



FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

THIS IS THE BEGINNING OF MUR # 2726

DATE FILMED 6/15/89 CAMERA NO. 4

CAMERAMAN AS

89040752270

06C#924

RECEIVED
FEDERAL ELECTION COMMISSION
540 ROOM

WWTN 2776

. GAFFNEY AND DIFABIO
ATTORNEYS AT LAW

88 NOV -7 AM 10:47

J. BRIAN GAFFNEY
ANTHONY F. DIFABIO
MICHAEL K. PATENAUDE
JAY F. MALCYNISKY
E. TIMOTHY SULLIVAN JR.

ONE LIBERTY SQUARE
NEW BRITAIN, CONNECTICUT 06051
TELEPHONE (203) 229-0301

November 1, 1988

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

Re: COMPLAINT

To the Commission:

Enclosed find a complaint by Mrs. Elizabeth Heminway against the Greenwich Presidential Issues Campaign '88 and its treasurer, Mr. F. Champion Ward.

Note that in paragraphs 10, 11 and 12, the Complainant makes representations with regard to information obtained by me, at her direction, in order to determine if a complaint should be lodged against the Respondents. As the complaint states, I did place telephone calls to the Commission Office of Public Records and the Connecticut Secretary of State Election Services office to determine if the Respondent had filed registration and disclosure statements, as required. I then relayed the results of these calls to my client. The statements in the complaint accurately reflect the information I obtained in the course of those calls.

Please consider this letter as a supporting affidavit and part of the complaint.

Sincerely,

Lawrence J. Halloran
Lawrence J. Halloran
Attorney

Personally appeared LAWRENCE J. HALLORAN, and made oath to the truth of the matters contained in the foregoing, before me.

Angela M Del Campo
Notary Public
My Commission Expires March 31, 1993

89040752271

RECEIVED
FEDERAL ELECTION COMMISSION
88 NOV -7 PM 1:25

Mrs. Elizabeth Heminway
14 Deer Lane
Greenwich, CT 06830

FEDERAL ELECTION COMMISSION

COMPLAINANT

Greenwich Presidential Issues Campaign '88
Franklin C. Ward
31 Strickland Road
Cos Cob, CT 06807

November 1, 1988

RESPONDENTS

COMPLAINT

1. I, Mrs. Elizabeth Heminway, (hereinafter "the Complainant") am a resident of Greenwich, Connecticut, and I have personal knowledge of the matters stated herein, except as otherwise noted.

2. On information and belief, the respondent Greenwich Presidential Issues Campaign '88 (hereinafter "the Committee") is a political committee. (See, Paragraph 11, infra.)

3. On information and belief, and according to published sponsorship statements on political advertisements, infra, respondent Frederick C. Ward is the treasurer of the respondent Greenwich Presidential Issues Campaign '88.

I. Lack of Authorization Statement

4. On October 26, 1988, Respondents caused to be published in the Greenwich Time, a daily newspaper of general circulation in southwestern Connecticut, an advertisement advocating the election of clearly identified candidates for the federal offices of President and Vice President of the United States. A copy of the advertisement is hereby incorporated as part of this complaint and is attached hereto as Exhibit 1.

5. On October 27, 1988, Respondents caused to be published in the Greenwich Time, a daily newspaper of general circulation in southwestern Connecticut, an advertisement advocating the election of clearly identified candidates for the federal offices of President and Vice President of the United States. A copy of the advertisement is hereby incorporated as part of this complaint and is attached hereto as Exhibit 2.

6. On October 28, 1988, Respondents caused to be published in the Greenwich Time, a daily newspaper of general circulation in southwestern Connecticut, an advertisement advocating the election of clearly identified candidates for the federal offices of President and Vice President of the United States. A copy of the advertisement is hereby incorporated as part of

8 9 0 4 0 7 5 2 2 7 2

3 9 0 4 0 7 5 2 2 7 3
this complaint and is attached hereto as Exhibit 3.

7. The advertisements of October 26, 27 and 28 displayed the following statement of sponsorship, or disclaimer: Paid for by Greenwich Presidential Issues Committee '88 F. Champion Ward, treasurer. See, Exhibits 1, 2 and 3.

8. The sponsorship statements of the October 26, 27 and 28 advertisements are in violation of the requirements of 2 U.S.C. 441d(a)(3) and 11 CFR 110.11(a)(1)(iii) inasmuch as the disclaimer does not indicate whether or not the advertisements have been authorized by a candidate or a candidate's authorized committee(s).

II. Failure to Disclose Independent Expenditures

9. On October 28, 1988 Complainant called the advertising offices of the Greenwich Time and was told that each such ad cost \$378.00.

10. On October 31, 1988 Complainant directed her attorney to call the office of the Connecticut Secretary of State and the Federal Election Commission to determine if the Respondents had registered as a political committee and had filed disclosure reports.

11. On October 31, the Complainant was informed by her attorney that a Statement of Organization (FEC Form 1) dated October 19, 1988 had been forwarded to the office of the Connecticut Secretary of State and was available for public inspection there. According to the information obtained from the Connecticut Secretary of State, the Statement of Organization submitted by the Respondents indicates that the Respondent Committee is a non-connected committee organized to support the candidacy of the Democratic nominees for President and Vice President in the 1988 general election. According to the information obtained from the office of the Connecticut Secretary of State, no report of independent expenditures made by the Respondent Committee had been received by the office of the Connecticut Secretary of State.

11. On October 31, 1988 Complainant was informed by her attorney that the Federal Election Commission, Office of Public Records, had received neither a Statement of Organization nor a disclosure of independent expenditures from the Respondents.

11. On information and belief, Respondents have spent more than \$1000.00 on independent expenditures made after the twentieth day before the election but before twenty-four hours before 12:01am of the day of the election.

12. On information and belief, the Respondents have failed to file a required disclosure of independent expenditures made by a political committee in excess of \$1000 after the twentieth day before an election. This failure to disclose independent expenditures by a political committee within twenty-

89040752274

Respectfully submitted,

STATE OF CONNECTICUT)
)
COUNTY OF FAIRFIELD) ss: Greenwich

Date: Nov. 4, 1988

Margarete Gramlich
Notary Public MARGARETE GRAMLICH
NOTARY PUBLIC
My Commission Expires: My commission expires March 31, 1993

POLITICAL ADVERTISEMENT

**BECAUSE WE MUST NOT LEAVE A DEBT OF
\$2,300,000,000,000
FOR OUR CHILDREN TO PAY***

* The current administration more than doubled the debt accumulated in all the administrations since George Washington. That's \$8,225 for every man, woman and child!



WE SUPPORT DUKAKIS/BENTSEN

Leo Arnabaldi
Sheila Arnabaldi
Eileen Lamphier
Don Kirk
Molly Colombo
Barbara Hegarty
Nusrat Rizzi
Jean Bergstresser

Richard Bergstresser
Cecie Munkenbeck
Martin Tomberg
Berta Hogan Lennon
Diane C. Clarke
Barbara Bloch
Rabbi Robert B. Lennick
Norman L. Hoberman

Paid for by Greenwich Presidential Issue Campaign '88 F. Champion Ward, treasurer

89040752275

POLITICAL ADVERTISEMENT

BECAUSE WE DESERVE A VICE PRESIDENT WE CAN TRUST TO BE PRESIDENT*

*Four of the last nine Vice Presidents (44%) became President...

Harry S. Truman... Lyndon B. Johnson... Richard M. Nixon... Gerald R. Ford...

Can our nation risk a Quayle Presidency?



WE SUPPORT DUKAKIS/BENTSEN

Ruth L. Sims
Nancy Bernard
Allan Bernard
Lois Luehrs
Bob Luehrs
Nanette B. Pugh
Adele Teitell
Anthony Hayden

Rabbi Robert B. Lennick
Jo Ubogy
Janet L. Gleeson
Harry Woodman
Betty Woodman
Tom Woodman
Carol Woodman
Barbara Bloch
Mary Anne Hoberman

Paid for by Greenwich Presidential Issues Campaign '88 — F. Champion Ward, treasurer

99040752276

apartments in Stamford.

The bank is to offer low-interest loans of up to \$1 million, aiding affordable-housing efforts in the city. The new Stamford Development Bank expects to help finance the construction and the purchase of land for between 50 and 100 new rental apartments in its first year of operation.

The bank would provide loans at below-market rates to developers of affordable apartments. So

lead prices and ed with funding p.

"This gives us a taste of our own deep pocket," said Lesley Higgins-Biddle, head of the non-profit Neighborhood Housing Services. "I think it's going to be great."

State Sen. Richard Blumenthal

...it than apartment for a just amount would cost for out \$735 a month, excluding utilities.

When a project is first built and occupied, at least 20 percent of the residents must be in the low-income bracket.

STAFF PHOTO BY THE GREEN of Greenwich Library, at a reception

A stairwell must be enclosed and the storage of materials in the basement must be changed, Mainiero said. "We're reorganizing what we do down there."

Next, Mainiero said she plans to take inventory.

"I really want to look at how we offer services, whether we're doing it specifically as possible, the best way available, or things that we have been doing for a long time that maybe it's best to drop," she said.

She also wants to bounce some new ideas off the staff. "I'll be talking to each person on an individual level and meeting with each department, and my questions will be 'Why don't we...'"

POLITICAL ADVERTISEMENT

BECAUSE WE MUST LEAVE A HEALTHY ENVIRONMENT FOR OUR CHILDREN*

* Polluted Beaches...Acid Rain...Hazardous Waste...Thinning Ozone Shield...Greenhouse Effect... The League of Conservation Voters endorsed Dukakis and gave Bush a "D" on his environmental record. Whom do you trust to meet the challenge?



WE SUPPORT DUKAKIS/BENTSEN

Hermine Aborn
Dr. Richard Abell
Scott Bartlett
Eugene H. Blanche
Frederick B. Boyden
Lucy G. Boyden
Gene Bylinsky
Gwen Bylinsky
Molly Colombo
Richard Colombo
Richard E. Deutsch
Esme J. Dick
Edith Fehr

Robert O. Fehr
Abby H. Gross
William A.O. Gross
Jane G. Hall
Lilly M. Hampton
Merrilee W. Harvik
George W. Harvik
Diana C. Harrington
William G. Harrington
Barbara Hegarty
William E. Hegarty
Shaye Hester
Harrison B.W. Hoffman
Louise S. Hoffman

John K. Hopley
Cornelia O. Jahncke
Pyke Johnson, Jr.
Peggy Kavounas
Ed Kavounas
E.J. Kavounas
John Kavounas
Anne Lamont
Ned Lamont
Rabbi Robert B. Leacock
George J. Lutz
Jane Maliken
Jeanne Nolte

Richard H. Motte
Lovel P. Perkins
Mahon F. Perkins
Ralph Pomerance
A. Richard Roberts
William D. Ross
Irene Senter
William J. Senter
Mary B. Sullivan
Walter S. Sullivan
Barbara W. Tuchman
Dr. Lester Tuchman

Paid for by Greenwich Presidential Issues Campaign '88, F. Champion Ward, Treasurer

OPENING
NOVEMBER 7, 1988

Signature



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 9, 1988

SPECIAL DELIVERY

F. Champion Ward, Treasurer
Greenwich Presidential Issues
Campaign '88
31 Strickland Road
Cos Cob, CT 06807

RE: MUR 2776
Greenwich Presidential
Issues Campaign '88

Dear Mr. Ward:

This letter is to notify you that on November 7, 1988, the Federal Election Commission received a complaint which alleges that Greenwich Presidential Issues Campaign '88 and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2776. 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 Greenwich Presidential Issues Campaign '88 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. You are encouraged to respond to this notification promptly. In order to facilitate an expeditious response, we have enclosed a pre-addressed, postage paid, special delivery envelope. If no response is received within 15 days, the Commission may take further action based on the available information.

The complaint may be dismissed by the Commission prior to the receipt of your response if the evidence submitted does not indicate that a violation of the Act has been committed. Should the Commission dismiss the complaint, you will be notified by overnight express mail.

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

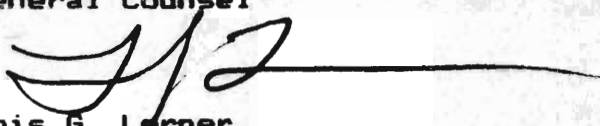
8 9 0 4 0 7 5 2 7 8

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.

If you have any questions, please contact Frania Monarski at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel



By: Lois G. Lerner
Associate General Counsel

Enclosures
Complaint
Procedures
Envelope
Form

89040752279



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 9, 1988

SPECIAL DELIVERY

Mr. Lawrence J. Halloran
Gaffney and DiFabio
One Liberty Square
New Britain, CT 06051

RE: MUR 2776

Dear Mr. Halloran:

This letter acknowledges receipt on November 7, 1988, of your complaint against Greenwich Presidential Issues Campaign '88 and F. Champion Ward, as treasurer, alleging violations of the Federal Election Campaign laws. A staff member has been assigned to analyze your allegations. The respondents will be notified of this complaint within 24 hours. You will be notified as soon as the Commission takes final action on your complaint. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Please be advised that this matter shall remain confidential in accordance with 2 U.S.C. Sections 437g(a)(4)(B) and 437g(a)(12)(A) unless the respondents notify the Commission in writing that they wish the matter to be made public.

Sincerely,

Lawrence M. Noble
General Counsel

By: Lois G. Lerner
Associate General Counsel

Enclosure
Procedures

89040752280



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 9, 1988

SPECIAL DELIVERY

Ms. Elizabeth Heminway
14 Deer Lane
Greenwich, CT 06830

RE: MUR 2776

Dear Ms. Heminway:

This letter acknowledges receipt on November 7, 1988, of your complaint against Greenwich Presidential Issues Campaign '88 and F. Champion Ward, as treasurer, alleging violations of the Federal Election Campaign laws. A staff member has been assigned to analyze your allegations. The respondents will be notified of this complaint within 24 hours. You will be notified as soon as the Commission takes final action on your complaint. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Please be advised that this matter shall remain confidential in accordance with 2 U.S.C. Sections 437g(a)(4)(B) and 437g(a)(12)(A) unless the respondents notify the Commission in writing that they wish the matter to be made public.

Sincerely,

Lawrence M. Noble
General Counsel

By: 
Lois G. Kerner
Associate General Counsel

Enclosure
Procedures

8 9 0 4 0 7 5 2 8 1

F. CHAMPION WARD
31 STRICKLAND ROAD
COS COB. CONNECTICUT 06807

RECEIVED
FEDERAL ELECTION COMMISSION

November 15, 1988 88 NOV 21 AM 9:03

MUR 2776 (Greenwich
Presidential Issues Campaign)

SPECIAL DELIVERY

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

Dear Sirs:

This is in response to your letter of November 9, 1988, which reached me on November 14. I believe that the best way to explain the difficulties I have encountered and the mistakes I have made as Treasurer of a "nonconnected political committee" is to ask that my letter to the Commission of October 31 be read (copy attached), then to add slightly to that letter, and then to report on what I have done since my attention was called to those mistakes to conform to the regulations concerning the reporting of contributions and independent expenditures.

When the person who had taken the lead in organizing the committee found that she had to accompany her parents to Florida in mid-October, I was asked to serve as Treasurer and given a set of papers which had been sent to her by the Federal Election Commission. I mistakenly thought at the time that because both contributors and expenditures were confined to Connecticut the Statement of Organization should go to Hartford. I also failed to note the detailed reporting duties which fall to the Treasurer, thinking only that I was to keep track of contributions and expenditures and then report them in a final document.

Since I wrote to the Commission on October 31, I have seen to it that the disclaimer required in connection with political advertisements by a nonconnected committee has appeared in all of the Committee's advertisements, beginning with the advertisement of November 2 (copy attached). I have also reported expenditures for these advertisements within 24 hours of their appearance. Copies of those reports are attached.

In addition, I have received from the Commission on November 4 the following identification number for the Committee: C00234112, and I have completed the required Termination Report and enclose it with this letter.

I am embarrassed by the initial errors I made, which I corrected as soon as I could once I understood the role of the Treasurer. I add only that there was never an intent to evade the procedures which, I realize, are designed to prevent abuses.

If the Commission should require further information, I will of course stand ready to supply it.

Sincerely,

F. Champion Ward
F. Champion Ward

STATE OF CONNECTICUT
COUNTY OF FAIRFIELD
FILED AND SIGNED TO BE FOR ME

Jeannette Zehalka
JEANNETTE ZEHALKA
NOTARY PUBLIC
MY COMMISSION EXPIRES MARCH 31, 1992

88 NOV 21 PM 12:39

F. C. CHAMPION WARD
31 STRICKLAND ROAD
COS COB, CONNECTICUT 06807

November 3, 1988

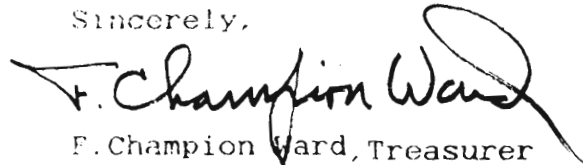
Federal Elections Commission
999 E Street N.W.
Washington, D.C. 20463

Dear Sirs:

I enclose Schedule E of Form 3X, which I received from
your office yesterday.

Enclosed, also, is a copy of my letter to you of October 31,
which I sent by Express Mail on November 1. On the telephone
yesterday, I was informed that the nonconnected committee of
which I am Treasurer should receive its identification number
by Friday, November 4, following a forty-eight hour waiting
period, and that I should call the FEC on that day to secure
the number. That I will do, in the hope that further reports
will carry an identification number for the committee.

Sincerely,


F. Champion Ward, Treasurer

"Greenwich Presidential
Issues Campaign"

8 9 0 4 0 7 5 2 2 8 3

F. CHAMPION WARD
31 STRICKLAND ROAD
COS COB, CONNECTICUT 06807

Tel. 203-661-5654 October 31, 1988

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

Elections Division
Campaign Finance Unit
Office of the Secretary of State
30 Trinity Street, Room 115
Hartford, CT 06106

Dear Sirs:

9 3 0 4 0 7 5 2 2 8 4
I have been serving as Treasurer of a "Nonconnected" political committee entitled "Greenwich Presidential Issues Campaign." Contributions have paid for political advertisements in support of the Dukakis/Bentsen ticket, of which three have appeared, with two or three due to appear this week. I am writing now about a matter which I have discussed on the telephone with the Hartford and then with the Washington office. To them, I explained that I have apparently made two mistakes in connection with reporting requirements. I thought that I was to submit the "Statement of Organization" (copy enclosed) to Hartford and that I was to report contributions and expenditures to Hartford twelve days before the election. The Hartford Office concurred in the second assumption and is sending me an appropriate form. However, the Washington office subsequently pointed out that the originals of the Statement of Organization and of subsequent reports should go to Washington, with a copy to Hartford. That office, also, is sending me an appropriate form, but apparently not the one I am to receive from Hartford.

All of this followed my conclusion last week, when I began to prepare a report 12 days before the election, that the form which I had (FEC Form 5) was apparently not the form which contains the "Schedule E" for which there were directions for filling it out. I then called both Hartford and Washington, as described above, to try to secure the correct form.

Since my report is already late, rather than wait for the new forms to arrive, I hope it will be in order to send you the enclosed list of contributors, amounts contributed, and expenditures to date, which my advisor in the Washington Office said might be considered a response to Lines 6 & 7, Form 5. These are enclosed, with my apologies for misunderstanding the original instructions.

Sincerely,

F. Champion Ward
F. Champion Ward

P.S. Please note that the Statement of Organization was submitted (mistakenly, to the Hartford Office) well before the Committee had received \$1000. On Oct. 18, the Committee had received \$335.

FCW

POLITICAL ADVERTISEMENT

BECAUSE AFFORDABLE, QUALITY EDUCATION IS THE STRENGTH OF AMERICA*

* Michael Dukakis has a workable Student Tuition and Repayment System for all who need help to go to college. Bush was part of an administration that slashed the student loan program.



WE SUPPORT DUKAKIS/BENTSEN

Nan T. Abell
Carolyn Anderson
Lisbeth S. Beck
Lula Ann Blackson
Jocelyn B. Booth
William Dick
Carol N. Dixon
Amy G. Fleishman

Stephen Fuzesi
Harrison B.W. Hoffman
Lucy Johnson
Beverly Jomo
Claire Kane
David Kane
Joseph M. Kaye
Robert O'Neill
Margaret J. Pace

Seymour Polansky
Regina Polansky
Angelo J. Pucci
Albert G. Sims
Elaine Smith
John Vecchiolla
F. Champion Ward
Emogene C. Wilhelm
Nancy C. Wisecup

Paid for by Greenwich Presidential Issues Campaign '88 — F. Champion Ward, treasurer

And not authorized by any candidate or candidate committee

8 9 0 4 0 7 5 2 2 8 5

ITEMIZED INDEPENDENT EXPENDITURES

Page 1 of 2 Pages

(See Reverse Side for Instructions)

Name of Committee (in Full)		I.D. No.		
Greenwich Presidential Issues Campaign		C 0 0 2 3 4 1 1 2		
Full Name, Mailing Address & ZIP Code of Each Payee	Purpose of Expenditure	Date (month, day, year)	Amount	Name of Federal Candidate supported or opposed by the expenditure & office sought
Greenwich Time 20 E. Elm St. Greenwich, CT 06836	Political Ad.	10/26/88	378.00	Duk/Bentsen ☒ Support ☐ Oppose
"	"	10/27/88	378.00	" ☒ Support ☐ Oppose
"	"	10/28/88	378.00	" ☒ Support ☐ Oppose
"	"	11/2/88	378.00	" ☒ Support ☐ Oppose
"	"	11/3/88	378.00	" ☒ Support ☐ Oppose
Greenwich News 33 E. Elm St. Greenwich, CT 06807	"	11/3/88	450.00	" ☒ Support ☐ Oppose
(a) SUBTOTAL of Itemized Independent Expenditures		\$ _____		
(b) SUBTOTAL of Unitemized Independent Expenditures		\$ _____		
(c) TOTAL Independent Expenditures		\$ _____		

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, concert with, or at the request or suggestion of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures did not involve the financing of dissemination, distribution, or republication in whole or in part of any campaign materials prepared by the candidate, his campaign committee, or their agent.

F. Champin Ward Nov. 17, 88
Signature Date

Subscribed and sworn to before me this 17th day of November, 1988

My Commission expires

Jeanetta Zehala
JEANETTA ZEHALA
NOTARY PUBLIC
MY COMMISSION EXPIRES MARCH 31, 1992

Mailed to FEC Nov. 3

ITEMIZED INDEPENDENT EXPENDITURES

Page _____ of _____ Pages

(See Reverse Side for Instructions)

Name of Committee (in Full)

Greenwich Presidential Issue Campaign

I.D. No.

awaited

Full Name, Mailing Address & ZIP Code of Each Payee	Purpose of Expenditure	Date (month, day, year)	Amount	Name of Federal Candidate supported or opposed by the expenditure & office sought
Greenwich Time	Political Ads.	Nov. 2	378.00	Dukakis/Bentsen ☒ Support ☐ Oppose
Greenwich Time	Political Ad.	Nov. 3	378.00	II, ☒ Support ☐ Oppose
Greenwich News	Political Ad.	Nov. 3	450.00	☒ Support ☐ Oppose
				☐ Support ☐ Oppose
				☐ Support ☐ Oppose
				☐ Support ☐ Oppose
				☐ Support ☐ Oppose

BTOTAL of Itemized Independent Expenditures

\$ 1206.00

BTOTAL of Unitemized Independent Expenditures

\$

TOTAL Independent Expenditures

\$ 1206.00

I hereby certify that the independent expenditures reported are not made in cooperation, consultation, concert with, or at the suggestion of any candidate or any authorized committee or agent and are not made in part of any campaign materials prepared by the candidate, his committee, or their agent.

Subscribed and sworn to before me this _____ day of _____, 19____

My Commission expires _____

NOTARY PUBLIC

Signature

Date

mailed to FEC + State Nov. 4

MODULE E

ITEMIZED INDEPENDENT EXPENDITURES

Page 1 of 1 Pages

(See Reverse Side for Instructions)

Name of Committee (in Full)			I.D. No.		
Greenwich Presidential Issues Campaign			C 00234112		
Full Name, Mailing Address & ZIP Code of Each Payee	Purpose of Expenditure	Date (month, day, year)	Amount	Name of Federal Candidate supported or opposed by the expenditure & office sought	
Greenwich Time 20 E. Elm St. Greenwich, CT 06836	Political Ad.	11/5/88	864.00	Dukakis/Bentsen	
				☒ Support ☐ Oppose	
1.	"	11/7/88	1,134	1.	
				☒ Support ☐ Oppose	
2.					
				☐ Support ☐ Oppose	
3.					
				☐ Support ☐ Oppose	
4.					
				☐ Support ☐ Oppose	
5.					
				☐ Support ☐ Oppose	
6.					
				☐ Support ☐ Oppose	

(a) SUBTOTAL of Itemized Independent Expenditures

\$ 1,998

(b) SUBTOTAL of Unitemized Independent Expenditures

\$

(c) TOTAL Independent Expenditures

\$ 1,998

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, concert with, or at the request or suggestion of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures did not involve the financing of dissemination, distribution, or republication in whole or in part of any campaign materials prepared by the candidate, his campaign committee, or their agent.

R. Champion Ward Nov. 3, 1988
Signature Date

Subscribed and sworn to before me this 3rd day of

November, 1988

My Commission expires

Shirley L. Carson
NOTARY PUBLIC

REPORT OF RECEIPTS AND DISBURSEMENTS

For Official Use of an Authorized Committee
(Summary Page)

St. Hartford

1. NAME OF COMMITTEE (in full)

"Greenwich Presidential Issues Campaign"

ADDRESS (number and street) ☐ Check if different than previously reported

31 Strickland Rd.

CITY, STATE and ZIP CODE

Cos Cob, CT 06807

2. FEC IDENTIFICATION NUMBER

C00234112

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)

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 Oct. 11 through Nov. 7

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 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 (Itemize all on Schedule C and/or Schedule D)

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

COLUMN A
This Period

COLUMN B
Calendar Year-to-Date

\$

\$ None

\$ 4,385.00

\$

\$ 4,385.00

\$ None

\$ None

\$ None

For further information contact:
Federal Election Commission
999 E Street, NW
Washington, DC 20463
Toll Free 800-424-9530
Local 202-376-3120

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

F. Champion Ward

Signature of Treasurer

F. Champion Ward

Date

Nov. 16, 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.

STATE OF CONNECTICUT

COUNTY OF FAIRFIELD

SUBSCRIBED AND SWORN TO BEFORE ME

Jeanette Zehalka
JEANETTE ZEHALKA
NOTARY PUBLIC
MY COMMISSION EXPIRES MARCH 31, 1992

FEC FORM 3X

(revised 4/87)

DETAILED SUMMARY PAGE

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

C. Hartford

C 00234112

Name of Committee (in full) "Greenwich Presidential Issues Campaign"		Report Covering the Period From: Oct. 11 To: Nov. 8	
		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)	4,385.00		11(a)(i)
(ii) Unitemized			11(a)(ii)
(iii) Total of contributions from individuals	4,385.00		11(a)(iii)
(b) Political Party Committees			11(b)
(c) Other Political Committees (such as PACs)			11(c)
(d) TOTAL CONTRIBUTIONS (add 11(a)(iii), (b), and (c))	4,385.00		11(d)
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES			12
13. ALL LOANS RECEIVED			13
14. LOAN REPAYMENTS RECEIVED			14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)			15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			16
17. OTHER RECEIPTS (Dividends, Interest, etc.)			17
18. TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)	4,385.00		18
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES	47.00		19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES			20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			21
22. INDEPENDENT EXPENDITURES (use Schedule E)	4,338.00		22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (use Schedule F)			23
24. LOAN REPAYMENTS MADE			24
25. LOANS MADE			25
26. REFUNDS OF CONTRIBUTIONS TO:			
(a) Individuals/Persons Other Than Political Committees			26(a)
(b) Political Party Committees			26(b)
(c) Other Political Committees (such as PACs)			26(c)
(d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c))			26(d)
27. OTHER DISBURSEMENTS			27
28. TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	4,385.00		28
III. NET CONTRIBUTIONS/OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans) (from Line 11(d))	4,385.00		29
30. TOTAL CONTRIBUTION REFUNDS (from Line 26(d))			30
31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from 29)	4,385.00		31
32. TOTAL OPERATING EXPENDITURES (from Line 19)	47.00		32
33. OFFSETS TO OPERATING EXPENDITURES (from Line 15)			33
34. NET OPERATING EXPENDITURES (subtract Line 33 from 32)	47.00		34

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NAME OF COMMITTEE (in Full)

Greenwich Presidential Issues Campaign, '88 C.O.O. 234112
"not an authorized committee"

A. Full Name, Mailing Address and ZIP Code Mary Lou Woods 21 Grove Lane Greenwich, Conn. 06831 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer N. Hoberman architect Occupation Exec. Asst. Aggregate Year-to-Date > \$ 50.00	Date (month, day, year) 10/18/88	Amount of Each Receipt this Period \$ 50.00
B. Full Name, Mailing Address and ZIP Code Lilly M. Hampton 48 Lockwood Avenue Old Greenwich, Conn. 06870 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer self-employed Occupation artist & travel consultant Aggregate Year-to-Date > \$ 25.00	Date (month, day, year) 10/17/88	Amount of Each Receipt this Period \$ 25.00
C. Full Name, Mailing Address and ZIP Code Daira B. Ward 31 Strickland Road Cos Cob, Conn. 06870 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer — Occupation homemaker Aggregate Year-to-Date > \$ 50.00	Date (month, day, year) 10/20/88	Amount of Each Receipt this Period \$ 50.00
D. Full Name, Mailing Address and ZIP Code Alma Rutgers 2 Thistle Lane Greenwich, Conn. 06831 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer — Occupation Homemaker Aggregate Year-to-Date > \$ 50.00	Date (month, day, year) 10/20/88	Amount of Each Receipt this Period \$ 50.00
E. Full Name, Mailing Address and ZIP Code Anthony Hayden 21 Mohawk Lane Greenwich, Conn. 06830 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer self-employed Occupation driver, teacher Aggregate Year-to-Date > \$ 5.00	Date (month, day, year) 10/25/88 currency	Amount of Each Receipt this Period \$ 5.00
F. Full Name, Mailing Address and ZIP Code Edward T. Krumeich 4 Lafayette Court Greenwich, Conn. 06830 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer self-employed Occupation Attorney Aggregate Year-to-Date > \$ 40.00	Date (month, day, year) 10/25/88 currency	Amount of Each Receipt this Period \$ 40.00
G. Full Name, Mailing Address and ZIP Code Alberta Lennon 27 Bonwit Road Greenwich, Conn. 06830 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Raveis Associates Occupation real estate agent Homemaker Aggregate Year-to-Date > \$ 25.00	Date (month, day, year) 10/25/88 currency	Amount of Each Receipt this Period \$ 25.00
TOTAL of Receipts This Page (optional)			245.00
For This Period (last page this line number only)			

CHEDULE A

ITEMIZED RECEIPTS

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

PAGE 4 OF 14
FOR LINE NUMBER 12

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NAME OF COMMITTEE (in Full)

Greenwich Presidential Issues Campaign '88
"not an authorized committee"

00234112

A. Full Name, Mailing Address and ZIP Code Richard Deutsch 50 Cherry Valley Road Greenwich, Conn. 06831 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer — Occupation Ret. Exec. Aggregate Year-to-Date > \$ 50.00	Date (month, day, year) 10/18/88	Amount of Each Receipt this Period \$50.00
B. Full Name, Mailing Address and ZIP Code Abby Gross 20 H: 11 Road Greenwich, Conn. 06830 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer — Occupation Homemaker Aggregate Year-to-Date > \$ 35.00	Date (month, day, year) 10/18/88	Amount of Each Receipt this Period \$35.00
C. Full Name, Mailing Address and ZIP Code William Ross 32 Welwyn Road Riverside, Conn. 06878 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer — Occupation Retired Aggregate Year-to-Date > \$ 15.00	Date (month, day, year) 10/19/88	Amount of Each Receipt this Period \$15.00
D. Full Name, Mailing Address and ZIP Code Cornelia D. Jahncke 420 W. Lyon Farm Drive Greenwich, Conn. 06830 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer — Occupation Homemaker Aggregate Year-to-Date > \$ 25.00	Date (month, day, year) 10/18/88	Amount of Each Receipt this Period \$25.00
E. Full Name, Mailing Address and ZIP Code Jane E. Milliken 122 Cedar Cliff Riverside, Conn. 06878 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer self-employed Occupation Film producer Aggregate Year-to-Date > \$ 50.00	Date (month, day, year) 10/18/88	Amount of Each Receipt this Period \$50.00
F. Full Name, Mailing Address and ZIP Code Frederick D. Boyden 24 Richmond Hill Ave. Stamford, Ct. 06904-2117 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Louis Dreyfus Corp. Occupation Attorney Aggregate Year-to-Date > \$ 50.00	Date (month, day, year) 10/18/88	Amount of Each Receipt this Period \$50.00
G. Full Name, Mailing Address and ZIP Code Merrilee W. Harnick 207 Shore Road Old Greenwich, Conn. 06870 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer self-employed Occupation Realtor Aggregate Year-to-Date > \$ 100.00	Date (month, day, year) 10/19/88	Amount of Each Receipt this Period \$100.00

TOTAL of Receipts This Page (optional)

325.00

TAL This Period (last page this line number only)

SCHEDULE A.

ITEMIZED RECEIPTS

Use separate schedule(s)
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PAGE 5 OF 11
FOR LINE NUMBER 18

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NAME OF COMMITTEE (in Full)

Greenwich Presidential Issues Campaign, '88
not an authorized committee

C00234112

A. Full Name, Mailing Address and ZIP Code Adele Tertell 44 Blaney Lane Old Greenwich, Conn. 06870 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Self-employed "Community Video Productions" Occupation Video Producer Aggregate Year-to-Date > \$ 100.00	Date (month, day, year) 10/20/88	Amount of Each Receipt this Period \$100.00
B. Full Name, Mailing Address and ZIP Code Mr. T. Abell 25 Tower Road Riverside, Conn. 06878 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer — Occupation Retired Homemaker Aggregate Year-to-Date > \$ 35.00	Date (month, day, year) 10/17/88	Amount of Each Receipt this Period \$35.00
C. Full Name, Mailing Address and ZIP Code Barbara Tachman 83 Orchard Street Cos Cob, Conn. 06807 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Self-employed Occupation Historian Aggregate Year-to-Date > \$ 50.00	Date (month, day, year) 10/18/88	Amount of Each Receipt this Period \$50.00
D. Full Name, Mailing Address and ZIP Code Diana Harrington 48 Gregory Road Cos Cob, Conn. 06807 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Self-employed Occupation Consultant Aggregate Year-to-Date > \$ 25.00	Date (month, day, year) 10/19/88	Amount of Each Receipt this Period \$25.00
E. Full Name, Mailing Address and ZIP Code Mahlon Perkins, Jr. 188 Cognewaugh Cos Cob, Conn. 06807 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer — Occupation Ret. attny. Aggregate Year-to-Date > \$ 25.00	Date (month, day, year) 10/19/88	Amount of Each Receipt this Period \$25.00
F. Full Name, Mailing Address and ZIP Code Judith G. Rein 444 Cognewaugh Road Cos Cob, Ct. 06807 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer — Occupation Homemaker Aggregate Year-to-Date > \$ 100.00	Date (month, day, year) 10/14/88	Amount of Each Receipt this Period \$100.00
G. Full Name, Mailing Address and ZIP Code Thomas G. Joeman 58 N. Old Stone Rd. Cos Cob, Ct. 06807 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Self-employed Occupation Opera Singer Aggregate Year-to-Date > \$ 5.00	Date (month, day, year) 10/13/88	Amount of Each Receipt this Period \$5.00

SUBTOTAL of Receipts This Page (optional)

340

TOTAL This Period (last page this line number only)

SCHEDULE A

ITEMIZED RECEIPTS

separate schedule(s)
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Detailed Summary Page

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FOR LINE NUMBER 18

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NAME OF COMMITTEE (in Full)

Greenwich Presidential Issues Campaign, '88
not an authorized committee

C00234112

A. Full Name, Mailing Address and ZIP Code Janet F. Gleason 11 Pleasant View Place Old Greenwich, Conn. 06870 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer — Occupation Homemaker Aggregate Year-to-Date > \$ 25.00	Date (month, day, year) 10/13/88	Amount of Each Receipt this Period \$25.00
B. Full Name, Mailing Address and ZIP Code Betty P. Woodman 58 N. Old Stone Bridge Rd. Cos Cob, Conn. 06807 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Self-employed Occupation Community worker Aggregate Year-to-Date > \$ 25.00	Date (month, day, year) 10/13/88	Amount of Each Receipt this Period \$ 25.00
C. Full Name, Mailing Address and ZIP Code Ivan G. Herman P.O. Box 678 Greenwich, Conn. 06836 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Ivan Herman Co. Self-employed Occupation Business Aggregate Year-to-Date > \$ 100.00	Date (month, day, year) 10/13/88	Amount of Each Receipt this Period \$100.00
D. Full Name, Mailing Address and ZIP Code Nancy S. Bernard 33 Byram Drive Belle Haven, Greenwich, Ct. 06830 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Self-employed Occupation Teacher Aggregate Year-to-Date > \$ 100.00	Date (month, day, year) 10/12/88	Amount of Each Receipt this Period \$100.00
E. Full Name, Mailing Address and ZIP Code Susan Cohen 7 Perkely Lane Riverside, Ct. 06878 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Self-employed Occupation Landscape designer Aggregate Year-to-Date > \$ 100.00	Date (month, day, year) 10/13/88	Amount of Each Receipt this Period \$100.00
F. Full Name, Mailing Address and ZIP Code Betty Hauptman Carrage Road Cos Cob, Ct. 06807 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Greenwich Library Occupation Development officer Aggregate Year-to-Date > \$ 50.00	Date (month, day, year) 10/12/88	Amount of Each Receipt this Period \$50.00
G. Full Name, Mailing Address and ZIP Code Louis Luehrs 363 Cognewaugh Rd. Cos Cob, Ct. 06807 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer H.I.S. Sportswear Occupation Executive Aggregate Year-to-Date > \$ 95.00	Date (month, day, year) 10/15/88	Amount of Each Receipt this Period \$95.00

SUBTOTAL of Receipts This Page (optional)

495.00

TOTAL This Period (last page this line number only)

SCHEDULE A

ITEMIZED RECEIPTS

separate schedule(s)
for each category of the
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FOR LINE NUMBER 18

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NAME OF COMMITTEE (in Full)

Greenwich Presidential Issues Campaign '88 C00234112
"not an authorized committee"

A. Full Name, Mailing Address and ZIP Code Nanette B. Pugh 68 Otter Rock Drive Greenwich, Conn. 06830 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Greenwich Family Center Occupation <u>Clinical Sec. Worker</u> Aggregate Year-to-Date > \$ 50.00	Date (month, day, year) 10/13/88	Amount of Each Receipt this Period \$50.00
B. Full Name, Mailing Address and ZIP Code Irene Senter Cognewaugh Rd. Cos Cob, Ct. 06807 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer — Occupation <u>Retired</u> Aggregate Year-to-Date > \$ 50.00	Date (month, day, year) 10/13/88 10/13/88	Amount of Each Receipt this Period \$25.00 \$25.00
C. Full Name, Mailing Address and ZIP Code Mary Sullivan 66 Indian Head Road Riverside, Conn. 06878 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer — Occupation <u>Homemaker</u> Aggregate Year-to-Date > \$ 50.00	Date (month, day, year) 10/18/88	Amount of Each Receipt this Period \$50.00
D. Full Name, Mailing Address and ZIP Code Gwen Bylinsky 32 Chapel Lane Riverside Ct. 06878 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer — Occupation <u>Homemaker</u> Aggregate Year-to-Date > \$ 25.00	Date (month, day, year) 10/17/88	Amount of Each Receipt this Period \$25.00
E. Full Name, Mailing Address and ZIP Code W. Scott Bartlett 400 N. Maple Ave. Greenwich, Ct. 06830 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer — Occupation <u>Retired</u> Aggregate Year-to-Date > \$ 50.00	Date (month, day, year) 10/14/88	Amount of Each Receipt this Period \$50.00
F. Full Name, Mailing Address and ZIP Code Ralph Pomerance P.O. Box 112 Cos Cob, Ct. 06807 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer — Occupation <u>Retired</u> Aggregate Year-to-Date > \$ 50.00	Date (month, day, year) 10/17/88	Amount of Each Receipt this Period \$50.00
G. Full Name, Mailing Address and ZIP Code Mary M. Hagarty 38 Shore Road Old Greenwich Conn. 06870 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer — Occupation <u>Homemaker</u> Aggregate Year-to-Date > \$ 100.00	Date (month, day, year) 10/16/88	Amount of Each Receipt this Period \$100.00

SUBTOTAL of Receipts This Page (optional)

375.00

TOTAL This Period (last page this line number only)

SCHEDULE A

ITEMIZED RECEIPTS

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

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FOR LINE NUMBER 18

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NAME OF COMMITTEE (in Full)

Greenwich Presidential Issues Campaign, '88
not an authorized committee

C00234112

A. Full Name, Mailing Address and ZIP Code Jeanne M. Holte 50 Cat Rock Road Cos Cob, Conn. 10507 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Self-employed Occupation Landscape designer Aggregate Year-to-Date > \$10.00	Date (month, day, year) 10/15/88	Amount of Each Receipt this Period \$10.00
B. Full Name, Mailing Address and ZIP Code Angelo J. Pucci 30 Byram Shore Road Greenwich, Ct. 06830 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Partridge & Rockwell Occupation Owner Aggregate Year-to-Date > \$200.00	Date (month, day, year) 10/25/88	Amount of Each Receipt this Period \$200.00
C. Full Name, Mailing Address and ZIP Code Jacelyn B. Booth 19 Grand Ave. Old Greenwich, Conn. 06870 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Country Day School Greenwich, CT Occupation Teacher Aggregate Year-to-Date > \$25.00	Date (month, day, year) 10/20/88	Amount of Each Receipt this Period \$25.00
D. Full Name, Mailing Address and ZIP Code Carol N. Dixon 382 Sound Beach Ave. Old Greenwich, Ct. 06870 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Greenwich Academy Occupation Teacher Aggregate Year-to-Date > \$25.00	Date (month, day, year) 10/20/88	Amount of Each Receipt this Period \$25.00
E. Full Name, Mailing Address and ZIP Code Stephen Fuzesi, Jr. 3 Castle Court Greenwich, Conn. 06830 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Stamford Capital Group Occupation Attorney Aggregate Year-to-Date > \$25.00	Date (month, day, year) 10/18/88	Amount of Each Receipt this Period \$25.00
F. Full Name, Mailing Address and ZIP Code Richard U. Bergstrasser 200 Old Church Road Greenwich, Conn. 06830 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer IBM Occupation Executive Aggregate Year-to-Date > \$100.00	Date (month, day, year) 10/14/88	Amount of Each Receipt this Period \$100.00
G. Full Name, Mailing Address and ZIP Code Renee Holt Bigler 40 Doubling Road Greenwich, Conn. 06830 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer — Occupation homemaker Aggregate Year-to-Date > \$200.00	Date (month, day, year) 10/13/88	Amount of Each Receipt this Period \$200.00

SUBTOTAL of Receipts This Page (optional)

585.

TOTAL This Period (last page this line number only)

SCHEDULE A

ITEMIZED RECEIPTS

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

PAGE 9 OF 14
FOR LINE NUMBER 12

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NAME OF COMMITTEE (in Full)

Greenwich Presidential Issues Campaign, '88
"not an authorized committee"

C00234112

A. Full Name, Mailing Address and ZIP Code D. J. Kirk 5 Boulder Brook Road Greenwich, Ct. 06830 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Columbia University Occupation Professor of business Aggregate Year-to-Date > \$50.00	Date (month, day, year) 10/15/88	Amount of Each Receipt this Period \$ 50.00
B. Full Name, Mailing Address and ZIP Code Leo P. Annobaldi, Jr. 28 Perkins Road Greenwich, Ct. 06830 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer self-employed Occupation business Aggregate Year-to-Date > \$ 200	Date (month, day, year) 10/20/88	Amount of Each Receipt this Period \$ 200.00
C. Full Name, Mailing Address and ZIP Code George E. Twine 40 Cassidy Street Greenwich, Conn. 06830 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer — Occupation Retired Aggregate Year-to-Date > \$ 20.00	Date (month, day, year) 10/23/88	Amount of Each Receipt this Period \$ 20.00
D. Full Name, Mailing Address and ZIP Code Marjorie M. Bacon 58 Winthrop Drive Riverside, Conn. 06878 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer free lance Occupation Copy editor Aggregate Year-to-Date > \$ 25.00	Date (month, day, year) 10/21/88	Amount of Each Receipt this Period \$ 25.00
E. Full Name, Mailing Address and ZIP Code Nan L. Markel Sterling Rd. Greenwich, CT 06830 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer — Occupation homemaker Aggregate Year-to-Date > \$ 25.00	Date (month, day, year) 10/24/88	Amount of Each Receipt this Period \$ 25.00
F. Full Name, Mailing Address and ZIP Code Harrison B.W. Hoffman 519 Stanwich Road Greenwich, Conn. 06830 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer — Occupation Retired teacher Aggregate Year-to-Date > \$ 50.00	Date (month, day, year) 10/23/88	Amount of Each Receipt this Period \$ 50.00
G. Full Name, Mailing Address and ZIP Code Seymour Polansky 72 Florence Road Riverside, Conn. 06878 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Greenwich Public Schools Occupation teacher Aggregate Year-to-Date > \$25.00	Date (month, day, year) 10/23/88	Amount of Each Receipt this Period \$ 25.00

SUBTOTAL of Receipts This Page (optional)

395

TOTAL This Period (last page this line number only)

SCHEDULE A

ITEMIZED RECEIPTS

Separate schedule(s)
for each category of the
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FOR LINE NUMBER 18

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NAME OF COMMITTEE (in Full)

Greenwich Presidential Issues Campaign, '88 C00234112
"not an authorized committee"

A. Full Name, Mailing Address and ZIP Code Hermine F. Aborn 46 Wilshire Road Greenwich, Ct. 06831 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Occupation Homemaker Aggregate Year-to-Date > \$ 10.00	Date (month, day, year) 10/23/88	Amount of Each Receipt this Period \$ 10.00
B. Full Name, Mailing Address and ZIP Code Eugene H. Blanche 27 Meadow Wood Drive Greenwich, Ct. 06830 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Occupation Retired executive Aggregate Year-to-Date > \$ 25.00	Date (month, day, year) 10/20/88	Amount of Each Receipt this Period \$ 25.00
C. Full Name, Mailing Address and ZIP Code E. Porcher Hester 24 Maher Ave. Greenwich, Conn. 06830 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer unemployed Occupation attorney Aggregate Year-to-Date > \$ 25.00	Date (month, day, year) 10/19/88	Amount of Each Receipt this Period \$ 25.00
D. Full Name, Mailing Address and ZIP Code Jane G. Hall 509 W. Lyon Farm Greenwich, Ct. 06830 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer self-employed Occupation artist Aggregate Year-to-Date > \$ 30.00	Date (month, day, year) 10/19/88	Amount of Each Receipt this Period \$ 30.00
E. Full Name, Mailing Address and ZIP Code W. Pyke Johnson, Jr. 5014 Clubhouse Rd. Old Greenwich, Conn. 06870 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Retired editor Aggregate Year-to-Date > \$ 25.00	Date (month, day, year) 10/12/88	Amount of Each Receipt this Period \$ 25.00
F. Full Name, Mailing Address and ZIP Code Miriam D. Koye 35 Sunshine Ave. Riverside, Conn. 06878 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Occupation Homemaker Aggregate Year-to-Date > \$ 25.00	Date (month, day, year) 10/29/88	Amount of Each Receipt this Period \$ 25.00
G. Full Name, Mailing Address and ZIP Code Rose Fina 20 Hervey Street Greenwich, Ct. 06830 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Occupation Homemaker Aggregate Year-to-Date > \$ 10.00	Date (month, day, year) 10/21/88	Amount of Each Receipt this Period \$ 10.00

SUBTOTAL of Receipts This Page (optional)

150

TOTAL This Period (last page this line number only)

SCHEDULE A

RECEIVED RECEIPTS

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

 PAGE OF
11 14
FOR LINE NUMBER
18

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)

 Greenwich Presidential Issues Campaign
not an authorized committee

C00234112

A. Full Name, Mailing Address and ZIP Code Edward M. Lamont 37 Montgomery Lane Greenwich, Ct. 06830 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Lamont TV System Occupation Cable TV Executive Aggregate Year-to-Date > \$ 35.00	Date (month, day, year) 10/11/88	Amount of Each Receipt this Period \$ 35.00
B. Full Name, Mailing Address and ZIP Code Edith B. Fehr 294 Round Hill Rd. Greenwich, Conn. 06831 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Occupation Homemaker Aggregate Year-to-Date > \$ 25.00	Date (month, day, year) 10/20/88	Amount of Each Receipt this Period \$ 25.00
C. Full Name, Mailing Address and ZIP Code George J. Lutz 112 Patterson Ave. Greenwich, Ct. 06830 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Occupation Ret. executive Aggregate Year-to-Date > \$ 30.00	Date (month, day, year) 10/19/88	Amount of Each Receipt this Period \$ 30.00
D. Full Name, Mailing Address and ZIP Code Jo Ubogy 319 Cognewough Road Cos Cob, Conn. 06807 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Occupation Sculptor Aggregate Year-to-Date > \$ 50.00	Date (month, day, year) 10/12/88	Amount of Each Receipt this Period \$ 50.00
E. Full Name, Mailing Address and ZIP Code Adelaide R. Muntenbeck 20 Ballwood Road Old Greenwich, Conn. 06870 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Occupation Homemaker Aggregate Year-to-Date > \$ 50.00	Date (month, day, year) 10/20/88	Amount of Each Receipt this Period \$ 50.00
F. Full Name, Mailing Address and ZIP Code Shirley Esterman 743 Lake Ave. Greenwich, Conn. 06830 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Occupation Homemaker Aggregate Year-to-Date > \$ 25.00	Date (month, day, year) 10/24/88	Amount of Each Receipt this Period \$ 25.00
G. Full Name, Mailing Address and ZIP Code Frank Furmark 1 Hendric Drive Old Greenwich, Ct. 06870 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Fox, Wells, and Co. Occupation executive Aggregate Year-to-Date > \$ 25.00	Date (month, day, year) 10/27/88	Amount of Each Receipt this Period \$ 25.00

SUBTOTAL of Receipts This Page (optional)

24.0

TOTAL This Period (last page this line number only)

SCHEDULE A

ITEMIZED RECEIPTS

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

 PAGE 12 OF 14
FOR LINE NUMBER 12

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)

 Greenwich Presidential Issues Campaign
not an authorized committee

C00234112

A. Full Name, Mailing Address and ZIP Code Jara Burnett 299 Riverside Ave. Riverside, Ct. 06878	Name of Employer self-employed	Date (month, day, year) money order undated Serial no.: 39316599325 -late Oct, 88	Amount of Each Receipt this Period \$50.00
Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Occupation Community Worker	Aggregate Year-to-Date > \$50.00	
B. Full Name, Mailing Address and ZIP Code Barbara F. Hegarty Mead Point Greenwich, Conn. 06830	Name of Employer Occupation Homemaker	Date (month, day, year) 10/15/88	Amount of Each Receipt this Period \$150.00
Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Aggregate Year-to-Date > \$150.00		
C. Full Name, Mailing Address and ZIP Code Diane C. Clark 26 Widgeon Way Greenwich, Ct. 06830	Name of Employer Occupation Homemaker	Date (month, day, year) 10/17/88	Amount of Each Receipt this Period \$20.00
Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Aggregate Year-to-Date > \$20.00		
D. Full Name, Mailing Address and ZIP Code Martin W. Tomberg S. Hooker Lane Cos Cob, Conn. 06807	Name of Employer Radclab, Stamford	Date (month, day, year) 10/18/88	Amount of Each Receipt this Period \$100.00
Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Occupation Executive	Aggregate Year-to-Date > \$100.00	
E. Full Name, Mailing Address and ZIP Code Caroline Anderson 138 Clapboard Ridge Road Greenwich, Ct. 06830	Name of Employer self employed	Date (month, day, year) 10/25/88	Amount of Each Receipt this Period \$25.00
Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Occupation decorator; real estate agent Homemaker	Aggregate Year-to-Date > \$25.00	
F. Full Name, Mailing Address and ZIP Code Mary Bonsal 30 Hendrie Ave. Riverside, Conn. 06878	Name of Employer Occupation Homemaker	Date (month, day, year) 10/25/88	Amount of Each Receipt this Period \$25.00
Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Aggregate Year-to-Date > \$25.00		
G. Full Name, Mailing Address and ZIP Code Amy Fleischman 333 Sound Beach Ave. Greenwich, Conn.	Name of Employer Occupation Homemaker	Date (month, day, year) 10/25/88	Amount of Each Receipt this Period \$25.00
Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Aggregate Year-to-Date > \$25.00		

SUBTOTAL of Receipts This Page (optional)

395

TOTAL This Period (last page this line number only)

SCHEDULE A

ITEMIZED RECEIPTS

 Attach schedule(s)
or item category of the
Detailed Summary Page

 PAGE OF
13 14
FOR LINE NUMBER
18

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)

 Greenwich Presidential Issues Campaign '88
"not an authorized committee"

C00234112

A. Full Name, Mailing Address and ZIP Code Peggy Kavounas 47 Lafayette Place Greenwich, Ct. 06830 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Occupation homemaker Aggregate Year-to-Date > \$ 25.00	Date (month, day, year) currency 10/29/88	Amount of Each Receipt this Period 425.00
B. Full Name, Mailing Address and ZIP Code Robert O'Neill 55 Northfield Greenwich, Conn. 06830 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Occupation retired Aggregate Year-to-Date > \$ 25.00	Date (month, day, year) 10/25/88	Amount of Each Receipt this Period 425.00
C. Full Name, Mailing Address and ZIP Code Mary Blackwell address unknown Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$ 10.00	Date (month, day, year) currency late Oct. 88	Amount of Each Receipt this Period 410.00
D. Full Name, Mailing Address and ZIP Code F. Champion Ward 31 Strickland Rd. Cos Cob, Ct. Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation retired ex Aggregate Year-to-Date > \$ 10.00	Date (month, day, year) 11/2/88 currency	Amount of Each Receipt this Period 410.00
E. Full Name, Mailing Address and ZIP Code Maurice Hunt 4 Ridgebrook Road Greenwich, Ct. 06830 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Anderson Associates Occupation real estate agent Aggregate Year-to-Date > \$ 50.00	Date (month, day, year) 10/21/88	Amount of Each Receipt this Period 450.00
F. Full Name, Mailing Address and ZIP Code Francis X. Lennon, Jr. 50 Valleywood Rd. Cos Cob, Ct. 06807 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer self-employed Occupation attorney Aggregate Year-to-Date > \$ 25	Date (month, day, year) 10/20/88	Amount of Each Receipt this Period 425.00
G. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period

SUBTOTAL of Receipts This Page (optional)

\$ 145.00

TOTAL This Period (last page this line number only)

SCHEDULE A

ITEMIZED RECEIPTS

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

PAGE 14 OF 14
FOR LINE NUMBER 18

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)

Greenwich, Presidential Issues Campaign, '98
not an authorized committee

C 00234112

A. Full Name, Mailing Address and ZIP Code Norman Hoberman Hunting Ridge Road Greenwich, Ct. 06830 Receipt For: ☐ Primary ☒ General ☐ Other (specify):	Name of Employer Self-employed Occupation architect Aggregate Year-to-Date > \$ 50.00	Date (month, day, year) 10/20/88	Amount of Each Receipt this Period \$ 50.00
B. Full Name, Mailing Address and ZIP Code Norma B. Green 200 Weaver St. Greenwich, Ct. 06830 Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer housewife Occupation Aggregate Year-to-Date > \$ 10.00	Date (month, day, year) 10/21/88	Amount of Each Receipt this Period \$ 10.00
C. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
D. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
E. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
F. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
G. Full Name, Mailing Address and ZIP Code Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period

SUBTOTAL of Receipts This Page (optional)

\$ 60.00

TOTAL This Period (last page this line number only)

\$ 4385.00

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

SENSITIVE

GENERAL COUNSEL'S REPORT

MUR 2776
DATE COMPLAINT RECEIVED
BY OGC: 11/7/88
DATE OF NOTIFICATION TO
RESPONDENTS: 11/9/88
STAFF MEMBER: Frania
Monarski

COMPLAINANTS: Elizabeth Heminway
Lawrence J. Halloran

RESPONDENTS: Greenwich Presidential Issues
Campaign '88
F. Champion Ward, as treasurer

RELEVANT STATUTES: 2 U.S.C. § 433
2 U.S.C. § 434(c)
2 U.S.C. § 441d(a)(3)

INTERNAL REPORTS CHECKED: Disclosure Indexes

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

On November 7, 1988, the Commission received a complaint from Elizabeth Heminway and her attorney, Lawrence J. Halloran, (the "Complainants") alleging that the Greenwich Presidential Issues Campaign '88 (the "Committee") and F. Champion Ward, as treasurer, violated 2 U.S.C. § 434(c) by failing to report within 24 hours an independent expenditure aggregating over \$1,000 made after the 20th day, but more than 24 hours before the election. Moreover, the Complainants contend that the Committee failed to include a disclaimer indicating whether its advertisement was authorized by the candidates or their authorized committee in violation of 2 U.S.C. § 441d(a)(3) and

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11 C.F.R. § 110.11(a)(1)(iii). On November 21, 1988, F. Champion Ward, treasurer of the Committee submitted a response to the Commission.

II. FACTUAL AND LEGAL ANALYSIS

The Federal Election Campaign Act of 1971, as amended (the Act") provides that an organization or group of persons becomes a political committee when it receives contributions or makes expenditures aggregating in excess of \$1,000 per calendar year. 2 U.S.C. § 431(4). Once the organization exceeds the \$1,000 threshold, it must file a Statement of Organization with the Commission within ten days after qualifying as a political committee. 2 U.S.C. § 433. Pursuant to the Act, the treasurer of a political committee is required to file periodic reports of the receipts and disbursements of the committee. 2 U.S.C. § 434. The Committee in this matter is registered with the Connecticut Secretary of State as a non-connected committee organized to support the candidacy of the Democratic nominees for President and Vice President in the 1988 election. In his response, F. Champion Ward, the treasurer of the Committee, included a letter, dated October 31, 1988, submitted to the Commission, explaining that he mistakenly filed the Statement of Organization with the Office of the Secretary of State of Connecticut instead of with the Commission. The Committee registered with the Commission on November 2, 1988. In its 1988 Pre-General Report, however, the Committee reported a \$1,134 disbursement to Southern Connecticut Newspapers, Inc. on October 22, 1988, which placed it over the \$1,000 threshold for

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qualifying as a political committee. Therefore, the Committee is in violation of 2 U.S.C. § 433 for failing to register as a political committee within the required ten day time period.

The Act and the Commission Regulations define an independent expenditure as an expenditure by a person expressly advocating the election or defeat of a clearly identified candidate which is not made with the cooperation or prior consent of, or consultation with or at the request or suggestion of a candidate, or any agent or authorized committee of the candidate. 2 U.S.C. § 431(17) and 11 C.F.R. § 109.1(a). For purposes of this section, the term "person" includes a partnership, committee, association, or any organization or group of persons. 11 C.F.R. § 109.1(b)(1). Commission Regulations indicate that the phrase "expressly advocating" refers to a communication which includes expressions such as "vote for", "elect" and "support". 11 C.F.R. § 109.1(b)(2). Furthermore, the Regulations provide that "clearly identified candidate" means that the name or photograph of the candidate appears or the identity of the candidate is otherwise apparent by unambiguous reference. 11 C.F.R. § 109.1(b)(3). Between October 26, 1988 and October 28, 1988, the Committee placed three advertisements in the Greenwich Time, a daily newspaper in southwestern Connecticut, expressly advocating the election of Democratic Presidential and Vice Presidential candidates, Michael Dukakis and Lloyd Bentsen. The advertisements, which in aggregate cost \$1,134, included photographs of the Democratic nominees for President and Vice President and the statement, "We

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support Dukakis/Bentsen." Therefore, this advertisement falls within the definition of an independent expenditure.

The Act requires a committee, if it qualifies as a political committee, to report all independent expenditures pursuant to 2 U.S.C. § 434(b)(4)(H)(iii). Furthermore, any independent expenditure made by any person or political committee aggregating \$1,000 or more made after the 20th day, but more than 24 hours before the election, must be reported within 24 hours after the independent expenditure is made.

2 U.S.C. § 434(c)(2). In the instant matter, because the Committee placed the advertisement in the newspaper between October 26, 1988 and October 28, 1988, it was required to report these independent expenditures pursuant to 2 U.S.C. § 434(c)(2) (even if it qualified as a political committee under the Act) if their cost aggregated more than \$1,000. The cost of the three advertisements totaled \$1,134. On November 7, 1988, the Commission received two 24 hour contribution notices indicating that the Committee spent a total of \$3,204 for political advertising on behalf of the Dukakis/Bentsen campaign in the Greenwich Time and the Greenwich News on November 3, November 5 and November 7, 1988. However, the Committee failed to submit 24 hour contribution notices for the advertisements made between October 26 and October 28, 1988. On November 28, 1988, the Committee filed an amendment to its 1988 Pre-General Report, listing the independent expenditures made between October 26 and October 28, 1988 in the Greenwich Time on its Schedule E. Therefore, although the Committee did report the expenditures to

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the Commission in its Pre-General Report, it failed to file the required 24 hour contribution notices and, therefore, violated 2 U.S.C. § 434(c)(2).

The Act further requires that any expenditure for a communication which expressly advocates the election or defeat of a clearly identified candidate must state whether or not that communication was paid for or authorized by the candidate, an authorized political committee of the candidate, or its agents. 2 U.S.C. § 441d(a)(1) and (2). Moreover, if the communication is not authorized by the candidate, an authorized political committee or agents of the candidate, it must clearly state the name of the person who paid for the communication and indicate that it was not authorized by the candidate or the candidate's committee. 2 U.S.C. § 441d(a)(3). The advertisements in the Greenwich Time indicated that they were paid for by the Greenwich Presidential Issues Campaign '88 and F. Champion Ward, treasurer, however, they did not state whether or not they were authorized by the candidates or the Dukakis/Bentsen Committee, Inc. In his response, Ward indicated that he was unaware that the advertisements had to state whether or not they were authorized by the candidates or their committee. Since November 2, 1988, the Committee has placed the required disclaimer on its independent expenditures stating that the advertisements were not authorized by any candidate or candidate committee. Therefore, it appears that the Committee has corrected its violation of the Act by using the appropriate disclaimers on later political advertisements.

8 9 0 4 0 7 5 2 3 0 7

This Office recommends that the Commission find reason to believe that the Greenwich Presidential Issues Campaign '88 and F. Champion Ward, as treasurer, violated 2 U.S.C. § 433 by failing to register as a political committee within ten days of qualifying as such, 2 U.S.C. § 434(c)(2) by failing to report within 24 hours an independent expenditure aggregating over \$1,000 made after the 20th day, but more than 24 hours before the election and 2 U.S.C. § 441d(a)(3) by failing to include a disclaimer indicating whether the advertisement was authorized by the Democratic nominees for President and Vice President or their authorized committee.

III. RECOMMENDATIONS

1. Find reason to believe the Greenwich Presidential Issues Campaign '88 and F. Champion Ward, as treasurer violated 2 U.S.C. §§ 433, 434(c) and 441d(a)(3).

2. Approve the attached letter and Factual and Legal Analysis.

Lawrence M. Noble
General Counsel

Date

1/10/89

By:

Lois G. Lerner
Associate General Counsel

Attachments

1. Response to Complaint
2. Proposed letter and Factual and Legal Analysis

89040752308

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Greenwich Presidential Issues
Campaign '88
F. Champion Ward, as treasurer

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MUR 2776

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on January 17, 1989, the Commission decided by a vote of 6-0 to take the following actions in MUR 2776:

1. Find reason to believe the Greenwich Presidential Issues Campaign '88 and F. Champion Ward, as treasurer violated 2 U.S.C. §§ 433, 434(c) and 441d(a)(3).
2. Approve the letter and Factual and Legal Analysis, as recommended in the General Counsel's report signed January 10, 1989.

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

Attest:

January 17, 1989
Date

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

Received in the Office of Commission Secretary:	Wed., 1-11-89,	4:31
Circulated on 48 hour tally basis:	Thurs., 1-12-89,	11:00
Deadline for vote:	Tues., 1-17-89,	11:00

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 24, 1989

F. Champion Ward, Treasurer
Greenwich Presidential Issues
Campaign '88
31 Strickland Road
Cos Cob, CT 06807

RE: MUR 2776
Greenwich Presidential
Issues Campaign '88 and
F. Champion Ward, as
treasurer

Dear Mr. Ward:

On November 9, 1988, the Federal Election Commission notified the Greenwich Presidential Issues Campaign '88 ("Committee") and you, 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 forwarded to you at that time.

Upon further review of the allegations contained in the complaint, and information supplied by you, the Commission, on January 17, 1989, found that there is reason to believe the Committee and you, as treasurer, violated 2 U.S.C. §§ 433, 434(c) and 441d(a)(3), provisions of 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 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.

89040752310

F. Champion Ward
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, the Commission will not entertain requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent.

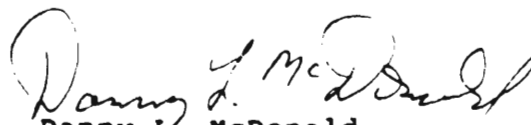
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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 matter to be made public.

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

Sincerely,


Danny L. McDonald
Chairman

Enclosures
Designation of Counsel Form
Factual & Legal Analysis

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

February 24, 1989

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

F. Champion Ward, Treasurer
Greenwich Presidential Issues
Campaign '88
31 Strickland Road
Cos Cob, CT 06807

RE: MUR 2776
Greenwich Presidential
Issues Campaign '88 and
F. Champion Ward, as
treasurer

Dear Mr. Ward:

On January 24, 1989, you were notified that the Federal Election Commission, on January 17, 1989, found reason to believe the Greenwich Presidential Issues Campaign '88 and you, as treasurer, violated 2 U.S.C. §§ 433, 434(c) and 441d(a)(3), provisions of the Act. Under the Act, you have an opportunity to demonstrate that no action should be taken against the Committee and you, as treasurer.

To date, you have not responded to the Commission's findings. Unless we receive a response from you within ten days, this Office will proceed to the next stage of the enforcement process.

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F. Champion Ward
Page 2

Should you have any questions, please contact Frania Monarski, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel



BY: Lois G. Lerner
Associate General Counsel

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F. CHAMPION WARD
31 STRICKLAND ROAD
COS COS. CONNECTICUT 06807

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RECEIVED
FEDERAL ELECTION COM
ADMINISTRATIVE DIV
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March 4, 1989

Frania Monarski, Esquire
Office of the General Counsel
Federal Election Commission
Washington, D.C. 20463

MUR 2776

Dear Ms. Monarski,

Today, I received a letter from the General Counsel of the Commission, dated February 24, 1989, that refers to a previous letter to me of January 24, 1989. That letter of January 24 has not reached me and is presumably lost. Without knowing the full content of the January 24 letter, let me reply at once and as best I can to its successor. The letter received today informs me for the second time that I am considered to be in

violation of certain sections of the Federal Elections Act of 1971. The first time I was so notified was in a letter dated November 9, 1988 (copy enclosed). I responded to that notice in a letter dated November 15, 1988, which I mailed* with enclosures, including my termination report, on November 17, with a copy of the summary to the Office of the Secretary of State in Hartford. I now conclude that my response never reached the Commission, or was deemed inadequate.

Fortunately, I retained a copy of my response and enclose copies of my copies with this letter. Given the shaky state of the mails between here and Washington, I am sending this letter and enclosures to you by certified mail. If I don't receive notice of receipt by Monday, March 14, I will call you. If, on your part, there are further matters we should discuss, please call me at (203) 661-5654 any day next week.

Sincerely,

F. Champion Ward

*Special delivery

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FEDERAL ELECTION COMMISSION
ADMINISTRATIVE DIVISION

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F. CHAMPION WARD
31 STRICKLAND ROAD
COS COS, CONNECTICUT 06807

March 13, 1989

Lawrence M. Noble, Esquire
General Counsel
Federal Election Commission
Washington, D.C. 20461

MUR 2776

Dear Mr. Noble,

Today, I have been advised by Ms. Frania Monarski that I should request entry into the stage called "pre-probable cause conciliation" in connection with MUR 2776 (Greenwich Presidential Issues Campaign '88). Please consider this letter such a request.

Ms. Monarski had the star-crossed file in this matter. I stand ready, of course, to answer any further questions as best I can.

I will await further word from your office.

Sincerely,

F. Champion Ward

c. Ms. Frania Monarski

Dear Mr. Monarski,
a second copy, separately mailed
to you, in view of the frailty of the mails.
Please let me know if Mr. Noble fails
to receive his copy. (I grow paranoid!)

FCW

89040752315

89 MAR 16 AM 10:30

RECEIVED
FEDERAL ELECTION COMMISSION
ADMINISTRATIVE DIVISION

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RECEIVED
FEDERAL ELECTION COMMISSION
ADMINISTRATIVE DIVISION

F. CHAMPION WARD
31 STRICKLAND ROAD
COS COS, CONNECTICUT 06807

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March 17, 1989 / *MW* 2776

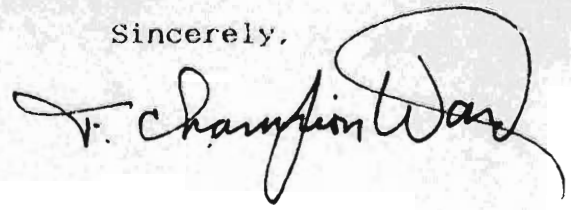
Dear Ms. Monarski,

I enclose copies of the latest letter from the Commission and of my reply. Perhaps my original termination report is reposing in a third office from which I'll be hearing in due course.

At any rate, I hope that I've done the right thing in referring Mr. Gibson to you.

Speaking of copies, I find that I didn't make a copy of my covering letter accompanying my mailing to Mr. Noble of March 13. I'd be grateful for a copy when time permits.

Sincerely,



Ms. Frania Monarski, Esq.
Office of the Chief Counsel
Federal Election Commission
Washington, D.C. 20463

RECEIVED
FEDERAL ELECTION COMMISSION
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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-7

Frederick Champion Ward, Treasurer
Greenwich Presidential Issues
Campaign
31 Strickland Road
Coscob, CT 06807

MAR 14 1989

Identification Number: C00234112

Reference: Year End Report (11/1/88-12/31/88)

Dear Mr. Ward:

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 Pat Sheppard on our toll-free number (800) 424-9530. Our local number is (202) 376-2480.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

39040752317

F. CHAMPION WARD
31 STRICKLAND ROAD
COS COS, CONNECTICUT 06807

March 17, 1989

C00234112

Dear Mr. Gibson
Federal Election Commission
Washington, D.C. 20463

Dear Mr. Gibson,

Your letter of March 14, which reached me today, adds still another chapter to a long and curious history. I sent in my termination report on November 17, 1988, but apparently it was not received or has been mislaid. I learned of this mishap months later, through a letter from the Chief Counsel dated February 24, 1989 and I sent a copy of my November report, together with copies of correspondence, to the Office of the Chief Counsel. Since then, on advice of Ms. Franja Monarski of that office, I have requested "conciliation."

May I suggest that your office confer with Ms. Monarski at this point? Otherwise, I fear that this matter will continue to proceed on two apparently separate tracks? Also, reproducing the November mailing takes time and money. I have found.

In the hope that this suggestion is acceptable to you, I am sending a copy of this letter and your letter of March 14 to Ms. Monarski.

Sincerely,

F. Champion Ward

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89 APR 13 AM 11:57

BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of	)	
	)	
Greenwich Presidential Issues	)	
Campaign '88 and F. Champion	)	MUR 2776
Ward, as treasurer	)	

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On January 17, 1989, the Federal Election Commission (the "Commission") found reason to believe that the Greenwich Presidential Issues Campaign '88 and F. Champion Ward, as treasurer, (the "Respondents") violated 2 U.S.C. § 433 by failing to file their Statement of Organization in a timely manner and 2 U.S.C. § 434(c) by failing to report certain independent expenditures made by the Respondents on October 26, 27, and 28, 1988, in a timely manner. Moreover, the Commission found reason to believe that the Respondents violated 2 U.S.C. § 441d(a)(3) by failing to include the appropriate disclaimer on their independent expenditures. In responding to the reason to believe finding, the Respondents, on March 4, 1989, resubmitted the material used to respond to the complaint and included a Termination Report.¹ On March 16, 1989, the Respondents sought resolution of this matter through the pre-probable cause conciliation process.

II. DISCUSSION OF CONCILIATION PROVISIONS AND CIVIL PENALTY

1. This Office forwarded a copy of the Termination Report to the Reports Analysis Division.

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. This Office, therefore, recommends that the Commission enter into conciliation with the Respondents and approve the proposed conciliation agreement.

III. RECOMMENDATIONS

1. Enter into conciliation with Greenwich Presidential Issues Campaign '88 and F. Champion Ward, as treasurer, prior to a finding of probable cause to believe.

2. Approve the attached proposed Conciliation Agreement and letter.

Lawrence M. Noble
General Counsel

April 13, 1989
Date

By: George F. Rishel
George F. Rishel
Acting Associate General Counsel

Attachments

1. Response
2. Request for Conciliation
3. Proposed Conciliation Agreement
4. Proposed letter

Staff Person: Frania Monarski

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Greenwich Presidential Issues) MUR 2776
Campaign '88 and F. Champion)
Ward, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on April 17, 1989, the Commission decided by a vote of 6-0 to take the following actions in MUR 2776:

1. Enter into conciliation with Greenwich Presidential Issues Campaign '88 and F. Champion Ward, as treasurer, prior to a finding of probable cause to believe.
2. Approve the proposed Conciliation Agreement and letter, as recommended in the General Counsel's report signed April 13, 1989.

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

Attest:

April 17, 1989
Date

Hilda Arnold
for Marjorie W. Emmons
Secretary of the Commission

Received in the Office of Commission Secretary:	Thurs.,	4-13-89,	1:00
Circulated on 48 hour tally basis:	Thurs.,	4-13-89,	4:00
Deadline for vote:	Mon.,	4-17-89,	4:00



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 19, 1989

F. Champion Ward, Treasurer
Greenwich Presidential Issues
Campaign '88
31 Strickland Road
Cos Cob, CT 06807

RE: MUR 2776
Greenwich Presidential
Issues Campaign '88 and
F. Champion Ward, as
treasurer

Dear Mr. Ward:

On January 17, 1989, the Federal Election Commission found reason to believe that Greenwich Presidential Issues Campaign '88 and F. Champion Ward, as treasurer, violated 2 U.S.C. §§ 433, 434(c) and 441d(a)(3). At your request, on April 17, 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.

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

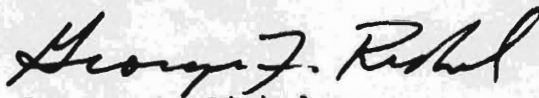
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F. Champion Ward
Page 2

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 Franja Monarski, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel



BY: George F. Rishel
Acting Associate General Counsel

Enclosure
Conciliation Agreement

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89 MAY 24 AM 10:50

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of
Greenwich Presidential Issues
Campaign '88 and F. Champion
Ward, as treasurer)
MUR 2776)

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed by F. Champion Ward, the treasurer of Greenwich Presidential Issues Campaign '88.

The attached agreement contains no changes from the agreement approved by the Commission on April 17, 1989. F. Champion Ward also submitted a check for \$300, the amount of the civil penalty, with the signed conciliation agreement.

II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with Greenwich Presidential Issues Campaign '88 and F. Champion Ward, as treasurer.
2. Close the file.
3. Approve the attached letters.

Lawrence M. Noble
General Counsel

Date 5/23/89

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

Attachments

1. Conciliation Agreement
2. Photocopy of civil penalty check
3. Letter to Respondent
4. Letter to Complainant

Staff Assigned: Frania Monarski

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Greenwich Presidential Issues
Campaign '88 and F. Champion
Ward, as treasurer

MUR 2776

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal
Election Commission, do hereby certify that on May 26,
1989, the Commission decided by a vote of 5-0 to take
the following actions in MUR 2776:

1. Accept the conciliation agreement with Greenwich
Presidential Issues Campaign '88 and F. Champion
Ward, as treasurer, as recommended in the
General Counsel's report signed May 23, 1989.
2. Close the file.
3. Approve the letters, as recommended in the
General Counsel's report signed May 23, 1989.

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

Attest:

May 26, 1989
Date

Hilda Arnold
for Marjorie W. Emmons
Secretary of the Commission

Received in the Office of Commission Secretary:	Wed.,	5-24-89,	10:50
Circulated on 48 hour tally basis:	Wed.,	5-24-89,	4:00
Deadline for vote:	Fri.,	5-26-89,	4:00



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 2, 1989

F. Champion Ward, Treasurer
Greenwich Presidential Issues
Campaign '88
31 Strickland Road
Cos Cob, CT 06807

RE: MUR 2776
Greenwich Presidential
Issues Campaign '88 and
F. Champion Ward, as
treasurer

Dear Mr. Ward:

On May 26, 1989, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on your behalf in settlement of a violation of 2 U.S.C. §§ 433, 434(c) and 441d(a)(3), provisions of the Federal Election Campaign Act of 1971, as amended. 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.

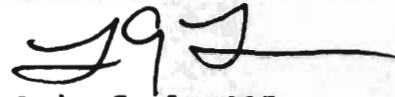
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F. Champion Ward
Page 2

Enclosed you will find a copy of the fully executed conciliation agreement for your files. If you have any questions, please contact Frania Monarski, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel



BY: Lois G. Lerner
Associate General Counsel

Enclosure
Conciliation Agreement

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89 MAY 11 AM 11:43

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
 Greenwich Presidential Issues) MUR 2776
 Campaign '88 and F. Champion Ward,)
 as treasurer)

89 MAY 12 PM 3:42

CONCILIATION AGREEMENT

This matter was initiated by a signed, sworn, and notarized complaint by Elizabeth Heminway and Lawrence J. Halloran. The Federal Election Commission ("Commission") found reason to believe that Greenwich Presidential Issues Campaign '88 and F. Champion Ward, as treasurer, ("Respondents") violated 2 U.S.C. §§ 433, 434(c) and 441d(a)(3).

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

I. The Commission has jurisdiction over the Respondents and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C.

§ 437g(a)(4)(A)(i).

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

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

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

1. Greenwich Presidential Issues Campaign '88 is a political committee within the meaning of 2 U.S.C. § 431(4).

2. F. Champion Ward is the treasurer of Greenwich Presidential Issues Campaign '88.

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3. Pursuant to 2 U.S.C. § 434(c), any independent expenditure aggregating \$1,000 made within twenty days prior to but more than twenty-four hours before, a federal election must be reported within twenty-four hours after such expenditure was made.

4. Any expenditure which expressly advocates the election of a clearly identified candidate is an independent expenditure if such expenditure was made without the cooperation or consultation with and not made in concert with, or at the request or suggestion of, a candidate or candidate's committee. 2 U.S.C. § 431(17).

5. Respondents published newspaper advertisements on October 26, 27 and 28, 1988 which encouraged voters to elect named federal candidates.

6. The cost to publish these advertisements was \$1,134 and was reported by Respondents on November 28, 1988 as independent expenditures.

7. The general election was held on November 8, 1988.

8. Pursuant to 2 U.S.C. § 433, once an organization exceeds the \$1,000 threshold to qualify as a political committee, the organization must file a Statement of Organization within ten days.

9. In the 1988 Pre-General Report, the Respondents reported a \$1,134 disbursement on October 22, 1988, which placed it over the \$1,000 threshold for qualifying as a political committee.

10. The Respondents registered with the Commission on

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November 2, 1988.

11. Pursuant to 2 U.S.C. § 441d(a), any expenditure for a communication which expressly advocates the election of a clearly identified candidate must state whether or not the communication was authorized by the candidate or an authorized political committee of a candidate.

12. The Respondents included "Paid for by the Greenwich Presidential Issues Campaign '88, F. Champion Ward, Treasurer" on their advertisements, however, did not indicate whether or not they were authorized by the federal candidates that they advocated.

V. Respondents failed to report in a timely manner independent expenditures aggregating in excess of \$1,000 and made within twenty days, but more than twenty-four hours, before a federal election in violation of 2 U.S.C. § 434(c). Secondly, respondents failed to file their Statement of Organization with the Commission in a timely manner in violation of 2 U.S.C. § 433. Thirdly, the Respondents failed to include the appropriate disclaimer indicating whether the advertisement was authorized by the federal candidates or their authorized political committees in violation of 2 U.S.C. § 441d(a)(3).

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of three hundred dollars (\$300) pursuant to 2 U.S.C. § 437g(a)(5)(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

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

X. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be enforceable.

FOR THE COMMISSION:

Lawrence M. Noble
General Counsel

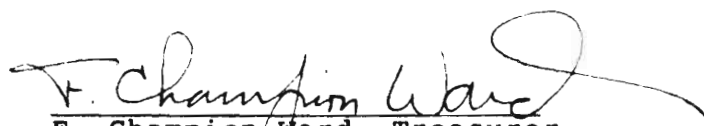
BY:


Lois G. Lerner
Associate General Counsel

Date

6/1/89

FOR THE RESPONDENTS:


F. Champion Ward, Treasurer
Greenwich Presidential Issues
Campaign '88

Date

May 7, 1989

89040752332



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 2, 1989

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Lawrence J. Halloran, Esq.
Gaffney & DiFabio
One Liberty Square
New Britain, CT 06051

RE: MUR 2776

Dear Mr. Halloran:

This is in reference to the complaint you and Mrs. Elizabeth Heminway filed with the Federal Election Commission on November 7, 1989, concerning the Greenwich Presidential Issues Campaign '88 and F. Champion Ward, as treasurer.

The Commission found that there was reason to believe Greenwich Presidential Issues Campaign '88 and F. Champion Ward, as treasurer, violated 2 U.S.C. §§ 433, 434(c) and 441d(a)(3), provisions of the Federal Election Campaign Act of 1971, as amended and conducted an investigation in this matter. On May 26, 1989, a conciliation agreement signed by the respondent was accepted by the Commission. Accordingly, the Commission closed the file in this matter. A copy of this agreement is enclosed for your information.

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

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
Conciliation Agreement

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2776

DATE FILMED 6/16/89 CAMERA NO. 4

CAMERAMAN AS

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