



FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

THIS IS THE BEGINNING OF MUR # 2689

DATE FILMED 8/29/89 CAMERA NO. 4

CAMERAMAN AS

39040761292

PERKINS COIE

A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
1110 VERMONT AVENUE, N.W. • WASHINGTON, D.C. 20005 • (202) 887-9030

August 5, 1987

Lawrence Noble, Esq.
Acting General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Dear Mr. Noble:

This letter constitutes a Complaint by the Democratic Congressional Campaign Committee ("DCCC") alleging violations of the Federal Election Campaign Act, 2 U.S.C. § 431 et seq., by "Salute America Political Action Committee" and the Friends of Vin Weber, the principal campaign committee of Congressman Vin Weber. DCCC alleges specifically that Congressman Weber established Salute America as a conduit for contributions in support of his own personal re-election campaigns to the Congress. As such, Salute America functioned not as a bona fide "multi-candidate committee", as stated to the Commission, but rather as a committee affiliated with Weber's principal campaign committee. The array of violations associated with this set of facts are outlined fully below.

FACTS

In March of 1985, Salute America was established and it was identified on its Statement of Organization as a multi-candidate committee. By amendment to this Statement, filed in August of 1985, Salute America advised the Commission, in belated response to a specific request, that it was not affiliated with any other political committee.

This designation flies in the face of press reports which indicate that this organization was established, in fact, to operate in support of Mr. Weber's re-election and other political activities. The press reported specifically that Salute America was "a political action committee specifically for Weber."

Salute America enjoyed only a brief existence. Over a three-month period, the PAC raised \$25,495 and spent \$23,084. It then disappeared from public view. In violation

GCC# 4089

Mon 2526

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ALL: 50

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FEDERAL ELECTION COMMISSION
AUG 5 1987

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of federal law, failing to file any proper termination report which reflected the extinction of debts or the disposition of surplus, Salute America ceased reporting.

Salute America surfaced again, however, when it was needed the most: in October of the 1986 general election cycle when Mr. Weber encountered a stiff challenge from Democratic nominee David Johnson. According to Friends of Vin Weber Committee reports, Salute America made a maximum \$5,000 general election contribution to that Committee on October 10, 1986. The sudden revival of Salute America under election pressures was underscored by this curious fact: Salute America's \$5,000 contribution was made when its last reported cash on hand was only half that amount.

LEGAL VIOLATIONS

This set of facts points to certain significant violations of the federal law which merit investigation by the Commission. These include specifically:

1. The establishment of Salute America as an affiliated committee of the Weber for Congress Committee, which does not appear as a disclosed relationship on the statement of organization of either in violation of 2 U.S.C. § § 422 and 432.

2. The failure to hold contributors to both committees to a single "affiliated" contribution limit, thereby enabling any one or more contributors to exceed their applicable Weber Committee contribution limitations by giving to both committees. This arrangement violates 2 U.S.C. § 441(a).

3. The making of a contribution "in the name of another" by allowing one or more contributors to direct a pro-Weber contribution in October of 1986 through Salute America to Friends of Vin Weber. This arrangement violates 2 U.S.C. § 441(f).

4. The failure of Salute America to report from mid-1985 to the present, including the failure to file any proper termination report if the committee did intend, in fact, to cease operations. This omission violates 2 U.S.C. § 434.

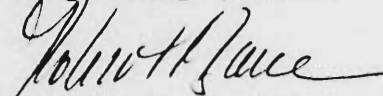
Each of these cited violations is significant and requires Commission attention. Members of Congress should not be permitted to establish multi-candidate committees as a ruse or

44-38861-204

Lawrence Noble, Esq.
August 5, 1987
Page 3

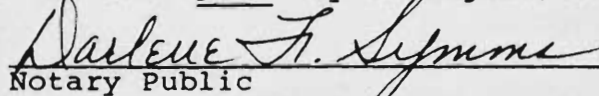
cover for the conduct of their own re-election campaigns under the higher multi-candidate committee limits. The core policies underlying the contribution limitations disclosure requirements of the statute are seriously affected by this state of affairs.

Very truly yours,



Robert F. Bauer
Counsel
Democratic Congressional
Campaign Committee
430 South Capitol St., S.E.
Washington, D.C. 20003
(202)863-1500

Subscribed and sworn to before me this 5th day of August, 1987.


Notary Public

My commission expires: 3/31/89

2344B

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 12, 1987

Robert F. Bauer, Esquire
Democratic Congressional Campaign
Committee
430 South Capitol Street, SE
Washington, DC 20003

RE: MUR 2526

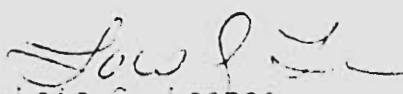
Dear Mr. Bauer:

This letter acknowledges receipt of your complaint, received on August 5, 1987, alleging possible violations of the Federal Election Campaign Act of 1971, as amended (the "Act"), by the Salute America Political Action Committee and Levi Rabinowitz, as treasurer, and Friends Of Vin Weber and Robert A. Kovell, as treasurer. The respondents will be notified of this complaint within five days.

You will be notified as soon as the Federal Election Commission takes final action on your complaint. Should you receive any additional information in this matter, please forward it to the Office of the General Counsel. Such information must be sworn to in the same manner as the original complaint. We have numbered this matter MUR 2526. Please refer to this number in all future correspondence. For your information, we have attached a brief description of the Commission's procedures for handling complaints. If you have any questions, please contact Retha Dixon, Docket Chief, at (202) 376-3110.

Sincerely,

Lawrence M. Noble
Acting General Counsel

By: 
Lois G. Lerner
Associate General Counsel

Enclosures
Procedures

89040761296

Rem



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 12, 1987

Levi Rabinowitz, Treasurer
Salute America Political
Action Committee
1747 Pennsylvania Avenue, NW
Washington, DC 20006

RE: MUR 2526
Salute America Political
Action Committee
Levi Rabinowitz, Treasurer

Dear Mr. Rabinowitz:

The Federal Election Commission received a complaint which alleges that the Salute America Political Action Committee and you, as treasurer, may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2526. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you and the Salute America Political Action Committee in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address, and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

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If you have any questions, please contact Patty Reilly, the attorney assigned to this matter, at (202) 376-8200. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Lawrence M. Noble
Acting General Counsel



By: Lois G. Lerner
Associate General Counsel

Enclosures

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

89040761298



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 12, 1987

Robert A. Kovell, Treasurer
Friends Of Vin Weber
Box 1690
Wilmer, MN 56201

RE: MUR 2526
Friends Of Vin Weber
Robert Kovell, Treasurer

Dear Mr. Kovell:

The Federal Election Commission received a complaint which alleges that Friends Of Vin Weber and you, as treasurer, may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2526. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you and Friends Of Vin Weber in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

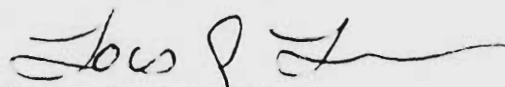
This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address, and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

89040761299

If you have any questions, please contact Patty Reilly, the attorney assigned to this matter, at (202) 376-8200. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Lawrence M. Noble
Acting General Counsel



By: Lois G. Lerner
Associate General Counsel

Enclosures

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

cc: The Honorable Vincent Weber
House Office Building
Washington, DC 20515

80040761300

CCC #4210



August 21, 1987

SALUTE
AMERICA
PAC

Lawrence M. Nobel, Esq.
Acting General Counsel
Federal Election Commission
999 E Street, N.W., Room 657
Washington, D.C. 20463

Re: MUR 2526
Salute America Political
Action Committee
Levi Rabinowitz, Treasurer

7/10/87 15:33

Dear Mr. Nobel:

Allow me to call to your attention that I only received your letter, dated August 12, 1987, today. Therefore, this response is as timely as possible given the circumstance.

Please be advised that I will be out of the country on business beginning August 24, 1987 through September 15, 1987. This business trip cannot be rescheduled.

As you can see, this situation prevents me from properly responding to the matter designated MUR 2526 by the date given in your letter.

Therefore, permit me to request an extension of time in which I would be able to respond and/or retain competent counsel who would respond on behalf of Salute America PAC. I humbly request that you grant me until September 30, 1987 to do so.

Thank you for your consideration in this matter.

Sincerely,

Levi Rabinowitz
Levi Rabinowitz
Treasurer

cc: Lois G. Lerner, Esq.
Patty Reilly, Esq.

1747 Pennsylvania Ave.
Northwest
Suite 1000
Washington, D.C. 20006
202/659-1990

280 Park Avenue
27th Floor
New York, New York
10017

10019204063

BCC # 4285

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

87 SEP -2 8:43

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
87 SEP -2 AM 10:41

August 27, 1987

Federal Election Commission
999 E Street NW
Washington, D.C. 20463

RE: MUR 2526

Dear Sirs:

This letter is in response to complaint MUR 2526 dated August 12, 1987.

The following facts are relevant in this matter:

1. Friends of Vin Weber Committee did receive a \$5,000 contribution from Salute America PAC in October, 1986 but these funds were returned on November 3, 1986. Please see enclosed copy of November, 1986 FEC Report.
2. On November 6, 1986 Congressman Weber wrote a letter to the FEC indicating that he has not been affiliated with Salute America since May, 1985.

In my opinion, no action should be taken against me and Friends of Vin Weber in this matter.

Sincerely,

FRIENDS OF VIN WEBER COMMITTEE

Robert A. Kovell

Robert A. Kovell, Treasurer

cc: Honorable Representative Vin Weber

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RECEIPTS OF RECEIPTS AND DISBURSEMENT For Authorized Committee

(Summary Page)

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM
87 SEP - 2 8:43

1. Name of Committee (in Full) <u>FRIENDS OF VIN WEBER COMMITTEE</u> Address (Number and Street) <u>Box 1690</u> City, State and Zip Code <u>WILLMAR MN 56201</u>	2. FEC Identification Number <u>C001417910</u> 3. Is this Report an Amendment? ☐ YES ☒ NO
--	---

☐ Check if address is different than previously reported.

4. TYPE OF REPORT

☐ April 15 Quarterly Report ☐ July 15 Quarterly Report ☐ October 15 Quarterly Report ☐ January 31 Year End Report ☐ July 31 Mid Year Report (Non-election Year Only)	☐ Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____ ☒ Thirtieth day report following the General Election on <u>11-4-86</u> in the State of <u>MINNESOTA</u> ☐ Termination Report
---	---

This report contains activity for — ☐ Primary Election ☐ General Election ☐ Special Election ☐ Runoff Election

SUMMARY	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period <u>10-16-86</u> through <u>11-24-86</u>		
6. Net Contributions (other than loans)		
(a) Total Contributions (other than loans) (From Line 11 (e))	130,695.30	653,396.00
(b) Total Contribution Refunds (from Line 20 (d)).	6000.00	6,010.00
(c) Net Contributions (other than loans) (subtract Line 6 (b) from 6 (a))	124,695.30	647,386.00
7. Net Operating Expenditures		
(a) Total Operating Expenditures (from Line 17).	215,807.50	753,107.14
(b) Total Offsets to Operating Expenditures (from Line 14).	1750.00	2834.29
(c) Net Operating Expenditures (Subtract Line 7 (b) from 7 (a))	214,057.50	750,272.85
8. Cash on Hand at Close of Reporting Period (from Line 27)	161,986.67	
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)	—	
10. Debts and Obligations Owed BY The Committee (Itemize all on Schedule C or Schedule D)	—	

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

For further information, contact:
 Federal Election Commission
 999 E Street, N.W.
 Washington, D.C. 20463
 Toll Free 800-424-9530
 Local 202-376-3120

Type or Print Name of Treasurer _____

SIGNATURE OF TREASURER _____

Date _____

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

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

FEC FORM 3 (3/80)

**DETAILED SUMMARY PAGE
of Receipts and Disbursements
(Page 2, FEC FORM 3)**

Name of Committee (in Full)

FRIENDS OF VIN WEPER COMMITTEE

Report Covering the Period:

From: 11-1-81

To: 11-25-81

I. RECEIPTS

11. CONTRIBUTIONS (other than loans) FROM:

- (a) Individuals/Persons Other Than Political Committees
(Memo Entry Unitemized \$ 51,402.84)
(b) Political Party Committees.
(c) Other Political Committees
(d) The Candidate.
(e) TOTAL CONTRIBUTIONS (other than loans (add 11(a), 11(b), 11(c)
and 11(d)).

**COLUMN A
Total This Period**

**COLUMN B
Calendar Year-to-Date**

	<u>84416.84</u>	<u>283561.52</u>
	<u>4610.00</u>	<u>13353.10</u>
	<u>41668.46</u>	<u>256481.38</u>
	<u>130645.30</u>	<u>653396.00</u>

11 (a)
11 (b)
11 (c)
11 (d)
11 (e)

12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES.

13. LOANS:

- (a) Made or Guaranteed by the Candidate
(b) All Other Loans
(c) TOTAL LOANS (add 13 (a) and 13 (b)).

13 (a)
13 (b)
13 (c)

14. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)

	<u>1750.00</u>	<u>2834.29</u>
--	----------------	----------------

14

15. OTHER RECEIPTS (Dividends, Interest, etc.)

	<u>1151.37</u>	<u>18110.73</u>
--	----------------	-----------------

15

16. TOTAL RECEIPTS (add 11 (e), 12, 13 (c), 14 and 15)

	<u>133,596.67</u>	<u>674,241.52</u>
--	-------------------	-------------------

16

II. DISBURSEMENTS

17. OPERATING EXPENDITURES

	<u>215,807.50</u>	<u>753,107.14</u>
--	-------------------	-------------------

17

18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES

--	--	--

18

19. LOAN REPAYMENTS:

- (a) Of Loans Made or Guaranteed by the Candidate
(b) Of All Other Loans
(c) TOTAL LOAN REPAYMENTS (add 19 (a) and 19 (b)).

19 (a)
19 (b)
19 (c)

20. REFUNDS OF CONTRIBUTIONS TO:

- (a) Individuals/Persons Other Than Political Committees
(b) Political Party Committees.
(c) Other Political Committees
(d) TOTAL CONTRIBUTION REFUNDS (add 20 (a), 20 (b), and 20 (c)) .

	<u>1000.00</u>	<u>1010.00</u>
	<u>5000.00</u>	<u>5000.00</u>
	<u>6000.00</u>	<u>6010.00</u>

20 (a)
20 (b)
20 (c)
20 (d)

21. OTHER DISBURSEMENTS.

	<u>500.00</u>	<u>8500.00</u>
--	---------------	----------------

21

22. TOTAL DISBURSEMENTS (add 17, 18, 19 (c), 20 (d) and 21)

	<u>222,307.50</u>	<u>767,617.14</u>
--	-------------------	-------------------

22

III. CASH SUMMARY

23. CASH ON HAND AT BEGINNING OF REPORTING PERIOD \$ 250,677.50

23

24. TOTAL RECEIPTS THIS PERIOD (From Line 16) \$ 133,596.67

24

25. SUBTOTAL (Add Line 23 and Line 24) \$ 384,274.17

25

26. TOTAL DISBURSEMENTS THIS PERIOD (From Line 22) \$ 222,307.50

26

27. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (Subtract Line 26 from 25) \$ 161,966.67

27

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SCHEDULE B

ITEMIZED DISBURSEMENTS

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

PAGE 1 OF 1
FOR LINE NUMBER 200

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)

FRIENDS OF VIN WEBER COMMITTEE

A. Full Name, Mailing Address and ZIP Code <i>SALUTE AMERICA PAC</i> <i>280 PARK AVENUE</i> <i>NEW YORK, NY 10017</i>	Purpose of Disbursement <i>REFUND</i> Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) <i>11-3-86</i>	Amount of Each Disbursement This Period <i>5000.00</i>
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)

5000.00

TOTAL This Period (last page this line number only)

5000.00

39090761305

VIN WEBER

2nd District Minnesota

Committees:

Public Works & Transportation

Small Business

Congress of the United States
House of Representatives

NOV 17 1986

November 6, 1986

Mr. Fred Eliand
Press Office
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

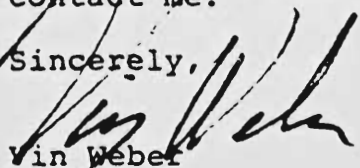
Dear Mr. Eliand:

I am writing to ask that my name be removed from the informal list of candidate PAC's in connection with Salute America PAC.

I have not been officially affiliated with this PAC since May of 1985.

Thank you for your assistance with this matter. If you have any questions, please do not hesitate to contact me.

Sincerely,


Vin Weber
Member of Congress

cc: Morris Talansky
Treasurer--Salute America PAC
Terri Ashmore/File



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 3, 1987

Levi Rabinowitz, Treasurer
Salute America PAC
1747 Pennsylvania Avenue, N.W.
Washington, D.C. 20006

RE: MUR 2526
Salute America PAC
and Levi Rabinowitz,
as treasurer

Dear Mr. Rabinowitz:

The Office of the General Counsel is in receipt of your recent letter requesting a twenty-five day extension of time to respond to the complaint in the above-captioned matter. After reviewing the circumstances detailed in your letter, this Office will grant the requested extension. Accordingly, your response is due no later than September 30, 1987.

If you have any questions, please contact Patty Reilly, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
Acting General Counsel

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

Lois G. Lerner
Associate General Counsel

89040761307

FEDERAL ELECTION COMMISSION
999 E Street, N.W.
Washington, D.C. 20463

SENSITIVE

MUR: 2526
Date Complaint Received
by OGC: 8/5/87
Date of Notifications
to Respondents: 8/12/87
Staff Member: Reilly

87 SEP 11 PM 4:32

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT

FIRST GENERAL COUNSEL'S REPORT

Complainant: Robert Bauer, Esquire
Respondents: Salute America PAC and Levi Rabinowitz,
as treasurer
Friends of Vin Webber and Robert A. Kovell,
as treasurer
Relevant Statutes: 2 U.S.C. § 441a(a)
2 U.S.C. § 432
2 U.S.C. § 441a(a) (8)

Internal Reports Checked: Disclosure Reports

Federal Agencies Checked: None

I. GENERATION OF THE MATTER

The Office of the General Counsel recieved a complaint on August 5, 1987, from Robert Bauer, counsel to the Democratic Congressional Campaign Committee. The complaint alleges that Salute America PAC, a multi-candidate committee registered with the Commission, is affiliated with the Friends of Vin Webber, an authorized committee. This alleged affiliation is said to have resulted in violations of the Act's contribution limitations by persons contributing to both committees. Additionally, the committees are said to have violated the Act's registration and reporting requirements, as well as failed to have reported conduit activity. All respondents were notified of the complaint.

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II. STATUS OF THE MATTER

On September 2, 1987, this Office received a response from the Friends of Vin Webber. Additionally, on August 21, 1987, this Office received a request from Salute America PAC for a twenty-five day extension of time to respond to the complaint. The request noted that the Committee's treasurer would be out of the country until September 15, 1987, and that additional time to respond was needed. Under these circumstances, this Office granted the requested extension. Accordingly, after receiving and evaluating these responses, the Office of the General Counsel will report to the Commission with appropriate recommendations.

Lawrence M. Noble
Acting General Counsel

99040761309
Date

9/11/87

By:


Lois G. Lerner
Associate General Counsel

Attachment
Extension Request

GCC#4456

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

87 SEP 28 PM 5:05

September 28, 1987

Ms. Patty Reilly
Attorney
Federal Election Commission
999 E Street, NW
Washington D.C. 20463

Re: MUR 2526
Salute America
Political Action Committee

Dear Ms. Reilly:

Pursuant to our conversation this afternoon, I wish to formally request an extension until October 31, 1987, in the matter of MUR-2526 Salute America Political Action Committee, for reasons I am about to describe.

1. First, I refer you to my original request for an extension, dated August 21, 1987, and followed by a letter of September 3, 1987, granting that request. At that time, I stated that I was scheduled for a business trip out of the country. That trip included meetings in Israel and meetings in London. That trip took longer than anticipated. Immediately upon my return to the States, I had to leave Washington for California, where again, the meetings went longer than anticipated, bringing me to the second point.

2. When I returned from California, it was already the eve of the Jewish holiday of Rosh Hashana. That took three days out of my schedule, as I am an orthodox Jew.

3. Today, 9/28/87, is my first working day back in the office, and as yet, I have not met with counsel, due to the scheduling problems given above.

4. Friday, 10/2/87 is the eve of the Jewish holiday of Yom Kippur, which means I will be out of the office all of that day. Salute America PAC's attorneys inform me that there is no way for a proper response to be drafted in two days, 9/29--10/1, 1987.

5. Further, Wednesday, 10/7/87 begins yet another Jewish holiday; Sukkot, 10/7--10/10/87.

6. On Monday, 10/12/87, I am scheduled to leave for Israel, where it is my honor to host an official of our government for meetings with Israel's leaders and a tour of that country. There, we will observe the last two days of the Sukkot holiday, known as Shemini Azeret, and Simchat Torah.

con't.



Page 2
Ms. Patty Reilly
Re: MU 2526

7. I expect to return to the States on or about 10/22/87, barring any unforeseen difficulties.

Therefore, may I respectfully request that in order to have the proper advice of counsel, and due to the overwhelming scheduling problems outlined above, that the Commission grant an extension until 10/31/87, in the MUR 2526 matter.

I greatly appreciate your consideration in this matter and look forward to our speaking again on 10/6/87, as you advised.

Sincerely,

Levi Rabinowitz
Levi Rabinowitz
Treasurer



8 9 0 4 0 7 6 1 3 1 1

POSITIVE

RECEIVED COMMISSION
FEDERAL ELECTION
SECRETARIAT
87 OCT -2 PM 4:09

GENERAL COUNSEL'S REPORT

39090761312

On September 2, 1987, the Friends of Vin Weber filed its response. On August 21, 1987, Levi Rabinowitz, treasurer of Salute America PAC, requested and received a twenty-five day extension of time until September 30, 1987 to respond.^{*/} Subsequently, on September 28, 1987, Mr. Rabinowitz contacted this Office to request a second extension of time. When staff explained that this request must be presented to the Commission for approval, the attached extension request was submitted.

In support of this request, Mr. Rabinowitz notes he was delayed in the travels cited in his previous extension

*/ This Office informed the Commission of this extension in a General Counsel's Report dated September 14, 1987.

request and did not return to his office until later than expected. Moreover, he notes that the press of religious holidays and other planned travel abroad has prevented him from personally conferring with counsel. Accordingly, he requests an additional extension of time until October 31, 1987, to respond to the complaint in this matter.

This Office recommends that the Commission grant this extension request. Sufficient good cause to support this request has been demonstrated. Additionally, waiting to proceed until Salute America PAC responds will assist the Commission in resolving the factual issues raised in the complaint.

III. RECOMMENDATIONS

1. Approve an extension of time until October 31, 1987, for the Salute America PAC and Levi Rabinowitz, as treasurer.
2. Approve the attached letter.

Date

10/2/87

Lawrence M. Noble
Acting General Counsel

Attachments

1. Extension Request
2. Proposed Letter

37040761313



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20461

MEMORANDUM TO: LAWRENCE M. NOBLE
ACTING GENERAL COUNSEL

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

DATE: OCTOBER 6, 1987

SUBJECT: OBJECTION TO MUR 2526 - General Counsel's Report
Signed October 2, 1987

The above-captioned document was circulated to the Commission on Monday, October 5, 1987 at 11:00 A.M.

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

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

This matter will be placed on the Executive Session agenda for October 20, 1987.

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

89040761314

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Salute America PAC and Levi) MUR 2526
Rabinowitz, as treasurer)
Friends of Vin Weber)
and Robert Kovell, as treasurer)

CERTIFICATION

I, Mary W. Dove, recording secretary for the Federal Election Commission executive session on October 20, 1987, do hereby certify that the Commission decided by a vote of 5-1 to take the following actions on MUR 2526:

1. Approve an extension of time until October 31, 1987, for the Salute America PAC and Levi Rabinowitz, as treasurer.
2. Approve the letter attached to the General Counsel's Report dated October 2, 1987.

Commissioners Aikens, Elliott, Josefiak, McDonald, and McGarry voted affirmatively. Commissioner Thomas dissented.

Attest:

10-21-87

Date

Mary W. Dove

Mary W. Dove
Administrative Assistant

39040761315



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

27 October 1987

Levi Rabinowitz, Treasurer
Salute America PAC
1747 Pennsylvania Avenue, N.W.
Washington, D.C. 20006

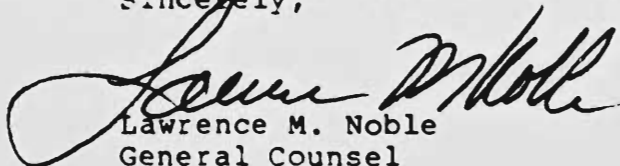
RE: MUR 2526
Salute America PAC and Levi
Rabinowitz, as treasurer

Dear Mr. Rabinowitz:

On October 20, 1987, the Commission considered your request for an extension of time in the above-captioned matter and determined to grant this request. Accordingly, your response is due no later than October 31, 1987.

If you have any questions, please contact Patty Reilly, the attorney assigned to this matter, at 376-5690.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lawrence M. Noble".
Lawrence M. Noble
General Counsel

89040761310

LAW OFFICES
MARTIN MENDELSON
SUITE 1100
1700 K STREET, N. W.
WASHINGTON, D. C. 20006
(202) 833-1893

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

87 NOV -3 AM 11:15

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
87 NOV -3 PM 12:07

October 30, 1987

Lois G. Lerner
Associate General Counsel
Federal Election Commission
999 East Street, N.W.
Washington, D.C. 20463

Re: MUR 2526
Salute America
Political Action Committee
Levi Rabinowitz, Treasurer

Dear Ms. Lerner:

This office was retained by Mr. Levi Rabinowitz today in connection with your letter to him, dated August 12, 1987, enclosing a letter alleging violations of the 2 U.S.C. §431 et seq.

As a preliminary matter, I wish to bring to your attention the fact that the complaining letter is short on facts and itself fails to comply with the provisions of 11 C.F.R. §111.4 in that it, inter alia, does not "clearly identify. . . each person or entity who is alleged to have committed a violation" as required by 11 C.F.R. §111.4(d)(2); does not contain "an identification of the source of information which gives rise to the complainants belief in the truth of such statements" as required by 11 C.F.R. §111.4(d)(3), does not contain "clear and concise recitation of the facts which describe a violation" of the law as required by 11 C.F.R. §111.4(d)(3) and is unaccompanied by "any documentation supporting the facts" as required by 11 C.F.R. §111.4(d)(4), save some newspaper articles undoubtedly generated by the complainant or its unsuccessful candidate.

The Salute America PAC was formed in New York City in 1985 to support conservative Republican candidates. Its relationship to Congressman Vin Weber may be described as tangential at best. The Salute America PAC was never "Congressman Weber's PAC". It was designed to become a multi-candidate PAC to provide the maximum allowable financial support to conservative candidates; it has not yet met its goal.

87040761317

Lois G. Lerner
October 30, 1987
Page 2

The vagueness and conclusory language of most of the alleged "legal violations" make it hard to respond in a logical or coherent fashion but we will attempt to respond seriatim.

1. Salute America was not established as, and is not now, an affiliated committee of the Weber for Congress Committee, therefore the allegation of a violation of "2 U.S.C. §§422 and 432" is simply not true and, even if the premise were true, for the purposes of pleading, the allegations are too vague and therefore are denied.

2. The premise of this allegation is the affiliated nature of Salute America and Weber for Congress. As the allegation is based on a false premise (see the response in paragraph 1) it is denied.

3. This allegation is factually deficient; we do not understand the charge. To the extent that we think we understand it, we deny it.

4. Reports were filed in a tardy manner. This is admitted with regret and a promise by Mr. Rabinowitz to file timely reports in the future.

As Mr. Rabinowitz will endeavor to file his future reports in a timely manner and as there is no basis for the other allegations in either fact or law we ask that the Complaint be dismissed by the Commission.

Sincerely,


Martin Mendelsohn

MM:jpn

8 9 0 4 0 7 6 1 3 1 3

I, Levi Rabinowitz, being first duly sworn, depose and say as follows:

1. In 1985, I became the Treasurer of the Salute America PAC.

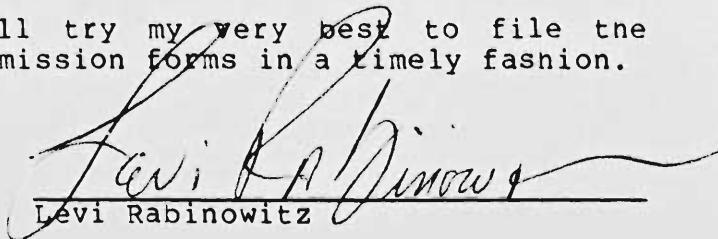
2. Salute America PAC was formed in New York City by Republicans and Conservatives who wanted to support the election of conservatives to the House and Senate.

3. The purpose of Salute America PAC was to become a multi-candidate PAC.

4. Congressman Vin Weber was a recipient of a contribution from the Salute America PAC, which was returned to the PAC by the Congressman's election committee.

5. Salute America was not formed by and is not now "Vin Weber's PAC" or affiliated with the "Weber for Congress Committee".

6. In the future I will try my very best to file the required Federal Election Commission forms in a timely fashion.


Levi Rabinowitz

Before me, the undersigned Notary Public, on this day personally appeared Levi Rabinowitz, known to me to be the person whose name is subscribed to the foregoing instrument, and acknowledged to me that he executed said instrument for the purposes therein expressed, and that the statements contained therein are true and correct.

Given under my hand and seal of office this 30th day of October, 1987.


Glorinda Y. Frost

89040761319

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2526

NAME OF COUNSEL: Martin Mendelsohn

ADDRESS: Suite 1100

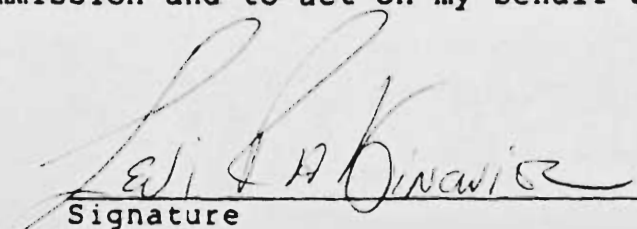
1700 K Street, N.W.

Washington, D.C. 20006

TELEPHONE: (202) 833-1893

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.

October 30, 1987
Date


Signature

RESPONDENT'S NAME: Levi Rabinowitz

ADDRESS: Suite 1000

1747 Pennsylvania Avenue, N.W.

Washington, D.C. 20006

HOME PHONE: _____

BUSINESS PHONE: (202) 659-1990

87090701320

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 24 February 1988

ANALYST: Robert B. DiNardo

I. COMMITTEE: Salute America Political Action
Committee (C00194837)
Levi Rabinowitz, Treasurer
(11/8/85 - present)
Arnold I. Burns, Treasurer
(3/14/85-11/7/85)
1747 Pennsylvania Avenue, NW¹/
Washington, DC 20006

II. RELEVANT STATUTE: 2 U.S.C. §434(a)(4)(A)(i),
(iii) and (iv)
11 CFR 104.5(c)(1)(i) and (iii)
11 CFR 104.5(c)(2)(i)(B)

III. BACKGROUND:

Late/Non-Filing of Reports

The Salute America Political Action Committee ("the Committee") failed to file four reports by Election Day, November 4, 1986. Additionally, the Committee failed to file two reports. The late reports are the 1985 Year End, 1986 April Quarterly, 1986 July Quarterly, and 1986 October Quarterly Reports. The non-filed reports are the 1986 30 Day Post-General and 1986 Year End Reports. Prior Notices were sent to the Committee for all of the above-mentioned reports (Attachment 2).

On January 23, 1987, a Non-Filer Notice was sent to the Committee for its failure to file the 1985 Year End, 1986 April Quarterly, 1986 July Quarterly, 1986 October Quarterly and 1986 30 Day Post-General Reports (Attachment 3).

¹/ The previous address of record was 200 West 57th Street, Suite 301, New York, NY 10019. The Commission was unaware of the change of address until the filing of reports on March 9, 1987.

89040761321

SALUTE AMERICA POLITICAL ACTION COMMITTEE
REPORTS ANALYSIS OGC REFERRAL
PAGE 2

On March 9, 1987, the Committee filed its 1985 Year End^{2/}, 1986 April Quarterly, 1986 July Quarterly, and 1986 October Quarterly Reports (Attachment 4). The Committee also notified the Commission that a report covering the last quarter of 1986 was being prepared (Attachment 5).

In a letter dated March 17, 1987, the Committee again notified the Commission that a report covering the last quarterly of 1986 was being prepared and would be filed (Attachment 6). The letter noted that the Committee had received the RFAIs late due to the address change; it also stated that the current treasurer had not received the Committee's books and records at the time of his appointment.

On June 9, 1987, a Non-Filer Notice was sent to the Committee for its failure to file the 1986 Year End Report (Attachment 7).

On May 26, 1987, the Committee filed its 1987 April Quarterly Report which showed a beginning cash-on-hand balance of \$2,777.90, and outstanding debts owed by the Committee totalling \$70,500 (Attachment 8).

On November 24, 1987, a Request for Additional Information ("RFAI") was sent to the Committee notifying it of a cash discrepancy between the Committee's ending cash balance on its last 1986 report and the beginning cash balance on its 1987 April Quarterly Report. The RFAI requested that the Committee file its 1986 30 Day Post-General and 1986 Year End Reports (Attachment 9). A Second Notice was sent December 17, 1987 for failure to respond to the initial RFAI (Attachment 10).

On January 20, 1988, the Reports Analysis Division ("RAD") analyst attempted to reach the treasurer, Levi Rabinowitz. Mr. Rabinowitz was not available so the RAD analyst left a message (Attachment 11). On January 21, 1988 Mr. Rabinowitz returned the call. Mr. Rabinowitz said he was having difficulty getting the bookkeeper who filed the original reports to respond to the RFAI because the Committee had no money with which to pay her. Mr. Rabinowitz asked if he could have more time to contact the bookkeeper again. The RAD analyst told Mr. Rabinowitz that a response was needed before February 1, 1988 or else the matter would be referred to the Office of General Counsel. Mr. Rabinowitz said he would try to respond before February 1, 1988 (Attachment 12).

^{2/} The Committee filed an October Quarterly Report covering July 1, 1985 to September 30, 1985, and a Year End Report covering October 1, 1985 to December 31, 1985.

89040761322

SALUTE AMERICA POLITICAL ACTION COMMITTEE
REPORTS ANALYSIS OGC REFERRAL
PAGE 3

As of this date, the 1986 30 Day Post-General and 1986
Year End Reports have not been filed.

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

33040761323

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FEDERAL ELECTION COMMISSION
1985-1986

DATE 9FEB88

COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
				TYPE OF FILER		
SALUTE AMERICA POLITICAL ACTION COMMITTEE				ID #C00194837	NON-PARTY NON-QUALIFIED	
CONNECTED ORGANIZATION: NONE						
1985	STATEMENT OF ORGANIZATION			18MAR85	3	85FEC/369/0751
	REQUEST FOR ADDITIONAL INFORMATION			26JUN85	1	85FEC/376/5418
	STATEMENT OF ORGANIZATION - AMENDMENT			31JUL85	3	85FEC/384/4237
	STATEMENT OF ORGANIZATION - AMENDMENT			8NOV85	3	85FEC/390/5451
	REQUEST FOR ADDITIONAL INFORMATION 2ND			18JUL85	2	85FEC/379/4800
	MID-YEAR REPORT	25,495	23,084	14MAR85 -30JUN85	12	85FEC/384/4240
	OCTOBER QUARTERLY	0	1,500	1JUL85 -30SEP85	4	87FEC/462/1863
	YEAR-END	0	0	1OCT85 -31DEC85	2	87FEC/462/1868
	NOTICE OF FAILURE TO FILE			1JUL85 -31DEC85	1	87FEC/453/0274
1986	APRIL QUARTERLY	0	800	1JAN86 -31MAR86	3	87FEC/462/1871
	NOTICE OF FAILURE TO FILE			1JAN86 -31MAR86	1	87FEC/453/0275
	JULY QUARTERLY	0	0	1APR86 -30JUN86	2	87FEC/462/1875
	NOTICE OF FAILURE TO FILE			1APR86 -30JUN86	1	87FEC/453/0276
	OCTOBER QUARTERLY	0	0	1JUL86 -30SEP86	2	87FEC/462/1878
	NOTICE OF FAILURE TO FILE			1JUL86 -30SEP86	1	87FEC/453/0277
	NOTICE OF FAILURE TO FILE			1OCT86 -24NOV86	1	87FEC/453/0278
	NOTICE OF FAILURE TO FILE			25NOV86 -31DEC86	1	87FEC/469/1630
1987	MISCELLANEOUS REPORT TO FEC			19MAR87	3	87FEC/463/2909
TOTAL		25,495	0 25,384	0	46	TOTAL PAGES

All reports have been reviewed

Ending cash on hand as of 9/30/86: \$110.32

Outstanding debts and obligations owed by the committee as of 9/30/86: \$0

8 9 0 4 0 7 6 1 3 2 5

FEDERAL ELECTION COMMISSION
1987-1988

DATE 28JAN88

COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES TYPE OF FILER	MICROFILM LOCATION
SALUTE AMERICA POLITICAL ACTION COMMITTEE				ID #C00194837	NON-PARTY NON-QUALIFIED	
CONNECTED ORGANIZATION: NONE						
	1987 APRIL QUARTERLY	10,500	12,869	1JAN87 -31MAR87	9	87FEC/468/2416
	REQUEST FOR ADDITIONAL INFORMATION			1JAN87 -31MAR87	4	87FEC/495/0737
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN87 -31MAR87	1	87FEC/496/1816
	JULY QUARTERLY	1,600	1,833	1APR87 -30JUN87	8	87FEC/492/4615
	REQUEST FOR ADDITIONAL INFORMATION			1APR87 -30JUN87	1	87FEC/495/0735
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1APR87 -30JUN87	6	87FEC/496/1810
	TOTAL	12,100	0 14,702	0	29	TOTAL PAGE

All reports listed have been reviewed

Ending cash on hand as of 6/30/87: \$174.48

Outstanding debts and obligations owed by the committee as of 6/30/87: \$70,500

YEAR-END REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

December 20, 1985

WHO MUST FILE

ALL PARTY COMMITTEES, NON-CONNECTED COMMITTEES, AND SEPARATE SEGREGATED FUNDS must file a year-end report by January 31, 1986.

WHAT MUST BE REPORTED

The report must disclose all financial activity that occurred from the close of books for the last report through December 31, 1985. Political committees which have not previously filed a financial disclosure report should report all financial activity from the date of registration* through December 31, 1985. For more detailed instructions, consult your campaign guide.

FILING DATE

Reports sent by registered or certified mail must be postmarked no later than midnight January 31, 1986. Reports hand delivered or mailed first class must be received no later than close of business January 31, 1986.

WHERE TO FILE

Committees should consult the instructions on the enclosed FEC Form 3X for details.

COMPLIANCE

Political committees are fully liable for failure to file any report required under the Act. Failure to file in a timely fashion is also a serious violation. Offending committees are subject to enforcement action. Committees must also submit legible reports which can be clearly reproduced. Illegible reports and reports submitted on non-FEC forms will not be accepted, and committees filing such documents will be required to refile.

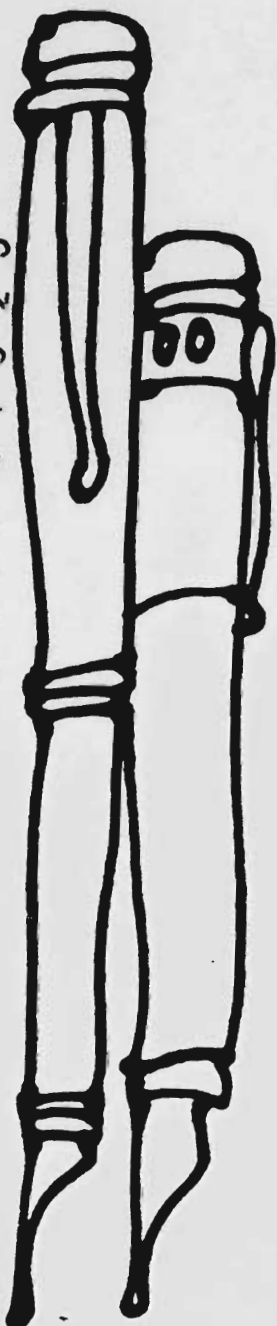
1986 FILING REQUIREMENTS

See the January 1986 issue of the FEC Record for filing requirements during 1986. A committee that wishes to change its reporting schedule (e.g. from semiannually in 1985 to monthly—rather than quarterly in 1986) must notify the Commission by submitting a letter with the next report due under its current reporting schedule.

*The first report filed by a committee shall include all amounts received or disbursed prior to becoming a political committee, even if such amounts were not received during the current reporting period. See 11 CFR 104.3(a) and (b).

FOR INFORMATION CALL: Information Services Division
202/523-4068 or 800/424-9530

89040761326



QUARTERLY REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

March 21, 1986

WHO MUST FILE

ALL Party Committees, Non-connected Committees and Separate Segregated Funds, except those filing monthly (see below), must file a quarterly report by April 15, 1986.

WHAT MUST BE REPORTED

The report must disclose all financial activity that occurred from the close of books for last report filed through March 31, 1986. Political committees that have not previously filed a financial disclosure report should report all financial activity through March 31, 1986.* For more detailed instructions, consult your campaign guide.

WHEN TO FILE

Reports sent by registered or certified mail must be postmarked no later than midnight April 15, 1986. Reports hand delivered or mailed first class must be received no later than close of business April 15, 1986.

WHERE AND HOW TO FILE

Committees should consult the instructions on the enclosed FEC Form 3X for details.

MONTHLY FILERS

Committees that file on a monthly schedule must file their next report by April 20, 1986, and disclose all financial activity of their committee from March 1 through March 31, 1986. (See the schedule of monthly reports on the reverse side.)

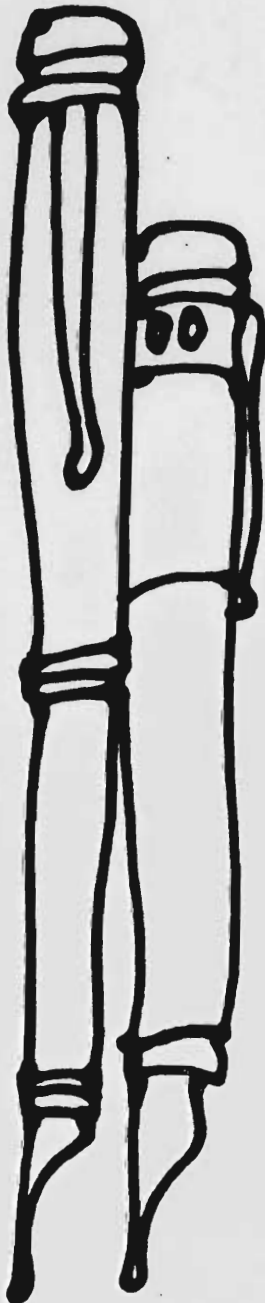
COMPLIANCE

Political committees are fully liable for failure to file any report required under the Act. Failure to file in a timely fashion is also a serious violation. Offending committees are subject to enforcement action. Committees must also submit legible reports which can be clearly reproduced. Illegible reports and reports submitted on non-FEC forms will not be accepted, and committees filing such documents will be required to refile.

*The first report filed by a committee shall include all amounts received or disbursed prior to becoming a political committee, even if such amounts were not received or disbursed during the current reporting period. See 11 CFR 104.3(a) and (b).

-over-

89040761327



REMINDERS**QUARTERLY FILERS**

Committees that make contributions or expenditures (including independent expenditures) in connection with an election, must file a pre-election report if this activity has not been previously disclosed. See the January 1986 issue of the Federal Election Commission Record for primary election filing requirements.

MONTHLY FILERS

Committees that file monthly must follow the schedule below. Pre-general election reports sent by registered or certified mail must be postmarked no later than midnight October 20, 1986. All other reports sent by registered or certified mail must be postmarked no later than midnight on the filing date in order to be timely. Reports hand delivered or mailed first class must be received by close of business on the filing date.

REPORT	PERIOD COVERED		FILING DATE
February	01/01	- 01/31	02/20/86
March	02/01	- 02/28	03/20/86
April	03/01	- 03/31	04/20/86
May	04/01	- 04/30	05/20/86
June	05/01	- 05/31	06/20/86
July	06/01	- 06/30	07/20/86
August	07/01	- 07/31	08/20/86
September	08/01	- 08/31	09/20/86
October	09/01	- 09/30	10/20/86
Pre-election	10/01	- 10/15	10/23/86
Post-election	10/16	- 11/24	12/04/86
Year-End	11/25	- 12/31	01/31/87

INDEPENDENT EXPENDITURES

Any independent expenditure aggregating \$1,000 or more and made between 2 and 20 days before an election must be reported within 24 hours after the expenditure is made. See 11 CFR 104.4(c)(2) and (3) for information concerning where to file.

FOR INFORMATION CALL: Information Services Division
800/424-9530 or 202/376-3120

89040761328

QUARTERLY REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

June 20, 1986

WHO MUST FILE

All Party Committees, Nonconnected Committees and Separate Segregated Funds, except those that file monthly (see below), must file a quarterly report by July 15, 1986.

WHAT MUST BE REPORTED

The report must disclose all financial activity that occurred from the close of books for the last report filed through June 30, 1986. Political committees that have not previously filed a financial disclosure report should report all financial activity through June 30, 1986.* For more detailed instructions, consult your campaign guide.

WHEN TO FILE

Reports sent by registered or certified mail must be postmarked no later than midnight July 15, 1986. Reports hand delivered or mailed first class must be received no later than close of business July 15, 1986.

WHERE AND HOW TO FILE

Committees should consult the instructions on the enclosed FEC Form 3X for details.

MONTHLY FILERS

Committees that file on a monthly schedule must file their next report by July 20, 1986, and disclose all financial activity of their committee from June 1 through June 30, 1986. (See the schedule of monthly reports on the reverse side.)

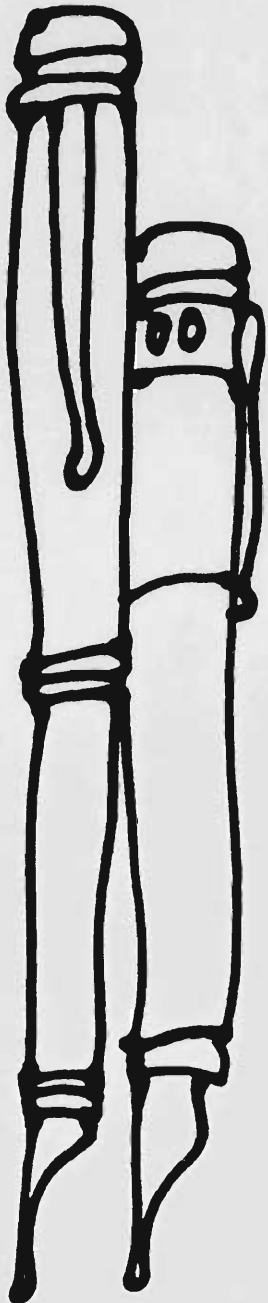
COMPLIANCE

Political committees are fully liable for failure to file any report required under the Act. Failure to file in a timely fashion is also a serious violation. Offending committees are subject to enforcement action. Committees must also submit legible reports which can be clearly reproduced. Illegible reports and reports submitted on non-FEC forms will not be accepted, and committees filing such documents will be required to refile.

*The first report filed by a committee shall include all amounts received or disbursed prior to becoming a political committee, even if such amounts were not received or disbursed during the current reporting period. See 11 CFR 104.3(a) and (b).

-over-

89040761329



REMINDERS**QUARTERLY FILERS**

Committees that make contributions or expenditures (including independent expenditures) in connection with an election, must file a pre-election report, if this activity has not been previously disclosed. See the January 1986 issue of the Federal Election Commission Record for primary election filing requirements.

MONTHLY FILERS

Committees that file monthly reports must follow the schedule below. Pre-general election reports sent by registered or certified mail must be postmarked no later than mid-night October 20, 1986. All other reports sent by registered or certified mail must be postmarked no later than midnight on the filing date in order to be timely. Reports hand delivered or mailed first class must be received by close of business on the filing date.

REPORT	PERIOD COVERED	FILING DATE
February	01/01 - 01/31	02/20/86
March	02/01 - 02/28	03/20/86
April	03/01 - 03/31	04/20/86
May	04/01 - 04/30	05/20/86
June	05/01 - 05/31	06/20/86
July	06/01 - 06/30	07/20/86
August	07/01 - 07/31	08/20/86
September	08/01 - 08/31	09/20/86
October	09/01 - 09/30	10/20/86
Pre-election	10/01 - 10/15	10/23/86
Post-election	10/16 - 11/24	12/04/86
Year-End	11/25 - 12/31	01/31/87

INDEPENDENT EXPENDITURES

Any independent expenditure aggregating \$1,000 or more and made between 2 and 20 days before an election must be reported within 24 hours after the expenditure is made. See 11 CFR 104.4(c) (2) and (3) for information concerning where to file.

FOR INFORMATION CALL: Information Services Division
800/424-9530 or 202/376-3120

89040761330

QUARTERLY REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

September 19, 1986

WHO MUST FILE

ALL Party Committees, Nonconnected Committees and Separate Segregated Funds, except those that file monthly (see below), must file a quarterly report by October 15, 1986.

WHAT MUST BE REPORTED

The report must disclose all financial activity that occurred from the close of books for the last report filed through September 30, 1986. Political committees that have not previously filed a financial disclosure report should report all financial activity through September 30, 1986.* For more detailed instructions, consult your campaign guide.

WHEN TO FILE

Reports sent by registered or certified mail must be postmarked no later than midnight October 15, 1986. Reports hand delivered or mailed first class must be received no later than close of business October 15, 1986.

WHERE AND HOW TO FILE

Committees should consult the instructions on the enclosed FEC Form 3X for details.

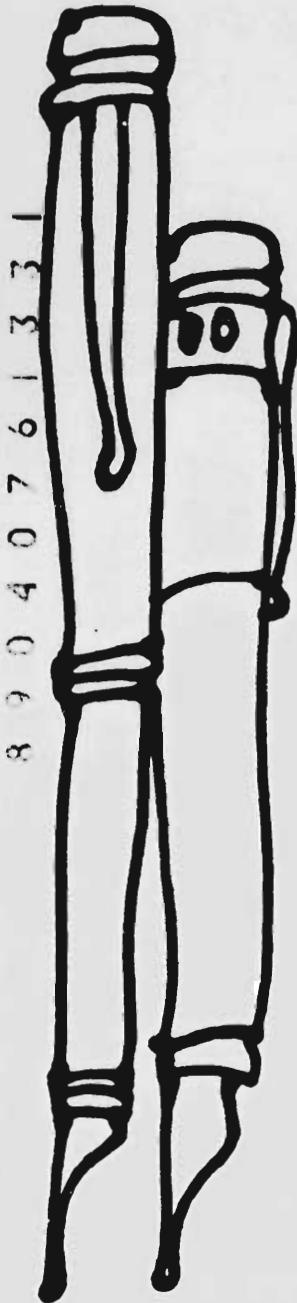
MONTHLY FILERS

Committees that file on a monthly schedule must file their next report by October 20, 1986, and disclose all financial activity from September 1 through September 30, 1986. (See Monthly Filers on the reverse side.)

COMPLIANCE

Political committees are fully liable for failure to file any report required under the Act. Failure to file in a timely fashion is also a serious violation. Offending committees are subject to enforcement action. Committees must also submit legible reports which can be clearly reproduced. Illegible reports and reports submitted on non-FEC forms will not be accepted, and committees filing such documents will be required to refile.

*The first report filed by a committee shall include all amounts received or disbursed prior to becoming a political committee, even if such amounts were not received or disbursed during the current reporting period. See 11 CFR 104.3(a) and (b).



REMEMBERS**QUARTERLY FILERS**

Committees that make contributions or expenditures (including independent expenditures) in connection with an election, and coordinated party expenditures in connection with a general election, must file a pre-election report if this activity has not been previously disclosed. See the January 1986 issue of the Federal Election Commission Record for primary and general election filing requirements.

MONTHLY FILERS

Committees that are filing monthly must file a pre-general election report due on October 23, a post-general election report due on December 24, and a year-end report due January 31, 1987, instead of monthly reports on November 20, December 20 and January 20, 1987. See the schedule below.

<u>REPORT</u>	<u>PERIOD COVERED</u>	<u>REG./CERT. MAILING DATE</u>	<u>FILING DATE</u>
Pre-general	10/01 - 10/15	10/20/86	10/23/86
Post-general	10/16 - 11/24	12/24/86	12/24/86
Year-end	11/25 - 12/31	01/31/87	01/31/87

See General Election Notice

INDEPENDENT EXPENDITURES

Any independent expenditure aggregating \$1,000 or more and made between 2 and 20 days before an election must be reported within 24 hours after the expenditure is made. See 11 CFR 104.4(c) (2) and (3) for information concerning where to file.

A notice explaining general election filing requirements will be sent to you before the general election.

FOR INFORMATION CALL: Information Services Division
800/424-9530 or 202/376-3120

89040761332

GENERAL ELECTION REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

September 29, 1986

WHO MUST FILE THE PRE-GENERAL ELECTION REPORT

ALL COMMITTEES that file monthly reports must file the pre-general election report due October 23, 1986.

All COMMITTEES that file quarterly that have made contributions or expenditures (including independent expenditures and coordinated party expenditures) in connection with the general election must file a pre-election report, if such activity has not previously been reported. See below for post-general filing information.

WHAT MUST BE REPORTED

Quarterly filers must disclose all financial activity from the close of books of the last report, or from the date of registration* (whichever is later), through October 15, 1986. (Monthly filers must disclose all financial activity from October 1 or from the date of registration* (whichever is later), through October 15, 1986.) For more detailed instructions, consult your campaign guide.

WHEN TO FILE

Pre-general election reports sent registered or certified mail must be postmarked no later than midnight October 20, 1986. Reports hand delivered or mailed first class must be received no later than close of business October 23, 1986.

WHO MUST FILE THE POST-GENERAL ELECTION REPORT

ALL COMMITTEES must file the post-general election report due December 4, 1986, regardless of election activity.

WHAT MUST BE REPORTED

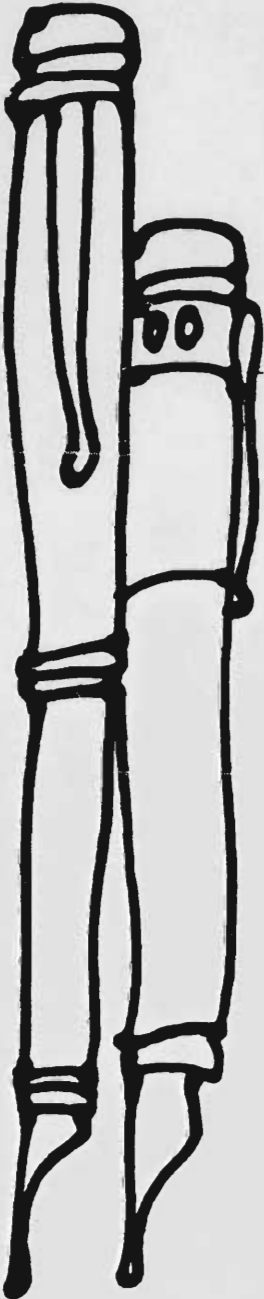
The report must disclose all financial activity from the close of books of the last report, or the date of registration* (whichever is later), through November 24, 1986.

WHEN TO FILE

Post-general election reports sent by registered or certified mail must be postmarked no later than midnight December 4, 1986. Reports hand delivered or mailed first class must be received no later than close of business December 4, 1986.

*The first report filed by a committee shall include all amounts received or disbursed prior to becoming a political committee, even if such amounts were not received or disbursed during the current reporting period. See 11 CFR 104.3(a) and (b).

89040761333



QUARTERLY FILERS

<u>Name of Report</u>	<u>Period Covered</u>	<u>Reg./Cert. Mailing Date</u>	<u>Filing Date</u>
Oct. Quarterly	07/01 ^{1/} - 09/30	10/15/86	10/15/86
Pre-General	10/01 - 10/15	10/20/86	10/23/86
Post-General ^{2/}	10/16 - 11/24	12/04/86*	12/04/86*
Year-End	11/25 - 12/31	01/31/87	01/31/87

MONTHLY FILERS

<u>Name of Report</u>	<u>Period Covered</u>	<u>Reg./Cert. Mailing Date</u>	<u>Filing Date</u>
Oct. Monthly	09/01 ^{1/} - 09/30	10/20/86	10/20/86
Pre-General	10/01 - 10/15	10/20/86	10/23/86
Post-General	10/16 - 11/24	12/04/86*	12/04/86*
Year-End	11/25 - 12/31	01/31/87	01/31/87

*Follow these dates for mailing and filing the post-general report. Disregard dates shown on the October Quarterly Report Notice dated September 19, 1986.

INDEPENDENT EXPENDITURES

Any independent expenditure aggregating \$1,000 or more and made between 2 and 20 days before an election must be reported within 24 hours after the expenditure is made. See 11 CFR 104.4(c)(2) and (3) for information concerning where to file.

WHERE AND HOW TO FILE

Committees should consult the instructions on the enclosed FEC Form 3X, for details.

COMPLIANCE

Political committees are fully liable for failure to file any report required under the Act. Failure to file in a timely fashion is also a serious violation. Offending committees are subject to enforcement action. Committees must also submit legible reports which can be clearly reproduced. Illegible reports and reports submitted on non-FEC forms will not be accepted, and committees filing such documents will be required to refile.

^{1/}Or from date of registration, or the close of books of the last report filed, whichever is later.

^{2/}Reports filed by committees that did not file the pre-general election report should cover all financial activity from the closing date of the last report or from the date of registration (whichever is later), through November 24, 1986. See the footnote on the reverse side.

FOR INFORMATION CALL: Information Services Division
800/424-9530 or 202/376-3120

89040701334

YEAR-END REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

December 26, 1986

WHO MUST FILE

ALL PARTY COMMITTEES, NONCONNECTED COMMITTEES, AND SEPARATE SEGREGATED FUNDS must file a year-end report by January 31, 1987.

WHAT MUST BE REPORTED

The report must disclose all financial activity that occurred from the close of books for the last report through December 31, 1986. Political committees that have not previously filed a financial disclosure report should report all financial activity through December 31, 1986.* For more detailed instructions, consult your Campaign Guide.

FILING DATE

Reports sent by registered or certified mail must be postmarked no later than midnight January 31, 1987. Reports hand delivered or mailed first class must be received no later than close of business January 31, 1987.

WHERE TO FILE

Committees should consult the instructions on the enclosed FEC Form 3X for details.

COMPLIANCE

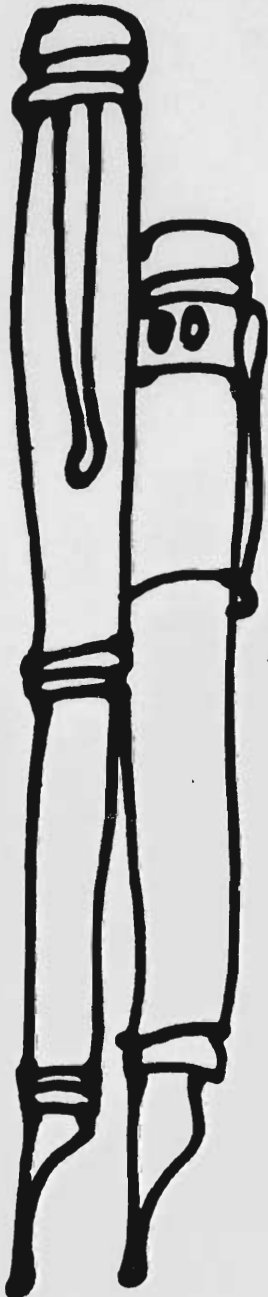
Political committees are fully liable for failure to file any report required under the Act. Failure to file in a timely fashion is also a serious violation. Offending committees are subject to enforcement action. Committees must also submit legible reports which can be clearly reproduced. Illegible reports and reports submitted on non-FEC forms will not be accepted, and committees filing such documents will be required to refile.

*The first report filed by a committee shall include all amounts received or disbursed prior to becoming a political committee, even if such amounts were not received during the current reporting period. See 11 CFR 104.3(a) and (b).

FOR INFORMATION CALL: Information Services Division
202/376-3120 or 800/424-9530

(over)

89040761335



1987 FILING SCHEDULE FOR PARTIES AND PACS

Committees may file reports on a semiannual or a monthly schedule during 1987. Committees that choose to file reports on a monthly schedule must file reports no later than the 20th day of the month. Each report must include all financial activity that occurred during the previous month. Committees that choose to file reports on a semiannual schedule must file a mid-year report by July 31, 1987, and a year-end report by January 31, 1988. The July 31 mid-year report should include all activity from January 1 through June 30, 1987. The year-end report should include all activity from July 1 through December 31, 1987. See the charts below.

Committees that wish to change their reporting schedule must notify the Commission by sending a letter with the next report due under their current reporting schedule. Committees may change their filing frequency only once a year.

MONTHLY FILERS*

Report	Period Covered**	Reg./Cert. Mailing Date	Filing Date
Year-End	11/25 - 12/31	01/31/87	01/31/87
February	01/01 - 01/31	02/20/87	02/20/87
March	02/01 - 02/28	03/20/87	03/20/87
April	03/01 - 03/31	04/20/87	04/20/87
May	04/01 - 04/30	05/20/87	05/20/87
June	05/01 - 05/31	06/20/87	06/20/87
July	06/01 - 06/30	07/20/87	07/20/87
August	07/01 - 07/31	08/20/87	08/20/87
September	08/01 - 08/31	09/20/87	09/20/87
October	09/01 - 09/30	10/20/87	10/20/87
November	10/01 - 10/31	11/20/87	11/20/87
December	11/01 - 11/30	12/20/87	12/20/87
Year-End	12/01 - 12/31	01/31/88	01/31/88

SEMIANNUAL FILERS*

Report	Period Covered**	Reg./Cert. Mailing Date	Filing Date
Year-End	11/25 - 12/31	01/31/87	01/31/87
July 31 Mid-Year	01/01 - 06/30	07/31/87	07/31/87
Year-End	07/01 - 12/31	01/31/88	01/31/88

*Be sure to retain this Report Notice for future reference. The next Notice will be sent July 7, 1987. See also the January 1987 issue of the FEC Record.

**Each report must disclose all financial activity that occurred from the close of books for the last report filed through the end of the reporting period. Political committees that have not previously filed a financial disclosure report should report all financial activity through the end of the reporting period. See the footnote on page 1.

89040761336



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

BQ-7

JAN 6 1987

Levi Rabinowitz, Treasurer
Salute America Political
Action Committee
200 West 57th Street, Suite 301
New York, NY 10019

Identification Number: C00194837

Reference: 1985 Year End (7/1/85-12/31/85), April Quarterly
(1/1/86-3/31/86), July Quarterly (4/1/86-6/30/86),
October Quarterly (7/1/86-9/30/86) and 30 Day Post-
General (10/1/86-11/24/86) Reports

Dear Mr. Rabinowitz:

It has come to the attention of the Federal Election Commission ("the Commission") that your committee may be in violation of 2 U.S.C. §434(a) for failing to file the above referenced Reports of Receipts and Disbursements. You were notified previously of the due dates for these reports.

It is important that you file these reports immediately with the Federal Election Commission, 999 E Street, NW, Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). Copies of the reports or the relevant portions should also be filed with the Secretary of State or equivalent State officer. See 2 U.S.C. §439.

Although the Commission may initiate an audit or legal enforcement action concerning this matter, your prompt response and a letter of explanation will be taken into consideration.

If you have any questions regarding this matter, please contact Joseph Rawson on our toll-free number (800) 424-9530. Our local number is (202) 376-2480.

Sincerely,

A handwritten signature in cursive script, appearing to read "John D. Gibson".
John D. Gibson
Assistant Staff Director
Reports Analysis Division

89040761337
9700450071

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

Attachment 4 (1 of 5)

(Summary Page)

1 Name of Committee (in Full) Salute America Political Action Committee Address (Number and Street) 1747 Pennsylvania Ave., N.W. City, State and ZIP Code Washington, DC 20006 ☒ Check here if address is different than previously reported 2 FEC Identification Number 00194837 3 ☐ This committee qualified as a multicandidate committee during this Reporting Period on <u>N/A</u>	4 TYPE OF REPORT (Check appropriate boxes) (a) ☐ April 15 Quarterly Report ☒ September 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 _____ ☐ Twelfth 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>July 1, 1985</u> through <u>Sept. 30, 1985</u>			
6 (a) Cash on hand January 1, 19 <u>85</u>			\$ 0
(b) Cash on Hand at Beginning of Reporting Period		\$ 2,410.82	
(c) Total Receipts (from Line 18)		\$ 0	\$ 25,495.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)		\$ 2,410.82	\$ 25,495.00
7 Total Disbursements (from Line 28)		\$ 1,500.00	\$ 24,584.18
8 Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))		\$ 910.82	\$ 910.82
9 Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)		\$ 0	
10 Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)		\$ 0	

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

Levi Rabinowitz, Treasurer
Type or Print Name of Treasurer

SIGNATURE OF TREASURER _____

Date _____

NOTE: Submission of false information or incomplete information may subject the person signing this report to the penalties of 2 U.S.C. § 4.

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

For further information, contact:

Federal Election Commission
800 E. Coast Pk. W.
Washington, D.C. 20002
Tel: 202-453-5611
LEAD 21: 7/8 20

FEC FORM 3X 3 80

89040761338

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

(Summary Page)

1 Name of Committee (In Full) Salute America Political Action Committee Address (Number and Street) 1747 Pennsylvania Ave., N.W. City and State Washington, DC 20006 ☐ Check here if address is different than previously reported 2 FEC Identification Number C00194837 3 ☐ This committee qualified as a multicandidate committee during this Reporting Period on <u>N/A</u>	4 TYPE OF REPORT (Check appropriate boxes) (a) ☐ April 15 Quarterly Report ☐ October 15 Quarterly Report ☐ July 15 Quarterly Report ☒ January 15 Annual Report ☐ July 15 Special Report (Check box and explain in Remarks) ☐ Notice of Termination ☐ 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>Oct. 1, 1985</u> through <u>December 31, 1985</u>			
6 (a) Cash on hand January 1, 19 <u>85</u>			\$ 0
(b) Cash on Hand at Beginning of Reporting Period		\$ 910.82	
(c) Total Receipts (from Line 18)		\$ 0	\$ 25,495.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)		\$ 910.82	\$ 25,495.00
7 Total Disbursements (from Line 28)		\$ 0	\$ 24,564.18
8 Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))		\$ 910.82	\$ 910.82
9 Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)		\$ 0	
10 Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)		\$ 0	

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

Larry Rakinowitz, Treasurer
Print Name of Treasurer

SIGNATURE OF TREASURER

Date

For further information consult:

Federal Election Commission
500 E. Street, N.W.
Washington, DC 20463
1 of Free EEO-474 (5-7)
Lined 202 376-1121

The submission of false information or incomplete information may subject the person signing this report to the penalties of 2 U.S.C. § 437c.

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

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FEC FORM 3X (3/80)

REPORT OF RECEIPTS AND DISBURSEMENTS

For a Political Committee Other Than an Authorized Committee

(Summary Page)

1 Name of Committee (in Full) Salute America Political Action Committee Address (Number and Street) 1747 Pennsylvania Ave., N.W. City, State and Zip Washington, DC 20006 ☐ Check here if address is different than previously reported	4. TYPE OF REPORT (Check one box) (a) ☒ April 15 Quarterly Report ☐ October 15 Quarterly Report ☐ July 15 Quarterly Report ☐ January 15 Quarterly Report ☐ July 15 Statement of Receipts and Disbursements ☐ Monthly Financial Report ☐ Termination Report (b) Is this Report an Amendment? ☐ YES ☒ NO
2 FEC Identification Number C00194837	3. ☐ This committee qualified as a multicandidate committee during this Reporting Period on <u>N/A</u>

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period	1/1/86 through 3/31/86		
6 (a) Cash on hand January 1, 1986			\$ 910.82
(b) Cash on Hand at Beginning of Reporting Period		\$ 910.82	
(c) Total Receipts (from Line 18)		\$ 0	\$ 0
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)		\$ 910.82	\$ 910.82
7 Total Disbursements (from Line 28)		\$ 800.00	\$ 800.00
8 Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))		\$ 110.82	\$ 110.82
9 Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)		\$ 0	
10 Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)		\$ 0	

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

Levi Rabinowitz, Treasurer
 Title: Treasurer

SIGNATURE OF TREASURER

Date

For further information contact:

Federal Election Commission
 500 E. South W
 Washington, DC 20543
 Toll Free 870-424-6532
 Local 202-376-3120

NOTE: Commission of false information 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.

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FEC FORM 3X (3/80)

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

(Summary Page)

Name of Committee (In Full) Salute America Political Action Committee Address (Number and Street) 1747 Pennsylvania Ave., N.W. Washington, DC 20006 ☐ Check here if address is different than previously reported	4 TYPE OF REPORT (Check appropriate boxes) (a) ☐ April 15 Quarterly Report ☒ October 15 Quarterly Report ☐ July 15 Quarterly Report ☐ January 15 Quarterly Report ☐ July 15 Quarterly Report ☐ January 15 Quarterly Report ☐ Monthly Report ☐ Termination Report (b) Is this Report an Amendment? ☐ YES ☒ NO
3 ☐ This committee qualified as a multicandidate committee during this Reporting Period on <u>N/A</u>	
2 F.E.C. Identification Number c00194837	

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year to Date
5 Covering Period <u>7/1/86</u> through <u>9/30/86</u>			
6 (a) Cash on hand January 1, 19 <u>86</u>			\$ 910.92
(b) Cash on Hand at Beginning of Reporting Period	\$ 110.82		
(c) Total Receipts (from Line 18)	\$ 0	\$ 0	
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 110.82	\$ 910.92	
7 Total Disbursements (from Line 28)	\$ 0	\$ 800.00	
8 Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 110.82	\$ 110.82	
9 Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)	\$ 0		
10 Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	\$ 0		

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

Levi Rabinowitz, Treasurer

 Date _____

SIGNATURE OF TREASURER

Date

For further information contact:

Federal Election Commission
 801 E. Street, N.W.
 Washington, D.C. 20541
 Tel. for 800-424-9633
 Local 202-376-3700

This report is made in accordance with the complete instructions may subject the person signing this report to the penalties of 2 U.S.C. § 437g.

All previous editions of FEC FORM 3 and FEC FORM 2a are obsolete and should no longer be used.

FEC FORM 3X (3-80)

99040761342

RECEIVED AT THE ETC

87 MAR 9 48:31



March 5, 1987

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

Re: Salute America Political Action Committee
Quarterly Reports

Dear Sirs:

Please find enclosed for filing the following quarterly reports for the Salute America Political Action Committee:

1. July 1, 1985 - September 30, 1985;
2. October 1, 1985 - December 31, 1985;
3. January 1, 1986 - March 31, 1986;
4. April 1, 1986 - June 30, 1986; and
5. July 1, 1986 - September 30, 1986.

The report for the last quarter of 1986 presently is being prepared and will be filed shortly.

Sincerely,

Levi Rabinowitz
Treasurer, Salute America
Political Action Committee

LR:dla
Enclosures

890407013342

1987 April 10 11 AM
FEB 11 1987
MAR 11 1987
APR 11 1987
MAY 11 1987
JUN 11 1987
JUL 11 1987
AUG 11 1987
SEP 11 1987
OCT 11 1987
NOV 11 1987
DEC 11 1987



March 17, 1987

Mr. John D. Gibson
Assistant Staff Director
Reports Analysis Division
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: Salute America PAC
FEC No. C00194837

Dear Mr. Gibson:

I am in receipt of your letter of January 23, 1987 concerning the quarterly reports of Salute America PAC. Because Salute America PAC has changed addresses, I did not receive your letter until just recently. Salute America PAC's new address is 1747 Pennsylvania Avenue, N.W., Washington D.C. 20006 and this has been noted on the most recent filings with the Commission.

Your letter notes that several quarterly reports of Salute America PAC had not been filed with the Commission. By letter dated March 5, 1987, I submitted to the FEC the quarterly reports for the last two quarters of 1985 and the quarterly reports for the first three quarters of 1986. I further indicated that the report for the last quarter of 1986 was being prepared and would be filed as soon as possible.

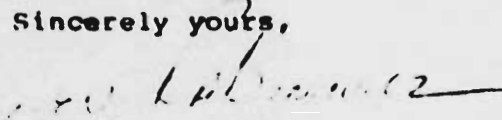
As you can see from the reports that were filed with my letter of March 5, 1987, Salute America PAC was essentially inactive from July 1, 1985 to September 30, 1986. During that time period the then-Treasurer resigned and in November, 1985, I was appointed the new Treasurer. I did not receive the books and records of Salute America PAC until some time later. Because Salute America PAC was essentially inactive up to September 30, 1986 and due to inadvertence, the quarterly reports were not filed with the FEC. As indicated by my letter of March 5, 1987,

Mr. John D. Gibson
March 17, 1987
Page Two

I have attempted to rectify this by having all of the outstanding reports prepared and filed with the FEC and all reports through September 30, 1986 have been filed. The reports for the periods subsequent to that date presently are being prepared and I hope to file them in the near future.

Now that Salute America PAC has been "reactivated," I will do my best to insure that all future reports are filed in a timely fashion.

Sincerely yours,


Levi Rabinowitz
Treasurer, Salute America
Political Action Committee

LR:dla



8 2 7 4 0 7 3 6 1 3 9 4 5



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20461

BQ-7

JUN 9 1987

Levi Rabinowits, Treasurer
Salute America Political
Action Committee
1747 Pennsylvania Avenue, N.W.
Suite 1000
Washington, DC 20006

Identification Number: C00194837

Reference: Year End Report (11/25/86-12/31/86)

Dear Mr. Rabinowits:

It has come to the attention of the Federal Election Commission ("the Commission") that your committee may be in violation of 2 U.S.C. §434(a) for failing to file the above referenced Report of Receipts and Disbursements. You were notified previously of the due date for this report.

It is important that you file this report immediately with the Federal Election Commission, 999 E Street, NW, Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of the report or the relevant portions should also be filed with the Secretary of State or equivalent State officer. See 2 U.S.C. §439.

Although the Commission may initiate an audit or legal enforcement action concerning this matter, your prompt response and a letter of explanation will be taken into consideration.

If you have any questions, please contact Brian J. Hancock on our toll-free number (800) 424-9330. Our local number is (202) 376-2460.

Sincerely,

A handwritten signature in dark ink, appearing to read "John D. Gibson".

John D. Gibson
Assistant Staff Director
Reports Analysis Division

89040761340
0701601617

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

RECEIVED AT THE FEC
Attachment 8 (1 of 4)
87 MAY 26 09:24

(Summary Page)

ALG 04/18/87

ALG 04/18/87

Name of Committee (in full)
Salute America Political Action Committee

Address (Number and Street)
*1747 Pennsylvania Ave, NW
Suite 1800*

City, State and ZIP Code
Washington, DC 20006

☐ Check here if address is different than previously reported

2 FEC Identification Number
C00194837

3 ☐ This committee qualified as a multi-candidate committee during this Reporting Period on *N/A* (Date)

4 TYPE OF REPORT (Check appropriate boxes)

- (a) ☒ April 15 Quarterly Report ☐ October 15 Quarterly Report
☐ July 15 Quarterly Report ☐ January 31 Year End Report
☐ July 31 Mid Year Report (Non Election Year Only)
☐ Monthly Report for _____
☐ Twelfth day report preceding _____ (Type of Election)
election on _____ in the State of _____
☐ Thirtieth day report following the General Election
on _____ in the State of _____
☐ Termination Report

(b) Is this Report an Amendment?

☐ YES ☒ NO

SUMMARY

5 Covering Period *1/1/87* through *3/31/87*

6 (a) Cash on hand January 1, 19 *87*

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 18)

(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)

7 Total Disbursements (from Line 28)

8 Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))

9 Debts and Obligations Owed TO The Committee

(from Schedule C or Schedule D)

10 Debts and Obligations Owed BY the Committee

(from Schedule C or Schedule D)

11 I have examined this Report and the supporting schedules and believe the information is true and correct.

Levi Rabinowitz
Treasurer

SIGNATURE OF TREASURER

Edw. J. W. [Signature] *5/21/87*
Date

COLUMN A
This Period

COLUMN B
Calendar Year-to-Date

\$ *2777.90*

\$ *2777.90* **RD**

\$ *10,500.00* \$ *10,500.00*

\$ *13,277.90* \$ *13,277.90*

\$ *12,869.94* \$ *12,869.94*

\$ *467.96* \$ *467.96*

\$ *70,500.00* **RD**

For further information contact:

Federal Election Commission

Toll-free 1-800-424-9300

Local 202-434-1341

89040764347
3700460241347

SCHEDULE C
(Revised 3/80)

LOANS

Attachment 8 (2 of 4)

LINE NUMBER 1 for
(Use separate schedules
for each numbered line)

Name of Committee (in Full)			
Liberty Democratic Political Action Committee			
A. Full Name, Mailing Address and ZIP Code of Loan Source		Original Amount of Loan	Cumulative Payment To Date
Morris Talansky 1326 Sage Rd. Far Rockaway, NY 11691		5,500	-
Election ☐ Primary ☐ General ☐ Other (specify)			Balance Outstanding at Close of This Period
			5,500
Terms: Date Incurred _____ Date Due _____ Interest Rate _____ % (april) ☐ Secured			
List All Endorsers or Guarantors (if any) to Item A			
1. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding \$	
2. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding \$	
3. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding \$	
B. Full Name, Mailing Address and ZIP Code of Loan Source		Original Amount of Loan	Cumulative Payment To Date
Miriam Talansky 1326 Sage Rd. Far Rockaway, NY 11691		5,000	-
Election ☐ Primary ☐ General ☐ Other (specify)			Balance Outstanding at Close of This Period
			5,000
Terms: Date Incurred _____ Date Due _____ Interest Rate _____ % (april) ☐ Secured			
List All Endorsers or Guarantors (if any) to Item B			
1. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding \$	
2. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding \$	
3. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding \$	
SUBTOTALS This Period This Page (attach)			
TOTALS This Period (see page in this line only)			10,500

87001602917

SCHEDULE D
(Revised 3/80)

DEBTS AND OBLIGATIONS
Excluding Loans

LINE NUMBER _____ for
Use separate schedules
for each numbered line)

Name of Committee (in Full)	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
<i>Salute America PAC</i>				
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor <i>Sidney Olson 5700 Collins Ave., Apt. 14L Miami Beach, FL 33140</i>	<i>5000.00</i>			<i>5000.00</i>
Nature of Debt (Purpose):				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor <i>Miriam Olson 5700 Collins Ave., Apt. 14L Miami Beach, FL 33140</i>	<i>5000.00</i>			<i>5000.00</i>
Nature of Debt (Purpose):				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor <i>Sande Quinn 31 Gateway Dr. Great Neck, NY 11021</i>	<i>5000.00</i>			<i>5000.00</i>
Nature of Debt (Purpose):				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor <i>Saul Quinn 31 Gateway Dr. Great Neck, NY 11021</i>	<i>5000.00</i>			<i>5000.00</i>
Nature of Debt (Purpose):				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor <i>Els Bendheim 4680 Livingston Ave. Riversdale, NY 10471</i>	<i>5000.00</i>			<i>5000.00</i>
Nature of Debt (Purpose):				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor <i>Charles Bendheim 4680 Livingston Ave. Riversdale, NY 10471</i>	<i>5000.00</i>			<i>5000.00</i>
Nature of Debt (Purpose):				
1) SUBTOTALS This Period This Page (optional)				<i>30,000.00</i>
2) TOTAL This Period (last page this line only)				
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)				
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)				

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DEBTS AND OBLIGATIONS
Excluding Loans

Attachment 8 (4 of 4)

NUMBER
(Use separate schedules
for each numbered line)

Name of Committee (in Full)	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
Salute America PAC				
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor <i>Handie Horowitz</i> <i>617 West End Ave.</i> <i>New York, NY 10024</i>	<i>5000.00</i>			<i>5000.00</i>
Nature of Debt (Purpose):				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor <i>Walter Horowitz</i> <i>617 West End Ave.</i> <i>New York, NY 10024</i>	<i>5000.00</i>			<i>5000.00</i>
Nature of Debt (Purpose):				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor <i>Anita Berety</i> <i>280 Park Ave.</i> <i>New York, NY 10017</i>	<i>5000.00</i>			<i>5000.00</i>
Nature of Debt (Purpose):				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor <i>Hal Berety</i> <i>280 Park Ave.</i> <i>New York, NY 10017</i>	<i>5000.00</i>			<i>5000.00</i>
Nature of Debt (Purpose):				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor <i>Circa Jesselson</i> <i>4485 Gildston Rd.</i> <i>Riverdale, NY 10471</i>	<i>5000.00</i>			<i>5000.00</i>
Nature of Debt (Purpose):				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor <i>Ludwig Jesselson</i> <i>4485 Gildston Rd.</i> <i>Riverdale, NY 10471</i>	<i>5000.00</i>			<i>5000.00</i>
Nature of Debt (Purpose):				
1) SUBTOTALS This Period This Page (optional)				<i>30,000.00</i>
2) TOTAL This Period (last page this line only)				<i>60,000.00</i>
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)				<i>10,500.00</i>
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)				<i>70,500.00</i>

3700602400



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RG-2

MAY 24 1987

Levi Rabinowitz, Treasurer
Salute America Political
Action Committee
1747 Pennsylvania Avenue, N.W.
Washington, DC 20006

Identification Number: C00194837

Reference: April Quarterly Report (1/1/87-3/31/87)

Dear Mr. Rabinowitz:

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:

-Your report discloses limited payments for administrative expenses. Administrative expenses are payments made for the purpose of operating a political committee including, but not limited to, rent, utilities, salaries, telephone service, office equipment and supplies. Any such payments to a person aggregating in excess of \$200 in a calendar year must be disclosed on Schedule B, supporting Line 19 of the Detailed Summary Page. (2 U.S.C. §434(b)(5)) In addition, if expenses have been incurred but not paid in a reporting period, the activity should be disclosed as a debt on Schedule D, if the obligation is \$500 or more, or outstanding for sixty (60) days or more. 11 CFR 104.11.

If these expenses are being paid by a connected organization, your Statement of Organization must be amended to reflect this relationship. 2 U.S.C. §433(b)(2).

Any goods or services provided to your committee by a person, except volunteer activity (i.e., a person's time), would be considered an in-kind contribution from that person, and would be subject to the disclosure requirements of 2 U.S.C. §434(b)(3) and 11 CFR 104.13, and the limitations and prohibitions of 2 U.S.C. §§441a and 441b.

Please provide clarification regarding administrative expenses incurred by your committee and/or amend your report to disclose such expenses according to the referenced provisions of the Act and Commission regulations. Clarification regarding administrative

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expenses should be disclosed during each two year election cycle beginning with the first report filed in the non-election year.

-The loan schedule (Schedule C) should disclose the following information: the name and mailing address of the person making or receiving the loan; original amount; cumulative payment; outstanding balance; date incurred; date due; and interest rate for all loans that your committee has received. Please amend Schedule C by providing the date incurred, due date, and interest rate. 11 CFR 104.3(d) and 104.11(a).

-Please provide a Schedule A to support the entry reported on Line 13 of the Detailed Summary Page. All loans and loan repayments received by your committee must be itemized on Schedule A, regardless of the amount loaned or repaid. 2 U.S.C. §434(b)(3)(E).

-Schedule D of your report has failed to include certain information. Commission Regulations require the full name and mailing address of each creditor; the outstanding balance at the beginning and end of the reporting period; the amount incurred during the period; the payment made during the period; and the nature or purpose of each debt. Additionally, all debts must be reported continuously until extinguished or settled. Please amend your report by providing the nature of all debts. 11 CFR 104.11.

-The beginning cash balance of this report is different than the ending cash balance of your last filed 1986 report. Please file your 1986 Post-General and Year End Reports. The beginning cash balance of the 1987 April Quarterly Report should equal the ending cash balance of the 1986 Year End Report.

RD

-Schedule C of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. The Act precludes a committee from receiving contributions from another political committee or a person in excess of \$5,000 per calendar year. (2 U.S.C. §441a(f)) If you have received a contribution that exceeds the limits, the Commission recommends that you refund the amount in excess of \$5,000 to the donor 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 of your intent and provide the contributor with the option of receiving a refund. Please inform the Commission immediately in writing and provide a photocopy of your check for the refund or transfer-out. In addition, the

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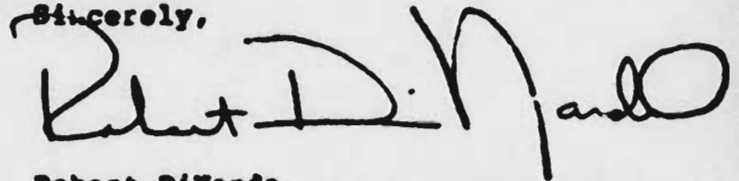
disbursement of the amount in excess should be disclosed on a supporting Schedule B for Line 26 or 27 of your next report.

If the contribution(s) in question was incorrectly reported and/or you have additional information, you may wish to submit documentation for the public record.

Although the Commission may take further legal steps concerning the acceptance of an excessive contribution(s), your prompt refund or transfer-out of the excessive amount will be taken into consideration.

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) 376-2403.

Sincerely,



Robert DiNardo
Reports Analyst
Reports Analysis Division

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FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

AQ-3

December 17, 1987

Levi Rabinowits, Treasurer
Salute America Political Action
Committee
1747 Pennsylvania Avenue, NW
Washington, DC 20006

Identification Number: C00194837

Reference: April Quarterly (1/1/87-3/31/87) and July Quarterly
(4/1/87-6/30/87) Reports

Dear Mr. Rabinowits:

This letter is to inform you that as of December 16, 1987, the Commission has not received your response to our requests for additional information dated November 24, 1987. Those notices 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). Copies of our original requests are 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 Robert DiNardo on our toll-free number (800) 424-9530 or our local number (202) 376-2480.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosures

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MEMORANDUM TO THE FILES:

COMMITTEE: Salute America Political Action Committee
I.D. NUMBER: C00194837
CONTACT: Levi Rabinowitz (Treasurer)
DATE: January 20, 1988
ANALYST: Robert B. DiNardo
SUBJECT: RFAI for the Q1 and Q2 Reports

I called Mr. Levi Rabinowitz at 4:20 in regards to the RFAI for the Q1 and Q2 reports. Mr. Rabinowitz was not available so I left a message for him to call me back.

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MEMORANDUM TO THE FILES:

COMMITTEE: Salute America Political Action Committee
I.D. NUMBER: C00194837
CONTACT: Levi Rabinowitz (Treasurer)
DATE: January 21, 1988
ANALYST: Robert B. DiNardo
SUBJECT: RFAI for the Q1 and Q2 Reports

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Mr. Rabinowitz called me at 9:20. He said he was trying to get the bookkeeper who originally prepared the reports to respond to the RFAI. Mr. Rabinowitz said he wanted to terminate the Political Action Committee but noticed that the outstanding loans presented a problem. He also said that the Political Action Committee had no money to pay the bookkeeper. Consequently the bookkeeper wanted to get paid to respond to the RFAI. Mr. Rabinowitz asked me if he could have until next week to contact the bookkeeper. I told Mr. Rabinowitz that the FEC needed a response within the week or else this matter would be referred to the Office of General Counsel. Mr. Rabinowitz said he would try to respond within the week.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Friends of Vin Weber and Robert)
A. Kovell, as treasurer)
Salute America Political Action)
Committee and Levi Rabinowitz,)
as treasurer)

MUR 2526
and
RAD 87L-03

GENERAL COUNSEL'S REPORT

I. BACKGROUND

The Office of the General Counsel received a complaint on August 6, 1987, from Robert Bauer, Esquire, on behalf of the Democratic Congressional Campaign Committee. Named as respondents were the Friends of Vin Weber, an authorized committee, and Salute America Political Action Committee, an unauthorized committee. Both respondents were notified of the complaint.

The Friends of Vin Weber filed its response on September 2, 1987. After requesting and receiving two extensions of time, Salute America PAC filed its response on November 3, 1987. 1/

On February 24, 1988, Salute America was referred to the Office of the General Counsel by the Reports Analysis Division ("RAD"). The basis of the attached referral is Salute America's failure to timely file its 1985 Year End Report as well as its 1986 April, July and October Quarterly Reports. Additionally, Salute America has yet to file its 1986 Post-General and Year End Reports.

1/ On October 20, 1987, the Commission approved a second extension of time until October 31, 1987.

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SENSITIVE
EXECUTIVE SESSION
APR 05 1988

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The complaint in this matter alleges that Congressman Weber established Salute America PAC "as a conduit for contributions in support of his own personal re-election campaigns to the Congress." The complaint further alleges that, "[a]s such, Salute America PAC functioned not as a bona-fide 'multicandidate committee' as stated to the Commission, but rather as a committee affiliated with Weber's principal campaign committee." Complaint at 1. 2/ Additionally, the complaint notes a number of reporting problems. This report first discusses the reporting irregularities of Salute America PAC and then discusses the alleged affiliation of Salute America PAC with the Friends of Vin Weber.

II. REPORTING IRREGULARITIES

Salute America PAC filed a Statement of Organization in March, 1985, and filed its first report, a Mid-Year Report, in June, 1985. This report indicated the Committee had received \$24,495 in contributions and had expended \$23,094. Salute America reported all its disbursements as operating expenditures. The Committee filed no further reports until March, 1987. At that time, in response to a succession of Failure to File Notices for all reports (except the 1986 Year End) mailed to Salute America on January 23, 1987, Salute America PAC filed its missing reports up through the period ending September 30, 1986. 3/ The

2/ Salute America PAC has stated, however, that it has not qualified as a multicandidate committee. See Response at 1. As discussed at section II, because Salute America PAC has not filed its required reports, it is unknown whether Salute America has qualified as a multicandidate committee.

3/ A non-filer notice was sent to Salute America regarding its 1986 Year End Report on June 9, 1987.

only activity contained on these reports is a \$1,500 contribution refund on the 1985 Mid-Year Report and a \$800 "debt settlement" on the 1986 April Quarterly Report. The Committee has not, however, filed its 1986 Post-General and Year End Reports. ^{4/} Thus, the Committee filed late reports during 1985 and 1986 and has yet to file 1986 Post-General and Year End Reports. (The Committee's 1987 filings have been timely.)

The Act requires political committees other than authorized committees to file on either a quarterly or monthly basis. 2 U.S.C. § 434(a)(4). Those opting to file quarterly are required to file quarterly reports in an election year. These reports must be filed on the 15th day after the last day of each calendar quarter, except that the last report for the year must be filed no later than January 31 of the following calendar year. 2 U.S.C. § 434(a)(4)(A)(i). Additionally, such a committee is required to file a pre-election report if it makes a contribution or expenditure on behalf of a candidate in such an election. 2 U.S.C. § 434(a)(4)(A)(ii). An unauthorized committee is also required to file a post general

^{4/} Salute America's 1987 April Quarterly Report indicates that the Committee owes \$60,000 in debts to 12 individuals and that these debts were incurred in a prior reporting period. These debts are individually itemized on Schedule D of the April Quarterly Report, however, the Committee has failed to file a completed Schedule D that includes information regarding amounts incurred and payments made. Additionally, Schedule C of this report notes the Committee accepted two loans totalling \$10,500 from two individuals. Schedule C is also incomplete in that the terms of these loans are not disclosed. However, there is no information on the public record regarding Salute America's receipt and disbursement of these amounts on these two schedules during the reporting periods in which it failed to file, i.e., the Post-General and Year End Reports. Moreover, although the amount of one loan is facially excessive, this Office makes no recommendations regarding Salute America's receipt of possible excessives at this time. When the missing reports are received and reviewed by this Office, we will then recommend pursuing all excessive contributions.

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election report no later than 30 days after the general election. 2 U.S.C. § 434(a)(4)(A)(iii). Finally, in a non-election year, an unauthorized committee is required to file twice yearly at six month intervals, with the first report due on July 31 and the second report due on January 31 of the following calendar year. 2 U.S.C. § 434(a)(4)(A)(iv).

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In the instant case Salute America PAC has failed to meet the Act's reporting requirements. It failed to timely file reports reflecting activity from its 1985 Year End Report until its 1986 Year End Report. Additionally, it has yet to file 1986 Post-General, and Year End Reports. (As previously noted, these reports include the Committee's receipt of at least \$70,000 in receipts). It is unknown whether Salute America should have filed a Pre-General Report. Therefore, this Office recommends that the Commission open a MUR as to RAD 87L-03, merge MUR 2526 with this former RAD Referral and find reason to believe Salute America PAC and Levi Rabinowitz, as treasurer, violated 2 U.S.C. § 434(a)(4).

III. ALLEGED AFFILIATION

Relying upon alleged conduit activity and the former association of the Friends of Vin Weber and Salute America committees, the complaint alleges that the two committees are affiliated and that such affiliation has resulted in excessive contributions in violation of 2 U.S.C. § 441a, violations of the Act's registration and reporting requirements and contributions made in the name of another.

Pursuant to 2 U.S.C. § 441a(a)(1)(A), political committees that are not multicandidate committees are limited to contributing \$1,000 per election to an authorized committee of a candidate. Committees are prohibited from accepting contributions exceeding the Act's limitations. 2 U.S.C. §441a(f). Affiliated political committees may transfer funds between themselves without limitation. 2 U.S.C. § 441a(a)(4) and 11 C.F.R. § 102.6(a)(1). The Act subjects affiliated political committees to a common contribution limitation. 2 U.S.C. § 441a(a)(5). Affiliated committees are defined as committees established, financed, maintained or controlled by the same person or group of persons. Id. Additionally, the Commission's Regulations note that indicia of affiliation include similar patterns of contributions and the transfer of funds between committees that represent a substantial portion of the funds of the transferor or the transferee committee. 11 C.F.R. § 100.5(g)(2)(ii)(D) and (E). Political committees are required to list any affiliated committees on their Statements of Organization. 2 U.S.C. § 433.

Salute America's response states that it is not a multicandidate committee. However, because it has not filed all of its reports with the Commission, it is unknown whether Salute America has qualified as a multicandidate committee. If Salute America PAC is a multicandidate committee, the question of its possible affiliation with the Friends of Vin Weber must be analyzed in light of prior Commission precedents regarding the relationship of multicandidate committees and principal campaign committees. The Commission has addressed the issue whether

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an unauthorized political committee can be affiliated with a principal campaign committee ("PCC") in a number of matters. First, in MUR 459, the Commission permitted a PCC to raise its purported affiliation with a multicandidate committee as an affirmative defense to a reason to believe finding of a violation of 2 U.S.C. § 441a(f). Later, however, in MURs 950 and 1741, based on an analysis offered by this Office, the Commission used the contribution limitations of 2 U.S.C. § 441a(a) to analyze the transactions between a PCC and a multicandidate committee which allegedly had an association with the candidate, as is presented in this matter. Thus, such committees were not viewed as able to make unlimited transfers, rather their transactions were subject to the Act's \$5,000 contribution limitation at 2 U.S.C. § 441a(a)(2)(A). This approach was also used in MUR 2161, notwithstanding the fact that respondents raised affiliation as an affirmative defense. Although the General Counsel's Reports in these latter matters pointed out that the Commission has never said a multicandidate committee which has an association with a candidate and a PCC cannot be affiliated, they stressed that the more appropriate analysis of transactions between such committees is the application of the contribution limits at 2 U.S.C. § 441a(a). ^{5/} Finally, in MUR 1870, the Commission rejected recommendations based on an analysis proffered by this Office that, based upon the interchange of key personnel and similar patterns of contributions, a PCC and a multicandidate committee were affiliated.

^{5/} In the context of the revision of the affiliation regulations, the Commission is currently examining the possibility of making a distinction between so-called leadership PACs and other unauthorized committees associated with candidates for federal offices. To date, no final determination has been reached regarding whether such a distinction will be made or what the basis will be for this distinction.

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The Commission has applied a different analysis, based on a recommendation of the Office of the General Counsel, where a principal campaign committee and a non-multicandidate committee have appeared to meet the indicia of affiliation. For example, in MUR 2083 (Bob Richards), the Commission considered two committees that had been commonly established to be affiliated, notwithstanding their apparent estrangement at a later point in time. The primary issues in such matters are whether the committees initially appeared to be affiliated, and, if so, whether they can become subsequently disaffiliated.

In the instant case, because Salute America has not filed all its reports, it is unknown whether Salute America has qualified as a multicandidate committee. Additionally, although the committees apparently previously considered themselves to be affiliated, both respondents deny this to now be the case. 6/ The candidate Vin Weber filed a statement with the Commission stating that he had "not been officially affiliated with [Salute America] since May, 1985," and requested that his name be "removed from the informal list of candidate PAC's." Friends of Vin Weber Response at 5.

6/ The responses are inconsistent regarding the initial relationship of the committees. Friends of Vin Weber states that the candidate has not been affiliated with Salute America since 1985; Salute America denies any initial affiliation. This discrepancy may be explained by the fact that the current treasurer re-activated the PAC and apparently is unaware of its prior relationship with the candidate.

At this juncture, given the fact that by the candidate's own admission the committees previously considered themselves to be affiliated, and in the absence of any evidence that Salute America has attained multicandidate committee status, this Office believes the two committees may be affiliated, but have not acknowledged this fact on their respective Statements of Organization. 7/ Accordingly, this Office recommends that the Commission find reason to believe Salute America PAC and Levi Rabinowitz, as treasurer, and the Friends of Vin Weber and Robert A. Kovell, as treasurer, violated 2 U.S.C. § 433.

RECOMMENDATIONS

1. Open a MUR.
2. Merge MUR 2526 with former RAD 87L-03.
3. Find reason to believe Salute America PAC and Levi Rabinowitz, as treasurer, violated 2 U.S.C. §§ 434(a)(4) and 433.
4. Find reason to believe the Friends of Vin Weber and Robert A. Kovell, as treasurer, violated 2 U.S.C. § 433.

7/ As previously noted, the complaint alleges that Salute America was established to act as a conduit for contributions to the Friends of Vin Weber and therefore, the two committees are affiliated. The complaint bases the entire allegation on an apparent assumption that if a committee acts as a conduit for contributions to a second committee, the two committees automatically become affiliated. Because Salute America has not filed its reports for the end of 1986, there is insufficient information available at this time for this Office to review for possible conduit activity.

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5. Approve the attached subpoenas, letters, and factual and legal analysis.

Lawrence M. Noble
General Counsel

By: 
Lois G. Lerner
Associate General Counsel

3/28/88
Date

Attachments

1. Friends of Vin Weber Response
2. Salute America Response
3. Proposed Letters
4. Subpoenas and Order
5. RAD Referral
6. Factual and Legal Analysis

Staff Person: Patty Reilly

89040761365



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

MEMORANDUM TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

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

DATE: MARCH 31, 1988

SUBJECT: OBJECTION TO MUR 2526 & RAD Ref. 87L-03: GENERAL
COUNSEL'S REPORT SIGNED MARCH 28, 1988.

The above-captioned document was circulated to the
Commission on Tuesday, March 29, 1988 at 4:00 P.M.

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

Commissioner Aikens	<u>X</u>
Commissioner Elliott	<u>X</u>
Commissioner Josefiak	<u>X</u>
Commissioner McDonald	<u> </u>
Commissioner McGarry	<u> </u>
Commissioner Thomas	<u> </u>

This matter will be placed on the Executive Session
agenda for April 5, 1988.

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

89040761366

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Friends of Vin Weber and Robert)
A. Kovell, as treasurer) MUR 2526
Salute America Political Action) and
Committee and Levi Rabinowitz,) RAD 88L-03
as treasurer)

(MUR
2597)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of April 5, 1988, do hereby certify that the Commission decided by a vote of 5-0 to take the following actions in the above-captioned matter:

1. Open a Matter Under Review (MUR).
2. Merge MUR 2526 with former RAD 88L-03.
3. Find reason to believe Salute America PAC and Levi Rabinowitz, as treasurer, violated 2 U.S.C. § 434(a)(4).
4. Take no action at this time with respect to the General Counsel's recommendation to find reason to believe Salute America PAC and Levi Rabinowitz, as treasurer, violated 2 U.S.C. § 433.

(continued)

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5. Take no action at this time with respect to the General Counsel's recommendation to find reason to believe the Friends of Vin Weber and Robert A. Kovell, as treasurer, violated 2 U.S.C. § 433.
6. Direct the Office of General Counsel to send appropriate letters, factual and legal analysis, and subpoenas, based on the above-noted actions and the meeting discussion.

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

Attest:

4/7/88

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

89040761368



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 22, 1988

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Martin Mendelsohn, Esquire
Suite 1100
1700 K Street, N.W.
Washington, D.C. 20006

RE: MUR 2597
Salute America PAC and
Levi Rabinowitz, as
treasurer

Dear Mr. Mendelsohn:

On August 12, 1987, the Federal Election Commission notified Salute America PAC and Levi Rabinowitz, as treasurer, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint was enclosed with that notification.

Upon further review of the allegations contained in the complaint, information supplied by your clients, and based on information ascertained by the Commission in the normal course of carrying out its supervisory duties, the Commission on April 5, 1988, found that there is reason to believe Salute America PAC and Levi Rabinowitz, as treasurer, violated 2 U.S.C. § 434(a)(4), a provision of the Act. Specifically it appears that your clients filed the following late reports: 1985 Year End, 1986 April, July and October Quarterly Reports. Additionally, your clients have yet to file a 1986 Post-General and Year End Reports. The Factual and Legal Analysis, which formed a basis of the Commission's finding regarding late filings and failures to file, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against your clients. 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 along with your response to the enclosed subpoena.

3 9 0 4 0 7 6 1 3 6 9

Martin Mendelsohn, Esquire
Page 2

All responses to the subpoena must be submitted to the General Counsel's Office within 15 days of your receipt of this letter. Statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against your clients, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

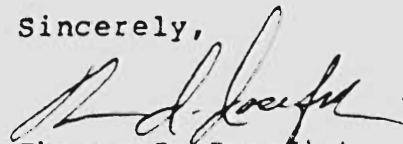
If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending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

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.

If you have any questions, please contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,


Thomas J. Josefiak
Chairman

Enclosure
Subpoena

89040761370

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

)
)
) MUR 2597
)

SUBPOENA TO PRODUCE DOCUMENTS

TO: Levi Rabinowitz
Treasurer, Salute America PAC
c/o Martin Mendelsohn, Esquire
Suite 1100
1700 K Street, N.W.
Washington, D.C. 20006

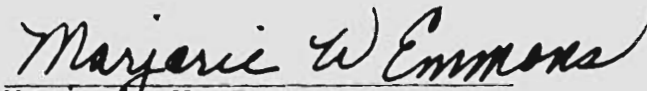
8 9 0 4 0 7 6 1 3 7 1
Pursuant to 2 U.S.C. § 437d(a)(3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby subpoenas you to produce the documents requested on the attachment to this Subpoena. Legible copies which, where applicable, show both sides of the documents, may be substituted for originals.

Such documents must be forwarded to the Office of the General Counsel within 15 days of your receipt of this Subpoena.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on this 19th day of April, 1988.


Thomas J. Josefiak Chairman
Federal Election Commission

ATTEST:


Marjorie W. Emmons
Secretary to the Commission

Attachment
Document Request

LAW OFFICES
MARTIN MENDELSON
SUITE 1100
1700 K STREET, N. W.
WASHINGTON, D. C. 20006
(202) 833-1893

300#9204
RECEIVED
FEDERAL ELECTION COMMISSION
MAY 1988

88 MAY -4 AM 10:36

May 3, 1988

2 7 3 1 9 7 0 4 0 6 8
Patty Reilly, Esquire
Office of General Counsel
Federal Election Commission
Washington, D.C. 20463

Re: MUR 2597
Salute America PAC and
Levi Rabinowitz, as Treasurer

Dear Ms. Reilly:

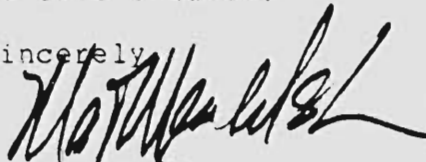
This confirms our conversation of today. I am requesting an extension until May 19, 1987 to provide you with the documents you requested.

As I explained, Mr. Rabinowitz' father suffered a stroke on April 22, 1988 and Mr. Rabinowitz has been in Tennessee since that time. We have been unable to confer about your document request. Mr. Rabinowitz was due back in Washington today but called this morning to say his father was still hospitalized and he would be staying in Tennessee for a few more days.

To compound the difficulty, I will be out of the country from May 8-14.

For these reasons we are requesting the extension until May 19. I hope you will agree to this request.

Sincerely,


Martin Mendelson

MM:jpn

RECEIVED
FEDERAL ELECTION COMMISSION
88 MAY -4 AM 11:44



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 6, 1988

Martin Mendelsohn, Esquire
Suite 1100
1700 K Street, N.W.
Washington, D.C. 20006

RE: MUR 2597
Salute America PAC and Levi
Rabinowitz, as treasurer

Dear Mr. Mendelsohn:

The Office of the General Counsel is in receipt of your recent letter requesting a nine day extension of time to respond to the Commission's document request in the above-captioned matter. After considering the circumstances as detailed in your letter, this Office will grant the requested extension. Accordingly, your response is due no later than May 19, 1988.

If you have any questions please contact Patty Reilly, the attorney assigned to this matter, at 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

Lois G. Lerner
BY: Lois G. Lerner
Associate General Counsel

BEFORE THE FEDERAL ELECTION COMMISSION

88 MAY -9 PM 3:19

In the Matter of)
)
Salute America PAC and Levi) MUR 2597
Rabinowitz, as treasurer)

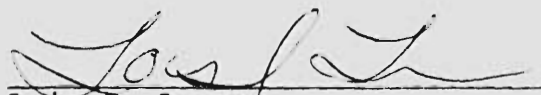
COMPREHENSIVE INVESTIGATIVE REPORT #1

On April 5, 1988, the Commission found reason to believe Salute America PAC and Levi Rabinowitz, as treasurer ("the Committee"), violated 2 U.S.C. § 434(a)(4) by failing to file and failure to timely file a number of reports.^{*/} Respondents were notified of this determination by a letter dated April 15, 1988.

Subsequently, respondent's counsel contacted this Office and requested an extension of time until May 9, 1988, due to the hospitalization of the treasurer's father. Under this circumstance, this Office granted the requested extension. At the conclusion of this period, this Office will report to the Commission.

Lawrence M. Noble
General Counsel

5/9/88
Date

BY: 
Lois G. Lerner
Associate General Counsel

^{*/} This matter was formally captioned MUR 2526 and RAD 88L-30.

Staff assigned: Patty Reilly

89040701374

LAW OFFICES
MARTIN MENDELSON
SUITE 1100
1700 K STREET, N. W.
WASHINGTON, D. C. 20006
(202) 833-1893

60049356
RECEIVED
FEDERAL ELECTION COMMISSION

88 MAY 23 PM 1:56

May 19, 1988

Patty Reilly, Esquire
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 2597
Salute America, PAC and
Levi Rabinowitz, as Treasurer

Dear Ms. Reilly:

Pursuant to the Subpoena to Produce Documents issued in the above-referenced case, enclosed herewith is the year end report for the calendar year 1986 submitted by Mr. Rabinowitz on behalf of the Salute America PAC.

On behalf of my clients I request, pursuant to 11 C.F.R. §111.18(d), that this matter be subject to pre-probable cause conciliation.

Sincerely



Martin Mendelsohn

MM:jph
Enclosure

RECEIVED
FEDERAL ELECTION COMMISSION
88 MAY 24 AM 11:22

623196705068

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee
(Summary Page)

RECEIVED
FEDERAL ELECTION COMMISSION

88 MAY 23 PM 1:56

USE FEC MAILING LABEL
OR
TYPE OR PRINT

1. NAME OF COMMITTEE (in full) Salute America Political Action Committee		2. FEC IDENTIFICATION NUMBER C00194837
ADDRESS (number and street) ☒ Check if different than previously reported 1240 24th Street, N.W. Suite 1000		
CITY, STATE and ZIP CODE Washington, D.C. 20037		

4. TYPE OF REPORT

(a) ☐ April 15 Quarterly Report

☐ July 15 Quarterly Report

☐ October 15 Quarterly Report

☒ January 31 Year End Report

☐ July 31 Mid Year Report (Non-election Year Only)

☐ Termination Report

Monthly Report Due On:

☐ February 20	☐ June 20	☐ October 20
☐ March 20	☐ July 20	☐ November 20
☐ April 20	☐ August 20	☐ December 20
☐ May 20	☐ September 20	☐ January 31

☐ Twelfth day report preceding _____
(Type of Election)

election on _____ in the State of _____

☐ Thirtieth day report following the General Election on _____
in the State of _____

(b) Is this Report an Amendment? ☒ YES ☐ NO

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period	<u>Oct. 1, 1986</u> through <u>Dec. 31, 1986</u>		
6. (a) Cash on Hand January 1, 19			\$ 910.82
(b) Cash on Hand at Beginning of Reporting Period		\$ 110.82	
(c) Total Receipts (from Line 18)		\$ 65,100.00	\$ 65,100.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)		\$ 65,210.82	\$ 66,010.82
7. Total Disbursements (from Line 28)		\$ 62,432.92	\$ 63,232.92
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))		\$ 2,777.90	\$ 2,777.90
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)		\$	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-376-3120
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)		\$60,000.00	
I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.			
Type or Print Name of Treasurer Levi Rabinowitz			
Signature of Treasurer <i>Levi Rabinowitz</i>			Date May 18, 1988

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

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

FEC FORM 3X
(revised 4/87)

DETAILED SUMMARY PAGE

of Receipts and Disbursements
(Page 2, FEC FORM 3X)

Name of Committee (in full)	Report Covering the Period	
	From:	To:
	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date
I. RECEIPTS		
11. CONTRIBUTIONS (other than loans) FROM:		
(a) Individuals/Persons Other Than Political Committees		
(i) Itemized (use Schedule A)	- 0 -	- 0 -
(ii) Unitemized	100.00	100.00
(iii) Total of contributions from individuals	100.00	100.00
(b) Political Party Committees	- 0 -	
(c) Other Political Committees (such as PACs)	- 0 -	
(d) TOTAL CONTRIBUTIONS (add 11(a)(iii), (b), and (c))	100.00	100.00
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES	100.00	100.00
13. ALL LOANS RECEIVED	60,000.00	60,000.00
14. LOAN REPAYMENTS RECEIVED	- 0 -	- 0 -
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	- 0 -	- 0 -
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	5,000.00	5,000.00
17. OTHER RECEIPTS (Dividends, Interest, etc.)	- 0 -	- 0 -
18. TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)	65,100.00	65,100.00
II. DISBURSEMENTS		
19. OPERATING EXPENDITURES	54,932.92	55,732.92
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES	- 0 -	
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	7,500.00	7,500.00
22. INDEPENDENT EXPENDITURES (use Schedule E)	- 0 -	
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (use Schedule F)	- 0 -	
24. LOAN REPAYMENTS MADE	- 0 -	
25. LOANS MADE	- 0 -	
26. REFUNDS OF CONTRIBUTIONS TO:		
(a) Individuals/Persons Other Than Political Committees	- 0 -	
(b) Political Party Committees	- 0 -	
(c) Other Political Committees (such as PACs)	- 0 -	
(d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c))		
27. OTHER DISBURSEMENTS	- 0 -	
28. TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	62,432.92	63,232.92
III. NET CONTRIBUTIONS/OPERATING EXPENDITURES		
29. TOTAL CONTRIBUTIONS (other than loans) (from Line 11(d))	100.00	100.00
30. TOTAL CONTRIBUTION REFUNDS (from Line 26(d))	- 0 -	- 0 -
31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from 29)	100.00	100.00
32. TOTAL OPERATING EXPENDITURES (from Line 19)	54,932.92	55,732.92
33. OFFSETS TO OPERATING EXPENDITURES (from Line 15)	- 0 -	- 0 -
34. NET OPERATING EXPENDITURES (subtract Line 33 from 32)	54,932.92	55,732.92

89040761377

SCHEDULE A

INCOME RECEIPTS

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

PAGE 1 OF 1
FOR LINE NUMBER 16

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)

Salute America Political Action Committee

A. Full Name, Mailing Address and ZIP Code Friends of Vin Webber P.O. Box 1690 Wilmar, MN 56201	Name of Employer Return of Contribution	Date (month, day, year) 12/5/86	Amount of Each Receipt this Period 5,000.00
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation		
	Aggregate Year-to-Date > \$		
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation		
	Aggregate Year-to-Date > \$		
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation		
	Aggregate Year-to-Date > \$		
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation		
	Aggregate Year-to-Date > \$		
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation		
	Aggregate Year-to-Date > \$		
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation		
	Aggregate Year-to-Date > \$		
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation		
	Aggregate Year-to-Date > \$		

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only)

5,000.00

89040701378

SCHEDULE B

ITEM DISBURSEMENTS

 Separate schedule(s)
category of the
Detailed Summary Page

 PAGE 1 OF 2
FOR LINE NUMBER 19

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)

Salute America Political Action Committee

A. Full Name, Mailing Address and ZIP Code Levi Rabinowitz 1747 Penn. Ave., N.W. Washington, D.C. 20006	Purpose of Disbursement Mgmt. Fee & Exp. Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 10/2/86	Amount of Each Disbursement This Period 12,800.00
B. Full Name, Mailing Address and ZIP Code Hugh Branson 1025 Conn. Avenue, N.W. Washington, D.C. 20036	Purpose of Disbursement Consulting Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 11/4/86	Amount of Each Disbursement This Period 2,500.00
C. Full Name, Mailing Address and ZIP Code Gayle Monkkonen 1848 Ontario Place, N.W. Washington, D.C. 20009	Purpose of Disbursement Stationery & Printing Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 11/10/86	Amount of Each Disbursement This Period 2,491.78
D. Full Name, Mailing Address and ZIP Code Levi Rabinowitz 1747 Penn. Avenue, N.W. Washington, D.C. 20006	Purpose of Disbursement Mgmt. Fee & Exp. Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 11/6/86	Amount of Each Disbursement This Period 11,741.86
E. Full Name, Mailing Address and ZIP Code Levi Rabinowitz 1747 Penn. Avenue, N.W. Washington, D.C. 10006	Purpose of Disbursement Mgmt. Fee & Exp. Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 11/20/86	Amount of Each Disbursement This Period 7,500.00
F. Full Name, Mailing Address and ZIP Code Gayle Monkkonen 1848 Ontario Place, N.W. Washington, D.C. 20009	Purpose of Disbursement Stationery & Printing Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 12/7/86	Amount of Each Disbursement This Period 1,761.73
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)

38,795.37

TOTAL This Period (last page this line number only)

SCHEDULE B

ITEM DISBURSEMENTS

 Separate schedule(s)
in category of the
Detailed Summary Page

 PAGE 2 OF 2
FOR LINE NUMBER 19

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)

Salute America Political Action Committee

A. Full Name, Mailing Address and ZIP Code Levi Rabinowitz 1747 Penn. Avenue, N.W. Washington, D.C. 20006	Purpose of Disbursement Mgmt. Fee & Exp. Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 12/7/86	Amount of Each Disbursement This Period 5,000.00
B. Full Name, Mailing Address and ZIP Code Levi Rabinowitz 1747 Penn. Avenue, N.W. Washington, D.C. 20006	Purpose of Disbursement Mgmt. Fee & Exp. Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 12/18/86	Amount of Each Disbursement This Period 2,000.00
C. Full Name, Mailing Address and ZIP Code Leiv Rabinowitz 1747 Penn. Avenue, N.W. Washington, D.C. 20006	Purpose of Disbursement Mgmt. Fee & Exp. Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 12/29/86	Amount of Each Disbursement This Period 9,000.00
D. Full Name, Mailing Address and ZIP Code Barbara Dodull 1747 Penn. Avenue, N.W. Washington, D.C. 20005	Purpose of Disbursement Secretarial Services Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 12/29/86	Amount of Each Disbursement This Period 80.00
E. Full Name, Mailing Address and ZIP Code First American Bank 740 15th Street, N.W. Washington, D.C. 20005	Purpose of Disbursement Check Printing Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 11/24/86	Amount of Each Disbursement This Period 57.55
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)

16,137.55

TOTAL This Period (last page this line number only)

54,932.92

80040761380

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)

Salute America Political Action Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Contribution	Date (month, day, year)	Amount of Each Disbursement This Period
Friends of Sen. D'Amato P.O. Box 888 Mineola, NY 11501	Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	10/2/86	2,500.00
B. Full Name, Mailing Address and ZIP Code Friends of Vin Webber P.O. Box 1690 Wilman, MN 56201	Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	10/2/86	(5,000.00)
C. Full Name, Mailing Address and ZIP Code Fund for America Renewal 4999 South Capital Street Washington, D.C. 20032	Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	10/8/86	5,000.00
D. Full Name, Mailing Address and ZIP Code	Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	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)

7,500.00

89040761381

Name of Committee (in Full)

Salute America Political Action Committee

A. Full Name, Mailing Address and ZIP Code of Loan Source
Sidney Olson
5700 Collins Avenue, Apt. 14L
Miami Beach, FL 33140

Original Amount
of Loan

5,000.00

Cumulative Payment
To Date

-

Balance Outstanding at
Close of This Period

5,000.00

Election: ☐ Primary ☐ General ☐ Other (specify):

Terms: Date Incurred _____ Date Due _____ Interest Rate _____ %(apr) ☐ Secured

List All Endorsers or Guarantors (if any) to Item A

1. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding:
\$

2. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding:
\$

3. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding:
\$

B. Full Name, Mailing Address and ZIP Code of Loan Source
Miriam Olson
5700 Collins Avenue, Apt. 14L
Miami Beach, FL 33140

Original Amount
of Loan

5,000.00

Cumulative Payment
To Date

-

Balance Outstanding at
Close of This Period

5,000.00

Election: ☐ Primary ☐ General ☐ Other (specify):

Terms: Date Incurred _____ Date Due _____ Interest Rate _____ %(apr) ☐ Secured

List All Endorsers or Guarantors (if any) to Item B

1. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding:
\$

2. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding:
\$

3. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding:
\$

SUBTOTALS This Period This Page (optional)

TOTALS This Period (last page in this line only)

Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.

39040761382

Name of Committee (in Full)

Salute America Political Action Committee

A. Full Name, Mailing Address and ZIP Code of Loan Source
Sandi Quinn
31 Gateway Drive
Great Nech, NY 11021

Original Amount
of Loan
5,000.00

Cumulative Payment
To Date
-

Balance Outstanding at
Close of This Period
5,000.00

Election: ☐ Primary ☐ General ☐ Other (specify):

Terms: Date Incurred _____ Date Due _____ Interest Rate _____ %(apr) ☐ Secured

List All Endorsers or Guarantors (if any) to Item A

1. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding:
\$

2. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding:
\$

3. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding:
\$

B. Full Name, Mailing Address and ZIP Code of Loan Source

Saul Quinn
31 Gateway Drive
Great Nech, NY 11021

Original Amount
of Loan
5,000.00

Cumulative Payment
To Date
-

Balance Outstanding at
Close of This Period
5,000.00

Election: ☐ Primary ☐ General ☐ Other (specify):

Terms: Date Incurred _____ Date Due _____ Interest Rate _____ %(apr) ☐ Secured

List All Endorsers or Guarantors (if any) to Item B

1. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding:
\$

2. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding:
\$

3. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding:
\$

SUBTOTALS This Period This Page (optional)

TOTALS This Period (last page in this line only)

Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.

89040761383

Name of Committee (in Full)

Salute America Political Action Committee

A. Full Name, Mailing Address and ZIP Code of Loan Source

**Els Bendheim
4680 Livingston Avenue
Riverdale, NY 10471**

Original Amount
of Loan

5,000.00

Cumulative Payment
To Date

-

Balance Outstanding at
Close of This Period

5,000.00

Election: ☐ Primary ☐ General ☐ Other (specify):

Terms: Date Incurred _____ Date Due _____ Interest Rate _____ % (apr) ☐ Secured

List All Endorsers or Guarantors (if any) to Item A

1. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding:
\$

2. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding:
\$

3. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding:
\$

B. Full Name, Mailing Address and ZIP Code of Loan Source

**Charles Bendheim
4680 Livingston Avenue
Riverdale, NY 10471**

Original Amount
of Loan

5,000.00

Cumulative Payment
To Date

-

Balance Outstanding at
Close of This Period

5,000.00

Election: ☐ Primary ☐ General ☐ Other (specify):

Terms: Date Incurred _____ Date Due _____ Interest Rate _____ % (apr) ☐ Secured

List All Endorsers or Guarantors (if any) to Item B

1. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding:
\$

2. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding:
\$

3. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding:
\$

SUBTOTALS This Period This Page (optional)

TOTALS This Period (last page in this line only)

Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.

89040761384

Name of Committee (in Full)
Salute America Political Action Committee

A. Full Name, Mailing Address and ZIP Code of Loan Source Randie Lowenthal 617 West End Avenue New York, NY 10024	Original Amount of Loan 5,000.00	Cumulative Payment To Date -	Balance Outstanding at Close of This Period 5,000.00
---	---	---	---

Election: ☐ Primary ☐ General ☐ Other (specify):

Terms: Date Incurred _____ Date Due _____ Interest Rate _____ % (apr) ☐ Secured

List All Endorsers or Guarantors (if any) to Item A

1. Full Name, Mailing Address and ZIP Code	Name of Employer
	Occupation
	Amount Guaranteed Outstanding: \$
2. Full Name, Mailing Address and ZIP Code	Name of Employer
	Occupation
	Amount Guaranteed Outstanding: \$
3. Full Name, Mailing Address and ZIP Code	Name of Employer
	Occupation
	Amount Guaranteed Outstanding: \$

B. Full Name, Mailing Address and ZIP Code of Loan Source Walter Lowenthal 617 West End Avenue New York, NY 10024	Original Amount of Loan 5,000.00	Cumulative Payment To Date -	Balance Outstanding at Close of This Period 5,000.00
---	---	---	---

Election: ☐ Primary ☐ General ☐ Other (specify):

Terms: Date Incurred _____ Date Due _____ Interest Rate _____ % (apr) ☐ Secured

List All Endorsers or Guarantors (if any) to Item B

1. Full Name, Mailing Address and ZIP Code	Name of Employer
	Occupation
	Amount Guaranteed Outstanding: \$
2. Full Name, Mailing Address and ZIP Code	Name of Employer
	Occupation
	Amount Guaranteed Outstanding: \$
3. Full Name, Mailing Address and ZIP Code	Name of Employer
	Occupation
	Amount Guaranteed Outstanding: \$

SUBTOTALS This Period This Page (optional)

TOTALS This Period (last page in this line only)

Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.

89040761385

Name of Committee (in Full)
Salute America Political Action Committee

A. Full Name, Mailing Address and ZIP Code of Loan Source

Anita Beretz
280 Park Avenue
New York, New York 10017

Original Amount
of Loan

5,000.00

Cumulative Payment
To Date

-

Balance Outstanding at
Close of This Period

5,000.00

Election: ☐ Primary ☐ General ☐ Other (specify):

Terms: Date Incurred _____ Date Due _____ Interest Rate _____ % (apr) ☐ Secured

List All Endorsers or Guarantors (if any) to Item A

1. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding:
\$

2. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding:
\$

3. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding:
\$

B. Full Name, Mailing Address and ZIP Code of Loan Source

Hal Beretz
280 Park Avenue
New York, NY 10017

Original Amount
of Loan

5,000.00

Cumulative Payment
To Date

-

Balance Outstanding at
Close of This Period

5,000.00

Election: ☐ Primary ☐ General ☐ Other (specify):

Terms: Date Incurred _____ Date Due _____ Interest Rate _____ % (apr) ☐ Secured

List All Endorsers or Guarantors (if any) to Item B

1. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding:
\$

2. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding:
\$

3. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding:
\$

SUBTOTALS This Period This Page (optional)

TOTALS This Period (last page in this line only)

Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.

89040761386

Name of Committee (in Full) Salute America Political Action Committee				
A. Full Name, Mailing Address and ZIP Code of Loan Source Erica Jerselson 4485 Fieldston Road Riverdale, NY 10471	Original Amount of Loan 5,000.00	Cumulative Payment To Date -	Balance Outstanding at Close of This Period 5,000.00	
Election: ☐ Primary ☐ General ☐ Other (specify):				
Terms: Date Incurred _____ Date Due _____ Interest Rate _____ % (apr) ☐ Secured				
List All Endorsers or Guarantors (if any) to Item A				
1. Full Name, Mailing Address and ZIP Code	Name of Employer			
	Occupation			
	Amount Guaranteed Outstanding: \$			
2. Full Name, Mailing Address and ZIP Code	Name of Employer			
	Occupation			
	Amount Guaranteed Outstanding: \$			
3. Full Name, Mailing Address and ZIP Code	Name of Employer			
	Occupation			
	Amount Guaranteed Outstanding: \$			
B. Full Name, Mailing Address and ZIP Code of Loan Source Ludwig Jerselson 4485 Fieldston Road Riverdale, NY 10471				
		Original Amount of Loan 5,000.00	Cumulative Payment To Date -	Balance Outstanding at Close of This Period 5,000.00
Election: ☐ Primary ☐ General ☐ Other (specify):				
Terms: Date Incurred _____ Date Due _____ Interest Rate _____ % (apr) ☐ Secured				
List All Endorsers or Guarantors (if any) to Item B				
1. Full Name, Mailing Address and ZIP Code	Name of Employer			
	Occupation			
	Amount Guaranteed Outstanding: \$			
2. Full Name, Mailing Address and ZIP Code	Name of Employer			
	Occupation			
	Amount Guaranteed Outstanding: \$			
3. Full Name, Mailing Address and ZIP Code	Name of Employer			
	Occupation			
	Amount Guaranteed Outstanding: \$			
SUBTOTALS This Period This Page (optional)				
TOTALS This Period (last page in this line only)				
Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.				

89040761387

FEDERAL ELECTION COMMISSION
999 E Street, N.W.
Washington, D.C. 20463

FIRST GENERAL COUNSEL'S REPORT

RAD Referral 88NF 3-11
Staff Member: George Rishel

SOURCE: INTERNALLY GENERATED
RESPONDENTS:

EXECUTIVE SESSION

JUN 07 1988

Salute America Political Action Committee
and Levi Rabinowitz, as treasurer

RELEVANT STATUTES: 2 U.S.C. § 433(c)
2 U.S.C. § 434(a)(4)(A)(iv)
11 C.F.R. § 102.2(a)(2)
11 C.F.R. § 104.5(c)(2)(i)(B)

INTERNAL REPORTS CHECKED: Referral Materials

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

The Reports Analysis Division ("RAD") referred the above
nine committees to the Office of the General Counsel on April 7,

89040761388

1988. The basis for the attached referral is the committees' failure to file the 1987 Year End Report or to do so in a timely fashion.

II. FACTUAL AND LEGAL ANALYSIS

A. Filing of Reports

The Federal Election Campaign Act of 1971, as amended ("the Act"), provides that for unauthorized committees filing quarterly, such committees shall file the Year End Report for years in which no regularly scheduled elections are held no later than January 31 of the following calendar year. 2 U.S.C. § 434(a)(4)(A)(iv). Thus, the due date for the 1987 Year End Report was January 31, 1988. The following committees did not file the 1987 Year End Report by this date:

Name of Committee

Date Report Filed

89040761389

Salute America PAC

Not Filed

Accordingly, the Office of the General Counsel recommends that the Commission open Matters Under Review and find reason to believe these nine committees and their treasurers violated 2 U.S.C. § 434(a)(4)(A)(iv).

B. Changes of Treasurer and Address

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C. Merger

This Office further notes that three of the referred committees are currently respondents in open MURs.

8 9 0 4 0 7 6 1 3 9 1

The MUR involving Salute America PAC (MUR 2597) includes a failure to file finding. The Commission recently found reason to believe, and the matter has not yet proceeded to conciliation, thus merger is also appropriate in this matter.

Therefore, this Office recommends merger of the current referrals involving Salute America PAC with current open MURs involving these committees.

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

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89040761390

IV. RECOMMENDATIONS

1. Open Matters Under Review with respect to the following committees and find reason to believe the following committees and their treasurers violated 2 U.S.C. § 434(a)(4)(A)(iv):
 - a.
 - b.
 - c.
 - d.
 - e.

f.

g.

h.

i. Salute America Political Action Committee and Levi Rabinowitz, as treasurer.

2. Find reason to believe the following committees and their treasurers violated 2 U.S.C. § 433(c):

a.

b.

3.

4. Merge RAD Referral 88NF-11 (Salute America PAC) with MUR 2597.

5. Enter into conciliation with the following committees and their treasurers prior to a finding of probable cause to believe:

a.

b.

c.

d.

e.

f.

89040761397

g.

6. Approve the attached letters and factual and legal analyses to the respective committees listed in recommendation 1.
7. Approve the attached proposed conciliation agreements to the respective committees listed in recommendation 5.

Lawrence M. Noble
General Counsel

Date

5/18/88

BY:


Lois G. Lerner
Associate General Counsel

Attachments

1. Referral Materials
2. Report Filed After Referrals
3. Letters and Factual and Legal Analyses (9)
and Proposed Conciliation Agreements (7)

89040761398

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

RAD REFERRAL
88NF 3-11

(MURS 2623 -
2630)

Salute America Political Action
Committee and Levi Rabinowitz,
as treasurer

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the
Federal Election Commission executive session of June 7, 1988,
do hereby certify that the Commission decided by a vote of
5-0 to take the following actions with respect to the
above-captioned matters:

(continued)

Federal Election Commission
Certification for RAD 88NF 3-11
June 7, 1988

Page 2

1. Open Matters Under Review with respect to the following committees and find reason to believe the following committees and their treasurers violated 2 U.S.C. § 434(a)(4)(A)(iv):
 - a.
 - b.
 - c.
 - d.
 - e.
 - f.
 - g.
 - h. Salute America Political Action Committee and Levi Rabinowitz, as treasurer.

2.

(continued)

89040761400

Federal Election Commission
Certification for RAD 88NF 3-11
June 7, 1988

Page 3

3. Merge RAD Referral 88NF-11 (Salute America PAC) with MUR 2597.
4. Enter into conciliation with the following committees and their treasurers prior to a finding of probable cause to believe:
 - a.
 - b.
 - c.
 - d.
 - e.
 - f.
 - g.
5. Direct the Office of the General Counsel to send appropriate letters and factual and legal analyses pursuant to the above actions.

(continued)

89040761401

Federal Election Commission
Certification for RAD 88 NF 3-11
June 7, 1988

Page 4

6. Approve the proposed conciliation agreements, as amended, to the respective committees listed in action number 4 noted above.

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

Attest:

6-9-88

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

89040701402



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 15, 1988

Levi Rabinowitz, Treasurer
Salute America Political
Action Committee
1747 Pennsylvania Avenue, N.W.
Washington, D.C. 20006

RE: MUR 2630
Salute America Political
Action Committee and Levi
Rabinowitz, as treasurer

Dear Mr. Rabinowitz:

On June 7, 1988, the Federal Election Commission found that there is reason to believe Salute America Political Action Committee ("Committee") and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iv), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). 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, 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.

On June 7, 1988, the Commission also determined to merge this matter with MUR 2597. Both matters will now be known as MUR 2630.

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

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plm

Levi Rabinowitz
Page 2

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 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.

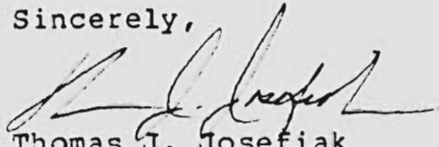
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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 Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,


Thomas J. Josefiak
Chairman

Enclosures
Factual and Legal Analysis
Procedures
Designation of Counsel Form

39040761404

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
FEDERAL ELECTION COMMISSION

In the Matter of)
)
Salute America PAC and Levi)
Rabinowitz, as treasurer)

88 JUL -1 PM 3:41
MUR 2630

GENERAL COUNSEL'S REPORT

SENSITIVE

I. BACKGROUND

On April 5, 1988 the Commission found reason to believe Salute America PAC and Levi Rabinowitz, as treasurer, ("the Committee") violated 2 U.S.C. § 434(a)(4) by failing to file and to timely file a number of reports. 1/ Underlying the Commission's determination was a complaint filed on behalf of the Democratic Congressional Campaign Committee alleging that Salute America had both failed to timely file and was affiliated with the Friends of Vin Weber, an authorized committee of a candidate. 2/

Additionally, on June 7, 1988, the Commission found reason to believe the Committee violated 2 U.S.C. § 434(a)(4)(A)(iv) by failing to timely file its 1987 Year End Report. The Committee now requests pre-probable cause conciliation. Because of reported excessive contributions, irregularities in the Committee's

1/ The complaint in this matter was initially captioned MUR 2526. The Reports Analysis Division referred the Committee to the Office of the General Counsel on February 24, 1988. On April 5, 1988 the Commission determined to open a MUR (MUR 2597) and merged MUR 2526 into MUR 2597. Subsequently, the Committee was again referred to this Office for failure to file. On June 6, 1988, the Commission determined to open a MUR (MUR 2630) and merged MUR 2597 into MUR 2630.

2/ The General Counsel's Report in MUR 2526 recommended that the Commission find reason to believe both committees violated 2 U.S.C. § 433 by failing to amend their Statements of Organization to report their affiliated status. It was determined, however, that the better course would be to take no action at this time as to these possible violations pending Salute America's response to interrogatories.

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reports, and the unresolved issue of the Committee's status, this Office recommends that the Commission decline to enter into pre-probable cause conciliation at this time.

II. ANALYSIS

A. Possible Violations On The 1986 Year End Report

The Commission's interrogatories required Salute America to file its missing reports. On May 24, 1988, the Committee submitted a combined report for the period spanning October 1, 1986 through December 31, 1986. A review of this report reveals other possible violations of the Act. 3/

First, confusion exists regarding the status of the Committee's obligations. As noted in the General Counsel's Report dated March 28, 1988, the Committee's 1987 April Quarterly Report indicated on Schedule D \$60,000 in debts owed to 12 individuals that were incurred in an earlier reporting period. The Committee's newly filed report, however, reports the receipt of these monies on Schedule C as loans made to the Committee. Neither report includes all the information required on Schedules C and D. (The Committee has consistently reported \$10,500 received from two other persons as loans on Schedule C.)

3/ Salute America's reports reveal very little activity since its 1985 October Quarterly Report when the Committee changed treasurers. Since that date the Committee has received only the \$70,500 in receipts discussed above, and has made contributions to only three committees, two of which were refunded either entirely or in part. However, the Committee has disbursed almost the entire amount of the remainder of its cash on hand as operating expenditures to its treasurer. For example, the Committee's 1986 Year End Report reveals \$48,041.86 in disbursements to its treasurer for "Mgmt Fee & Exp". The 1987 April Quarterly Report noted \$11,150 disbursed to the treasurer out of total operating expenditures of \$12,869.94. For the 1987 July Quarterly Report, the treasurer received fees of \$1,300 out of operating expenditures totalling \$1,833.48.

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Pursuant to 2 U.S.C. § 434(b)(3)(E), political committees are required to report the identification of each person who makes a loan to a reporting committee during the reporting period, together with the identification of any endorser or guarantor of such loan, and the date and amount or value of such loan. Pursuant to 2 U.S.C. § 434(b)(8), political committees are required to report the amount and nature of outstanding debts and obligations owed by such a political committee. The Commission's Regulations further require that committees report on Schedules C or D, as appropriate, the amount and nature of outstanding debts and obligations owed by or to the reporting committee. 11 C.F.R. § 104.3(d). Additionally, outstanding debts and obligations owed by a political committee must be continuously reported on separate schedules together with a statement explaining the circumstances and conditions under which each debt and obligation was incurred or extinguished. 11 C.F.R. § 104.11(a).

In the instant case, Salute America has failed to meet the requirements of the Act and the Regulations. The Committee's reports are unclear whether these obligations are loans or debts; they have inconsistently reported these obligations on either Schedules C or D and even these schedules are not complete. 4/ Therefore, this Office recommends that the Commission find reason to believe Salute America and its treasurer violated 2 U.S.C. § 434(b) and 11 C.F.R. § 104.11(a).

4/ The Committee has not included the dates these obligations were incurred. Its Schedules C do not include the terms of the agreements and the Schedules D fail to disclose the purposes of the debts.

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Second, the Committee's 1986 Year End Report lists apparent excessive contributions made to the Friends of Senator D'Amato and the Friends of Vin Weber, as well as a facially excessive loan from Morris Talansky. 5/ The Act defines a contribution to include a loan or anything of value made by any person for the purpose of influencing a federal election. 2 U.S.C. § 431(8)(A)(i). Pursuant to 2 U.S.C. § 441a(a)(1)(A), political committees that are not multicandidate committees are limited to contributing \$1,000 per election to an authorized committee of a candidate. Additionally, the Act provides that no person may make a contribution to an unauthorized political committee that exceeds \$5,000 per year. 2 U.S.C. § 441a(a)(1)(C). Political committees are prohibited from accepting contributions exceeding the Act's limitations. 2 U.S.C. § 441a(f).

On October 2, 1986, respondents made a \$2,500 contribution to the Friends of Senator D'Amato and a \$5,000 contribution to the Friends of Vin Weber. A review of the Committee's reports reveals that Salute America has not qualified as a multicandidate committee, and may contribute only \$1,000 per election to an authorized committee of a candidate. Thus, these contributions exceed the Committee's limitation at 2 U.S.C. § 441a(a)(1)(A). Therefore, this Office recommends that the Commission find reason to believe Salute America PAC and Levi Rabinowitz, as treasurer,

5/ This facially excessive loan has been consistently reported on Schedule C and does not compose the \$60,000 discussed previously.

violated 2 U.S.C. § 441a(a)(1)(A). Additionally, the Committee accepted a \$5,500 loan from Morris Talansky during the 1987 July Quarterly reporting period. This amount exceeds the Committee's limit at 2 U.S.C. § 441a(a)(1)(C). Thus, this Office further recommends that the Commission find reason to believe the Committee and its treasurer violated 2 U.S.C. § 441a(f). 6/

B. Status of Salute America's Relationship With The Friends of Vin Weber

As noted in the General Counsel's report dated March 28, 1988, the complaint in this matter alleged that Salute America was acting as a conduit for contributions to the Friends of Vin Weber. The complaint thus erroneously concluded that the two committees are affiliated. It was decided that reason to believe determinations should be made on the issue of affiliation only after a complete review of Salute America's reports. Because Salute America has not yet filed its 1987 Year End Report, the attached subpoena for documents requires the Committee to provide this report to the Commission. After reviewing it, this Office will report to the Commission with appropriate recommendations.

6/ The Friends of Vin Weber reports refunding its entire contribution on November 3, 1986. Because of this timely refund, this Office makes no recommendations regarding Friends of Vin Weber's receipt of this excessive contribution. Friends of Senator D'Amato reported refunding the excessive portion of its contribution on March 26, 1987. Although this refund was not made in a timely manner, because the Friends of Senator D'Amato was not referred to this Office, and because it is not the subject of a pending RAD Referral, this Office makes no recommendation as to this committee. Additionally, consistent with this Office's past actions of not pursuing individuals with small amounts of excessive contributions, no recommendation is made regarding Mr. Talansky. A refund of the excessive portion will be sought at conciliation.

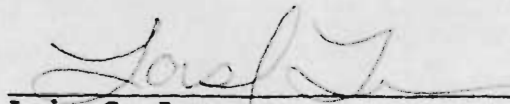
89040761409

III. RECOMMENDATIONS

1. Find reason to believe Salute America PAC and Levi Rabinowitz, as treasurer, violated 2 U.S.C. §§ 441a(a)(1)(A), 441a(f), 434(b) and 11 C.F.R. § 104.11(a).
2. Decline at this time to enter into pre-probable cause conciliation negotiations with Salute America PAC and Levi Rabinowitz, as treasurer.
3. Approve the attached subpoena, factual and legal analysis and letter.

Lawrence M. Noble
General Counsel

By:


Lois G. Lerner
Associate General Counsel

6/30/88
Date

Attachments

1. Response
2. Factual and Legal Analysis
3. Subpoena
4. Letter

Staff Person: Patty Reilly

89040761410

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Salute America PAC and Levi) MUR 2630
Rabinowitz, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on July 7, 1988 the Commission decided by a vote of 5-0 to take the following actions in MUR 2630:

1. Find reason to believe Salute America PAC and Levi Rabinowitz, as treasurer, violated 2 U.S.C. §§ 441a(a)(1)(A), 441a(f), 434(b) and 11 C.F.R. § 104.11(a).
2. Decline at this time to enter into pre-probable cause conciliation negotiations with Salute America PAC and Levi Rabinowitz, as treasurer.
3. Approve the subpoena, factual and legal analysis and letter, as recommended in the General Counsel's Report signed June 30, 1988.

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

Attest:

7-7-88

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in the Office of the Commission Secretary: Fri., 7-1-88, 3:41
Circulated on a 48-hour tally basis: Tues., 7-5-88, 11:00
Deadline for vote: Thurs., 7-7-88, 11:00



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 12, 1988

Martin Mendelsohn, Esquire
Suite 1100
1700 K Street, N.W.
Washington, D.C. 20006

RE: MUR 2630
Salute America PAC and
Levi Rabinowitz, as
treasurer

Dear Mr. Mendelsohn:

On April 5, 1988, the Commission found reason to believe Salute America PAC and Levi Rabinowitz, as treasurer, ("the Committee") violated 2 U.S.C. § 434(a)(4). Additionally, on June 7, 1988, the Commission found reason to believe the Committee violated 2 U.S.C. § 434(a)(4)(A)(iv). Moreover, on July 7, 1988, the Commission found reason to believe your clients violated 2 U.S.C. §§ 441a(a)(1)(A), 441a(f), 434(b) and 11 C.F.R. § 104.11(a). The Factual and Legal Analysis which formed a basis for the Commission's latest findings is attached for your information.

Additionally, on July 7, 1988, the Commission reviewed your request for pre-probable cause conciliation 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. The attached subpoena requires you to produce additional information in this matter within 15 days.

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.

89040761412

Martin Mendelsohn, Esquire
Page 2

If you have any questions please contact Patty Reilly, the
attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

Lois G. Lerner

By: Lois G. Lerner
Associate General Counsel

39040761413

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

)
)
)
)
)

MUR 2630

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

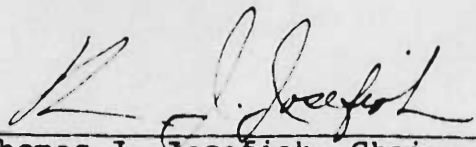
TO: Salute America PAC
c/o Martin Mendelsohn, Esquire
Suite 1100
1700 K Street, N.W.
Washington, D.C. 20006

Pursuant to 2 U.S.C. § 437d(a)(1) and (3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and subpoenas you to produce the documents requested on the attachment to this Order. Legible copies which, where applicable, show both sides of the documents, may be substituted for originals.

Such answers must be submitted under oath and must be forwarded to the Commission along with the requested documents within 15 days of your receipt of this Order and Subpoena.

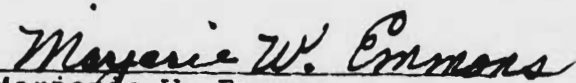
89040761414

WHEREFORE, the Chairman of the Federal Election Commission has
hereunto set his hand on this 11th day of July, 1988.



Thomas J. Josefiak, Chairman
Federal Election Commission

ATTEST:



Marjorie W. Emmons
Secretary to the Commission

Attachments
Questions (1 page)

39040761415

LAW OFFICES
MARTIN MENDELSON
SUITE 1100
1700 K STREET, N. W.
WASHINGTON, D. C. 20006
(202) 833-1893

@oct 2
RECEIVED
FEDERAL ELECTION COMMISSION

88 AUG -4 AM 10:54

August 1, 1988

Patty Reilly, Esquire
Federal Elections Commission
Washington, D.C. 20463

Re: MUR 2630
Salute America Political
Action Committee and
Levi Rabinowitz, as Treasurer

88 AUG -4 PM 12:30

RECEIVED
FEDERAL ELECTION COMMISSION

Dear Ms. Reilly:

Enclosed is a copy of a letter received in my office on Monday, August 1, 1988. As you can see, the document is confusing at best. I have instructed Mr. Rabinowitz to seek further clarification, but as I explained to you on the phone last week, the problems are compounded by the fact that the individual who was previously preparing the required reports prepared those reports in ways that confused us so that Mr. Rabinowitz is unable to accurately reconstruct what happened before he came to see me in late 1987.

Mr. Rabinowitz assures me he relied upon legal advice and was referred by his then counsel to the individual who prepared the reports. We have also attempted to contact Mr. Morris Talansky to clarify the \$5,500 figure which was reported as received by the committee during the 1986 July quarterly reporting period. We have been informed that Mr. Talansky is traveling in the People Republic of China.

I will be in Argentina until Tuesday, August 9 in connection with another case. When I return, I hope to have some clarifications from Mr. Rabinowitz so that the interrogatories can be properly responded to.

I again apologize for this delay, but as neither I or Mr. Rabinowitz have all of the documents in our possession, we have been unable to intelligently respond.

Sincerely,

Martin Mendelsohn

MM:jps
Enclosure

39040761416

October 7, 1986

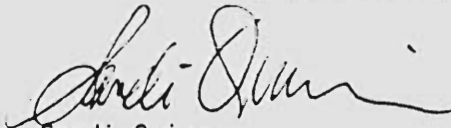
Mr. Levy Rabinowitz
Treasurer, Salute America
1747 Pennsylvania Avenue
Suite 1000
Washington, DC 20006

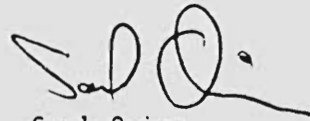
Dear Mr. Rabinowitz:

For your records, we wish to clarify the treatment to be accorded to the \$10,000 check that we recently sent to Salute America. The check represents two loans in the amounts of \$5,000 each, one such loan being made by each of us.

We understand that the loans are considered to be "contributions" to a multi-candidate political committee under the applicable federal laws and that the loans will be recorded in Salute America's books and reports as \$5,000 "contributions" from each of us.

Sincerely yours,


Sandi Quinn


Saul Quinn

89040761417

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: July 22, 1988ANALYST: Robert B. DiNardo

I. COMMITTEE: Salute America Political Action
Committee (C00194837)
Levi Rabinowitz, Treasurer
1240 24th Street, NW, Suite #1000^{1/}
Washington, DC 20037

II. RELEVANT STATUTE: 2 U.S.C. §434(a)(4)(A)(i) and (iv)
11 CFR 104.5(c)(1)(i)
11 CFR 104.5(c)(2)(i)

III. BACKGROUND:

Failure to Timely File Reports

The Salute America Political Action Committee ("the Committee") failed to file three (3) reports in a timely manner for the 1987-1988 election cycle (see Chart). The 1987 Mid-Year Report was filed ninety-five (95) calendar days late, while the 1987 Year End and 1988 April Quarterly Reports have yet to be filed.

On March 14, 1988, the Reports Analysis Division ("RAD") analyst called the treasurer of the Committee, Mr. Levi Rabinowitz. Mr. Rabinowitz was not available so the RAD analyst left a message (Attachment 6). Later that day Mr. Rabinowitz called the RAD analyst. The RAD analyst told Mr. Rabinowitz that the Commission had not received the Committee's 1987 Year End Report. Mr. Rabinowitz said the Committee's attorney was working on the report, which would be sent after March 21, 1988 (Attachment 7).

On March 22, 1988, a Chronic Late Filer Notice was sent to the Committee for failure to file the 1987 Mid-Year and 1987 Year End Reports in a timely manner (Attachment 8). The Notice advised the Committee that any additional late filing of reports could result in legal enforcement action.

^{1/} Former address - 1747 Pennsylvania Avenue, NW,
Washington, DC 20006.

89040761918

SALUTE AMERICA POLITICAL ACTION
COMMITTEE
REPORTS ANALYSIS OGC REFERRAL
PAGE 2

Subsequent to the mailing of the Chronic Late Filing Notice, the Committee failed to file the 1988 April Quarterly Report. The Committee was notified on March 22, 1988 that the April Quarterly Report was due April 15, 1988 (Attachment 9). On May 20, 1988, the Committee was sent a Non-Filer Notice (Attachment 10).

On June 30, 1988, the RAD analyst called the Committee's treasurer, Mr. Levi Rabinowitz. Mr. Rabinowitz was out of town so the RAD analyst left a message that the Commission had not received the Committee's 1988 April Quarterly Report (Attachment 11).

As of this date the 1987 Year End and 1988 April Quarterly Reports have not been filed.

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

39040761419

3 9 0 4 0 7 6 1 4 2 0

LATE FILING HISTORY

REPORT TYPE	PRIOR NOTICE	DUE DATE	NON-FILER NOTICE	DATE FILED
1987 Mid-Year*/ (1/1/87-6/30/87)	7/7/87 (Attachment ₂)	7/31/87	not sent	11/3/87 (Attachment ₃)
1987 Year End (7/1/87-12/31/87)	12/18/87 (Attachment ₄)	1/31/88	2/19/88 (Attachment ₅)	not filed
1988 April Quarterly	3/22/88 (Attachment ₈)	4/15/88	5/20/88 (Attachment ₁₀)	not filed

*/Quarterly Reports were filed for the 1987 Mid-Year period. The Committee filed an April Quarterly Report covering 1/1/87 - 3/31/87 on May 26, 1987, and a July Quarterly Report covering 4/1/87 - 6/30/87 on November 3, 1987.

FEDERAL ELECTION COMMISSION
1987-1988
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

Attachment #1

DATE 12JUL88

PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
						TYPE OF FILER
SALUTE AMERICA POLITICAL ACTION COMMITTEE				ID #C00194837	NON-PARTY NON-QUALIFIED	
CONNECTED ORGANIZATION: NONE						
	1987 APRIL QUARTERLY	10,500	12,869	1JAN87 -31MAR87	9	87FEC/468/2416
	REQUEST FOR ADDITIONAL INFORMATION			1JAN87 -31MAR87	4	87FEC/495/0737
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN87 -31MAR87	1	87FEC/496/1816
	JULY QUARTERLY	1,600	1,833	1APR87 -30JUN87	8	87FEC/492/4615
	REQUEST FOR ADDITIONAL INFORMATION			1APR87 -30JUN87	1	87FEC/495/0735
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1APR87 -30JUN87	6	87FEC/496/1810
	NOTICE OF FAILURE TO FILE			31DEC87	1	88FEC/510/2964
	1988 MISCELLANEOUS NOTICE FROM FEC			22MAR88	1	88FEC/515/0275
	NOTICE OF FAILURE TO FILE			1JAN88 -31MAR88	1	88FEC/526/0147
	TOTAL	12,100	0 14,702	0	32	TOTAL PAGES

All reports have been reviewed.

Ending cash on hand as of 6/30/87: \$174.48

Debts and Obligations owed by the committee as of 6/30/87: \$70,500

89040761421

FEDERAL ELECTION COMMISSION
1985-1986
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

DATE 21JUL88

PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION TYPE OF FILER
SALUTE AMERICA POLITICAL ACTION COMMITTEE						ID #C00194837 NON-PARTY NON-QUALIFIED
CONNECTED ORGANIZATION: NONE						
	1985 STATEMENT OF ORGANIZATION			18MAR85	3	85FEC/369/0751
	REQUEST FOR ADDITIONAL INFORMATION			26JUN85	1	85FEC/376/5418
	STATEMENT OF ORGANIZATION - AMENDMENT			31JUL85	3	85FEC/384/4237
	STATEMENT OF ORGANIZATION - AMENDMENT			8NOV85	3	85FEC/390/5451
	REQUEST FOR ADDITIONAL INFORMATION 2ND			18JUL85	2	85FEC/379/4800
	MID-YEAR REPORT	25,495	23,084	14MAR85 -30JUN85	12	85FEC/384/4240
	OCTOBER QUARTERLY	0	1,500	1JUL85 -30SEP85	4	87FEC/462/1863
	YEAR-END	0	0	1OCT85 -31DEC85	2	87FEC/462/1868
	NOTICE OF FAILURE TO FILE			1JUL85 -31DEC85	1	87FEC/453/0274
1986	APRIL QUARTERLY	0	800	1JAN86 -31MAR86	3	87FEC/462/1871
	NOTICE OF FAILURE TO FILE			1JAN86 -31MAR86	1	87FEC/453/0275
	JULY QUARTERLY	0	0	1APR86 -30JUN86	2	87FEC/462/1875
	NOTICE OF FAILURE TO FILE			1APR86 -30JUN86	1	87FEC/453/0276
	OCTOBER QUARTERLY	0	0	1JUL86 -30SEP86	2	87FEC/462/1878
	NOTICE OF FAILURE TO FILE			1JUL86 -30SEP86	1	87FEC/453/0277
	NOTICE OF FAILURE TO FILE			1OCT86 -24NOV86	1	87FEC/453/0278
	YEAR-END - AMENDMENT	65,100	62,432	1OCT86 -31DEC86	12	88FEC/528/0456
	NOTICE OF FAILURE TO FILE			25NOV86 -31DEC86	1	87FEC/469/1630
1987	MISCELLANEOUS REPORT TO FEC			19MAR87	3	87FEC/463/2909
	TOTAL	90,595	0 87,816	0	58	TOTAL PAGES

All reports have been reviewed.

Ending cash on hand as of 12/31/86: \$2,777.90

Debts and Obligations owed by the committee as of 12/31/86: \$60,000.00

89040761422

SEMI-ANNUAL REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

July 7, 1987

WHO MUST FILE

ALL PARTY COMMITTEES AND PACS (NONCONNECTED COMMITTEES AND SEPARATE SEGREGATED FUNDS) must file a report in July.

REPORTING DATES

Semiannual. The Mid-Year Report is due July 31 and must disclose financial activity that occurred from January 1 through June 30, 1987. Committees which have previously filed 1987 reports should only report activity from the closing date of the last report filed.

Monthly. If the committee chooses to file on a monthly basis, the next monthly report is due July 20 and must disclose financial activity from June 1 through June 30, 1987. Monthly reports are due by the 20th of each month and cover all financial activity of the previous month.

WHAT MUST BE REPORTED

A report must disclose all receipts and disbursements (not previously reported) that occurred during the reporting period. A newly registered political committee filing its first report should also include all amounts received and expended before the committee registered. See 11 CFR 104.3. For more detailed information on reporting instructions, consult your Campaign Guide.

WHERE AND HOW TO FILE

Committees should consult the instructions on the enclosed FEC FORM 3X for details. Affix the peel-off label from the envelope to line 1 of the report. Any corrections should be made directly on the label.

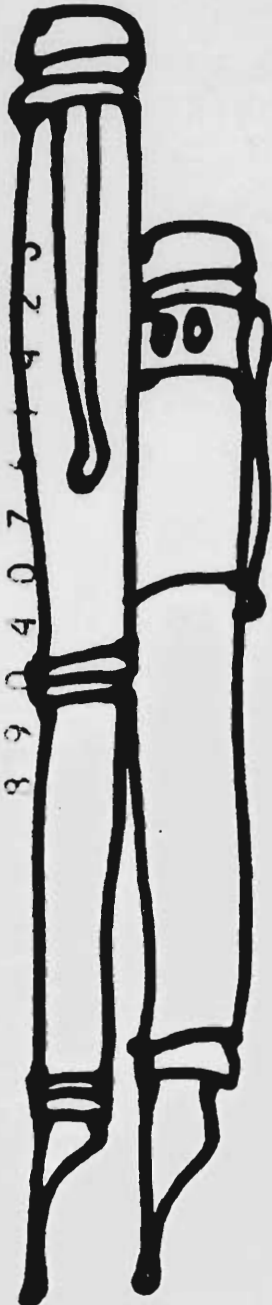
CHANGE IN FILING FREQUENCY

Committees that wish to change their reporting schedule (for example, from monthly to semiannual) must notify the Commission by sending a letter with the next report due under their current reporting schedule. Committees may change their filing frequency only once a year.

COMPLIANCE

Political committees are responsible for filing all reports required under the Act in a timely fashion. Committees and treasurers who file late reports, or fail to file reports, are subject to enforcement action. Illegible reports and reports submitted on non-FEC forms will not be accepted; committees filing such documents will be required to refile.

(over)



1987 UPCOMING FILING SCHEDULE PARTIES AND PACS

Retain this report notice for future reference. The next notice will be sent December 18, 1987. Also, see the January 1987 issue of the FEC Record, which lists 1987 reporting dates.

SEMIANNUAL FILERS

Report	Period Covered 1/	Reg./Cert.	Filing
		Mailing Date 2/	Date 2/
Mid-Year	01/01 - 06/30	07/31/87	07/31/87
Year-End	07/01 - 12/31	01/31/88	01/31/88

MONTHLY FILERS

Report	Period Covered 1/	Reg./Cert.	Filing
		Mailing Date 2/	Date 2/
July	06/01 - 06/30	07/20/87	07/20/87
August	07/01 - 07/31	08/20/87	08/20/87
September	08/01 - 08/31	09/20/87	09/20/87
October	09/01 - 09/30	10/20/87	10/20/87
November	10/01 - 10/31	11/20/87	11/20/87
December	11/01 - 11/30	12/20/87	12/20/87
Year-End	12/01 - 12/31	01/31/88	01/31/88

1/ A newly registered committee should refer to "WHAT MUST BE REPORTED," on the reverse side.

2/ Reports sent by certified or registered mail must be postmarked by the mailing date. Reports mailed first class or hand delivered must be received by the filing date.

**FOR INFORMATION, Call: Information Services Division
202/376-3120 or 800/424-9530**

89040701424

For a Political Committee Other Than an Authorized Committee

Attachment #3
RECEIVED
FEDERAL ELECTION COMMISSION
FEB 1987

(Summary Page)

27 MAY -3 AM 8-50

1. Name of Committee (in Full)

Levi Rabinowitz Political Action Committee

Address (Number and Street)

1747 Pennsylvania Ave., NW
Suite 1000

City, State and ZIP Code

Washington, DC 20006

☐ Check here if address is different than previously reported.

2. FEC Identification Number

000194837

3. ☐ This committee qualified as a multicandidate committee during this Reporting Period on N/A

4. TYPE OF REPORT (Check appropriate space)

(a) ☐ April 15 Quarterly Report ☐ October 15 Quarterly Report

☒ July 15 Quarterly Report ☐ January 31 Year End Report

☐ July 31 Mid Year Report (Non-Election Year Only)

☐ Monthly Report for _____

☐ Twelfth day report preceding _____ Type of Election

election on _____ in the State of _____

☐ Thirtieth day report following the General Election

on _____ in the State of _____

☐ Termination Report

(b) Is this Report an Amendment?

☐ YES

☒ NO

SUMMARY

5. Covering Period 4/1/87 through 6/30/87

6. (a) Cash on hand January 1, 19 _____

(b) Cash on Hand at Beginning of Reporting Period _____

(c) Total Receipts (from Line 18) _____

(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)

7. Total Disbursements (from Line 26) _____

8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d)) _____

9. Debts and Obligations Owed TO The Committee (Itemize on Schedule C or Schedule D)

10. Debts and Obligations Owed BY the Committee (Itemize on Schedule C or Schedule D)

COLUMN A
This Period

COLUMN B
Calendar Year-to-Date

	\$ 2777.90
\$ 407.96	
\$ 1600.00	\$ 12,100.00
\$ 2007.96	\$ 14,877.90
\$ 1835.48	\$ 14,703.42
\$ 174.48	\$ 174.48
\$	
\$ 70,500.00	

For further information contact:

Federal Election Commission
500 E Street, N.W.
Washington, D.C. 20463
Tel. Room 888-434-6330
Local 225-396-3130

Type or Print Name of Treasurer

Levi Rabinowitz

Date

7/2/87

NOTE: Signing this report is a declaration of 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 13/80

89040761423
37034924613

REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

December 18, 1987

WHO MUST FILE

ALL PARTY COMMITTEES and PACs (NON-CONNECTED COMMITTEES AND SEPARATE SEGREGATED FUNDS) must file a Year End Report in January.

REPORTING DATES

Semiannual. The Year End Report is due January 31, 1988, and must disclose financial activity that occurred from July 1 through December 31, 1987. Committees which have previously filed 1987 reports should only report activity from the closing date of the last report filed.

Monthly. Committees that choose to file on a monthly basis must file the Year End Report due January 31, 1988. The report must disclose financial activity from December 1 through December 31, 1987. All other monthly reports are due by the 20th of each month and cover all financial activity of the previous month.

WHAT MUST BE REPORTED

A report must disclose all receipts and disbursements that occurred during the reporting period. A newly registered political committee filing its first report should also include all amounts received and expended before the committee registered. See 11 CFR 104.3. For more detailed information on reporting instructions, consult your Campaign Guide.

WHERE AND HOW TO FILE

Committees should consult the instructions on the enclosed FEC Form 3X for details. Affix the peel-off label from the envelope to line 1 of the report. Any corrections in the information should be made directly on the label.

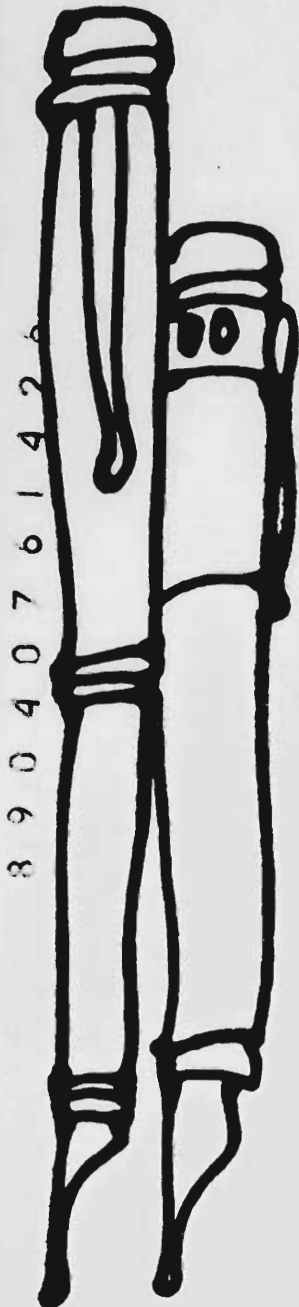
CHANGE IN FILING FREQUENCY

Committees that wish to change their reporting schedule (for example, from semiannual to monthly) must notify the Commission by sending a letter with the next report due under their current reporting schedule. Committees may change their filing frequency only once a year.

COMPLIANCE

Political committees are responsible for filing all reports required under the Act in a timely fashion. Committees and treasurers who file late reports, or fail to file reports, are subject to enforcement action. Illegible reports and reports submitted on non-FEC forms will not be accepted; committees filing such documents will be required to refile.

FOR INFORMATION, Call: Information Services Division
202/376-3120 or 800/424-9530





FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

20-7

FEB 19 1988

Levi Rabinowitz, Treasurer
Salute America Political
Action Committee
1747 Pennsylvania Avenue, N.W.
Washington, DC 20006

Identification Number: C00194837

Reference: Year End Report (through 12/31/87)

Dear Mr. Rabinowitz:

It has come to the attention of the Federal Election Commission ("the Commission") that your committee may be in violation of 2 U.S.C. §434(a) for failing to file the above referenced Report of Receipts and Disbursements. You were notified previously of the due date for this report.

It is important that you file this report immediately with the Federal Election Commission, 999 E Street, NW, Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of the report or the relevant portions should also be filed with the Secretary of State or equivalent State officer. See 2 U.S.C. §439.

Although the Commission may initiate an audit or legal enforcement action concerning this matter, your prompt response and a letter of explanation will be taken into consideration.

If you have any questions, please contact Donald Averett on our toll-free number (800) 424-9530. Our local number is (202) 376-2480.

Sincerely,

A handwritten signature in dark ink, appearing to read "John D. Gibson".

John D. Gibson
Assistant Staff Director
Reports Analysis Division

39040761427
33735102964

MEMORANDUM TO THE FILES:

COMMITTEE: Salute America Political Action Committee
I.D. NUMBER: C00194837
CONTACT: Levi Rabinowitz, treasurer
DATE: March 14, 1988
ANALYST: Robert B. DiNardo
SUBJECT: 1987 Year End Report

I called Mr. Rabinowitz at 9:30 to notify him that the FEC has not received the Committee's 1987 Year End Report. Mr. Rabinowitz was not available, so I left a message that I called.

89040761428

MEMORANDUM TO THE FILES:

COMMITTEE: Salute America Political Action Committee
I.D. NUMBER: C00194837
CONTACT: Levi Rabinowitz, treasurer
DATE: March 14, 1988
ANALYST: Robert B. DiNardo
SUBJECT: 1987 Year End Report

Mr. Rabinowitz called back at 10:35 and said that the 1987 Year End Report was being prepared. He said that the Committee finally received the records from the bookkeeper and that the Committee's attorney is preparing the report and the amendments to the previous RFAI. Due to the attorney's illness with the flu and his daughter's operation, Mr. Rabinowitz said that the reports would not get to the FEC until after March 21, 1988.

8904076142.9



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

FE-6

MAR 22 1988

Levi Rabinowitz, Treasurer
Salute America Political Action
Committee
1747 Pennsylvania Avenue, N.W.
Washington, DC 20006

Identification Number: C00194837

Reference: 1987-1988 Election Cycle Reports

Dear Mr. Rabinowitz:

It has come to the attention of the Federal Election Commission ("the Commission") that your committee may have violated 2 U.S.C. 5434(a), by failing to timely file Reports of Receipts and Disbursements. The following is a list of the reports in question.

<u>Report Type</u>	<u>Due Date</u>	<u>Date Filed</u>
Mid-Year* (1/1/87-6/30/87)	7/31/87	11/3/87
Year End (7/1/87-12/31/87)	1/31/88	not filed

***Quarterly Reports Submitted**

Timely filing is a specific requirement of the Federal Election Campaign Act ("the Act") and is essential to fulfilling the public disclosure concept embodied in that law. The Commission views the untimely filing of reports as a serious violation of the Act. This communication is to advise you that, notwithstanding any matters which may be pending before the Commission, any additional report which is not submitted in a timely manner by your committee may result in the Commission initiating legal enforcement or audit action.

You may submit a letter of explanation in response to this notification. If, however, you have any questions, please feel free to contact Robert DiNardo on our toll-free number, (800) 424-9530. Our local number is (202) 376-2480.

Sincerely,

Lisa J. Stolaruk
Chief, Party/Non-Party Branch
Reports Analysis Division

0 9 0 3 3 17 560 1247 350

QUARTERLY REPORT NOTICE

FEDERAL ELECTION COMMISSION

PARTIES AND PACS

March 22, 1988

REPORT	REPORTING PERIOD	REG./CERT. MAILING DATE*	FILING DATE
April Quarterly	01/01/88**-03/31/88	04/15/88	04/15/88

WHO MUST FILE

PARTY COMMITTEES AND PACS (NONCONNECTED COMMITTEES AND SEPARATE SEGREGATED FUNDS) filing on a quarterly basis must file their next report in April.

WHAT MUST BE REPORTED

All financial activity (not previously reported) that occurred during the reporting period..

REPORTING FORMS

Party committees and PACs use Form 3X (enclosed).

WHERE TO FILE

Consult the instructions on the back of the Form 3X Summary Page. Note state filing requirements also.

LABEL

Committees should affix the peel-off label from the envelope to Line 1 of the report. Corrections should be made on the label.

PRE-ELECTION REPORTING

Committees which make contributions or expenditures (including independent expenditures) in connection with a candidate's primary election, must also file a 12-day Pre-Election Report if the activity was not previously reported. See the January Record.

LAST-MINUTE INDEPENDENT EXPENDITURES

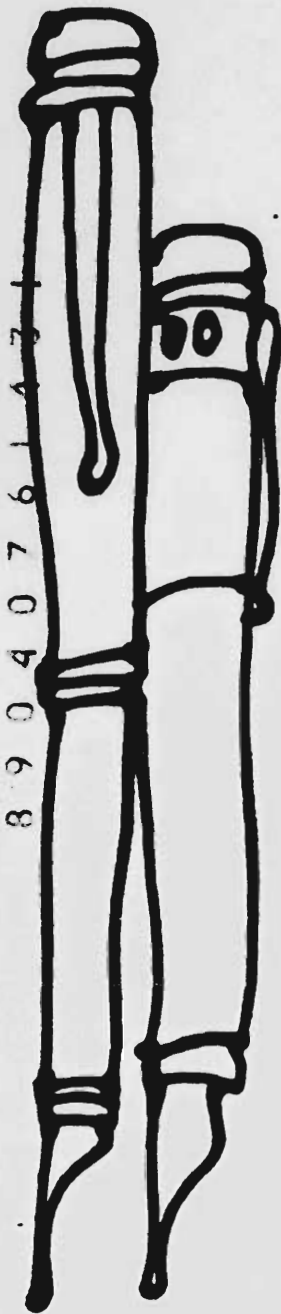
Committees which make an independent expenditure of \$1,000 or more, after the 20th day, but more than 24 hours before an election, must report it within 24 hours.

COMPLIANCE

TREASURERS OF POLITICAL COMMITTEES ARE RESPONSIBLE FOR FILING ALL REPORTS ON TIME. FAILURE TO DO SO IS SUBJECT TO ENFORCEMENT ACTION. COMMITTEES FILING ILLEGIBLE REPORTS OR USING NON-FEC FORMS WILL BE REQUIRED TO REFILE.

*Reports sent by registered or certified mail must be postmarked by the mailing date. Otherwise, they must be received by the filing date.

**From the date of registration, or the close of books of the last report filed, whichever is later.





FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20541

80-7

Levi Rabinowitz, Treasurer
Salute America Political Action
Committee
1747 Pennsylvania Avenue, NW
Washington, DC 20006

MAY 20 1988

Identification Number: C00194837

Reference: April Quarterly Report (1/1/88-3/31/88)

Dear Mr. Rabinowitz:

It has come to the attention of the Federal Election Commission ("the Commission") that your committee may be in violation of 2 U.S.C. §434(a) for failing to file the above referenced Report of Receipts and Disbursements. You were notified previously of the due date for this report.

It is important that you file this report immediately with the Federal Election Commission, 999 E Street, NW, Washington, DC 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of the report or the relevant portions should also be filed with the Secretary of State or equivalent State officer. See 2 U.S.C. §439.

Although the Commission may initiate an audit or legal enforcement action concerning this matter, your prompt response and a letter of explanation will be taken into consideration.

If you have any questions, please contact Robert DiNardo on our toll-free number (800) 424-9530. Our local number is (202) 376-2480.

Sincerely,

A handwritten signature in cursive script, reading "John D. Gibson".

John D. Gibson
Assistant Staff Director
Reports Analysis Division

MEMORANDUM TO THE FILES:

COMMITTEE: Salute America Political Action Committee
I.D. NUMBER: C00194837
CONTACT: Levi Rabinowitz, Treasurer
DATE: June 30, 1988
ANALYST: Robert B. DiNardo
SUBJECT: Non-filing of 1988 April Quarterly Report

I called Mr. Rabinowitz at 2:35 P.M. Mr. Rabinowitz was out of town so I left a message that the Commission has not received the Committee's 1988 April Quarterly Report. I also left my phone number in case Mr. Rabinowitz has any questions.

89040761433

FEDERAL

RECEIVED

FEDERAL ELECTION COMMISSION
999 E Street, N.W.
Washington, D.C. 20463

SENSITIVE

88 AUG 20 11:37 **FIRST GENERAL COUNSEL'S REPORT**

RAD Referral: 88NF-35
Staff Member: Patty Reilly

SOURCE: INTERNALLY GENERATED

RESPONDENTS: Salute America PAC and Levi Rabinowitz,
as treasurer

RELEVANT STATUTES: 2 U.S.C. § 434(a)(4)(A)(i) and (iv)

INTERNAL REPORTS CHECKED: Disclosure Reports

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF THE MATTER

On July 22, 1988, the Reports Analysis Division ("RAD") referred Salute America PAC and Levi Rabinowitz, as treasurer, ("the Committee") to the Office of the General Counsel. The basis of the attached referral is the Committee's failure to timely file three reports during the 1987-1988 election cycle. Additionally, the Committee has been identified as a chronic late filer. 1/

II. FACTUAL AND LEGAL ANALYSIS

A. Failures to Timely File

The Act requires political committees other than authorized committees to file on either a quarterly or a monthly basis. 2 U.S.C. § 434(a)(4). Those opting to file quarterly are required to file quarterly reports during an election year. These reports must be filed on the 15th day after the last day of each calendar quarter, except that the last report for the year must be filed no later than January 31 of the following calendar

1/ As discussed at Section B, Salute America PAC is also a respondent in MUR 2630, a matter involving failure to file and to timely file.

EXECUTIVE SESSION
SEP 7 1988

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year. 2 U.S.C. § 434(a)(4)(A)(i). In non-election years, an unauthorized committee is required to file twice yearly at six month intervals, with the first report due on July 31 and the second report due on January 31 of the following calendar year. 2 U.S.C. § 434(a)(4)(A)(iv).

In the instant case, the Committee has failed to meet the Act's requirements. The Committee's 1987 Mid Year Report was due on July 31, 1987. The Committee failed to file this report until November 3, 1987. 2/ The Committee's 1987 Year End Report was due on January 31, 1988. To date, this report has not been filed. 3/ On March 22, 1988, RAD sent the Committee a chronic late filer notice for failure to timely file its 1987 reports and advised that any additional late reports would result in legal enforcement action. The Committee then failed to file its 1988 April Quarterly Report. RAD sent the Committee a notice of failure to file this report on May 20, 1988.

The Act requires committees to file regular reports in a timely manner. The Committee failed to timely file its 1987 Mid-Year Report and has yet to file its 1987 Year End and 1988 April Quarterly Report. Therefore, this Office recommends that the Commission open a MUR and find reason to believe Salute America Political Action Committee and Levi Rabinowitz, as treasurer,

2/ As a quarterly filer, the Committee needed to file only twice yearly in a non-election year. Nevertheless, the Committee filed quarterly in the beginning of 1987, with an April Quarterly Report filed on May 26, 1987, and a July Quarterly filed on November 3, 1987.

3/ On June 6, 1988, the Commission opened a MUR and found reason to believe Salute America violated 2 U.S.C. § 434(a)(4)(A)(iv) by failing to timely file this report.

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violated 2 U.S.C. §§ 434(a)(4)(A)(i) and (iv). 4/

B. Current Enforcement Actions

Salute America is the subject of an enforcement action in MUR 2630 as a result of its failure to continuously report its outstanding debts and obligations, receipt of excessive contributions, and its failure to file and to timely file its 1985 Year End Report, 1986 Reports and 1987 Year End Report. 5/ Because this referral encompasses much of the same investigation in MUR 2630, this Office recommends that the Commission merge MUR 2630 with this matter. 6/

4/ Pursuant to the Office of the General Counsel's May 9, 1988 Memorandum to the Commission, late filers are now sent a proposed conciliation agreement with reason to believe notifications. Because Salute America is currently a respondent in a MUR with unresolved issues of fact, this Office has not attached such a proposed conciliation agreement.

5/ This matter arose pursuant to a complaint filed on behalf of the Democratic Senatorial Committee and was captioned MUR 2526. The Reports Analysis Division referred the Committee to the Office of the General Counsel on February 24, 1988 for failure to file and to timely file its 1985 Year End and 1986 Reports. On April 5, 1988, the Commission determined to open a MUR (MUR 2597) and merged MUR 2526 into MUR 2597. Subsequently, the Committee was again referred to this Office for failure to file its 1987 Year End Report. On June 6, 1988, the Commission determined to open a MUR (MUR 2630) and merged MUR 2597 into MUR 2630.

6/ The complaint in MUR 2526 also alleged that Salute America PAC was affiliated with the Friends of Vin Weber and that the committees had violated the Act's registration requirements by failing to note this alleged affiliated status on their Statements of Organization. The General Counsel's Report in MUR 2526 recommended that the Commission find reason to believe both committees violated 2 U.S.C. § 433 by failing to amend their Statements of Organization to report their affiliated status. It was determined, however, that the better course would be to take no action at this time as to these possible violations pending Salute America's response to interrogatories. As noted in the General Counsel's Report dated June 30, 1988, because Salute America has yet to file all required reports, it is the opinion of this Office that no recommendations should be made as to the Friends of Vin Webber until all reports are received. On August 4, 1988 Salute America partially responded to the Commission's discovery request. Other information was promised at that time but has not been received. It appears that at the expiration of the response date for the enclosed subpoena, a subpoena enforcement action may be necessary.

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III. RECOMMENDATIONS

1. Open a MUR as to RAD 88NF-35.
2. Merge MUR 2630 with former RAD 88NF-35.
3. Find reason to believe Salute America PAC and Levi Rabinowitz, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i) and (iv).
4. Approve the attached subpoena, factual and legal analysis, and letter.

Lawrence M. Noble
General Counsel

Date

8/26/88

By:

Lois G. Lerner
Associate General Counsel

Attachments

1. RAD Referral
2. Factual and Legal Analysis
3. Subpoena
4. Letter

Staff Person: Patty Reilly

89040761437



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

MEMORANDUM TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

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

DATE: SEPTEMBER 1, 1988

SUBJECT: OBJECTION TO RAD Ref. 88NF-35: FIRST G.C. REPORT
SIGNED AUGUST 26, 1988

The above-captioned document was circulated to the Commission on Tuesday, August 30, 1988 at 11:00 A.M.

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

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

This matter will be placed on the Executive Session agenda for September 7, 1988.

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

89040761438

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Salute America PAC and Levi) RAD Referral 88NF-35
Rabinowitz, as treasurer)

(MUR
2689)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of September 7, 1988, do hereby certify that the Commission decided by a vote of 5-0 to take the following actions with respect to RAD Referral 88NF-35:

1. Open a Matter Under Review (MUR).
2. Merge MUR 2630 with former RAD 88NF-35.
3. Find reason to believe Salute America PAC and Levi Rabinowitz, as treasurer, violated 2 U.S.C. §§ 434(a)(4)(A)(i) and (iv).
4. Approve the subpoena, factual and legal analysis, and letter attached to the General Counsel's report dated August 26, 1988, subject to amendment of the factual and legal analysis as agreed during the meeting.

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

Attest:

9-8-88

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

99040761439



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 15, 1988

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Martin Mendelsohn, Esquire
Suite 1100
1700 K Street, N.W.
Washington, D.C. 20006

RE: MUR 2689
Salute America PAC
and Levi Rabinowitz,
as treasurer

Dear Mr. Mendelsohn:

On September 7, 1988, the Federal Election Commission found that there is reason to believe your clients, Salute America PAC and Levi Rabinowitz, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(i) and (iv), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information. Additionally, on September 7, 1988, the Commission merged MUR 2630 into this matter. All correspondence should reference MUR 2689.

Under the Act, you have an opportunity to demonstrate that no action should be taken against your clients. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Statements should be submitted under oath. All responses to the enclosed Subpoena to Produce Documents must be submitted within 15 days of your receipt of this subpoena. Any additional materials or statements you wish to submit should accompany the response to the subpoena.

In the absence of any additional information which demonstrates that no further action should be taken against your clients, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

89040761440

Martin Mendelsohn, Esquire
Page 2

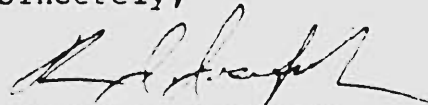
If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of the General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, requests for pre-probable cause conciliation will not be entertained 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.

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 Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,



Thomas J. Josefiak
Chairman

Enclosures
Subpoena
Factual and Legal Analysis
Procedures

89040761441

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

)
)
)

MUR 2689

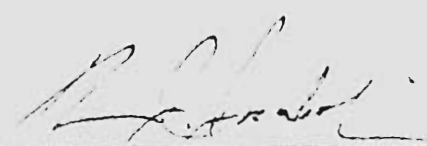
SUBPOENA TO PRODUCE DOCUMENTS

To: Levi Rabinowitz, treasurer
Salute America PAC
c/o Marvin Mendelsohn
Suite 1100
1700 K Street, N.W.
Washington, D.C. 20006

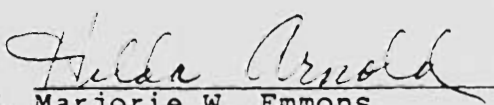
Pursuant to 2 U.S.C. § 437d(a)(3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby subpoenas the documents listed on the attachment to this subpoena.

Notice is given that these documents must be submitted to the Office of the General Counsel, Federal Election Commission, 999 E Street, N.W., Washington, D.C. 20463, within 15 days of your receipt of this subpoena. Legible copies which, where applicable, show both sides of the documents may be substituted for originals.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C. on this, 14th day of September, 1988.


Thomas J. Josefiak, Chairman
Federal Election Commission

ATTEST:


for Marjorie W. Emmons
Secretary to the Commission

Attachment
Document Request (1 page)

89040761442

LAW OFFICES
MARTIN MENDELSON
SUITE 1100
1700 K STREET, N.W.
WASHINGTON, D. C. 20006
(202) 833-1893

062#620
RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

88 OCT -7 AM 11:00

Mon 26 89

October 5, 1988

Patty Riley, Esquire
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: Salute America Political Action Committee
FEC Identification Number C00194837

Dear Ms. Riley:

Enclosed are the completed forms for the above-referenced committee. We regret that these forms have not been signed but please be assured that a copy of the completed forms with signatures will be forwarded to you as soon as possible.

Thank you for your continued patience.

Sincerely,


Janet Harouff
Paralegal

88 OCT -7 PM 3:17

RECEIVED
FEDERAL ELECTION COMMISSION

890040761440

88 OCT -7 AM 11:00

USE FEC MAILING LABEL
OR
TYPE OR PRINT

1. NAME OF COMMITTEE (in full) Salute America Political Action Committee		2. FEC IDENTIFICATION NUMBER C00194837
ADDRESS (number and street) ☐ Check if different than previously reported 1240 24th Street, N.W., Suite 1000		
CITY, STATE and ZIP CODE Washington, D.C. 20037		
		3. ☐ This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (date).

4. TYPE OF REPORT

(a) ☐ April 15 Quarterly Report

☐ July 15 Quarterly Report

☒ October 15 Quarterly Report

☐ January 31 Year End Report

☐ July 31 Mid Year Report (Non-election Year Only)

☐ Termination Report

Monthly Report Due On:

☐ February 20	☐ June 20	☐ October 20
☐ March 20	☐ July 20	☐ November 20
☐ April 20	☐ August 20	☐ December 20
☐ May 20	☐ September 20	☐ January 31

☐ Twelfth day report preceding _____ (Type of Election)

election on _____ in the State of _____

☐ Thirtieth day report following the General Election on _____ in the State of _____

(b) Is this Report an Amendment? ☐ YES ☐ NO

SUMMARY

5. Covering Period	COLUMN A This Period	COLUMN B Calendar Year-to-Date
July 1, 1987 through September 30, 1987		
6. (a) Cash on Hand January 1, 1987		\$ 2,777.90
(b) Cash on Hand at Beginning of Reporting Period	\$ 232.96	
(c) Total Receipts (from Line 18)	\$ - 0 -	\$ 12,100.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 232.96	\$ 14,877.90
7. Total Disbursements (from Line 28)	\$ - 0 -	\$ 14,644.94
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 232.96	\$ 232.96
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	\$	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-376-3120
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	\$60,000.00	

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

Type or Print Name of Treasurer
Levi Rabinowitz

Signature of Treasurer

Date

October 5, 1988

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

FEC FORM 3X

(revised 4/87)

Name of Committee (in full) **Salute America Political Action Committee** Report Covering the Period From: **July 1, 1987** to **September 30, 1987**

I. RECEIPTS	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date	
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees			
(i) Itemized (use Schedule A)	- 0 -	- 0 -	11(a)(i)
(ii) Unitemized	- 0 -	1,600.00	11(a)(ii)
(iii) Total of contributions from individuals	- 0 -	- 0 -	11(a)(iii)
(b) Political Party Committees	- 0 -	- 0 -	11(b)
(c) Other Political Committees (such as PACs)	- 0 -	- 0 -	11(c)
(d) TOTAL CONTRIBUTIONS (add 11(a)(iii), (b), and (c)).	- 0 -	1,600.00	11(d)
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES	- 0 -		12
13. ALL LOANS RECEIVED	- 0 -	10,500.00	13
14. LOAN REPAYMENTS RECEIVED	- 0 -	- 0 -	14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	- 0 -	- 0 -	15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	- 0 -	- 0 -	16
17. OTHER RECEIPTS (Dividends, Interest, etc.)	- 0 -	- 0 -	17
18. TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)	- 0 -	12,100.00	18
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES	- 0 -		19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES	- 0 -		20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	- 0 -		21
22. INDEPENDENT EXPENDITURES (use Schedule E)	- 0 -		22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (use Schedule F)	- 0 -		23
24. LOAN REPAYMENTS MADE	- 0 -		24
25. LOANS MADE	- 0 -		25
26. REFUNDS OF CONTRIBUTIONS TO:			
(a) Individuals/Persons Other Than Political Committees	- 0 -		26(a)
(b) Political Party Committees	- 0 -		26(b)
(c) Other Political Committees (such as PACs)	- 0 -		26(c)
(d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c))	- 0 -		26(d)
27. OTHER DISBURSEMENTS	- 0 -		27
28. TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	- 0 -		28
III. NET CONTRIBUTIONS/OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans) (from Line 11(d))	- 0 -		29
30. TOTAL CONTRIBUTION REFUNDS (from Line 26(d))	- 0 -		30
31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from 29)	- 0 -		31
32. TOTAL OPERATING EXPENDITURES (from Line 19)	- 0 -		32
33. OFFSETS TO OPERATING EXPENDITURES (from Line 15)	- 0 -		33
34. NET OPERATING EXPENDITURES (subtract Line 33 from 32)	- 0 -		34

39040761445

88 OCT -7 AM 11:00

USE FEC MAILING LABEL
OR
TYPE OR PRINT

1. NAME OF COMMITTEE (in full) Salute America Political Action Committee		2. FEC IDENTIFICATION NUMBER C00194837
ADDRESS (number and street) ☐ Check if different than previously reported 1240 24th Street, N.W., Suite 1000		
CITY, STATE and ZIP CODE Washington, D.C. 20037		3. ☐ This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (date)

4. TYPE OF REPORT

- (a) ☒ April 15 Quarterly Report
☐ July 15 Quarterly Report
☐ October 15 Quarterly Report
☐ January 31 Year End Report
☐ July 31 Mid Year Report (Non-election Year Only)
☐ Termination Report

Monthly Report Due On:

- ☐ February 20 ☐ June 20 ☐ October 20
☐ March 20 ☐ July 20 ☐ November 20
☐ April 20 ☐ August 20 ☐ December 20
☐ May 20 ☐ September 20 ☐ January 31

- ☐ Twelfth day report preceding _____ (Type of Election)
election on _____ in the State of _____
☐ Thirtieth day report following the General Election on _____
in the State of _____

- (b) Is this Report an Amendment? ☐ YES ☐ NO

SUMMARY

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period <u>Jan. 1, 1988</u> through <u>March 31, 1988</u>		
6. (a) Cash on Hand January 1, 19 <u>88</u>		\$ 232.96
(b) Cash on Hand at Beginning of Reporting Period	\$ 232.96	
(c) Total Receipts (from Line 18)	\$ 10,500.00	\$ 10,500.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 10,732.96	\$ 10,732.96
7. Total Disbursements (from Line 28)	\$ 10,500.00	\$ 10,500.00
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 232.96	\$ 232.96
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	\$	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-376-3120
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	\$ 50,000.00	

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

Type or Print Name of Treasurer
Levi Rabinowitz

Signature of Treasurer

Date

October 5, 1988

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

FEC FORM 3X
(revised 4/87)

Name of Committee (in full)
Salute America Political Action Committee

Report Covering the Period
 From **Jan. 1, 1988** to **March 31, 1988**

	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date	
I. RECEIPTS			
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees			
(i) Itemized (use Schedule A)	10,500.00	10,500.00	11(a)(i)
(ii) Unitemized	- 0 -	- 0 -	11(a)(ii)
(iii) Total of contributions from individuals	10,500.00	10,500.00	11(a)(iii)
(b) Political Party Committees	- 0 -	- 0 -	11(b)
(c) Other Political Committees (such as PACs)	- 0 -	- 0 -	11(c)
(d) TOTAL CONTRIBUTIONS (add 11(a)(iii), (b), and (c))	10,500.00	10,500.00	11(d)
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES	- 0 -	- 0 -	12
13. ALL LOANS RECEIVED	- 0 -	- 0 -	13
14. LOAN REPAYMENTS RECEIVED	- 0 -	- 0 -	14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	- 0 -	- 0 -	15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	- 0 -	- 0 -	16
17. OTHER RECEIPTS (Dividends, Interest, etc.)	- 0 -	- 0 -	17
18. TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)	10,500.00	10,500.00	18
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES	500.00	500.00	19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES	- 0 -	- 0 -	20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	- 0 -	- 0 -	21
22. INDEPENDENT EXPENDITURES (use Schedule E)	- 0 -	- 0 -	22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (use Schedule F)	- 0 -	- 0 -	23
24. LOAN REPAYMENTS MADE	10,000.00	10,000.00	24
25. LOANS MADE	- 0 -	- 0 -	25
26. REFUNDS OF CONTRIBUTIONS TO:			
(a) Individuals/Persons Other Than Political Committees	- 0 -	- 0 -	26(a)
(b) Political Party Committees	- 0 -	- 0 -	26(b)
(c) Other Political Committees (such as PACs)	- 0 -	- 0 -	26(c)
(d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c))	- 0 -	- 0 -	26(d)
27. OTHER DISBURSEMENTS	- 0 -	- 0 -	27
28. TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	10,500.00	10,500.00	28
III. NET CONTRIBUTIONS/OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans) (from Line 11(d))	10,500.00		29
30. TOTAL CONTRIBUTION REFUNDS (from Line 26(d))			30
31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from 29)			31
32. TOTAL OPERATING EXPENDITURES (from Line 19)	500.00	500.00	32
33. OFFSETS TO OPERATING EXPENDITURES (from Line 15)	- 0 -	- 0 -	33
34. NET OPERATING EXPENDITURES (subtract Line 33 from 32)	500.00	500.00	34

7
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This information is required to be furnished by contributors to the committee. It is to be used for the purpose of identifying the contributors for the committee's purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

Salute America Political Action Committee

A. Full Name, Mailing Address and ZIP Code Helen Hackel Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$ 5,000.00	Date (month, day, year) 2/16/88	Amount of Each Receipt this Period 5,000.00
B. Full Name, Mailing Address and ZIP Code Morris Tolansky Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$ 5,000.00	Date (month, day, year) 2/12/88	Amount of Each Receipt this Period 5,000.00
C. Full Name, Mailing Address and ZIP Code Jack Bendheim Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year) 2/4/88	Amount of Each Receipt this Period 500.00
D. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
E. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
F. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
G. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only)

10,500.00

89040761443

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)

Salute America Political Action Committee

A. Full Name, Mailing Address and ZIP Code Martin Mendelsohn, Esquire 1700 K Street, N.W., Ste. 1100 Washington, D.C. 20006	Purpose of Disbursement Legal Fees Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 2/23/88	Amount of Each Disbursement This Period 500.00
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)

500.00

39040761449

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)

Salute America Political Action Committee

A. Full Name, Mailing Address and ZIP Code Sidney Olson 5700 Collins Ave, Apt. 142 Miami Beach, FL 33140	Purpose of Disbursement Loan Repayment Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 2/26/88	Amount of Each Disbursement This Period 5,000.00
B. Full Name, Mailing Address and ZIP Code Miriam Olson 5700 Collins Ave., Apt. 142 Miami Beach, FL 33140	Purpose of Disbursement Loan Repayment Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 2/26/88	Amount of Each Disbursement This Period 5,000.00
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)

10,000.00

89040761450

USE FEC MAILING LABEL
OR
TYPE OR PRINT

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

88 OCT -7 AM 11:00

1. NAME OF COMMITTEE (in full) Salute America Political Action Committee		2. FEC IDENTIFICATION NUMBER C00194837
ADDRESS (number and street) ☐ Check if different than previously reported 1240 24th Street, N.W., Suite 1000		
CITY, STATE and ZIP CODE Washington, D.C. 20037		
3. ☐ This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (date).		

4. TYPE OF REPORT

(a) ☐ April 15 Quarterly Report

☒ July 15 Quarterly Report

☐ October 15 Quarterly Report

☐ January 31 Year End Report

☐ July 31 Mid Year Report (Non-election Year Only)

☐ Termination Report

Monthly Report Due On:

☐ February 20	☐ June 20	☐ October 20
☐ March 20	☐ July 20	☐ November 20
☐ April 20	☐ August 20	☐ December 20
☐ May 20	☐ September 20	☐ January 31

☐ Twelfth day report preceding _____ (Type of Election)

election on _____ in the State of _____

☐ Thirtieth day report following the General Election on _____ in the State of _____

(b) Is this Report an Amendment? ☐ YES ☐ NO

SUMMARY

5. Covering Period	COLUMN A This Period	COLUMN 3 Calendar Year-to-Date
April 1, 1987 through June 30, 1987		
6. (a) Cash on Hand January 1, 19 <u>87</u>		\$ 2,777.90
(b) Cash on Hand at Beginning of Reporting Period	\$ 407.96	
(c) Total Receipts (from Line 18)	\$ 1,600.00	\$12,100.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 2,007.96	\$14,877.90
7. Total Disbursements (from Line 28)	\$ 1,775.00	\$14,644.94
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 232.96	\$ 232.96
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	\$	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-376-3120
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	\$60,000.00	
I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.		
Type or Print Name of Treasurer Levi Rabinowitz		
Signature of Treasurer		Date September 1988

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

FEC FORM 3X

(revised 4/87)

USE FEC MAILING LABEL
OR
TYPE OR PRINT

1. NAME OF COMMITTEE (in full) Salute America Political Action Committee		2. FEC IDENTIFICATION NUMBER C00194837
ADDRESS (number and street) ☐ Check if different than previously reported 1240 24th Street, N.W., Suite 1000		
CITY, STATE and ZIP CODE Washington, D.C. 20037		3. ☐ This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (date).

4. TYPE OF REPORT

- (a) ☐ April 15 Quarterly Report
☒ July 15 Quarterly Report
☐ October 15 Quarterly Report
☐ January 31 Year End Report
☐ July 31 Mid Year Report (Non-election Year Only)
☐ Termination Report

Monthly Report Due On:

- | | | |
|--------------------------------------|---------------------------------------|--------------------------------------|
| ☐ February 20 | ☐ June 20 | ☐ October 20 |
| ☐ March 20 | ☐ July 20 | ☐ November 20 |
| ☐ April 20 | ☐ August 20 | ☐ December 20 |
| ☐ May 20 | ☐ September 20 | ☐ January 31 |

- ☐ Twelfth day report preceding _____ (Type of Election)
election on _____ in the State of _____
☐ Thirtieth day report following the General Election on _____
in the State of _____

- (b) Is this Report an Amendment? ☐ YES ☐ NO

SUMMARY

5. Covering Period	COLUMN A This Period	COLUMN B Calendar Year-to-Date
<u>April 1, 1987</u> through <u>June 30, 1987</u>		
6. (a) Cash on Hand January 1, 19 <u>87</u>		\$ 2,777.90
(b) Cash on Hand at Beginning of Reporting Period	\$ 407.96	
(c) Total Receipts (from Line 18)	\$ 1,600.00	\$12,100.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 2,007.96	\$14,877.90
7. Total Disbursements (from Line 28)	\$ 1,775.00	\$14,644.94
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 232.96	\$ 232.96
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	\$	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-376-3120
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	\$60,000.00	
I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.		
Type or Print Name of Treasurer Levi Rabinowitz		
Signature of Treasurer		Date September 1988

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

FEC FORM 3X
(revised 4/87)

88 OCT -7 AM 11:00

USE FEC MAILING LABEL
OR
TYPE OR PRINT

1. NAME OF COMMITTEE (in full) Salute America Political Action Committee		2. FEC IDENTIFICATION NUMBER C00194837
ADDRESS (number and street) ☐ Check if different than previously reported 1240 24th Street, N.W., Suite 1000		
CITY, STATE and ZIP CODE Washington, D.C. 10037		
3. ☐ This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (date).		

4. TYPE OF REPORT

(a) ☐ April 15 Quarterly Report

☐ July 15 Quarterly Report

☐ October 15 Quarterly Report

☒ January 31 Year End Report

☐ July 31 Mid Year Report (Non-election Year Only)

☐ Termination Report

Monthly Report Due On:

☐ February 20 ☐ June 20 ☐ October 20
☐ March 20 ☐ July 20 ☐ November 20
☐ April 20 ☐ August 20 ☐ December 20
☐ May 20 ☐ September 20 ☐ January 31

☐ Twelfth day report preceding _____ (Type of Election)

election on _____ in the State of _____

☐ Thirtieth day report following the General Election on _____ in the State of _____

(b) Is this Report an Amendment? ☐ YES ☐ NO

SUMMARY

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period <u>Oct. 1, 1987</u> through <u>Dec. 31, 1987</u>		
6. (a) Cash on Hand January 1, 19 <u>87</u>		\$ 2,777.90
(b) Cash on Hand at Beginning of Reporting Period	\$ 232.96	12,100.00
(c) Total Receipts (from Line 18)	\$ - 0 -	\$ 12,100.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 232.96	\$ 14,877.90
7. Total Disbursements (from Line 28)	\$ - 0 -	\$ 14,644.94
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 232.96	\$ 232.96
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	\$	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-376-3120
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	\$ 60,000.00	

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

Type or Print Name of Treasurer
Levi Rabinowitz

Signature of Treasurer

Date

October 5, 1988

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

FEC FORM 3X

(revised 4/87)

Name of Committee (in full)
Salute America Political Action Committee

Report Covering the Period
From Oct. 1, 1987 to Dec. 31, 1987

I. RECEIPTS		COLUMN A Total This Period	COLUMN B Calendar Year-To-Date	
11. CONTRIBUTIONS (other than loans) FROM:				
(a) Individuals/Persons Other Than Political Committees				
(i) Itemized (use Schedule A)		- 0 -	- 0 -	11(a)(i)
(ii) Unitemized		- 0 -	1,600.00	11(a)(ii)
(iii) Total of contributions from individuals		- 0 -	- 0 -	11(a)(iii)
(b) Political Party Committees		- 0 -	- 0 -	11(b)
(c) Other Political Committees (such as PACs)		- 0 -	- 0 -	11(c)
(d) TOTAL CONTRIBUTIONS (add 11(a)(iii), (b), and (c))		- 0 -	1,600.00	11(d)
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES		- 0 -	- 0 -	12
13. ALL LOANS RECEIVED		- 0 -	10,500.00	13
14. LOAN REPAYMENTS RECEIVED		- 0 -	- 0 -	14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)		- 0 -	- 0 -	15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		- 0 -	- 0 -	16
17. OTHER RECEIPTS (Dividends, Interest, etc.)		- 0 -	- 0 -	17
18. TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)		- 0 -	12,100.00	18
II. DISBURSEMENTS				
19. OPERATING EXPENDITURES		- 0 -		19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES		- 0 -		20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		- 0 -		21
22. INDEPENDENT EXPENDITURES (use Schedule E)		- 0 -		22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (use Schedule F)		- 0 -		23
24. LOAN REPAYMENTS MADE		- 0 -		24
25. LOANS MADE		- 0 -		25
26. REFUNDS OF CONTRIBUTIONS TO:				
(a) Individuals/Persons Other Than Political Committees		- 0 -		26(a)
(b) Political Party Committees		- 0 -		26(b)
(c) Other Political Committees (such as PACs)		- 0 -		26(c)
(d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c))		- 0 -		26(d)
27. OTHER DISBURSEMENTS		- 0 -		27
28. TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)		- 0 -		28
III. NET CONTRIBUTIONS/OPERATING EXPENDITURES				
29. TOTAL CONTRIBUTIONS (other than loans) (from Line 11(d))		- 0 -		29
30. TOTAL CONTRIBUTION REFUNDS (from Line 26(d))		- 0 -		30
31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from 29)		- 0 -		31
32. TOTAL OPERATING EXPENDITURES (from Line 19)		- 0 -		32
33. OFFSETS TO OPERATING EXPENDITURES (from Line 15)		- 0 -		33
34. NET OPERATING EXPENDITURES (subtract Line 33 from 32)		- 0 -		34

99040761454

88 OCT -7 AM 11:00

USE FEC MAILING LABEL
OR
TYPE OR PRINT

1. NAME OF COMMITTEE (in full) Salute America Political Action Committee		2. FEC IDENTIFICATION NUMBER C00194837
ADDRESS (number and street) ☐ Check if different than previously reported 1240 24th Street, N.W., Suite 1000		
CITY, STATE and ZIP CODE Washington, D.C. 20037		3. ☐ This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (date).

4. TYPE OF REPORT

(a) ☐ April 15 Quarterly Report☒ July 15 Quarterly Report☐ October 15 Quarterly Report☐ January 31 Year End Report☐ July 31 Mid Year Report (Non-election Year Only)☐ Termination Report

Monthly Report Due On:

☐ February 20	☐ June 20	☐ October 20
☐ March 20	☐ July 20	☐ November 20
☐ April 20	☐ August 20	☐ December 20
☐ May 20	☐ September 20	☐ January 31

☐ Twelfth day report preceding _____
(Type of Election)

election on _____ in the State of _____

☐ Thirtieth day report following the General Election on _____
in the State of _____(b) Is this Report an Amendment? ☐ YES ☐ NO

SUMMARY

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period <u>April 1, 1988</u> through <u>June 30, 1988</u>		
6. (a) Cash on Hand January 1, 19____		\$ 232.96
(b) Cash on Hand at Beginning of Reporting Period	\$ 232.96	
(c) Total Receipts (from Line 18)	\$ 1,100.00	\$ 11,600.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 1,332.96	\$ 11,832.96
7. Total Disbursements (from Line 28)	\$ 1,150.00	\$ 11,650.00
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 182.96	\$ 182.96
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	\$	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-376-3120
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	\$ 50,000.00	

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

Type or Print Name of Treasurer

Signature of Treasurer

Date

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

FEC FORM 3X

(revised 4/87)

Name of Committee (in full) Salute America Political Action Committee		Report Covering the Period From: April 1, 1988 to: June 30, 1988	
		COLUMN A Total This Period	COLUMN B Calendar Year-To-Date
I. RECEIPTS			
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees			
(i) Itemized (use Schedule A)	1,000.00	11,500.00	11(a)(i)
(ii) Unitemized	100.00	100.00	11(a)(ii)
(iii) Total of contributions from individuals	1,100.00	11,600.00	11(a)(iii)
(b) Political Party Committees	- 0 -	- 0 -	11(b)
(c) Other Political Committees (such as PACs)	- 0 -	- 0 -	11(c)
(d) TOTAL CONTRIBUTIONS (add 11(a)(iii), (b), and (c))	1,100.00	11,600.00	11(d)
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES	- 0 -		12
13. ALL LOANS RECEIVED			13
14. LOAN REPAYMENTS RECEIVED	- 0 -		14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	- 0 -		15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	- 0 -		16
17. OTHER RECEIPTS (Dividends, Interest, etc.)	- 0 -		17
18. TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)	1,100.00	11,600.00	18
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES	450.00	950.00	19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES	- 0 -	- 0 -	20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	700.00	700.00	21
22. INDEPENDENT EXPENDITURES (use Schedule E)	- 0 -	- 0 -	22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (use Schedule F)	- 0 -	- 0 -	23
24. LOAN REPAYMENTS MADE	- 0 -	- 0 -	24
25. LOANS MADE	- 0 -	- 0 -	25
26. REFUNDS OF CONTRIBUTIONS TO:			
(a) Individuals/Persons Other Than Political Committees	- 0 -	- 0 -	26(a)
(b) Political Party Committees	- 0 -	- 0 -	26(b)
(c) Other Political Committees (such as PACs)	- 0 -	- 0 -	26(c)
(d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c))	- 0 -	- 0 -	26(d)
27. OTHER DISBURSEMENTS	- 0 -	- 0 -	27
28. TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	1,150.00	11,650.00	28
III. NET CONTRIBUTIONS/OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans) (from Line 11(d))	1,100.00		29
30. TOTAL CONTRIBUTION REFUNDS (from Line 26(d))	- 0 -		30
31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from 29)	1,100.00		31
32. TOTAL OPERATING EXPENDITURES (from Line 19)	450.00		32
33. OFFSETS TO OPERATING EXPENDITURES (from Line 15)	- 0 -		33
34. NET OPERATING EXPENDITURES (subtract Line 33 from 32)	450.00		34

89090761450

purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

Salute America Political Action Committee

89040761457

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Isaac Rokowsky 32 West Maple Avenue Monsey, New York 10952	Self	5/6/88	1,000.00
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation	Aggregate Year-to-Date > \$ 1,000.00	
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation	Aggregate Year-to-Date > \$	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation	Aggregate Year-to-Date > \$	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation	Aggregate Year-to-Date > \$	
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation	Aggregate Year-to-Date > \$	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation	Aggregate Year-to-Date > \$	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation	Aggregate Year-to-Date > \$	
SUBTOTAL of Receipts This Page (optional)			
TOTAL This Period (last page this line number only)			1,000.00

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)

Salute America Political Action Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Levi Rabinowitz 1240 24th St., N.W. Washington, D.C. 20037	Expense Reimbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	5/5/88	100.00
B. Full Name, Mailing Address and ZIP Code Martin Mendelsohn Suite 1100 1700 K Street, N.W. Washington, D.C. 20006	Legal Fees Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	6/15/88	250.00
C. Full Name, Mailing Address and ZIP Code Martin Mendelsohn Suite 1100 1700 K Street, N.W. Washington, D.C. 20006	Legal Fees Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	6/20/88	100.00
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only)

39040761453

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)

Salute America Political Action Committee

A. Full Name, Mailing Address and ZIP Code Licht for Senate Providence, Rhode Island	Purpose of Disbursement Senate, Rhode Island	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	6/10.00	500.00
B. Full Name, Mailing Address and ZIP Code Friends of Vin Weber P.O. Box 1690 Wilmar, NM 56201	Purpose of Disbursement House, Minnesota	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	6/10/88	200.00
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify)		
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify)		
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify)		
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify)		
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify)		
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify)		
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify)		

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only)

700.00

89040761459

LAW OFFICES
MARTIN MENDELSON
SUITE 1100
1700 K STREET, N. W.
WASHINGTON, D. C. 20006
(202) 833-1893

000#935
RECEIVED
FEDERAL ELECTION COMMISSION

88 NOV -7 AM 9:02

Mon 2689

October 21, 1988

89040701460
Patty Riley, Esquire
Office of General Counsel
Federal Elections Commission
999 E Street, N.W.
Washington, D.C. 20463

88 NOV -7 PM 1:19
RECEIVED
FEDERAL ELECTION COMMISSION

Re: Salute America Pac
FEC Identification No. C00194837

Dear Ms. Riley:

Enclosed are the signed copies of the FEC reports for the Salute America PAC. Please note that the only changes are in the report filed for the period April 1, 1987 through June 30, 1987 where we have been able to clarify the source of income and detail the expenditures.

I intend to withdraw from representing Salute America in the very near future.

Sincerely,



Martin Mendelsohn

MM:jph

Enclosure

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee
(Summary Page)

RECEIVED
FEDERAL ELECTION COMMISSION

88 NOV -7 AM 9:02

USE FEC MAILING LABEL
OR
TYPE OR PRINT

1. NAME OF COMMITTEE (in full) Salute America Political Action Committee		2. FEC IDENTIFICATION NUMBER C00194837
ADDRESS (number and street) ☐ Check if different than previously reported 1240 24th Street, N.W., Suite 1000		
CITY, STATE and ZIP CODE Washington, D.C. 20037		
3. ☐ This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (date)		

4. TYPE OF REPORT

- (a) ☐ April 15 Quarterly Report
☒ July 15 Quarterly Report
☐ October 15 Quarterly Report
☐ January 31 Year End Report
☐ July 31 Mid Year Report (Non-election Year Only)
☐ Termination Report
- Monthly Report Due On:
☐ February 20 ☐ June 20 ☐ October 20
☐ March 20 ☐ July 20 ☐ November 20
☐ April 20 ☐ August 20 ☐ December 20
☐ May 20 ☐ September 20 ☐ January 31
- ☐ Twelfth day report preceding _____ (Type of Election)
election on _____ in the State of _____
- ☐ Thirtieth day report following the General Election on _____
in the State of _____

(b) Is this Report an Amendment? ☐ YES ☐ NO

SUMMARY

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period <u>April 1, 1987</u> through <u>June 30, 1987</u>		
6. (a) Cash on Hand January 1, 1987		\$ 2,777.90
(b) Cash on Hand at Beginning of Reporting Period	\$ 407.96	
(c) Total Receipts (from Line 18)	\$ 1,600.00	\$ 12,100.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 2,007.96	\$ 14,877.90
7. Total Disbursements (from Line 28)	\$ 1,775.00	\$ 14,644.94
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 232.96	\$ 232.96
9. Debts and Obligations Owed TO the Committee (itemize all on Schedule C and or Schedule D)	\$	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-376-3120
10. Debts and Obligations Owed BY the Committee (itemize all on Schedule C and or Schedule D)	\$60,000.00	

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

Type or Print Name of Treasurer

Signature of Treasurer

Date

September 1988

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

FEC FORM 3X

(revised 4-87)

DETAILED SUMMARY PAGE

of Receipts and Disbursements

(Page 2, FEC FORM 3X)

Name of Committee (in full) Salute America Political Action Committee		Report Covering the Period From April 1, 1987 To June 30, 1987	
		COLUMN A Total This Period	COLUMN B Calendar Year-To-Date
I. RECEIPTS			
11. CONTRIBUTIONS (other than loans) FROM			
(a) Individuals/Persons Other Than Political Committees			
(i) Itemized (use Schedule A)		- 0 -	- 0 -
(ii) Unitemized		100.00	100.00
(iii) Total of contributions from individuals		- 0 -	- 0 -
(b) Political Party Committees		- 0 -	- 0 -
(c) Other Political Committees (such as PACs)		- 0 -	- 0 -
(d) TOTAL CONTRIBUTIONS (add 11(a)(iii), (b), and (c))		100.00	100.00
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES		- 0 -	- 0 -
13. ALL LOANS RECEIVED		- 0 -	10,500.00
14. LOAN REPAYMENTS RECEIVED		- 0 -	- 0 -
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)		- 0 -	- 0 -
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		1,500.00	1,500.00
17. OTHER RECEIPTS (Dividends, Interest, etc.)		- 0 -	- 0 -
18. TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)		1,600.00	12,100.00
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES		1,775.00	14,644.94
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES		- 0 -	- 0 -
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		- 0 -	- 0 -
22. INDEPENDENT EXPENDITURES (use Schedule E)		- 0 -	- 0 -
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (use Schedule F)		- 0 -	- 0 -
24. LOAN REPAYMENTS MADE		- 0 -	- 0 -
25. LOANS MADE		- 0 -	- 0 -
26. REFUNDS OF CONTRIBUTIONS TO			
(a) Individuals/Persons Other Than Political Committees		- 0 -	- 0 -
(b) Political Party Committees		- 0 -	- 0 -
(c) Other Political Committees (such as PACs)		- 0 -	- 0 -
(d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c))		- 0 -	- 0 -
27. OTHER DISBURSEMENTS		- 0 -	- 0 -
28. TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d), and 27)		1,775.00	14,644.94
III. NET CONTRIBUTIONS OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans) (from Line 11(d))		100.00	100.00
30. TOTAL CONTRIBUTION REFUNDS (from Line 26(d))		- 0 -	- 0 -
31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from 29)		100.00	100.00
32. TOTAL OPERATING EXPENDITURES (from Line 19)		1,775.00	14,644.94
33. OFFSETS TO OPERATING EXPENDITURES (from Line 15)		- 0 -	- 0 -
34. NET OPERATING EXPENDITURES (subtract Line 33 from 32)		1,775.00	14,644.94

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SCHEDULE A

ITEMIZED RECEIPTS

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

PAGE 1 OF 1
FOH LINE NUMBER 16

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)

Salute America Political Action Committee C00194837

A. Full Name, Mailing Address and ZIP Code Friends of Senator D'Amato Receipt For ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Refund of Contribution Occupation Aggregate Year-to-Date > \$	Date (month, day, year) 4/1/88	Amount of Each Receipt this Period \$1,500.00
B. Full Name, Mailing Address and ZIP Code Receipt For ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
C. Full Name, Mailing Address and ZIP Code Receipt For ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
D. Full Name, Mailing Address and ZIP Code Receipt For ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
E. Full Name, Mailing Address and ZIP Code Receipt For ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
F. Full Name, Mailing Address and ZIP Code Receipt For ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
G. Full Name, Mailing Address and ZIP Code Receipt For ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period

SUBTOTAL of Receipts This Page (optional)

\$1,500.00

TOTAL This Period (last page this line number only)

\$1,500.00

80040761463

SCHEDULE B

ITEMIZED DISBURSEMENTS

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

PAGE 1 OF 1
FOR LINE NUMBER 19

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)

Salute America Political Action Committee

C00194837

A. Full Name, Mailing Address and ZIP Code Complete Business Services	Purpose of Disbursement Accounting Services Disbursement for ☐ Primary ☐ General ☐ Other (Specify):	Date (month, day, year) 4/6/87	Amount of Each Disbursement This Period \$ 250.00
B. Full Name, Mailing Address and ZIP Code Levi Rabinowitz 1747 Pennsylvania Avenue, NW Ste. 1000 Washington, D.C. 20006	Purpose of Disbursement Expenses Disbursement for ☐ Primary ☐ General ☐ Other (Specify):	Date (month, day, year) 4/26/87	Amount of Each Disbursement This Period 600.00
C. Full Name, Mailing Address and ZIP Code Levi Rabinowitz 1747 Pennsylvania Avenue, NW Ste. 1000 Washington, D.C. 20006	Purpose of Disbursement Travel Expenses Disbursement for ☐ Primary ☐ General ☐ Other (Specify):	Date (month, day, year) 5/14/87	Amount of Each Disbursement This Period 500.00
D. Full Name, Mailing Address and ZIP Code Cash	Purpose of Disbursement Petty Cash Disbursement for ☐ Primary ☐ General ☐ Other (Specify):	Date (month, day, year) 5/13/87	Amount of Each Disbursement This Period 50.00
E. Full Name, Mailing Address and ZIP Code Levi Rabinowitz 1747 Pennsylvania Avenue, NW Ste. 1000 Washington, D.C. 20006	Purpose of Disbursement Expenses Disbursement for ☐ Primary ☐ General ☐ Other (Specify):	Date (month, day, year) 5/20/87	Amount of Each Disbursement This Period 200.00
F. Full Name, Mailing Address and ZIP Code Barbara Dodrill 5602 8th Street, South Arlington, Virginia 22204	Purpose of Disbursement Secretarial Services Disbursement for ☐ Primary ☐ General ☐ Other (Specify):	Date (month, day, year) 6/12/87	Amount of Each Disbursement This Period 150.00
G. Full Name, Mailing Address and ZIP Code Cash	Purpose of Disbursement Petty Cash Disbursement for ☐ Primary ☐ General ☐ Other (Specify):	Date (month, day, year) 6/29/87	Amount of Each Disbursement This Period 25.00
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (Specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for ☐ Primary ☐ General ☐ Other (Specify):	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)

\$1,775.00

TOTAL This Period (last page this line number only)

39040761464

REPORT RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee
(Summary Page)

RECEIVED
FEDERAL ELECTION COMMISSION

88 NOV -7 AM 9:02

USE FEC MAILING LABEL
OR
TYPE OR PRINT

1. NAME OF COMMITTEE (in full) Salute America Political Action Committee		2. FEC IDENTIFICATION NUMBER C00194837
ADDRESS (number and street) ☐ Check if different than previously reported 1240 24th Street, N.W., Suite 1000		
CITY, STATE and ZIP CODE Washington, D.C. 20037		
		3. ☐ This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (date).

4. TYPE OF REPORT

(a) ☐ April 15 Quarterly Report

☐ July 15 Quarterly Report

☒ October 15 Quarterly Report

☐ January 31 Year End Report

☐ July 31 Mid Year Report (Non-election Year Only)

☐ Termination Report

Monthly Report Due On:

☐ February 20	☐ June 20	☐ October 20
☐ March 20	☐ July 20	☐ November 20
☐ April 20	☐ August 20	☐ December 20
☐ May 20	☐ September 20	☐ January 31

☐ Twelfth day report preceding _____ (Type of Election)

election on _____ in the State of _____

☐ Thirtieth day report following the General Election on _____ in the State of _____

(b) Is this Report an Amendment? ☐ YES ☐ NO

SUMMARY

5. Covering Period	COLUMN A This Period	COLUMN B Calendar Year-to-Date
July 1, 1987 through September 30, 1987		
6. (a) Cash on Hand January 1, 1987		\$ 2,777.90
(b) Cash on Hand at Beginning of Reporting Period	\$ 232.96	
(c) Total Receipts (from Line 18)	\$ - 0 -	\$ 12,100.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 232.96	\$ 14,877.90
7. Total Disbursements (from Line 28)	\$ - 0 -	\$ 14,644.94
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 232.96	\$ 232.96
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	\$	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-376-3120
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	\$ 60,000.00	

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

Type or Print Name of Treasurer
Levi Rabinowitz

Signature of Treasurer

Date

October 5, 1988

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

FEC FORM 3X

(revised 4/87)

DETAILED SUMMARY PAGE

of Receipts and Disbursements

(Page 2, FEC FORM 3X)

Name of Committee (in full) Salute America Political Action Committee		Report Covering the Period From: July 1, 1987 To September 30, 1987	
		COLUMN A Total This Period	COLUMN B Calendar Year-To-Date
I. RECEIPTS			
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees			
(i) Itemized (use Schedule A)	- 0 -	- 0 -	11(a)(i)
(ii) Unitemized	- 0 -	1,600.00	11(a)(ii)
(iii) Total of contributions from individuals	- 0 -	- 0 -	11(a)(iii)
(b) Political Party Committees	- 0 -	- 0 -	11(b)
(c) Other Political Committees (such as PACs)	- 0 -	- 0 -	11(c)
(d) TOTAL CONTRIBUTIONS (add 11(a)(iii), (b), and (c))	- 0 -	1,600.00	11(d)
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES	- 0 -		12
13. ALL LOANS RECEIVED	- 0 -	10,500.00	13
14. LOAN REPAYMENTS RECEIVED	- 0 -	- 0 -	14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	- 0 -	- 0 -	15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	- 0 -	- 0 -	16
17. OTHER RECEIPTS (Dividends, Interest, etc.)	- 0 -	- 0 -	17
18. TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)	- 0 -	12,100.00	18
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES	- 0 -		19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES	- 0 -		20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	- 0 -		21
22. INDEPENDENT EXPENDITURES (use Schedule E)	- 0 -		22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (use Schedule F)	- 0 -		23
24. LOAN REPAYMENTS MADE	- 0 -		24
25. LOANS MADE	- 0 -		25
26. REFUNDS OF CONTRIBUTIONS TO:			
(a) Individuals/Persons Other Than Political Committees	- 0 -		26(a)
(b) Political Party Committees	- 0 -		26(b)
(c) Other Political Committees (such as PACs)	- 0 -		26(c)
(d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c))	- 0 -		26(d)
27. OTHER DISBURSEMENTS	- 0 -		27
28. TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	- 0 -		28
III. NET CONTRIBUTIONS/OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans) (from Line 11(d))	- 0 -		29
30. TOTAL CONTRIBUTION REFUNDS (from Line 26(d))	- 0 -		30
31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from 29)	- 0 -		31
32. TOTAL OPERATING EXPENDITURES (from Line 19)	- 0 -		32
33. OFFSETS TO OPERATING EXPENDITURES (from Line 15)	- 0 -		33
34. NET OPERATING EXPENDITURES (subtract Line 33 from 32)	- 0 -		34

39040761466

REPORT RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee
(Summary Page)

RECEIVED
FEDERAL ELECTION COMMISSION

88 NOV -7 AM 9:02

USE FEC MAILING LABEL
OR
TYPE OR PRINT

1. NAME OF COMMITTEE (in full) Salute America Political Action Committee		2. FEC IDENTIFICATION NUMBER C00194837
ADDRESS (number and street) ☐ Check if different than previously reported 1240 24th Street, N.W., Suite 1000		
CITY, STATE and ZIP CODE Washington, D.C. 10037		
3. ☐ This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (date)		

4. TYPE OF REPORT

- (a) ☐ April 15 Quarterly Report
☐ July 15 Quarterly Report
☐ October 15 Quarterly Report
☒ January 31 Year End Report
☐ July 31 Mid Year Report (Non-election Year Only)
☐ Termination Report

Monthly Report Due On:

- ☐ February 20 ☐ June 20 ☐ October 20
☐ March 20 ☐ July 20 ☐ November 20
☐ April 20 ☐ August 20 ☐ December 20
☐ May 20 ☐ September 20 ☐ January 31

- ☐ Twelfth day report preceding _____ (Type of Election)
election on _____ in the State of _____
☐ Thirtieth day report following the General Election on _____
in the State of _____

- (b) Is this Report an Amendment? ☐ YES ☐ NO

SUMMARY

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5.	Covering Period <u>Oct. 1, 1987</u> through <u>Dec. 31, 1987</u>		
6.	(a) Cash on Hand January 1, <u>1987</u>		\$ 2,777.90
	(b) Cash on Hand at Beginning of Reporting Period	\$ 232.96	12,100.00
	(c) Total Receipts (from Line 18)	\$ - 0 -	\$ 12,100.00
	(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 232.96	\$ 14,877.90
7.	Total Disbursements (from Line 28)	\$ - 0 -	\$ 14,644.94
8.	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 232.96	\$ 232.96
9.	Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	\$	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-376-3120
10.	Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	\$ 60,000.00	
I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.			

Type or Print Name of Treasurer
Levi Rabinowitz

Signature of Treasurer

Date

October 5, 1988

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

FEC FORM 3X

(revised 4 87)

DETAILED SUMMARY PAGE

of Receipts and Disbursements
(Page 2, FEC FORM 3X)

Name of Committee (in full) Salute America Political Action Committee		Report Covering the Period From Oct. 1, 1987 To Dec. 31, 1987	
		COLUMN A Total This Period	COLUMN B Calendar Year-To-Date
I. RECEIPTS			
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees			
(i) Itemized (use Schedule A)		- 0 -	- 0 -
(ii) Unitemized		- 0 -	1,600.00
(iii) Total of contributions from individuals		- 0 -	- 0 -
(b) Political Party Committees		- 0 -	- 0 -
(c) Other Political Committees (such as PACs)		- 0 -	- 0 -
(d) TOTAL CONTRIBUTIONS (add 11(a)(iii), (b), and (c))		- 0 -	1,600.00
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES		- 0 -	- 0 -
13. ALL LOANS RECEIVED		- 0 -	10,500.00
14. LOAN REPAYMENTS RECEIVED		- 0 -	- 0 -
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)		- 0 -	- 0 -
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		- 0 -	- 0 -
17. OTHER RECEIPTS (Dividends, Interest, etc.)		- 0 -	- 0 -
18. TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)		- 0 -	12,100.00
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES		- 0 -	
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES		- 0 -	
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		- 0 -	
22. INDEPENDENT EXPENDITURES (use Schedule E)		- 0 -	
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (use Schedule F)		- 0 -	
24. LOAN REPAYMENTS MADE		- 0 -	
25. LOANS MADE		- 0 -	
26. REFUNDS OF CONTRIBUTIONS TO:			
(a) Individuals/Persons Other Than Political Committees		- 0 -	
(b) Political Party Committees		- 0 -	
(c) Other Political Committees (such as PACs)		- 0 -	
(d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c))		- 0 -	
27. OTHER DISBURSEMENTS		- 0 -	
28. TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)		- 0 -	
III. NET CONTRIBUTIONS/OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans) (from Line 11(d))		- 0 -	
30. TOTAL CONTRIBUTION REFUNDS (from Line 26(d))		- 0 -	
31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from 29)		- 0 -	
32. TOTAL OPERATING EXPENDITURES (from Line 19)		- 0 -	
33. OFFSETS TO OPERATING EXPENDITURES (from Line 15)		- 0 -	
34. NET OPERATING EXPENDITURES (subtract Line 33 from 32)		- 0 -	

89040761468

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee
(Summary Page)

RECEIVED
FEDERAL ELECTION COMMISSION

88 NOV -7 AM 9:03

USE FEC MAILING LABEL
OR
TYPE OR PRINT

1. NAME OF COMMITTEE (in full) Salute America Political Action Committee		2. FEC IDENTIFICATION NUMBER C00194837
ADDRESS (number and street) ☐ Check if different than previously reported 1240 24th Street, N.W., Suite 1000		
CITY, STATE and ZIP CODE Washington, D.C. 20037		
3. ☐ This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (date)		

4. TYPE OF REPORT

- (a) ☒ April 15 Quarterly Report
☐ July 15 Quarterly Report
☐ October 15 Quarterly Report
☐ January 31 Year End Report
☐ July 31 Mid Year Report (Non-election Year Only)
☐ Termination Report
- Monthly Report Due On:
☐ February 20 ☐ June 20 ☐ October 20
☐ March 20 ☐ July 20 ☐ November 20
☐ April 20 ☐ August 20 ☐ December 20
☐ May 20 ☐ September 20 ☐ January 31
- ☐ Twelfth day report preceding _____ (Type of Election)
election on _____ in the State of _____
- ☐ Thirtieth day report following the General Election on _____
in the State of _____
- (b) Is this Report an Amendment? ☐ YES ☐ NO

SUMMARY

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period <u>Jan. 1, 1988</u> through <u>March 31, 1988</u>		
6. (a) Cash on Hand January 1, 19 <u>88</u>		\$ 232.96
(b) Cash on Hand at Beginning of Reporting Period	\$ 232.96	
(c) Total Receipts (from Line 18)	\$ 10,500.00	\$ 10,500.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 10,732.96	\$ 10,732.96
7. Total Disbursements (from Line 28)	\$ 10,500.00	\$ 10,500.00
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 232.96	\$ 232.96
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	\$	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-376-3120
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	\$ 50,000.00	

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

Type or Print Name of Treasurer
Levi Rabinowitz

Signature of Treasurer

Date

October 5, 1988

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

FEC FORM 3X

(revised 4/87)

DETAILED SUMMARY PAGE

of Receipts and Disbursements

(Page 2, FEC FORM 3X)

Name of Committee (in full) Salute America Political Action Committee		Report Covering the Period From: Jan. 1, 1988 to March 31, 1988	
		COLUMN A Total This Period	COLUMN B Calendar Year-To-Date
I. RECEIPTS			
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees			
(i) Itemized (use Schedule A)		10,500.00	10,500.00
(ii) Unitemized		- 0 -	- 0 -
(iii) Total of contributions from individuals		10,500.00	10,500.00
(b) Political Party Committees		- 0 -	- 0 -
(c) Other Political Committees (such as PACs)		- 0 -	- 0 -
(d) TOTAL CONTRIBUTIONS (add 11(a)(iii), (b), and (c))		10,500.00	10,500.00
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES		- 0 -	- 0 -
13. ALL LOANS RECEIVED		- 0 -	- 0 -
14. LOAN REPAYMENTS RECEIVED		- 0 -	- 0 -
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)		- 0 -	- 0 -
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		- 0 -	- 0 -
17. OTHER RECEIPTS (Dividends, Interest, etc.)		- 0 -	- 0 -
18. TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)		10,500.00	10,500.00
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES		500.00	500.00
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES		- 0 -	- 0 -
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		- 0 -	- 0 -
22. INDEPENDENT EXPENDITURES (use Schedule E)		- 0 -	- 0 -
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (use Schedule F)		- 0 -	- 0 -
24. LOAN REPAYMENTS MADE		10,000.00	10,000.00
25. LOANS MADE		- 0 -	- 0 -
26. REFUNDS OF CONTRIBUTIONS TO:			
(a) Individuals/Persons Other Than Political Committees		- 0 -	- 0 -
(b) Political Party Committees		- 0 -	- 0 -
(c) Other Political Committees (such as PACs)		- 0 -	- 0 -
(d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c))		- 0 -	- 0 -
27. OTHER DISBURSEMENTS		- 0 -	- 0 -
28. TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)		10,500.00	10,500.00
III. NET CONTRIBUTIONS/OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans) (from Line 11(d))		10,500.00	
30. TOTAL CONTRIBUTION REFUNDS (from Line 26(d))			
31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from 29)			
32. TOTAL OPERATING EXPENDITURES (from Line 19)		500.00	500.00
33. OFFSETS TO OPERATING EXPENDITURES (from Line 15)		- 0 -	- 0 -
34. NET OPERATING EXPENDITURES (subtract Line 33 from 32)		500.00	500.00

89040761470

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)

Salute America Political Action Committee

A. Full Name, Mailing Address and ZIP Code
Helen Hackel

Name of Employer

Date (month,
day, year)Amount of Each
Receipt this Period

Occupation

2/16/88

5,000.00

Receipt For:

☐ Primary☐ General☐ Other (specify):

Aggregate Year-to-Date > \$ 5,000.00

B. Full Name, Mailing Address and ZIP Code

Morris Tolansky

Name of Employer

Date (month,
day, year)Amount of Each
Receipt this Period

Occupation

2/12/88

5,000.00

Receipt For:

☐ Primary☐ General☐ Other (specify):

Aggregate Year-to-Date > \$ 5,000.00

C. Full Name, Mailing Address and ZIP Code

Jack Bendheim

Name of Employer

Date (month,
day, year)Amount of Each
Receipt this Period

Occupation

2/4/88

500.00

Receipt For:

☐ Primary☐ General☐ Other (specify):

Aggregate Year-to-Date > \$

D. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,
day, year)Amount of Each
Receipt this Period

Occupation

Receipt For:

☐ Primary☐ General☐ Other (specify):

Aggregate Year-to-Date > \$

E. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,
day, year)Amount of Each
Receipt this Period

Occupation

Receipt For:

☐ Primary☐ General☐ Other (specify):

Aggregate Year-to-Date > \$

F. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,
day, year)Amount of Each
Receipt this Period

Occupation

Receipt For:

☐ Primary☐ General☐ Other (specify):

Aggregate Year-to-Date > \$

G. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,
day, year)Amount of Each
Receipt this Period

Occupation

Receipt For:

☐ Primary☐ General☐ Other (specify):

Aggregate Year-to-Date > \$

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only)

10,500.00

89040761471

SCHEDULE B

ITEMIZED DISBURSEMENTS

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

PAGE 1 OF 1
FOR LINE NUMBER 19

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)

Salute America Political Action Committee

A. Full Name, Mailing Address and ZIP Code Martin Mendelsohn, Esquire 1700 K Street, N.W., Ste. 1100 Washington, D.C. 20006	Purpose of Disbursement Legal Fees Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 2/23/88	Amount of Each Disbursement This Period 500.00
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)

500.00

89040761472

SCHEDULE B

ITEMIZED DISBURSEMENTS

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

PAGE 1	OF 1
FOR LINE NUMBER 24	

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)

Salute America Political Action Committee

A. Full Name, Mailing Address and ZIP Code Sidney Olson 5700 Collins Ave, Apt. 142 Miami Beach, FL 33140	Purpose of Disbursement Loan Repayment Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 2/26/88	Amount of Each Disbursement This Period 5,000.00
B. Full Name, Mailing Address and ZIP Code Miriam Olson 5700 Collins Ave., Apt. 142 Miami Beach, FL 33140	Purpose of Disbursement Loan Repayment Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 2/26/88	Amount of Each Disbursement This Period 5,000.00
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)

10,000.00

89040761473

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee
(Summary Page)

RECEIVED
FEDERAL ELECTION COMMISSION

88 NOV -7 AM 9:03

USE FEC MAILING LABEL
OR
TYPE OR PRINT

1 NAME OF COMMITTEE (in full) Salute America Political Action Committee		2 FEC IDENTIFICATION NUMBER C00194837
ADDRESS (number and street) ☐ Check if different than previously reported 1240 24th Street, N.W., Suite 1000		3 ☐ This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (date).
CITY, STATE and ZIP CODE Washington, D.C. 20037		

4. TYPE OF REPORT

- (a) ☐ April 15 Quarterly Report
☒ July 15 Quarterly Report
☐ October 15 Quarterly Report
☐ January 31 Year End Report
☐ July 31 Mid Year Report (Non-election Year Only)

Monthly Report Due On:

- | | | |
|--------------------------------------|---------------------------------------|--------------------------------------|
| ☐ February 20 | ☐ June 20 | ☐ October 20 |
| ☐ March 20 | ☐ July 20 | ☐ November 20 |
| ☐ April 20 | ☐ August 20 | ☐ December 20 |
| ☐ May 20 | ☐ September 20 | ☐ January 31 |

☐ Twelfth day report preceding _____ (Type of Election)

election on _____ in the State of _____

☐ Thirtieth day report following the General Election on _____ in the State of _____

☐ Termination Report

(b) Is this Report an Amendment? ☐ YES ☐ NO

SUMMARY

5. Covering Period	COLUMN A This Period	COLUMN B Calendar Year-to-Date
<u>April 1, 1988</u> through <u>June 30, 1988</u>		
6. (a) Cash on Hand January 1 19____		\$ 232.96
(b) Cash on Hand at Beginning of Reporting Period	\$ 232.96	
(c) Total Receipts (from Line 18)	\$ 1,100.00	\$ 11,600.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 1,332.96	\$ 11,832.96
7. Total Disbursements (from Line 28)	\$ 1,150.00	\$ 11,650.00
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 182.96	\$ 182.96
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	\$	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-376-3120
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	\$ 50,000.00	

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

Type or Print Name of Treasurer

Signature of Treasurer

Date

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

FEC FORM 3X

(revised 4/87)

DETAILED SUMMARY PAGE

of Receipts and Disbursements
(Page 2, FEC FORM 3X)

Name of Committee (in full)	Report Covering the Period From: April 1, 1988 to June 30, 1988	
Salute America Political Action Committee		
I. RECEIPTS	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date
11. CONTRIBUTIONS (other than loans) FROM:		
(a) Individuals/Persons Other Than Political Committees		
(i) Itemized (use Schedule A)	1,000.00	11,500.00
(ii) Unitemized	100.00	100.00
(iii) Total of contributions from individuals	1,100.00	11,600.00
(b) Political Party Committees	- 0 -	- 0 -
(c) Other Political Committees (such as PACs)	- 0 -	- 0 -
(d) TOTAL CONTRIBUTIONS (add 11(a)(iii), (b), and (c))	1,100.00	11,600.00
12. TRANSFERS FROM AFFILIATED OTHER PARTY COMMITTEES	- 0 -	
13. ALL LOANS RECEIVED		
14. LOAN REPAYMENTS RECEIVED	- 0 -	
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	- 0 -	
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	- 0 -	
17. OTHER RECEIPTS (Dividends, Interest, etc.)	- 0 -	
18. TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)	1,100.00	11,600.00
II. DISBURSEMENTS		
19. OPERATING EXPENDITURES	450.00	950.00
20. TRANSFERS TO AFFILIATED OTHER PARTY COMMITTEES	- 0 -	- 0 -
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	700.00	700.00
22. INDEPENDENT EXPENDITURES (use Schedule E)	- 0 -	- 0 -
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (use Schedule F)	- 0 -	- 0 -
24. LOAN REPAYMENTS MADE	- 0 -	- 0 -
25. LOANS MADE	- 0 -	- 0 -
26. REFUNDS OF CONTRIBUTIONS TO:		
(a) Individuals/Persons Other Than Political Committees	- 0 -	- 0 -
(b) Political Party Committees	- 0 -	- 0 -
(c) Other Political Committees (such as PACs)	- 0 -	- 0 -
(d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c))	- 0 -	- 0 -
27. OTHER DISBURSEMENTS	- 0 -	- 0 -
28. TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	1,150.00	11,650.00
III. NET CONTRIBUTIONS OPERATING EXPENDITURES		
29. TOTAL CONTRIBUTIONS (other than loans) (from Line 11(d))	1,100.00	
30. TOTAL CONTRIBUTION REFUNDS (from Line 26(d))	- 0 -	
31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from 29)	1,100.00	
32. TOTAL OPERATING EXPENDITURES (from Line 19)	450.00	
33. OFFSETS TO OPERATING EXPENDITURES (from Line 15)	- 0 -	
34. NET OPERATING EXPENDITURES (subtract Line 33 from 32)	450.00	

69040761475

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)

Salute America Political Action Committee

A. Full Name, Mailing Address and ZIP Code Isaac Rokowsky 32 West Maple Avenue Monsey, New York 10952	Name of Employer Self	Date (month, day, year) 5/6/88	Amount of Each Receipt this Period 1,000.00
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date > \$ 1,000.00		
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date > \$		
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date > \$		
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date > \$		
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date > \$		
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date > \$		
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date > \$		

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only)

1,000.00

89040761475

SCHEDULE B

ITEMIZED DISBURSEMENTS

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

PAGE 1 OF 1
FOR LINE NUMBER 19

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)

Salute America Political Action Committee

A. Full Name, Mailing Address and ZIP Code Levi Rabinowitz 1240 24th St., N.W. Washington, D.C. 20037	Purpose of Disbursement Expense Reimbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 5/5/88	Amount of Each Disbursement This Period 100.00
B. Full Name, Mailing Address and ZIP Code Martin Mendelsohn Suite 1100 1700 K Street, N.W. Washington, D.C. 20006	Purpose of Disbursement Legal Fees Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 6/15/88	Amount of Each Disbursement This Period 250.00
C. Full Name, Mailing Address and ZIP Code Martin Mendelsohn Suite 1100 1700 K Street, N.W. Washington, D.C. 20006	Purpose of Disbursement Legal Fees Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 6/20/88	Amount of Each Disbursement This Period 100.00
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only)

89040701471

SCHEDULE B

ITEMIZED DISBURSEMENTS

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

PAGE 1 OF 1
FOR LINE NUMBER 21

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)

Salute America Political Action Committee

A. Full Name, Mailing Address and ZIP Code Licht for Senate Providence, Rhode Island	Purpose of Disbursement Senate, Rhode Island Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 6/10/00	Amount of Each Disbursement This Period 500.00
B. Full Name, Mailing Address and ZIP Code Friends of Vin Weber P.O. Box 1690 Wilmar, NM 56201	Purpose of Disbursement House, Minnesota Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 6/10/88	Amount of Each Disbursement This Period 200.00
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)

700.00

89040761478

For Other Than An Authorized Committee
(Summary Page)

RECEIVED
FEDERAL ELECTION COMMISSION

USE FEC MAILING LABEL
OR
TYPE OR PRINT

1. NAME OF COMMITTEE (in full) Salute America Political Action Committee		2. 88 NOV 7 AM 9:03 FEC IDENTIFICATION NUMBER C00194837	
ADDRESS (number and street) ☐ Check if different than previously reported 1240 24th Street, N.W., Suite 1100			
CITY, STATE and ZIP CODE Washington, D.C. 20037		3. ☐ This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (date)	

4. TYPE OF REPORT

- (a) ☐ April 15 Quarterly Report
☐ July 15 Quarterly Report
☒ October 15 Quarterly Report
☐ January 31 Year End Report
☐ July 31 Mid Year Report (Non-election Year Only)
☐ Termination Report
- Monthly Report Due On
☐ February 20 ☐ June 20 ☐ October 20
☐ March 20 ☐ July 20 ☐ November 20
☐ April 20 ☐ August 20 ☐ December 20
☐ May 20 ☐ September 20 ☐ January 31
- ☐ Twelfth day report preceding _____ (Type of Election)
election on _____ in the State of _____
- ☐ Thirtieth day report following the General Election on _____
in the State of _____

(b) Is this Report an Amendment? ☐ YES ☐ NO

SUMMARY

5	Covering Period <u>July 1, 1988</u> through <u>September 30, 1988</u>	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6	(a) Cash on Hand January 1, 19 <u>88</u>		\$ 232.96
	(b) Cash on Hand at Beginning of Reporting Period	\$ 182.96	
	(c) Total Receipts (from Line 18)	\$ - 0 -	\$ 11,749.88
	(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 332.84	\$ 11,982.84
7	Total Disbursements (from Line 28)	\$ 200.00	\$ 11,850.00
8	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 132.84	\$ 132.84
9	Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	\$	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-376-3120
10	Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	\$ 50,000.00	

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

Type or Print Name of Treasurer

Signature of Treasurer

Date

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

FEC FORM 3X
(revised 4-87)

DETAILED SUMMARY PAGE

of Receipts and Disbursements
(Page 2 FEC FORM 3X)

Name of Committee (in full):
Salute America Political Action Committee

Report Covering the Period
From July 1, 1988 to September 30, 1988

		COLUMN A Total This Period	COLUMN B Calendar Year-To-Date	
I. RECEIPTS				
11. CONTRIBUTIONS (other than loans) FROM:				
(a) Individuals/Persons Other Than Political Committees				
(i) Itemized (use Schedule A)	- 0 -			11(a)(i)
(ii) Unitemized	- 0 -			11(a)(ii)
(iii) Total of contributions from individuals	- 0 -			11(a)(iii)
(b) Political Party Committees	- 0 -			11(b)
(c) Other Political Committees (such as PACs)	- 0 -			11(c)
(d) TOTAL CONTRIBUTIONS (add 11(a)(iii), (b), and (c))	- 0 -		11,600.00	11(d)
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES	- 0 -		- 0 -	12
13. ALL LOANS RECEIVED	- 0 -		- 0 -	13
14. LOAN REPAYMENTS RECEIVED	- 0 -		- 0 -	14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	- 0 -		- 0 -	15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	200.00		200.00	16
17. OTHER RECEIPTS (Dividends, Interest, etc.)	- 0 -			17
18. TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)	200.00		11,800.00	18
II. DISBURSEMENTS				
19. OPERATING EXPENDITURES	200.00		1,150.00	19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES	- 0 -		- 0 -	20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	- 0 -		700.00	21
22. INDEPENDENT EXPENDITURES (use Schedule E)	- 0 -		- 0 -	22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (use Schedule F)	- 0 -		- 0 -	23
24. LOAN REPAYMENTS MADE	- 0 -		10,000.00	24
25. LOANS MADE	- 0 -		- 0 -	25
26. REFUNDS OF CONTRIBUTIONS TO				
(a) Individuals/Persons Other Than Political Committees	- 0 -			26(a)
(b) Political Party Committees	- 0 -			26(b)
(c) Other Political Committees (such as PACs)	- 0 -			26(c)
(d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c))	- 0 -			26(d)
27. OTHER DISBURSEMENTS	- 0 -			27
28. TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	200.00		11,850.00	28
III. NET CONTRIBUTIONS OPERATING EXPENDITURES				
29. TOTAL CONTRIBUTIONS (other than loans) (from Line 11(d))	- 0 -			29
30. TOTAL CONTRIBUTION REFUNDS (from Line 26(d))	- 0 -			30
31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from 29)	- 0 -			31
32. TOTAL OPERATING EXPENDITURES (from Line 19)	200.00		1,150.00	32
33. OFFSETS TO OPERATING EXPENDITURES (from Line 15)	- 0 -		- 0 -	33
34. NET OPERATING EXPENDITURES (subtract Line 33 from 32)	200.00		1,150.00	34

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SCHEDULE A

ITEMIZED RECEIPTS

Separate schedulers
each category of the
Detailed Summary Page

PAGE 1 OF 1
FOR LINE NUMBER 16

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)

Salute America Political Action Committee

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Friends of Vin Weber P.O. Box 1690 Wilmar, MN 56201	Return of Contribution	7/20/88	200.00
Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Occupation	Aggregate Year-to-Date > \$	
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Occupation	Aggregate Year-to-Date > \$	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Occupation	Aggregate Year-to-Date > \$	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Occupation	Aggregate Year-to-Date > \$	
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Occupation	Aggregate Year-to-Date > \$	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Occupation	Aggregate Year-to-Date > \$	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify)	Occupation	Aggregate Year-to-Date > \$	

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only)

200.00

39040761431

SCHEDULE B

ITEMIZED DISBURSEMENTS

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

PAGE 1 OF 1
FOR LINE NUMBER 19

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)

Salute America Political Action Committee

A. Full Name, Mailing Address and ZIP Code Levi Rabinowitz 1240 24th Street, N.W. Washington, D.C. 20037	Purpose of Disbursement Expense Reimbursement Disbursement for: ☐ Primary ☐ General ☐ Other (specify)	Date (month, day, year) 7/20/88	Amount of Each Disbursement This Period 200.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	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)

200.00

39040761432

LAW OFFICES
MARTIN MENDELSON
SUITE 1100
1700 K STREET, N.W.
WASHINGTON, D. C. 20006
(202) 833-1893

6CC#1457
RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

88 DEC 27 AM 10:08

Mon 2689

December 22, 1988

3 2 5 1 9 2 0 5 0 6 8
Patty Riley, Esquire
Office of the General Counsel
Federal Elections Commissions
999 E Street, N.W.
Washington, D.C. 20463

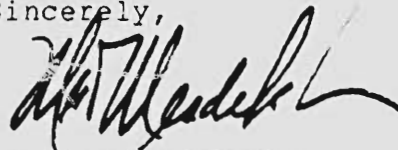
Re: Salute America Political Action Committee

Dear Ms. Riley:

Enclosed is the Affidavit of Mr. Levi Rabinowitz and supporting documents in response to the outstanding interrogatories in this case. Please let me know if you need any further information.

Thank you for your continued cooperation in this case.

Sincerely,



Martin Mendelsohn

MM:jph

Enclosures

88 DEC 27 PM 2:22

AFFIDAVIT

I, Levi Rabinowitz, being first duly sworn depose and say as follows:

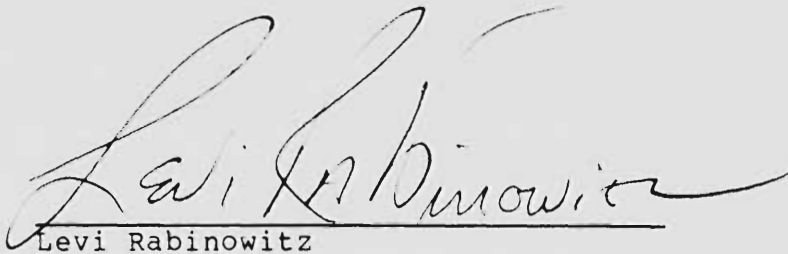
1. I am the Treasurer of the Salute America Political Action Committee and furnish this Affidavit in response to the interrogatories filed by the Federal Elections Commission.

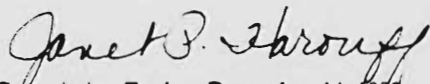
2. The FEC's first question is whether the loans made in 1986 were loans or debts. In response, I say that these loans were made to the Committee in the fall of 1986 and are Schedule C "debts" currently owed to each of the named individuals on the attached list. Each loan was for \$5,000.00.

3. The loans do not have terms in that they do not fall on a specific due date. There is no interest to be paid, no security has been made for the loans, and except for repayments to Mr. Sidney Olson of \$5,000.00 on February 26, 1988 and to Mrs. Miriam Olson of \$5,000.00 on February 26, 1988 no payments have been made on any of these loans. The reason no payments have been made, is that Salute America PAC is without any funds to repay the loans.

4. The documents related to Question 1 are enclosed. The 1987 year-end report has previously been filed.

Subscribed and sworn to before me this 20 day of December, 1988.


Levi Rabinowitz


My Commission Expires December 14, 1992

LOANS

LINE NUMBER 131
(Use separate schedules
for each numbered line)

Name of Committee (in Full) Salute America Political Action Committee			
A. Full Name, Mailing Address and ZIP Code of Loan Source Sandi Quinn 31 Gateway Drive Great Nech, NY 11021	Original Amount of Loan 5,000.00	Cumulative Payment To Date -	Balance Outstanding at Close of This Period 5,000.00
Election: ☐ Primary ☐ General ☐ Other (specify):			
Terms: Date Incurred _____ Date Due _____ Interest Rate _____ % (apr) ☐ Secured			
List All Endorsers or Guarantors (if any) to Item A			
1. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding: \$		
2. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding: \$		
3. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding: \$		
B. Full Name, Mailing Address and ZIP Code of Loan Source Saul Quinn 31 Gateway Drive Great Nech, NY 11021			
Original Amount of Loan 5,000.00		Cumulative Payment To Date -	
Balance Outstanding at Close of This Period 5,000.00			
Election: ☐ Primary ☐ General ☐ Other (specify):			
Terms: Date Incurred _____ Date Due _____ Interest Rate _____ % (apr) ☐ Secured			
List All Endorsers or Guarantors (if any) to Item B			
1. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding: \$		
2. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding: \$		
3. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding: \$		
SUBTOTALS This Period This Page (optional)			
TOTALS This Period (last page in this line only)			
Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.			

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LOANS

LINE NUMBER 1
(Use separate schedules
for each numbered line)

Name of Committee (in Full)

Salute America Political Action Committee

A. Full Name, Mailing Address and ZIP Code of Loan Source

Els Bendheim
4680 Livingston Avenue
Riverdale, NY 10471

Original Amount
of Loan

5,000.00

Cumulative Payment
To Date

-

Balance Outstanding at
Close of This Period

5,000.00

Election: ☐ Primary ☐ General ☐ Other (specify):

Terms: Date Incurred _____ Date Due _____ Interest Rate _____ % (apr) ☐ Secured

List All Endorsers or Guarantors (if any) to Item A

1. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding:
\$

2. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding:
\$

3. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding:
\$

B. Full Name, Mailing Address and ZIP Code of Loan Source

Charles Bendheim
4680 Livingston Avenue
Riverdale, NY 10471

Original Amount
of Loan

5,000.00

Cumulative Payment
To Date

-

Balance Outstanding at
Close of This Period

5,000.00

Election: ☐ Primary ☐ General ☐ Other (specify):

Terms: Date Incurred _____ Date Due _____ Interest Rate _____ % (apr) ☐ Secured

List All Endorsers or Guarantors (if any) to Item B

1. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding:
\$

2. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding:
\$

3. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding:
\$

SUBTOTALS This Period This Page (optional)

TOTALS This Period (last page in this line only)

Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.

89040761436

LOANS

Name of Committee (in Full) Salute America Political Action Committee				
A. Full Name, Mailing Address and ZIP Code of Loan Source Randie Lowenthal 617 West End Avenue New York, NY 10024		Original Amount of Loan 5,000.00	Cumulative Payment To Date -	Balance Outstanding at Close of This Period 5,000.00
Election: ☐ Primary ☐ General ☐ Other (specify):				
Terms: Date Incurred _____ Date Due _____ Interest Rate _____ % (apr) ☐ Secured				
List All Endorsers or Guarantors (if any) to Item A				
1. Full Name, Mailing Address and ZIP Code		Name of Employer		
		Occupation		
		Amount Guaranteed Outstanding: \$		
2. Full Name, Mailing Address and ZIP Code		Name of Employer		
		Occupation		
		Amount Guaranteed Outstanding: \$		
3. Full Name, Mailing Address and ZIP Code		Name of Employer		
		Occupation		
		Amount Guaranteed Outstanding: \$		
B. Full Name, Mailing Address and ZIP Code of Loan Source Walter Lowenthal 617 West End Avenue New York, NY 10024		Original Amount of Loan 5,000.00	Cumulative Payment To Date -	Balance Outstanding at Close of This Period 5,000.00
Election: ☐ Primary ☐ General ☐ Other (specify):				
Terms: Date Incurred _____ Date Due _____ Interest Rate _____ % (apr) ☐ Secured				
List All Endorsers or Guarantors (if any) to Item B				
1. Full Name, Mailing Address and ZIP Code		Name of Employer		
		Occupation		
		Amount Guaranteed Outstanding: \$		
2. Full Name, Mailing Address and ZIP Code		Name of Employer		
		Occupation		
		Amount Guaranteed Outstanding: \$		
3. Full Name, Mailing Address and ZIP Code		Name of Employer		
		Occupation		
		Amount Guaranteed Outstanding: \$		
SUBTOTALS This Period This Page (optional)				
TOTALS This Period (last page in this line only)				
Carry outstanding balances only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.				

39040761437

Name of Committee (in Full) Salute America Political Action Committee			
A. Full Name, Mailing Address and ZIP Code of Loan Source Erica Jerselson 4485 Fieldston Road Riverdale, NY 10471		Original Amount of Loan 5,000.00	Cumulative Payment To Date -
		Balance Outstanding at Close of This Period 5,000.00	
Election: ☐ Primary ☐ General ☐ Other (specify):			
Terms: Date Incurred _____ Date Due _____ Interest Rate _____ % (apr) ☐ Secured			
List All Endorsers or Guarantors (if any) to Item A			
1. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding: \$	
2. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding: \$	
3. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding: \$	
B. Full Name, Mailing Address and ZIP Code of Loan Source Ludwig Jerselson 4485 Fieldston Road Riverdale, NY 10471		Original Amount of Loan 5,000.00	Cumulative Payment To Date -
		Balance Outstanding at Close of This Period 5,000.00	
Election: ☐ Primary ☐ General ☐ Other (specify):			
Terms: Date Incurred _____ Date Due _____ Interest Rate _____ % (apr) ☐ Secured			
List All Endorsers or Guarantors (if any) to Item B			
1. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding: \$	
2. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding: \$	
3. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding: \$	
SUBTOTALS This Period This Page (optional)			
TOTALS This Period (last page in this line only)			
Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.			

89040761483

Name of Committee (in Full)

Salute America Political Action Committee

A. Full Name, Mailing Address and ZIP Code of Loan Source

Anita Beretz
280 Park Avenue
New York, New York 10017

Original Amount
of Loan

5,000.00

Cumulative Payment
To Date

-

Balance Outstanding at
Close of This Period

5,000.00

Election: ☐ Primary ☐ General ☐ Other (specify):

Terms: Date Incurred _____

Date Due _____

Interest Rate _____ % (apr)

☐ Secured

List All Endorsers or Guarantors (if any) to Item A

1. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding:
\$

2. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding:
\$

3. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding:
\$

B. Full Name, Mailing Address and ZIP Code of Loan Source

Hal Beretz
280 Park Avenue
New York, NY 10017

Original Amount
of Loan

5,000.00

Cumulative Payment
To Date

-

Balance Outstanding at
Close of This Period

5,000.00

Election: ☐ Primary ☐ General ☐ Other (specify):

Terms: Date Incurred _____

Date Due _____

Interest Rate _____ % (apr)

☐ Secured

List All Endorsers or Guarantors (if any) to Item B

1. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding:
\$

2. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding:
\$

3. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding:
\$

SUBTOTALS This Period This Page (optional)

TOTALS This Period (last page in this line only)

Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.

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BEFORE THE FEDERAL ELECTION COMMISSION

89 FEB 22 PM 3:22

In the Matter of)
 Salute America Political Action) MUR 2689
 Committee and Levi Rabinowitz,)
 as treasurer)
 Friends of Vin Weber and Robert A.)
 Kovell, as treasurer)

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

This matter arose pursuant to a complaint (MUR 2526) filed by Robert Bauer, counsel for the Democratic Congressional Campaign Committee against Salute America Political Action Committee ("Salute America") and the Friends of Vin Weber and Robert A. Kovell, as treasurer.^{1/} The complaint alleged that these two committees are affiliated political committees that had failed to satisfy the Act's registration requirements. The basis of this allegation was purported conduit activity between the two committees. Additionally, this matter includes several referrals of Salute America from the Reports Analysis Division ("RAD").^{2/}

II. STATUS OF THE INVESTIGATION OF SALUTE AMERICA

On April 5, 1988, the Commission opened a MUR as to RAD Referral 88L-3 (MUR 2597), found reason to believe Salute America violated 2 U.S.C. § 434(a)(4) by failing to file timely its 1985 Year End and 1986 April, July and October Quarterly Reports, and

^{1/} The status of the Friends of Vin Weber and its possible affiliation with Salute America is discussed at Section IV of this report.

^{2/} See RAD Referrals 88L-3, 88NF-11, 88NF-35. Most recently the Commission determined to open a MUR as to RAD Referral 88NF-43 (MUR 2769), but did not merge the other matters with this referral in order to avoid further delay in resolving Salute America's late filings.

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merged that matter with MUR 2526, the complaint generated matter. Also on this date the Commission approved a subpoena to produce documents requiring the Committee to file all reports for the reporting periods between October 1, 1986 and December 31, 1986. On May 19, 1988, respondents produced materials responsive to this subpoena.

On June 7, 1988, the Commission determined to open a MUR as to RAD Referral 88NF-11 (MUR 2630) and found reason to believe Salute America violated 2 U.S.C. § 434(a)(4)(A)(iv) by failing to timely file its 1987 Year End Report. The Commission further determined to merge MUR 2597 with MUR 2630.

On July 7, 1988, the Commission considered Salute America's request for pre-probable cause conciliation and determined not to grant it. Also on this date, the Commission further determined that there was reason to believe Salute America violated 2 U.S.C. §§ 441a(a)(1)(A), 441a(f) and 434(b), as well as 11 C.F.R. § 104.11(a). The Commission also approved a subpoena that requested information regarding obligations listed on Salute America's reports, as well as requested Salute America's 1987 Year End Report. (Attachment 1). Respondents submitted a two page letter in partial response to this subpoena on August 4, 1988. (Attachment 2).

On September 7, 1988, the Commission determined to open a MUR as to RAD Referral 88NF-35 (MUR 2689) and found reason to believe Salute America violated 2 U.S.C. §§ 434(a)(4)(A)(i) and (iv) by failing to file timely its 1987 Mid Year and 1988 April

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Quarterly Reports. The Commission merged MUR 2630 with MUR 2689. Also on that date the Commission approved a subpoena for documents requiring Salute America to produce its 1987 Year End Report and its 1988 April Quarterly Report. (Attachment 3). On November 7, 1988, Salute America submitted these reports. Additionally, on December 22, 1988, Salute America finally completed its response to the Commission's July 7, 1988 subpoena. (Attachment 4). Because Salute America has provided all requested information, this Office recommends that the Commission grant Salute America's outstanding request to enter into conciliation prior to a finding of probable cause to believe.

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

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IV. STATUS OF INVESTIGATION REGARDING THE FRIENDS OF VIN WEBER

As previously noted, the complaint in this matter asserted that Salute America and Friends of Vin Weber, an authorized committee, were affiliated. The complaint alleged that Salute America was acting as a conduit for contributions to the Friends of Vin Weber, but presented no evidence to support this allegation. The General Counsel's Report dated March 28, 1988, recommended that there was reason to believe that the two committees were affiliated, based upon the Friends of Vin Weber's November, 1986 correspondence to the Commission stating that the Candidate had "not been officially affiliated with [Salute America] since May, 1985," and asked that his name be "removed from the informal list of candidate PAC's." Friends of Vin Weber Response to Complaint at 5. (Attachment 5)^{1/} The Commission

^{1/} The responses to the complaint were inconsistent regarding the initial relationship of the committees. Friends of Vin Weber stated that Vin Weber has not been affiliated with Salute America since 1985; Salute America denied any initial affiliation. This discrepancy may be explained by the fact that the current treasurer re-activated Salute America and apparently was unaware of its prior relationship with the candidate.

determined, however, that no action should be taken at this time regarding possible violations of 2 U.S.C. § 433 pending the receipt of Salute America's required reports.^{8/}

Pursuant to 2 U.S.C. § 441a(a)(1)(A), political committees that are not multicandidate committees are limited to contributing \$1,000 per election to an authorized committee of a candidate. Committees are prohibited from accepting contributions exceeding the Act's limitations. 2 U.S.C.

§ 441a(f). Affiliated political committees may transfer funds between themselves without limitation. 2 U.S.C. § 441a(a)(4) and 11 C.F.R. § 102.6(a)(1). The Act subjects affiliated political committees to a common contribution limitation. 2 U.S.C.

§ 441a(a)(5). Affiliated committees are defined as committees established, financed, maintained or controlled by the same person or group of persons. Id. Indicia of affiliation include similar patterns of contributions and the transfer of funds between committees that represent a substantial portion of the funds of the transferor or the transferee committee. 11 C.F.R. § 100.5(g)(2)(ii)(D) and (E). Political committees must

^{8/} Because Salute America had not filed its reports, it could not be determined whether it had qualified as a multicandidate committee. If Salute America were a multicandidate committee, the two committees' relationship would be analyzed pursuant to MURs 950, 1741, and 2161, subjecting multicandidate committees purporting to be "affiliated" with authorized committees to the Act's \$5,000 contribution limitation at 2 U.S.C. § 441a(a). Conversely, if not a multicandidate committee, an affiliation analysis is appropriate to determine whether the two committees are within the definition of affiliated committees, and thus able to transfer funds to each other without limitation. See MUR 2083. It appears that Salute America achieved multicandidate status on its 1988 April Quarterly Report.

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list any affiliated committees on their Statements of Organization. 2 U.S.C. § 433.

At this juncture, based upon the reports of both respondents filed to date, there is no further evidence of affiliation or indicia of affiliation. The two committees appear to operate independently of each other. Similar patterns of contributions are not apparent. In fact, the only evidence of interaction between the two are Salute America's two contributions to the Friends of Vin Weber, one for \$5,000 which was refunded, and a second for \$200 in June, 1988. Moreover, the complaint in this matter based its affiliation allegation on suspected conduit activity between the two committees, while the reports reveal no evidence of such conduit activity. Therefore, in the absence of any additional probative evidence indicating the two committees might be affiliated, this Office recommends that the Commission find no reason to believe the Friends of Vin Weber and Robert A. Kovell, as treasurer, and Salute America PAC and Levi Rabinowitz, as treasurer, violated 2 U.S.C. § 433. This Office further recommends that the Commission close the file as to the Friends of Vin Weber and Robert A. Kovell, as treasurer.

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V. RECOMMENDATIONS

1. Find no reason to believe the Friends of Vin Weber and Robert A. Kovell, as treasurer, violated 2 U.S.C. § 433 and close the file as to these respondents.
2. Find no reason to believe Salute America PAC and Levi Rabinowitz, as treasurer, violated 2 U.S.C. § 433.
3. Enter into conciliation prior to a finding of probable cause to believe with Salute America PAC and Levi Rabinowitz, as treasurer.
4. Approve the attached conciliation agreement and letters.

Lawrence M. Noble
General Counsel

89040761500
Date 2/22/89

BY:

Lois G. Lerner
Lois G. Lerner
Associate General Counsel

Attachments

1. July 7, 1988 Subpoena
2. August 4, 1988 Response
3. September 7, 1988 Subpoena
4. December 22, 1988 Response
5. Friends of Vin Weber's Response
6. Proposed Conciliation Agreement
7. Proposed Letters (2)

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Salute America Political Action) MUR 2689
Committee and Levi Rabinowitz,)
as treasurer)
Friends of Vin Weber and Robert A.)
Kovell, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on February 27, 1989, the Commission decided by a vote of 6-0 to take the following actions in MUR 2689:

1. Find no reason to believe the Friends of Vin Weber and Robert A. Kovell, as treasurer, violated 2 U.S.C. § 433 and close the file as to these respondents.
2. Find no reason to believe Salute America PAC and Levi Rabinowitz, as treasurer, violated 2 U.S.C. § 433.
3. Enter into conciliation prior to a finding of probable cause to believe with Salute America PAC and Levi Rabinowitz, as treasurer, as recommended in the General Counsel's report signed February 22, 1989.

(Continued)

89040761504

Federal Election Commission
Certification for MUR 2689
February 27, 1989

Page 2

4. Approve the conciliation agreement and letters, as recommended in the General Counsel's report signed February 22, 1989.

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

Attest:

2/27/89

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in the Office of Commission Secretary: Wed., 2-22-89, 3:17
Circulated on 48 hour tally basis: Thurs., 2-23-89, 11:00
Deadline for vote: Mon., 2-27-89, 11:00

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 3, 1989

Robert A. Kovell, Treasurer
Friends of Vin Weber
Box 848
New Ulm MN 56073

RE: MUR 2689 (formerly
MUR 2526)
Friends of Vin Weber and
Robert A. Kovell, as
treasurer

Dear Mr. Kovell:

On August 12, 1987, the Federal Election Commission notified the Friends of Vin Weber ("Committee") and you, as treasurer, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

On February 27, 1989, the Commission found on the basis of the information in the complaint that there is no reason to believe the Committee and you, as treasurer, violated 2 U.S.C. § 433. Accordingly, the Commission closed its file in this matter as it pertains to the Committee and you, as treasurer.

This matter will become a part of the public record within 30 days after the file has been closed with respect to all respondents. If you wish to submit any materials to appear on the public record, please do so within ten days. Please send such materials to the Office of the General Counsel.

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

Sincerely,

Lawrence M. Noble
General Counsel

A handwritten signature in dark ink, appearing to read "L. G. Lerner", is written over the typed name of the Associate General Counsel.

BY: Lois G. Lerner
Associate General Counsel

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 3, 1989

Martin Mendelsohn, Esquire
Suite 1100
1700 K Street, N.W.
Washington, D.C. 20006

RE: MUR 2689
Salute America PAC and Levi
Rabinowitz, as treasurer

Dear Mr. Mendelsohn:

On April 5, 1988, the Commission found reason to believe your clients, Salute America PAC and Levi Rabinowitz, as treasurer, violated 2 U.S.C. § 434(a)(4) regarding your clients' failure to file timely its 1985 Year End and 1986 April, July and October Quarterly Reports. Additionally, on June 7, 1988, the Commission found reason to believe your clients violated 2 U.S.C. § 434(a)(4)(A)(iv) by failing to timely file its 1987 Year End Report. Moreover, on July 7, 1988, the Commission found reason to believe your clients violated 2 U.S.C. §§ 441a(a)(1)(A), 441a(f), 434(b), as well as, 11 C.F.R. § 104.11(a). Moreover, on September 7, 1988, the Commission determined that there was reason to believe your clients violated 2 U.S.C. § 434(a)(4)(A)(i) and (iv) regarding its failure to file and to file timely the 1987 Mid Year Report and 1988 April Quarterly Report.

As a result of your prior request, on February 27, 1989, 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. Also on that date the Commission found no reason to believe your clients violated 2 U.S.C. § 433 regarding possible affiliation with the Friends of Vin Weber.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If your clients agree with the provisions of the enclosed agreement, please sign and return it, 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.

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Martin Mendelsohn
Page 2

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 Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel


By: Lois G. Lerner
Associate General Counsel

Enclosure
Conciliation Agreement

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MYERSON KUHN & STEWART

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

89 JUL 12 PM 11:52

Washington, DC
New York
Philadelphia
Dallas

July 10, 1989

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE SERVICES BRANCH
89 JUL 12 AM 10:41

Patty Riley, Esquire
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR's 2689 and 2769

Dear Ms. Riley:

Enclosed is the signed copy by Mr. Rabinowitz of the concillation agreement between the Federal Election Commission and Salute America Political Action Committee. I hope this closes the matter.

Thank you for all of your patience and cooperation in bringing this case to a resolution.

Sincerely,



Martin Mendelsohn

MM:jph

Enclosure

BEFORE THE FEDERAL ELECTION COMMISSION NOV 20 AM 11:32

In the Matter of)

Salute America Political Action)

Committee and Levi Rabinowitz, as)
treasurer)

MURs 2689 and 2769

GENERAL COUNSEL'S REPORT

SENSITIVE

I. BACKGROUND

Attached for Commission approval is a single conciliation agreement incorporating information from two agreements previously approved by the Commission for Salute America Political Action Committee ("the Committee") and Levi Rabinowitz, as treasurer.1/

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In light of the foregoing, the Office of the General Counsel recommends that the Commission accept the proposed agreement and close the files in these matters.

II. RECOMMENDATIONS

1. Accept the attached proposed agreement of Salute America Political Action Committee and Levi Rabinowitz, as treasurer.
2. Approve the attached letters.
3. Close the files in these matters.

Lawrence M. Noble
General Counsel

Date

7/19/89

BY:



Lois G. Lerner
Associate General Counsel

Attachments

1. Response
2. Proposed Agreement
3. Letters (3)

Staff Person: Patty Reilly

09c

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Salute America Political Action) MURS 2689 and 2769
Committee and Levi Rabinowitz,)
as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on July 25, 1989, the Commission decided by a vote of 6-0 to take the following actions in MURS 2689 and 2769:

1. Accept the attached proposed agreement of Salute America Political Action Committee and Levi Rabinowitz, as treasurer.
2. Approve the letters as recommended in the General Counsel's Report dated July 19, 1989.
3. Close the file.

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

Attest:

7-25-89

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in the Office of Commission Secretary:	Thur. July 20, 1989	11:31
Circulated on 48 hour tally basis:	Fri. July 21, 1989	12:00
Deadline for vote:	Tues. July 25, 1989	4:00

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 28, 1989

Robert F. Bauer, Esquire
Democratic Congressional Campaign
Committee
430 South Capitol Street, S.E.
Washington, D.C. 20003

RE: MUR 2689 (formerly MUR 2526)

Dear Mr. Bauer:

This is in reference to the complaint you filed with the Federal Election Commission on August 5, 1987, concerning the Friends of Vin Weber and Robert Kovell, as treasurer, and Salute America Political Action Committee, and Levi Rabinowitz, as treasurer.

The Commission found that there was no reason to believe the Friends of Vin Weber and its treasurer violated 2 U.S.C. § 433, a provision of the Federal Election Campaign Act of 1971, as amended. Additionally, the Commission found reason to believe Salute America PAC and Levi Rabinowitz, as treasurer, violated 2 U.S.C. §§ 434(a)(4), 441a(a)(1)(A), 441a(f), and 434(b), provisions of the Act, as well as, 11 C.F.R. § 104.1(a), a provision of the Commission's Regulations. An investigation was then conducted. On July 25, 1989, a conciliation agreement signed by the respondents was accepted by the Commission. This agreement also addressed another matter involving the Committee (MUR 2769). Accordingly, the Commission closed the file in these matters on July 25, 1989. A copy of this agreement is enclosed for your information.

If you have any questions, please contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

** original signed*

BY: Lois G. Lerner
Associate General Counsel

Enclosure
Conciliation Agreement

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 28, 1989

Richard J. Christiansen, treasurer
Friends of Vin Weber
Box 848
New Ulm, MN 56073

RE: MUR 2689 (formerly MUR 2526)
Friends of Vin Weber and
Richard J. Christiansen, as
treasurer

Dear Mr. Christiansen:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

* original signed

BY: Lois G. Lerner
Associate General

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 28, 1989

Martin Mendelsohn, Esquire
Myerson, Kuhn, & Sterrett
1010 Pennsylvania Avenue, N.W.
Washington, D.C. 20004

RE: MURs 2689 and 2769
Salute America Political
Action Committee and Levi
Rabinowitz, as treasurer

Dear Mr. Mendelsohn:

On July 25, 1989, the Federal Election Commission accepted the signed conciliation agreement submitted on behalf of your clients in settlement of violations of 2 U.S.C. §§ 441a(f), 441a(a)(1)(A), 434(b), and 434(a)(4), provisions of the Federal Election Campaign Act of 1971, as amended, as well as 11 C.F.R. § 104.11(a), a provision of the Commission's Regulations. Accordingly, the file has been closed in this matter. 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.

Enclosed you will find a copy of the fully executed conciliation agreement for your files. Please note that the first installment of the civil penalty is due on July 31, 1989.

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Martin Mendelsohn
Page Two

If you have any questions, please contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel



BY: Lois G. Lerner
Associate General Counsel

Enclosure
Conciliation Agreement

89040761510

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Salute America Political Action) MURs 2689 and 2769
and Levi Rabinowitz, 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.

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Additionally, this matter also arose as a result of a complaint filed by Robert F. Bauer, counsel for the Democratic Congressional Campaign Committee. The Commission found reason to believe that Salute America Political Action Committee and Levi Rabinowitz, as treasurer ("Respondents") violated 2 U.S.C. §§ 434(a)(4), 441a(a)(1)(A), 441a(f), 434(b), and 11 C.F.R. § 104.11(a). The Commission found reason to believe, and subsequently probable cause to believe, respondents violated 2 U.S.C. § 434(a)(4)(A)(i) regarding the late filing of its 1988 July Quarterly Report.

NOW, THEREFORE, the Commission and the Respondents, having participated in informal methods of conciliation, prior to a finding of probable cause to believe, and having duly entered into conciliation pursuant to 2 U.S.C. § 437g(a)(4)(A)(i), 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:

A. The Respondents

1. Respondent, Salute America Political Action Committee is a political committee within the meaning of 2 U.S.C. § 431(4).

2. Respondent, Levi Rabinowitz, is the treasurer of Salute America Political Action Committee.

B. Failure to File Timely Reports

1. Pursuant to 2 U.S.C. § 434(a)(4), political committees that are not authorized committees are required to file on either a monthly or a quarterly basis.

2. Pursuant to 2 U.S.C. § 434(a)(4)(A)(i), such committees are required to file quarterly reports in a calendar year in which a regularly scheduled general election is held, which shall be filed no later than the 15th day after the last day of each calendar quarter. The last report for the quarter ending on December 31 shall be filed no later than January 31 of the following calendar year. Id.

3. Pursuant to 2 U.S.C. § 434(a)(4)(A)(iii), such committees are required to file a post-election report, which shall be filed no later than 30 days after the general election and which shall be complete as of the 20th day after such general election.

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4. Pursuant to 2 U.S.C. § 434(a)(4)(iv), in any other calendar year, a report covering the period beginning January 1 and ending June 30 shall be filed no later than July 31. A report covering the period July 1 and ending December 31 shall be filed no later than January 31 of the following calendar year.

5. Respondents failed to file timely the following nine reports:

	<u>Report</u>	<u>Due</u>	<u>Filed</u>	<u>Days Late</u>
1.	1985 Year End	1/31/86	3/9/87	402
2.	1986 April Quarterly	4/15/86	3/9/87	328
3.	1986 July Quarterly	7/15/86	3/9/87	236
4.	1986 October Quarterly	10/15/86	3/9/87	145
5.	1986 Post-General	12/4/86	5/23/88	536
6.	1986 Year End	1/31/87	5/23/88	478
7.	1987 Mid Year	7/31/87	11/3/87	95
8.	1987 Year End	1/3/88	11/7/88	280
9.	1988 July Quarterly	7/15/88	11/7/88	115

6. For the period between June 1, 1985 and June 30, 1988, respondents reported receipts totalling \$88,081.73 and disbursements totalling \$88,786.34.

C. Excessive Contributions

1. Pursuant to 2 U.S.C. § 441a(a)(1)(A), political committees that are not multicandidate committees are limited to contributing \$1,000 per election to an authorized committee of a candidate.

2. Pursuant to 2 U.S.C. § 441a(a)(1)(C), no person may make a contribution to an unauthorized political committee that exceeds \$5,000 per year.

3. Pursuant to 2 U.S.C. § 441a(f), political committees are prohibited from accepting contributions exceeding the Act's limitations.

4. Pursuant to 2 U.S.C. § 431(8)(A), a contribution includes a loan made by any person for the purpose of influencing a federal election.

5. At a time when Salute America was not a multicandidate committee, respondents made a \$2,500 contribution to the Friends of Senator D'Amato, an authorized committee.

6. At a time when Salute America was not a multicandidate committee, respondents made a \$5,000 contribution to the Friends of Vin Weber, an authorized committee.

7. Respondents accepted a \$5,500 loan from Morris Talansky during the 1987 July Quarterly reporting period.

D. Failure to Continuously Report Loans

1. Pursuant to 2 U.S.C. § 434(b)(3)(E), political committees are required to report the identification of each person who makes a loan to a reporting committee during the reporting period, together with the identification of any endorser or guarantor of such loan, and the date and amount or value of such loan.

2. Pursuant to 2 U.S.C. § 434(b)(8), political committees are required to report the amount and nature of outstanding debts

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and obligations owed by or to the reporting committee.

3. Pursuant to 11 C.F.R. § 104.11(a), outstanding debts and obligations owed by a political committee must be continuously reported on separate schedules together with a statement explaining the circumstances and conditions under which each debt and obligation was incurred or extinguished.

4. Respondents failed to continuously report \$70,500 in outstanding loans from fourteen persons.

5. Respondents failed to file complete Schedules C disclosing required loan information.

V. 1. Respondents failed to file timely the above-noted reports in violation of 2 U.S.C. § 434(a)(4).

2. Respondents made a \$2,500 contribution to the Friends of Senator D'Amato and a \$5,000 contribution to the Friends of Vin Weber in violation of 2 U.S.C. § 441a(a)(1)(A).

3. Respondents accepted a \$5,500 contribution from Morris Talansky in violation of 2 U.S.C. § 441a(f).

4. Respondents failed to continuously report \$70,500 in loans made by fourteen persons, and failed to include all required information regarding such loans, in violation of 2 U.S.C. § 434(b) and 11 C.F.R. § 104.11(a).

VI. 1. Respondents will pay a civil penalty to the Federal Election Commission in the amount of seven thousand, five hundred dollars (\$7,500), pursuant to 2 U.S.C. § 437g(a)(5)(A), such payment to be paid as follows:

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2. One initial payment of \$1,500 due on July 31, 1989;

3. Thereafter, beginning on September 1, 1989, six consecutive monthly installment payments of \$1,000 each;

4. Each such installment shall be paid on the first day of the month in which it becomes due;

5. In the event that any installment payment is not received by the Commission by the fifth day of the month in which it becomes due, the Commission may, at its discretion, accelerate the remaining payments and cause the entire amount to become due upon ten days written notice to the respondents. Failure by the Commission to accelerate the payments with regard to any overdue installment shall not be construed as a waiver of its right to do so with regard to future overdue installments.

6. Respondents will refund to Morris Talansky the excessive portion of his contribution.

7. Respondents will file complete Schedules C for all reports including all information required at 11 C.F.R.

§ 104.11(a).

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

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

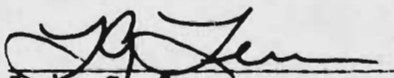
IX. Respondents shall have no more than 30 days from the date this agreement becomes effective to comply with and implement the requirement contained in this agreement and to so notify the Commission.

X. The 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:


Lois G. Lerner
Associate General Counsel

Date

7/29/88

FOR THE RESPONDENTS:


Levi Rabinowitz
Treasurer

Date

7/7/89

89040701523



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2689

DATE FILMED 8/29/89 CAMERA NO. 7

CAMERAMAN AS

39040761524



FEDERAL ELECTION COMMISSION

WASHINGTON D C 20463

THE FOLLOWING MATERIAL IS BEING ADDED TO THE
PUBLIC RECORD IN (CLOSED) MUR 2689

800407/1721

LEVI RABINOWITZ

The Ways and Means Company, Inc.

Crystallizing Public Opinion Into Political Action

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

September 8, 1989

89 SEP 18 AM 9:13

Ms. Patty Reilly
Attorney
Federal Election Commission
999 E. Street, NW
Washington, D.C. 20463

CLOSED

MUR 2689

89 SEP 18 PM 1:33

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

Dear Ms. Reilly:

I write today to respectfully request your indulgence in a matter which causes me both grave concern and considerable embarrassment.

Due to the sudden, totally unexpected loss of 50% of my income, I am unable to meet the payment schedule set forth in an agreement I signed as treasurer on behalf of Salute America Political Action Committee. When I signed the agreement, I fully expected that I would be able to fulfill the agreement in its entirety.

I am asking for a grace period during which I would have time to recover financially. Please consider suspending the agreement until January 15, 1990. At that time, I propose to sit down with you to reschedule the payment terms. I firmly believe I will be able to put my finances in order by that time.

Allow me to call your attention to the circumstances leading up to the agreement and the penalties set forth therein. Salute America PAC had been tardy with its report filings. (Filings are now current). During the time in question, the PAC had no significant activity in terms of receipts or disbursements. Therefore, there was no attempt to withhold information, or to prevent disclosure. Each subsequent report revealed the same information, as your records will indicate.

Let me also point out to you that Salute America PAC was intended to provide opportunities for successful immigrants to celebrate their achievements in America. The PAC's original founders had hoped to support programs, legislation and candidates in an effort to promote the "American Dream". It is unfortunate that the PAC has been unable to progress forward in its vision.

I will greatly appreciate your consideration in this matter, and I look forward to sitting down with you in January.

Sincerely,

Levi Rabinowitz
Salute America PAC
Treasurer



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THE FOLLOWING MATERIAL IS BEING ADDED TO THE

PUBLIC RECORD IN (CLOSED) MUR 2689/2769

8 9 0 4 0 7 2 7 1 6

89 OCT 24 AM 10:02

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

SENSITIVE

Salute America Political Action	)	MURs 2689 and 2769
Committee and Levi Rabinowitz,	)	(closed cases)
as treasurer	)	

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On July 19, 1989, the Commission approved a combined conciliation agreement for the respondents in the above-captioned matters and closed the files. This agreement required respondents to pay a \$7,500 civil penalty in seven installments. The first installment of \$1,500 was due on July 31, 1989, with six consecutive monthly payments to be made on the first of each month from September 1, 1989 until February 1, 1990.

On August 2, 1989, the treasurer, Mr. Rabinowitz, contacted this Office explaining, he would not be able to make his first payment until August 15, 1989. Staff informed him that he was in default of his agreement and faced the possibility of civil suit. In light of respondent's representation that the first installment would be paid on that date, this Office agreed to forestall a civil suit recommendation.

When the August 15, 1989, date passed without receipt of a civil penalty check, this Office contacted Mr. Rabinowitz for an explanation. Mr. Rabinowitz requested a meeting with staff to discuss the matter. This meeting was held on September 6, 1989, and is memorialized in the attached letter.

89040772717

Mr. Rabinowitz stated that although he believed at the time that he signed the agreement he could comply with its terms, reverses in his business have made it impossible for him to meet the payment schedule in the conciliation agreement. The treasurer thus requests that the Commission to "provide a grace period" until January 15, 1990 and to reschedule the payments of the civil penalty at that time.

This Office is opposed to the complete suspension of the civil penalty payments as proposed by the respondent. This Office instead recommends that the Commission approve a revised payment schedule, including monthly payments, until the date Mr. Rabinowitz anticipates that his finances will be in order.¹ Thus, this Office recommends that the Committee and its treasurer be required to immediately make payments of \$100 per month, and on January 15, 1990, commence payments of \$1,000 monthly. Moreover, this Office recommends that the Commission approve the attached proposed letter that stresses to Mr. Rabinowitz the importance of meeting these payments and that failing to meet these obligations may result in civil suit.

II. RECOMMENDATIONS

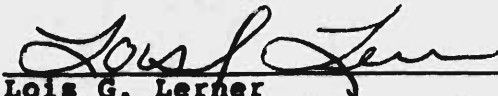
1. Approve the payment schedule for the Salute America Political Action Committee and Levi Rabinowitz, as treasurer.

1. This is consistent with the Commission's actions in MUR 2012 where the respondents of a signed conciliation agreement were unable to immediately pay the civil penalty.

2. Approve the attached letter.

Lawrence M. Noble
General Counsel

10/23/89
Date

BY: 
Lois G. Lerner
Associate General Counsel

Attachments

1. Request
2. Letter to Respondent

Staff Assigned: Patty Reilly

82040772719

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Salute America Political Action) MURs 2689 and 2769
Committee and Levi Rabinowitz,)
as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on October 26, 1989, the Commission decided by a vote of 5-0 to take the following actions in MURs 2689:

1. Approve the payment schedule for the Salute America Political Action Committee and Levi Rabinowitz, as treasurer, as recommended in the General Counsel's Report dated October 23, 1989.
2. Approve the letter, as recommended in the General Counsel's Report dated October 23, 1989.

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

Attest:

10-27-89

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in the Secretariat: Tuesday, October 24, 1989 10:02 a.m.
Circulated to the Commission: Tuesday, October 24, 1989 4:00 p.m.
Deadline for vote: Thursday, October 26, 1989 4:00 p.m.



FEDERAL ELECTION COMMISSION

WASHINGTON D.C. 20463

October 31, 1989

Levi Rabinowitz, Treasurer
Salute America Political
Action Committee
1250 24th Street, N.W.
Washington, D.C. 20037

CLOSED

RE: MURs 2689 and 2769
(closed cases)

Dear Mr. Rabinowitz:

On October 26, 1989, the Commission considered your recent letter regarding your inability to meet the civil penalty payment schedule in your conciliation agreement. On that date the Commission approved a revised payment schedule requiring you to make \$100 payments on November 15 and December 15, 1989. Additionally, as of January 15, 1990 you are required to make monthly payments of \$1,000 on the fifteenth day of each month, with a final \$1,300 payment due on June 15, 1990.

The Commission considers this to be its final accommodation in this matter. In the event these payments are not made in a timely manner, the Office of the General Counsel will seek Commission authorization to institute a civil suit in the U.S. District Court.

Should you have any questions, please contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: 
Lois G. Lerner
Associate General Counsel

930407B2721

2 4 9 3 1

8 9 9 4 7 0 0



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THE FOLLOWING DOCUMENTATION IS ADDED TO
THE PUBLIC RECORD IN CLOSED MUR 2689.

900407038330

0009579

CLOSED



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 20, 1990

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Levi Rabinowitz, Treasurer
Salute America Political
Action Committee
1250 24th Street, N.W.
Washington, D.C. 20037

RE: MURs 2689 and 2769
(closed cases)

Dear Mr. Rabinowitz:

On July 25, 1989, the Federal Election Commission and Salute America Political Action Committee ("Committee") and you, as treasurer, entered into a conciliation agreement in settlement of violations of the Act in the above captioned matters. At your request, on October 26, 1989 the Commission approved a revised payment schedule for your civil penalty. This schedule required you to make \$100 payments on November 15 and December 15, 1989. Additionally, as of January 15, 1990 you were required to make monthly payments of \$1,000 on the fifteenth day of each month, with a final \$1,300 payment due on June 15, 1990.

According to Commission records, no payments have been received to date. Please be advised that, pursuant to 2 U.S.C. § 437g(a)(5)(D), violation of any provision of the conciliation agreement may result in the institution of a civil suit for relief in the United States District Court. Unless we receive the payments from you in five days, this Office will recommend that the Commission file suit to remedy this violation.

If you believe the Commission's records are in error, or if you have any questions, please contact Patty Reilly, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

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

BY: Lois G. Lerner
Associate General Counsel

9004070334