
3
0
4
0
1
9

Office proposes to send the attached questions to the Fifth Congressional District concerning Barry County Democratic Committee.

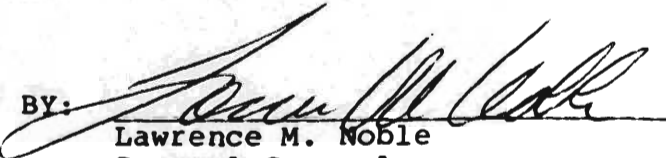
RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe that Fifth Congressional District Democratic Committee and Neil A. Dick, as treasurer, violated 2 U.S.C. § 441a and 2 U.S.C. § 441b and 11 C.F.R. § 102.6(a) (iv).
3. Approve and send the attached questions to the Fifth Congressional District Democratic Committee and Neil A. Dick, as treasurer.
4. Approve the attached letter.

Date

12/1/87

BY:


Lawrence M. Noble
General Counsel

Attachments:

- 1-Referral Materials
- 2-Proposed Letter and Factual and Legal Analysis
- 3-Proposed Questions

91040332694



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/SUSAN GREENLEE S.G.

DATE: DECEMBER 3, 1987

SUBJECT: OBJECTION TO RAD Ref. 87L-21: First General
Counsel's Report
signed Dec. 1, 1987

The above-captioned document was circulated to the
Commission on Wednesday, December 2, 1987, at 11:00 A.M.

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

Commissioner Aikens	_____
Commissioner Elliott	_____ X _____
Commissioner Josefiak	_____
Commissioner McDonald	_____
Commissioner McGarry	_____
Commissioner Thomas	_____

This matter will be placed on the Executive Session
agenda for December 8, 1987.

Please notify us who will represent your Division
before the Commission on this matter.

210403325

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Fifth Congressional District) RAD Referral 87L-21 (MUR 2560)
Democratic Committee and)
Neil A. Dick, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of December 8, 1987, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions with respect to RAD Referral 87L-21:

1. Open a Matter Under Review (MUR).
2. Find reason to believe that Fifth Congressional District Democratic Committee and Neil A. Dick, as treasurer, violated 2 U.S.C. § 441b and 11 C.F.R. § 102.6(a)(iv).
3. Direct the Office of General Counsel to send appropriate questions to the Fifth Congressional District Democratic Committee and Neil A. Dick, as treasurer, and to send an appropriate letter.

Commissioners Aikens, Elliott, Josefiak, McDonald, McGarry, and Thomas voted affirmatively for the decision.

Attest:

12-9-87

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

91040332696



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 21, 1987

Neil A. Dick, Treasurer
Fifth Congressional District
Democratic Committee
1642 Pontiac Road, SE
East Grand Rapids, MI 49506

RE: MUR 2560
Fifth Congressional
District Democratic
Committee and Neil A.
Dick, as treasurer

Dear Mr. Dick:

On December 8, 1987, the Federal Election Commission found that there is reason to believe the Fifth Congressional District Democratic Committee ("Committee") and you, as treasurer, violated 2 U.S.C. § 441b and 11 C.F.R. § 102.6(a)(iv). The 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 the Committee and you, as treasurer. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office, along with answers to the enclosed question, within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information demonstrating that no further action should be taken against the Committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of the General Counsel may recommend that

21040332597

Neil A. Dick, Treasurer
Page 2

pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, the Commission will not entertain requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent.

Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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 authorizing such counsel to receive any notifications and other communications from the Commission.

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 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 Sandra Dunham, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,



Scott E. Thomas
Chairman

Enclosures

Factual and Legal Analysis
Procedures
Designation of Counsel Form
Question

21040332698

QUESTION

TO: Neil A. Dick, Treasurer
Fifth Congressional District Democratic
Committee

Please submit an answer in writing and under oath to the question set forth below within 15 days of your receipt of this request.

1. The 1986 30 Day Post-General Report listed a \$1,000 contribution from the Barry County Democratic Committee. State whether this Committee has either a federal or non-federal account or both. Please describe your procedures for determining whether this contribution came from a federal or a non-federal account.

91540332699

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: Fifth Congressional District **MUR:** 2560
Democratic Committee and Neil A.
Dick, as treasurer

21040332700
The 1986 30 Day Post-General Report filed by the Fifth Congressional District Democratic Committee (the "Committee") disclosed \$7,000 received from the Michigan Democratic State Central Committee, an unregistered Democratic party organization. The contribution was received November 3, 1986. This same report also disclosed \$1,000 from the Barry County Democratic Committee, another unregistered, non-federal organization.

A Request for Additional Information ("RFAI") was sent on March 25, 1987. The RFAI asked the Committee to clarify whether the contribution was permissible as required by 11 C.F.R. 102.5(a). The Committee was further advised to either refund any impermissible funds to the donors or transfer the funds, with the donors' consent, to an account not used to influence federal elections.

On April 16, 1987, RAD sent a Second Notice to the Committee which stated that the Commission had not received a response to the RFAI of March 25, 1987.

On April 21, 1987, the Committee responded to the RFAI. The response stated that the Committee transferred \$2,000 of the \$7,000 contribution to the Fifth District Democratic Administrative Fund, a separate administrative group with a non-federal account, and reported it was attempting to raise sufficient funds to enable it to transfer the balance of the contribution received from the Michigan Democratic State Central Committee. The Committee also stated that the \$1,000 from the Barry County Democratic Committee was composed of funds obtained by contributions from individuals and contained no corporate or labor organization funds.

The Committee transferred the remaining \$5,000 to the Fifth District Democratic Administrative Fund on June 30, 1987.

On April 22, 1987, the Michigan Democratic Party sent a letter to RAD explaining that the \$7,000 contribution from the Michigan Democratic State Central Committee was presumably deposited into the Committee's federal account in error. A letter from the Michigan Democratic Party was sent to the Committee on the same day requesting the transfer of the \$7,000 from the federal to the non-federal account.

The Committee operates as the federal account established and maintained by the Fifth Congressional District of the Democratic Party (the "Fifth Congressional District") to finance its political activity in connection with federal elections. The Fifth Congressional District is set up in conjunction with an

administrative committee under the name of Fifth District Democratic Administrative Fund (the "Administrative Fund") which finances non-federal political activity. The Michigan Democratic Party also has two committees; the Democratic Campaign Committee (the "Campaign Committee") to finance federal activities and the second, the Michigan Democratic State Central Committee, (the "State Central Committee") to administer its non-federal account.

11 C.F.R. § 102.6(a)(ii) states transfers of funds may be made without limit on amount between or among state party committees and subordinate party committees whether or not such committees are affiliated. The Barry County Democratic Committee, Fifth Congressional District, Administrative Fund, Campaign Committee and State Central Committee are all committees of the Democratic Party in the State of Michigan. Therefore, all of these organizations are permitted to transfer unlimited amounts between each other.

The Administrative Fund and the State Central Committee are set up as non-federal accounts and pursuant to 11 C.F.R. § 102.6(a)(iv) transfers between State party committees and subordinate party committees can only be made from funds which are permissible under the Act. Due to the fact Michigan law permits labor unions to contribute to political committees it appears likely that the committee violated 2 U.S.C. § 441b and 11 C.F.R. § 102.6(a)(iv) by accepting and depositing the funds

transferred by the State Central Committee which were intended for deposit into the Administrative Fund.

21040332703
The Michigan Democratic Party wrote a letter to RAD and stated that the \$7,000 was presumably deposited in the Fifth Congressional District's federal account in error. It also indicated that the Fifth Congressional District had been instructed to transfer the \$7,000 into a non-federal account. Because it appears that the transfer from the State Central Committee was not intended to influence any federal election, the meaning of contribution or expenditure under the Act is not satisfied. Where no contribution or expenditure for federal purposes is made, the definition of a political committee is not effected under 11 C.F.R. § 110.5, which in turn will fail to trigger the registration and reporting requirements under 2 U.S.C. § 433 and § 434. To require the State Central Committee and the Administrative Fund to register because the transfer was misdeposited into the committee with the federal account, where the money was intended for non-federal purposes, would defeat the purpose of setting up separate committees in conjunction with each other for maintaining a non-federal and federal account.

Therefore, there is reason to believe that the Fifth Congressional District Democratic Committee and Neil A. Dick, as treasurer, violated 2 U.S.C. § 441b and 11 C.F.R. § 102.6(a)(iv).

Greiner

Neil A. Dick
Executive Vice President

Registered Mail

Confidential

December 28, 1987

Mr. Scott E. Thomas, Chairman
Federal Election Commission
Washington, D.C. 20463

Dear Mr. Thomas:

I am in receipt of your letter which arrived on December 26, 1987 and I must implore upon you for an extension of time. Several key facts should be related to you.

On July 20, 1987, I formally resigned as treasurer of the committee and withdrew from all activity, turning all records over to Mr. Mike Levine, Chairman, Box 235, Saranac, Michigan 48881. I will contact Mr. Levine to find out the present status.

As far as I know, the amounts of monies deposited by the Michigan Democratic State Central Committee should have been returned after receipt of appropriate funds. The Barry County Democratic Committee was to provide proof to the committee that its \$1,000 was provided within the appropriate rules. Since I no longer have any records, I have no way of knowing if these actions were taken.

With many individuals away for the holidays, I may not be able to contact appropriate people until after the new year. I anticipate that with the lack of any organization and with the apparent lack of knowledge on regulations, it will take some time for me to gain access to information. (These were the reasons that I resigned after having only accepted the position with the understanding that there would be organizational follow-up.)

I have enclosed copies of my letters to Mr. Andrew Dodson of your office and to Mr. Mike Levine. I have also copied this letter and your correspondence to Mr. Rick Wiener, Chairperson, Michigan Democratic Party, who was advising us at the time. I find the actions to be highly embarrassing and personally resent being the recipient of so much misinformation on campaign contributions. I am writing this letter from my office to expedite the action and can be contacted either at my workplace or at my home address which is the 1642 Pontiac Road address you formerly used.

6CC # 5047
RECEIVED
FEDERAL ELECTION COMMISSION
Greiner & Co. GENERAL COUNSEL
82 Ionia Avenue, N.W.
Grand Rapids, Michigan 49504-3044
(616) 456-3507

(formerly Daverman Associates)

87 DEC 30 PM 3:29

RECEIVED
FEDERAL ELECTION COMMISSION

Greiner

Mr. Scott E. Thomas
December 28, 1987
Page 2

Please understand that as treasurer without any organization, I only deposited funds given to the party and made out some of the checks - neither of which I had much control over and, of course, want to clear up this action and any dispersions cast on my name as soon as possible. Please let me know as to the status of an extension which will hopefully take matters through until the end of January 1988.

Thank you for your cooperation.

Sincerely,

GREINER, INC.



Neil A. Dick
Executive Vice President

NAD:npr

Enclosures

cc: Terry Lint
UAW Regional 1-D
P. O. Box 4
Grand Rapids, MI 49501

Rick Weiner
Michigan Democratic Party
Hart-Kennedy House
606 Townsend
Lansing, MI 48933

Mike Levine

9104032705

Daerman

Daerman Associates, Inc.
82 Ionia Avenue, N.W.
Grand Rapids, Michigan 49503
(616) 456-3507

Neil A. Dick
President

A Greiner Engineering, Inc. Company

July 20, 1987

Mr. Andrew Dodson
Reports Analyst
Federal Election Commission
Reports Analysis Division
Washington, D.C. 20463

RE: Follow-up to:
April 21, 1987 Letter
Fifth District Democratic Committee Congressional
(1) Number C00149120

Dear Mr. Dodson:

As a follow-up to the above referenced letter, the committee has raised an additional \$5,000 in funds and has transferred these funds to the Administrative Fund. The total amounts transferred during this period is now \$7,000.

The Committee will be filing the regular July 31, 1987 report outlining source of these funds. Effective with that filing I will have completed my duties as Treasurer since I have tendered my resignation effective July 15, 1987. All future correspondence should be directed to Mike LaVean at Box 235, Saranac, MI 48881.

Thank you for your continued cooperation.

Sincerely,

DAVERMAN ASSOCIATES, INC.


Neil A. Dick
NAD:blr

Daerman

Professionals...Renewing a Nation. Committed to Excellence

Attachments

*The Attachments
COPIES GO WITH
THIS LETTER ONLY
do not put these attachments
with any other letters.*

21040332706

Daverman

Neil A. Dick
President

July 20, 1987

Mr. Mike LaVean, Chairman
Fifth Congressional District
Democratic Committee
P.O. Box 235
Saranac, Michigan 48881

PERSONAL/CONFIDENTIAL

RE: Resignation

Dear Mike:

I regret to inform you that I must resign as Treasurer of the Fifth Congressional District Democratic Committee effective immediately. I will complete the six month filing of the report due on July 31, 1987 by the Federal Election Committee and will cease activities upon filing.

The reasons for my resignation are many. I definitely want to be active in the Democratic Party as I have been for many years, but not just doing an election report that gets very little support from others.

I believe it was a mistake to think that taking the Treasurers position would really bring me into a meaningful level of activity.

The most recent meeting that I attended, which was evidently the first meeting of any sort in a very long time, illustrated to me that if I really want to have a meaningful role, it will not be at a local level.

Please arrange to have the records and check books picked up. Those documents are available at my office.

I do hope to, in some manner, become involved in the Party and will always be available to help support local activity. It seems that my many requests to Lansing have fallen on deaf ears and obviously the Governor has not had time or inclination to follow-up on my expressed desires.

Daverman Associates, Inc.
82 Ionia Avenue, N.W.

Daverman

Professionals...Renewing a Nation, Committed to Excellence

Sent 7-21
A Copy of
✓ Dodson's letter
✓ Lin's letter
✓ Lin's letter attaching
✓ Perkins letter.

2104032707

Daverman

Daverman Associates, Inc.
82 Ionia Avenue, N.W.
Grand Rapids, Michigan 49503
(616) 456-3507

Neil A. Dick
President

A Greiner Engineering, Inc. Company

July 20, 1987

Mr. John Perkins, Director
Committee on Political Education
815 16th Street, N.W.
Washington, D.C. 20006

Dear Mr. Perkins:

Enclosed is a signed copy of the acknowledgement. I have also attached copies of the deposit slip and the check endorsement to show that it has been deposited.

Because of the past problems and general lack of organizational support in this district, I have just recently tendered my resignation. You can follow-up with Mike LaVean, Chairman, Fifth Congressional District Democratic Committee, Box 235 Saranac, Michigan 48881. You can also follow-up with (Terry Lint at Region 11), UAW who is aware of these matters.

Thank you for your assistance.

Sincerely,

DAVERMAN ASSOCIATES, INC.


Neil A. Dick
NAD:blr

21040332708



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 7, 1988

Neil A. Dick, Treasurer
Fifth Congressional District
Democratic Committee
1642 Pontiac Road, S.E.,
East Grand Rapids, MI 49506

RE: MUR 2560
Fifth Congressional District
Democratic Committee and
Neil A. Dick, as treasurer

Dear Mr. Dick:

This is in response to your letter dated December 28, 1987, which we received on January 4, 1988, requesting an extension until the end of January to respond to reason to believe that the Fifth Congressional District Democratic Committee and you, as treasurer, violated 2 U.S.C. § 441b and 11 C.F.R. § 102.6(a)(iv). After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by close of business on January 28, 1988.

If you have any questions, please contact Sandra Dunham, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

By: 
Lois G. Lerner
Associate General Counsel

9104032709

666-6158
RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

88 JAN 28 AM 11:44

PINSKY, SMITH, FAYETTE, SOET & HULSWIT

ATTORNEYS AT LAW
THE MCKAY TOWER
GRAND RAPIDS, MICHIGAN 49503
(616) 451-8496

H. DAVID SOET
H. RHETT PINSKY
EDWARD M. SMITH
MICHAEL L. FAYETTE
DAVID E. HULSWIT, JR.
MARY A. DINKEL

A. ROBERT KLEINER
1916 - 1987

January 25, 1988

REGISTERED MAIL

Lois G. Lerner
Associate General Counsel
Federal Election Commission
Washington, D.C. 20463

Re: MUR 2560
Fifth Congressional District Democratic Committee
and Neil A. Dick, as treasurer

Dear Ms. Lerner:

Enclosed is the signed Affidavit of Neil A. Dick, accompanied by a letter from the Barry County Democratic Party in response to your letter of January 7, 1988.

Very truly yours,

PINSKY, SMITH, FAYETTE,
SOET & HULSWIT

H. David Soet

H. David Soet

HDS/mw
Enclosure

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
88 JAN 28 PM 12:34

01733040016

AFFIDAVIT

STATE OF MICHIGAN)
COUNTY OF KENT) §

Neil A. Dick being duly sworn states:

1. In the year 1986 I was Treasurer of the Fifth District Democratic Committee for the State of Michigan.

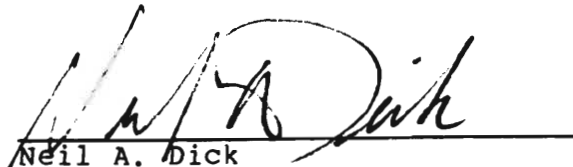
2. In 1986 we received a \$1,000.00 contribution from the Barry County Democratic Committee.

3. Barry County lies almost wholly within the Fifth Congressional District.

4. The Barry County Democratic Committee kept a bank account. All funds going into this account in 1986 arose from personal contributions or from the profits obtained by that Committee's operating a bingo game.

5. No funds going into the bank account in the year 1986 came from donations from any corporation or from any labor union.

6. The information I am herewith furnishing is based upon a statement obtained by me from Ralph Smith, the Treasurer of the Barry County Democratic Committee, a copy of whose letter to me is attached.


Neil A. Dick

On January 26th, 1988, there appeared before me Neil A. Dick known to be the person above named who signed the above statement and confirmed the same to be his free act and deed.


H. David Soet
Notary Public, Kent County, MI
My Commission expires: 2/20/90

91040332711

Barry County Democratic Party

January 16, 1988

Neil A. Dick
c/o Greiner, Inc.
82 Ionia Avenue N.W.
Grand Rapids, Michigan 49503-3044

Dear Mr. Dick:

You have requested information relative to the bank account set up by the Barry County Democratic Committee and the source of the \$1,000.00 contribution made to the Fifth District Democratic Committee in 1986. As Treasurer of the Barry County Democratic Committee I am familiar with this information.

The Barry County Committee used profits obtained by the Committee's running a bingo game. No funds going into the account came from a corporation or a labor union. The \$1,000.00 contribution paid to the Fifth District Democratic Committee in the year 1986 came from the Barry County Democratic Committee checking account.

Very Truly Yours,



Ralph Smith
Treasurer

RECEIVED	
DAVERMAN ASSOC.	
JAN 20 1988	
File	N
To	

2104033712



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

February 24, 1988

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Donald Riger, Treasurer
Fifth Congressional District
Democratic Committee
1709 Herrity Lane
Ionia, Michigan 48846

RE: MUR 2560
Fifth Congressional
District Democratic
Committee and
Donald Riger,
as treasurer

Dear Mr. Riger:

On December 8, 1987, the Federal Election Commission found reason to believe that the Fifth Congressional District Democratic Committee and Neil A. Dick, as treasurer (the "Committee") violated 2 U.S.C. § 441b and 11 C.F.R. § 102.6(a)(iv), provisions of the Federal Election Campaign Act of 1971, as amended (the "Act"). Neil A. Dick, the treasurer of record at that time, was sent the Factual and Legal Analysis which formed a basis for the Commission's finding. A copy is enclosed for your information in your capacity as the new treasurer of the Committee.

Mr. Dick responded to the Commission's findings by letters dated December 28, 1987 and January 25, 1988. His second response, which answered the question posed by the Commission, indicated that the \$1,000 contribution received from the Barry County Democratic Committee came from profits obtained by the Barry County Democratic Committee's operation of a bingo game. However, Mr. Dick did not address the Commission's finding of the violation of 11 C.F.R. § 102.6(a)(iv) nor did he ask for pre-probable cause conciliation. In addition, the Office of the General Counsel notes that the Committee also violated 2 U.S.C. § 433(c) by failing to notify the Commission of its change of treasurer within 10 days of the date of the change. If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. Please submit this request,

31040332713

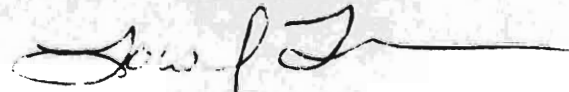
Letter to Donald Riger, Treasurer
Page 2

and any additional factual or legal materials you believe are relevant to the Commission's findings, within 15 days of your receipt of this letter.

If you have any questions, please contact Sandra Dunham, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel



By: Lois G. Lerner
Associate General Counsel

Enclosures

1. Copy of letter and Factual and Legal Analysis sent to Neil A. Dick
2. Procedures
3. Designation of Counsel Form

21040332714



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO:

LAWRENCE M. NOBLE
GENERAL COUNSEL

FROM:

MWE MARJORIE W. EMMONS/JOSHUA MCFADDEN *JM*

DATE:

MARCH 1, 1988

SUBJECT:

MUR 2560 - COMPREHENSIVE INVESTIGATIVE
REPORT #1
SIGNED FEBRUARY 26, 1988

The above-captioned matter was received in the Office of the Secretary of the Commission Friday, February 26, 1988 at 5:20 P.M. and circulated to the Commission on a 24-hour no-objection basis Monday, February 29, 1988 at 11:00 A.M.

There were no objections received in the Office of the Secretary of the Commission to the Comprehensive Investigative Report #1 at the time of the deadline.

2104032715

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
FEDERAL ELECTION COMMISSION

SENSITIVE

88 FEB 26 PM 5:20

In the Matter of)
)
Fifth Congressional District) MUR 2560
Democratic Committee and)
Donald Riger, as treasurer)

COMPREHENSIVE INVESTIGATIVE REPORT #1

On December 8, 1987, the Commission found reason to believe that the Fifth Congressional District Democratic Committee and Neil A. Dick, as treasurer (the "Committee") violated 2 U.S.C. § 441b and 11 C.F.R. § 102.6(a)(iv) by accepting a \$7,000 contribution from the Michigan Democratic State Central Committee and a \$1,000 from the Barry County Democratic Committee, both unregistered committees. Neil A. Dick responded to the Commission's findings on December 28, 1987, and stated that he had resigned as treasurer of the Committee on July 20, 1987. Moreover, he requested and was granted an extension of time to respond to the question presented by the Commission. In his letter dated January 25, 1988, he answered the question concerning the \$1,000 contribution from the Barry County Democratic Committee but did not offer any information concerning the \$7,000 contribution from the Michigan Democratic State Central Committee. Mr. Dick did not mention nor request pre-probable cause conciliation in either letter.

The Committee's 1987 Year End Report was sent to the Commission on February 2, 1988. Included with the report was a cover letter indicating Donald Riger was the new treasurer. This Office tried unsuccessfully to contact Mr. Riger by telephone in order to determine what information he had obtained concerning

91040332716

the Commission's findings. Therefore, this Office sent a letter to Mr. Riger setting forth all of the responses received to date concerning this matter and enclosed a copy of the Factual and Legal Analysis for his information. He was requested to respond to this letter within 15 days of his receipt of that letter. Upon either the receipt of his response or expiration of the 15 day period this Office will submit another report.

General Counsel
Lawrence M. Noble

Date

2/26/88

BY:


Lois G. Lerner
Associate General Counsel

Staff Person: Sandra Dunham

21040332717

88 MAR 21 PM 1:26

March 17, 1988

Lawrence M. Noble
General Counsel
Federal Election Commission
Washington, D.C. 20463

Re: MUR 2560 Fifth Congressional District Democratic
Committee and Donald Riger, as treasurer

Dear Mr. Noble:

On March 16, 1988 I received a letter from you concerning MUR 2560. In as much as I am a new Treasurer I would like to request an extension of time of 20 days beyond when my response would normally be due. It will be necessary for me to research some of the questions you pose. In addition I would request pre-probable cause conciliation on all matters referred to in your letter dated February 24, 1988.

On one point however I would comment. I wrote the Federal Election Commission on February 2, 1988 informing you that I had become the Treasurer. This was within 10 days of assuming the financial responsibilities of the Committee. When I give you a more detailed response I will comment further on this aspect.

Sincerely yours,

Donald Riger

Donald Riger
Treasurer
Fifth District Democratic Committee

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
88 MAR 21 PM 3:16

81040332718



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 22, 1988

Donald Riger, Treasurer
Fifth Congressional District
Democratic Committee
1709 Herrity Lane
Ionia, MI 48846

RE: MUR 2560
Fifth Congressional
District Democratic
Committee and Donald
Riger, as treasurer

Dear Mr. Riger:

This is in response to your letter dated March 17, 1988, which we received on March 21, requesting an extension of 20 days to respond to the Commission's reason to believe letter. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by close of business of April 5, 1988.

If you have any questions, please contact Sandra Dunham, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

21040832719

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
FEDERAL ELECTION COMMISSION
SECRET

88 JUN 20 AM 11:14

In the Matter of)

Fifth Congressional District)
Democratic Committee and)
Donald Riger, as treasurer)

MUR 2560

SENSITIVE

EXECUTIVE SESSION
JUN 28 1988

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On December 8, 1987, the Commission found reason to believe that the Fifth Congressional District Democratic Committee and Neil A. Dick, as treasurer, (the "Committee") violated 2 U.S.C. § 441b and 11 C.F.R. § 102.6(a)(iv) by accepting a \$7,000 transfer from the Michigan Democratic State Central Committee (the "State Central Committee") and a \$1,000 transfer from the Barry County Democratic Committee. Neil A. Dick responded to the Commission's findings on December 28, 1987, and stated that he had resigned as treasurer on July 20, 1987 (Attachment 1). Moreover, he requested and was granted an extension of time to respond to the question presented by the Commission. In his letter dated January 25, 1988, he answered the question concerning the \$1,000 transfer from the Barry County Democratic Committee but did not offer any information concerning the \$7,000 transfer from the State Central Committee (Attachment 2). Mr. Dick did not mention nor request pre-probable cause conciliation in either letter.

The Committee's 1987 Year End Report was sent to the Commission on February 2, 1988.^{1/} Included with the report was a

^{1/} This report was the only report that the Committee had to file in the period from the date of Mr. Dick's resignation to the appointment of Mr. Riger.

2104032720

cover letter indicating Donald Riger was the new treasurer (Attachment 3). Consequently, this Office sent a letter to Mr. Riger setting forth all of the responses received to date concerning this matter and enclosed a copy of the Factual and Legal Analysis for his information. On March 17, 1988, Mr. Riger responded to the letter and requested pre-probable cause conciliation, in addition to a request for a 20 day extension of time (Attachment 4). In his last response, dated March 30, 1988, Mr. Riger responded to the violations (Attachment 5).

II. ANALYSIS

Michigan Election law allows each political committee to maintain only one account. Consequently, the Committee operates as the federal committee established and maintained to finance its political activity in connection with federal elections. The Committee operates in conjunction with an administrative committee under the name of Fifth District Democratic Administrative Fund (the "Administrative Fund") which finances non-federal political activity. The Michigan Democratic Party also has two committees; the Democratic Campaign Committee (the "Campaign Committee") to finance federal activities and the second, the Central Committee, to administer its non-federal activity. Both the Committee and the Democratic Campaign Committee are registered organizations with the Federal Election Commission.

11 C.F.R. § 102.6(a)(ii) states transfers of funds may be made without limitation on amount between or among State party

91040032721

committees and subordinate party committees whether or not such committees are affiliated. However, pursuant to 11 C.F.R. § 102.6(a)(iv), transfers between State party committees and subordinate party committees can only be made from funds which are permissible under the Act. The Committee, the Barry County Democratic Committee, the Administrative Fund and the State Central Committee are affiliated and are thus permitted to transfer unlimited amounts between and among each other. However, the Barry County Democratic Committee and the State Central Committee are permitted to accept contributions from labor unions because Michigan Election law permits such contributions. It was because of this that the Commission found reason to believe that the Committee violated 2 U.S.C. § 441b and 11 C.F.R. § 102.6(a)(iv).

In his letter of January 25, 1988, the former treasurer, Mr. Dick, provided an affidavit stating the \$1,000 transfer from the Barry County Democratic Committee was made up of funds received from individuals and profits obtained from operating a bingo game only; there were no labor funds. A copy of a letter from the Barry County Democratic Committee attesting to that fact accompanied Mr. Dick's affidavit (Attachment 2, page 2).

Mr. Riger's letter dated March 30, 1988 indicated the \$7,000 transfer from the State Central Committee to the Committee was a mistake (Attachment 5, page 1). This supports a previous statement made by the Michigan Democratic party to the RAD

21040332722

analyst. However, it is unclear whether this check was deposited in error. As noted above, because Michigan Election law allows a political committee to maintain only one account, the Committee was set up pursuant to federal election rules and regulations. The Committee had a different name, and its mailing address and treasurer were distinct from the Administrative Fund, which was the committee that could have accepted the \$7,000 from the State Central Committee. Therefore, this Office has requested a copy of the check from both the State Central Committee and the Committee in order to establish the intended recipient. This Office proposes that the Commission decline to enter into conciliation at this time and approve the attached questions concerning the \$7,000 transfer.

This Office did not previously recommend that the Commission find reason to believe that the Barry County Democratic Committee or the State Central Committee violated 2 U.S.C. § 441b and 11 C.F.R. § 102.6(a)(iv) by transferring funds to the Committee. In its response the Committee indicated that the \$1,000 transfer did not contain labor funds. However, the Committee did not make a similar statement concerning the \$7,000 transfer from the State Central Committee. Therefore, this Office recommends that the Commission find that the Michigan Democratic State Central Committee violated 2 U.S.C. § 441b and 11 C.F.R. § 102.6(a)(iv) by transferring \$7,000 which may have contained labor funds.

Under 2 U.S.C. § 432(a), every political committee shall have a treasurer. No contribution expenditure shall be accepted or made by or on behalf of a political committee during any

21040032723

period in which the office of treasurer is vacant. No expenditure shall be made for or on behalf of a political committee without the authorization of the treasurer or his or her designated agent. Even though the 1987 Year End Report filed by the Committee indicates that there were neither contributions received nor expenditures made during the period of time that the Committee did not have a treasurer, the Committee violated 2 U.S.C. § 432(a) by not having a treasurer for over six months. Therefore, this Office recommends that the Commission find reason to believe that the Committee violated 2 U.S.C. § 432(a).

Under 2 U.S.C. § 433(c), all political committees are required to report to the Commission any change in information previously submitted in a Statement of Organization no later than 10 days after the change in date. Mr. Dick resigned his position as treasurer on July 15, 1987.^{2/} Mr. Riger informed the Commission that he was the new treasurer in a cover letter to the 1987 Year End Report which was dated February 2, 1988. Because the Committee did not amend its Statement of Organization within 10 days of Mr. Dick's resignation, this Office recommends that the Commission find reason to believe that the Committee violated 2 U.S.C. § 433(c).

^{2/} The 1987 Mid-Year Report for the Committee was filed by Mr. Dick and signed by him as treasurer. It contained information concerning the \$7,000 transfer from the State Central Committee which was transferred to the Administrative Fund in July, 1987.

91040032724

III. RECOMMENDATIONS

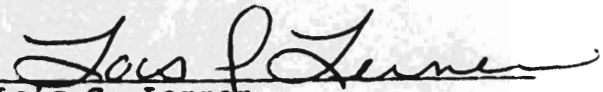
1. Decline at this time to enter into conciliation prior to a finding of probable cause to believe with Fifth Congressional District Democratic Committee and Donald Riger, as treasurer.
2. Find reason to believe that the Fifth Congressional District Democratic Committee and Donald Riger, as treasurer, additionally violated 2 U.S.C. §§ 432(a) and 433(c).
3. Find reason to believe that the Michigan Democratic State Central Committee and Thomas Toach, as treasurer, violated 2 U.S.C. § 102.6(a)(iv).
4. Approve the attached letters, questions and Factual and Legal Analysis.

Lawrence M. Noble
General Counsel

Date

6/17/88

BY:


Lois G. Lerner
Associate General Counsel

Attachments

1. Response from Neil Dick - 12/28/87
2. Response from Neil Dick - 1/25/88
3. Letter to Commission from Donald Riger - 2/2/88
4. Request for conciliation from Donald Riger - 3/17/88
5. Response from Donald Riger - 3/30/88
6. Proposed letter and questions to Donald Riger
7. Proposed letter and Factual and Legal Analysis to Thomas Roach.

Staff Person: Sandra Dunham

9104032725

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Fifth Congressional District) MUR 2560
Democratic Committee and)
Donald Riger, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of June 28, 1988, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 2560:

1. Decline at this time to enter into conciliation prior to a finding of probable cause to believe with Fifth Congressional District Democratic Committee and Donald Riger, as treasurer.
2. Find reason to believe that the Fifth Congressional District Democratic Committee and Donald Riger, as treasurer, additionally violated 2 U.S.C. §§ 432(a) and 433(c).
3. Find reason to believe that the Michigan Democratic State Central Committee and Thomas Toach, as treasurer, violated 2 U.S.C. § 441b and 11 C.F.R. § 102.6(a)(1)(iv).

(continued)

21040332726

Federal Election Commission
Certification for MUR 2560
June 28, 1988

Page 2

4. Approve the letters, questions, and Factual and Legal Analysis attached to the General Counsel's report dated June 17, 1988, and Errata dated June 22, 1988, subject to amendment as noted during the meeting discussion of this date.

Commissioners Aikens, Elliott, Josefiak, McDonald, McGarry, and Thomas voted affirmatively for the decision.

Attest:

6/28/88
Date

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

21040332727



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 7, 1988

Thomas Roach, Treasurer
Michigan Democratic State
Central Committee
606 Townsend Street
Lansing, MI 48933

RE: MUR 2560
Michigan Democratic State
Central Committee and
Thomas Roach, as treasurer

Dear Mr. Roach:

On June 28, 1988, the Federal Election Commission found that there is reason to believe the Michigan Democratic State Central Committee ("Committee") and you, as treasurer, violated 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") and 11 C.F.R. § 102.6(a)(1)(iv) of the Commission's Regulations. The 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 the Committee and you, as treasurer. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office, along with a copy of the \$7,000 transfer check to the Fifth Congressional District Democratic Committee, dated on or about October, 1986, within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information demonstrating that no further action should be taken against the Committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or

21040332728

Letter to Thomas Roach, Treasurer
Page 2

recommending declining that pre-probable cause conciliation be pursued. The Office of the General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, the Commission will not entertain requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent.

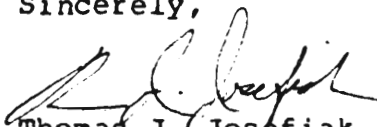
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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 authorizing such counsel to receive any notifications and other communications from the Commission.

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 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 Sandra Dunham, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,


Thomas J. Josefiak
Chairman

Enclosures

Factual and Legal Analysis
Procedures
Designation of Counsel Form

91040332729

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: **Michigan Democratic State Central Committee and Thomas Roach, as treasurer** MUR: 2560

The 1986 30 Day Post-General Report filed by the Fifth Congressional District Democratic Committee (the "Fifth Congressional Committee") disclosed \$7,000 received from the Michigan Democratic State Central Committee (the "State Central Committee"), an unregistered Democratic party organization. The transfer was received November 3, 1986.

A Request for Additional Information ("RFAI") was sent to the Fifth Congressional Committee on March 25, 1987. The RFAI asked the Fifth Congressional Committee to clarify whether the transfer was permissible as required by 11 C.F.R. § 102.5(a). The Fifth Congressional Committee was further advised to either refund any impermissible funds to the donors or transfer the funds, with the donor's consent, to an account not used to influence federal elections.

On April 16, 1987, RAD sent a Second Notice to the Fifth Congressional Committee which stated that the Commission had not received a response to the RFAI of March 25, 1987.

On April 21, 1987, the Fifth Congressional Committee responded to the RFAI. The response stated that the Fifth Congressional Committee transferred \$2,000 of the \$7,000 to the Fifth District Democratic Administrative Fund (the "Administrative Fund"), a separate administrative group with a

non federal account. The Fifth Congressional Committee reported it was attempting to raise sufficient funds to enable it to transfer the balance at a later date. The remaining \$5,000 was transferred to the Fifth District Democratic Administrative Fund on June 20, 1987.

On April 22, 1987, the Michigan Democratic Party sent a letter to RAD explaining that that \$7,000 transfer from the State Central Committee was presumably deposited into the Fifth Congressional Committee's federal account in error. A letter from the Michigan Democratic Party was sent to the Fifth Congressional Committee on the same day requesting it transfer the \$7,000 to the Administrative Fund.

The Fifth Congressional Committee operates as the federal committee established and maintained by the Fifth Congressional District of the Democratic Party to finance its political activity in connection with federal elections. This is because Michigan Election law allows each political committee to maintain only one account. The Fifth Congressional Committee is set up in conjunction with the Administrative Fund which finances its non federal political activity. The Michigan Democratic Party also has two committees; the Democratic Campaign Committee (the "Campaign Committee") to finance federal activities and the second, the State Central Committee, to administer its non federal account.

11 C.F.R. § 102.6(a)(1)(ii) states transfers of funds may be made without limit on an amount between or among state party

21040833731

committees and subordinate party committees whether or not such committees are affiliated. The Fifth Congressional Committee, Administrative Fund, Campaign Committee and State Central Committee are all committees of the Democratic Party in the State of Michigan. Therefore, all of these organizations are permitted to transfer unlimited amounts between each other.

The Administrative Fund and the State Central Committee are set up as non federal committees and pursuant to 11 C.F.R. § 102.6(a)(1)(iv) transfers between State party committees and subordinate party committees can only be made from funds which are permissible under the Act. Pursuant to 2 U.S.C. § 441b, it is unlawful for any labor organization to make a contribution or expenditure in connection with federal election activity. Due to the fact Michigan Election law permits labor unions to contribute to political committees, the State Central Committee may have had labor funds in its account in October, 1986. Consequently, the \$7,000 transfer from the State Central Committee to the Fifth Congressional Committee may have contained labor funds.

Therefore, there is reason to believe that the Michigan Democratic State Central Committee and Thomas Roach, as treasurer, violated 2 U.S.C. § 441b and 11 C.F.R. § 102.6(a)(1)(iv).

91040332732



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 7, 1988

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Donald Riger, Treasurer
Fifth Congressional District
Democratic Committee
1709 Herrity Lane
Ionia, Michigan 48846

RE: MUR 2560
Fifth Congressional District
Democratic Committee and
Donald Riger, as treasurer

Dear Mr. Riger:

On February 24, 1988, you were notified that the Federal Election Commission had found reason to believe on December 8, 1987 that the Fifth Congressional District Democratic Committee and Neil A. Dick, as treasurer, violated 2 U.S.C. § 441b and 11 C.F.R. § 102.6(a)(1)(iv). You were notified of this reason to believe finding when you informed this Commission that you were the new treasurer. On March 17, 1988, you submitted a request to enter into conciliation negotiations prior to a finding of probable cause to believe. On June 28, 1988, the Commission further determined that there is reason to believe that the Fifth Congressional District Democratic Committee and Donald Riger, as treasurer, violated 2 U.S.C. §§ 432(a) and 433(c):

The Commission has reviewed your request and determined to decline at this time to enter into conciliation prior to a finding of probable cause to believe because additional information is necessary. Please submit answers to the enclosed questions. Such information, and any information concerning the additional violations, should be submitted to the Office of the General Counsel within 15 days of receipt of this letter.

At such time when the investigation in this matter has been completed, the Commission will reconsider your request to enter into conciliation prior to a finding of probable cause to believe.

3
3
7
2
3
3
0
4
0
1
2

Letter to Donald Riger
Page 2

If you have any questions please contact Sandra Dunham, the
staff member assigned to this matter at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel



BY: Lois G. Lerner
Associate General Counsel

Enclosure
Questions

91040332734

QUESTIONS

TO: **Donald Riger, Treasurer
Fifth Congressional District
Democratic Committee**

Please submit answers in writing and under oath to the questions set forth below within 15 days of your receipt of this request.

1. The Fifth Congressional District Democratic Committee's 1986 30 Day Post-General Election Report disclosed a \$7,000 transfer from the Michigan Democratic State Central Committee. Please provide a copy of the \$7,000 check.
2. Please list the source of all of the funds that made up the transfer. Specifically, state whether labor funds were included.
3. Produce all documents which show the make up of the funds which made up the transfer.

91040332735

QUESTIONS

TO: Donald Riger, Treasurer
Fifth Congressional District
Democratic Committee

Please submit answers in writing and under oath to the questions set forth below within 15 days of your receipt of this request.

1. The Fifth Congressional District Democratic Committee's 1986 30 Day Post-General Election Report disclosed a \$7,000 transfer from the Michigan Democratic State Central Committee. Please provide a copy of the \$7,000 check.
2. Please list the source of all of the funds that made up the transfer. Specifically, state whether labor funds were included.
3. Produce all documents which show the make up of the funds which made up the transfer.

21040332736

6CCT#4790

RECEIVED
FEDERAL ELECTION COMMISSION

88 JUL 15 AM 11:52

LAW OFFICES
SIMON, DEITCH, FRIEDMAN, SIEFMAN AND GREEN
A PROFESSIONAL CORPORATION

26911 NORTHWESTERN HIGHWAY, SUITE 400
POST OFFICE BOX 5073
SOUTHFIELD, MICHIGAN 48086

(313) 262-1600

TELECOPIER (313) 355-5830

DAVID F. SIMON
LAURENCE B. DEITCH
RANDOLPH J. FRIEDMAN
JAY N. SIEFMAN
FRED B. GREEN
BRIAN P. HENRY
STEVEN G. SILVERMAN
JOHN A. HUBBARD
SHEREEN L. SILVER
DAVID H. FREEDMAN

LANSING OFFICE
200 NORTH CAPITOL
SUITE 500
LANSING, MICHIGAN 48933
(517) 482-3136

July 13, 1988

Sandra Dunham, Esq.
Office of the General Counsel
Federal Elections Commission
999 East Street, N.W.
Washington, D.C. 20463

Re: MUR 2560
Michigan Democratic State Central Committee
and Thomas Roach, as Treasurer

Dear Ms. Dunham:

I am writing pursuant to our telephone conversation of July 12, 1988. As I indicated to you, I am currently the Treasurer of the Michigan Democratic State Central Committee. Additionally, pursuant to the enclosed "Statement of Designation of Counsel," I will be serving as counsel to the Democratic State Central Committee in connection with the above-referenced matter.

As we discussed, I hereby request Pre-Probable Cause Conciliation pursuant to 11 C.F.R. §111.18(d).

Additionally, I hereby request a twenty (20) day extension of time in which to make submissions for the Pre-Probable Cause Conciliation proceeding. This request is necessitated by the impending commencement of the Democratic National Convention on July 18, 1988. Both Richard N. Wiener, Chairperson of the Democratic State Central Committee and the undersigned will be participating. Accordingly, we do not feel that we will have adequate time to prepare a response.

Per our discussion, it is my understanding that you are favorably disposed to granting the requested extension until August 15, 1988. I ask that you confirm that extension in writing.

88 JUL 15 PM 3:48

RECEIVED
FEDERAL ELECTION COMMISSION

7
3
7
3
3
4
0
1

SIMON, DEITCH, FRIEDMAN, SIEFMAN AND GREEN

Sandra Dunham, Esq.
July 13, 1988
Page Two

I look forward to working with you toward resolving this matter.

Sincerely,

SIMON, DEITCH, FRIEDMAN, SIEFMAN AND GREEN
a Professional Corporation


Laurence B. Deitch

LBD/jlm

cc: Richard N. Wiener

21-40332738

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2560

NAME OF COUNSEL: LAURENCE B. Deitch

ADDRESS: 26911 NORTHWESTERN Hwy, STE 400
SOUTH FIELD, MI 48034

TELEPHONE: (313) 262-1600

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.

7/11/88
Date

Richard N. Wiener, CHAIR
Signature

RESPONDENT'S NAME: MICHIGAN DEMOCRATIC STATE CENTRAL COMMITTEE
RICHARD N. WIENER, CHAIR

ADDRESS: 606 TOWNSEND
LANSING MI 48933

HOME PHONE: (517) 655-4176

BUSINESS PHONE: (517) 371-5410

21040332739

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

88 JUL 18 PM 1:21

July 15, 1988

Mr. Lawrence M. Noble
General Council
Federal Election Commission
Washington, D. C. 20463

RE: MUR 2560
5th Congressional District Democratic Committee
and
Donald Riger, as Treasurer

Dear Mr. Noble:

I would like to request an extension of my response to your inquiries in your letter of July 7, 1988. I would request that the extension be 20 days beyond July 29, 1988. I will be out of Michigan for the next two weeks and when I return it will be necessary for me to contact the Michigan Democratic Party in Lansing in order to properly respond to your questions.

If you have any questions do not hesitate to contact me.

Very truly yours,

Donald Riger

Donald Riger
Treasurer
1709 Herrity Lane
Ionia, Michigan 48846

DR/bas

opeiu/local 2
afl cio

9104032740

88 JUL 18 PM 4:26

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 19, 1988

Laurence B. Deitch, Esquire
26911 Northwestern Highway
Suite 400, P.O. Box 5073
Southfield, MI 48086

RE: MUR 2560
Michigan Democratic State
Central Committee, and
Laurence B. Deitch, as
treasurer

Dear Mr. Deitch:

This is in response to your letter dated July 13, 1988, which we received on July 15, 1988, requesting an extension of 20 days to respond to the Commission's reason to believe letter. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by the close of business on August 15, 1988.

If you have any questions, please contact Sandra Dunham, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

Lois G. Lerner

BY: Lois G. Lerner
Associate General Counsel

91040332741



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 20, 1988

Donald Riger, Treasurer
Fifth Congressional District
Democratic Committee
1709 Herrity Lane
Ionia, MI 4846

RE: MUR 2560
Fifth Congressional
District Democratic
Committee and Donald
Riger, as treasurer

Dear Mr. Riger:

This is in response to your letter dated July 15, 1988, which we received on July 18, 1988, requesting an extension of 20 days to respond to the Commission's questions. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by the close of business on August 18, 1988.

If you have any questions, please contact Sandra Dunham, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

A handwritten signature in cursive script, appearing to read "Lois G. Lerner", is written over the typed name and title.

91040332742

600#126
HAND DELIVERED

RECEIVED
FEDERAL ELECTION COMMISSION

88 AUG 15 PM 12:04

LAW OFFICES
SIMON, DEITCH, FRIEDMAN, SIEFMAN AND GREEN
A PROFESSIONAL CORPORATION

26911 NORTHWESTERN HIGHWAY, SUITE 400
POST OFFICE BOX 5073
SOUTHFIELD, MICHIGAN 48086

(313) 262-1600

TELECOPIER (313) 355-5830

DAVID F. SIMON
LAURENCE B. DEITCH
RANDOLPH J. FRIEDMAN
JAY N. SIEFMAN
FRED B. GREEN
BRIAN P. HENRY
STEVEN G. SILVERMAN
JOHN A. HUBBARD
SHEREEN L. SILVER
DAVID H. FREEDMAN

LANSING OFFICE
200 NORTH CAPITOL
SUITE 500
LANSING, MICHIGAN 48933
(517) 482-3136

August 12, 1988

Sandra Dunham, Esq.
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

VIA FEDERAL EXPRESS

88 AUG 15 PM 3:10

RECEIVED
FEDERAL ELECTION COMMISSION

Re: MUR 2560
Michigan Democratic State Central Committee
and Thomas Roach, as Treasurer

Dear Ms. Dunham:

By letter dated July 7, 1988 to Thomas Roach, former Treasurer of the Michigan Democratic State Central Committee (the "Committee"), the Federal Election Commission (the "Commission") indicated that it had found that "there was reason to believe" that the Committee and Mr. Roach, as its former Treasurer, had violated 2 U.S.C. §441b, a provision of the Federal Election Campaign Act of 1971, as amended (the "Act"), and 11 C.F.R., §102.6(a)(1)(iv) of the Commission's regulations.

By letter dated July 19, 1988, the Committee was given until August 15, 1988 to respond to the Commission's reason to believe letter, as part of a pre-probable cause conciliation process.

Accordingly, I write to you, on behalf of the Committee, both as counsel to the Committee and as its current Treasurer.

The Commission's letter of July 7, 1988 asked for a copy of the Seven Thousand (\$7,000.00) Dollar check to the Fifth Congressional District Democratic Committee. A copy of that check is enclosed. While it is irrefutable that the check was deposited in a federal account, our initial investigation leads us to conclude that there was no violation of either the Act or the Commission's regulations. We make that assertion because

Sandra Dunham, Esq.
Office of the General Counsel
Federal Election Commission
August 12, 1988
Page 2

while it is true that the Committee's account on October 29, 1986 contained labor organization funds, as you will see, the account also contained a very large amount of individual contributions.

To support that contention, we enclose the following:

1. A copy of an account summary of the Committee's National Bank of Detroit Checking Account (Account No. 0086102-34). As you will see, the account summary contains the balance in the account on every day of the month of October, 1986. The balance in the account on October 29, 1986 was \$391,875.74.

2. The daily deposit ledgers for the Committee from October 1 to October 29, 1986. Included among the sources of funds noted on the ledger are the following:

(a) Batch Deposits. These are checks of less than \$20.00 from individuals. They are not required to be itemized under Michigan's Campaign Finance Act;

(b) Transfers from county and district parties, where the amount is less than \$1,000 and the local party can document sufficient individual contributions;

(c) Transfers from ASDC/Dollars for Democrats. This is a federal account registered with the FEC and, as a party account, all funds are eligible;

(d) Transfers from Democratic Campaign Committee. At the time of the 1986 election, the Democratic Campaign Committee was the name of the Michigan Democratic Party's federal account;

(e) Campaign '86, which was established by the Committee in 1986 as what, pursuant to Michigan law, is known as a transfer account. Deposits may be made into the account, but expenditures cannot (other than the direct transfer of funds to the Committee's account);

3. A deposit ledger for the Campaign '86 account from October 3, 1986 to October 29, 1986. Our review indicates that approximately two-thirds of the contributions were

21040032745
•SIMON, DEITCH, FRIEDMAN, SIEFMAN AND GREEN

Sandra Dunham, Esq.
Office of the General Counsel
Federal Election Commission
August 12, 1988
Page 3

individual funds which could have been permissibly expended under federal law had they been deposited in a federal account. For example, on just October 27 and October 29 alone, your review of the ledger will indicate that \$91,555 in individual contributions were made on those dates.

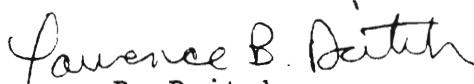
We are optimistic that, upon review of the enclosed information, the Commission will conclude that no violation occurred.

Should you be in need of further information, we are, of course, available to provide it to you. Please note, specifically, that we have copies of all the individual contribution checks in our possession. I did not send them to you herein as it seemed that it would be both onerous and unnecessary.

Finally, please note that when we last spoke, I indicated that I might be responding for the Fifth Congressional District Campaign Committee. After discussion with its current Treasurer, Mr. Riger, that is not the case. We look forward to hearing from you.

Sincerely,

SIMON, DEITCH, FRIEDMAN, SIEFMAN AND GREEN
a Professional Corporation


Laurence B. Deitch

LBD/jlm

cc: Mr. Richard N. Wiener

MICHIGAN DEMOCRATIC

STATE CENTRAL COMMITTEE

THOMAS A. ROACH-TREASURER

608 TOWNSEND STREET

LANSING, MI 48933

Seven thousand

PAY

TO

ORDER

OF

5th District Democratic Party

180 Monroe Suite #4000

Grand Rapids, Mich.

307-314853

CHECK NO.

DATE

no/100

AMOUNT

9-32
720

LAFAYETTE - ORLEANS OFFICE - 72
NB NATIONAL BANK
OF DETROIT
DETROIT, MICHIGAN

28144

Richard Monroe

⑈028144⑈ ⑆072000325⑆

85102⑈34⑈

⑈0000700000⑈

7 4 7

4 0 3 3

Pay to the Order of
UNION BANK & TRUST CO., (N.A.)
Grand Rapids, Michigan
FOR DEPOSIT ONLY

FIFTH CONGRESSIONAL
DISTRICT DEMOCRATIC
COMMITTEE
923-130-4

Pay to the Order of
UNION BANK & TRUST CO. (N.A.)
Grand Rapids, Michigan
FOR DEPOSIT ONLY

FIFTH CONGRESSIONAL
DISTRICT DEMOCRATIC
COMMITTEE
923-130-4

02 DETROIT, MICHIGAN 92
PAY TO THE ORDER OF
UNION BANK & TRUST CO.
GRAND RAPIDS, MICHIGAN
NOV 86 04 92
9-52

0009 3 3 3 6

74-17 2 74-17
PAY TO THE ORDER OF
UNION BANK & TRUST CO.

UNION BANK & TRUST CO.
GRAND RAPIDS, MICHIGAN
74-17

03 NOV 86



Transaction Receipt

This is your receipt for the transaction described below.

First Line Shows: Bank—Branch—Teller, Process Date (Effective Date), Transaction Code

032-006-05 10/14/86 () N-00
 DDM 86102-34 366.00 DE 1320
 Second Line Shows: Account Type, Account Number, Amount, Transaction Type, Sequence No.
 AND 1771-10 Rev. 868 (Code Definitions on Reverse Side)



NATIONAL BANK
 OF DETROIT
 MICHIGAN DEMOCRATIC
 STATE CENTRAL COMMITTEE

0720003256

0720003256

Change

10 00

130710

8



Transaction Receipt

This is your receipt for the transaction described below.

First Line Shows: Bank—Branch—Teller, Process Date (Effective Date), Transaction Code

032-006-05 10/14/86 () N-00
 DDM 86102-34 10.00 DE 1320
 Second Line Shows: Account Type, Account Number, Amount, Transaction Type, Sequence No.
 AND 1771-10 Rev. 868 (Code Definitions on Reverse Side)



NATIONAL BANK
 OF DETROIT
 MICHIGAN DEMOCRATIC
 STATE CENTRAL COMMITTEE

0720003256

0720003256

3.00
 75.00
 225.00
 30.00
 30.00
 30.00

366.00

130503256

8

3005082

CASH PROOF: ON HAND + ALL CHECKS + AND CASH REC'D - BANK DEPOSIT = END OF DAY

[illegible][illegible]



Transaction Receipt

This is your receipt for the transaction described below.

First Line Shows: Bank—Branch—Teller, Process Date (Effective Date), Transaction Code

032-006-05 10/03/86 () TC-00
00A 36102-14 64,697.63 DE 1270

Second Line Shows: Account Type, Account Number, Amount, Transaction Type, Sequence No.

NBD 1771-10 Rev 985 (Code Definitions on Reverse Side)



MICHIGAN DEMOCRATIC
STATE CENTRAL COMMITTEE

072000032512
B510234115
PER TYPE 68 00
BUREAU 100 00
ROBINSON 100 00
ROBERTS 150 00
HISLAND CITY 20 00
MILCO ST 600
GENESEE CITY 70 00
BMEY 100 00
MSSD 200 00
BPCA PAC 200 00
SSDA PAC 200 00
MRA PAC 400 00
KAROL PAC 200 00
ALL VAW PAC 35000 00
DEM VIC FUN 286368
DOLLARS/DEMS 5000 00
CSC 20000 00

64697 68

30070000

86

21040332750

CASH RECEIPTS JOURNAL

CASH PROOF: ON HAND START OF DAY + ALL CHECKS AND CASH REC'D - BANK DEPOSIT ON HAND = END OF DAY

DATE 3 OCT 1962 "H"

[illegible]

DATE	10/3/82
PAGE NO	

19. 2019 and 2020

OFF OF DETROIT
DETROIT, MICHIGAN

MICHIGAN DEMOCRATIC
STATE CENTRAL COMMITTEE

0720003251

88102034

85.00
DICKINSON
M3500

10.00
44.00
100.00
420.68

B

672 68

6000388

82



Transaction Receipt

This is your receipt for the transaction described below.

First Line Shows: Bank—Branch—Teller, Process Date (Effective Date), Transaction Code

032-006-03 10/06/86 1 10-00
2 5 4 2 2004 086192-34 1 6 672.68 DE 0980

Second Line Shows: Account Type, Account Number, Amount, Transaction Type, Sequence No

21040332754



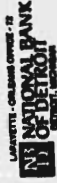
Transaction Receipt

This is your receipt for the transaction described below.

First Line Shows: Bank—Branch—Teller Process Date (Effective Date) Transaction Code

032-004-02 10/07/86 () TC-00
00H 86102-34 96,470.00 BE 1380

Second Line Shows: Account Type, Account Number, Amount, Transaction Type, Sequence No.
NBD 1771.50 Rev. 8/84 (Code Definitions on Reverse Side.)



MICHIGAN DEMOCRATIC
STATE CENTRAL COMMITTEE

0072000326

PER TAPE
6/21/86
44170 N
60142 N
15300
10000 00

90470.00
70570822

OR ACCOUNT OF

9 1 0 4 0 3 3 2 7 5 5

CASH RECEIPTS JOURNAL

CHECKS	CASH	NET PAYMENT	DATE	NAME	BALANCE	DESCRIPTION		CONTRIBUTIONS	500 CLUB	CENTURY FUND	MEMBER- SHIPS	JEFF - JACK TICKETS	JEFF - JACK ADS	PRESIDENT'S CLUB	SPECIAL EVENTS	BINGO	REC- ELLAMC
67.00		67.00	10/1/86	BATCH MEMBERSHIP	67.00	86 MARS	F					67.00					
15.00		15.00	10/1/86	INGHAM, DEIL PARTI	82.00	86 MARS	1					63.00					
				86 CF FOR ROGER A. RAPHAEL		86 CF	2			90.00							
100.00		100.00	10/1/86	KENNETH N. HILTON	100.00	86 CF	3			100.00							
125.00		125.00	10/1/86	LEON S. COHAN	125.00	86 500CL PAY	4		125.00								
25.00		25.00	10/1/86	LADON E. CUNNINGHAM	25.00	JEFF - FINAL	5					25.00					
90000.00		90000.00	10/1/86	CAMPAIGN '86 - MDP	1008100.00	TRANS	6										90000
							7										
							8										
							9										
							10										
							11										
							12										
							13										
							14										
							15										
							16										
							17										
							18										
							19										
							20										
							21										
							22										
							23										
							24										
							25										
							26										
							27										
							28										
							29										
							30										
							T		125.00	190.00	130.00	25.00					9000

CHECKS ONLY
90470.00

SUBTRACT ENCIRCLED
ITEMS

TOTALS
SHEET ONLY 90470.00

NO TOTAL
SHEETS 90470.00

CASH PROOF: ON HAND START OF DAY + ALL CHECKS AND CASH REC'D - BANK DEPOSIT ON HAND END OF DAY

PAGE NO.
DATE 10/9/86

OCTOBER 19 86

21040332756



Transaction Receipt

This is your receipt for the transaction described below.

First Line Shows: Bank—Branch—Teller, Process Date (Effective Date) Transaction Code

032-006-02 10/07/86 1 PC-00
00N 86102-34 90-470.00 DE 1380

Second Line Shows: Account Type, Account Number, Amount, Transaction Type, Sequence

NBD 1771 to Rev. 9/85 (Code Definitions on Reverse Side)



MICHIGAN DEMOCRATIC
STATE CENTRAL COMMITTEE

072000326

PER TAPE
BEGINNING
44,175.00
BALANCE
1,000.00
C.B.

267.00
255.00
100.00
1525.00
153.00
10000.00

90470.00

7057088

8

OR ACCOUNT OF

9 1 5 4 0 3 3 2 7 5 7

CASH RECEIPTS JOURNAL

CHECKS	CASH	NET PAYMENT	DATE	NAME	BALANCE	DESCRIPTION		CONTRI- BUTIONS	500 CLUB	CENTURY FUND	MEMBER- SHIPS	JEFF - JACK TICKETS	JEFF - JACK ADS	PRESIDENTS CLUB	SPECIAL EVENTS	BINGO	MISC- ELLANEDUS
67.00		67.00	10/1/86	BATCH MEMBERSHIP	67.00	86 MRS	F					67.00					
15.00		15.00	10/1/86	INGHAM, LEM PARTI	82.00	86 MRS	1					63.00					
				86 CF FOR ROGER A. RAPHAEL		86 CF	2			90.00							
100.00		100.00	10/1/86	KENNETH N. HILTON	100.00	86 CF	3			100.00							
125.00		125.00	10/1/86	LEON S. CONAN	125.00	86 500CL PAY	4		125.00								
25.00		25.00	10/1/86	LADON E. CUNNINGHAM	25.00	86 500CL FINAL	5					25.00					
9000.00		9000.00	10/1/86	CAMPAIGN '86 - MDP	10081.00	TRANS	6										9000.00
							7										
							8										
							9										
							10										
							11										
							12										
							13										
							14										
							15										
							16										
							17										
							18										
							19										
							20										
							21										
							22										
							23										
							24										
							25										
							26										
							27										
							28										
							29										
							30										
							T										
									125.00	190.00	130.00	25.00					9000.00

CHECKS ONLY ☐ 90470.00

SUBTRACT ENCIRCLED ITEMS

TOTALS ☐ 90470.00

SHEET ONLY

ND TOTAL ☐ 90470.00

SHEETS

CASH PROOF ON HAND START OF DAY + ALL CHECKS AND CASH REC'D - BANK DEPOSIT ON HAND END OF DAY

PAGE NO. 10/7/86

DATE 10/7/86

OCTOBER 19 86

10/7/86

91040332758

NB D

Transaction Receipt

This is your receipt for the transaction described below.

First Line Shows: Bank—Branch—Teller, Process Date (Effective Date), Transaction Code

032-005-04 10/09/86 () 7C-00
DOM 86102-34 37,679.00 DE 1410

Second Line Shows: Account Type, Account Number, Amount, Transaction Type, Sequence No.
480 177110 Rev 888 (Code Debit/Withdrawal on Reverse Side)

1072000325

LAURENCE - GILMAN OFFICE 10
NATIONAL BANK
OF DETROIT
DETROIT, MICHIGAN

MICHIGAN DEMOCRATIC
STATE CENTRAL COMMITTEE

REC TAPE	2.00
CHURCH	42.00
MKS/IN/WH/EL	25.00
OC/ALIA OC	70.00
BILL	100.00
BANKOW	125.00
INGHAM CR	135.00
M. VUW PAE	634.00
MSCE BINGO	5000.00
MSCE BINGO	1000.00
MSCE BINGO	2000.00
MSCE BINGO	2000.00
MSCE BINGO	2000.00
MSCE BINGO	5000.00
MSCE BINGO	5000.00
MSCE BINGO	10.00

39679.00

9 October 86

ACCOUNT OF

CASH RECEIPTS JOURNAL

040332759

CHECKS	CASH	NET PAYMENT	DATE	NAME	BALANCE	DESCRIPTION	CONTRIBUTIONS	300 CLUB	CENTURY FUND	MEMBERSHIPS	JEFF - JACK TICKETS	JEFF - JACK ADS	PRESIDENT'S CLUB	JEFF - JACK EXPENSE	MEMO	USEC. ELLAREOUS
44.00	2.00	44.00	10/2	BATCH MEMBERSHIP	44.00	REWARDS	F			44.00						
125.00		125.00	10/2	LOUIS S. BELL	250.00	SOC CL FINAL	1	125.00								
125.00		125.00	10/2	MAURICE S. RINKOW	125.00	S. S. RINKOW F.A.C.	2	125.00								
100.00		100.00	10/10	RON CANALA O.E.F.	100.00	O.E.F.	3		100.00							
10.00		10.00	10/2	GEORGE WIKI'S	20.00	SALE	4	10.00								
10.00		10.00	10/2	BERT F. MARSHOWSKI	10.00	CONT.	5	10.00								
25.00		25.00	10/2	PATRICIA A. OMIE	50.00	ILLINOIS	6			25.00						
2000.00		2000.00	10/2	MID DEM POLICY CATERING	7400.00	RINGO	7								2000.00	
1000.00		1000.00	10/2	MID SEC LINGO	5000.00	BINGO	8								1000.00	
6240.00		6240.00	10/2	INGHAM CTH. DEM. PARTY	6728.00	CONT.	9								6240.00	
5000.00		5000.00	10/2	MI. DEM. PAC	45500.00	CONT.	10								5000.00	
20000.00		20000.00	10/2	COMMITTEE FOR THE FUTURE OF MICHIGAN	30000.00	CONT.	11				30000.00					
5000.00		5000.00	10/2	HOUSE DEM. VICTORY FUND	5000.00	CONT.	12				5000.00					
							13									
							14									
							15									
							16									
							17									
							18									
							19									
							20									
							21									
							22									
							23									
							24									
							25									
							26									
							27									
							28									
							29									
							30									
							T	40.00	250.00	100.00	44.00	25.00	30000.00		1240.00	3400.00

CHECKS ONLY 39679.00
 SUBTRACT ENCLOSED 2.00
 NET 39677.00
 TALS 39679.00
 NET ONLY 39679.00
 D TOTAL 39679.00
 SHEETS

CASH PROOF: ON HAND START OF DAY + ALL CHECKS + AND CASH REC'D - BANK DEPOSIT ON HAND END OF DAY

PAGE NO. 1
 DATE 10/2-9/86

TOBER 11.86



Transaction Receipt

This is your receipt for the transaction described below.

First Line Shows: Date—Branch—Teller—Process Date (Effective Date), Transaction Code

011-000-00-11/01/86 () 57-00
000 0002-12 400.00 02/0/10

Second Line Shows: Account Type, Account Number, Amount, Transaction Type, Sequence No.
AND 177-10 (See Code Definitions on Reverse Side)



LAURENCE, CHAS. B. OFFICE, 17
NATIONAL BANK
OF DETROIT
DETROIT, MICHIGAN

10720003254

BB102-34
PKTAGE
BAUFE
JANUARY

30.00
800.00
150.00

5

45000

1000000

20

DEPOSIT FOR ACCOUNT OF

ACCOUNT NO. _____

CASH RECEIPTS JOURNAL

CHECKS	CASH	NET PAYMENT	DATE	NAME	BALANCE	DESCRIPTION	CONTRIBUTIONS	900 CLUB	CENTURY FUND	MEMBER- SHIPS	JEFF - JACK TICKETS	JEFF - JACK AGE	PRESIDENT'S CLUB	SPECIAL EVENTS	OTHER
30.00		30.00	10/1/56	BATCH MEMBERSHIP	30.00	91 MBES	F			30.00					
30.00		30.00	10/1/56	JOHN J. KUEP	30.00	450 PL BAL	1	30.00							
100.00		100.00	10/1/56	DONALD C. JENNINGS	100.00	86 CC	2		100.00						
50.00		50.00	10/1/56	MARGARET JENNINGS	50.00	56 PAT	3			50.00					
							4								
							5								
							6								
							7								
							8								
							9								
							10								
							11								
							12								
							13								
							14								
							15								
							16								
							17								
							18								
							19								
							20								
							21								
							22								
							23								
							24								
							25								
							26								
							27								
							28								
							29								
							30								
SUB TOTALS							T		300.00	100.00	70.00				
TOTALS THIS SHEET ONLY															
GRAND TOTAL															
FOR 1 SHEETS															

DATE 1 OCT 8 1956

CASH PROOF: ON HAND START OF DAY + ALL CHECKS AND CASH REC'D - BANK DEPOSIT - ON HAND END OF DAY

PAGE NO.
DATE 10/1/56

21040332762

Transaction Receipt

• This is your receipt for the transaction described below.

First Line Shows:	Bank—Branch—Teller	Process Date (Effective Date)	Transaction Code
-------------------	--------------------	-------------------------------	------------------

032-006-01 10/10/86 () TC-00
D0A 86102-34 52 022.95 DE 1970

Second Line Shows: Account Type, Account Number, Amount, Transaction Type, Sequence No.
 USD 177.13 Rev 565 (Code Definitions on Reverse Side)

107200032612

**NATIONAL BANK
OF DETROIT**
LANSING - CHL. BUS. OFFICE - 72

MICHIGAN DEMOCRATIC
STATE CENTRAL COMMITTEE[illegible]

5202295
10 Oct 1945

DATE	BINGO	MISC. ELLANIEUS
2500.00		
4500.00		
3000.00		
		100
		10
		250

FOR ACCOUNT OF

NO.

21540332763

CASH RECEIPTS JOURNAL

CHECKS		CASH	NET PAYMENT	DATE	NAME	BALANCE	DESCRIPTION	CONTRIBUTIONS	500 CLUB	CENTURY FUND	MEMBERSHIPS	JEFF - JACK TICKETS	MC GREGG	PICK	PRESIDENT'S CLUB	BOOK EVENTS	BOOK	BOOK ELLAMOUS
15.00			15.00	10/9/86	BATEH MEMBERSHIP	15.00	PN W.R.S	F			15.00							
25.00			25.00	10/9/86	EATON LEADERSHIP FUND	25.00	CONT.	1										
45.00			45.00	10/9/86	DEAL LEADERSHIP FUND	45.00	CONT.	2										
50.00			50.00	10/9/86	MI ST. AFL-CIO GOLF CONT.	50.00	CONT.	3	1000.00									
14807.15			14807.15	10/9/86	FRIENDS OF DON KOVISTO	14807.15	CONT.	4					14807.15					
100.00			100.00	10/9/86	WAYNE CITY CLERK	100.00	REFUND	5										100.00
					CAND. FILING FEE ACCT.		REFUND	6										
100.00			100.00	10/9/86	WAYNE CITY CLERK	100.00	REFUND	7										100.00
					CAND. FILING FEE ACCT.		REFUND	8										
3500.00			3500.00	10/9/86	CAMPAIGN "R" ACCT.	3500.00	REFUND	9										
								10										
								11										
								12										
								13										
								14										
								15										
								16										
								17										
								18										
								19										
								20										
								21										
								22										
								23										
								24										
								25										
								26										
								27										
								28										
								29										
								30										
								T	2000.00		15.00		14807.15			1000.00		3500.00

CHECKS ONLY ☐ 52022.95
 SUBTRACT ENCLOSURE ITEMS
 TOTALS ☐ 52022.95
 115 SHEET ONLY
 RAND TOTAL ☐ 52022.95
 1 SHEETS

CASH PROOF ON HAND
START OF DAYALL CHECKS
+ AND CASH REC'D

- BANK DEPOSIT

ON HAND
- END OF DAY

PAGE NO. 1
 DATE 10/10/86

OCTOBER 1986

21040332764

**NATIONAL BANK
OF DETROIT**
LAFAYETTE • CHILDS OFFICE • 17

1:07 2000 3 26:

2.2

MICHIGAN DEMOCRATIC
STATE CENTRAL COMMITTEE

DATE	DESCRIPTION	AMOUNT
8/25/00	BANKS	514.00
8/25/00	WELLS	178.43
8/25/00	WELLS	553.30
8/25/00	WELLS	529.75
8/25/00	WELLS	224.18
8/25/00	WELLS	900000.00
8/25/00	WELLS	300.00

THIS PAGE (101629 66)
151- (5233 14)

08 68901

15 Oct. 1962 82

**NATIONAL BANK
OF DETROIT**
MEMBER, FDIC

107 20003 2612

2/14/2

MICHIGAN DEMOCRATIC
STATE CENTRAL COMMITTEE

1100	1250	1300	1350	1400	1450	1500	1550	1600	1650	1700	1750	1800	1850	1900	1950	2000	2050	2100	2150	2200	2250	2300	2350	2400	2450	2500	2550	2600	2650	2700	2750	2800	2850	2900	2950	3000	3050	3100	3150	3200	3250	3300	3350	3400	3450	3500	3550	3600	3650	3700	3750	3800	3850	3900	3950	4000	4050	4100	4150	4200	4250	4300	4350	4400	4450	4500	4550	4600	4650	4700	4750	4800	4850	4900	4950	5000	5050	5100	5150	5200	5250	5300	5350	5400	5450	5500	5550	5600	5650	5700	5750	5800	5850	5900	5950	6000	6050	6100	6150	6200	6250	6300	6350	6400	6450	6500	6550	6600	6650	6700	6750	6800	6850	6900	6950	7000	7050	7100	7150	7200	7250	7300	7350	7400	7450	7500	7550	7600	7650	7700	7750	7800	7850	7900	7950	8000	8050	8100	8150	8200	8250	8300	8350	8400	8450	8500	8550	8600	8650	8700	8750	8800	8850	8900	8950	9000	9050	9100	9150	9200	9250	9300	9350	9400	9450	9500	9550	9600	9650	9700	9750	9800	9850	9900	9950	10000
------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	------	-------

15 October 86

(5233 14)

Transaction Receipt

This is your receipt for the transaction described below.

First Line Shows: Bank—Branch—Year, Process Date (Effective Date), Transaction Code

Campagne '84

132-006-04 10/15/16 () 12-08
004 16102-34 106.862.88 DE 1808

Second Line Shows: Account Type, Account Number, Amount, Transaction Type, Sequence No.

1993-1994, 10 Ave 1993 (Code Definitions on Average Size)

DEPOSIT FOR ACCOUNT OF

ACCOUNT NO.

21040332765

CASH RECEIPTS JOURNAL

NET PAYMENT	DATE	NAME	BALANCE	DESCRIPTION	CONTRIBUTIONS	500 CLUB	CENTURY FUND	MEMBER SHIPS	JEFF - JACK TICKETS	JEFF - JACK	PRESIDENTS CLUB	REGAN	EMER	REC. BALANCE
42 00	10/5/82	DARTMOUTH MEMBERSHIP	42 00	MEMBERS	F				12 00					
2 50	10/5/82	INTERNATIONAL DEMOCRATIC	46 00	118 C	1			2 00						
125 00	10/5/82	THOMAS H. HEALY	125 00	125 00	2	125 00								
9000 00	10/5/82	CAMPAIGN '82 - HDP	11231 00	TELETS	3									9000 00
9000 00	10/5/82	AREA - PAC	31500 00	CONF	4							9000 00		
514 60	10/5/82	BARNES FOR STATE REP. CAITE	514 60	LIT	5									514 60
789 65	10/5/82	FRIENDS OF KAY DEARD	789 65	LIT	6									789 65
39 50	10/5/82	CITIZENS FOR JOHN BLANNETT	39 50	LIT	7									39 50
178 43	10/5/82	CAITE TO ELECT U.S. SEN	178 43	LIT	8									178 43
224 18	10/5/82	CHRISTOPHER D. DINGELL	224 18	LIT	9									224 18
1550 53	10/5/82	FRIENDS OF FAUST	1550 53	LIT	10									1550 53
295 30	10/5/82	HART FOR ST. SEN. CAITE	295 30	LIT	11									295 30
300 00	10/5/82	JOHN H. KOPKA	300 00	LIT	12									300 00
275 65	10/5/82	BILL KEITH FOR CONGRESS	275 65	LIT	13									275 65
444 78	10/5/82	KOSTOVA FOR STATE REP	444 78	LIT	14									444 78
829 75	10/5/82	CAITE TO ELECT P.C. MACK	829 75	LIT	15									829 75
224 18	10/5/82	CAITE TO ELECT U.S. SEN	224 18	LIT	16									224 18
		O'NEIL			17									
224 18	10/5/82	JOSEPH PALAMARA OEF	224 18	LIT	18									224 18
103 70	10/5/82	CITIZENS FOR JONNIS PETERSON	103 70	LIT	19									103 70
518 50	10/5/82	CAITE TO ELECT U.S. SEN	518 50	LIT	20									518 50
		LANA POLLACK			21									
61 73	10/5/82	E.J. PLENIERKI O.H.A.	61 73	LIT	22									61 73
217 13	10/5/82	KATHY A. REILLY WHITE	217 13	LIT	23									217 13
113 88	10/5/82	ELECT DON SHERIDAN CON	113 88	LIT	24									113 88
103 70	10/5/82	JOSEPH J. MAKULIS	103 70	LIT	25									103 70
61 73	10/5/82	RICHARD A. YOUNG	61 73	LIT	26									61 73
553 30	10/5/82	THOMAS HEALY COMMITTEE	553 30	LIT	27									553 30
					28									
					29									
					30									
					T			125 00	44 00			9000 00		9269 00

SUB TOTALS ☐ 106862.50

CHECKS ONLY ☐ SUBTRACT ENCLOSURE

TOTALS THIS SHEET ONLY ☐

GRAND TOTAL ☐ 106862.50

FOR 1 SHEETS

CASH PROOF: ON HAND START OF DAY

ALL CHECKS + AND CASH REC'D

BANK DEPOSIT

ON HAND END OF DAY

PAGE NO.

DATE 10/5/82

DATE 15 OCTOBER 1982

T FOR ACCOUNT OF

CASH RECEIPTS JOURNAL

CHECKS	CASH	NET PAYMENT	DATE	NAME	BALANCE	DESCRIPTION		CONTRIBUTIONS	900 CLUB	CENTURY FUND	MEMBERSHIPS	JEFF - JACK TICKETS	JEFF - JACK ADS	PRESIDENTS CLUB	SPECIAL EVENTS	BINGO	MISC. ELANEOUS
50.00		20.00	10/16/12	BOY & ALUMBERSHIP	20.00	8.00	F				20.00						
20.00		20.00	10/16/12	KESTIN J WILFE	20.00	11.50	1	20.00									
14.00		14.00	10/16/12	DELTA CITY DEPT. PMFE	104.00	8.00	2				4.00						
445.12		445.12	10/16/12	MI. DEM. STATE CONF. CONF.	1318	75.00	3										445.12
2200.00		2200.00	10/16/12	CONF. CONF.	21.00	1.00	4										2200.00
4500.00		4500.00	10/16/12	LEADERSHIP FUND	9000.00	CONF.	5								4500.00		
2500.00		2500.00	10/16/12	JOEL FEENSON (NO)	2500.00	REIMBURSE	6										2500.00
							7										
							8										
							9										
							10										
							11										
							12										
							13										
							14										
							15										
							16										
							17										
							18										
							19										
							20										
							21										
							22										
							23										
							24										
							25										
							26										
							27										
							28										
							29										
							30										
							T	20.00			34.00				4500.00		2875.12

CHECKS ONLY ☒ SUBTRACT ENCLOSURE ITEMS

TOTAL ☒

SHEET ONLY ☐

AND TOTAL ☒ 1449.12

SHEETS ☐

CASH PROOF: ON HAND START OF DAY + ALL CHECKS + AND CASH REC'D - BANK DEPOSIT ON HAND END OF DAY

PAGE NO.

DATE 10/16/12

1 OCTOBER 1984

2104033:768

Transaction Receipt

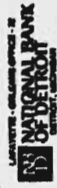
This is your receipt for the transaction described below.

First Line Shows: Bank—Branch—Year, Process Date (Effective Date), Transaction Code

DSCC

032-006-06 10/17/86 136502.00 *cash on hand*
DMM 86102-34 136,052.00 *to follow*

Second Line Shows: Account Type, Account Number, Amount, Transaction Type, Sequence No.
MID 1771-10 Rev 100 (Cash Withdrawal or Reverse Side)



MICHIGAN DEMOCRATIC
STATE CENTRAL COMMITTEE

0072000325

2.00	
99.00	PER TAPE
2250.00	1742 BUS.
9216.00	1742 BUS.
1040.00	18444444
140.00	228 BUS.
250.00	860000
500.00	ATM WITHDRAWALS
3000.00	CASH PURCHASE
90000.00	CASH
25000.00	CASH

136502.00
17 Oct 86 136502.00

POSIT FOR ACCOUNT OF

OUNT NO

CASH RECEIPTS JOURNAL

CHECKS	CASH	NET PAYMENT	DATE	NAME	BALANCE	DESCRIPTION	CONTRIBUTIONS	500 CLUB	CENTURY FUND	MEMBER SHIPS	JEFF - JACK TICKETS + A.S.	JEFF - JACK ADD	PRESIDENT'S CLUB	SPECIAL EVENTS	DUO	REC. ELLAMENS
42.00	2.00	42.00	10/14	BATCH MEMBERSHIP	42.00	SEMO'S	F				42.00					
140.00		140.00	10/14	300 LONG DIST. DEM. CATE	140.00	1/42	1				140.00					
500.00		500.00	10/14	COMMITTEE TO RETAIN	500.00	221MB	2									500.00
				ARCHIEON - PINGUS			3									
250.00		250.00	10/14	PAUL W. BRAUN	250.00	REVALB	4									250.00
3000.00		3000.00	10/14	COMMITTEE FOR THE	3000.00	CONT	5					3000.00				
				FUTURE OF N. HUGEN			6									
25000.00		25000.00	10/15	CAMPAIGN '86 - AJP	1148100.00	TRANS	7									25000.00
90000.00		40000.00	10/15	CAMPAIGN SC	1238100.00	TRANSFER	8									90000.00
5250.00		5250.00	10/16	OFF. 17th DIST. DEM. PARTY	5250.00	CONT	9									5250.00
4210.00		4210.00	10/16	OFF. 17th DIST. DEM. PARTY	9530.00	CONT	10									4210.00
9040.00		9040.00	10/16	INGHAM CTY. DEM. PARTY	14768.00	CONT - CS	11									9040.00
							12									
							13									
							14									
							15									
							16									
							17									
							18									
							19									
							20									
							21									
							22									
							23									
							24									
							25									
							26									
							27									
							28									
							29									
							30									
							T									
										42.00	140.00	3000.00			17570.00	115750.00

SUB TOTALS ☒ 136500.00 ☒ 2.00

CHECKS ONLY SUBTRACT MEMBERSHIP

TOTALS THIS SHEET ONLY ☒

GRAND TOTAL ☒ 136502.00

FOR 1 SHEETS

CASH PROOF. ON HAND START OF DAY ALL CHECKS + AND CASH REC'D - BANK DEPOSIT ON HAND - END OF DAY

PAGE NO. 10/17/82

DATE 17 OCTOBER 1982

31540332770



Transaction Receipt

This is your receipt for the transaction described below.

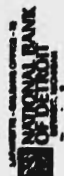
First Line Shows: Bank—Branch—Teller Process Date (Effective Date), Transaction Code

DSEC

032-004-05 10/20/86 17 TC-00
004 86102-34 69,578.64 DE 0712

Second Line Shows: Account Type, Account Number, Amount, Transaction Type, Sequence No

MD 177110 Rev. 9/81 (Code Debit/Debit on Reverse Side)



MICHIGAN DEMOCRATIC
STATE CENTRAL COMMITTEE

072000326

PLZ TAPE	33.00
PLZ DIST.	2250.00
PLZ DIST. CH.	1500.00
PLZ DIST. CH.	11000.00
PLZ DIST. CH.	1300.00
PLZ DIST. CH.	1000.00
PLZ DIST. CH.	1009.95
PLZ DIST. CH.	1.00
PLZ DIST. CH.	15.00
PLZ DIST. CH.	250.00
PLZ DIST. CH.	440.29
PLZ DIST. CH.	1400.00
PLZ DIST. CH.	17500.00

69578 64
20 OCTOBER 86

FOR ACCOUNT OF

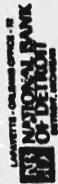
CASH RECEIPTS JOURNAL

CHECKS	CASH	NET PAYMENT	DATE	NAME	BALANCE	DESCRIPTION	CONTRIBUTIONS	500 CLUB	CENTURY FUND	MEMBERSHIPS	JEFF - JACK TICKETS	JEFF - JACK ADS	PRESIDENT'S CLUB	SPECIAL EVENTS	BINGO	MISC. ELLANEOUS
14 32 00		53 00	7/10/86	BATCH MEMBERSHIP	33 00	86 MICS	F									
8500 00		8500 00	7/10/86	ALLIANCE FOR THE ENVIRONMENT			1									8500 00
1009 75		1009 75	7/10/86	MICHIGAN BELL	104 32	RIEUNO (M)	2									1009 75
7300 00		7300 00	7/10/86	15th CD DEM ORGANIZATION	7300 00	CONT.	3							7300 00		
2250 00		2250 00	7/10/86	17th D. SEN. PARTY (C)	2250 00	CONT.	4							2250 00		
11000 00		11000 00	7/10/86	REGIONAL D. NAW PAC	11000 00	CONT.	5							11000 00		
1000 00		1000 00	7/10/86	AUSTRO PT. AEL-RO CACI		DRUGS CONT.	6							1000 00		
800 00		800 00	7/10/86	SENIOR CRY. DEM PARTY		CLUB FUND '86	7			8 00						
1500 00		1500 00	7/10/86	BATCH CONTRIBUTION (L. G. 15)	15 00	CONT.	8	15 00								
250 00		250 00	7/10/86	RE-ELECT BARBARA	500 00	CONT.	9									250 00
				SAVING FOR MISOTHEIST			10									
		2500 00	7/10/86	SALAS FOR STATE 22	2500 00	DRUGS	11									2500 00
				1980. CAMPAIGN CH. F.			12									
9462 89		9462 89	7/10/86	TRANSFERS FOR STATE			13									9462 89
16000 00		16000 00	7/10/86	CAMPAIGN '86	125410 00	TRANSFER	14									16000 00
125410 00		125410 00	7/10/86	CAMPAIGN '86	12716 00	TRANSFER	15									125410 00
							16									
							17									
							18									
							19									
							20									
							21									
							22									
							23									
							24									
							25									
							26									
							27									
							28									
							29									
							30									
							T	15 00		41 00				14530 00		12712 64

CASH PROOF: ON HAND START OF DAY _____ ALL CHECKS + AND CASH REC'D _____ - BANK DEPOSIT _____ ON HAND = END OF DAY _____

PAGE NO. _____
DATE 10/26/86

1540332772



MICHIGAN DEMOCRATIC
STATE CENTRAL COMMITTEE

⑆072000326⑆

86102-34

3
4 -
16 -
600 -
500 -
1500 -

3100 N.E. CORP.
1000 E. 100
C.

15166 00

22 volume



Transaction Receipt

This is your receipt for the transaction described below.

First Line Shows: Bank-Branche-Yeller, Previous Date (Blotches Dark, Transaction Code

dscc

032-000-00 10/22/86 3 FE-83
BIN 06102-34 15-166.00 DE 2009

Second Line Shows: Account Type, Account Number, Amount, Transaction Type, Signature No.
MID 1771-18 Per. and Child Delinquent on Previous Date.

DEPOSIT FOR ACCOUNT OF

ACCOUNT NO.

CASH RECEIPTS JOURNAL

NET PAYMENT	DATE	NAME	BALANCE	DESCRIPTION	CONTRIBUTIONS	BOO CLUB	CENTURY FUND	MEMBER SHIPS	JEFF - JACK TICKETS	JEFF - JACK ADS	PRESIDENT'S CLUB	SPECIAL JOINTS	BRNO	REC. ELLANOUS
14.00	10/12/80	BRECH MEMBERSHIPS	16.00	8 MEMBERS	F			16.00						
65.00	10/12/80	JEFF. JACK. TICKETS. F. M.	16.00	1	65.00									
500.00	10/12/80	JEFF. JACK. TICKETS. F. M.	16.00	2								50.00		
14000.00	10/12/80	JEFF. JACK. TICKETS. F. M.	16.00	3										14000.00
				4										
				5										
				6										
				7										
				8										
				9										
				10										
				11										
				12										
				13										
				14										
				15										
				16										
				17										
				18										
				19										
				20										
				21										
				22										
				23										
				24										
				25										
				26										
				27										
				28										
				29										
				30										
				T				16.00				50.00		14000.00

CHECKS ONLY	SUBTRACT ENCLOSED ITEMS
15164.00	2.00
NET ONLY	15166.00
GRAND TOTAL	15166.00
SHEETS	

CASH PROOF: ON HAND START OF DAY + ALL CHECKS AND CASH REC'D - BANK DEPOSIT ON HAND END OF DAY

PAGE NO.	10/20/80
DATE	10/20/80

22 OCTOBER 1980

91040332774

Transaction Receipt

This is your receipt for the transaction described below.

First Line Shows: Bank--Branch--Teller, Process Date (Effective Date), Transaction Code

Ascc

032-006-09 10/23/86 () 12-00
000 86102-34 34,547.53 DE 0340

Second Line Shows: Account Type, Account Number, Amount, Transaction Type, Sequence No.

1:07 2000 3 26:

20

**MICHAEL DEMOCRATIC
STATE CENTRAL COMMITTEE**

86 10 2-340

	DATE	AMOUNT	BALANCE
CASH ON HAND	10-01-68	100.00	100.00
PAYROLL	10-01-68	250.00	150.00
RENT	10-01-68	250.00	100.00
ELECTRICITY	10-01-68	100.00	00.00
WATER BILLS	10-01-68	200.00	200.00
INSURANCE	10-01-68	200.00	00.00
REPAIRS	10-01-68	150.00	150.00
TOTAL	10-01-68	1000.00	1000.00

34547 58

23 October

DEPOSIT FOR ACCOUNT OF

ACCOUNT NO.

CASH RECEIPTS JOURNAL

CHECKS	CASH	NET PAYMENT	DATE	NAME	BALANCE	DESCRIPTION	CONTRIBUTIONS	500 CLUB	CENTURY FUND	MEMBER SHIPS	JEFF - JACK TICKETS	JEFF - JACK ADS	PRESIDENTS CLUB	SPECIAL EVENTS	BINGO	MISC. - ELLAHOUS
50.00		50.00	7/24/80	BARTON MEMBERSHIP	50.00	MEMBERS	F			50.00						
10.00		10.00	7/25/80	WTE TRFECT - WILKIE FIELD	10.00	WILKIE	1			10.00						
36.00		36.00	7/25/80	WILKIE CITY DEM PARTY	36.00	WILKIE	2			36.00						
10.00		10.00	7/25/80	WILKIE CITY DEM PARTY	10.00	WILKIE	3			10.00						
2.00		2.00	7/25/80	WILKIE CITY DEM PARTY	2.00	WILKIE	4									
1500.00		1500.00	7/25/80	WILKIE CITY DEM PARTY	1500.00	WILKIE	5								2000.00	
2421.81		2421.81	7/25/80	WILKIE CITY DEM PARTY	2421.81	WILKIE	6								1500.00	
16281.81		16281.81	7/25/80	WILKIE CITY DEM PARTY	16281.81	WILKIE	7								2421.81	
5000.00		5000.00	7/25/80	WILKIE CITY DEM PARTY	5000.00	WILKIE	8			5000.00						
5000.00		5000.00	7/25/80	WILKIE CITY DEM PARTY	5000.00	WILKIE	9			5000.00						
2500.00		2500.00	7/25/80	WILKIE CITY DEM PARTY	2500.00	WILKIE	10									2000.00
2000.00		2000.00	7/25/80	WILKIE CITY DEM PARTY	2000.00	WILKIE	11									2000.00
							12									
							13									
							14									
							15									
							16									
							17									
							18									
							19									
							20									
							21									
							22									
							23									
							24									
							25									
							26									
							27									
							28									
							29									
							30									
							T			10000.00						

CHECKS ONLY 34547.58

TOTALS 34547.58

GRAND TOTAL 34547.58

FOR 1 SHEETS

CASH PROOF: ON HAND START OF DAY + ALL CHECKS AND CASH REC'D - BANK DEPOSIT ON HAND END OF DAY

PAGE NO. 1

DATE 10/23/80

TE 23 OCTOBER 1980

3 1 4 0 3 3 2 7 7 6



dsc

TRANSACTION RECEIPT

(This entry indicates information for customer record)

FIRST LINE SHOWS: Bank-Branch-Teller, Payment Date, Transaction Code

012-088-07 10/24/86 () 7E-00
00H 86102-34 38,004.05 DE 2970

SECOND LINE SHOWS:

See 17th at 8611 8-94

Credit Definition on Reverse Side

Sequence No.

00720003254



NATIONAL BANK OF CHICAGO
MEMBER FDIC
STATE CAPITAL COMMITTEE

86102-34
11/24/86
012-088-07
38,004.05
DE 2970

3800407

30

2405042

POSIT FOR ACCOUNT OF

COUNT NO.

21040332777

CASH RECEIPTS JOURNAL

CHECKS	CASH	NET PAYMENT	DATE	NAME	BALANCE	DESCRIPTION	CONTRIBUTIONS	100 CLUB	CENTURY FUND	MEMBER SHIPS	JEFF - JACK TICKETS	JEFF - JACK ADS	PRESIDENT'S CLUB	SPECIAL EVENTS	BINGO	MISC. ILLANEOUS
35600.00		35600.00	10/24/86	PROG'S CITY 2 UNIT/RF	10500.00		F									2000.00
404.05		404.05	10/24/86	ASNE/DEM VICTORY FUND	404.05	CONT	1	404.05								
35600.00		35600.00	10/24/86	CAMPAIGN '86	1307200.00	TRANSFER	2									35600.00
							3									
							4									
							5									
							6									
							7									
							8									
							9									
							10									
							11									
							12									
							13									
							14									
							15									
							16									
							17									
							18									
							19									
							20									
							21									
							22									
							23									
							24									
							25									
							26									
							27									
							28									
							29									
							30									
							T	404.05								37600.00

CHECKS ONLY	SUBTRACT UNRECORDED ITEMS
TOTALS ☒ 38004.05	
THIS MONTH ONLY ☒	
GRAND TOTAL ☒ 38004.05	
ON 1 SHEETS	

CASH PROOF: ON HAND START OF DAY _____ ALL CHECKS + AND CASH REC'D _____ BANK DEPOSIT _____ ON HAND END OF DAY _____

PAGE NO. _____
DATE 10/24/86

24 OCTOBER 1986

21040332778



Transaction Receipt

This is your receipt for the transaction described below.

First Line Shows: Bank—Branch—Teller, Account Date (Effective Date), Transaction Code

DSCC

888-004-34 10/23/86 11,286.60 DE 0430

Second Line Shows: Account Type, Account Number, Amount, Transaction Type, Sequence No.
MSD 1771-18 Rev. 8/85 (Code Definitions on Reverse Side.)



National Bank of Detroit
Detroit, Michigan 48201

MICHIGAN DEMOCRATIC
STATE CENTRAL COMMITTEE

00720003260

86102-34
NEW TRAIL 36.00
MILEAGE 250.00
VIA AIR MAIL 250.00
SERIALS 9500.00
LOW COST 4000.00

11286.00

2100282C R

DEPOSIT FOR ACCOUNT OF

ACCOUNT NO.

CASH RECEIPTS JOURNAL

CHECKS	CASH	NET PAYMENT	DATE	NAME	BALANCE	DESCRIPTION	CONTRIBUTIONS	500 CLUB	CENTURY FUND	MEMBERSHIPS	JEFF - JACK TICKETS	JEFF - JACK ADS	PRESIDENTS CLUB	SPECIAL EVENTS	BINGO	MISC. ELLANEOUS
36.00		36.00	12/18	DAFCA MEMBERSHIP	36.00		F				36.00					
250.00		250.00	12/18	RE-ELECT ANNETTA MILLER	250.00	REIMB.	1									250.00
2500.00		2500.00	12/18	DEM. ACFC. INT. / 111	2500.00	CONT	2	2500.00								
4500.00		4500.00	12/18	DEM. LEADERSHIP FUND	4500.00	CONT	3							4500.00		
4000.00		4000.00	12/18	REGIONAL D. VAN PACE	15000.00	CONT	4							4000.00		
							5									
							6									
							7									
							8									
							9									
							10									
							11									
							12									
							13									
							14									
							15									
							16									
							17									
							18									
							19									
							20									
							21									
							22									
							23									
							24									
							25									
							26									
							27									
							28									
							29									
							30									
SUB TOTALS							T	2500.00			36.00			4500.00		250.00
TOTALS																
THIS SHEET ONLY																
GRAND TOTAL																
FOR 1 SHEETS																

DATE 21 OCT 08

CASH PROOF: ON HAND START OF DAY ALL CHECKS + AND CASH REC'D - BANK DEPOSIT ON HAND END OF DAY

PAGE NO. 14/22/08

21040, 32780



Transaction Receipt

This is your receipt for the transaction described below.

First Line Shows: Bank—Branch—Year, Process Date (Effective Date), Transaction Code

MDSCC

032-006-99 10/28/86 (1 IC-18)
DON 86/02-34 2-812.00 CL 8798

Second Line Shows: Account Type, Account Number, Amount, Transaction Type, Sequence No.
MID 1771-18 Rev. 100 (Code Definitions on Reverse Side.)

00720003250



MICHIGAN DEMOCRATIC
STATE CENTRAL COMMITTEE

88 102 34

MDSCC BANK
MPC BANK

2018 00

10/28/86

POSIT FOR ACCOUNT OF

COUNT NO.

CASH RECEIPTS JOURNAL

CHECKS	CASH	NET PAYMENT	DATE	NAME	BALANCE	DESCRIPTION	CONTRIBUTORS	500 CLUB	CENTURY FUND	MEMBER SHIPS	JEFF - JACK TICKETS	JEFF - JACK ADS	PRESIDENT'S CLUB	SPECIAL EVENTS	BINGO	MISC. ELLAREOUS
18.00		18.00	10/21/80	Salina County Dem. Party	54.00	R. Rogers	F				18.00					
1000.00		1000.00	10/21/80	MINI-MART CHICKEN 2.40	250.00	B. N. G. O.	1								1000.00	
1000.00		1000.00	10/21/80	1000 B. N. G. O.	3.00	B. N. G. O.	2								1000.00	
							3									
							4									
							5									
							6									
							7									
							8									
							9									
							10									
							11									
							12									
							13									
							14									
							15									
							16									
							17									
							18									
							19									
							20									
							21									
							22									
							23									
							24									
							25									
							26									
							27									
							28									
							29									
							30									
							T									

CHECKS ONLY
TOTALS 2018.00

SUBTRACT ENCLOSURE ITEMS

TOTALS THIS SHEET ONLY 0

GRAND TOTAL 2018.00

ON 1 SHEETS

RE 28 OCTOBER 1980

CASH PROOF ON HAND START OF DAY ALL CHECKS + AND CASH REC'D BANK DEPOSIT ON HAND END OF DAY

PAGE NO. 10/24/80
DATE 10/24/80

210403.33782

Transaction Receipt

This is your receipt for the transaction described below.

First Last Street	Bank-Branch-Teller	Process Date (Effective Date)	Transaction Code

3

2254

052-006-05 10/24/86 () 17-00
DPA B6102-34 16,129.00 OF 0030

.....! See Show: Account Type, Account Number, Amount, Transaction Type, Sequence No.

171.10 Bus. and Code Dictations on Reverses (Slide.)



**MICHIGAN DEMOCRATIC
STATE CENTRAL COMMITTEE**

B

0720003261

DATE	DESCRIPTION	AMOUNT
8/10/23	1st. Table	50.00
8/10/23	2nd. Table	35.00
8/10/23	3rd. Table	100.00
8/10/23	4th. Table	500.00
8/10/23	5th. Table	1500.00
8/10/23	6th. Table	400.00
8/10/23	7th. Table	3500.00
8/10/23	8th. Table	10000.00
8/10/23	9th. Table	2.50

21 Oct. Tue 82
86529 CO

2154033733

CASH RECEIPTS JOURNAL

[illegible]

CASH PROOF ON HAND START OF DAY _____ + ALL CHECKS _____ - BANK DEPOSIT _____ = ON HAND END OF DAY _____

DATE 29 OCTOBER 1982

91040632784



Transaction Receipt

This is your receipt for the transaction described below.

First Line Shows: Bank—Branch—Teller, Process Date (Effective Date), Transaction Code

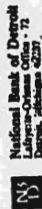
DEM.SCL A

032-006-05 10/24/86 () 12-00
DUH 86102-34 95,136.67 DE 0810

Second Line Shows: Account Type, Account Number, Amount, Transaction Type, Sequence No.

NBD 1771, 10 Rev. 8/85 (Code Definitions on Reverse Side)

0720003250



National Bank of Detroit
Lafayette-Orleans Office - 72
Detroit, Michigan 48226

MICHIGAN DEMOCRATIC
STATE CENTRAL COMMITTEE

86102-34
HARTZ
WELLS
HOLCE
INTERIOR, 111
JAN. 1987, FUND
CIC
AFICIO
407 52
4500 00
1914 15
7500 00
13500 00

95136 67
28/001342
29 86

DEPOSIT FOR ACCOUNT OF

ACCOUNT NO.

2104032735

CASH RECEIPTS JOURNAL

DATE	NET PAYMENT	DATE	NAME	BALANCE	DESCRIPTION	CONTR. BUTTONS	500 CLUB	CENTURY FUND	MEMBER SHIPS	ART. JACK TICKETS	4000-JACK JACK	PRESIDENTS CLUB	SPECIAL EVENTS	EMERGENCY	MEMO
15 30	15 00	10/16	BATES CONTRIBUTIONS	15 00	MISC. CONTR	F	15 00								
40732	407 52	10/16	WILSON STATE CONTR. EMER	126 27	5000-400	1									40732
45000	450 00	10/16	COMMITTEE FOR THE	450 00	CONTR	2									
			FUTURE OF MICHIGAN			3									
171415	1714 15	10/16	ASSOCIATION VICTORY FUND	2118 20	CONTR	4	1714 15								
135000	13500 00	10/16	WILSON STATE CONTR. EMER	13500 00	CONTR	5									
750000	75000 00	10/16	WILSON STATE CONTR. EMER	132100 00	CONTR	6									750000
			10/16 CAMPUS N '82			7									
						8									
						9									
						10									
						11									
						12									
						13									
						14									
						15									
						16									
						17									
						18									
						19									
						20									
						21									
						22									
						23									
						24									
						25									
						26									
						27									
						28									
						29									
						30									
						T	1729 15								

PAGE NO.
 DATE
 10/16/82

CASH PROOF ON HAND START OF DAY
 ALL CHECKS + AND CASH REC'D
 BANK DEPOSIT
 ON HAND = END OF DAY

SUB TOTALS
 CHECKS ONLY 95136.47
 TOTALS
 THIS SHEET ONLY
 GRAND TOTAL 95136.47
 FOR 1 SHEETS "H"
 DATE 29 OCTOBER 1982

21040332786



914003046

BRANCH 072

MICHIGAN DEMOCRATIC STATE
CENTRAL COMMITTEE
606 TOWNSEND
LANSING MI

48933

ACCOUNT NUMBER: 0086102-34

CHECKING ACCOUNT SUMMARY THROUGH 10/31/86

PREVIOUS BALANCE AS OF 09/30/86 350,872.50
+ 34 DEPOSITS AND OTHER CREDITS 1,097,108.68
- 963 CHECKS 612,106.25
- 25 OTHER DEBITS 428,290.06
- SERVICE CHARGE .00
CURRENT BALANCE AS OF 10/31/86 407,584.87

DAILY BALANCE SUMMARY

DATE	CREDITS	DEBIT	BALANCE	DATE	CREDITS	DEBITS	BALANCE
9-30				10-17	136,502.00	43,328.65	452,659.17
10-01	480.00	12,042.51	350,872.50	10-20	69,578.64	148,441.04	353,796.75
10-02	.00	2,326.02	336,963.97	10-21	23,258.00	25,362.44	351,692.11
10-03	64,697.68	10,929.34	390,732.29	10-22	25,536.75	50,810.83	352,405.04
10-06	19,474.16	89,317.87	320,888.60	10-23	50,022.50	23,405.04	352,835.86
10-07	90,470.00	17,861.98	393,496.62	10-24	56,452.05	40,515.70	348,771.90
10-08	4,907.00	4,904.92	393,498.70	10-27	.00	97,170.16	271,601.76
10-09	39,479.00	30,797.40	402,380.30	10-28	38,272.67	56,200.36	253,674.07
10-10	40,880.95	147,728.00	315,533.25	10-29	181,965.67	43,766.00	391,875.74
10-14	376.00	16,312.06	297,897.19	10-30	73,357.00	54,668.50	410,344.16
10-15	111,904.80	64,827.84	344,674.13	10-31	26,251.59	29,030.88	407,584.87
10-16	23,042.12	8,230.45	359,485.80				

	CHECKS	CASH	NET PAYMENT	DATE	NAME	BALANCE	DESCRIPTION	CONTRIBUTIONS	400 CLUB	CENTURY FUND	MEMBER SHARES	JEFF JACK FORETS	JEFF JACK RUB	PRESIDENT'S CLUB	SPECIAL EVENTS	DUPLICATE
F	150 00		150 00	10/1/66	NANCY SHELDON	150 00	F	150 00								
1	500 00		500 00	10/1/66	ROBERT J BAKER	500 00	1		500 00							
2	5000 00		5000 00	10/1/66	DELTA COUNTY DEM. CMTE	5000 00	2			5000 00						
3	1250 00		1250 00	10/1/66	WILLIAM MCCORMICK	1250 00	3					1250 00				
4	1250 00		1250 00	10/1/66	AZIZ ABRAHAM	1250 00	4					1250 00				
5	1250 00		1250 00	10/1/66	SHERYL RIGGS	1250 00	5					1250 00				
6	1700 00		1700 00	10/1/66	J. J. STONE	1700 00	6					1700 00				
7	2300 00		2300 00	10/1/66	DANIEL HANIGMAN	2300 00	7					2300 00				
8	1700 00		1700 00	10/1/66	MICHAEL BIBER	1700 00	8					1700 00				
9	3000 00		3000 00	10/1/66	IBEW ED CMTE	3000 00	9						3000 00			
10	100 00		100 00	10/1/66	MARVIN HEIDENRICH	100 00	10						100 00			
11	250 00		250 00	10/1/66	KRAHOL COMMITTEE	250 00	11						250 00			
12	100 00		100 00	10/1/66	DANIEL HARRELL	100 00	12						100 00			
13	100 00		100 00	10/1/66	ROBIN WIDGERY	100 00	13						100 00			
14	100 00		100 00	10/1/66	TERESA CONNOLLY	100 00	14						100 00			
15	100 00		100 00	10/1/66	L. JOHN NOWAK	100 00	15						100 00			
16	100 00		100 00	10/1/66	AUGUST HILL	100 00	16						100 00			
17	100 00		100 00	10/1/66	CLIFFORD HART	100 00	17						100 00			
18	100 00		100 00	10/1/66	A. PAULINE DORN	100 00	18						100 00			
19	100 00		100 00	10/1/66	JAMES CALLOW	100 00	19								100 00	
20	150 00		150 00	10/1/66	MARYBETH SCHUCHT	150 00	20								150 00	
21	150 00		150 00	10/1/66	CHARLES MOSES	150 00	21								150 00	
22	1000 00		1000 00	10/1/66	CHRYSLER FOR SUPP. CMTE	1000 00	22									1000 00
23	300 00		300 00	10/1/66	TROOPERS P.A.C.	300 00	23							300 00		
24	400 00		400 00	10/1/66	ROBERT HANRUEGER	400 00	24							400 00		
25	400 00		400 00	10/1/66	STATE POLICE COMMAND	400 00	25							400 00		
26	396 00		396 00	10/1/66	PREFITTERS P.A.C.	396 00	26							396 00		
27	594 00		594 00	10/1/66	RICHARD KELLEY	594 00	27							594 00		
28	990 00		990 00	10/1/66	D.A.B. P.A.C.	990 00	28							990 00		
29	100 00		100 00	10/1/66	GERALD HUGH	100 00	29							100 00		
30							30									
T	23730 00						T	(150 00)	(500 00)	(5000 00)		(9450 00)	(4050 00)	300 00	(400 00)	(1000 00)

	CHECKS	CASH	NET PAYMENT	DATE	NAME	BALANCE	DESCRIPTION	CONTR- BUTIONS	400 CLUB	CENTURY FUND	MEMBER SAMP	JEFF-JACK HOBBS	JEFF-JACK ADS	PRESIDENT'S COP	SPECIAL CASH	OTHER
F	100 00		100 00	1/29/66	R. T. DAVIS	100 00		F						100 00		
1	100 00		100 00	1/29/66	DOLLETTA WEATHERSPOON	100 00		1						100 00		
2	100 00		100 00	1/29/66	DOLLETTA WEATHERSPOON	100 00		2						100 00		
3	198 00		198 00	1/29/66	JOHN NEAL	198 00		3						198 00		
4	198 00		198 00	1/29/66	ILNE MOSES	198 00		4						198 00		
5	198 00		198 00	1/29/66	ALICE BURNES	198 00		5						198 00		
6	198 00		198 00	1/29/66	CLIFFORD ALDO	198 00		6						198 00		
7	198 00		198 00	1/29/66	PATRICIA VARGO	198 00		7						198 00		
8	198 00		198 00	1/29/66	BETTY JEAN AUREY	198 00		8						198 00		
9	198 00		198 00	1/29/66	MARIAG. ALEARD	198 00		9						198 00		
10	297 00		297 00	1/29/66	CAROLYN LAVOY	297 00		10						297 00		
11	99 00		99 00	1/29/66	JULIA WILES	99 00		11						99 00		
12	99 00		99 00	1/29/66	THOMAS SCOTT	99 00		12						99 00		
13	99 00		99 00	1/29/66	ALAN KALTER	99 00		13						99 00		
14	99 00		99 00	1/29/66	STEPHEN KAGATTUTA	99 00		14						99 00		
15	99 00		99 00	1/29/66	DEAN FRIEDMAN	99 00		15						99 00		
16	99 00		99 00	1/29/66	MICHAEL SHAPIRA	99 00		16						99 00		
17	99 00		99 00	1/29/66	H. BARRY LEVINE	99 00		17						99 00		
18	99 00		99 00	1/29/66	JOHN CONSIDINE	99 00		18						99 00		
19	99 00		99 00	1/29/66	STALEY BURKOFF	99 00		19						99 00		
20	99 00		99 00	1/29/66	JUDITH BERNE	99 00		20						99 00		
21	99 00		99 00	1/29/66	IRENE BASSO	99 00		21						99 00		
22	99 00		99 00	1/29/66	DENISE MOSES	99 00		22						99 00		
23	99 00		99 00	1/29/66	A. TAKAHASHI	99 00		23						99 00		
24	99 00		99 00	1/29/66	KATHLEEN HENNIGHAN	99 00		24						99 00		
25	99 00		99 00	1/29/66	LARRY GOOD	99 00		25						99 00		
26	99 00		99 00	1/29/66	JOHN H. SMITH	99 00		26						99 00		
27	100 00		100 00	1/29/66	WALTER NORTH	100 00		27						100 00		
28								28								
29								29								
30								30								
T	3667 00							T	150 00	500 00	500 00	9450 00	4050 00	6847 00	400 00	1000 00

1040332720

CAMPAIGN '86
ON TOP REG

CASH RECEIPTS JOURNAL

D P S V W

	CHECKS	CASH	NET PAYMENT	DATE	NAME	BALANCE	DESCRIPTION	CONTRIB- UTIONS	500 CLUB	CENTURY FUND	MEMBER SHOPS	JEFF JACK TICKETS	JEFF JACK KIDS	PRESIDENT'S CLUB	SPECIAL EVENTS	OTHER	TRANS- FERRALS
F	198 00		198 00	12/16	JOHN MOGK	198 00	F			198 00							
1	198 00		198 00	12/16	LEE GATES	198 00	1			198 00							
2	198 00		198 00	12/16	MI OPTOMETRIC PAC	198 00	2			198 00							
3	198 00		198 00	12/16	PATRICK CASLY	198 00	3			198 00							
4	198 00		198 00	12/16	JOHN LAFATA	198 00	4			198 00							
5	198 00		198 00	12/16	MI VOCATIONAL PAC	198 00	5			198 00							
6	198 00		198 00	12/16	RICHARD STEINBERG	198 00	6			198 00							
7	200 00		200 00	12/16	JOHN DEWANE	200 00	7			200 00							
8	200 00		200 00	12/16	EVERETT SIMMONS	200 00	8			200 00							
	200 00		200 00	12/16	ELIZABETH SCHWARTZ	200 00	9			200 00							
10	200 00		200 00	12/16	KEC FED OF TEACHERS PAC	200 00	10			200 00							
11	396 00		396 00	12/16	MI WASTE INDUSTRY PAC	396 00	11			396 00							
12	396 00		396 00	12/16	GERALD NAFTALY	396 00	12			396 00							
13	50 00		50 00	12/16	CECELIA MOBLEY	50 00	13			50 00							
14	1000 00		1000 00	12/16	HERBERT BLOOM	1000 00	14				1000 00						
15	200 00		200 00	12/16	MARY ANN GARLAK	200 00	15				200 00						
16	1000 00		1000 00	12/16	DWIGHT CARLSON	1000 00	16				1000 00						
17	1000 00		1000 00	12/16	HAROLD RUPP	1000 00	17				1000 00						
18	100 00		100 00	12/16	NORMAN PARKER	100 00	18					100 00					
19	100 00		100 00	12/16	JOHN HUMPHREYS	100 00	19					100 00					
20	100 00		100 00	12/16	ROBERT VRAIN	100 00	20					100 00					
21	100 00		100 00	12/16	MICHAEL BOISVENU	100 00	21					100 00					
22	100 00		100 00	12/16	OLIVER LAW	100 00	22					100 00					
23							23										
24							24										
25							25										
26							26										
27							27										
28							28										
29							29										
30							30										
T	6728 00		6728 00				T	5000 00	2500 00	6745 49	3200 00	500 00					

12145.49

21040337201

D

F

N

P

Q

S

T

1

	CHECKS	CASH	NET PAYMENT	DATE	NAME	BALANCE	DESCRIPTION		CONTRIBUTIONS	100 CLUB	CENTURY FUND	MEMBER SHIPS	JEFF JACK TICKETS	JEFF JACK ADS	PRESIDENT'S CLUB	SPECIAL EVENTS	BOOK
F	5000.00		5000.00	10/27/80	B.F.W. - POPE	5000.00	C	F	5000.00								
1	1000.00		1000.00	10/27/80	S.E.I.U. (COPF-MI. STATE CN)	1000.00	C	1	1000.00								
2	1000.00		1000.00	10/27/80	RICHARD W. STUART	1000.00	D	2		1000.00							
3	1000.00		1000.00	10/27/80	JOHN E. WATERMAN	1000.00	D	3		1000.00							
4	1000.00		1000.00	10/27/80	RICHARD F. KEZER	1000.00	D	4		1000.00							
5	1000.00		1000.00	10/27/80	KEITH E. GLISCH	1000.00	D	5		1000.00							
6	1000.00		1000.00	10/27/80	DENIS V. CURTIN	1000.00	D	6		1000.00							
7	1000.00		1000.00	10/27/80	PETER W. BRUNTON	1000.00	D	7		1000.00							
8	1000.00		1000.00	10/27/80	MILKEY WOHL	1000.00	D	8		1000.00							
9	1000.00		1000.00	10/27/80	JOHN W. YOUNG	1000.00	D	9		1000.00							
10	1000.00		1000.00	10/27/80	MICHELE L. SMITH	1000.00	D	10		1000.00							
11	1000.00		1000.00	10/27/80	JOHN W. WETZLER	1000.00	D	11		1000.00							
12	1000.00		1000.00	10/27/80	JONATHAN PLUTZNIK	1000.00	D	12		1000.00							
13	1000.00		1000.00	10/27/80	GEORGE B. WEIKSNIE	1000.00	D	13		1000.00							
14	1000.00		1000.00	10/27/80	STEPHEN V. MURPHY	1000.00	D	14		1000.00							
15	1000.00		1000.00	10/27/80	MICHAEL CIRASILLA	1000.00	D	15		1000.00							
16	1000.00		1000.00	10/27/80	MICHAEL SKENEKE	1000.00	D	16		1000.00							
17	500.00		500.00	10/27/80	CRAIG W. HENDERSON	500.00	D	17		500.00							
18	500.00		500.00	10/27/80	JAMES T. SCANLON	500.00	D	18		500.00							
19	100.00		100.00	10/27/80	CORNELIUS THORNTON	100.00	D	19		100.00							
20	100.00		100.00	10/27/80	DANIEL J. MEADE	100.00	D	20		100.00							
21	100.00		100.00	10/27/80	GRANIE LINGERWOOD FIK-	100.00	D	21		100.00							
22	100.00		100.00	10/27/80	CHARLES J. GATES	100.00	D	22		100.00							
23	100.00		100.00	10/27/80	JOHN M. GERAGHTY	100.00	D	23		100.00							
24	25.00		25.00	10/27/80	WILLIAM M. WIGDER	25.00	D	24		25.00							
25	60.00		60.00	10/27/80	CHARLES J. GATES	60.00	D	25		60.00							
26	4000.00		4000.00	10/27/80	4th 3rd DIST DEM CLITE	4000.00	F	26		4000.00							
27	1000.00		1000.00	10/27/80	3rd DIST DEM CLITE	1000.00	F	27		1000.00							
28	100.00		100.00	10/27/80	NBD 1000 CITIZENSHIP CLITE	100.00	N	28				100.00					
29	100.00		100.00	10/27/80	MANUFACTURERS BANK PAID	100.00	N	29				100.00					
30								30									
T	31,785.00							T	(15000.00)	(16585.00)	(5000.00)	(200.00)					

91040332792

CAMPAIGN '86

CASH RECEIPTS JOURNAL

NO ON TOP PEG

	C	D	F	N	P	Q	S	T	V
	COUNTRY	CLUB	CENTURY	MEMBER	JEFF	JEFF	PRESIDENT	SPECIAL	OTHER
	EDITIONS	CLUB	FUND	SHOPS	JEFF	JEFF	CLUB	EXHIBIT	CLUB
F	100 00			100 00	%1/2	ROBERT JAY	100 00		
1	200 00			200 00	%1/4	LEONARD KOLON	200 00		
2	100 00			100 00	%1/2	WALTER STASKOWSKI	100 00		
3	100 00			100 00	%1/4	MNC-PAC	100 00		
4	100 00			100 00	%1/4	MIRA BEMIS	100 00		
5	50 00			50 00	%1/4	WILLIAM TAYLOR	50 00		
6	250 00			250 00	%1/4	JERRY BAZINSKI	250 00		
7	100 00			100 00	%1/4	ROBERT BENDZINSKI	100 00		
8	100 00			100 00	%1/4	HENRY KOZAK	100 00		
9	350 00			350 00	%1/4	LEONARD KROLIK	350 00		
10	100 00			100 00	%1/4	CMTF FOR WOJCIOWICZ	100 00		
11	500 00			500 00	%1/4	PETRIT BUDKA	500 00		
12	50 00			50 00	%1/4	ANNETTE SZCZEPANIK	50 00		
13	100 00			100 00	%1/4	WANDA REJ	100 00		
14	50 00			50 00	%1/4	THERESA ARICK	50 00		
15	50 00			50 00	%1/4	RICHARD SMOGER	50 00		
16	100 00			100 00	%1/4	JOHN R. AYE	100 00		
17	1700 00			1700 00	%1/4	LIAISON NELSON	1700 00		
18	1250 00			1250 00	%1/4	FRANCIS CRONES	1250 00		
19	1700 00			1700 00	%1/4	IRENE GREGG	1700 00		
20	1000 00			1000 00	%1/4	RICHARD GOODYEAR	1000 00		
21	1250 00			1250 00	%1/4	CONS AWCAMP FOR B. P. R.	1250 00		
22	1250 00			1250 00	%1/4	REBECCA BERNAT	1250 00		
23	1700 00			1700 00	%1/4	R.C. HERBERT	1700 00		
24	100 00			100 00	%1/4	JANE FORGES	100 00		
25	100 00			100 00	%1/4	ROBERT GORLIN	100 00		
26	100 00			100 00	%1/4	STEPHEN GUITTARD	100 00		
27	100 00			100 00	%1/4	JOEL KRISOFF	100 00		
28	100 00			100 00	%1/4	LAMBERT O'LEARY JR	100 00		
29	100 00			100 00	%1/4	STEPHEN TURNER	100 00		
30									
T	12850 00			12850 00			(2400 00/10450 00)		

040332793

CASH RECEIPTS JOURNAL

CAMPAIGN '86

3
D ON TOP PEG
4

C D F N P Q S T V

	CHECKS	CASH	NET PAYMENT	DATE	NAME	BALANCE	DESCRIPTION		CENTRAL BILLIONS	400 CLUB	CENTURY FUND	MEMBER SHIPS	JEFF JACK TICKETS	JEFF JACK ADS	PRESIDENTS CLUB	SPECIAL EVENTS	UNDO	THO-ELLAMER
F	100.00		100.00	10/21/86	GEORGE BASARRA JR	100.00		F					100.00					
1	100.00		100.00	10/21/86	BRIAN SULLIVAN	100.00		1					100.00					
2	100.00		100.00	10/21/86	TIMOTHY FUSCO	100.00		2					100.00					
3	50.00		50.00	10/21/86	KAY FELT	50.00		3					50.00					
4	100.00		100.00	10/21/86	BETTYE ELKINS	100.00		4					100.00					
5	100.00		100.00	10/21/86	PATRICIA LAZZIO	100.00		5						100.00				
6	100.00		100.00	10/21/86	MICHAEL PELAVIN	100.00		6						100.00				
7	100.00		100.00	10/21/86	STEPHEN LAZZIO	100.00		7						100.00				
8	200.00		200.00	10/21/86	JAMES ZIMMER	200.00		8						200.00				
9	500.00		500.00	10/21/86	WILLIAM MONLOCH	500.00		9						500.00				
10	100.00		100.00	10/21/86	IAN MONLOCH	100.00		10						100.00				
11	100.00		100.00	10/21/86	FLINT BLOTTED PAC	100.00		11						100.00				
12	100.00		100.00	10/21/86	JOE CONROY	100.00		12						100.00				
13	100.00		100.00	10/21/86	CLINTON JONES	100.00		13						100.00				
14	100.00		100.00	10/21/86	ALLEN NELSON	100.00		14						100.00				
15	100.00		100.00	10/21/86	RICHARD YUILLE	100.00		15						100.00				
16	100.00		100.00	10/21/86	NATHAN SCHAFER	100.00		16						100.00				
17	200.00		200.00	10/21/86	WALEY CHAPMAN	200.00		17						200.00				
18	100.00		100.00	10/21/86	BRUCE NEWARTH	100.00		18						100.00				
19	100.00		100.00	10/21/86	ROBERT YUILLE	100.00		19						100.00				
20	100.00		100.00	10/21/86	SANDRA APPELGATE	100.00		20						100.00				
21	100.00		100.00	10/21/86	CLETT O.E.F	100.00		21						100.00				
22	100.00		100.00	10/21/86	PETER MARROSO	100.00		22						100.00				
23	100.00		100.00	10/21/86	DARLENE SHEEHAN	100.00		23						100.00				
24	100.00		100.00	10/21/86	RICHARD RUHALA	100.00		24						100.00				
25	200.00		200.00	10/21/86	LARRY STECCO	200.00		25						200.00				
26	100.00		100.00	10/21/86	MICHAEL BROWN	100.00		26						100.00				
27	100.00		100.00	10/21/86	ROBERT ACREV	100.00		27						100.00				
28	100.00		100.00	10/21/86	VALDEMER WASHINGTON	100.00		28						100.00				
29	200.00		200.00	10/21/86	JACK BOEHM	200.00		29						200.00				
30								30										
T	3750.00		3750.00					T					1450.00	3300.00				

91040332794

CAMPAIGN '86

CASH RECEIPTS JOURNAL

10 ON TOP REG

C D F N P Q S T V

	CHECKS	CASH	NET PAYMENT	DATE	NAME	BALANCE	DESCRIPTION		CONTR BILLIONS	400 CLUB	CENTURY FUND	MEMBER SHOPS	JETT-JACK TICKETS	JETT-JACK RDS	PRESIDENTS CLUB	SPECIAL EVENTS	SMOKE	TRIP- ELLAMER
F	200 00		200 00	2/1/86	DONALD PECKHAM	200 00		F						200 00				
1	100 00		100 00	2/1/86	LUKE QUINN	100 00		1						100 00				
2	500 00		500 00	2/1/86	GENE HEGGERTY	500 00		2						500 00				
3	100 00		100 00	2/1/86	MICHAEL J. CARR	100 00		3						100 00				
4	100 00		100 00	2/1/86	JACK SCHAEFFER	100 00		4						100 00				
5	100 00		100 00	2/1/86	ROBERT CRAIG	100 00		5						100 00				
6	400 00		400 00	2/1/86	KENDALL WILLIAMS	400 00		6						400 00				
7	200 00		200 00	2/1/86	DAVID LEYTON	200 00		7						200 00				
8	100 00		100 00	2/1/86	TED HANSOUR	100 00		8						100 00				
9	200 00		200 00	2/1/86	ALFRED COOK	200 00		9						200 00				
10	100 00		100 00	2/1/86	MURRAY E MOSS	100 00		10						100 00				
11	400 00		400 00	2/1/86	FLINT TWP BEE CAFE	400 00		11						400 00				
12	500 00		500 00	2/1/86	CAMERON DEAN	500 00		12						500 00				
13	100 00		100 00	2/1/86	THOMAS DONNELLAN	100 00		13						100 00				
14	100 00		100 00	2/1/86	DOUGLAS WEILAND	100 00		14						100 00				
15	100 00		100 00	2/1/86	BRADY SMITH, JR	100 00		15						100 00				
16	200 00		200 00	2/1/86	JAMES HOBSON	200 00		16						200 00				
17	100 00		100 00	2/1/86	DAVID MALMO	100 00		17						100 00				
18	400 00		400 00	2/1/86	EDUCATORS P.A.C	400 00		18						400 00				
19	200 00		200 00	2/1/86	EVELYN TWIG	200 00		19						200 00				
20	200 00		200 00	2/1/86	GAIL JOHNSON	200 00		20						200 00				
21	100 00		100 00	2/1/86	FRUMETH HIRSCH	100 00		21						100 00				
22	100 00		100 00	2/1/86	ROBERT IRWIN	100 00		22						100 00				
23	100 00		100 00	2/1/86	C.N. GIBSON	100 00		23						100 00				
24	100 00		100 00	2/1/86	MARLENE YATES	100 00		24						100 00				
25	100 00		100 00	2/1/86	DAVID UPMEYER	100 00		25						100 00				
26	100 00		100 00	2/1/86	WEISS O.E.F	100 00		26						100 00				
27	100 00		100 00	2/1/86	FRANK MANLEY III	100 00		27						100 00				
28	100 00		100 00	2/1/86	S OLOF KARLSTROM	100 00		28						100 00				
29	100 00		100 00	2/1/86	OLIVIA MAYNARD	100 00		29						100 00				
30								30										
T	5300 00							T						(5300 00)				

91040332795

CAMPAIGN '86

CASH RECEIPTS JOURNAL

ON TOP PEG

C D F N P Q S T V

	CHECKS	CASH	NET PAYMENT	DATE	NAME	BALANCE	DESCRIPTION		CENTRE BILLIONS	400 CLUB	CENTURY FUNDS	MEMBER SHIP	JEFF - JIM DONORS	JEFF - JIM RUS	PRESIDENTS CLUB	SPECIAL EVENTS	DRUGS	TRAVEL
F	200.00		200.00	6/29/86	CONG. KILDEE CATEL	200.00		F						200.00				
1	100.00		100.00	6/29/86	P. FRANCES HARRING	100.00		1						100.00				
2	200.00		200.00	6/29/86	HAROLD L. MALLON	200.00		2						200.00				
3	100.00		100.00	6/29/86	MELVIN FLAMENBAUM	100.00		3						100.00				
4	100.00		100.00	6/29/86	LOUIS KASLE	100.00		4						100.00				
5	200.00		200.00	6/29/86	HILTON SIEGEL	200.00		5						200.00				
6	1000.00		1000.00	6/29/86	RAYMOND WELIGEL	1000.00		6							1000.00			
7	198.00		198.00	6/29/86	KAROL FOSS	198.00		7							198.00			
8	99.00		99.00	6/29/86	CLAUDE YOUNG	99.00		8							99.00			
9	198.00		198.00	6/29/86	ROBERT DOMBROWSKI	198.00		9							198.00			
10	99.00		99.00	6/29/86	RICHARD MCKNIGHT	99.00		10							99.00			
11	99.00		99.00	6/29/86	GAIL MCKNIGHT	99.00		11							99.00			
12	99.00		99.00	6/29/86	DONNA OTTENSMA	99.00		12							99.00			
13	500.00		500.00	6/29/86	INSURANCE PAC	500.00		13							500.00			
14	100.00		100.00	6/29/86	JOA PENZIEN	100.00		14							100.00			
15	100.00		100.00	6/29/86	MICHAEL SCHMEIDEN	100.00		15							100.00			
16	100.00		100.00	6/29/86	KAREN SCHNEIDER	100.00		16							100.00			
17	100.00		100.00	6/29/86	LAWRENCE SCHNEIDER	100.00		17							100.00			
18	100.00		100.00	6/29/86	JUDITH SCHMEIDEN	100.00		18							100.00			
19	99.00		99.00	6/29/86	PAT J. DYSON	99.00		19							99.00			
20	100.00		100.00	6/29/86	JANIES WHITE	100.00		20							100.00			
21	100.00		100.00	6/29/86	WILLIAM BISKAMP	100.00		21							100.00			
22	100.00		100.00	6/29/86	BARBARA COBY	100.00		22							100.00			
23	100.00		100.00	6/29/86	HEZUR PRZYBYLOWICZ	100.00		23							100.00			
24	50.00		50.00	6/29/86	SIST STOREY	50.00		24							50.00			
25	200.00		200.00	6/29/86	STEPHEN SCHULTZ	200.00		25							200.00			
26	100.00		100.00	6/29/86	CAROLYN PRZYBYLOWICZ	100.00		26							100.00			
27	100.00		100.00	6/29/86	KAREN BECKMAN	100.00		27							100.00			
28	297.00		297.00	6/29/86	SIC PAC	297.00		28							297.00			
29	50.00		50.00	6/29/86	TONY GORCH	50.00		29							50.00			
30								30										
T	4988.00							T						(1900.00)	(4088.00)			

91040332726

CAMPAIGN '86

CASH RECEIPTS JOURNAL

D ON TOP PEG

C D F N P Q S T V

	CHECKS	CASH	NET PAYMENT	DATE	NAME	BALANCE	DESCRIPTION		CONTRIB- UTIONS	500 CLUB	CENTURY FUNDS	MEMBER SAVES	JETT-JACK THOMAS	JETT-JACK RDS	PRESIDENT'S CLUB	SPECIAL EVENTS	DRUGS	WIS- ELLABON
F	50.00		50.00	7/1/86	JOHN ECKOFF	50.00		F							50.00			
1	50.00		50.00	7/1/86	A.W. HARVEY	50.00		1							50.00			
2	99.00		99.00	7/1/86	DONALD GAMACHE	99.00		2							99.00			
3	99.00		99.00	7/1/86	DAN BAKER	99.00		3							99.00			
4	99.00		99.00	7/1/86	DONALD JENNINGS	99.00		4							99.00			
5	99.00		99.00	7/1/86	JOHN DEVRIES	99.00		5							99.00			
6	99.00		99.00	7/1/86	SILVESTER FLARITY	99.00		6							99.00			
7	99.00		99.00	7/1/86	ABBA SHAPIRO	99.00		7							99.00			
8	99.00		99.00	7/1/86	MARY ELLYN PARROTT	99.00		8							99.00			
9	99.00		99.00	7/1/86	RUTH EBERLE	99.00		9							99.00			
10	99.00		99.00	7/1/86	JAMES AMAR	99.00		10							99.00			
11	99.00		99.00	7/1/86	WILLIAM BROUILLETTE	99.00		11							99.00			
12	99.00		99.00	7/1/86	LARRY FACIONE	99.00		12							99.00			
13	99.00		99.00	7/1/86	CONNIE STEWART	99.00		13							99.00			
14	99.00		99.00	7/1/86	JOSEPH FARRELL	99.00		14							99.00			
15	99.00		99.00	7/1/86	WILLIAM BROODHEAD	99.00		15							99.00			
16	198.00		198.00	7/1/86	LOUIS WECHSLER	198.00		16							198.00			
17	198.00		198.00	7/1/86	JERRY RAYMOND	198.00		17							198.00			
18	198.00		198.00	7/1/86	F.I.N.R. PAC	198.00		18							198.00			
19	198.00		198.00	7/1/86	THOMAS CATALLO	198.00		19							198.00			
20	396.00		396.00	7/1/86	KENNETH J. MORRIS	396.00		20							396.00			
21	396.00		396.00	7/1/86	PAUL PROUBFOOT	396.00		21							396.00			
22	396.00		396.00	7/1/86	TRAI G. THOMAS	396.00		22							396.00			
23	100.00		100.00	7/1/86	FRANK PERRIN	100.00		23								100.00		
24	101.00		101.00	7/1/86	HEMACHANDRAN KRISANAN	101.00		24								101.00		
25	100.00		100.00	7/1/86	RICHARD DUNCO	100.00		25									100.00	
26	500.00		500.00	7/1/86	BARBARA MCKENZIE	500.00		26									500.00	
27	500.00		500.00	7/1/86	ROBERT VANDERMARK	500.00		27									500.00	
28	1000.00		1000.00	7/1/86	JANICE HAYHAW	1000.00		28									1000.00	
29	150.00		150.00	7/1/86	ELIZABETH HOWE			29									150.00	
30								30										
T	6517.00		6517.00					T							(3466.00)	(201.00)	(850.00)	

CAMPAIGN '86

CASH RECEIPTS JOURNAL

		C	D	F	N	P	Q	S	T	V										
		CHECKS	CASH	NET PAYMENT	DATE	NAME	BALANCE	DESCRIPTION		CONTRIBUTIONS	300 CLUB	CENTURY FUND	MEMBER SHIPS	JEFF JACK THEATERS	JEFF JACK RDS	PRESIDENTS CLUB	SPECIAL EVENTS	THRU	THRU ELLANEO	
F		300 00		300 00	7/1/86	KATHARIN SHAW	300 00	F											300 00	
1		500 00		500 00	7/1/86	SARON DOMMERITO	500 00	1											500 00	
2		500 00		500 00	7/1/86	WILLIAM LEBOLD	500 00	2											500 00	
3		400 00		400 00	7/1/86	LARRY TOKARSKI	400 00	3											400 00	
4		500 00		500 00	7/1/86	J. PHILLIP JOURDAN	500 00	4											500 00	
5		50 00		50 00	7/1/86	RONALD THAYER	50 00	5											50 00	
6		500 00		500 00	7/1/86	STEPHEN WEISS	500 00	6											500 00	
7		1000 00		1000 00	7/1/86	EDWARD HAVLIK	1000 00	7											1000 00	
8		50 00		50 00	7/1/86	GREGORY MORRIS	50 00	8											50 00	
9		1000 00		1000 00	7/1/86	RONALD CHARFOOS	1000 00	9											1000 00	
10		500 00		500 00	7/1/86	SAMUEL TURNER	500 00	10											500 00	
11		1000 00		1000 00	7/1/86	G. M. CARR	1000 00	11											1000 00	
12		1000 00		1000 00	7/1/86	LEO T. EGAN	1000 00	12											1000 00	
13		1000 00		1000 00	7/1/86	DONALD BONNER	1000 00	13											1000 00	
14		500 00		500 00	7/1/86	STEPHEN MONSMA	500 00	14											500 00	
15		1000 00		1000 00	7/1/86	HEALTH+PEOPLE P.A.C.	1000 00	15											1000 00	
16		1000 00		1000 00	7/1/86	GARY VANEK	1000 00	16											1000 00	
17		1000 00		1000 00	7/1/86	JOSEPH T. SMITH, JR.	1000 00	17											1000 00	
18		500 00		500 00	7/1/86	JOHN ROY CASTILLO	500 00	18											500 00	
19		500 00		500 00	7/1/86	LEONARD PROCTOR	500 00	19											500 00	
20		500 00		500 00	7/1/86	VERNON ANDREWS	500 00	20											500 00	
21		1000 00		1000 00	7/1/86	GEORGE GOOGASIAN	1000 00	21											1000 00	
22		1000 00		1000 00	7/1/86	MICABLE TV ASSN PAC	1000 00	22											1000 00	
23		1000 00		1000 00	7/1/86	RICHARD BARCH	1000 00	23											1000 00	
24		500 00		500 00	7/1/86	FAYLENE CURTIS	500 00	24											500 00	
25		1495 00		1495 00	7/1/86	ARTHUR DURIN	1495 00	25											1495 00	
26		500 00		500 00	7/1/86	S.C. FEDERWA	500 00	26											500 00	
27		500 00		500 00	7/1/86	DONALD WETHERSPON	500 00	27											500 00	
28		500 00		500 00	7/1/86	PATIENCE DRAKE	500 00	28											500 00	
29		1000 00		1000 00	7/1/86	MI MERCHANTS PAC	1000 00	29											1000 00	
30								30												
T		20195 00						T											20195 00	

McBee® MODEL 100 11/84

(PAGE NO. 051)

91040832797

CAMPAIGN '86

CASH RECEIPTS JOURNAL

C D F N P Q S T V																		
	CHECKS	CASH	NET PAYMENTS	DATE	NAME	BALANCE	DESCRIPTION		CONTRIBUTIONS	BOB CLUB	CENTURY FUND	MEMBER SHIPS	JET JACK HERETS	JET JACK ROS	PRESIDENTS CLUB	SPECIAL EVENTS	BRASS	WIFE-ELLANOR
F	1000 00		1000 00	7/28	Food PAC OF MI	1000 00		F									1000 00	
1	500 00		500 00	7/28	WILL O.K. GRETENBERGER	500 00		1									500 00	
2	500 00		500 00	7/28	JILL PEANNGEDAI	500 00		2									500 00	
3	500 00		500 00	7/28	CAROLYN SPARKS	500 00		3									500 00	
4	500 00		500 00	7/28	C. PATRICK BARACK	500 00		4									500 00	
5	2500 00		2500 00	7/28	ALUMINUM PIPEFITTERS LOCAL 382 PAC	2500 00		5									2500 00	
6								6										
7								7										
8								8										
9								9										
10								10										
11								11										
12								12										
13								13										
14								14										
15								15										
16								16										
17								17										
18								18										
19								19										
20								20										
21								21										
22								22										
23								23										
24								24										
25								25										
26								26										
27								27										
28								28										
29								29										
30								30										
T	5500 00							T	15000 00	16585 00	5000 00	2600 00	10900 00	9500 00	7554 00	201 00	29145 00	(5500 00)

8 6 7 3 3 0 4 0 1 6

CH 100 100 100
LOAD ON TOP PEG 10/23/36 B

	CHECKS	CASH	NET PAYMENT	DATE	NAME	BALANCE	DESCRIPTION		CORTI BUTIONS	500 CLUB	CENTURY FUND	MEMBER SHIPS	JEFF JACK TICKETS	JEFF JACK ADS	PRESIDENT'S CLUB	SPECIAL EVENTS	BINGO
F	1250.00		1250.00	10/23/36	SEYMOUR PAC	1250.00	P	F	1250.00								
1	1250.00		1250.00	10/23/36	TERENCE - TACID WYLL	1250.00	P	1	1250.00								
2	4000.00		4000.00	10/23/36	LEONARD C. JARVES	4000.00	P	2	4000.00								
3	2000.00		2000.00	10/23/36	ROBERT E. NEDERLAND	2000.00	P	3	2000.00								
4	1250.00		1250.00	10/23/36	ANTHONY SCARF	1250.00	P	4	1250.00								
5	1250.00		1250.00	10/23/36	JOSEPH SPIESER	1250.00	P	5	1250.00								
6	1250.00		1250.00	10/23/36	PAUL & BEVERLY FELICE	1250.00	P	6	1250.00								
7	1250.00		1250.00	10/23/36	NATE SCHARRO	1250.00	P	7	1250.00								
8	4000.00		4000.00	10/23/36	DR. RICHARD GOLDFEN	4000.00	P	8	4000.00								
9			4000.00	10/23/36	GERALD L. YAX	4000.00	P	9	4000.00								
10	1250.00		1250.00	10/23/36	MARVIN C. BAITCH	1250.00	P	10	1250.00								
11	1250.00		1250.00	10/23/36	DONALD F. TUCKER	1250.00	P	11	1250.00								
12	1250.00		1250.00	10/23/36	WILLIAMS FOR DEUS	1250.00	P	12	1250.00								
13	300.00		300.00	10/23/36	DANIEL S. COLE	300.00	P T	13		300.00							
14	50.00		50.00	10/23/36	WALTER FINANI	50.00	P T	14		50.00							
15	1000.00		1000.00	10/23/36	MIKE VRIECAS	1000.00	V	15			1000.00						
16	100.00		100.00	10/23/36	PAUL C. LIPNISCHE	100.00	V	16			100.00						
17								17									
18								18									
19								19									
20								20									
21								21									
22								22									
23								23									
24								24									
25								25									
26								26									
27								27									
28								28									
29								29									
30								30									
T	2760.00							T	2760.00	350.00	200.00						

7100.00

CASH PROOF: ON HAND
START OF DAY

ALL CHECKS
+ AND CASH REC'D

BANK DEPOSIT

ON HAND
END OF DAY

PAGE NO.
DATE

66232799

10/22/80

	CHECKS	CASH	NET PAYMENT	DATE	NAME	BALANCE	DESCRIPTION	CONTRIBUTIONS	500 CLUB	CENTURY FUND	MEMBER SHIPS	JEFF JACK TICKETS	JEFF JACK ADS	PRESIDENTS CLUB	SPECIAL EVENTS
F	200.00		200.00	11/2/80	ROBERT L. ZOLKOWSKI	200.00	P	F	200.00						
1			50.00	1/3/81	WILLIAM J. PIERCE	150.00	P	1	250.00						
2			50.00	1/23/81	MINI-PARTISAN ALLIANCE	100.00	P	2	200.00						
3			50.00	1/23/81	DALE J. JAKUBSKI	50.00	P	3	1250.00						
4			1250.00	1/23/81	JOHN C. RUHIG	1250.00	P	4	1250.00						
5			1250.00	1/23/81	ERIE L. SCHWARTZ	1250.00	P	5	1250.00						
6			100.00	1/23/81	J. MIRON WAGEN	1150.00	V	6		100.00					
7			100.00	1/23/81	WILLIAM J. PIERCE	1050.00	V	7		100.00					
8			100.00	1/23/81	THOMAS R. ADAMS	950.00	V	8		200.00					
9								9							
10								10							
11								11							
12								12							
13								13							
14								14							
15								15							
16								16							
17								17							
18								18							
19								19							
20								20							
21								21							
22								22							
23								23							
24								24							
25								25							
26								26							
27								27							
28								28							
29								29							
30								30							
T			12250.00					T	10050.00	2200.00					

CASH PROOF: ON HAND
START OF DAYALL CHECKS
+ AND CASH REC'D

BANK DEPOSIT

ON HAND
END OF DAYPAGE NO.
DATE

008232800

LOAD ON TOP PEG 10/20/86

	CHECKS	CASH	NET PAYMENT	DATE	NAME	BALANCE	DESCRIPTION	CONTRIBUTIONS	500 CLUB	CENTURY SUMO	MEMBER SHIPS	JEFF JACK TICKETS	JEFF JACK ADS	PRESIDENT'S CLUB	SPECIAL EVENTS	I N
F	250.00		250.00	7/20/86	TRIPER LANSING LARSEN ✓	250.00	C		250.00							
1					SAUL - FERRIS ROPE SWIT											
2	40.00		40.00	7/20/86	TRIPER LANSING LARSEN ✓	40.00	C		40.00							
3	125.00		125.00	7/20/86	ROBERT BLIFORD ✓	125.00	P				1250.00					
4	99.00		99.00	7/20/86	MICHAEL K. BERNIN ✓	99.00	S			99.00						
5	20.00		20.00	7/20/86	ROBERT D. CHAFFIN ✓	20.00	S			20.00						
6	97.00		97.00	7/20/86	NANCY J. DRIFF ✓	97.00	S			97.00						
7	198.00		198.00	7/20/86	JOHN J. BARNETT ✓	198.00	S			198.00						
8	99.00		99.00	7/20/86	ANGELO GRILLO ✓	99.00	S			99.00						
9	99.00		99.00	7/20/86	JOHN J. BARNETT ✓	99.00	S			99.00						
10	198.00		198.00	7/20/86	JOHN J. BARNETT ✓	198.00	S			198.00						
11	99.00		99.00	7/20/86	JOHN J. BARNETT ✓	99.00	S			99.00						
12	99.00		99.00	7/20/86	JOHN J. BARNETT ✓	99.00	S			99.00						
13	100.00		100.00	7/20/86	JOHN J. BARNETT ✓	100.00	S			100.00						
14	99.00		99.00	7/20/86	JOHN J. BARNETT ✓	99.00	S			99.00						
15	99.00		99.00	7/20/86	JOHN J. BARNETT ✓	99.00	S			99.00						
16	198.00		198.00	7/20/86	JOHN J. BARNETT ✓	198.00	S			198.00						
17																
18																
19																
20																
21																
22																
23																
24																
25																
26																
27																
28																
29																
30																
T	5656.00								2920.00	1506.00	1250.00					

1 5656.00

CASH PROOF: ON HAND START OF DAY + ALL CHECKS + AND CASH REC'D - BANK DEPOSIT - ON HAND = END OF DAY

PAGE NO
DATE

10832804016

CAMPAIGN '86
DAD ON TOP PEG
10/17/86

	CHECKS	CASH	NET PAYMENT	DATE	NAME	BALANCE	DESCRIPTION		CONTRI- BUTIONS	600 CASH	CENTURY FUND	MEMBER SHARES	JEFF JACK TICKETS	JEFF JACK ADS	PRESIDENT'S CLUB	SPECIAL EVENTS	BIN
1	100.00		100.00	7/1/86	MICHAEL STARKER	100.00	?	F									
2	125.00		125.00	7/1/86	DET. AUTO DEALERS PAC	125.00	P	1		125.00							
3	125.00		125.00	7/1/86	MARION N. SPAN STATE	125.00	P	2		125.00							
4	400.00		400.00	7/1/86	LEE SWIFT RATT-N-UT	400.00	P	3		15.00							
5	178.00		178.00	7/1/86	DYRON ANGLILL	178.00	S	4			178.00						
6	198.00		198.00	7/1/86	PAUL S. ZANDER	198.00	S	5			198.00						
7	500.00		500.00	7/1/86	WILLIAM S. BUNKER	500.00	S	6			500.00						
8	110.00		110.00	7/1/86	DONALD C. BURNS	110.00	S	7			110.00						
9	110.00		110.00	7/1/86	ROBERT M. CURTIS	110.00	S	8			110.00						
10	110.00		110.00	7/1/86	EDWARD E. FAWCETT	110.00	S	9			110.00						
11	110.00		110.00	7/1/86	WILLIAM R. EVANS	110.00	S	10			110.00						
12	110.00		110.00	7/1/86	WILLIAM M. GORDON	110.00	S	11			110.00						
13	110.00		110.00	7/1/86	WILLIAM M. GREENBERG	110.00	S	12			110.00						
14	110.00		110.00	7/1/86	STEVEN M. KAPLAN	110.00	S	13			110.00						
15	110.00		110.00	7/1/86	WILLIAM E. KAPLAN	110.00	S	14			110.00						
16	110.00		110.00	7/1/86	WILLIAM E. KAPLAN	110.00	S	15			110.00						
17	110.00		110.00	7/1/86	WILLIAM E. KAPLAN	110.00	S	16			110.00						
18	110.00		110.00	7/1/86	WILLIAM E. KAPLAN	110.00	S	17			110.00						
19	110.00		110.00	7/1/86	WILLIAM E. KAPLAN	110.00	S	18			110.00						
20	110.00		110.00	7/1/86	WILLIAM E. KAPLAN	110.00	S	19			110.00						
21	110.00		110.00	7/1/86	WILLIAM E. KAPLAN	110.00	S	20			110.00						
22	110.00		110.00	7/1/86	WILLIAM E. KAPLAN	110.00	S	21			110.00						
23	110.00		110.00	7/1/86	WILLIAM E. KAPLAN	110.00	S	22			110.00						
24	110.00		110.00	7/1/86	WILLIAM E. KAPLAN	110.00	S	23			110.00						
25	110.00		110.00	7/1/86	WILLIAM E. KAPLAN	110.00	S	24			110.00						
26	110.00		110.00	7/1/86	WILLIAM E. KAPLAN	110.00	S	25			110.00						
27	110.00		110.00	7/1/86	WILLIAM E. KAPLAN	110.00	S	26			110.00						
28	110.00		110.00	7/1/86	WILLIAM E. KAPLAN	110.00	S	27			110.00						
29	110.00		110.00	7/1/86	WILLIAM E. KAPLAN	110.00	S	28			110.00						
30	110.00		110.00	7/1/86	WILLIAM E. KAPLAN	110.00	S	29			110.00						
T							T										

CASH PROOF: ON HAND
START OF DAY

ALL CHECKS
+ AND CASH REC'D

BANK DEPOSIT

ON HAND
END OF DAY

PAGE NO.
DATE

21040832302

10/23/66

A

10 F

G

H

I

N

R

S

	CHECKS	CASH	NET PAYMENT	DATE	NAME	BALANCE	DESCRIPTION		COUNTY BUDGETS	500 CLUB	CENTURY FUND	MEMBER SHIPS	JEFF-JACK TICKETS	JEFF-JACK ADS	PRESIDENT'S CLUB	SPECIAL EVENTS	BING
1	5000.00		5000.00	10/23/66	UNITED STEELWORKERS OF AMER. DIST. 27-PAC	5000.00	C	F	5000.00								
2	300.00		300.00	10/23/66	W. J. JACKSON - DOLLARITE	20.00	F	2	300.00								
3	100.00		100.00	10/23/66	W. J. JACKSON - DOLLARITE	100.00	G	3		100.00							
4	100.00		100.00	10/23/66	W. J. JACKSON - DOLLARITE	100.00	G	4		100.00							
5	100.00		100.00	10/23/66	VICTOR G. NEGRET	20.00	G	5		100.00							
6	100.00		100.00	10/23/66	STEVEN G. GORDON	100.00	G	6		100.00							
7	100.00		100.00	10/23/66	ELLEN H. GLEASER	100.00	K	7			1000.00						
8	ERROR							8			00						
9	200.00		200.00	10/23/66	DAN BOETNICK	200.00	L	9				2000.00					
10	500.00		500.00	10/23/66	ROBERT T. FINNERTY	500.00	L	10				500.00					
11	500.00		500.00	10/23/66	ERIK K. KELLY	500.00	L	11				500.00					
12	50.00		50.00	10/23/66	TOMY L. DIENA	50.00	L	12				50.00					
13	250.00		250.00	10/23/66	ANTHONY J. COSTING	250.00	L	13				250.00					
14	250.00		250.00	10/23/66	ANNE J. HILKOWSKI	250.00	N	14					250.00				
15	250.00		250.00	10/23/66	ETHEL K. HILKOWSKI	250.00	N	15					50.00				
16	100.00		100.00	10/23/66	W. J. JACKSON - DOLLARITE	100.00	N	16					100.00				
17	100.00		100.00	10/23/66	FRANCIS J. COOMES	100.00	P	17						1000.00			
18	750.00		750.00	10/23/66	JOSEPH M. JAMISON	750.00	P	18						750.00			
19	1700.00		1700.00	10/23/66	J. M. KHALTON	1700.00	P	19						1700.00			
20	1250.00		1250.00	10/23/66	FRANK S. GREGG	1250.00	P	20						1250.00			
21	100.00		100.00	10/23/66	W. J. JACKSON - DOLLARITE	100.00	P	21						1200.00			
22	100.00		100.00	10/23/66	MICHAEL A. GILLEN	100.00	P	22						250.00			
23	1250.00		1250.00	10/23/66	ALAN P. GILES	1250.00	P	23						1250.00			
24	200.00		200.00	10/23/66	MICHAEL A. GILLEN	200.00	P	24						2100.00			
25	575.00		575.00	10/23/66	BRISWOTT PAC	575.00	P	25						575.00			
26	400.00		400.00	10/23/66	BARRY YAKER	400.00	P	26						4000.00			
27	400.00		400.00	10/23/66	MICHIGAN UAW PAC	400.00	P	27							400.00		
28								28							25.00		
29								29							21.00		
30	264.50		264.50					30									
T								T	(5000.00)	(100.00)	(1000.00)	(8250.00)	(400.00)	(1000.00)	(1000.00)	(1000.00)	

CASH PROOF: ON HAND

ALL CHECKS & END OF DAY

BANK DEPOSIT

ON HAND & END OF DAY

2104032803

	CHECKS	CASH	NET PAYMENT	DATE	NAME	BALANCE	DESCRIPTION	CONTRIBUTIONS	500 CLUB	CENTURY FUND	MEMBER SHIPS	JEFF. JACK TICKETS	JEFF. JACK ADS	PRESIDENT'S CLUB	SPECIAL EVENTS	BINGO
F			100.00	1/25/60	WILLIAM E. DOLD	100.00		F								
1	200.00		200.00	1/25/60	WILLIAM E. DOLD	200.00	Q	1								
2	100.00		100.00	1/25/60	WILLIAM E. DOLD	100.00	Q	2								
3	100.00		100.00	1/25/60	WILLIAM E. DOLD	100.00	Q	3								
4	100.00		100.00	1/25/60	WILLIAM E. DOLD	100.00	Q	4								
5	100.00		100.00	1/25/60	WILLIAM E. DOLD	100.00	Q	5								
6	100.00		100.00	1/25/60	WILLIAM E. DOLD	100.00	Q	6								
7	100.00		100.00	1/25/60	WILLIAM E. DOLD	100.00	Q	7								
8	100.00		100.00	1/25/60	WILLIAM E. DOLD	100.00	Q	8								
9	100.00		100.00	1/25/60	WILLIAM E. DOLD	100.00	Q	9								
10	100.00		100.00	1/25/60	WILLIAM E. DOLD	100.00	Q	10								
11	100.00		100.00	1/25/60	WILLIAM E. DOLD	100.00	Q	11								
12	200.00		200.00	1/25/60	WILLIAM E. DOLD	200.00	S	12								
13	200.00		200.00	1/25/60	WILLIAM E. DOLD	200.00	S	13								
14	200.00		200.00	1/25/60	WILLIAM E. DOLD	200.00	S	14								
15	200.00		200.00	1/25/60	WILLIAM E. DOLD	200.00	S	15								
16	200.00		200.00	1/25/60	WILLIAM E. DOLD	200.00	S	16								
17	200.00		200.00	1/25/60	WILLIAM E. DOLD	200.00	S	17								
18	200.00		200.00	1/25/60	WILLIAM E. DOLD	200.00	S	18								
19	200.00		200.00	1/25/60	WILLIAM E. DOLD	200.00	S	19								
20	200.00		200.00	1/25/60	WILLIAM E. DOLD	200.00	S	20								
21	200.00		200.00	1/25/60	WILLIAM E. DOLD	200.00	S	21								
22	200.00		200.00	1/25/60	WILLIAM E. DOLD	200.00	S	22								
23	200.00		200.00	1/25/60	WILLIAM E. DOLD	200.00	S	23								
24	200.00		200.00	1/25/60	WILLIAM E. DOLD	200.00	S	24								
25	100.00		100.00	1/25/60	WILLIAM E. DOLD	100.00	S	25								
26	100.00		100.00	1/25/60	WILLIAM E. DOLD	100.00	S	26								
27	100.00		100.00	1/25/60	WILLIAM E. DOLD	100.00	S	27								
28	100.00		100.00	1/25/60	WILLIAM E. DOLD	100.00	S	28								
29	100.00		100.00	1/25/60	WILLIAM E. DOLD	100.00	S	29								
30	200.00		200.00	1/25/60	WILLIAM E. DOLD	200.00	S	30								
T			3682.40					T								

ON HAND

ALL CHECKS

DATE DEPOSIT

ON HAND
END OF DAY

21040332804

QAD ON TOP PEG

C + F

K

L

A

P

Q

	CHECKS	CASH	NET PAYMENT	DATE	NAME	BALANCE	DESCRIPTION		CONTRIBUTIONS	500 CLUB	CENTURY FUND	MEMBER SHIPS	JEFF JACK TICKETS	JEFF JACK ADS	PRESIDENTS CLUB	SPECIAL EVENTS	BINGO
F	4.00		4.00	7/1/00	7/3/00 THOMAS K. FANDEL	11.00	S	F								97.00	
1	91.00		91.00	7/1/00	7/3/00 THOMAS J. FANDEL	11.00	S	1								99.00	
2	200.00		200.00	7/1/00	7/3/00 N.A. + AGNES FEDEWA	200.00	S	2								200.00	
3	100.00		100.00	7/1/00	7/3/00 GEORGE HAMMOND FLEET	100.00	S	3								100.00	
4	1.00		1.00	7/1/00	7/3/00 MARY ANN GARLAK	11.00	S	4								99.00	
5	50.00		50.00	7/1/00	7/3/00 LOREN F GERBER	50.00	S	5								50.00	
6	191.00		191.00	7/1/00	7/3/00 BERNARD GLIEBERMAN	191.00	S	6								198.00	
7	100.00		100.00	7/1/00	7/3/00 JOSEPH J. GRELLA	100.00	S	7								100.00	
8	390.50		390.50	7/1/00	7/3/00 BETH LOCAL SE-PEG. UNIT	390.50	S	8								390.50	
9	100.00		100.00	7/1/00	7/3/00 MIRION E. JACKSON	100.00	S	9								100.00	
10	91.00		91.00	7/1/00	7/3/00 WARD N. KIRBY	91.00	S	10								99.00	
11	191.00		191.00	7/1/00	7/3/00 KRAMER, NELLEN,	191.00	S	11								198.00	
12					7/3/00 WAGNER ISABELA P.A.C.			12									
13	11.00		11.00	7/1/00	7/3/00 ALA SAKS MERRICINN	11.00	S	13								195.00	
14	11.00		11.00	7/1/00	7/3/00 MI ELEC. CAS 1. N PAC	11.00	S	14								198.00	
15	175.00		175.00	7/1/00	7/3/00 MICH-PAC	175.00	S	15								198.00	
16	1.00		1.00	7/1/00	7/3/00 ROBERT NYSTROM	1.00	S	16								74.00	
17	100.00		100.00	7/1/00	7/3/00 JOHN M. O'HARA	100.00	S	17								100.00	
18	11.00		11.00	7/1/00	7/3/00 ALAN SMALL "SHAWHANESSEY"	11.00	S	18								198.00	
19	11.00		11.00	7/1/00	7/3/00 CAMERON G. PIERCE	11.00	S	19								198.00	
20	50.00		50.00	7/1/00	7/3/00 KATHLEEN J. REESER	50.00	S	20								50.00	
21	175.00		175.00	7/1/00	7/3/00 DAVID ROSEMAN	175.00	S	21								198.00	
22	191.00		191.00	7/1/00	7/3/00 FRANK SALMONE	191.00	S	22								198.00	
23	1.00		1.00	7/1/00	7/3/00 JOHN W. SAVICH	1.00	S	23								99.00	
24	1.00		1.00	7/1/00	7/3/00 SCHOOL ALLIANCE P.A.C.	1.00	S	24								74.00	
25	1.00		1.00	7/1/00	7/3/00 SCHOOL ALLIANCE P.A.C.	1.00	S	25								99.00	
26	1.00		1.00	7/1/00	7/3/00 SCHOOL ALLIANCE P.A.C.	1.00	S	26								74.00	
27	4.00		4.00	7/1/00	7/3/00 SCHOOL ALLIANCE P.A.C.	4.00	S	27								99.00	
28	1.00		1.00	7/1/00	7/3/00 SCHOOL ALLIANCE P.A.C.	1.00	S	28								74.00	
29	1.00		1.00	7/1/00	7/3/00 SCHOOL ALLIANCE P.A.C.	1.00	S	29								74.00	
30					7/3/00 DAVE R. SHRIK		S	30									
T	906.00		906.00					T								(=16.50)	

CASH PROOF: ON HAND

ALL CHECKS

BANK DEPOSIT

ON HAND
END OF DAY

PAGE NO 3
DATE 7/3/00

9104032805

AD ON TOP PEG
CAMPAIGN '86

	CHECKS	CASH	NET PAYMENT	DATE	NAME	BALANCE	DESCRIPTION	CONTR. BUTTONS	900 CLUB	CENTURY FUND	MEMBER SHIPS	JEFF JACK TICKETS	JEFF JACK ROS	PRESIDENTS CLUB	SPECIAL EVENTS	BINGO
F	193.00		198.00	7/23/86	NATHAN TAPNOW	272.00	S	F							193.00	
1	250.00		250.00	7/23/86	DONALD MARGARET THURBER	250.00	S	1							250.00	
2	100.00		100.00	7/23/86	ANTHONY TRAVIS	100.00	S	2							100.00	
3	1100.00		910.00	7/23/86	CLAUDE E WALL	110.00	S	3							99.00	
4	100.00		100.00	7/23/86	WILLIAM F. WILSON	77.00	S	4							99.00	
5	200.00		200.00	7/23/86	BEVERLY WICKMAN	200.00	S	5							200.00	
6	100.00		100.00	7/23/86	TIMOTHY L. GENDROY	100.00	T	6								100.00
7	100.00		100.00	7/23/86	W. PAUL MYERS	100.00	T	7								100.00
8	200.00		200.00	7/23/86	DEPTAS OF MICHIGAN	100.00	V	8								
9	100.00		100.00	7/23/86	JAMES P. HALLAN	100.00	V	9								
10	750.00		750.00	7/23/86	MORSEMAN'S BENEVOLENT	1200.00	V	10								
					PROTECTIVE ASSN OF I			11								
12	100.00		100.00	7/23/86	LENN E MEYER	100.00	V	12								
13								13								
14								14								
15								15								
16								16								
17								17								
18								18								
19								19								
20								20								
21								21								
22								22								
23								23								
24								24								
25								25								
26								26								
27								27								
28								28								
29								29								
30								30								
T	1711.00							T	500.00	400.00	1000.00	250.00	400.00	1183.00	174.00	200.00

550 37.58

CASH PROOF: ON HAND

ALL CHECKS + AND CASH REC'D BANK DEPOSIT

ON HAND - END OF DAY

PAGE NO 427
DATE 10/1/86

9104032806

CAMPAIGN '86
AD ON TOP PEG
12/10/86

	CHECKS	CASH	NET PAYMENT	DATE	NAME	BALANCE	DESCRIPTION	CONTRIBUTIONS	800- CLUB	CENTURY FUND	MEMBER SHIPS	JEFF JACK TICKETS	JEFF JACK ADS	PRESIDENTS CLUB	SPECIAL EVENTS	BINGO
F	125.00		125.00	12/10/86	JOHN ZOLIS	125.00	P	F	125.00							
1	170.00		170.00	12/10/86	ELIOT L. REITNER	170.00	P	1	170.00							
2	100.00		100.00	12/10/86	ROBERTA SOPHIA MCCARGAR	100.00	T	2			100.00					
3	7.00		9.00	12/10/86	JENNIS M. AYRON	9.00	S	3		79.00						
4	50.00		50.00	12/10/86	TED R. DOKAS	50.00	S	4		50.00						
5	1500.00			12/10/86	(NICKINSON, WRIGHT) FOR		S	5		1500.00						
6			36.00		RICHARD P. JENSEN	36.00		6								
7			36.00		ERIN U. FREEMAN	36.00		7								
8			36.00		GERALD HARRIS	36.00		8								
9			36.00		JOHN J. L. HARRIS	36.00		9								
10			36.00		JOHN J. L. HARRIS II	36.00		10								
11			36.00		JOHN J. L. HARRIS	36.00		11								
12			36.00		CHARLES CLIPPERT	36.00		12								
13			36.00		ROSELLA M. NAIR	36.00		13								
14			36.00		JOHN S. GOTT	36.00		14								
15			36.00		ROBERT G. JACOBSON	36.00		15								
16			36.00		JOHN J. L. HARRIS	36.00		16								
17			36.00		JOHN J. L. HARRIS	36.00		17								
18			36.00		JOHN J. L. HARRIS	36.00		18								
19			36.00		JOHN J. L. HARRIS	36.00		19								
20			36.00		JOHN J. L. HARRIS	36.00		20								
21			36.00		JOHN J. L. HARRIS	36.00		21								
22			36.00		JOHN J. L. HARRIS	36.00		22								
23			36.00		JOHN J. L. HARRIS	36.00		23								
24			36.00		JOHN J. L. HARRIS	36.00		24								
25			36.00		FRANK G. POLLOCK	36.00		25								
26			36.00		JOHN J. L. HARRIS	36.00		26								
27			36.00		JOHN J. L. HARRIS	36.00		27								
28			36.00		JOHN J. L. HARRIS	36.00		28								
29			36.00		JOHN J. L. HARRIS	36.00		29								
30			36.00		JOHN J. L. HARRIS	36.00		30								
T			4.99					T	(2150.00)	(1047.00)	(100.00)					

CASH PROOF: ON HAND

ALL CHECKS
+ AND CASH REC'D

BANK DEPOSIT

ON HAND
END OF DAY

PAGE NO. 1/1
DATE 12/10/86

91040832807

	CHECKS	CASH	NET PAYMENT	DATE	NAME	BALANCE	DESCRIPTION		CONTRIBUTIONS	500- CLUB	CENTURY FUND	MEMBER SHIPS	JEFF JACK TICKETS	JEFF JACK ADS	PRESIDENTS CLUB	SPECIAL EVENTS	BINGO
F	9.00		99.00	1/16	WILLIAM A. EDWARDS	99.00	S	F			99.00						
1	1.00		100.00	1/16	WALTER W. EDWARDS JR	100.00	S	1			100.00						
2			300.00	1/16	MANUEL P. GARCIA	300.00	S	2			300.00						
3	1.00		91.00	1/16	PAUL A. GINSBURG	91.00	S	3			99.00						
4			77.00	1/16	SCOTT J. JOSEPH	77.00	S	4			77.00						
5			20.00	1/16	F. A. KARAS	20.00	S	5			20.00						
6	1.00		111.00	1/16	MICHAEL STEEL PAC	111.00	S	6			199.00						
7	1.00		100.00	1/16	WILLIAM J. MURPHY	100.00	S	7			99.00						
8			100.00	1/16	WILSON PERCE	100.00	S	8			100.00						
9			191.00	1/16	WILLIAM R. SANDERS	191.00	S	9			191.00						
10	1.00		192.00	1/16	PATRICIA M. TALLMAGE	192.00	S	10			191.00						
11			100.00	1/16	WILLIAM J. TROBEN	100.00	S	11			99.00						
12			100.00	1/16	WILLIAM J. TROBEN	100.00	S	12			99.00						
13			100.00	1/16	WILLIAM J. TROBEN	100.00	S	13			99.00						
14			200.00	1/16	WILLIAM J. TROBEN	200.00	S	14			200.00						
15								15									
16								16									
17								17									
18								18									
19								19									
20								20									
21								21									
22								22									
23								23									
24								24									
25								25									
26								26									
27								27									
28								28									
29								29									
30								30			100.00						
T								T			2950.00	3657.00	100.00				

707.60

CASH BALANCE ON HAND

ALL CHECKS
+ AND CASH REC'D

- BANK DEPOSIT

ON HAND
= END OF DAY

PAGE NO.
DATE

80822804012

91040332309

LOAD ON TOP PEG
10/15/86

C I L N P T

	CHECKS	CASH	NET PAYMENT	DATE	NAME	BALANCE	DESCRIPTION	CONTRIBUTIONS	100 CLUB	CENTURY FUND	MEMBER SHARES	JEFF-BACK TICKETS	JEFF-BACK ADD	PRESIDENT'S CLUB	SPECIAL EVENTS	OTHER
F	500.00		500.00	10/15/86	LISA ELAINE TRUXELL	500.00	N					500.00				
1	500.00		500.00	10/15/86	CARL ROSENFELD	500.00	N					500.00				
2	400.00		400.00	10/15/86	ANTHONY SCAVE	520.00	L				400.00					
3	1250.00		1250.00	10/15/86	MAY J. PIACUS	1250.00	P						1250.00			
4	1250.00		1250.00	10/15/86	WILLIAM B. JETTER	1250.00	P						1250.00			
5	2200.00		2200.00	10/15/86	LINDA A. NELSON	2200.00	P						2200.00			
6	1250.00		1250.00	10/15/86	ALLEN STATE PAC	1250.00	P						1250.00			
7	625.00		625.00	10/15/86	GERARD E. SIMON	1125.00	P						625.00			
8	625.00		625.00	10/15/86	BEILE KIKES	625.00	P						625.00			
9	1250.00		1250.00	10/15/86	RICHARD P. KUGHN	1250.00	P						1250.00			
10	1250.00		1250.00	10/15/86	PATRICK T. MCTIGUE	1250.00	P						1250.00			
11	1250.00		1250.00	10/15/86	WALTER J. GUNTER	1250.00	P						1250.00			
12	1250.00		1250.00	10/15/86	WILLIAM E. CARSON	1250.00	P						1250.00			
13	1250.00		1250.00	10/15/86	EDWARD WINGRAD	1250.00	P						1250.00			
14	1250.00		1250.00	10/15/86	HAIFA FAKHOURI	1250.00	P						1250.00			
15	1000.00		1000.00	10/15/86	TEA CATERERS	1000.00	I			1000.00						
16	500.00		500.00	10/15/86	GAS WORKERS LOCAL PAC	500.00	C		500.00							
17	15000.00		15000.00	10/15/86	STATE RELIGION DE	15000.00	C		15000.00							
18			50.00	10/15/86	KATE VANCE	50.00	T						50.00			
19			2500.00	10/15/86	WILLIAM J. GONZALEZ	2500.00	T						2500.00			
20			500.00	10/15/86	TRU GUNTER FUND	500.00	T						500.00			
T	75500.00		75500.00						75500.00	10000.00	4000.00	760.00	1474.00	2650.00		

CASH PROOF ON HAND
START OF DAY

ALL CHECKS
F AND CASH REC'D

BANK DEPOSIT

ON HAND
END OF DAY

PAGE NO
DATE

	CHECKS	CASH	NET PAYMENT	DATE	NAME	BALANCE	DESCRIPTION		CONTRIBUTIONS	500 CLUB	CENTURY FUND	MEMBER SHIPS	JEST JACK- TICKETS	JEST JACK- ADS	PRESIDENT'S CLUB	SPECIAL EVENTS	BINGO
F	250.00		250.00	10/10	MICHIGAN UAW PAC ✓	250.00	N	F			250.00						
1	50.00		50.00	10/10	KARL R. LUKENS ✓	50.00	N	1			50.00						
2	50.00		50.00	10/10	EUGENE E. NOREY ✓	50.00	N	2			50.00						
3	50.00		50.00	10/10	WALTER A. DAVUK ✓	50.00	N	3			50.00						
4	200.00		200.00	10/10	JOSEPH J. MURULLO ✓	200.00	N	4			200.00						
5	50.00		50.00	10/10	LEONARD HINTE ✓	50.00	N	5			50.00						
6	100.00		100.00	10/10	FREEST YOUNG BLOOD OEF ✓	100.00	N	6			100.00						
7	250.00		250.00	10/10	GOT ADM ASSOC POLED ✓	250.00	N	7			250.00						
8	50.00		50.00	10/10	WILLIAM F. KONEY ✓	50.00	N	8			50.00						
9	100.00		100.00	10/10	MADALINE MARINACCI ✓	100.00	N	9			100.00						
10	150.00		150.00	10/10	CLAUDE A. RICHARDS ✓	150.00	N	10			150.00						
11	250.00		250.00	10/10	PAUL R. C. ISLEY ✓	250.00	N	11			250.00						
12	300.00		300.00	10/10	ROBERT E. WADE ✓	300.00	N	12			300.00						
13	100.00		100.00	10/10	WILLIAM G. SAWYER ✓	100.00	N	13			100.00						
14	50.00		50.00	10/10	STEPHAN FURRO ✓	50.00	N	14			50.00						
15	50.00		50.00	10/10	T. J. J. LESONSKI ✓	50.00	N	15			50.00						
16	50.00		50.00	10/10	LEE KIRILUK ✓	50.00	N	16			50.00						
17	50.00		50.00	10/10	ELIZABETH THURMAN GRANT ✓	50.00	N	17			50.00						
18	50.00		50.00	10/10	CAROLYN G. LUKA ✓	50.00	N	18			50.00						
19	100.00		100.00	10/10	WILLIAM J. KINGER ✓	100.00	N	19			100.00						
20	100.00		100.00	10/10	RENEA KRYSER ✓	100.00	N	20			100.00						
21	50.00		50.00	10/10	CARL J. MARLINGA ✓	50.00	N	21			50.00						
22	650.00		650.00	10/10	CARL J. MARLINGA ✓	650.00	N	22			650.00						
23	100.00		100.00	10/10	STANISLAW ST. CALKOWSKI ✓	100.00	N	23			100.00						
24	50.00		50.00	10/10	PAUL S. KREWSKI ✓	50.00	N	24			50.00						
25	200.00		200.00	10/10	WITE KORDON E. ✓	200.00	N	25			200.00						
26					WITE KORDON E. ✓		N	26									
27	50.00		50.00	10/10	WITE KORDON E. ✓	50.00	N	27			50.00						
28	100.00		100.00	10/10	EDWARD E. C. LUKA ✓	100.00	N	28			100.00						
29	100.00		100.00	10/10	EDWARD E. C. LUKA ✓	100.00	N	29			100.00						
30	264.50		264.50					30									
T			3675.00					T			(1675.00)						

10 OCTOBER 1986

 CASH PROOF: ON HAND
START OF DAY

 ALL CHECKS
+ AND CASH REC'D

- BANK DEPOSIT

 ON HAND
END OF DAY

 PAGE NO.
DATE

2104032810

	CHECKS	CASH	NET PAYMENT	DATE	NAME	BALANCE	DESCRIPTION	CONTR BUTIONS	500 CLUB	CENTURE- YRBD	MEMBER SHARES	JEE-JACA TICKETS	JEE-JACA ADS	PRESIDENTS CLUB	SPECIAL EVENTS	BINGO
1	100.00		100.00	7/10/16	JERRY J. AGORE ✓	100.00	N	F		100.00						
2	50.00		50.00	7/10/16	B-N ALFELLO ✓	50.00	N	1		50.00						
3	50.00		50.00	7/10/16	SOPHIA A BRONE ✓	50.00	N	2		50.00						
4	200.00		200.00	7/10/16	WOODWARD U WOODY ✓	200.00	N	3		200.00						
5	250.00		250.00	7/10/16	PATRICK J COSTA ✓	250.00	N	4		250.00						
6	150.00		150.00	7/10/16	FRED J KELLY ✓	150.00	N	5		150.00						
7	500.00		500.00	7/10/16	ED KOPY ✓	500.00	N	6		500.00						
8	200.00		200.00	7/10/16	PIPEFITTERS LOC 436 PAC ✓	200.00	N	7		200.00						
9	100.00		100.00	7/10/16	LEONARD CELESKY ✓	100.00	N	8		100.00						
10	100.00		100.00	7/10/16	JOSEPH SAMUELEWICZ ✓	100.00	N	9		100.00						
11	50.00		50.00	7/10/16	JOSEPH CARRAN-AGE, JR ✓	50.00	N	10		50.00						
12	50.00		50.00	7/10/16	SAM LENTINE ✓	50.00	N	11		50.00						
13	50.00		50.00	7/10/16	MYTON J. TRIPP ✓	50.00	N	12		50.00						
14	50.00		50.00	7/10/16	LAURINCE NAWAS ✓	50.00	N	13		50.00						
15	300.00		300.00	7/10/16	ROMAN ULMAN ✓	300.00	N	14		300.00						
16	100.00		100.00	7/10/16	MUKESH J. PATEL ✓	100.00	N	15		100.00						
17	50.00		50.00	7/10/16	SCENE NOWICKI ✓	50.00	N	16		50.00						
18	50.00		50.00	7/10/16	J.A. PLUMBERS LOCAL 99 ✓	50.00	N	17		50.00						
19	50.00		50.00	7/10/16	JOHN M. BRIDGMAN ✓	50.00	N	18		50.00						
20	100.00		100.00	7/10/16	LOUIS F. SIMPSON ✓	100.00	N	19		100.00						
21	50.00		50.00	7/10/16	BERNARD HARRIS ✓	50.00	N	20		50.00						
22	50.00		50.00	7/10/16	TED J. HANSON ✓	50.00	N	21		50.00						
23	50.00		50.00	7/10/16	ANTHONY J. HUNTER ✓	50.00	N	22		50.00						
24	50.00		50.00	7/10/16	ANTHONY J. HUNTER ✓	50.00	N	23		50.00						
25	100.00		100.00	7/10/16	DALE J. JABLONSKI ✓	100.00	N	24		100.00						
26	50.00		50.00	7/10/16	ROBERT KILGORE ✓	50.00	N	25		50.00						
27	50.00		50.00	7/10/16	WILLIAM J. GUNTER ✓	50.00	N	26		50.00						
28	50.00		50.00	7/10/16	DENNIS E. GOLPE ✓	50.00	N	27		50.00						
29	50.00		50.00	7/10/16	STEVEN J. HEAD ✓	50.00	N	28		50.00						
30	3520.00							T		(3520.00)						
			3520.00													

CASH PROOF: ON HAND
START OF DAYALL CHECKS
+ AND CASH REC'D

BANK DEPOSIT

ON HAND
END OF DAYPAGE NO
DATE

11823804016

	CHECKS	CASH	NET PAYMENT	DATE	NAME	BALANCE	DESCRIPTION		CONTRIBUTIONS	500 CLUB	CENTUR-ELUND	MEMBER SHIRS	JEFF-JACK TICKETS	JEFF-JACK ADS-	PRESIDENTS CLUB	SPECIAL EVENTS	BINGO
F	30.00		300.00	7/10/68	RON KENZIE	200.00	N	F			200.00						
1	10.00		100.00	7/10/68	RONALD DAWES	100.00	N	1			100.00						
2	50.00		500.00	7/10/68	ALPHONSE R. SZYMANSKI	500.00	N	2			500.00						
3	100.00		1000.00	7/10/68	JOHN J. HEACHER	1000.00	N	3			1000.00						
4	50.00		500.00	7/10/68	JAMES KAREK	500.00	N	4			500.00						
5	200.00		2000.00	7/10/68	JEFF RAZER	2000.00	N	5			2000.00						
6	100.00		1000.00	7/10/68	KEEG J. J. J. J.	1000.00	N	6			1000.00						
7	50.00		500.00	7/10/68	STEVE J. K. WSKI, JR.	500.00	N	7			500.00						
8	100.00		1000.00	7/10/68	VILFR G. JANSON	1000.00	N	8			1000.00						
9	50.00		500.00	7/10/68	ED SMITH	500.00	N	9			500.00						
10	50.00		500.00	7/10/68	WALTER A. PARUK	500.00	N	10			500.00						
11	50.00		500.00	7/10/68	JOHN J. JANSON	500.00	N	11			500.00						
12	50.00		500.00	7/10/68	MATTHEW C. EMPIREK	500.00	N	12			500.00						
13	50.00		500.00	7/10/68	DAVID A. MCCINNAN	500.00	N	13			500.00						
14	100.00		1000.00	7/10/68	HOWARD G. ROBINSON	1000.00	N	14			1000.00						
15	100.00		1000.00	7/10/68	GEORGE L. PEREW	1000.00	N	15			1000.00						
16	100.00		1000.00	7/10/68	LEONARD J. MARSHALL	1000.00	N	16			1000.00						
17	50.00		500.00	7/10/68	JOHN K. LLOYD	500.00	N	17			500.00						
18	50.00		500.00	7/10/68	JOHN J. J. J. J.	500.00	N	18			500.00						
19	50.00		500.00	7/10/68	JOHN J. J. J. J.	500.00	N	19			500.00						
20	50.00		500.00	7/10/68	JOHN J. J. J. J.	500.00	N	20			500.00						
21	50.00		500.00	7/10/68	JOHN J. J. J. J.	500.00	N	21			500.00						
22	100.00		1000.00	7/10/68	JOHN J. J. J. J.	1000.00	N	22			1000.00						
23	50.00		500.00	7/10/68	JOHN J. J. J. J.	500.00	N	23			500.00						
24	50.00		500.00	7/10/68	JOHN J. J. J. J.	500.00	N	24			500.00						
25	100.00		1000.00	7/10/68	JOHN J. J. J. J.	1000.00	N	25			1000.00						
26	50.00		500.00	7/10/68	JOHN J. J. J. J.	500.00	N	26			500.00						
27	50.00		500.00	7/10/68	JOHN J. J. J. J.	500.00	N	27			500.00						
28	50.00		500.00	7/10/68	JOHN J. J. J. J.	500.00	N	28			500.00						
29	50.00		500.00	7/10/68	JOHN J. J. J. J.	500.00	N	29			500.00						
30	50.00		500.00	7/10/68	JOHN J. J. J. J.	500.00	N	30			500.00						
T	250.00		2500.00					T			2500.00						

2000

CASH PROOF: ON HAND START OF DAY + ALL CHECKS AND CASH REC'D - BANK DEPOSIT ON HAND END OF DAY

PAGE NO. 1
DATE 7/10/68

21040832812

	CHECKS	CASH	NET PAYMENT	DATE	NAME	BALANCE	DESCRIPTION		CONTRIBUTIONS	500- CLUB	CENTURY FUND	MEMBER SHIPS	JEFF- TICKETS	JEFF- RODS	FRESHWATER CLUB	SPECIAL EVENTS	BINGO
F	250.00		250.00	7/1/76	CHARLES S. KASSAB	250.00	N	F			250.00						
1	100.00		100.00	7/2/76	JAMES R. WILKINS	100.00	N	1			100.00						
2	50.00		50.00	7/1/76	KAREN G. WATKINS	50.00	N	2			50.00						
3	250.00		250.00	7/1/76	TED MROZOWSKI	250.00	N	3			250.00						
4	250.00		250.00	7/1/76	HOW SEMPER	250.00	N	4			250.00						
5	500.00		500.00	7/1/76	EUGENE R. BOJANSKI	500.00	N	5			500.00						
6	50.00		50.00	7/1/76	LAWRENCE A. BALWISZYN	50.00	N	6			50.00						
7	50.00		50.00	7/1/76	JANET RAUER	50.00	N	7			50.00						
8	100.00		100.00	7/1/76	LOUISE F. BURDICK	100.00	N	8			100.00						
9	50.00		50.00	7/1/76	LAWRENCE A. WOLFE	50.00	N	9			50.00						
10	200.00		200.00	7/1/76	ROBERT E. RUPINSKY	200.00	N	10			200.00						
11	50.00		50.00	7/1/76	JOAN STRAIN	50.00	N	11			50.00						
12	50.00		50.00	7/1/76	KEP VINE SURTILLEY	50.00	N	12			50.00						
13	50.00		50.00	7/1/76	JOHN TERNOW	50.00	N	13			50.00						
14	100.00		100.00	7/1/76	JOHN TERNOW	100.00	N	14			100.00						
15	50.00		50.00	7/1/76	JOHN TERNOW	50.00	N	15			50.00						
16	50.00		50.00	7/1/76	JOHN TERNOW	50.00	N	16			50.00						
17	50.00		50.00	7/1/76	JOHN TERNOW	50.00	N	17			50.00						
18	50.00		50.00	7/1/76	JOHN TERNOW	50.00	N	18			50.00						
19	50.00		50.00	7/1/76	JOHN TERNOW	50.00	N	19			50.00						
20	500.00		500.00	7/1/76	JOHN TERNOW	500.00	N	20			500.00						
21	50.00		50.00	7/1/76	JOHN TERNOW	50.00	N	21			50.00						
22	50.00		50.00	7/1/76	JOHN TERNOW	50.00	N	22			50.00						
23	50.00		50.00	7/1/76	JOHN TERNOW	50.00	N	23			50.00						
24	50.00		50.00	7/1/76	JOHN TERNOW	50.00	N	24			50.00						
25	50.00		50.00	7/1/76	JOHN TERNOW	50.00	N	25			50.00						
26	100.00		100.00	7/1/76	JOHN TERNOW	100.00	N	26			100.00						
27	40.00		40.00	7/1/76	JOHN TERNOW	40.00	N	27			40.00						
28	100.00		100.00	7/1/76	JOHN TERNOW	100.00	N	28			100.00						
29	50.00		50.00	7/1/76	JOHN TERNOW	50.00	N	29			50.00						
30	50.00		50.00	7/1/76	JOHN TERNOW	50.00	N	30			50.00						
T								T									

CASH PROOF: ON HAND START OF DAY + ALL CHECKS AND CASH REC'D BANK DEPOSIT ON HAND END OF DAY

PAGE NO
DATE

3104032313

	CHECKS	CASH	NET PAYMENT	DATE	NAME	BALANCE	DESCRIPTION		CONTRIBUTIONS	1000 CLUB	CENTURY FUND	MEMBER SHIPS	JEFF JACK MEMBERS	JEFF JACK ADS	PRESIDENTS CLUB	SPECIAL EVENTS	OTHER
F	10000.00		10000.00	10/10/54	ASSOCIATED PAUL 25-CONF. FUND	10000.00	C	F								10000.00	
1	10000.00		10000.00	10/10/54	ACTION FUND OF SHEPHERD	10000.00	D	1									10000.00
2					LEHMAN BROTHERS INC.			2									
3	200.00		200.00	10/10/54	T. MICHAEL DOYLE	200.00	AT-SP	3									
4	1800.00		1800.00	10/10/54	SIDNEY A LUTZ	1800.00	P	4					1800.00				
5	1250.00		1250.00	10/10/54	RICHARD L VANTIER	1250.00	P	5					1250.00				
6	1250.00		1250.00	10/10/54	SQUAD 4 ROBERTS	1250.00	P	6					1250.00				
7	6000.00		6000.00	10/10/54	CASTAL CORP. IANR	6000.00	P	7					6000.00				
8					EMP. ACTION FUND - MI			8									
9	1500.00		1500.00	10/10/54	MICHAEL MCNEE	1500.00	P	9					1500.00				
10	2500.00		2500.00	10/10/54	DET. EDISON PAC - MIKA	2500.00	P	10					2500.00				
11	1250.00		1250.00	10/10/54	WILLIAM T. PIERCE	1250.00	P	11					1250.00				
12	1250.00		1250.00	10/10/54	PATRICK HEEHAN	1250.00	P	12					1250.00				
13	1250.00		1250.00	10/10/54	DALL - SUSAN NINE	1250.00	P	13					1250.00				
14	1250.00		1250.00	10/10/54	ERNEST M. SOLOMON	1250.00	P	14					1250.00				
15								15									
16								16									
17								17									
18								18									
19								19									
20								20									
21								21									
22								22									
23								23									
24								24									
25								25									
26								26									
27								27									
28								28									
29								29									
30								30									
T	33500.00							T					19300.00			10000.00	1000.00
		11500.00								10000.00	12645.50	3500.00	19300.00	2500.00	1400.00	10000.00	1000.00

5-1-55

CASH PROOF: ON HAND START OF DAY + ALL CHECKS + AND CASH REC'D - BANK DEPOSIT ON HAND END OF DAY

PAGE NO. 1
DATE

21040832814

7 3 1 CITY PRIN 10
LOAD ON TOP PIG
8 OCT 86

	CHECKS	CASH	NET PAYMENT	DATE	NAME	BALANCE	DESCRIPTION		CONTRI BUTIONS	800- CLUB	CENTURY FUND	MEMBER SHIPS	JEFF JACK TIGRETS	JEFF JACK ADS	PRESIDENT'S CLUB	SPECIAL EVENTS	RING
F	500.00		500.00	10/1/86	DAVID M. LEAHY ✓	300.00	L	F			500.00						
1	170.00		170.00	10/1/86	AL TURFE ✓	170.00	1700 CL	1		1700.00							
2	200.00		200.00	10/1/86	CHARLES H. H. ✓	200.00	M	2				200.00					
3	200.00		200.00	10/1/86	JOSEPH ALFANI ✓	200.00	M	3				200.00					
4	200.00		200.00	10/1/86	JERRY LENO ✓	200.00	M	4				200.00					
5	200.00		200.00	10/1/86	ARZO MATTI ✓	200.00	M	5				200.00					
6	200.00		200.00	10/1/86	JOE SEMMA ✓	200.00	M	6				200.00					
7	200.00		200.00	10/1/86	KHALID FOALIA ✓	200.00	M	7				200.00					
8	200.00		200.00	10/1/86	HAMID FARID ✓	200.00	M	8				200.00					
9	200.00		200.00	10/1/86	H. KALLA HT ✓	200.00	M	9				200.00					
10	150.00		150.00	10/1/86	A. RALA STITI ✓	150.00	O	10					150.00				
	150.00		150.00	10/1/86	R. J. BHAKTA ✓	150.00	O	11					150.00				
	150.00		150.00	10/1/86	JACOBSON + JIWAN RAJ ✓	150.00	O	12					150.00				
13	150.00		150.00	10/1/86	SAHAKAR E. RUTHALAN ✓	150.00	O	13					150.00				
14	150.00		150.00	10/1/86	THIRATH + RINDER ✓	150.00	O	14					150.00				
15	150.00		150.00	10/1/86	AMLUWALIA ✓	150.00	O	15					150.00				
16	150.00		150.00	10/1/86	NURUDDIN KARADIA ✓	150.00	O	16					150.00				
17	150.00		150.00	10/1/86	NEHINDHAR S. CH ✓	150.00	O	17					150.00				
18	150.00		150.00	10/1/86	SURHASH C. JANVEJA ✓	150.00	O	18					150.00				
19	150.00		150.00	10/1/86	RAJIA K. ISHAN ✓	150.00	O	19					150.00				
20	150.00		150.00	10/1/86	STAN P. JANVEJA ✓	150.00	O	20					150.00				
21	150.00		150.00	10/1/86	V. V. PATEL ✓	150.00	O	21					150.00				
22	150.00		150.00	10/1/86	V. + P. P. P. P. P. ✓	150.00	O	22					150.00				
23	150.00		150.00	10/1/86	H. KRISHAN VIN ✓	150.00	O	23					150.00				
24	150.00		150.00	10/1/86	K. P. SHIVNE ✓	150.00	O	24					150.00				
25	150.00		150.00	10/1/86	SURESH + SURESH PATE ✓	150.00	O	25					150.00				
26	150.00		150.00	10/1/86	V. P. S. P. P. P. ✓	150.00	O	26					150.00				
27	150.00		150.00	10/1/86	V. S. P. P. P. P. ✓	150.00	O	27					150.00				
28	150.00		150.00	10/1/86	V. S. P. P. P. P. ✓	150.00	O	28					150.00				
29	150.00		150.00	10/1/86	S. SHIVNE ✓	150.00	O	29					150.00				
30	150.00		150.00	10/1/86	S. SHIVNE ✓	150.00	O	30					150.00				
T	1295.00		1295.00					T		(1700.00)	(500.00)	(1600.00)	(1295.00)				

CASH PROOF: ON HAND START OF DAY + ALL CHECKS AND CASH REC'D - BANK DEPOSIT ON HAND END OF DAY

PAGE NO. 7
DATE

1040332315

	CHECKS	CASH	NET PAYMENT	DATE	NAME	BALANCE	DESCRIPTION		CONTRIBUTIONS	600- CLUB	CENTURY- FUND	MEMBER- SHARE	JEFF-JEFF TICKETS	JEFF-JACK ADS	PRESIDENT'S CLUB	SPECIAL EVENTS	BINGO
F	150.00		150.00	12/15/80	S. B. BHANSAI P.D.	150.00	0	F					150.00				
1	150.00		150.00	12/15/80	VED. JOSSAIN	150.00	0	1					150.00				
2	100.00		100.00	12/15/80	NIRMALA B. BHAYA	100.00	0	2					100.00				
3	100.00		100.00	12/15/80	SUNILKANTA N. GANGULY	100.00	0	3					100.00				
4	100.00		100.00	12/15/80	RAMDEVI CHAKRABARTY	100.00	0	4					100.00				
5	100.00		100.00	12/15/80	J.R. KAKARALA	100.00	0	5					100.00				
6	100.00		100.00	12/15/80	MARICOWDA NAGAPAN	100.00	0	6					100.00				
7	100.00		100.00	12/15/80	SABU R. VAULAKYDI	100.00	0	7					100.00				
8	100.00		100.00	12/15/80	PARM PURI	100.00	0	8					100.00				
9	100.00		100.00	12/15/80	SHANKER R. WARRIER	100.00	0	9					100.00				
10	100.00		100.00	12/15/80	KIRI. TOLIA	100.00	0	10					100.00				
11	100.00		100.00	12/15/80	SHAYAM P. SINGH	100.00	0	11					100.00				
12	100.00		100.00	12/15/80	ISHVARIAL PATEL	100.00	0	12					100.00				
13	100.00		100.00	12/15/80	K.S. S. P. NARAYAN	100.00	0	13					100.00				
14	100.00		100.00	12/15/80	DAULAT SINGH	100.00	0	14					100.00				
15	100.00		100.00	12/15/80	NARAHARISETHY RAO	100.00	0	15					100.00				
16	100.00		100.00	12/15/80	PAUL CHATIA	100.00	0	16					100.00				
17	100.00		100.00	12/15/80	R.S. K. VILGAE	100.00	0	17					100.00				
18	500.00		500.00	12/15/80	GANESH D. K. MOE	500.00	0	18					500.00				
19	150.00		150.00	12/15/80	ARISH VERMA	150.00	0	19					150.00				
20	150.00		150.00	12/15/80	V.M. RAO THAPPA	150.00	0	20					150.00				
21	150.00		150.00	12/15/80	NARENDRA THINGI	150.00	0	21					150.00				
22	150.00		150.00	12/15/80	ASHA KAJA	150.00	0	22					150.00				
23	150.00		150.00	12/15/80	P. SWARN R. PAL	150.00	0	23					150.00				
24	150.00		150.00	12/15/80	SHUBHA L. SINGH	150.00	0	24					150.00				
25	150.00		150.00	12/15/80	RACHU P. JESUDASANI	150.00	0	25					150.00				
26	150.00		150.00	12/15/80	3. USA - 1. 100	150.00	0	26					150.00				
27	150.00		150.00	12/15/80	1. 100	150.00	0	27					150.00				
28	150.00		150.00	12/15/80	RAMESH M. N. N. 100	150.00	0	28					150.00				
29	150.00		150.00	12/15/80	KULIN P. 100 KRI	150.00	0	29					150.00				
30								30									
T	4100.00		4100.00					T					(4100.00)				

CASH PROOF: ON HAND START OF DAY + ALL CHECKS + AND CASH RECD - BANK DEPOSIT - ON HAND END OF DAY

LOAD ON TOP PEG

	CHECKS	CASH	NET PAYMENT	DATE	NAME	BALANCE	DESCRIPTION		CONTRIBUTIONS	1700 CLUB	CENTURY FUND	NEWBORN GROUP	JEFF JACK THOMAS	JEFF JACK ADS	PRESIDENTS CLUB	SPECIAL EVENTS	BINGO
1																	
2																	
3																	
4																	
5																	
6																	
7																	
8																	
9																	
10																	
11																	
12																	
13																	
14																	
15																	
16																	
17																	
18																	
19																	
20																	
21																	
22																	
23																	
24																	
25																	
26																	
27																	
28																	
29																	
30																	
T																	

72.60

1700.00 500.00 1600.00 9750.00

3

1355.00

CASH PROOF: ON HAND START OF DAY + ALL CHECKS + AND CASH REC'D - BANK DEPOSIT - ON HAND END OF DAY

PAGE NO 3
DATE 11/1

7 1 0 4 0 3 2 3 1 7

9 1 0 4 0 3 3 2 3 1 8

LEAD ON TOP PEG
6 OCT 86

	CHECKS	CASH	NET PAYMENT	DATE	NAME	BALANCE	DESCRIPTION	DATE	CONTRIBUTIONS	BOO CLUB	MEMBER FUNDS	JEFF JACK TICKETS	JEFF JACK ADS	PRESIDENT'S CLUB	SPECIAL EVENTS	BONUS
1	4.00		4.00	10/1	PETER RINKES ✓	4100.00	M	1			400.00					
2	4.00		4.00	10/1	SAM KASSAM ✓	4100.00	M	1			400.00					
3	4.00		4.00	10/1	KENRAD STANCH ✓	4100.00	M	1			400.00					
4	3.00		3.00	10/1	BOB STEWART ✓	3000.00	I	1				300.00				
5	3.00		3.00	10/1	M. HARRIS J. HARRIS ✓	2000.00	I	1				200.00				
6	3.00		3.00	10/1	A. DIVERGILLO ✓	2000.00	I	1				200.00				
7	5.00		5.00	10/1	ALL STATE MP. ASSN. ✓	2000.00	CONT.	1	5000.00							
8					WILSEA-PAL ✓			1								
9								1								
10								1								
11								1								
12								1								
13								1								
14								1								
15								1								
16								1								
17								1								
18								1								
19								1								
20								1								
21								1								
22								1								
23								1								
24								1								
25								1								
26								1								
27								1								
28								1								
29								1								
30								1								
T	7100.00		7100.00					T	5000.00		1200.00	1200.00				

CASH PROOF ON HAND

ALL CHECKS
AND CASH REC'D

BANK DEPOSIT

ON HAND
END OF DAY

PAGE NO 1
DATE 8

CAMPAIGN '86
3 OCTOBER 86

	CHECKS	CASH	NET PAYMENT	DATE	NAME	BALANCE	DESCRIPTION	PAY CONTN BUTIONS	500 CASH	CENTURY FUND	MEMBER SHIPS	JEFF JACK TICKETS	JEFF JACK ADS	PRESIDENT'S CLUB	SPECIAL EVENTS	BING
F	5000.00		5000.00	9/30	UAW REGION I-B PAC	-0000.00		F	5000.00							
1	5000.00		5000.00	10/1	SELI COPE DEAFNESS-IMP	5000.00	Chn	1	5000.00							
2	700.00		700.00	10/1	ARNOLD V. ARONOFF	700.00		2								
3	1700.00		1700.00	10/1	THOMAS HADJY	1700.00	1000.00	3		1700.00						
4	200.00		200.00	10/1	ROBERT M. WILLIAMS	200.00		4								
5	250.00		250.00	10/1	MAURICE COMBAL	250.00		5								
6	150.00		150.00	10/1	CLAUDE J. TORIA	150.00		6								
7	800.00		800.00	10/1	NATE SUPERO	800.00		7								
8	500.00		500.00	10/1	EDWARD AVADENET	500.00		8								
9	250.00		250.00	10/1	RICH A. SMITH	250.00		9								
10	500.00		500.00	10/1	ALAN W. THORUP	500.00		10								
11	1000.00		1000.00	10/1	HERBERT D. DOAN	1000.00	MISC	11								
12	1100.00		1100.00	10/1	EDMUND RINGIER	1100.00		12	1000.00							
13	75.00		75.00	10/1	CHARLES G. MCCAN	75.00	CRISK-T	13								
14	75.00		75.00	10/1	BRUCE R. COLBY	75.00	CRISK-T	14								
15	150.00		150.00	10/1	LOUIS POPOVICS	150.00	CRISK-T	15								
16	150.00		150.00	10/1	ALAN W. THORUP	150.00	CRISK-T	16								
17	150.00		150.00	10/1	ET. D. A. TVS	150.00	CRISK-T	17								
18	150.00		150.00	10/1	CONSIDER	150.00	CRISK-T	18								
19			-300.00	10/1	CONSIDER	-300.00	CRISK-T	19								
20	150.00		150.00	10/1	MORRIS M. ROBIN	150.00	CRISK-T	20								
21	150.00		150.00	10/1	G. W. TILNIG	150.00	CRISK-T	21								
22	150.00		150.00	10/1	RICHARD S. LEMIER	150.00	CRISK-T	22								
23	150.00		150.00	10/1	IRENE BARTOLO	150.00	CRISK-T	23								
24	150.00		150.00	10/1	MARIA K. ZIA	150.00	CRISK-T	24								
25	150.00		150.00	10/1	MARIA K. ZIA	150.00	CRISK-T	25								
26	150.00		150.00	10/1	MARIA K. ZIA	150.00	CRISK-T	26								
27	75.00		75.00	10/1	MARIA K. ZIA	75.00	CRISK-T	27								
28	75.00		75.00	10/1	MARIA K. ZIA	75.00	CRISK-T	28								
29	150.00		150.00	10/1	MARIA K. ZIA	150.00	CRISK-T	29								
30	150.00		150.00	10/1	MARIA K. ZIA	150.00	CRISK-T	30								
T	74250.00		74250.00					T	5000.00	(1000.00)	(1000.00)			(350.00)	(200.00)	

CASH PROOF: ON HAND START OF DAY + ALL CHECKS AND CASH REC'D - BANK DEPOSIT - ON HAND END OF DAY

PAGE NO 1
DATE 10/1/86

91040332319

21040832820

3 21040832820
4 ON TOP PEG

	CHECKS	CASH	NET PAYMENT	DATE	NAME	BALANCE	DESCRIPTION	PAY CONTRIB- UTIONS	1700 CLUB K	CENTURY CLUB L	500 CLUB MEMBER- SHIPS M	SHARON JEFF-JACK TICKETS P	JEFF-JACK AGE I	CAROL PRESIDENT'S CLUB	SPECIAL EVENTS	BINGO
F	20.00		20.00	4/5/6	D. JIMINE NIGO	20.00	125/6-K			250.00						
1	25.00		25.00	4/5/6	A. E. TUNGUIN	25.00	125/6-K			25.00						
2	100.00		100.00	4/5/6	ANGELO DIKONIO	100.00	EV/CUB L				100.00					
3	100.00		100.00	4/5/6	ATKIN I KEATING	100.00	51/60-2				100.00					
4	100.00		100.00	4/5/6	AS PAC	100.00	51/60-2				100.00					
5	50.00		50.00	4/5/6	LOUIS J. BELLE	50.00	51/60-2				50.00					
6	100.00		100.00	4/5/6	VICTOR G. LANSSEN	100.00	EV/CUB-2				100.00					
7	50.00		50.00	4/5/6	GEORGE C. SIMON	50.00	EV/CUB L				50.00					
8	50.00		50.00	4/5/6	ALVIN H. RUTLEDGE	50.00	EV/CUB L				50.00					
9	50.00		50.00	4/5/6	PAUL J. HANNON	50.00	L				50.00					
10	50.00		50.00	4/5/6	WILLIAM N. HOFFER	50.00	L				50.00					
11	100.00		100.00	4/5/6	BERNARD M. FAUBER	100.00	L				100.00					
12	100.00		100.00	4/5/6	ALVIN C. PRITCHER	100.00	L				100.00					
13	100.00		100.00	4/5/6	ALEXANDER KITCHIE	100.00	L				100.00					
14	40.00		40.00	4/5/6	ALEXANDER KITCHIE	40.00	L				40.00					
15	800.00		800.00	4/5/6	JOHN C. RUNCO	800.00	L				800.00					
16	100.00		100.00	4/5/6	ANTHONY SCARF	100.00	L				100.00					
17	2000.00		2000.00	4/5/6	ROBERT M. RUNCO	2000.00	L				2000.00					
18	200.00		200.00	4/5/6	NICK ASMAR	200.00	M					200.00				
19	20.00		20.00	4/5/6	NICK ASMAR	20.00	M					20.00				
20	20.00		20.00	4/5/6	NORMAN KENNEDY	20.00	M					20.00				
21	20.00		20.00	4/5/6	NORMAN KENNEDY	20.00	M					20.00				
22	8.00		8.00	4/5/6	JOHN V. JORDAN	8.00	M					8.00				
23	800.00		800.00	4/5/6	JOHN V. JORDAN	800.00	M					800.00				
24	100.00		100.00	4/5/6	JOHN V. JORDAN	100.00	M					100.00				
25	100.00		100.00	4/5/6	EDDIE H. KIZAT	100.00	M					100.00				
26	40.00		40.00	4/5/6	EDDIE H. KIZAT	40.00	M					40.00				
27	40.00		40.00	4/5/6	MARGARET KIZAT	40.00	M					40.00				
28	40.00		40.00	4/5/6	IVAN KIZAT	40.00	M					40.00				
29	40.00		40.00	4/5/6	IVAN KIZAT	40.00	M					40.00				
30																
T			21.50													

91040332821

CASH RECEIPTS JOURNAL

AD ON TOP PEG

1700608 K L M P I

	CHECKS	CASH	NET PAYMENT	DATE	NAME	BALANCE	DESCRIPTION		PAC CONTRIBUTIONS	300 CLUB	OFFICER CLUB	MEMBER SHIP	CHIEF JEFF JACK TOWERS	CHIEF JEFF JACK ADE	PRESIDENT'S CLUB	SPECIAL EVENTS	OTHER
F				7/16	JUN B. NIKKEL ✓	400.00	AI	1					400.00				
1				7/16	MAIEA E. NAKI ✓	400.00	AI	2					400.00				
2				7/16	MILTON GAPPY ✓	400.00	AI	3					400.00				
3				7/16	PAUL BASSETT ✓	400.00	AI	4					400.00				
4				7/16	HIKMAT M. LAMIA ✓	400.00	AI	5					400.00				
5				7/16	SEANATHA J. LAMIA ✓	400.00	AI	6					400.00				
6				7/16	ROMEL S. ✓	400.00	AI	7					400.00				
7				7/16	CHARL J. KUEH ✓	400.00	AI	8					400.00				
8				7/16	MICHAEL NAJIB ✓	400.00	AI	9					400.00				
9				7/16	GLENN THAUJE ✓	400.00	AI	10					400.00				
10				7/16	ZUHAR CAEMO ✓	400.00	AI	11					400.00				
11				7/16	FED CATARON ✓	400.00	AI	12					400.00				
12				7/16	SAMI JILAD ✓	400.00	AI	13					400.00				
13				7/16	MANUEL LALLABAT ✓	400.00	AI	14					400.00				
14				7/16	MICHAEL S. ✓	400.00	AI	15					400.00				
15				7/16	MAMI GAPPY ✓	400.00	AI	16					400.00				
16				7/16	SHAMIE GAPPY ✓	400.00	AI	17					400.00				
17				7/16	SHAMIE GAPPY ✓	400.00	AI	18					400.00				
18				7/16	SHAMIE GAPPY ✓	400.00	AI	19					400.00				
19				7/16	SHAMIE GAPPY ✓	400.00	AI	20					400.00				
20				7/16	SHAMIE GAPPY ✓	400.00	AI	21					400.00				
21				7/16	SHAMIE GAPPY ✓	400.00	AI	22					400.00				
22				7/16	SHAMIE GAPPY ✓	400.00	AI	23					400.00				
23				7/16	SHAMIE GAPPY ✓	400.00	AI	24					400.00				
24				7/16	SHAMIE GAPPY ✓	400.00	AI	25					400.00				
25				7/16	SHAMIE GAPPY ✓	400.00	AI	26					400.00				
26				7/16	SHAMIE GAPPY ✓	400.00	AI	27					400.00				
27				7/16	SHAMIE GAPPY ✓	400.00	AI	28					400.00				
28				7/16	SHAMIE GAPPY ✓	400.00	AI	29					400.00				
29				7/16	SHAMIE GAPPY ✓	400.00	AI	30					400.00				
30																	
T								T					11,900.00				

	CHECKS	CASH	NET PAYMENT	DATE	NAME	BALANCE	DESCRIPTION		PAY CONTRIB UTIONS	500 CLUB	PACIFIC CENTURY FUND	SENIOR MEMBER SHIPS	SENIOR JACK TICKETS	SENIOR JACK ADS	SENIOR JACK CLUB	SPECIAL EVENTS	BIN
F	400.00		400.00	7/3/10	PETER KEEA ✓	400.00	M	F					400.00				
1	100.00		100.00	7/3/10	FRANCES GOJI ✓	100.00	M	1A					200.00				
2	400.00		400.00	7/3/10	SUN COLINA ✓	400.00	M	2					400.00				
3	400.00		400.00	7/3/10	SHARLES ✓	400.00	M	3					400.00				
4	200.00		200.00	7/3/10	DAVE NONG ✓	200.00	M	4					200.00				
5	200.00		200.00	7/3/10	MARTIN VON ✓	200.00	M	5					200.00				
6	200.00		200.00	7/3/10	SEAN GAPP ✓	200.00	M	6					200.00				
7	100.00		100.00	7/3/10	MIKE ROBIN ✓	100.00	M	7					100.00				
8	100.00		100.00	7/3/10	MIKE ROBIN ✓	100.00	M	8					100.00				
9	100.00		100.00	7/3/10	MIKE ROBIN ✓	100.00	M	9					100.00				
10	100.00		100.00	7/3/10	MIKE ROBIN ✓	100.00	M	10					100.00				
11								11									
12								12									
13								13									
14								14									
15								15									
16								16									
17								17									
18								18									
19								19									
20								20									
21								21									
22								22									
23								23									
24								24									
25								25									
26								26									
27								27									
28								28									
29								29									
30								30									
T	3000.00		3000.00					T					5300.00				

4

118525.00

CASH PROOF: ON HAND
PAGE OF DAY

ALL CHECKS
+ AND CASH REC'D

___ - BANK DEPOSIT

ON HAND
= END OF DAY

PAGE NO.	
DATE	

2 2 3 3 0 3 3 4 0 0 1 0



6004156
RECEIVED
FEDERAL ELECTION COMMISSION
88 AUG 18 AM 10:12

5th District Democratic Committee

August 16, 1988

Mr. Lawrence M. Noble
General Counsel
Federal Election Commission
Washington, D. C. 20463

RE: MUR 2560 Fifth Congressional District Democratic Committee
and Donald Riger as Treasurer

Dear Mr. Noble:

I am advised by the Michigan Democratic Party that the information you requested in your letter of July 7, 1988 has been sent to you by Counsel for the Michigan Democratic Party Laurence B. Deitch. It is my understanding that this should be sufficient for the answering of Questions 1, 2, and 3.

I would like to elaborate somewhat further on the transfer of funds and the Fifth Congressional District Democratic Committee.

The Democrats in the fifth District have been the minority party for many, many years. I know for a fact that for only 2½ years out of the last 42 has a Democrat held that Congressional seat. The Officers of the Committee are all unpaid. Any position on the Committee, including the Treasurer, is a voluntary part time position.

After investigating the transfer I have found the following to be true to the best of my knowledge:

1. The Treasurer, Neil Dick, inadvertantly deposited the \$7000 check into the Federal Account.
2. The Treasurer who worked for the Architectural firm of Daverman Associates, which does work Internationally, was out of the country a short time after the deposit of the check. This may explain why the error was not discovered.
3. In making the deposit the Treasurer failed to advise the committee of the status of the transfer of funds and acted independently without the full knowledge of the Committee.

After the error became known the Committee went to considerable effort to correct the mistake. It did replenish the Administrative

RECEIVED
FEDERAL ELECTION COMMISSION
88 AUG 18 AM 11:54

Mr. Lawrence Noble-continued
page 2

Fund within a short period of time. If the committee had known of the error it would have acted promptly to correct it as it did when it had to replenish funds. Holding the Committee responsible considering the circumstances would be unfair. As I stated on March 30, 1988 we are willing to sign a conciliation agreement. I hope that you will give this further considerations.

If you have any further questions, please contact me.

Sincerely yours,

Donald Riger

Donald Riger
Treasurer
5th Congressional District
1709 Herrity Lane
Ionia, Michigan 48846

Subscribed and duly sworn to before me a Notary Public in and for the County of Ionia, State of Michigan, this 17th day of August, 1988.

Barbara A. Trierweiler

Barbara A. Trierweiler
Notary Public, Ionia Co., MI
Comm. Expires: Dec. 30, 1991

91040332824



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

FROM: *mwe* MARJORIE W. EMMONS/JOSHUA MCFADDEN *JM*

DATE: SEPTEMBER 21, 1988

SUBJECT: MUR 2560
COMPREHENSIVE INVESTIGATIVE REPORT #1
SIGNED SEPTEMBER 16, 1988

The above-captioned report was received in the Secretariat at 5:03 p.m. on Monday, September 19, 1988 and circulated to the Commission on a 24-hour no-objection basis at 11:00 a.m. on Tuesday, September 20, 1988.

There were no objections to the report.

21040332825

BEFORE THE FEDERAL ELECTION COMMISSION

88 SEP 19 PM 5:03

In the Matter of)
)
Fifth Congressional District)
Democratic Committee and Donald)
Riger, as treasurer)
Michigan Democratic State Central)
Committee and Laurence B. Deitch,)
as treasurer)

MUR 2560

SENSITIVE

COMPREHENSIVE INVESTIGATIVE REPORT #1

On December 8, 1987, the Commission found reason to believe that the Fifth Congressional District Democratic Committee and its treasurer (the "Committee")^{1/} violated 2 U.S.C. § 441b and 11 C.F.R. § 102.6(a)(1)(iv) by accepting a \$7,000 transfer from the Michigan Democratic State Central Committee (the "State Committee") and a \$1,000 transfer from the Barry County Democratic Committee. In responding to the Commission's finding, the Committee provided an affidavit stating the \$1,000 transfer from the Barry County Democratic Committee was made up of funds received from individuals and profits obtained from operating a bingo game only; there were no labor funds. However, the Committee indicated the \$7,000 transfer from the State Committee was a mistake. Because it was unclear whether this check was deposited in error,^{2/} the Commission found reason to believe that

^{1/} Neil A. Dick was the Committee's treasurer until July 20, 1987. Donald Riger was appointed the new treasurer on February 2, 1988.

^{2/} Michigan Election law allows political committees to maintain only one account. Consequently, the Committee was set up pursuant to federal election rules and regulations. The Committee had a different name, and its mailing address and treasurer were distinct from the Administrative Fund which was the Committee that could have accepted the \$7,000 transfer.

9104032326

the State Committee also violated 2 U.S.C. § 102.6(a)(1)(iv) on June 28, 1988. On that same date, the Commission also found reason to believe that, in addition to the two (2) other violations, the Committee violated 2 U.S.C. §§ 432(a) and 433(c) for not having a treasurer for over six (6) months and not filing an amended Statement of Organization within ten (10) days of the treasurer's resignation.

In order to demonstrate that there were no impermissible funds in the \$7,000 transfer to the Committee, the State Committee has submitted considerable documentation to the Office of the General Counsel. Once this Office has completed its examination of these accounting documents, we will submit our recommendations to the Commission concerning both committees.

Lawrence M. Noble
General Counsel

9/14/88
Date

BY: 
Lois G. Lerner
Associate General Counsel

Staff Assigned: Sandra J. Dunham

91040332327



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

FROM: *MW* MARJORIE W. EMMONS/JOSHUA MCFADDEN *JM*

DATE: DECEMBER 7, 1988

SUBJECT: MUR 2560
COMPREHENSIVE INVESTIGATIVE REPORT #2
SIGNED DECEMBER 5, 1988

The above-captioned report was received in the Secretariat at 10:10 a.m. on Tuesday, December 6, 1988 and circulated to the Commission on a 24-hour no-objection basis at 4:00 p.m. on Tuesday, December 6, 1988.

There were no objections to the report.

210403328

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
FEDERAL ELECTION COMMISSION

DEC -6 AM 10:10

In the Matter of)

Fifth Congressional District Democratic)
Committee and Donald Riger, as treasurer)
Michigan Democratic State Central)
Committee and Laurence B. Deitch, as)
treasurer)

MUR 2560

SENSITIVE

COMPREHENSIVE INVESTIGATIVE REPORT #2

In Comprehensive Investigative Report #1, this Office indicated that the Michigan Democratic State Central Committee (the "State Committee") had submitted considerable documentation concerning the make up of its account at the time that it made the \$7,000 transfer to the Fifth Congressional District Democratic Committee. However, the State Committee only submitted its receipts for the time in question, not any documentation of its disbursements. This Office telephoned the State Committee's treasurer and requested these additional documents. He indicated that he would send us these documents after the Thanksgiving holiday. This Office will submit our recommendations after reviewing both the receipts and disbursements of the State Committee.

Lawrence M. Noble
General Counsel

12-5-88
Date

BY:


Lois G. Lerner
Associate General Counsel

Staff Assigned: Sandra Dunham

21040032829

HAND DELIVERED 6C
RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM
1731

LAW OFFICES
SIMON, DEITCH, FRIEDMAN, SIEFMAN AND GREEN
A PROFESSIONAL CORPORATION

26911 NORTHWESTERN HIGHWAY, SUITE 400
POST OFFICE BOX 5073
SOUTHFIELD, MICHIGAN 48086

(313) 262-1600

TELECOPIER (313) 355-5830

89 FEB -3 AM 10:29

DAVID F. SIMON
LAURENCE B. DEITCH
RANDOLPH J. FRIEDMAN
JAY N. SIEFMAN
FRED B. GREEN
STEVEN G. SILVERMAN
BLAIR A. PERSON
JOHN A. HUBBARD
SHEREEN L. SILVER
DAVID H. FREEDMAN

LANSING OFFICE
200 NORTH CAPITOL
SUITE 500
LANSING, MICHIGAN 48933
(517) 482-3136

89 FEB -3 PM 3:26

February 2, 1989

Sandra Dunham, Esq.
Office of the General Counsel
Federal Election Commission
999 E Street, NW
Washington, D.C. 20463

VIA FEDERAL EXPRESS

Re: MUR 2560
Michigan Democratic State Central
Committee and Thomas Roach, as Treasurer

Dear Ms. Dunham:

This is in response to our telephone conversation of late November, 1988, at which time you indicated that your office might be favorably disposed to recommend to the Federal Election Commission that it drop the charges made against the Michigan Democratic State Central Committee (the "Committee") assuming receipt of the following:

1. Disbursement documentation for the month of October, 1986; and
2. A cover letter to the Fifth District, indicating that the \$7,000 check was to be deposited into the "Fifth District Administrative Account."

As you requested, I have enclosed the Committee's disbursement documentation for the period beginning October 1, 1986 and ending November 20, 1986. With regard to your request for a cover letter to the Fifth District, A review of our records indicates that none exists.

Given the substantial amount of "clean money" which was in the account in October, 1986 as compared to the expenditures for that month, I would hope that our lack of a cover letter would not prove problematic.

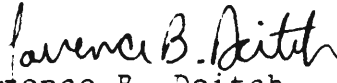
SIMON, DEITCH, FRIEDMAN, SIEFMAN AND GREEN

Sandra Dunham, Esq.
Office of the General Counsel
Federal Election Commission
February 2, 1989
Page Two

Should you be in need of further information or have any questions or comments regarding this matter, please do not hesitate to call me. We look forward to hearing from you.

Sincerely,

SIMON, DEITCH, FRIEDMAN, SIEFMAN AND GREEN
a Professional Corporation


Laurence B. Deitch

LBD/mbg:887

91-4033231

HAND DELIVEREDFEDERAL ELECTION COMMISSION
MAIL ROOM

89 FEB -9 PM 4:50

OCC 1787

- MWR 2560

LAW OFFICES
SIMON, DEITCH, FRIEDMAN, SIEFMAN AND GREEN
A PROFESSIONAL CORPORATION

26911 NORTHWESTERN HIGHWAY, SUITE 400

POST OFFICE BOX 5073

SOUTHFIELD, MICHIGAN 48066

(313) 262-1600

TELECOPIER (313) 355-5830

DAVID R. SIMON
LAURENCE B. DEITCH
RANDOLPH J. FRIEDMAN
JAY N. SIEFMAN
FRED B. GREEN
STEVEN C. SILVERMAN
BLAIR A. PERSON
JOHN A. HUBBARD
SHARON L. SILVER
DAVID H. FRIEDMANLANSING OFFICE
300 NORTH CAPITOL
SUITE 500
LANSING, MICHIGAN 48933
(313) 462-3136**TELECOPIER COVER LETTER**

PLEASE DELIVER THE FOLLOWING PAGE(S) TO:

TO: Sandra DunhamOffice of the General CounselCITY: Washington, D.C.TELECOPIER NUMBER: (202) 376-5280FROM: Laurence B. DeitchTOTAL NUMBER OF PAGES INCLUDING THIS PAGE: 8**COMMENTS:**

This is the enclosure to our letter of February 2, 1989.

Date: 2/09/89IF YOU ARE MISSING ANY PAGES, PLEASE CALL (313) 262-1600.
THANK YOU.

ITEMIZED DISBURSEMENTS

Use separate schedule(s)
for each category of the
Detailed Summary PagePAGE 1 OF 1
FOR LINE NUMBER 21

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

NAME OF COMMITTEE (in Full)

Democratic Campaign Committee

2104033333

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Contribution	Date (month, day, year)	Amount of Each Disbursement This Period
Democratic Congressional Campaign Committee Washington, D.C. 20003	Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	11/7/86	5,000.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only)

5,000.00

ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE
(2 U.S.C. § 441a(d))

(To be used only by Political Committees in the General Election)

Name of Political Committee (In Full)				
Democratic Campaign Committee				
Has your Committee been designated to make coordinated expenditures by a political party committee? ☒ YES ☐ NO				
If YES, name the designating committee:				
Full Name, Mailing Address and ZIP Code of Subordinate Committee				
Democratic Campaign Committee 8100 East Jefferson Detroit, MI 48214				
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
All Star Printing 116 S. Larch Lansing, MI 48912	Donald Albosta 10th Cong. District Michigan	Printing	10/24/86	5,122.71
Aggregate General Election Expenditure for this Candidate—\$ 8,122.71				
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
Technicom Graphics, Inc. 2217 Franklin Detroit, MI 48207	Donald Albosta 10th Cong. District Michigan	Apply Labels sort, tie and bag for lit. mailing	10/24/86 11/17/86	1,265.00 8.19
Aggregate General Election Expenditure for this Candidate—\$ 9,395.90				
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
Market Resource 200 Ren Cen Ste. 1230 Detroit, MI 48243	Donald Albosta 10th Cong. District Michigan	Label Production for Mailing	10/24/86	537.84
Aggregate General Election Expenditure for this Candidate—\$ 9,933.74				
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
Postmaster-Detroit Detroit, MI	Donald Albosta 10th Cong. District Michigan	Postage-Bulk	10/24/86	8,025.00
Aggregate General Election Expenditure for this Candidate—\$ 17,958.74				
SUBTOTAL of Expenditures This Page (optional)				
TOTAL This Period (last page this line number only)				14,958.74

210403334

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

(Summary Page)

1. Name of Committee (in Full) Democratic Campaign Committee Address (Number and Street) 8100 E. Jefferson City, State and ZIP Code Detroit, MI 48214 ☐ Check here if address is different than previously reported. 2. FEC Identification Number C00031054 3. ☐ This committee qualified as a multicandidate committee during this Reporting Period on _____ (Date)	4. TYPE OF REPORT (Check appropriate boxes) (a) ☐ April 15 Quarterly Report ☐ October 15 Quarterly Report ☐ July 15 Quarterly Report ☐ January 31 Year End Report ☐ July 31 Mid Year Report (Non-Election Year Only) ☐ Monthly Report for _____ ☒ Twelfth day report preceding <u>General</u> (Type of Election) election on <u>11/4/86</u> in the State of <u>Michigan</u> ☐ Thirtieth day report following the General Election on _____ in the State of _____ ☐ Termination Report (b) Is this Report an Amendment? ☐ YES ☒ NO
--	--

SUMMARY

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period <u>1 October 86</u> through <u>15 October 86</u>		
6 (a) Cash on hand January 1, 19 <u>86</u>		\$ 1,110.57
(b) Cash on Hand at Beginning of Reporting Period	\$ 7,470.79	
(c) Total Receipts (from Line 18)	\$ 10.00	\$ 77,845.22
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 7,470.79	\$ 78,955.79
7. Total Disbursements (from Line 28)	\$ 4,000.00	\$ 75,485.00
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 3,470.79	\$ 3,470.79
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)	\$ 2,500.00	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$	

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

Richard Wiener

Type or Print Name of Treasurer



SIGNATURE OF TREASURER

16 October 1986

Date

For further information contact:

Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463
Toll Free 800-424-9630
Local 202-376-3120

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

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used.

--	--	--	--	--	--	--	--	--	--

FEC FORM 3X (3/80)

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

NAME OF COMMITTEE (in Full)

Democratic Campaign Committee

A. Full Name, Mailing Address and ZIP Code Dennis Hertel for Congress Committee 22805 Kelly Rd. East Detroit, MI 48021	Purpose of Disbursement Contribution MI 14th Cong. Dist. FO/10/86 Disbursement for: ☐ Primary ☒ General ☐ Other (specify)	Date (month, day, year) FO/10/86	Amount of Each Disbursement This Period \$1000.00
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
TOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			\$1000.00

ITEMIZED COORDINATED EXPENDITURES MADE BY
POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)
ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE
(2 U.S.C. §441a(d))

(To be used only by Political Committees in the General Election)

Name of Political Committee (in Full) Democratic Campaign Committee				
Has your Committee been designated to make coordinated expenditures by a political party committee? ☐ YES ☐ NO If YES, name the designating committee:				
Full Name, Mailing Address and ZIP Code of Subordinate Committee Democratic Campaign Committee 8100 E. Jefferson Detroit, MI 48214				
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
Analysis Group, Inc. P.O. Box 9317 New Haven, CT 06533	Donald Albosta 10th Cong. Dist. Michigan	Poll	10/2/86	\$3000.00
	Aggregate General Election Expenditure for this Candidate—\$3000.00			
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
	Aggregate General Election Expenditure for this Candidate—\$			
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
	Aggregate General Election Expenditure for this Candidate—\$			
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
	Aggregate General Election Expenditure for this Candidate—\$			
SUBTOTAL of Expenditures This Page (optional)				
TOTAL This Period (last page this line number only)				\$3000.00

210403337

HAND DELIVERED

FEDERAL BUREAU OF INVESTIGATION
MAIL ROOM

89 FEB -9 PM 4:50

LAW OFFICES
SIMON, DEITCH, FRIEDMAN, SIEFMAN AND GREEN

A PROFESSIONAL CORPORATION

26911 NORTHWESTERN HIGHWAY, SUITE 400

POST OFFICE BOX 5073

SOUTHFIELD, MICHIGAN 48066

(313) 262-1600

TELECOPIER (313) 355-5839

DAVID R. SIMON
LAURENCE B. DEITCH
RANDOLPH J. FRIEDMAN
JAY N. SIEFMAN
FRED B. GREEN
STEVEN G. SILVERMAN
BLAIR A. PERSON
JOHN A. HUBBARD
SHARON L. SILVER
DAVID H. FREEDMANLANSING OFFICE
300 NORTH CAPITOL
SUITE 500
LANSING, MICHIGAN 48933
(313) 482-3136TELECOPIER COVER LETTER

PLEASE DELIVER THE FOLLOWING PAGE(S) TO:

TO: Sandra DunhamOffice of the General CounselCITY: Washington, D.C.TELECOPIER NUMBER: (202) 376-5280FROM: Laurence B. DeitchTOTAL NUMBER OF PAGES INCLUDING THIS PAGE: 8

COMMENTS:

This is the enclosure to our letter of February 2, 1989.

Date: 2/09/89IF YOU ARE MISSING ANY PAGES, PLEASE CALL (313) 262-1600.
THANK YOU.

21040332338

ITEMIZED DISBURSEMENTS

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

PAGE	OF
1	1
FOR LINE NUMBER	
21	

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

NAME OF COMMITTEE (in Full)

Democratic Campaign Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Democratic Congressional Campaign Committee Washington, D.C. 20003	Contribution Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	11/7/86	5,000.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only)

5,000.00

0104033339

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

(Summary Page)

1. Name of Committee (in Full) Democratic Campaign Committee Address (Number and Street) 8100 E. Jefferson City, State and ZIP Code Detroit, MI 48214 ☐ Check here if address is different than previously reported. 2. FEC Identification Number C00031054 3. ☐ This committee qualified as a multicandidate committee during this Reporting Period on _____ (Date)	4. TYPE OF REPORT (Check appropriate boxes) (a) ☐ April 15 Quarterly Report ☐ October 15 Quarterly Report ☐ July 15 Quarterly Report ☐ January 31 Year End Report ☐ July 31 Mid Year Report (Non-Election Year Only) ☐ Monthly Report for _____ ☐ Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____ ☒ Thirtieth day report following the General Election on <u>Nov. 4</u> in the State of <u>Michigan</u> ☐ Termination Report (b) Is this Report an Amendment? ☐ YES ☒ NO
--	---

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period <u>10/16/86</u> through <u>11/20/86</u>			
6. (a) Cash on hand January 1, 19 <u>86</u>			\$ 1,110.57
(b) Cash on Hand at Beginning of Reporting Period		\$ 3,470.79	
(c) Total Receipts (from Line 18)		\$ 39,000.00	\$ 116,845.22
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)		\$ 42,470.79	\$ 117,955.79
7. Total Disbursements (from Line 28)		\$ 37,472.74	\$ 112,957.74
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))		\$ 4,998.05	\$ 4,998.05
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)		\$ 2,500.00	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)		\$	

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

Richard Wiener

Type or Print Name of Treasurer



SIGNATURE OF TREASURER

11/3/86

Date

For further information contact:

Federal Election Commission
800 E Street, N.W.
Washington, D.C. 20463
Toll Free 800-424-6530
Local 202-376-3120

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

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used.

--	--	--	--	--	--	--	--	--	--

FEC FORM 3X (3/80)

ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE
(2 U.S.C. §441a(d))

(To be used only by Political Committees in the General Election)

Name of Political Committee (in Full)				
Democratic Campaign Committee				
Has your Committee been designated to make coordinated expenditures by a political party committee? ☐ YES ☒ NO				
If YES, name the designating committee:				
Full Name, Mailing Address and ZIP Code of Subordinate Committee				
Democratic Campaign Committee 8100 East Jefferson Detroit, MI 48214				
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
All Star Printing 116 S. Larch Lansing, MI 48912	Donald Albosta 10th Cong. District Michigan	Printing	10/24/86	5,122.71
Aggregate General Election Expenditure for this Candidate—\$ 8,122.71				
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
Technicom Graphics, Inc. 2217 Franklin Detroit, MI 48207	Donald Albosta 10th Cong. District Michigan	Apply Labels sort, tie and bag for lit. mailing	10/24/86 11/17/86	1,265.00 8.19
Aggregate General Election Expenditure for this Candidate—\$ 9,395.90				
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
Market Resource 200 Ren Cen Ste. 1230 Detroit, MI 48243	Donald Albosta 10th Cong. District Michigan	Label Production for Mailing	10/24/86	537.84
Aggregate General Election Expenditure for this Candidate—\$ 9,933.74				
Full Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported, State, District & Office Sought	Purpose of Expenditure	Date (month, day, year)	Amount
Postmaster-Detroit Detroit, MI	Donald Albosta 10th Cong. District Michigan	Postage-Bulk	10/24/86	8,025.00
Aggregate General Election Expenditure for this Candidate—\$ 17,958.74				
SUBTOTAL of Expenditures This Page (optional)				
TOTAL This Period (last page this line number only)				14,958.74

010403341

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

(Summary Page)

1. Name of Committee (In Full) Democratic Campaign Committee		4. TYPE OF REPORT (Check appropriate boxes)	
Address (Number and Street) 8100 E. Jefferson		☐ April 15 Quarterly Report ☐ October 15 Quarterly Report	
City, State and ZIP Code Detroit, MI 48214		☐ July 15 Quarterly Report ☐ January 31 Year End Report	
☐ Check here if address is different than previously reported.		☐ July 31 Mid Year Report (Non-Election Year Only)	
2. FEC Identification Number C00031054		☐ Monthly Report for _____	
3. ☐ This committee qualified as a multicandidate committee during this Reporting Period on _____ (Date)		☒ Twelfth day report preceding General <u>General</u> (Type of Election) election on <u>11/4/86</u> in the State of <u>Michigan</u>	
		☐ Thirtieth day report following the General Election on _____ in the State of _____	
		☐ Termination Report	
		(b) Is this Report an Amendment? ☐ YES ☒ NO	

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period	<u>1 October 86</u> through <u>15 October 86</u>		
6. (a) Cash on hand January 1, 19 <u>86</u>			\$ 1,110.57
(b) Cash on Hand at Beginning of Reporting Period		\$ 7,470.79	
(c) Total Receipts (from Line 18)		\$ 10.00	\$ 77,845.22
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)		\$ 7,470.79	\$ 78,955.79
7. Total Disbursements (from Line 28)		\$ 4,000.00	\$ 75,485.00
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))		\$ 3,470.79	\$ 3,470.79
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)		\$ 2,500.00	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)		\$	

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

Richard Wiener
Type or Print Name of Treasurer

SIGNATURE OF TREASURER

16 October 1986
Date

For further information contact:

Federal Election Commission
980 E Street, N.W.
Washington, D.C. 20463
Toll Free 800-424-9530
Local 202-376-3120

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

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used.

--	--	--	--	--	--	--	--	--	--

FEC FORM 3X (3/80)

ITEMIZED DISBURSEMENTS

Use separate schedule(s) for each category of the Disbursement Summary Page

1 1
FOR LINE NUMBER
19

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

NAME OF COMMITTEE (in Full)

Democratic Campaign Committee

A. Full Name, Mailing Address and ZIP Code Michigan Democratic Party 606 Townsend Lansing, MI 48933	Purpose of Disbursement Administrative Exp. Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 10/21/86 10/28/86 11/4/86	Amount of Each Disbursement This Period 14,000.00 1,500.00 2,000.00
B. Full Name, Mailing Address and ZIP Code Federal Express Detroit, MI 48214	Purpose of Disbursement Operating Expenses Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 10-20-86	Amount of Each Disbursement This Period 14.00
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only)

17,514.00

2104033343

PORT OF RECEIPTS AND DISBURSEMENTS Political Committee Other Than an Authorized Committee

(Summary Page)

1. Name of Committee (in Full) Democratic Campaign Committee Address (Number and Street) 8100 E. Jefferson City, State and ZIP Code Detroit, MI 48214 ☐ Check here if address is different than previously reported. 2. FEC Identification Number C00031054 3. ☐ This committee qualified as a multicandidate committee during this Reporting Period on _____ (Date)	4. TYPE OF REPORT (Check appropriate boxes) (a) ☐ April 15 Quarterly Report ☐ October 15 Quarterly Report ☐ July 15 Quarterly Report ☐ January 31 Year End Report ☐ July 31 Mid Year Report (Non-Election Year Only) ☐ Monthly Report for _____ ☐ Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____ ☒ Thirtieth day report following the General Election on Nov. 4 in the State of Michigan ☐ Termination Report (b) Is this Report an Amendment? ☐ YES ☒ NO
--	---

SUMMARY	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period <u>10/16/86</u> through <u>11/20/86</u>		
6. (a) Cash on hand January 1, 19 <u>86</u>		\$ 1,110.57
(b) Cash on Hand at Beginning of Reporting Period	\$ 3,470.79	
(c) Total Receipts (from Line 18)	\$ 39,000.00	\$ 116,845.22
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 42,470.79	\$ 117,955.79
7. Total Disbursements (from Line 28)	\$ 37,472.74	\$ 112,957.74
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 4,998.05	\$ 4,998.05
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)	\$ 2,500.00	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$	

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

Richard Wiener

Type or Print Name of Treasurer

SIGNATURE OF TREASURER

11/3/86

Date

For further information contact:

Federal Election Commission
800 E Street, N.W.
Washington, D.C. 20463
Toll Free 800-424-9630
Local 202-376-3120

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 3e are obsolete and should no longer be used.

--	--	--	--	--	--	--	--	--	--

FEC FORM 3X (3/80)

2104033344

BEFORE THE FEDERAL ELECTION COMMISSION

FEDERAL ELECTION COMMISSION
SECRETARIAT
JUN 15 AM 11:38

In the Matter of)

Fifth Congressional District)
Democratic Committee and)
Donald Riger, as treasurer)

MUR 2560

Michigan Democratic State)
Central Committee and)
Laurence B. Deitch, as)
treasurer)

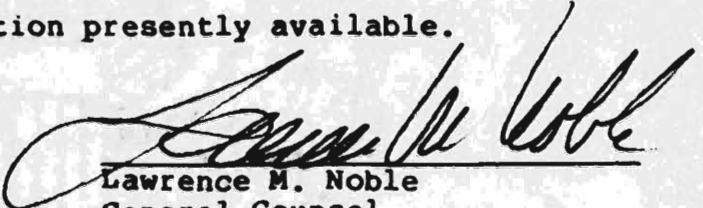
SENSITIVE

GENERAL COUNSEL'S REPORT

The Office of the General Counsel is prepared to close the investigation in this matter as to the Michigan Democratic State Central Committee and Laurence B. Deitch, as treasurer, based on the assessment of the information presently available.

Date

6/16/89


Lawrence M. Noble
General Counsel

21040332345



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT

90 JAN 18 PM 3:03

SENSITIVE

MEMORANDUM

January 18, 1990

TO: The Commission

FROM: Lawrence M. Noble *h*
General Counsel

SUBJECT: MUR 2560

Attached for the Commission's review are two briefs stating the position of the General Counsel on the legal and factual issues of the above-captioned matter. Copies of these briefs and letters notifying the respondents of the General Counsel's intent to recommend to the Commission findings of no probable cause to believe were mailed on January 18, 1990. Following receipt of the respondents' replies to these notices, this Office will make a further report to the Commission.

Attachments

1. Briefs (2)
2. Letters to respondents (2)

9104032346



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 18, 1990

Donald Riger, Treasurer
Fifth Congressional District
Democratic Committee
1709 Herrity Lane
Ionia, MI 48846

RE: MUR 2560
Fifth Congressional
District Democratic
Committee and Donald
Riger, as treasurer

Dear Mr. Riger:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, and information supplied by you, on December 8, 1987, the Federal Election Commission found reason to believe that the Fifth Congressional District Democratic Committee ("Committee") and you, as treasurer, violated 2 U.S.C. § 441b and 11 C.F.R. § 102.6(a)(1)(iv), and instituted an investigation in this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that violations have occurred.

The Commission may or may not approve the General Counsel's recommendation. Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within 15 days of your receipt of this notice, you may file with the Secretary of the Commission a brief (ten copies if possible) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of the General Counsel, if possible.) The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of whether there is probable cause to believe a violation has occurred.

21040332347

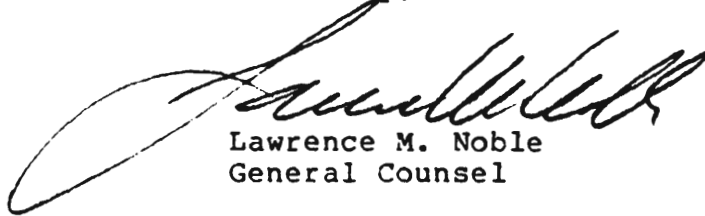
Donald Riger
Page 2

If you are unable to file a responsive brief within 15 days, you may submit a written request for an extension of time. All requests for extensions of time must be submitted in writing five days prior to the due date, and good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

A finding of probable cause to believe requires that the Office of the General Counsel attempt for a period of not less than 30, but not more than 90 days, to settle this matter through a conciliation agreement.

Should you have any questions, please contact Sandra J. Dunham, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Brief

2104033348

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Fifth Congressional District) MUR 2560
Democratic Committee and Donald)
Riger, as treasurer)
)

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

On December 8, 1987, the Commission found reason to believe that the Fifth Congressional District Democratic Committee (the "Committee") and its treasurer,^{1/} had violated 2 U.S.C. § 441b and 11 C.F.R. § 102.6(a)(1)(iv) by accepting a \$7,000 transfer from the Michigan Democratic State Central Committee (the "State Committee") and a \$1,000 transfer from the Barry County Democratic Committee.^{2/}

II. ANALYSIS

Michigan election law requires political committees to maintain only one account. Consequently, the Committee is the entity established and maintained by the Fifth Congressional District of the Democratic Party to finance its political activity in connection with federal elections. The Committee operates in conjunction with an administrative committee under

1/ Neil A. Dick was the Committee's treasurer until July 20, 1987. Donald Riger was appointed the new treasurer on February 2, 1988.

2/ On June 28, 1988, the Commission found reason to believe that the Committee had violated 2 U.S.C. §§ 432(a) and 433(c) by failing to have a treasurer for more than six months and by failing to amend its Statement of Organization in a timely fashion. These violations are addressed in a General Counsel's Report being separately circulated to the Commission.

the name of Fifth District Democratic Administrative Fund (the "Administrative Fund") which finances non-federal political activity. These two committees have different treasurers and mailing addresses. The Michigan Democratic Party also has two committees, the Democratic Campaign Committee (the "Campaign Committee") to finance federal activities and the State Committee to administer its non-federal activity. Both the Committee and the Democratic Campaign Committee are registered with the Federal Election Commission.

11 C.F.R. § 102.6(a)(1)(ii) states that transfers of funds may be made without limit on amount between or among State party committees and subordinate party committees whether or not they are political committees under the Federal Election Campaign Act (the "Act") and whether or not such committees are affiliated. Therefore, the State Committee was permitted to transfer unlimited amounts to the Committee.

However, pursuant to 11 C.F.R. § 102.6(a)(1)(iv), transfers between State party committees and subordinate party committees can only be made from funds which are permissible under the Act. Both the Administrative Fund and the State Committee are non-federal entities. Because Michigan law permits labor unions to contribute to state political committees, the Commission found reason to believe the Committee violated 2 U.S.C. § 441b and 11 C.F.R. § 102.6(a)(1)(iv) when the State Committee transferred \$7,000 to the Committee on October 29, 1986.

In responding to the Commission's finding, the Committee

provided an affidavit stating the \$1,000 transfer from the Barry County Democratic Committee was made up of funds received from individuals and profits obtained from operating a bingo game only; there were no labor funds. However, the Committee indicated the deposit of the \$7,000 transfer from the non-federal State Committee into its account was a mistake. This statement was supported by the fact that the Committee had transferred all of the \$7,000 to the Administrative Fund by June 20, 1987.

The Office of the General Counsel has obtained considerable documentation from the State Committee concerning the \$7,000 transfer to the Committee, including a copy of the \$7,000 check. A review of the check did not clarify whether the \$7,000 had, in fact, been intended for the Administrative Fund and misdeposited into the Committee's account because the check was not made payable to either the federal or the non-federal committee. Rather, it was made payable to the 5th District Democratic Party. There is no committee which goes by this name.

The numerous accounting documents received from the State Committee set forth the makeup of the contributions placed in the State Committee's checking account during the month of October, 1986, the month of the \$7,000 transfer. The documents clearly show that funds from labor organizations were placed in the checking account during that month. However, the State Committee has been able to demonstrate through daily deposit ledgers that there were sufficient contributions from individuals in the account on October 29, 1986, (the date on the transfer check) to

cover the \$7,000 transfer. Specifically, the State Committee received \$28,084.50 solely from individuals on October 29, 1986, an amount which more than covered the \$7,000 transfer.

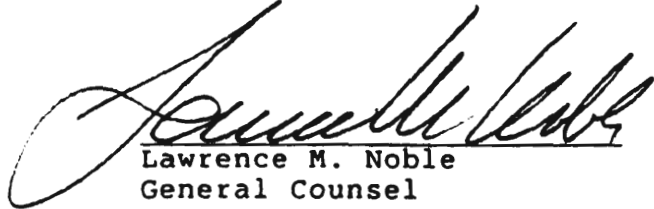
Because the State Committee has been able to demonstrate that there were sufficient funds from individuals in the account on the date of the transfer, this Office recommends that the Commission find no probable cause to believe that the Committee violated 2 U.S.C. § 441b and 11 C.F.R. § 102.6(a)(1)(iv).

III. GENERAL COUNSEL'S RECOMMENDATION

1. Find no probable cause to believe that the Fifth Congressional District Democratic Committee and Donald Riger, as treasurer, violated 2 U.S.C. § 441b and 11 C.F.R. § 102.6(a)(1)(iv).

Date

1/17/90


Lawrence M. Noble
General Counsel



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Laurence B. Deitch, Esquire
Simon, Deitch, Friedman & Siefman and Green
26911 Northwestern Highway
Suite 400, P.O. Box 5073
Southfield, MI 48086

RE: MUR 2560
Michigan Democratic State
Central Committee and
Laurence B. Deitch, as treasurer

Dear Mr. Deitch:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, on June 28, 1988, the Federal Election Commission found reason to believe that the Michigan Democratic State Central Committee ("Committee") and you, as treasurer, violated 2 U.S.C. § 441b and 11 C.F.R. § 102.6(a)(1)(iv), and instituted an investigation in this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find no probable cause to believe that violations have occurred.

The Commission may or may not approve the General Counsel's recommendation. Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within 15 days of your receipt of this notice, you may file with the Secretary of the Commission a brief (ten copies if possible) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of the General Counsel, if possible.) The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of whether there is probable cause to believe a violation has occurred.

21040332353

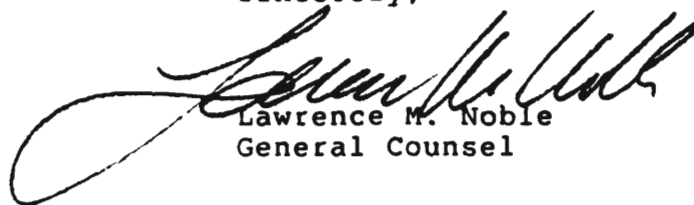
Laurence B. Deitch
Page 2

If you are unable to file a responsive brief within 15 days, you may submit a written request for an extension of time. All requests for extensions of time must be submitted in writing five days prior to the due date, and good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

A finding of probable cause to believe requires that the Office of the General Counsel attempt for a period of not less than 30, but not more than 90 days, to settle this matter through a conciliation agreement.

Should you have any questions, please contact Sandra J. Dunham, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Brief

9104033354

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Michigan Democratic State Central
Committee and Laurence B. Deitch,
as treasurer

)
)
)
)
)
)

MUR 2560

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

On December 8, 1987, the Commission found reason to believe that the Michigan Democratic State Central Committee (the "State Committee") and Laurence B. Deitch, as treasurer, violated 2 U.S.C. § 441b and 11 C.F.R. § 102.6(a)(1)(iv) by making a \$7,000 transfer to the Fifth Congressional District Democratic Committee (the "Committee"). The State Committee is a non-federal entity.

II. ANALYSIS

Michigan election law requires political committees to maintain only one account. Consequently, the Committee is the entity established and maintained by the Fifth Congressional District of the Democratic Party to finance its political activity in connection with federal elections. The Committee operates in conjunction with an administrative committee under the name of Fifth District Democratic Administrative Fund (the "Administrative Fund") which finances non-federal political activity. These two committees have different treasurers and mailing addresses. The Michigan Democratic Party also has two committees, the Democratic Campaign Committee (the "Campaign Committee") to finance federal activities and the State Committee

210403355

to administer its non-federal activity. Both the Committee and the Democratic Campaign Committee are registered organizations with the Federal Election Commission.

11 C.F.R. § 102.6(a)(1)(ii) states that transfers of funds may be made without limit on amount between or among State party committees and subordinate party committees whether or not they are political committees under the Act and whether or not such committees are affiliated. Therefore, the State Committee was permitted to transfer unlimited amounts to the Committee.

However, pursuant to 11 C.F.R. § 102.6(a)(1)(iv), transfers between State party committees and subordinate party committees can only be made from funds which are permissible under the Federal Election Campaign Act (the "Act"). Both the Administrative Fund and the State Committee are non-federal entities. Because Michigan law permits labor unions to contribute to State political committees, the Commission found reason to believe the State Committee violated 2 U.S.C. § 441b and 11 C.F.R. § 102.6(a)(1)(iv) when it transferred \$7,000 to the Committee on October 29, 1986.

The Committee stated that the deposit of the \$7,000 transfer from the State committee into its account was a mistake. This statement was supported by the fact that the Committee had transferred all of the \$7,000 to the Administrative Fund by June 20, 1987.

In responding to the Commission's reason to believe finding, the State Committee sent the Office of the General Counsel considerable documentation concerning its \$7,000 transfer to the

Committee, including a copy of the \$7,000 check. A review of the check did not clarify whether the \$7,000 had, in fact, been intended for the Administrative Fund and misdeposited into the Committee's account because the check was not made payable to either the federal or the non-federal committee. Rather, it was made payable to the 5th District Democratic Party. There is no committee which goes by this name.

The numerous accounting documents referenced from the State Committee set forth the makeup of the contributions placed in the State Committee's checking account during the month of October, 1986, the month of the \$7,000 transfer. The documents clearly show that funds from labor organizations were placed in the checking account during that month. However, the State Committee has been able to demonstrate through daily deposit ledgers that there were sufficient contributions from individuals in the account on October 29, 1986, (the date on the transfer check) to cover the \$7,000 transfer. Specifically, the State Committee received \$28,084.50 solely from individuals on October 29, 1986, an amount which more than covered the \$7,000 transfer.

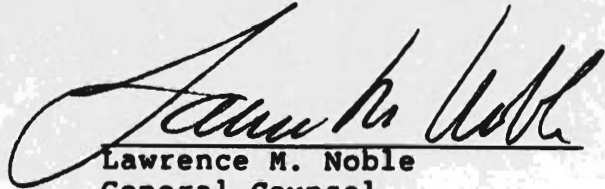
Because the State Committee has been able to demonstrate that there were sufficient funds from individuals in the account on the date of the transfer, this Office recommends that the Commission find no probable cause to believe that the State Committee violated 2 U.S.C. § 441b and 11 C.F.R. § 102.6(a)(1)(iv).

III. GENERAL COUNSEL'S RECOMMENDATIONS

1. Find no probable cause to believe that the Michigan Democratic State Central Committee and Laurence B. Deitch, as treasurer, violated 2 U.S.C. § 441b and 11 C.F.R. § 102.6(a)(1)(iv).

Date

1/17/90


Lawrence M. Noble
General Counsel

21040332358

90 JAN 18 AM 8:55

BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of)

Fifth Congressional District)
Democratic Committee and Donald)
Riger, as treasurer)

MUR 2560

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On December 8, 1987, the Commission found reason to believe that the Fifth Congressional District Democratic Committee and Neil A. Dick, as treasurer, (the "Committee") violated 2 U.S.C. § 441b and 11 C.F.R. § 102.6(a)(1)(iv) by accepting a \$7,000 transfer from the Michigan Democratic State Central Committee (the "State Committee") and a \$1,000 transfer from the Barry County Democratic Committee.^{1/} Neil A. Dick responded to the Commission's findings on December 28, 1987, and stated that he had resigned as treasurer on July 20, 1987.

The Committee's 1987 Year End Report was sent to the Commission on February 2, 1988.^{2/} Included with the report was a cover letter indicating Donald Riger was the new treasurer. Consequently, this Office sent a letter to Mr. Riger setting forth all of the responses received to date concerning this

^{1/} The apparent violations of 2 U.S.C. § 441b and 11 C.F.R. § 102.6(a)(1)(iv) are discussed in the recently circulated General Counsel's Briefs in this matter. This Office is recommending findings of no probable cause to believe these provisions have been violated.

^{2/} This report was the only report that the Committee had to file in the period from the date of Mr. Dick's resignation to the appointment of Mr. Riger.

2104032359

matter and enclosing a copy of the Factual and Legal Analysis for his information. On March 17, 1988, Mr. Riger responded to the letter and requested pre-probable cause conciliation. (Attachment 1).

On June 28, 1988, the Commission declined to enter into conciliation prior to a finding of probable cause to believe with the Committee in order to investigate further the 2 U.S.C. § 441b and 11 C.F.R. § 102.6(a)(1)(iv) violations. On the same date, the Commission found reason to believe that the Committee had violated 2 U.S.C. §§ 432(a) and 433(c). In a letter dated August 16, 1988, Mr. Riger referenced the responses provided by the State Committee and indicated the Committee was still interested in conciliation. (Attachment 2).

II. ANALYSIS

Pursuant to 2 U.S.C. § 432(a), every political committee shall have a treasurer. No contribution or expenditure shall be accepted, or made by or on behalf of, a political committee during any period in which the office of treasurer is vacant. In the present matter, even though the 1987 Year End Report filed by the Committee indicates that there were neither contributions received nor expenditures made during the period of time that the Committee did not have a treasurer, the Committee violated 2 U.S.C. § 432(a) by not having a treasurer for over six (6) months.

Under 2 U.S.C. § 433(c), all political committees are required to report to the Commission any change in information previously submitted in a Statement of Organization no later than

ten (10) days after the date of the change. Mr. Dick resigned his position as treasurer on July 15, 1987. Mr. Riger informed the Commission that he was the new treasurer in a cover letter sent with the 1987 Year End Report which was dated February 2, 1988. Because the Committee did not amend its Statement of Organization within ten (10) days of Mr. Dick's resignation, the Committee violated 2 U.S.C. § 433(c).

III. DISCUSSION OF CONCILIATION PROVISIONS AND CIVIL PENALTY

IV. RECOMMENDATIONS

1. Enter into conciliation with Fifth Congressional District Democratic Committee and Donald Riger, as treasurer.
2. Approve and send the attached proposed conciliation agreement and letter.

Lawrence M. Noble
General Counsel

Date

1/17/90

BY:


Lois G. Lerner
Associate General Counsel



FEDERAL ELECTION COMMISSION

WASHINGTON, D C 20463

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/DELORES HARRIS
COMMISSION SECRETARY

DATE: JANUARY 22, 1990

SUBJECT: MUR 2560 - GENERAL COUNSEL'S REPORT
DATED JANUARY 17, 1990

The above-captioned document was circulated to the Commission on Thursday, January 18, 1990 at 11:00 a.m.

Objection(s) have been received from the Commissioner(s)
as indicated by the name(s) checked below:

Commissioner Aikens	XXXX
Commissioner Elliott	
Commissioner Josefiak	
Commissioner McDonald	
Commissioner McGarry	
Commissioner Thomas	

This matter will be placed on the meeting agenda for Tuesday, January 30, 1990.

Please notify us who will represent your Division before the Commission on this matter.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Fifth Congressional District
Democratic Committee and Donald Riger, as
treasurer

)
) MUR 2560
)
)
)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the
Federal Election Commission executive session on January 30,
1990, do hereby certify that the Commission decided by a
vote of 6-0 to take the following actions in MUR 2560:

1. Enter into conciliation with Fifth
Congressional District Democratic
Committee and Donald Riger, as treasurer.
2. Approve and send the proposed conciliation
agreement and letter attached to the General
Counsel's report dated January 17, 1990.

Commissioners Aikens, Elliott, Josefiak, McDonald,
McGarry, and Thomas voted affirmatively for the decision.

Attest:

Jan 31, 1990
Date

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



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

February 12, 1990

Donald Riger, Treasurer
Fifth Congressional District
Democratic Committee
1709 Herrity Lane
Ionia, MI 48846

RE: MUR 2560
Fifth Congressional
District Democratic
Committee and Donald
Riger, as treasurer

Dear Mr. Riger:

On June 28, 1988, the Federal Election Commission found reason to believe that the Fifth Congressional District Democratic Committee and you, as treasurer, violated 2 U.S.C. §§ 432(a) and 433(c). At your request, on January 30, 1990, the Commission determined to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible.

If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact

21040332364

Donald Riger
Page 2

Sandra J. Dunham, the staff member assigned to this matter, at
(202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: 
Lois G. Lerner
Associate General Counsel

Enclosure
Conciliation Agreement

40332365

90 MAR 28 PM 3:50

BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

EXECUTIVE SESSION

APR 10 1990

In the Matter of)
)
Fifth Congressional District)
Democratic Committee and Donald)
Riger, as treasurer and)
Michigan Democratic State Central)
Committee and Laurence B. Deitch,)
as treasurer)

MUR 2560

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On December 8, 1987, the Commission found reason to believe that the Fifth Congressional District Democratic Committee (the "Committee") and its treasurer,¹ had violated 2 U.S.C. § 441b and 11 C.F.R. § 102.6(a)(1)(iv) by accepting a \$7,000 transfer from the Michigan Democratic State Central Committee (the "State Committee") and a \$1,000 transfer from the Barry County Democratic Committee. On June 28, 1988, the Commission found reason to believe that the Committee had additionally violated 2 U.S.C. §§ 432(a) and 433(c) by failing to have a treasurer for more than six months and by failing to amend its Statement of Organization in a timely fashion. On the same date, the Commission also found reason to believe that the State Committee and Laurence B. Deitch, as treasurer, violated 2 U.S.C. § 441b and 11 C.F.R. § 102.6(a)(1)(iv) by making said \$7,000 transfer to the Committee.

On January 18, 1990, the Office of the General Counsel sent briefs to both respondents. Both briefs recommended that the Commission find no probable cause to believe that either

1. Neil A. Dick was the Committee's treasurer until July 20, 1987. Donald Riger was appointed the new treasurer on February 2, 1988.

910403356

respondent violated 2 U.S.C. § 441b and 11 C.F.R. § 102.6(a)(1)(iv). This Office did not receive a reply from either respondent concerning the recommendations contained in the briefs.

On January 30, 1990, the Commission determined to enter into negotiations directed towards reaching a settlement prior to a finding of probable cause to believe with the Committee regarding the 2 U.S.C. §§ 432(a) and 433(c) violations.

II. ANALYSIS

A. Conciliation with Fifth Congressional District Democratic Committee

Attached is a conciliation agreement which has been signed by Donald Riger, the treasurer of the Committee. A check for the civil penalty has been received.

21040332367

B. Transfer of Funds (General Counsel's Briefs incorporated by reference)

11 C.F.R. § 102.6(a)(1)(ii) provides that transfers of funds may be made without limit on amount between or among State party committees and subordinate party committees whether or not they are political committees under the Federal Election Campaign Act (the "Act") and whether or not such committees are affiliated. However, pursuant to 11 C.F.R. § 102.6(a)(1)(iv), transfers between state party committees and subordinate party committees can only be made from funds which are permissible under the Act.

In responding to the Commission's finding, the Committee provided an affidavit stating the \$1,000 transfer from the Barry County Democratic Committee was made up of funds received from individuals and profits obtained from operating a bingo game only; there were no labor funds.

The State Committee has sent the Office of the General Counsel considerable documentation concerning its \$7,000 transfer to the Committee, including a copy of the \$7,000 check. The accounting documents show that while funds from labor organizations were placed in the checking account during that month, there were also sufficient contributions from individuals in the account on October 29, 1986 (the date on the transfer check) to cover the \$7,000 transfer. Specifically, the State Committee received \$28,084.50 solely from individuals on October 29, 1986, an amount which more than covered the \$7,000 transfer.

Because the State Committee has been able to demonstrate that there were sufficient funds from individuals in the account on the

21040332368

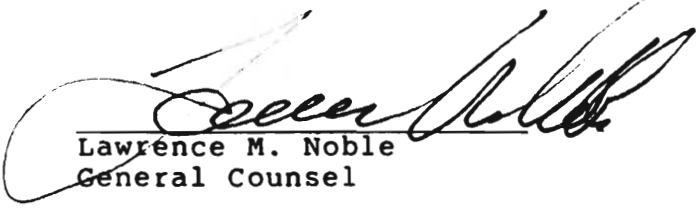
date of the transfer and because the contribution from the Barry Committee did not contain labor funds, this Office recommends that the Commission find no probable cause to believe that the State Committee violated 2 U.S.C. § 441b and 11 C.F.R. § 102.6(a)(1)(iv). This Office also recommends that the Commission find no probable cause to believe that the Committee violated 2 U.S.C. § 441b and 11 C.F.R. § 102.6(a)(1)(iv) and close the file.

III. RECOMMENDATIONS

1. Accept the attached conciliation agreement with the Fifth Congressional District Democratic Committee and Donald Riger, as treasurer.
2. Find no probable cause to believe that the Fifth Congressional District Democratic Committee and Donald Riger, as treasurer, violated 2 U.S.C. § 441b and 11 C.F.R. § 102.6(a)(1)(iv).
3. Find no probable cause to believe that the Michigan Democratic State Central Committee and Laurence B. Deitch, as treasurer, violated 2 U.S.C. § 441b and 11 C.F.R. § 102.6(a)(1)(iv).
4. Close the file.
5. Approve the attached letters.

Date

3/28/90


Lawrence M. Noble
General Counsel

Attachment

1. Conciliation Agreement
2. Photocopy of civil penalty check
3. Letters to Respondents (2)

Staff Assigned: Sandra J. Dunham

91040332869

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 2560
Fifth Congressional District)
Democratic Committee and Donald Riger,)
as treasurer; and)
Michigan Democratic State Central)
Committee and Laurence B. Deitch,)
as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on April 24, 1990, do hereby certify that the Commission decided by a vote of 4-1 to hold in abeyance any action on the recommendations contained in the General Counsel's March 28, 1990 report on MUR 2560, and instead refer the matter back to the Office of General Counsel for further briefing.

Commissioners Aikens, Elliott, Josefiak, and McGarry voted affirmatively for the decision; Commissioner Thomas dissented; Commissioner McDonald was not present.

Attest:

4-25-90
Date

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

01040332870



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT

90 MAY 30 PM 4:29

SENSITIVE

May 30, 1990

MEMORANDUM

TO: The Commission

FROM: Lawrence M. Noble
General Counsel *LM*

SUBJECT: MUR 2560

Attached for the Commission's review is a supplemental brief stating the position of the General Counsel on additional legal and factual issues in the above-captioned matter. A copy of this brief and a letter notifying the respondent of the General Counsel's intent to recommend to the Commission a finding of probable cause to believe were mailed on May 30, 1990. Following receipt of the respondent's reply to this notice, this Office will make a further report to the Commission.

Attachments

1. Supplemental Brief
2. Letter to respondent

91040332371



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 30, 1990

Laurence B. Deitch, Esquire
Simon, Deitch, Friedman & Siefman and Green
26911 Northwestern Highway
Suite 400, P.O. Box 5073
Southfield, MI 48086

RE: MUR 2560
Michigan Democratic State
Central Committee and
Laurence B. Deitch, as
treasurer

Dear Mr. Deitch:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, on June 28, 1988, the Federal Election Commission found reason to believe that the Michigan Democratic State Central Committee and Thomas Roach, as treasurer, violated 2 U.S.C. § 441b and 11 C.F.R. § 102.6(a)(1)(iv), and instituted an investigation in this matter.

You were notified on January 18, 1990 that the Office of the General Counsel was prepared to recommend that the Commission find no probable cause to believe that these violations had occurred. Since that time, the Office of the General Counsel has further considered the issues raised in this matter and is now prepared to recommend that the Commission find probable cause to believe that the Committee has violated 2 U.S.C. §§ 433(a) and 434 by failing to register and report as a Federal committee. Consequently, submitted for your review is a supplemental brief stating the position of the General Counsel on additional legal and factual issues in the case.

The Commission may or may not approve the General Counsel's recommendations contained in this supplemental brief. Within 15 days of your receipt of this notice, you may file with the Secretary of the Commission a brief (ten copies if possible) stating your position on the issues and replying to the supplemental brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of the General Counsel, if possible.) The General Counsel's supplemental brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of whether there is probable cause to believe a violation has occurred.

11, 40, 32, 37, 2

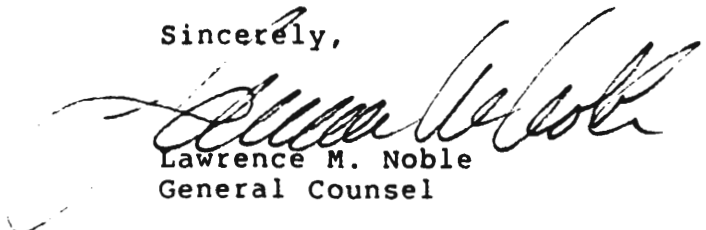
Laurence B. Deitch
Page 2

If you are unable to file a responsive brief within 15 days, you may submit a written request for an extension of time. All requests for extensions of time must be submitted in writing five days prior to the due date, and good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

A finding of probable cause to believe requires that the Office of the General Counsel attempt for a period of not less than 30, but not more than 90 days, to settle this matter through a conciliation agreement.

Should you have any questions, please contact Sandra J. Dunham, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Brief

21040332373

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Michigan Democratic State Central) MUR 2560
Committee and Laurence B. Deitch,)
as treasurer)

GENERAL COUNSEL'S SUPPLEMENTAL BRIEF

I. STATEMENT OF THE CASE

On June 28, 1988, the Commission found reason to believe that the Michigan Democratic State Central Committee (the "State Committee") and its treasurer violated 2 U.S.C. § 441b and 11 C.F.R. § 102.6(a)(1)(iv) by making a \$7,000 transfer to the Fifth Congressional District Democratic Committee (the "Committee"). ^{1/} The State Committee is not registered with the Federal Election Commission as a political committee.

II. ANALYSIS

Any committee of a political party which makes contributions or expenditures aggregating in excess of \$1,000 during a calendar year for purposes of influencing a Federal election is a political committee. 2 U.S.C. § 431(4)(A) and 11 C.F.R. § 100.5(a). Pursuant to 11 C.F.R. §§ 102.6(a)(1)(ii) and (2), unlimited transfers of funds may be made between a State party committee and any subordinate party committee whether or not they are political

^{1/} On January 18, 1990, the Office of the General Counsel sent the State Committee a brief recommending that the Commission find no probable cause to believe that the State Committee violated 2 U.S.C. § 441b and 11 C.F.R. § 102.6(a)(1)(iv). The recommendation for probable cause to believe contained in this present brief is in addition to the recommendations contained in the first brief. The Commission has not yet acted on any of the General Counsel's recommendations in this matter.

committees and whether or not they are affiliated; however, committees making such transfers must count such transfers against the reporting thresholds of the Federal Election Campaign Act for purposes of determining whether a committee is a political committee. Pursuant to 2 U.S.C. § 433(a), all political committees must file a statement of organization within 10 days of becoming a political committee within the meaning of Section 431(4). Further, 2 U.S.C. § 434 states that all political committees must file reports of receipts and disbursements in accordance with one of the subsections of Section 434.

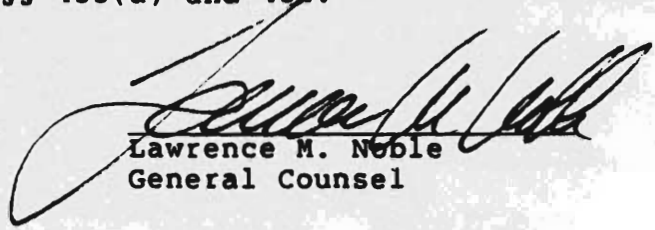
The State Committee made a \$7,000 transfer to the Committee on October 29, 1986. By making a transfer of this amount to a committee registered with the Commission, the State Committee became a political committee pursuant to Section 431(4)(A). The State Committee should have registered and reported with the Commission within 10 days of the \$7,000 transfer. It failed to file both a statement of organization and subsequent reports disclosing its receipts and disbursements. Consequently, the Office of the General Counsel recommends that the Commission find probable cause to believe that the Michigan Democratic State Central Committee and Laurence B. Deitch, as treasurer, violated 2 U.S.C. §§ 433(a) and 434.

III. GENERAL COUNSEL'S RECOMMENDATION

Find probable cause to believe that the Michigan Democratic State Central Committee and Laurence B. Deitch, as treasurer, violated 2 U.S.C. §§ 433(a) and 434.

Date

5/30/90


Lawrence M. Noble
General Counsel

104033376

066 6528

HAND DELIVERED

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

SIMPSON MORAN
Attorneys at Law

90 JUN 13 AM 10:22

SUITE 400
26911 NORTHWESTERN HIGHWAY
POST OFFICE BOX 5073
SOUTHFIELD, MICHIGAN 48066
TELEPHONE (313) 262-1600
FAX (313) 355-5830

JAMES A. SIMPSON
PATRICK A. MORAN
DAVID F. SIMON
LAURENCE B. DEITCH
DANIEL F. BERRY
JOHN E. YOUNG
VIVIAN S. PERRY
THOMAS D. POINTNER
DONALD A. VAN SUILLICHEM
MARILYN H. MITCHELL
MALCOLM D. BROWN
JAY N. SIEFMAN
FRED S. GREEN 3
PHILIP J. GOODMAN
MICHAEL A. NEDELMAN 1
CLARK O. DOUGHTY 1
RICHARD P. MANCZAK 2
NANCY S. MACHELSKI
FREDRIC A. SMITH
JAMES E. ROMZEK
RICHARD S. LONG

RICHARD E. JOSEPH
HARRY K. GOLSKI
TERRI L. NORTH 1
SCOTT A. STEINHOFF
BRYANT M. FRANK 3, 4
MARY D. ANDREWS
JOSEPH H. HICKEY
VALERIE L. HARRIS
RICHARD CHYETTE
DAVID S. DEUTSCH
W. GREGORY SHANABERGER
GLENN R. MATECUN
ERICA A. PARZIANELLO
STEVEN G. SILVERMAN
BLAIR A. PERSON
JOHN A. HUBBARD
DAVID H. FREEDMAN
MARK H. SHAPIRO

STEVEN J. FISHER
OF COUNSEL

- 1 ALSO MEMBER OF FLORIDA BAR
- 2 ALSO MEMBER OF COLORADO BAR
- 3 ALSO MEMBER OF DISTRICT OF COLUMBIA BAR
- 4 ALSO MEMBER OF CALIFORNIA BAR

June 11, 1990

Ms. Sandra J. Dunham
Federal Election Commission
Washington, D.C. 20463

VIA FEDERAL EXPRESS

RE: MUR 2560
Michigan Democratic State
Central Committee and
Laurence B. Deitch, as
treasurer

Dear Ms. Dunham:

Per our conversation of this morning, I am writing to confirm that you have given The Michigan Democratic State Central Committee and the undersigned until June, 25, 1990 to file a supplemental brief in the above referenced matter.

As we discussed, I will let you know if new counsel will be substituted for the undersigned.

Sincerely,

SIMPSON MORAN

Laurence B. Deitch
Laurence E. Deitch

LBD/gms:5

cc: Carol Norris
F. Thomas Lewand

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF ATTORNEY GENERAL
COUNSEL

90 JUN 13 AM 11:32

7
2
3
3
0
4
0
1
0



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 20, 1990

Laurence B. Deitch, Esquire
Simpson Moran
Suite 400
26911 Northwestern Highway
Post Office Box 5073
Southfield, MI 48086

RE: MUR 2560
Michigan Democratic State
Central Committee and
Laurence B. Deitch, as
treasurer

Dear Mr. Deitch:

This is in response to your letter dated June 11, 1990, which we received on June 13, 1990, requesting an extension until June 25, 1990 to respond to the General Counsel's supplemental brief. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by the close of business on June 25, 1990.

If you have any questions, please contact Sandra J. Dunham, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

A handwritten signature in dark ink, appearing to be "L. G. Lerner", written over a horizontal line.

BY: Lois G. Lerner
Associate General Counsel

910403373

06C 6708

SACHS, NUNN, KATES, RADUSHIN, O'HARE, HELVESTON & WALDMAN, P.C.

**ATTORNEYS AND COUNSELORS AT LAW
1000 FARMER
DETROIT, MICHIGAN 48226**

**(313) 965-3464
FAX NO. (313) 965-0268**

THEODORE SACHS
MELVYN J. KATES
A. DONALD RADUSHIN
ROLLAND R. O'HARE
RONALD R. HELVESTON
BARRY P. WALDMAN
ROBERT S. KODGES
DAVID K. BARNES, JR.
RONALD S. WEINER
JOHN L. ZORZA II
EILEEN NOWIKOWSKI
KATHLEEN L. SOGAS
ANN E. NEYDON
I. MARK STECHLOFF
JAMES MICHAEL MONDRO
GREGORY M. JANNE
GRANNER S. RIES
MARY ELLEN GUREWITZ
GEORGE H. KRUSZEWSKI
GEORGE T. FISHBACH
JOHN R. RUNYAN, JR.
JOHN C. MCINTOSH

JOSEPH P. BUTTIGLIERI
MARK BREWER
ANDREW A. NICKELHOFF
DENISE L. MITCHAM
JOY A. TURNER
JOYCE M. OPPENHEIM
MARY KATHERINE MORTON
PHILLIP D. FREDERICK
JOHN S. WISCH
MICHAEL D. McPERRIN
JIM D. EDGAR
ALMA Y. HENLEY
BARBARA M. ROBINSON
JEFFREY C. NELLIS
MICHAEL P. SAGGAU
REGINALD M. TURNER, JR.

D. CHARLES MARSTON
RETIRED
JEANNE NUNN
RETIRED

**PONTIAC OFFICE
1200 PONTIAC STATE BANK BLDG.
PONTIAC, MICHIGAN 48060
(313) 334-0888
FAX NO. (313) 334-8436**

**FLINT OFFICE
6-1300 W. BRISTOL ROAD
SUITE 108
BRISTOL WEST CENTER
FLINT, MICHIGAN 48607
(313) 233-4202
FAX NO. (313) 233-7235**

**LANSING OFFICE
419 S. WASHINGTON
LANSING, MICHIGAN 48033
(313) 482-4163**

June 23, 1990

VIA AIRBORNE EXPRESS

**Secretary
Federal Election Commission
999 E. Street, N.W.
Washington, D.C. 20463**

**RE: MUR 2560: Michigan Democratic State Central Committee and Laurence
B. Deitch, as Treasurer**

Dear Sir/Madam:

**Enclosed please find an original and nine (9) copies of Respondents'
Supplemental Brief in the above-referenced matter.**

Sincerely,

Mark Brewer

**MB/plm
opeiu42af1-cio
Enclosure**

**cc: Theodore Sachs, Esq.
Sandra Dunham, Esq. (3 copies via Airborne Express)
Tom Lewand, Chair, Michigan Democratic Party
Larry Deitch, Treasurer, Michigan Democratic Party
Carol Norris, Executive Director, Michigan Democratic Party**

**RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF THE CLERK
90 JUN 25 PM 1:27**

**RECEIVED
FEDERAL ELECTION COMMISSION
90 JUN 25 AM 10:52
HAND DELIVERED**

6782300401

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

Michigan Democratic State Central)
Committee and Laurence B. Deitch,)
as Treasurer)

MUR 2560

RESPONDENTS' SUPPLEMENTAL BRIEF

2104033230
This is the Supplemental Brief of the Respondents [hereinafter sometimes jointly referred to as "the State Committee"] in reply to the May 30, 1990 Supplemental Brief of the General Counsel raising a new issue for the first time in this 3½-year-old matter and recommending that the Commission find probable cause to believe that Respondents violated 2 U.S.C. §§433(a) and 434. With due respect to the General Counsel, the legal and factual analysis presented in his Supplemental Brief in support of this tardy allegation is flawed and the Commission should not find probable cause to believe that Respondents violated 2 U.S.C. §§433(a) and 434.

ARGUMENT

Before demonstrating that the allegation is meritless, this is to raise a procedural objection to the consideration of the allegation.

The allegation addressed in this brief was first raised by the General Counsel in its letter to Respondents of May 30, 1990, nearly 3½ years after transfer at issue occurred and over 3 years after the investigation into this matter was initiated. Not once throughout the prior lengthy history of this matter, during which the State Committee has fully cooperated, has this newest allegation been even hinted at, let alone raised. Indeed, in January, 1990 the State Committee received correspondence from the General Counsel which indicated that he would recommend a finding of no probable cause. Several months later came this entirely new allegation.

11 C.F.R. §102.6(a)(2) states in its entirety:

When registration and reporting required.
Except as provided in 11 CFR 102.6(b), organizations or committees making transfers under 11 CFR 102.6(a)(1) shall count such transfers against the reporting thresholds of the Act for determining whether an organization or committee is a political committee under 11 CFR 100.5.

In describing the purpose of 11 C.F.R. §102.6(a)(2), the Commission offered the following "Explanation and Justification" when transmitting the regulation to Congress:

Subsection (a)(2) generally follows the provisions of current §102.6(a) to state that transfers of funds count against the reporting thresholds and may trigger political committee status under the Act. Hence, an unregistered committee which makes or receives transfers for the purpose of influencing a federal election may be subject to the registration and reporting requirements of the Act.

48 Fed. Reg. 26,296 (1983) (emphasis added). As the emphasized portion indicates, the transfer of funds must be "for the purpose of influencing a federal election" before 11 C.F.R. §102.6(a)(2) requires that such a transfer count against the registration and reporting thresholds of the FECA.

Similarly, the definition of "political committee" is based on "contributions" or "expenditures" under the FECA, see 11 C.F.R. §100.5(a), and those terms are in turn defined as being made "for the purpose of influencing any election for Federal office," id. §§100.7(a)(1), 100.8(a)(1). Thus the registration and reporting requirements for political committees are triggered only by monies contributed, transferred, or expended "for the purpose of influencing any election for Federal office." This is, of course, in accord with the general thrust of the FECA - to regulate only federal elections and the use of funds to

influence them.

Because the \$7,000 transfer by the State Committee at issue was not "for the purpose of influencing a federal election," it does not count against the FECA's registration and reporting thresholds. Therefore, the \$7,000 transfer did not cause the State Committee to become a "political committee" under 2 U.S.C. §431(4)(A), nor was the State Committee required to register and report under 2 U.S.C. §§433(a) and 434 due to that \$7,000 transfer.

The use of the word "purpose" in the FECA clearly evidences an intent requirement on the part of the person or group making the contribution, expenditure or transfer to influence a federal election thereby. In the absence of an intent to influence a federal election, there is no such purpose and therefore the various registration and reporting requirements of the FECA are not triggered. Whether such intent exists can only be determined by reviewing all of the relevant facts and circumstances here, which the General Counsel failed to do.

There is absolutely no evidence whatsoever that that \$7,000 transfer was intended by the State Committee to be used for the purpose of influencing a federal election. The evidence in fact indicates that the State Committee intended that, to the contrary, the transfer was to be used for non-federal elections.

First, the transfer was made from a non-federal account of the State Committee. If the State Committee had intended the transfer to influence a federal election, why was the transfer not from its federal account which was already established for that purpose? The only intent which can be inferred from the source of the funds is an intent to influence non-federal elections.

Second, the transfer was to an entity which maintained both federal and non-federal accounts during a period before a federal and scores of non-

4
3
2
1
0
4
0
1
2
3
4
federal elections.^{1/} Thus nothing about the entity which accepted the transfer (e.g., it had only a federal account) or about the time of the transfer (e.g., the upcoming election was only a federal election), demonstrates that there was a purpose or intent on the part of the State Committee to influence a federal election with the transfer at issue.

Moreover, the State Committee did not direct that the \$7,000 be placed in the federal account of the recipient and referenced no federal election or candidate whatsoever as part of the transfer. None of these circumstances demonstrate an intent or purpose by the State Committee to influence a federal election. Indeed, these circumstances demonstrate instead an intent to influence non-federal elections.

The only "fact" which even arguably tends to establish that the purpose of the transfer was to influence a federal election was the Fifth Congressional District Democratic Committee's act of depositing the \$7,000 into its federal account. However that deposit is certainly not evidence of the State Committee's intent because the State Committee had no control over (indeed, no knowledge of until much later) the deposit by the Fifth Congressional Democratic Committee into its federal account. Thus the State Committee's intent cannot be inferred from an event over which it had no control and of which it had no contemporaneous knowledge.

^{1/}In 1986 in Michigan there were at least 14 statewide offices, including the governorship, the entire 148-member State Legislature, and myriad county and local offices on the state ballot, all of which of course were of considerable importance to the State Committee. All of the statewide races were contested as were many local races in this vigorous two-party state. In contrast to the numerous contested state and local races in the Fifth Congressional District that year which were of interest to the State Committee, there was but a single federal election in that district that year.

2
1
0
4
0
3
2
3
3
5

This conclusion is buttressed by what occurred when the State Committee learned of the deposit of the \$7,000 into the federal account. As the "Factual and Legal Analysis" attached to the July 7, 1988 correspondence to then-Treasurer Thomas Roach in this matter indicated, the Commission acknowledges that once the unintended deposit into the federal account was brought to the attention of the State Committee,

[o]n April 22, 1987, the Michigan Democratic Party sent a letter to RAD explaining that that \$7,000 transfer from the State Central Committee was presumably deposited into the Fifth Congressional Committee's federal account in error. A letter from the Michigan Democratic Party was sent to the Fifth Congressional Committee on the same day requesting it transfer the \$7,000 to the [non-federal] Administrative Fund.

At 2. Thus the State Committee reacted expeditiously and firmly to insure that its intent that the transfer be made to a non-federal account was carried out once the erroneous deposit was discovered. Once the Fifth Congressional District Democratic Committee was notified of its error, that committee similarly promptly began transferring the \$7,000 to its non-federal Administrative Fund. That transfer was completed on June 20, 1987. At 1-2.

Thus, the evidence as described in the Commission's own analysis of this matter completely belies any purpose on the part of the State Committee to influence a federal election with the \$7,000 transfer. Indeed, the Commission's own description of the evidence indicates that it was the State Committee's desire that the \$7,000 transfer be placed in the non-federal Administrative Fund to be used in non-federal elections.

Not only do these events illuminate the State Committee's intent that its transfer be to a non-federal account, but the subsequent transfer by the Fifth

0
1
2
3
4
5
6
7
8
9
District from its federal to its non-federal account also effectively rescinded the original deposit which arguably subjected the State Committee to FECA's registration and reporting requirements. The Commission has opined that rescission of a triggering transaction will enable a non-federal committee "to avoid the registration and reporting requirements of the Act." AO 1982-46 at n.8, Fed. Elec. Campaign Fin. Guide ¶5687 (July 29, 1982). Such a rescission occurred here avoiding the application of FECA to the State Committee.

In conclusion, all of the evidence here consistently points to an intent by the State Committee that the \$7,000 be transferred to a non-federal account. The only "evidence" to the contrary - the actual deposit of the monies into a federal account by another entity - was an event beyond the control and contemporaneous knowledge of the State Committee and was promptly corrected by the State Committee when it learned of that deposit. Therefore the State Committee cannot be held responsible for that deposit nor should any evidence of the State Committee's intent be inferred from the mere deposit of those monies into the wrong account by another entity. Compare, e.g., pre-MUR 127 (1984) (FEC does not open MUR where evidence indicated that local party expenditures related to local, not federal, elections).

In addition to the absence of any evidence of intent by the State Committee to transfer the funds into a federal account, the unintended transfer into that account was rescinded so that even if such intent was proven - and it cannot be - the rescission nonetheless prevents the application of FECA to the State Committee.

CONCLUSION AND RELIEF SOUGHT

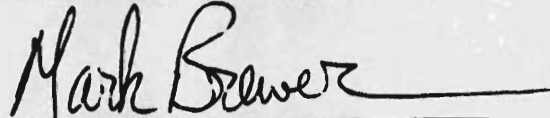
The Respondents respectfully request that the Commission not find

probable cause to believe that they violated 2 U.S.C. §§433(a) and 434.

Respectfully submitted,

SACHS, NUNN, KATES, KADUSHIN,
O'HARE, HELVESTON & WALDMAN, P.C.

BY:



MARK BREWER (P35661)

Attorneys for Respondents
1000 Farmer St.
Detroit, MI 48226
(313) 965-3464

DATED: June 23, 1990

2104032387

066 6671

SACHS, NUNN, KATES, KADUSHIN, O'HARE, HELVESTON & WALDMAN, P.C.

ATTORNEYS AND COUNSELORS AT LAW

1000 FARMER

DETROIT, MICHIGAN 48226

(313) 965-3464

FAX NO. (313) 965-0268

THEODORE SACHS
MELVYN J. KATES
A. DONALD KADUSHIN
ROLLAND R. O'HARE
RONALD R. HELVESTON
BARRY P. WALDMAN
ROBERT G. HODGES
DAVID K. BARNES, JR.
RONALD S. WEINER
JOHN L. ZORZA II
EILEEN NOWIKOWSKI
KATHLEEN L. SOGAS
ANN E. NEYDON
I. MARK STECKLOFF
JAMES MICHAEL MONDRO
GREGORY M. JANKS
GRANNER S. RIES
MARY ELLEN GUREWITZ
GEORGE H. KRUSZEWSKI
GEORGE T. FISHBACH
JOHN R. RUNYAN, JR.
JOHN C. MCINTOSH

JOSEPH P. BUTTIGLIERI
MARK BREWER
ANDREW A. NICKELHOFF
DENISE L. MITCHAM
JOY A. TURNER
JOYCE M. OPPENHEIM
MARY KATHERINE NORTON
PHILLIP D. FREDERICK
JOHN S. NISCH
MICHAEL D. McFERREN
JIM D. EGGAR
ALMA Y. HENLEY
BARBARA M. ROBINSON
JEFFREY C. NELLIS
MICHAEL F. SAGGAU
REGINALD M. TURNER, JR.

D. CHARLES MARSTON
RETIRED
JEANNE NUNN
RETIRED

PONTIAC OFFICE
1200 PONTIAC STATE BANK BLDG.
PONTIAC, MICHIGAN 48055
(313) 334-0582
FAX NO. (313) 334-8436

FLINT OFFICE
8-1388 W. BRISTOL ROAD
SUITE 105
BRISTOL WEST CENTER
FLINT, MICHIGAN 48507
(313) 233-4202
FAX NO. (313) 233-7239

LANSING OFFICE
419 S. WASHINGTON
LANSING, MICHIGAN 48033
(517) 482-4163

June 19, 1990

Ms. Sandra J. Dunham
Federal Election Commission
Washington, D.C. 20463

Re: MUR 2560: Michigan Democratic State Central Committee and Laurence
B. Deitch, as Treasurer

Dear Ms. Dunham:

Please enter our appearance as substitute counsel in the above-referenced matter on behalf of the Committee and Mr. Deitch. Please direct all future correspondence and inquiries in this matter to the undersigned.

Respectfully submitted,

SACHS, NUNN, KATES, KADUSHIN,
O'HARE, HELVESTON & WALDMAN, P.C.

BY:


MARK BREWER (P35661)

MB/plm
opeiu42afl-cio

cc: Theodore Sachs, Esq.
Tom Lewand, Chair, Michigan Democratic Party
Larry Deitch, Treasurer, Michigan Democratic Party
Carol Norris, Executive Director, Michigan Democratic Party

90 JUN 21 PM 3:46

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

90 JUN 21 AM 10:38

RECEIVED
FEDERAL ELECTION COMMISSION

91 JAN 29 PM 4:34

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Fifth Congressional District)
Democratic Committee and Donald)
Rider, as treasurer; and) MUR 2560
Michigan Democratic State Central)
Committee and Laurence B. Deitch,)
as treasurer)

FEB 12 1991

EXECUTIVE SESSION
SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On December 8, 1987, the Commission found reason to believe that the Fifth Congressional District Democratic Committee (the "Congressional Committee") and its treasurer, had violated 2 U.S.C. § 441b and 11 C.F.R. § 102.6(a)(1)(iv) by accepting a \$7,000 transfer from the Michigan Democratic State Central Committee (the "State Committee") and a \$1,000 transfer from the Barry County Democratic Committee, both non-federal entities. Thereafter, on June 28, 1988, the Commission found reason to believe that the State Committee and Laurence B. Deitch, as treasurer, violated 2 U.S.C. § 441b and 11 C.F.R. § 102.6(a)(1)(iv) by making the \$7,000 transfer to the Congressional Committee. On the same date, the Commission also found reason to believe that the Congressional Committee violated 2 U.S.C. §§ 432(a) and 433(c) by failing to have a treasurer for more than six months and by failing to amend its Statement of Organization in a timely fashion.^{1/}

On January 18, 1990, the Office of the General Counsel sent

^{1/} Neil A. Dick was the Congressional Committee's treasurer until July 20, 1987. Donald Riger was appointed the new treasurer on February 2, 1988.

21040332339

briefs to both respondents. Those briefs recommended that the Commission find no probable cause to believe that either respondent violated 2 U.S.C. § 441b and 11 C.F.R.

§ 102.6(a)(1)(iv). This Office did not receive a reply from either respondent concerning the recommendations contained in the briefs.

In a report dated March 28, 1990, this Office recommended that the Commission find no probable cause to believe that either the Congressional Committee or the State Committee violated 2 U.S.C. § 441b and 11 C.F.R. § 102.6(a)(1)(iv); accept the conciliation agreement submitted by the Congressional Committee; and close the file in this matter. However, on April 24, 1990, the Commission decided to hold in abeyance all of the recommendations contained in the March 28th General Counsel's Report and referred the matter back to this Office for further briefing. Specifically, the Commission directed this Office to address the issue of the State Committee's failure to register and report to the Commission after attaining political committee

2104032370

status as a result of the \$7,000 transfer to the Congressional Committee. Consequently, this Office sent the State Committee a supplemental brief on May 30, 1990 recommending probable cause to believe that the State Committee violated 2 U.S.C. §§ 433(a) and 434. Counsel for the State Committee replied to the supplemental brief on June 23, 1990. Attachment 3.

II. ANALYSIS (General Counsel's Briefs incorporated by reference)

In his response to the supplemental brief, counsel for the State Committee addresses the new issues raised by the Commission and raises an additional procedural objection.

As discussed below, the Office of General Counsel now recommends that the Commission find probable cause to believe the Congressional Committee violated 2 U.S.C. §§ 433(a) and 434; renews its prior no probable cause to believe recommendations with respect to violations of 2 U.S.C. § 441b and 11 C.F.R. § 102.6(a)(1)(iv) by the State and Congressional Committees; and recommends that the Commission accept the signed conciliation agreement previously submitted by the Congressional Committee resolving the violations of 2 U.S.C. § 432(a) and 433 by that respondent and its treasurer.

A. Registration And Reporting - State Committee

1. Procedural Objection.

Preliminarily, counsel for the State Committee argues that the registration and reporting violations raised in the supplemental brief should be dismissed on procedural grounds. He contends that these violations could have been raised earlier in the matter and asserts that his clients are severely prejudiced in

their ability to defend themselves against these additional allegations due to the passage of time. Counsel also points to the enforcement provisions of the Act which, in his view, provide for specific deadlines in the processing of complaints and investigations, and the corresponding provision of the Administrative Procedure Act (the "APA") which "requires that an agency "shall . . . conclude a matter . . . within a reasonable time." Attachment 3 at 2 (citing 2 U.S.C. § 555(b)).

91040332392
Counsel's procedural arguments are misplaced. While the Act does provide deadlines for certain notifications and negotiations, it does not impose absolute deadlines for the completion of FEC proceedings. Indeed, it is well established that Commission enforcement proceedings need not be completed by any certain deadline.^{2/} Furthermore, while the supplemental brief in this case was issued nearly two years after the Commission first made reason to believe findings against the State Committee, these latter violations are simply legal consequences of the Commission's initial findings. No new activity is involved. Thus, the loss or destruction of documents and fading memories, the harms typically claimed to have occurred as a result of the passage of time (although not specifically alleged in this case), are not implicated here. Respondents therefore are not prejudiced as

^{2/} The Act also does not require that all possible violations must be alleged at the same time. The Commission therefore routinely "adds" additional apparent violations whenever they come to its attention. Further, Commission enforcement proceedings are not governed by the APA.

their counsel contends. For these reasons, respondents' procedural objections are without merit.

2. Substantive Violations

Any committee of a political party which makes contributions or expenditures aggregating in excess of \$1,000 during a calendar year for the purpose of influencing a federal election is a political committee. 2 U.S.C. § 431(4)(A) and 11 C.F.R. § 100.5(a). Pursuant to 11 C.F.R. §§ 102.6(a)(1)(ii) and 102.6(a)(2), unlimited transfers of funds may be made between a State party committee and any subordinate party committee whether or not they are political committees and whether or not they are affiliated; however, committees making such transfers must count such transfers against the reporting thresholds of the Federal Election Campaign Act for purposes of determining whether a committee is a political committee.

2 U.S.C. § 433(a) states that all political committees must file a statement of organization within 10 days of becoming a political committee within the meaning of section 431(4). Political committees must also file reports of receipts and disbursements in accordance with one of the subsections in section 434. 2 U.S.C. § 434.

The State Committee argues that this Office has misapplied 11 C.F.R. § 102.6(a)(2) in this case. Counsel correctly notes that transfers over the amount of \$1,000 must be made for the purpose of influencing a federal election in order for the

registration threshold to be triggered. He claims, however, that there was

absolutely no evidence whatsoever that the \$7,000 transfer to the Committee was for the purpose of influencing a federal election. The evidence in fact indicates that the State Committee intended that, to the contrary, the transfer was to be used for non-federal elections.

Attachment 3 at 4. In this regard, counsel for respondents argues that because the transfer was made from a non-federal entity, it should be inferred that the only intent of the funds was to influence non-federal elections. Counsel also emphasizes that the Congressional Committee maintains both federal and non-federal "accounts," thus implying that a mistake may have occurred.^{3/} Respondents also contend that the motive of the recipient committee, demonstrated here by the deposit of the funds into its federal committee's bank account, is irrelevant. Counsel also notes that at the time of the transfer in 1986, there were numerous state, county and local elections being held but only one federal election. Attachment 3 at 5. He believes that these latter statistics alone indicate that the money was intended for non-federal use.

Respondents state that the "only 'fact' which even arguably tends to establish that the purpose of the transfer was to influence a federal election was the Fifth Congressional

^{3/} Counsel incorrectly characterizes the true relationship of these "accounts." The Congressional Committee does not have two separate accounts; Michigan election law does not allow it. Instead there are two separate committees for that congressional district, one for federal activity and one for non-federal activity. These two committees are affiliated.

21040332395
District Democratic Committee's act of depositing the \$7,000 into its federal account." Attachment 3 at 5. Counsel contends, however, that the State Committee had no control over, nor contemporaneous knowledge of, the deposit of the \$7,000 transfer into the Congressional Committee's federal rather than the non-federal "account." Respondents also assert that the State Committee did not direct that the funds be placed in the federal "account" and that no references to federal elections nor candidates were made in connection with the transfer of funds. Consequently, respondents argue that it cannot be assumed that the State Committee transferred the \$7,000 to the Committee for the purpose of influencing a federal election. In any event, the State Committee promptly contacted the Congressional Committee requesting that it transfer the \$7,000 to its non-federal entity when the Reports Analysis Division questioned the transaction. Attachment 3 at 6. Because the Congressional Committee eventually transferred all of the funds in question to its non-federal entity, counsel for respondents argues that under Advisory Opinion 1982-46 (Texas Manufactured Housing Association), the transaction was effectively rescinded. Attachment 3 at 7.

Respondents' arguments regarding the nature of the parties and the circumstances of the transaction ignore the most crucial fact in this case. The State Committee apparently gave the \$7,000 transfer check to Neil A. Dick, the Congressional Committee's treasurer at the time of the transfer. If the State Committee intended the money for non-federal use, it should have

transferred the funds to the Fifth Congressional District's non-federal committee, the Fifth District Democratic Administrative Fund (the "Administrative Fund"), which is a separate organization with a separate treasurer at a separate address.

While the State Committee has made numerous arguments as to why the Commission should conclude that the \$7,000 transfer was not for the purpose of influencing a federal election, respondents have provided no evidence whatsoever in this regard. Instead, respondents rely on negative inference to bolster their position. They argue that because there were no instructions indicating the \$7,000 was for federal use, it could not have been intended for federal use.^{4/} Such an argument must fail in view of the evidence showing that the funds were given to the federal committee, not the separate non-federal organization. Respondents thus clearly have failed to demonstrate that the transfer was not for the purpose of influencing a federal election.

The State Committee's further argument, based upon a footnote to Advisory Opinion 1982-46, that the initial transaction was effectively rescinded with the transfer of the funds to the non-federal entity, thus eliminating the necessity of registration and reporting, also is without merit. There are some important factual distinctions between the instant matter

^{4/} In a letter dated February 2, 1989, Mr. Deitch writes that a review of the State Committee's records indicate that no written cover letter for the transfer exists. Attachment 4 at 1.

0104032396

and the advisory opinion. In the Advisory Opinion 1982-46, for example, the requesting committee was a separate segregated fund. It is important to note that this separate segregated fund would have become a federal committee even if it had made a one dollar (\$1.00) contribution because any contribution would have triggered the registering and reporting threshold. The State Committee, however, did not become a political committee until it made at least \$1,000 in contributions.

Another distinguishing fact concerns the amount of time the recipient committee possessed the contribution/transferred money. According to the requester, the funds at issue in the advisory opinion had only been contributed to a federal committee "recently." The recipient committee therefore presumably only had benefit of those funds for a short period of time. Here, however, the Congressional Committee had use of the funds from the State Committee for nearly eight months -- from October 29, 1986 when the original transfer to the Congressional Committee occurred until June 30, 1987 when the requested "corrective" transfer to the Administrative Fund was completed. It should be noted that the Congressional Committee was unable to transfer the entire \$7,000 to the Administrative Fund at one time. According to its 1987 Mid-Year Report, there was one transfer for \$2,000 on April 21st and a second transfer for \$5,000 on June 30th. This later date is almost two months after the State Committee asked that the "corrective" action be taken. Thus, it appears that the Congressional Committee might have been short of funds at that time. In any event, eight months is

7
9
3
2
3
3
0
4
0
1
0
2

certainly enough time for a \$7,000 to have influenced a federal election. Advisory Opinion 1982-46 therefore is distinguishable.

Based on the foregoing, this Office therefore recommends that the Commission find that there is probable cause to believe that the Michigan Democratic State Central Committee and Laurence B. Deitch, as treasurer, violated 2 U.S.C. § 433(a).

Because the State Committee became a political committee when it made the \$7,000 transfer to the Committee, it follows that it should have filed reports of its receipts and disbursements. Since the the State Committee failed to file any reports of receipts and disbursements, this Office also recommends that the Commission find that there is probable cause to believe that the Michigan Democratic State Central Committee and Laurence B. Deitch, as treasurer, violated 2 U.S.C. § 434.

B. Transfer of Funds - Congressional Committee and State Committee

11 C.F.R. § 102.6(a)(1)(ii) provides that transfers of funds may be made without limit on amount between or among State party committees and subordinate party committees whether or not they are political committees under the Federal Election Campaign Act and whether or not such committees are affiliated. However, pursuant to 11 C.F.R. § 102.6(a)(1)(iv), transfers between state party committees and subordinate party committees can only be made from funds which are permissible under the Act.

21040332398

As discussed in the March 28, 1990 General Counsel's Report, in responding to the Commission's finding, the Congressional Committee provided an affidavit stating the \$1,000 transfer from the Barry County Democratic Committee was made up of funds received from individuals and profits obtained from operating a bingo game only; there were no labor funds.

Similarly, the State Committee has sent the Office of the General Counsel considerable documentation concerning its \$7,000 transfer to the Congressional Committee, including a copy of the \$7,000 check. The accounting documents show that while funds from labor organizations were placed in the checking account during that month, there were also sufficient contributions from individuals in the account on October 29, 1986 (the date on the transfer check) to cover the \$7,000 transfer. Specifically, the State Committee received \$28,084.50 solely from individuals on October 29, 1986, an amount which more than covered the \$7,000 transfer.

Because the State Committee has been able to demonstrate that there were sufficient funds from individuals in the account on the date of the transfer and because the contribution from the Barry Committee did not contain labor funds, this Office recommends that the Commission find no probable cause to believe that the State Committee violated 2 U.S.C. § 441b and 11 C.F.R. § 102.6(a)(1)(iv). This Office also recommends that the Commission find no probable cause to believe that the Congressional Committee violated 2 U.S.C. § 441b and 11 C.F.R. § 102.6(a)(1)(iv).

91040332399

C. Conciliation With The Congressional Committee

This Office is recommending once again that the Commission accept the conciliation agreement which has been signed by Donald Riger, the treasurer of the Congressional Committee.

When the Commission decided to hold all of the recommendations contained in the General Counsel's Report dated March 28, 1990 in abeyance, this Office was instructed to do a supplemental brief on the State Committee. The Commission did not give any indication that they were opposed to conciliating with the Congressional Committee. Therefore, this Office recommends that the Commission accept the attached conciliation agreement from the Congressional Committee.

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

A. Congressional Committee

91040332900

B. State Committee

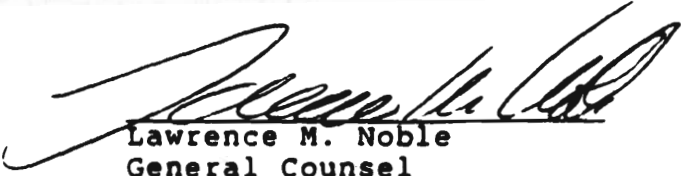
IV. RECOMMENDATIONS

1. Find probable cause to believe that the Michigan Democratic State Central Committee and Laurence B. Deitch, as treasurer, violated 2 U.S.C. §§ 433(a) and 434.
2. Find no probable cause to believe that the Fifth Congressional District Democratic Committee and Donald Riger, as treasurer, violated 2 U.S.C. § 441b and 11 C.F.R. § 102.6(a)(1)(iv).

3. Find no probable cause to believe that the Michigan Democratic State Central Committee and Laurence B. Deitch, as treasurer, violated 2 U.S.C. § 441b and 11 C.F.R. § 102.6(a)(1)(iv).
4. Accept the attached conciliation agreement with the Fifth Congressional District Democratic Committee and Donald Riger, as treasurer. Attachment 1.
5. Approve the proposed conciliation agreement for the Michigan Democratic State Central Committee and Laurence B. Deitch, as treasurer. Attachment 5.
6. Approve the appropriate letters.

21040332902
Date

1/29/91


Lawrence M. Noble
General Counsel

Attachments:

1. Signed Conciliation Agreement submitted by Congressional Committee
2. Photocopy of civil penalty check
3. State Committee's Reply to Supplemental Brief
4. State Committee's Letter dated February 2, 1989
5. Proposed Conciliation Agreement for State Committee.

Staff assigned: Sandra J. Dunham

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 2560
Fifth Congressional District)
Democratic Committee and Donald)
Rider, as treasurer; and)
Michigan Democratic State Central)
Committee and Laurence B. Deitch,)
as treasurer.)

CORRECTED CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the
Federal Election Commission executive session on
February 12, 1991, do hereby certify that the Commission
decided by a vote of 5-0 to take the following actions
in MUR 2560:

1. Reject recommendation 1 contained in the
General Counsel's report dated January 29,
1991, and instead take no further action
with respect to the Michigan Democratic
State Central Committee and Laurence B.
Deitch, as treasurer, with respect to
violations of 2 U.S.C. §§ 433(a) and 434.
2. Find no probable cause to believe that
the Fifth Congressional District Democratic
Committee and Donald Riger, as treasurer,
violated 2 U.S.C. § 441b and 11 C.F.R.
§ 102.6(a)(1)(iv).

(continued)

21040332903

Federal Election Commission
Certification for MUR 2560
February 12, 1991

Page 2

3. Find no probable cause to believe that the Michigan Democratic State Central Committee and Laurence B. Deitch, as treasurer, violated 2 U.S.C. § 441b and 11 C.F.R. § 102.6(a)(1)(iv).
4. Accept the conciliation agreement with the Fifth Congressional District Democratic Committee and Donald Riger, as treasurer, as recommended in the General Counsel's report dated January 29, 1991.
5. Direct the Office of General Counsel to send appropriate letters pursuant to the above actions.

Commissioners Aikens, Elliott, McDonald, McGarry,
and Thomas voted affirmatively for the decision;
Commissioner Josefiak was not present.

Attest:

3-7-91

Date

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

21040332904

91 FEB 22 AM 9:15

BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of)
)
Fifth Congressional District)
Democratic Committee and Donald) MUR 2560
Rider, as treasurer; and Michigan)
Democratic State Central Committee)
and Laurence B. Deitch, as treasurer)

GENERAL COUNSEL'S REPORT

I. DISCUSSION

On February 12, 1990, the Commission rejected this Office's recommendation that there is probable cause to believe the Michigan Democratic State Central Committee and Laurence B. Deitch, as treasurer (the "State Committee"), violated 2 U.S.C. §§ 433(a) and 434, and instead determined to take no further action with respect to those violations. On that same date, the Commission also found no probable cause to believe that either the State Committee or the Fifth Congressional District Democratic Committee and Donald Riger, as treasurer ("Congressional Committee"), violated 2 U.S.C. § 441b and 11 C.F.R. § 102.6(a)(1)(iv). In addition, the Commission accepted the signed conciliation agreement submitted by the Congressional Committee with respect to other violations by that entity.

Although the Commission directed the Office of General Counsel to send appropriate notification letters for the above actions, the file was never formally closed in this matter.

21040332905

This Office therefore recommends that the Commission close the file as to all respondents.

II. RECOMMENDATIONS

1. Close the file.

Lawrence M. Noble
General Counsel

February 21, 1991
Date

By: Lois G. Lerner
Lois G. Lerner
Associate General Counsel

Staff Assigned: Sandra J. Dunham

91040332906

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Fifth Congressional District
Democratic Committee and Donald
Rider, as treasurer; and Michigan
Democratic State Central Committee
and Laurence B. Deitch, as treasurer.

MUR 2560

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on February 27, 1991, the Commission decided by a vote of 6-0 to close the file, as recommended in the General Counsel's Report dated February 21, 1991.

Commissioners Aikens, Elliott, Josefiak, McDonald, McGarry, and Thomas voted affirmatively for the decision.

Attest:

2-27-91
Date

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

Received in the Secretariat: Fri., Feb. 22, 1991 9:15 a.m.
Circulated to the Commission: Mon., Feb. 25, 1991 11:00 a.m.
Deadline for vote: Wed., Feb. 27, 1991 11:00 a.m.

dr

9104032907



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CLOSED

March 6, 1991

Mark Brewer, Esquire
Sachs, Nunn, Kates, Kadushin,
O'Hare, Helveston & Waldman, PC
1000 Farmer
Detroit, Michigan 48226

RE: MUR 2560
Michigan Democratic State
Central Committee and Laurence B.
Deitch, as treasurer

Dear Mr. Brewer:

This is to advise you that on February 12, 1991, the Federal Election Commission found no probable cause to believe that the Michigan Democratic State Central Committee (the "Committee") and Laurence B. Deitch, as treasurer, violated 2 U.S.C. § 441b and 11 C.F.R. § 102.6(a)(1)(iv), a provision of the Federal Election Campaign Act of 1971, as amended (the "FECA") and the Commission regulations. The Commission further determined to take no further action against the Committee regarding possible violations of the FECA and voted to close its file in this matter on February 27, 1991.

The file will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

If you have any questions, please contact Sandra J. Dunham, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

21040332908



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 6, 1991

Donald Riger, Treasurer
Fifth Congressional District
Democratic Committee
1709 Herrity
Ionia, Michigan 48846

RE: MUR 2560
Fifth Congressional District
Democratic Committee

Dear Mr. Riger:

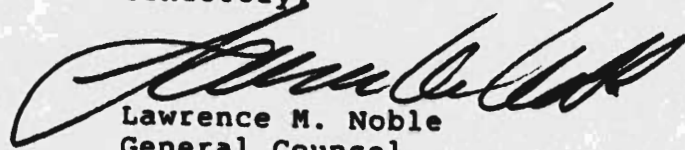
On February 12, 1991, the Federal Election Commission found no probable cause to believe that the Fifth Congressional District Democratic Committee (the "Committee") and you, as treasurer, violated 2 U.S.C. § 441b and 11 C.F.R. § 102.6(a)(1)(iv), a provision of the Federal Election Campaign Act of 1971, as amended and the Commission regulations. The Commission also accepted the signed conciliation agreement and civil penalty submitted on behalf of the Committee and you, in settlement of a violation of 2 U.S.C. §§ 432(a) and 433(c). Accordingly, the Commission voted to close the file on this matter on February 27, 1991.

This matter will become a part of the public record within 30 days. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel. Please be advised that information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

Donald Riger
Page 2

Enclosed you will find a copy of the fully executed conciliation agreement for your files. If you have any questions, please contact Sandra J. Dunham, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreement

21040332910

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Fifth Congressional District) MUR 2560
Democratic Committee and)
Donald Riger, as treasurer)

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that the Fifth Congressional District Democratic Committee and its treasurer ("Respondents") violated 2 U.S.C. §§ 432(a) and 433(c) .

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, Fifth Congressional District Democratic Committee, is a political committee within the meaning of 2 U.S.C. § 431(4).

21040332911

2. Neil A. Dick served as treasurer until his resignation on July 20, 1987.

3. Respondent, Donald Riger, is the current treasurer of the Fifth Congressional District Democratic Committee. He became the treasurer on February 2, 1988.

4. Respondents notified the Commission of this change in treasurer on February 2, 1988.

V. Pursuant to 2 U.S.C. § 432(a), every political committee shall have a treasurer. Respondent committee did not have a treasurer from July 20, 1987 to February 2, 1988. Therefore, Respondents violated 2 U.S.C. § 432(a) by not having a treasurer during the aforementioned period of time.

VI. Pursuant to 2 U.S.C. § 433(c), any change in information previously submitted in a Statement of Organization shall be reported no later than 10 days after the date of the change. Respondents violated 2 U.S.C. § 433(c) by not amending the Statement of Organization within 10 days of the resignation of Mr. Dick on July 20, 1987.

VII. Respondents will pay a civil penalty to the Federal Election Commission in the amount of Two Hundred and Fifty dollars (\$250.00), pursuant to 2 U.S.C. § 437g(a)(5)(A).

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

21040322912

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 30 days from the date this agreement becomes effective to comply with and implement the requirement contained in this agreement and to so notify the Commission.

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

FOR THE COMMISSION:

Lawrence M. Noble
General Counsel

BY:

L. G. Lerner
Lois G. Lerner
Associate General Counsel

Date

3/6/91

FOR THE RESPONDENTS:

Donald Riger
Donald Riger
Treasurer

Date

3/9/90

91040332213



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2560

DATE FILMED 9/29/91 CAMERA NO. 4

CAMERAMAN AS

91040332914