

FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 30463

THIS IS THE BEGINNING OF MUR # 2939

DATE FILMED 3/8/9/ CAMERA NO. 4

CAMERAMAN AL

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 26 April 1989

ANALYST: Anthony D. Raymond

I. COMMITTEE:

Keep Hope Alive Political Action
Committee (C00229286)
Cirilo A. McSween, Treasurer
(October 15, 1988 - Present)
Alvin J. Boutte, Treasurer
(June 28, 1988 - October 14, 1988)
733 15th Street, NW, Room 7001
Washington, DC 20005

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

III. BACKGROUND:

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Receipt of Apparent Impermissible Contributions From Unregistered Organizations

The Keep Hope Alive Political Action Committee ("the Committee") received apparent impermissible contributions from four (4) unregistered organizations totalling \$5,850 during the 1988 October Quarterly reporting period.

The 1988 October Quarterly Report disclosed the following contributions from unregistered organizations: \$5,000 from Friends of Jesse Jackson on July 13, 1988; \$250 from the John Wiley Price Campaign on July 9, 1988; \$500 from the Committee to Elect Rev. A.R. Polk on July 10, 1988; and \$100 from the Mid-Brooklyn Political Association on September 15, 1983 (Attachment 2).

On December 7, 1988, a Request for Additional Information ("RFAI") was sent to the Committee concerning the permissibility of the funds received from the unregistered organizations. The RFAI stated that if the funds were impermissible, the Committee should refund the amounts to the donors or transfer the funds to a non-federal account with the donor's consent (Attachment 3).

¹/ Prior to the 1988 Year End Report, the Committee listed its address as 1074 Thomas Jefferson Street, Washington DC 20007.

KEEP HOPE ALIVE POLITICAL ACTION COMMITTEE REPORTS ANALYSIS OGC REFERRAL PAGE 2

On December 15, 1988, Cirilo A. McSween, the Committee's treasurer, filed a response that stated:

We have transferred \$6,975 from our Federal funds account to our Non-Federal funds account, while we work to verify the source of the money donated by the following groups--\$5,000 from Friends of Jackson; \$100 from the Mid-Brooklyn Political Association; \$500 from the Committee to Elect Rev. A. R. Polk; \$250 from the John Wiley Price Campaign; and \$1,000 from Eddie Bernice Johnson; and another \$125 to cover two checks which may be corporate.

(Attachment 4).

On December 30, 1988, a Second Notice was sent to the Committee requesting a photocopy of the transfer (Attachment 5).

On January 13, 1989, Steve Cobble, the Committee's Executive Director, met with the Reports Analysis Division ("RAD") analyst to discuss the Second Notice. The RAD analyst stated that a photocopy of the transfer-out was needed. Mr. Cobble explained that logistics problems had probably caused the omission but he was not certain the transfer had occurred. He stated he would investigate and that a written response to the Second Notice would be filed soon (Attachment 6).

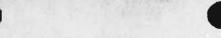
On January 30, 1989, Mr. Cobble submitted a letter addressing issues discussed in the meeting with the RAD analyst. Mr. Cobble acknowledged the transfer-out; however, the photocopy of the transfer-out was again omitted (Attachment 7).

On January 31, 1989, the Committee filed a copy of a debt memo for \$6,975 noting the transfer-out which occurred on January 24, 1989 (Attachment 8).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

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ATTACHMENT #1

DATE 14APR89

PAGE 3

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

COMMITTEE DOCUMENT RECEIPTS DISBURSEMENTS 4 OF MICROFILM
COVERAGE DATES PAGES LOCATION
TYPE OF FILER

KEEP	HOPE ALIVE POLITICAL ACTION CONNITTEE			ID 0C00229286 NON-F	PARTY NON-QUALIFIED
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5 4 3	REQUEST FOR ADDITIONAL INFORMATION REQUEST FOR ADDITIONAL INFORMATION 2ND POST-GENERAL YEAR-END YEAR-END - ANENDMENT REQUEST FOR ADDITIONAL INFORMATION	2,968 1,096 1,096	18,290 26,822 35,797	1JULB8 -30SEP88 1JULB8 -30SEP88 1DCT88 -28NDV88 29NDV88 -31DEC88 29NDV88 -31DEC88 29NDV88 -31DEC88	4 89FEC/568/2721 3 89FEC/575/4818 5 89FEC/574/4516 8 89FEC/583/2706 6 89FEC/589/4946 1 89FEC/588/0159
$\widehat{}$	TOTAL	223,481	0 77,486	0	89 TOTAL PAGES

All reports have been reviewed.

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Cash-on-hand as of 12/31/88: \$ 146,045

Debts and obligations owed to the committee as of 12/31/38: S-9-Debts and obligations owed by the committee as of 12/31/30: S-9-

1988 October Quarterly Report proper designer. CHECULEA (Contributions from Political Con (ttoos) THE PROPERTY OF THE PARTY OF TH A C ASSESSED Keep Hope Alive Political Action Committee Coolman ATTACHMENT #2 A Publisher, Malling Address and SP Onds Amount of Rest Name of Brightyer Date (Manth, day, year) Friends of Jesse Jackson \$5,000.00 7/13/88 Washington, D.C. I Consul Reselpt Per: Printery ACTUAL VIEW NO. Chiny breatly): 6. Poll Harris, Malling Address and 20 Gol Name of Balgioper -Congressman Major Ovens In '88 Committee P.O. Box 2265 100.00 8/29/88 Brooklyn, NY 11202-2265 Compathe malpt For: Princy X Control Other ispecify): Augrephy Year-on-Date > 8 Mg C. Pull Noon, Malling Address and ZIP Code Name of Smalturer Date Imensil, ra of God -Mid Brooklyn Political Assn. CI 100.00 9/15/88 9 Ounquilen Passipt For: • - Chance X Comme Other (specify): Approprie Year-to-Date > 8 2 D. Pull Horn, Malling Address and ESP Code Name of Employer Amount of Easts Committee To Elect day, year) (Sec./Treas. of Extension) \$ 500.00 7/10/88 S05 Beechwood St. River Rouge, MI 48218 . 2 Coher tepesity) Appropriate Year on Ours > 6 Ou :2 John Wiley Price Campaign Name of Employer or of Euch Date treenth. sight this Person -406 E. 5th St. 943-8114 250.00 Dallas, TX 75203 7/9/88 X Correct Reseipt For Printery Other Ispecify Agreem Yer 4-0m > 6 15 F. Full Name, Malling Address and 21P Cade Name of Employer Amount of Each Edde Bonce Idean . 365 the own A 1 000 % 110/55 Pelles fear 722 Promery U General Other Ispatily Aggregate Year to Dose > 8 0 Full Name, Malling Address and 21P Code -

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Mirile Milleren, Treserrer Miss Bape Alive Political Misses Committee 1974 Thomas Jefferson Street Mashington, DC 20007

Identification Westers C00229206

Reference: October Quarterly Report (7/1/89-9/30/00)

Dear Mr. McGween:

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

-The identification of each contributor, including the person's occupation and name of employer, must be provided if the person has contributed in excess of \$200 in the aggregate during the calendar year. Please amend Schedule A supporting Line 11(a)(i) for each entry lacking a contributor's occupation and name of employer.

Note: If your committee has made at least one effort per solicitation, either by a written request or by an oral request documented in writing to obtain this information from the contributor, your committee may have exercised "best efforts." Under 11 CFR 104.7(b), such effort shall consist of a clear request for the information (i.e., name, mailing address, compation, and name of employer) which request information the contributor that the reporting of such information is required by law. If you believe that your committee satisfies the "best efforts" provision, you should provide a copy of your solicitation or an explanation of the method(s) used to obtain contribution information. Clarification regarding "best efforts" should be disclosed during each two year election cycle beginning with the first report filed in the non-election year. 11 CFR 104.3(a)(4)(i)

-Tour report discloses limited payments for administrative expenses. Administrative expenses are payments made for the purpose of operating a political

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

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

Any goods or services provided to your committee by a person, except volunteer activity (i.e., a person's time), would be considered an in-kind contribution from that person, and would be subject to the disclosure requirements of 2 U.S.C. \$434(b)(3) and 11 CFR 104.13, and the limitations and prohibitions of 2 U.S.C. \$5441a and 441b.

Please provide clarification regarding administrative expenses incurred by your committee and/or amod your report to disclose such expenses according to the referenced provisions of the Act and Commission regulations. Clarification regarding administrative expenses should be disclosed during each two year election cycle beginning with the first report filed in the non-election year.

-Schedule A of your report (pertinent portion(s) attached) discloses a contribution(s) from an organization(s) which is not a political committee registered with the Commission. Under 11 CFR 182.5(b), organizations which are not political committees under the Act must either: 1) establish a separate account which contains only those funds permitted under the Act, or 2) demonstrate through a reasonable accounting method that the organization has received sufficient funds subject to the limitations and prohibitions in order to make the contribution.

If your committee does not finance non-federal activity, the receipt of the referenced contribution(s) may violate the limitations and prohibitions of the Act. (2 U.S.C. \$\$441a(f) and 441b) If your committee engages in both federal and non-federal activity, either through a separate non-federal account, or one account that finances activity in connection with both

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Please clerify whether the contribution(s) received from the referenced organization(s) is permissible. To the extent that your committee has received funds which are not permissible, the Commission recommends that you refund the impermissible amount(s) to the donor(s) in accordance with 11 CFR 103.3(b). Alternatively, if you choose to transfer the funds to an account not used to influence federal elections, the Commission advises that you inform the contributor in writing and provide the contributor with the option of receiving a refund. You may wish to seek a written authorization (either before or after the transfer-out) from the donor for any transfer-out to protect the donor's interests.

Please inform the Commission immediately in writing and provide a photocopy of your check for the refund of transfer-out. Refunds and transfers-out should be disclosed on a supporting Schedule B for Line 26 or 29 of the report covering the period during which they are made.

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If the contribution(s) in question was incompletely of incorrectly disclosed, you should amend your original report with the clarifying information.

Although the Commission may take further legal steps concerning the acceptance of prohibited contributions, prompt action by your committee in refunding or transferring-out the amounts will be taken into consideration.

A written response of an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My level number is (202) 376-2480.

Sincerely

Anthony Rywond

Senior Reports Analyst
Reports Analysis Division

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November 9, 1998
Reep Nope Alive Political
Action Committee
1074 Thomas Jefferson St.
Washington, D.C. 20007

Mr. Anthony D. Raymond Senior Analyst Federal Election Commission 999 E Street, N.W. Washington, D.C. 20463

Dear Mr. Raymond,

This letter will amend the third quarter report of the Keep Hope Alive Political Action Committee. We have undertaken the following steps since the submission of that report, in order to rectify some inadequacies in the original submission:

"We have sent out a letter from the PAC to all those donors who gave over \$200, asking them their employer's name and their occupation (a copy of this letter is attached).

*We have sent a letter to Ms. Beverlee Bruce, Ph.D., asking if the \$50 she gave us was personal, and asking her to verify that she is a citizen.

*We have added in the activity from the Atlanta bank account established at the time of the Democratic National Convention, which was inadvertently left off of the first third quarter report. (These new figures are attached.)

*We have transferred \$6,975 from our Federal funds account to our Non-Federal funds account, while we work to verify the source of the money donated by the following groups--\$5,000 from Friends of Jackson; \$100 from the Mid-Brooklyn Political Association; \$500 from the Committee to Elect Rev. A. R. Polk; \$250 from the John Wiley Price Campaign; and \$1,000 from Eddie Bernice Johnson; and another \$125 to cover two checks which may be corporate.

We trust this improves our submission. In the future, we will endeavor to file timely, complete, and accurate reports, particularly as we gain more experience in the FEC/PAC process. Thank you for your assistance in this matter.

Sincerely,

Cirile Massach

Treasurer



FEDERAL ELECTION COMMISSION R

December 30, 1988

Cirilo McSween, Treasurer Keep Bope Alive Political Action Committee 1074 Thomas Jefferson Street Washington, DC 20007

Identification Number: C00229286

Reference: October Quarterly Report (7/1/88-9/30/88)

Dear Mr. McSween:

On December 7, 1988 you were notified that a review of the above-referenced report(s) raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act.

Your December 15, 1988 response is incomplete because you have not provided all the requested information. For this response to be considered adequate, the following information is still required.

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

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

Any goods or services provided to your committee by a person, except volunteer activity (i.e., a person's time), would be considered an in-kind contribution from that person, and would be subject to the disclosure

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requirements of 2 U.S.C. 5434(b)(3) and 11 CFR 104.13, and the limitations and prohibitions of 2 U.S.C. 55441a and 441b.

Please provide clarification regarding administrative expenses incurred by your committee and/or amend your report to disclose such expenses according to the referenced provisions of the Act and Commission regulations. Clarification regarding administrative expenses should be disclosed during each two year election cycle beginning with the first report filed in the non-election year.

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

If your committee does not finance non-federal activity, the receipt of the referenced contribution(s) may violate the limitations and prohibitions of the Act. (2 U.S.C. §344la(f) and 44lb) If your committee engages in both federal and non-federal activity, either through a separate non-federal account, or one account that finances activity in connection with both federal and non-federal elections, your committee may be in violation of 11 CFR 102.5(a).

Please clarify whether the contribution(s) received from the referenced organization(s) is permissible. To the extent that your committee has received funds which are not permissible, the Commission recommends that you refund the impermissible amount(s) to the donor(s) in accordance with 11 CFR 103.3(b). Alternatively, if you choose to transfer the funds to an account not used to influence federal elections, the Commission advises that you inform the contributor in writing and provide the contributor with the option of receiving a refund. You may wish to seek a written authorization (either before or after the transfer-out) from the donor for any transfer-out to protect the donor's interests.

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Please inform the Commission immediately in writing and provide a photocopy of your check for the refund at disclosed on a supporting Schedule B for Line 16 or a supporting the period during which they are note.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information.

Although the Commission may take further legal steps concerning the acceptance of prohibited contributions, prompt action by your committee in refunding or transferring-out the amounts will be taken into consideration.

If this information is not received by the Commission within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

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

Sincerely,

John D. Gibson

Assistant Staff Director Reports Analysis Division



ANALYST:

Tony Raymond

CONVERSATION WITH:

Steve Cobble

COMMITTEE:

Keep Hope Alive

DATE:

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January 13. 1989

SUBJECT(S): Second Notice

Mr. Cobble came in to discuss the December 30, 1988, Second Notice for the 1988 October Quarterly Report. We discussed "best efforts" and the receipt of possible impermissible funds. Mr. Cobble explained that letters to contributors requesting information had been sent. Mr. Cobble then stated that he was not sure that the transfer-out of possible impermissible funds had occurred. He stated that he was in the process of establishing an office in DC, and that he would check with Chicago to get a copy of the bank transfer. He said that logistics had been a problem. Mr. Cobble was informed that the contribution from the Friends of Jesse Jackson was not a contribution from a federally registered committee. He said that he believed the funds were made up of individual contributions, but that his committee would take a conservative approach and transfer-out the funds. He said that a written response to the Second Notice would be filed soon.

Keep Hope Alive Political 89 MAN 30 AM 10 00 Action Committee 733 15th St., N.W.; Room \$700 Mashington, D.C. 20005 January 13, 1989

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

Dear Mr. Gibson:

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In response to your letter of December 30, 1988, to the Keep Hope Alive Political Action Committee, I would like to report the following:

--You noted that during the period July 1, 1988, through September 30, 1988, the PAC had very low expenses for administrative functions. That is correct. As it happens, the Keep Hope Alive PAC raised its early money at gatherings during the Atlanta Convention, at no cost; and, from one direct mail effort after the convention, for which the consultant expenses were detailed in the disbursement section of the report.

The PAC had no staff until after October 15, 1988. It had no office space until December 1, 1988 (although friends of the PAC did agree to collect mail for the PAC at our old Thomas Jefferson St. address). The PAC had no phone until December 21, 1988. Thus, we had almost no administrative expenses during not only the third quarter reporting period, but also for the post-election reporting period.

We now have an executive director; a telephone (202) 737-4673; and a new office, at the address above. These costs will be reported in our next report, and in all subsequent reports.

--The other question you had involved a contribution the PAC received from a committee which was not registered with the FEC. Since that time, this \$5,000 contribution, along with another \$1,975 in contributions which we could not quickly verify as qualified for our federal account, have been transferred to our non-federal account. (The deposit/transfer slip is attached for verification.) -> \(\) \

I trust these responses will answer your questions. If you have any further questions, please contact me through the PAC office in Washington-Steve Cobble, at 737-4673. Think room.

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PLEASE ADJUST YOUR RECORDS DATE 1-24-89

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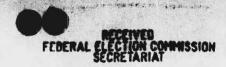
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FEDERAL ELECTION COMMISSION 999 E Street, N.W. Washington, D.C. 20463 SENSITIVE EXECUTIVE

FIRST GENERAL COUNSEL'S REPORT

AUG 15 1989

RAD Referral #89L-11 STAFF MEMBER: Daniel Blessington

SOURCE: INTERNALLY GENERATED

RESPONDENTS: Keep Hope Alive Political Action Committee and Cirilo A. McSween, as treasurer

RELEVANT STATUTES: 11 C.F.R. § 102.5(a)(1)

INTERNAL REPORTS CHECKED: Referral Materials

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

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This matter was generated as a result of the review by the Reports Analysis Division ("RAD") of reports filed by the Keep Hope Alive Political Action Committee ("Committee"). RAD has indicated that the Committee's 1988 October Quarterly Report disclosed contributions from four unregistered organizations totaling \$5,850. Of this amount, \$5,000 was reported as having been received from the Friends of Jesse Jackson on July 13, 1988; \$250 from the John Wiley Price Campaign on July 9, 1988; \$500 from the Committee to Elect Rev. A.R. Polk on July 10, 1988; and \$100 from the Mid-Brooklyn Political Association on September 15, 1988.

The Committee responded to a request for additional information ("RFAI") by representing that it had transferred moneys from its federal funds account to its non-federal funds account while it sought to verify the source of the above-described and other contributions. In fact, funds were not

transferred until after the issuance of a second RFAI and a meeting between the Committee's executive director and a RAD analyst. The funds covering the \$5,850 questioned by RAD were finally transferred out of the Committee's federal account on January 24, 1989; the total amount of the transfer was \$6,975.

The Committee established a non-federal account after receiving the RFAIs, having been unable to establish that the contributions from the Friends of Jesse Jackson and others were permissible. According to the Committee's executive director, the \$5,000 contribution from the Friends of Jesse Jackson was from individuals unknown. Whether or not a formal entity by this name actually exists cannot be determined from the referral.

The Committee registered in June of 1988. According to its executive director, the Committee was founded by Jesse Jackson; its purpose is described in its literature as helping "to deliver Reverend Jackson's message throughout the nation..."

(Attachment 2)

II. FACTUAL AND LEGAL ANALYSIS

Commission regulations at 11 C.F.R. § 102.5(a)(1) require organizations that finance political activity in connection with both federal and non-federal elections to either establish separate federal and non-federal accounts or establish a political committee that only receives contributions subject to the limitations and prohibitions of the Federal Election Campaign Act of 1971, as amended. The Committee, by failing to establish a non-federal account until after receiving apparently impermissible contributions, violated this provision.

III. RECOMMENDATIONS

- 1. Open a MUR.
- 2. Find reason to believe that the Keep Hope Alive Political Action Committee and Cirilo A. McSween, as treasurer, violated 11 C.F.R. § 102.5(a)(1).
- 3. Approve the attached letter, factual and legal analysis, questions, and document requests.

Lawrence M. Noble General Counsel

8/2/89

BY:

Lois G. Lerner

Associate General Counsel

Attachments:

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- 1. Referral Materials
- 2. Letter to RAD
- 3. Proposed Letter and Factual and Legal Analysis
- 4. Questions, document requests



FEDERAL ELECTION COMMISSION

WASHINGTON D.C. 20463

TO:	LAWRENCE M. NOBLE GENERAL COUNSEL		
FROM:	MARJORIE W. EMMONS / DELORES R. HARRIS DEN COMMISSION SECRETARY		
DATE:	AUGUST 7, 1989		
SUBJECT:	RAD REFERRAL 89L-11 - GENERAL COUNSEL'S REPORT DATED AUGUST 2, 1989		
Mha abass	captioned document was circulated to the		
The above-			
	Chursday, August 3, 1989 at 4:00 p.m.		
Commission on g	Chursday, August 3, 1989 at 4:00 p.m.		
Commission on g	s) have been received from the Commissioner(s)		
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Please notify us who will represent your Division before the Commission on this matter.

for Tuesday, August 15, 1989 at 10:00 a.m.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Keep Hope Alive Political Action Committee and Cirilo A. McSween, as treasurer

RAD Referral 89L-11 MUR 2939

CERTIFICATION

- I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of August 22, 1989, do hereby certify that the Commission decided by a vote of 5-0 to take the following actions with respect to the above-captioned referral:
 - Open a Matter Under Review (MUR). l.
 - 2. Find reason to believe that the Keep Hope Alive Political aciton Committee and Cirilo A. McSween, as treasurer, violated 11 C.F.R. § 102.5(a)(1) and 2 U.S.C. § 441b.
 - Direct the Office of General Counsel to send an 3. appropriate letter, factual and legal analysis, questions and document requests pursuant to the above-noted actions.

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

Attest:

Date

Marjorie W. Emmons Secretary of the Commission

Marjone W. Emmens

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 12, 1989

Cirilo A. McSween, Treasurer Keep Hope Alive Political Action Committee 733 15th Street, N.W. - Room 700 Washington, D.C. 20005

> MUR 2939 RE:

> > Keep Hope Alive Political

Action Committee

Dear Mr. McSween:

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On August 22, 1989, the Federal Election Commission found that there is reason to believe that the Keep Hope Alive Political Action Committee ("Committee") and you, as treasurer, violated 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended, and 11 C.F.R. § 102.5(a)(1) of the Commission's regulations. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Federal Election Campaign Act of 1971, as amended you have an opportunity to demonstrate that no action should be taken against the Committee and you, as treasurer. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office along with responses to the enclosed questions and request for documents within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

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

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

Cirilo A. McSween Page 2 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 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. §§ 437q(a)(4)(B) and 437q(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public. For your information, we have attached a brief description 0 of the Commission's procedures for handling possible violations. If you have any questions, please contact Daniel J. Blessington 4 of this Office at (202) 376-5690. Chairman Enclosures Factual and Legal Analysis Procedures Designation of Counsel Form Questions and Document Request

FEDERAL ELECTION COMMISSION FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: Reep Hope Alive Political
Action Committee and
Cirilo A. Mcsween, as treasurer

MUR 2939

This matter was generated as a result of the review by the Reports Analysis Division ("RAD") of reports filed by the Keep Hope Alive Political Action Committee ("Committee"). RAD has indicated that the Committee's 1988 October Quarterly Report disclosed contributions from four unregistered organizations totaling \$5,850. Of this amount, \$5,000 was reported as having been received from the Friends of Jesse Jackson on July 13, 1988; \$500 from the Committee to Elect Rev. A.R. Polk on July 10, 1988; and \$100 from the Mid-Brooklyn Political Association on September 15, 1988.

The Committee responded to a request for additional information ("RFAI") by representing that it had transferred moneys from its federal funds account to its non-federal funds account while it sought to verify the source of the above-described and other contributions. In fact, funds were not transferred until after the issuance of a second RFAI and a meeting between the Committee's executive director and a RAD analyst. The funds covering the \$5,850 questioned by RAD were finally transferred out of the Committee's federal account on January 24, 1989; the total amount of the transfer was \$6,975.

The Committee established a non-federal account after receiving the RFAIs, having been unable to to establish that the

contributions from the Friends of Jesse Jackson and others were permissible. According to the Committee's executive director, the \$5000 contribution from the Friends of Jesse Jackson was from individuals unknown. Whether or not a formal entity by this name actually exists cannot be determined from the referral.

The Committee registered in June of 1988. According to its executive director, the Committee was founded by Jesse Jackson; its purpose is described in its literature as helping "to deliver Reverend Jackson's message throughout the nation..."

The Federal Election Campaign Act of 1971, as amended ("the Act"), prohibits "any corporation whatever" from "directly or indirectly" making any contribution or expenditure in connection with any federal election and prohibits any federal political committee from knowingly accepting any such contribution or expenditure. 2 U.S.C. § 441b. Commission regulations at 11 C.F.R. § 102.5 require organizations that finance political activity in connection with both federal and non-federal elections to either establish separate federal and non-federal accounts or establish a political committee that only receives contributions subject to the limitations and prohibitions of the Act. The Committee, in that it has accepted contributions from unregistered organizations in states and other jurisdictions that permmit corporate or union contributions, received apparently impermissible contributions into its federal account. Therefore, there is reason to believe that the Committee and its treasurer, Cirilo A. Mcsween, violated 2 U.S.C § 441b and 11 C.F.R. \$102.5(a)(1).

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

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MUR 2939

INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS

TO: Cirilo A. McSween, Treasurer
Keep Hope Alive Political Action Committee
733 15th Street, N.W.
Room 700
Washington, D.C. 20005

In furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby requests that you submit answers in writing and under oath to the questions set forth below within 15 days of your receipt of this request. In addition, the Commission hereby requests that you produce the documents specified below, in their entirety, for inspection and copying at the Office of the General Counsel, Federal Election Commission, Room 659, 999 E Street, N.W., Washington, D.C. 20463, on or before the same deadline, and continue to produce those documents each day thereafter as may be necessary for counsel for the Commission to complete their examination and reproduction of those documents. Clear and legible copies or duplicates of the documents which, where applicable, show both sides of the documents may be submitted in lieu of the production of the originals.

Keep Hope Alive MUR 2939

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INSTRUCTIONS

In answering these interrogatories and request for production of documents, furnish all documents and other information, however obtained, including hearsay, that is in possession of, known by or otherwise available to you, including documents and information appearing in your records.

Each answer is to be given separately and independently, and unless specifically stated in the particular discovery request, no answer shall be given solely by reference either to another answer or to an exhibit attached to your response.

The response to each interrogatory propounded herein shall set forth separately the identification of each person capable of furnishing testimony concerning the response given, denoting separately those individuals who provided informational, documentary or other input, and those who assisted in drafting the interrogatory response.

If you cannot answer the following interrogatories in full after exercising due diligence to secure the full information to do so, answer to the extent possible and indicate your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information.

Should you claim a privilege with respect to any documents, communications, or other items about which information is requested by any of the following interrogatories and requests for production of documents, describe such items in sufficient detail to provide justification for the claim. Each claim of privilege must specify in detail all the grounds on which it rests.

Unless otherwise indicated, the discovery request shall refer to the time period from June 1, 1988 to the present.

The following interrogatories and requests for production of documents are continuing in nature so as to require you to file supplementary responses or amendments during the course of this investigation if you obtain further or different information prior to or during the pendency of this matter. Include in any supplemental answers the date upon which and the manner in which such further or different information came to your attention.

Keep Hope Alive MUR 2939 DEFINITIONS For the purpose of these discovery requests, including the instructions thereto, the terms listed below are defined as follows:

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"You" shall mean the named respondent in this action to whom these discovery requests are addressed, including all officers, employees, agents or attorneys thereof.

"Persons" shall be deemed to include both singular and plural, and shall mean any natural person, partnership, committee, association, corporation, or any other type of organization or entity.

"Document" shall mean the original and all non-identical copies, including drafts, of all papers and records of every type in your possession, custody, or control, or known by you to exist. The term document includes, but is not limited to books, letters, contracts, notes, diaries, log sheets, records of telephone communications, transcripts, vouchers, accounting statements, ledgers, checks, money orders or other commercial paper, telegrams, telexes, pamphlets, circulars, leaflets, reports, memoranda, correspondence, surveys, tabulations, audio and video recordings, drawings, photographs, graphs, charts, diagrams, lists, computer print-outs, and all other writings and other data compilations from which information can be obtained.

"Identify" with respect to a document shall mean state the nature or type of document (e.g., letter, memorandum), the date, if any, appearing thereon, the date on which the document was prepared, the title of the document, the general subject matter of the document, the location of the document, the number of pages comprising the document.

"Identify" with respect to a person shall mean state the full name, the most recent business and residence addresses and the telephone numbers, the present occupation or position of such person, the nature of the connection or association that person has to any party in this proceeding. If the person to be identified is not a natural person, provide the legal and trade names, the address and telephone number, and the full names of both the chief executive officer and the agent designated to receive service of process for such person.

"And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and requests for the production of documents any documents and materials which may otherwise be construed to be out of their scope.

BEFORE THE FEDERAL ELECTION COMMISSION

Keep Hope Alive MUR 2939

QUESTIONS AND REQUEST FOR DOCUMENTS

A. Questions

- 1. Please describe the circumstances surrounding the receipt of a \$5,000 contribution from the Friends of Jesse Jackson, reported as having been made on July 13, 1988. Include any discussions between you and representatives of the contributor.
- Please describe the Friends of Jesse Jackson, referred to in question #1. State whether or not it is a formal organization. If it is a formal organization, provide its address and the names of its officers. If not a formal organization, provide the names and addresses of those individuals comprising the group.

B. Document Request

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- 1. Please provide all documents and materials that relate, refer or pertain to the following contributions that you reported receiving.
 - a. \$5,000 from the Friends of Jesse Jackson (July 13, 1988).
 - b. \$250 from the John Wiley Price Campaign (July 9, 1988);
 - c. \$500 from the Committee to Elect Rev. A. R. Polk (July 19, 1988); and
 - d. \$100 from the Mid-Brooklyn Political Association (September 15, 1988).

BORO, NORTH CAROLINA 27401 101 EAST KENNEDY BOULEVARD PA. PLOPIDA 33602



PATTON, BOGGS & BLOW 2550 M STREET, N.W.

WASHINGTON, D.C. 20037-1350 (202) 457-6000

TELECOPIER: 467-6315 TRT TELEX: 197780

October 3, 1989

250 WEST PRATT STREET BALTIMORE, MARYLAND 21201 (301) 659-5600

700 RALEIGH FEDERAL SAVINGS BANK BUILDING RALEIGH, NORTH CAROLINA 27802 (019) 832-4111

WRITERS DIRECT DIAL

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

BY HAND

Re: MUR 2939, Keep Hope Alive PAC

Dear Mr. Long:

As we discussed this morning by telephone, Patton, Boggs & Blow has been designated as counsel to Keep Hope Alive Political Action Committee ("Keep Hope Alive PAC") in the above-referenced MUR. Attached is the designation of counsel form.

This letter confirms our request for a 14-day extension to respond to the Commission's inquiry by October 17, 1989. This extension is necessary to enable us to obtain relevant documents from the PAC's bank in Chicago and to contact by letter people who may be familiar with the making of the contributions at issue in this MUR. The PAC's Executive Director, Steven Cobble, already has been successful in contacting some of these people by telephone, but others are reachable only by letter. If we do not receive responses to our written inquiries by October 17, we will file as complete a preliminary response as possible and supplement that response as we receive more information.

Thank you for your cooperation. I look forward to receiving formal approval of our extension shortly.

Sincerely,

Kath Boyce
Katharine R. Boyce

Counsel to Keep Hope Alive PAC

KRB/tsp Attachment

cc: Steven B. Cobble, Executive Director
Keep Hope Alive PAC
Roger Ballentine, Esquire





STATEMENT OF DESIGNATION OF COUNSEL

MUR #2939			
NAME OF COUNSEL:	Ms. Kate Boyce		
ADDRESS:	Patton, Boggs & Blow		
	2550 M Street, N.W.		
<u>.</u>	Washington, D.C. 20037		
TELEPHONE:	(202) 457-6094		

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

9/20/89	(Dr.	Mary F.	Berry)	marie -
Date			Signature	(Secretary/Treasurer
				Keen Hone Alive PAC

RESPONDENT'S NAME:

(Keep Hope Alive PAC)
Cirilo A. McSween

230 South State Street
Chicago, Illinois 60604

HOME PHONE:

(312) 786-1918 (w)

BUSINESS PHONE:



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 6, 1989

Katharine R. Boyce, Esquire Patton, Boggs & Blow 2550 M Street, N.W. Washington, D.C. 20037-1350

> RE: MUR 2939

> > Keep Hope Alive PAC and Cirilo

A. McSween, as treasurer

Dear Ms. Boyce:

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This is in response to your letter dated October 3, 1989, which we received on October 4, requesting an extension of 14 days until October 17 to respond to the Commission's findings and request for information. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by the close of business on October 17, 1989.

If you have any questions, please contact Jeffrey D. Long, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble General Counsel

George F. Rishel BY:

Assistant General Counsel

PATTON, BOGGS & BLOW 2550 M STREET, N.W. WASHINGTON, D.C. 20037-1350 (202) 457-6000 TELECOPIER: 457-6315 SO WEST PRATT STREET 104 NORTH ELM STREET BALTIMORE, MARYLAND 21201 TRT TELEX: 197780 QREENSBORO, NORTH CAROLINA 27461 (301) 689-8800 (919) 273-1733 700 RALEIGH FEDERAL SAVINGS 101 EAST KENNEDY BOULEVARD RALEIGH, NORTH CAROLINA 27802 TAMPA, FLORIDA 33602 (813) 222-8888 (919) 832-4111 October 17, 1989 457-6094 VIA HAND DELIVERY

Mr. Danny L. McDonald Chairman Federal Election Commission 999 E Street, N.W. Washington D.C. 20463

Re: MUR 2939, Keep Hope Alive PAC

Dear Chairman McDonald:

By this letter and enclosed documents, the Keep Hope Alive Political Action Committee ("Keep Hope Alive PAC"), by and through its attorneys, Patton, Boggs & Blow, responds to the Federal Election Commission's Interrogatories and Request for Production of Documents dated September 12, 1989. Thank you again for your extension of time for the filing of this Answer.

Having sought and obtained, by all reasonable means, the information relating to the contributions to the Keep Hope Alive PAC in question, your questions can now be answered as follows:

Answer to Question 1. On June 20, 1988, a twenty-five dollar (\$25) per plate dinner was held at the Shiloh Baptist Church located at 9th and P Streets, N.W., Washington D.C.. The dinner was advertised throughout the community, via flyers and invitations, as a dinner featuring the Reverend Jesse Jackson. Reverend Jackson had planned to attend, but could not due to a scheduling conflict. The guest speakers who did attend included Mayor Marion Barry and Congressman Walter Fauntroy. Approximately three hundred (300) people were at the dinner.

The organizers of the dinner opened an account at the Industrial Bank of Washington specifically for this event. The account was opened in the name "Friends of Jesse Jackson". The profits from the dinner— five thousand dollars (\$5000) — were placed into this account. Shortly after the dinner, according to one of the organizers of the event, Mr. Joseph Beavers, the organizers consulted with Jesse Jackson who suggested that the

PATTON, BOGGS & BLOW Chairman Danny L. McDonald Page 2 October 17, 1989 proceeds of the dinner be contributed to the Keep Hope Alive PAC. On July 13, 1988, a five thousand dollar check representing all of the profits from the dinner was written to the Keep Hope Alive PAC. The "Friends of Jesse Jackson" bank account was thereupon closed out. Answer to Question 2. As discussed above, "Friends of Jesse Jackson" is not a formal organization. This was merely the name given to the bank account opened for the purpose of receiving and transferring the proceeds of a dinner held in Washington D.C. at the Shiloh Baptist Church. The head organizer for this event was Mr. Joseph Beavers. Mr. Beavers is a clerk and a trustee of the Shiloh Baptist Church. Mr. Beavers can be reached at (202) 654-6391, and correspondence may be sent care of the Shiloh Baptist Church. Although your Questions do not seek a description of the circumstances surrounding the three other contributions to the Keep Hope Alive PAC mentioned in your Factual and Legal Analysis enclosed with the Commission's September 12, 1989 letter, we have now obtained information pertaining to those contributions, and we wish to share that information with you. Mr. John Wiley Price is a county commissioner from Dallas, On July 9, 1988, he wrote a check to the Keep Hope Alive PAC from his campaign fund in the amount of \$250. We have spoken with Mr. Price, and he has stated that there was at that time no corporate or labor money in his campaign account, nor did his campaign receive any personal contributions greater than \$5000. Mr. James Conolly is the District Leader of the 42nd State Assembly District in New York, and on September 15, 1988 he signed a check for \$100 made out to the Keep Hope Alive PAC from the Mid-Brooklyn Political Association. The Mid-Brooklyn Political Association was an account opened for the purpose of impacting local races in Brooklyn. Mr. Conolly has informed us that the account contained no corporate or union money and no individual contributions of more than \$5000. We are still seeking information pertaining to the \$500 check to the Keep Hope Alive PAC from the Committee to Elect Rev. A. R. Polk dated July 19, 1988. We have written to the last known address of this organization and we are awaiting a reply. We can supply any such information that we obtain.

PATTON, BOGGS & BLOW Chairman Danny L. McDonald Page 3 October 17, 1989 As this information indicates, all of the contributions in question received by the Keep Hope Alive PAC were properly deposited into the PAC's federal account. Furthermore, we believe that the \$5000 representing the profits of the dinner at the Shiloh Baptist Church was properly transferred to the Keep Hope Alive PAC under 11 C.F.R. § 102.6. We do acknowledge, however, that this receipt originally was not properly reported. By virtue of 11 C.F.R. §§ 102.6(c)(5),(7) and § 104.3(a), the Keep Hope Alive PAC was not obligated to report the names of the individual attendees at the dinner, but it should have reported the aggregate \$5000 amount as a memo entry of unitemized contributions. Instead, the amount was reported as a receipt from a committee. This \$5000 and the other three contributions have since been transferred out of the Keep Hope Alive PAC's federal account and into its non-federal account, and the PAC's reports have been amended to reflect this transfer. Therefore, we do not presently see a need to amend further the initial reports listing these contributions. Document Request. Enclosed please find all of the documents, excluding only attorney-client communications, that pertain to the transactions discussed above. 0 We trust that this information satisfies the Commission's requests and demonstrates that no prohibited funds were deposited into the federal account of the Keep Hope Alive PAC. We will be happy to provide any further assistance needed by the Commission in order to close this matter without further action. Very truly yours, Katharine R. Bovce PATTON, BOGGS & BLOW Encls. cc: Daniel Blessington, Esquire

PATTON, BOGGS & BLOW 2550 M STREET, N W WASHINGTON, D.C. 20037-1350

(202) 457-6000

TELECOPEN 467-6318

ITT TELEN 440004 TRT TYLER 197700

260 WEST PRATT STREET BALTIMORE, MARYLAND 21201 (301) 669-8600

June 29, 1988

88 LIN 30 MM ID: 02

(202) 457-6094

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

BY HAND

Re: Registration of the Keep Hope Alive PAC

To Whom It May Concern:

As counsel to the Keep Hope Alive Political Action Committee, I am forwarding the attached Statement of Organization to register the Committee with the Commission.

Thank you in advance for handling the PAC's registration

Sincerely,

Kate Brice Katharine R. Boyce

KRB/emc Enclosure

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cc: Alvin J. Boutte

ECTIVEC ECTION COMMISSION PATIVE DIVISION STATEMENT OF ORGANIZATION I IN MAME OF COMMITTEE IN FLEL JD: 02 Keep Hope Alive Political Action Committee (Check & aggress is charged) 7936 South Cottage Grove Avenue IS THIS STATEMENT AN AMENDMENT? (c) Cay. State and ZIP Code YES 300 Chicago, Illinois 60619 5. TYPE OF COMMITTEE (Check one) (a) This committee is a principal compaign committee. (Complete the candidate information below.) (b) This committee is an authorized committee, and is NOT a principal committee (Complete the candidate information below) Name of Candidate Candidate Pryty Alfillation Office Square (c) This committee supports/opposes only one candidate and is NOT an authorized committee (name of candidate) (d) This committee is a committee of the (National, State or subordinate) (Democratic, Republican, etc.) (e) This committee is a separate segregated fund. (f) This committee supports/opposes more than one Federal candidate and is NOT a separate segregated fund or a party committee. no of Any Conce g Address and ZP Code *:/ F Type of Connected Organization Corporation Corporation wie Capital Stock Labor Organization Membership Organization Trade Association Cooperative Custodian of Records: identify by name, address (phone number - optional) and poston of the person in possession of committee books and records. Malling Address Title or Position 7936 South Cottage Grove Avenue Chicago, Illinois 60619 Alvin J. Boutte Treasurer 8. Tressurer: List the name and address (phone in imber – openier) of the tressurer of the committee; and the name and address of any designates Hart treasurer) Pull Hame Melling Address Title or Position Alvir J. Boutte 7936 South Cottage Grove Avenue Treasurer Chicago, Illinois 60619 Benks or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit Name of Bank, Depository, etc. Malting Address and ZIP Code independence Bank of Initago 7936 South Cottage Grove Avenue

Chicago, Illinois 60619

confly that I have examined this Statement and to the best of my knowledge and belief it is true correct and complete TYPE OR PRINT NAME OF TREASURER SIGNATURE OF TREASURER TYPE OR PRINT NAME OF TREASURER

in roll Stutte

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NOTE Submission of tasse, emphasise information may subject the parameter to the panames of 2 U.S.C. \$43°g. ANY CHANGE IN INFORMATION SHOULD BE REPORTED WITHIN 10 DAYS.

For further information contact Federal Election Commission 70f-free 800-424-9530 Local 202-379-3120

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DATE

88 AUG -9 AH 10: 16

KEEP NOPE ALIVE POLITICAL ACTION CONSITTEE 7936 South Cottage Grove Avenue Chicago, Illinois 60619

August 8, 1988

Pederal Election Commission 999 E Street, M.W. Washington, D. C.

Gent lemen:

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Enclosed is the first quarterly report filing for Keep Hope Alive Political Action Committee which was due on July 15, 1988.

Please accept my apology for not having filed this report on a timely basis. We were formed on June 28, 1988 and were not aware of the filing deadline of July 15. There was no activity for this period. You may be assured that the next report due on October 15 and all subsequent reports will be filed on time.

Thank you for your consideration.

Very truly yours.

Alvin J Coutte

Treasurer

AJB/jm Enclosure

REPORT OF RECEIPTS AND DISBURSEMENTS For Other Than An Authorized Committee

(Summary Page)

USE PEC MAILING LABEL OR TYPE OR PRINT

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1. NAME OF COMMITTEE (in full) Keep Hope Alive Political Action Committee

	ESS (number and street) Check if different than previously repo		TION NUMBER
	936 S. Cottage Grove Avenue STATE and ZIP CODE		ee qualified as a multicandidat
C	hicago, Illinois 60619		URING THIS Reporting Perio
	4. TYPE OF REPOR	on	(date).
(a)	April 15 Quarterly Report	Monthly Report Due On: February 20 Jun	ne 20 🔲 October 20
x	July 15 Quarterly Report	☐ March 20 ☐ July	y 20
46	October 15 Quarterly Report	☐ April 20 ☐ Aug ☐ May 20 ☐ Sep	gust 20
Г	January 31 Year End Report	Twelfth day report preceding	
	July 31 Mid Year Report (Non-election Year Only)		(Type of Election) in the State of
	Termination Report	•	ring the General Election o
(b)	Is this Report an Amendment? YES X NO		
	SUMMARY	COLUMN A	COLUMN B
Cov	ering Period 6/28/88 through 6/30/88	This Period	Calendar Year-to-Date
(a)	Cash on Hand January 1, 19_88	(earn	\$ -0-
(b)	Cash on Hand at Beginning of Reporting Period	\$ -0-	1 1 2 2 2
(c)	Total Receipts (from Line 18)	· \$ -0-	\$ -0-
(d)	Subtotal (add Lines 6(b) and 6(c) for Column A and	\$ -0-	\$ -0-
Tota	al Disbursements (from Line 28)	•	
	h on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	-0-	
	ts and Obligations Owed TO the Committee	\$ -0-	\$ −0− For further information
(Iten	nize all on Schedule C and/or Schedule D)	. \$ -0-	contact: Federal Election Commission
	ts and Obligations Owed BY the Committee nize all on Schedule C and/or Schedule D)	. \$ -0-	999 E Street, NW Washington, DC 20463
certify nd con	that I have examined this Report and to the best of my knowledge aplete.	and belief it is true, correct	
	Print Name of Treasurer Alvin J. Boutte		
	e of Treasurer		Date
	Il Ja Bonts		8/8/88
TE: Sub	omission of false, erroneous, or incomplete information may subject the pe	erson signing this Report to the	penalties of 2 U.S.C. §437g.

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FEC FORM 3X (revised 4/87)

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

Name of Committee (in full) Keep Hope Alive Political Action Committee	Report Covering the Period From: 6/28/88	To: 6/30/88	
I. RECEIPTS	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date	1
11. CONTRIBUTIONS (other than loans) FROM:	The second second		15
(i) Itemized (use Schedule A)	The state of the s	-0-	11(
(ii) Unitemized		-0-	110
(iii) Total of contributions from individuals		-0-	110
(b) Political Party Committees		-0-	_
(c) Other Political Committees (such as PACs)		-0-	110
(d) TOTAL CONTRIBUTIONS (add 11(a)(iii), (b), and (c)).	-0-	-0-	110
2. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES		-0-	12
3. ALL LOANS RECEIVED	STREET, STREET	-0-	13
14. LOAN REPAYMENTS RECEIVED	-0-	-0-	14
5. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	-0-	-0-	15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	-0-	-0-	16
7. OTHER RECEIPTS (Dividends, Interest, etc.)	-0-	-0-	17
18. TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)	-0-	-0-	18
II. DISBURSEMENTS	19.7		1
19. OPERATING EXPENDITURES	-0-	-0-	19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES	-0-	-0-	20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	-0-	-0-	21
22. INDEPENDENT EXPENDITURES (use Schedule E)	-0-	-0-	22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (use Schedule F).	-0-	-0-	23
24. LOAN REPAYMENTS MADE	-0-	-0-	24
25. LOANS MADE	-0-	-0-	25
26. REFUNDS OF CONTRIBUTIONS TO:			
(a) Individuals/Persons Other Than Political Committees	-0-	-0-	26(a
(b) Political Party Committees	-0-	-0-	26(b
(c) Other Political Committees (such as PACs)	-0-	-0-	26(c
(d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c))	-0-	-0-	26(d
7. OTHER DISBURSEMENTS	-0-	-0-	27
28. TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	-0-	-0-	28
III. NET CONTRIBUTIONS/OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans)(from Line 11(d))	-0-		29
30. TOTAL CONTRIBUTION REFUNDS (from Line 26(d))	-0-	-0-	30
31. NET CONTRIBUTIONS (other than loans)(subtract Line 30 from 29).	-0-		31
32. TOTAL OPERATING EXPENDITURES (from Line 19)	-0-	-0-	32
33. OFFSETS TO OPERATING EXPENDITURES (from Line 15)	-0-		33
	-0-	-0-	34
34. NET OPERATING EXPENDITURES (subtract Line 33 from 32)	0-	-0-	ĺ

Joseph Bravers:

dinner at church
proceeds from dinner
profits

Shiloh Baptist Church

300 people, 500 6/00 6/20/60

Clerk of church + trustee
fundaiser for II (not bee)
individual donations
advertised, closed out

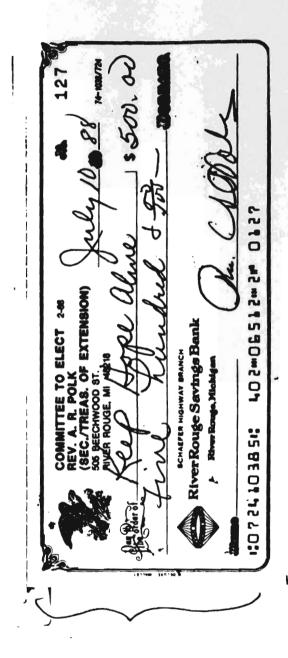
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9th + PSt., NW invitations, 1
25 per person advertising goods speaks

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	Thousand Mollaks	1	9
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SEV.7.15 19 18 H	L \$ [00.00]	Hims Flowery	1560603406#65
MID BROOKLYN POLITICAL ASSN. JAMES CONO //	ONDER OF HOLD Alive	MANUFACTURERS HANOVER TRUST COMPANY TOTAL INDEN BOULEVARD SROOKLYN, N. Y. 11207	FOR

- amind report on occupations

-> # Zto only

- Atlanta bank report -> amend report; letter form

- DNC for software for FEC

- pend back UNDP or chick on citizenship; corporate, citizen

- Friends of Jesse Jackson - #5,000? who
- confein that Brooklyn, Trice, Polk, Eddie Bernice - confein
less than \$1,000 ole; checke about corningled funds

Brian Hanarch

can call anytime check on "begani aut, transce? anissus to littus bearmi part of recer.

lcz.sc

- remeri "Friends of Jesse Jackson" from funds; don't accept in future

- policitation + mintion both accounts; assumption is for fed.

- one fund avoids state haroles

- administrativi ersts?

good start on " can amid statini of snys by litter, can xerox shirt

- try to remove differenceis (\$5,000 contribution ley)?

- submit computinged solidalis for approval (5-day process)

000011

- timely filing key! get something in; canget find - don't put II on fling; can use on litterhead; support candidate, not II for fed office; can't sew as bridge between campaigns + PAC can east mark denations as independent expenditures or in- Kind denations

Keep Hope Alive PAC 1074 Thomas Jefferson St. Washington, D.C. 20007 November 4, 1988 Mr. Cirilo A. McSween 230 S. State St. Chicago, Illinois 60604 Dear Mr. McSween, How are you? Well, I hope. I met with our analyst at the FEC for the Keep Hope Alive PAC, regarding our third quarter submission. made several suggestions for improving our report, which I talk about below. He also said that if we acted quickly to fix some of the inadequacies of the report, and sent him a letter to that effect right away, it would improve the report before he "officially" had a chance to review it. Therefore: *I have sent a letter out to all our donors over \$200, asking for their employer's name and occupation, which the FEC requires us to ask. *I have sent a letter to a woman who donated to us from Liberia, verifying that she is not a foreign national, since they are barred from donating to PACs. *I have identified the following steps that the PAC needs to take right away, which fall under your jurisdiction as PAC Treasurer (these are all related to problems which our FEC analyst noticed): 0 --We should transfer \$6,975.00 from our Federal PAC account to our Non-Federal PAC account. This will cover donations which may have included, unintentionally, corporate or union funds, such as the \$5,000 from the Friends of Jackson (address unknown); \$1,000 from Eddie Bernice Johnson; \$500 from the Committee to Elect Rev. A. R. Polk; \$250 from the John Wiley Price Campaign; \$100 from the Mid-Brooklyn Political Association; and \$125 from two small checks we received, possibly corporate. --We need the campaign to bill the PAC for the use of the list to mail our first batch of letters last July. --We need to add in the new information from the bank account in Atlanta, which I will be glad to do as soon as you can send it to me. --We need to send the FEC the attached letter to our analyst, Mr. Anthony Raymond, pointing out that we have taken all these steps. If you would sign this letter, and send it to me as soon as possible, I will complete the Atlanta information, and turn it in to the FEC immediately. Thanks. This should greatly improve our submission. Sincerely, stivi lebble 000012 Steve Cobble

Key Hoge iline PAC
733 15th At., N.W.; Luik # 700
Washington, D.C. 20005
Streember 6, 1988

Pin. livile U. Mahvan 230 d. State St. Chicago, Illinois 60604

Dea Mr. McLuen,

I hepe the Heliday Staven is finding you well.

Just about a month ago, I sent the originals of the attacked for reger your information and action. I have since received ne word on the status of this term, and I am getting concerned that we may seen jaci is midial action from the Fec. and you take a look at thise two letters. which are fairly sill - explanatory, and thin take the actions you diem appropriate? Try incommendations in rapid on mitigating likely Fec previous.

is would add one inspection to my previous after - a trick it makes serve for you - close the Itlanta bank account (I discussed the rest of here in inner in account years and transpects of remarks one for the rest of the me that is serve in the server of the server of

you will note that my office address how him changed - the star executes through his to have moved into our old purding, were regions 122 years. There will be signed the attorned to me at the alternation. An atthree a suggest number older to loss.

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BOEC 15 MI 9 SZ

Movember 9, 1988 Keep Hope Alive Political Action Committee 1074 Thomas Jefferson St. Washington, D.C. 20007

Mr. Anthony D. Raymond Senior Analyst Federal Election Commission 999 E Street, N.W. Washington, D.C. 20463

Dear Mr. Raymond,

This letter will amend the third quarter report of the Keep Hope Alive Political Action Committee. We have undertaken the following steps since the submission of that report, in order to rectify some inadequacies in the original submission:

*We have sent out a letter from the PAC to all those donors who gave over \$200, asking them their employer's name and their occupation (a copy of this letter is attached).

"We have sent a letter to Ms. Beverlee Bruce, Ph.D., asking if the \$50 she gave us was personal, and asking her to verify that she is a citizen.

*We have added in the activity from the Atlanta bank account established at the time of the Democratic Mational Convention, which was inadvertently left off of the first third quarter report. (These new figures are attached.)

*We have transferred \$6,975 from our Federal funds account to our Non-Federal funds account, while we work to verify the source of the money donated by the following groups--\$5,000 from Friends of Jackson; \$100 from the Mid-Brooklyn Political Association; \$500 from the Committee to Elect Rev. A. R. Polk; \$250 from the John Wiley Price Campaign; and \$1,000 from Eddie Bernice Johnson; and another \$125 to cover two checks which may be corporate.

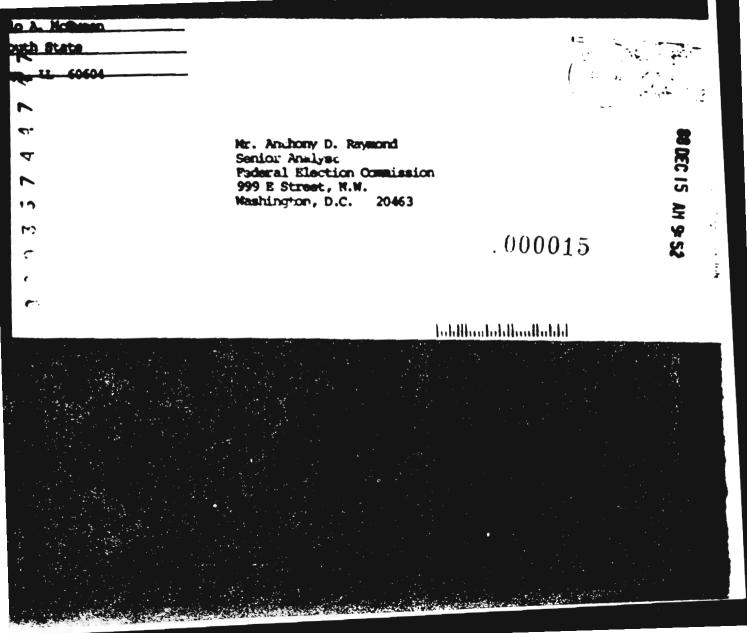
We trust this improves our submission. In the future, we will endeavor to file timely, complete, and accurate reports, particularly as we gain more experience in the FEC/PAC process. Thank you for your assistance in this matter.

Sincerely

Cirilo A.

Treasurer

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REPORT OF RECEIPTS AND DISBURSEMENTS

or Other Than An Authorized Committee

(Summary Page)

1. NAME OF COMMITTEE (In full) USE FEC MALLIN" - VBEL OR TYPE OR PRINT Keep Hope Alive Political Action Committee
ADDRESS (number and street) Check it different than De Check if different than previously reported 2007

(a) April 15 Quarterly Report

	C 00.	229.28	6		
3.	This common committee on	DURING	ified as	Reporting	ndida Perio date).

October 20

(revised 4/87)

2. FEC IDENTIFICATION NUMBER

Monthly Report Due On:

☐ February 20 ☐ June 20

4. TYPE OF REPORT

	July 15 Quarterly Heport		☐ March 20	☐ July 2	0 🗆	November 20
			☐ April 20	☐ Augus		December 20
	October 15 Quarterly Report		☐ May 20	☐ Septer	mber 20 🗆	January 31
	January 31 Year End Report		Twelfth day report	preceding _	a Arrêt	
					(Type of	and the second second
	July 31 Mid Year Report (Non-ele	ection Year Only)	election on	-	in the State of	f
			Thirtieth day rep	ort following	the Genera	al Election on
	Termination Report		Actimber 8th	in the State	or U.S.	
	(b) Is this Report an Amendment?	YES NO				
	SUMMA	RY	COLUM	N.A.	COLL	MN B
5 .	Covering Period Cotolor 1	through Action 28 1988			Calendar Y	
6.	(a) Cash on Hand January 1, 19 🔌				\$ C.00	
	(b) Cash on Hand at Beginning of Re	eporting Period	\$ 196,017	.18		
	(c) Total Receipts (from Line 18) .		\$ 2,968	کئی	\$,222,3	PS. 73
	(d) Subtotal (add Lines 6(b) and 6(c) Lines 6(a) and 6(c) for Col		\$ 198.98		\$ 323.36	
7.	Total Disbursements (from Line 28)			10,51	. '	4C 21
8.	Cash on Hand at Close of Reporting Per	riod (subtract Line 7 from Line 6(d	,	5.53	•	95,53
9.	Debts and Obligations Owed TO the Co (Itemize all on Schedule C and/or Schedule C			.66	For further in contact:	
10.	Debts and Obligations Owed BY the Co (Itemize all on Schedule C and/or Schedule C		\$ C	,00	999 E Street, Washington,	
	certify that I have examined this Repor nd complete.	rt and to the best of my knowle	dge and belief it is tru	e, correct	Toll Free 800 Local 202-370	
Ту	ype or Print Name of Treasurer					
Si	gnature of Treasurer				Date	
	TE. Cubmission of lake a series and a series	amplete information may subject the	o correct sign at the De	and to the se	nalties of 2 III	S C 64272
NOI	TE: Submission of false, erroneous, or inco	implete information may subject the			1 ===	
			000	0016	LEC	FORM 3X

OFTAILED SUMMARY PAGE of Receipts and Diebursements

(Page 2, FEC FORM 3X) Name of Committee (in full)	Report Covering the Period		7
Keep Hope Alive Political Action Committee COC229266	From: Cotober	To: Nevember 28, 1988	
TOUR THE COURSE HOTION CONMITTEE COURTERED	COLUMN A	COLUMN B	1
I. RECEIPTS	Total This Period	Calendar Year-To-Date	1
1. CONTRIBUTIONS (other than loans) FROM:	12.	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	
(a) Individuals/Persons Other Than Political Committees		A Charles	1
(i) Itemized (use Schedule A)	215.00	79,715.00 7	11
(ii) Uniternized (poder sales)	2,243.15	135,016,54 5 2]"
(iii) Total of contributions from individuals	2518.15	214, 731, 54 - 318	יי[
(b) Political Party Committees	0.00	6,950.00]"
(c) Other Political Committees (such as PACs)	0.00	0.00]"
(d) TOTAL CONTRIBUTIONS (add 11(a)(iii), (b), and (c))	2.515.15	221 681.54]"
2. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES	0	0	12
13. ALL LOANS RECEIVED		C C	13
14. LOAN REPAYMENTS RECEIVED	C	C	14
5. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	6	c	15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES	DESCRIPTION OF STREET	ACTOR TO BE SEED OF THE SEED O	
AND OTHER POLITICAL COMMITTEES	C		16
17. OTHER RECEIPTS (Dividends,Interest, etc.)	45C, 1C	704.19	17
18. TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)	2 91825	222.385.13	18
II. DISBURSEMENTS			1
19. OPERATING EXPENDITURES . (direct mail Merk, salaries, book work).	18.290,51	41,690,21	19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES	Ú	C	20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER	TO BE A POST OF A TOP OF THE PERSON	A CONTRACTOR OF THE CONTRACTOR	21
POLITICAL COMMITTEES	Record Address of parties the court	10 No. of the Co. of the Co.	┫
22. INDEPENDENT EXPENDITURES (use Schedule E)	r	c	22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES	10 000 100 100 100 100 100 100 100 100	are and the second	4
(2 U.S.C. 441a(d)) (use Schedule F).	С	c	23
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24. LOAN REPAYMENTS MADE	C	C	24
25. LOANS MADE	The state of the s	THE PERSON OF TH	4
	L	C	25
26. REFUNDS OF CONTRIBUTIONS TO:	TO SEE TO SEE THE		4
(a) Individuals/Persons Other Than Political Committees] 26
(b) Political Party Committees.			26
(c) Other Political Committees (such as PACs)			26
(d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c))	C	(26
27. OTHER DISBURSEMENTS	С	c	27
28. TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d)			1
and 27)	18, 290, 51	41.696,21	28
III. NET CONTRIBUTIONS/OPERATING EXPENDITURES	an which is a second	数据的种种的数据的	1
9. TOTAL CONTRIBUTIONS (other than loans)(from Line 11(d))	2,518,15	.221, 681,54	29
0. TOTAL CONTRIBUTION REFUNDS (from Line 26(d))	0,00	0.00	30
11. NET CONTRIBUTIONS (other than loans)(subtract 'ine 30 from 29).	2,518.15	221,681,57	31
	· 经现代的 中国		
2. TOTAL OPERATING EXPENDITURES (from Line 19)	18,290,51	41, 676, 21	32
3. OFFSETS TO OPERATING EXPENDITURES (from Line 15)	6.11	6,50]33
34. NET OPERATING EXPENDITURES (subtract Line 33 from 32)	18.390,51	41 876, 21	734

100017



esch category of the Detailed Summery Page FOR LINE NUMBER

Leep Hope Alive Political Action Committee A. Full Namo, Mailing Address and ZIP Codo Hazel F. Chey P.C. Rox 6095	Name of Employer Texas Albrney General	Date (month, day, year)	Amount of Eac Receipt this Peri	
Receipt For: Primary J General	Occupation Lawyer	10/26/88	275.00	
Other (specify): (Total)	Aggregate Year-to-Date >\$ 525,	00		
S. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Eac Receipt this Per	
Receipt For: Primary General	Occupation			
Receipt For: Primary General Other (specify):	Aggregate Year-to-Date >\$			
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Ea Receipt this Per	
	Occupation			
Receipt For: Primary General Other (specify):	Aggregate Year-to-Date >\$			
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Ea Receipt this Per	
Receipt For: Primary General	Occupation	-		
Cther (specify):	Aggregate Year-to-Date \$			
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Ea Receipt this Per	
	Occupation			
Receipt For: Primary General Other (specify):	Aggregate Year-to-Date >\$			
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Ea Receipt this Per	
Receipt For Primary General	Occupation	-		
Other (specify)	Aggregate Year-to-Date \$			
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Eac Receipt this Per	
Receipt For: Primary General	Occupation	1		
Other (specify)	Aggregate Year-to-Date \$			
TAL of Receipts This Page (optional)	$\alpha \alpha \alpha \alpha \alpha^{2}$	X		

Ue C	rate schedule(s)
TOP TO	Category of the Summary Page
Detellen	SOUMING A LANG

PAGE	OF
FORLI	NE NUMBER
	19

Keep Hope Alive Tolitical Action Comm	Hee C CC229286	Date (month	Amount of Each
Frank Clemente	work on book	dey, year)	Disbursement This Period
1869 Mintwood Place, N.W.	Disbursement for: Primary V General Other (specify)	11/11/28	6,803.75
B. Full Name, Mailing Address and ZIP Code Skery Losser & Associates	Purpose of Disbursement direct mail work	Date (month, day, year)	Amount of Each Disbursement This Period
233 E. Lincker Pr., # 907 Chicago, Illinois 66661	Disbursement for: Primary General Other (specify)	11/11/68	4,500.00
C. Full Name, Mailing Address and ZIP Code Cary I Terrell	Purpose of Disbursement (ist Collection	Date (month, day, year)	Amount of Each Disbursement This Period
1917 E. Myrna lane Tempe, Arizona 85.284	Disbursement for: Primary General Other (specify)	11/16/88	325.00
D. Full Name, Mailing Address and ZIP Code Nicke Terry	Purpose of Disbursement list collection	Date (month, day, year)	Amount of Each Disbursement This Period
2136 19th St. Roulder Colorado 80302	Disbursement for: Primary V General Other (specify)	11/18/28	537.00
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Sclasy	Date (month, day, year)	Amount of Each Disbursement This Period
4810 N 3rd St. Arlington, Virginia 22203	Disbursement for: Primary General Other (specify)	11/10/28	3,500.00
F. Full Name, Mailing Address and ZIP Code Lis Tothinan	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
5711 75114 11111	back editing	33///33//	
1869 Mintwood Mace, All	Disbursement for: Primary # General Other (specify)	11/18/28	647.30
G. Full Name, Mailing Address and ZIP Code Shead's & Associates	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
3449 Williamsburg Princ Ivaldont, Manyland 20601	Disbursement for: Primary General Other (specify)	11/18/88	1,977.46
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: Primary General Other (specify)		
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
,	Disbursement for: Primary General Other (specify)		
TOTAL of Disbursements This Page (optional)			18,290.51
AL This Period (last page this line number only)			18 326 31

REPORT OF RECEIPTS AND DISBURSEMENTS

or Other Than An Authorized Committee

USE FEC MAILING LABEL
OR
TYPE OR Phar

2 + 0-4-0-3 3 3-6-9 5

Wastington , D.C.

20007

4. TYPE OF REPORT

This committee qualified as a multicandidate committee DURING THIS Reporting Period

(date).

	(a)	April 15 Quarterly Report	Mont	hly Report Du	e On:	
		July 15 Quarterly Report		February 20 March 20	1 1000	ne 20
	-			April 20	□ Au	gust 20 🔲 December 20
	J	October 15 Quarterly Report		May 20	☐ Se	ptember 20 January 31
		January 31 Year End Report	Twelf	th day report	precedin	0
		t to 24 Mid Very General (Non planting Very Collin				(Type of Election)
		July 31 Mid Year Report (Non-election Year Only)	electi	on on		in the State of
			Thirti	eth day rep	ort follow	wing the General Election on
		Termination Report			in the St	ate of
	(b)	Is this Report an Amendment? YES Y				
		SUMMARY		COLUM		COLUMN B
5 .	Cove	ering Period July 1 through Septembry 30,1985		This Per		Calendar Year-to-Date
6.	(a)	Cash on Hand January 1, 19 38	-			\$ 0
	(p)	Cash on Hand at Beginning of Reporting Period	. \$	C		
	(c)	Total Receipts (from Line 18)	. \$	214,417	.48	\$ 24,417.48
	(d)	Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	. \$	219,417.	16	\$ 219,417.48
7.	Total	Disbursements (from Line 28)	\$	23,371.	.70	\$ 23,349.70
8.	Cash	n on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$	196,017.	78	\$ 196,017.78
9.		s and Obligations Owed TO the Committee nize all on Schedule C and/or Schedule D)	. \$	C.	00	For further Information contact:
10.		s and Obligations Owed BY the Committee nize all on Schedule C and/or Schedule D)	. \$	Ĉ.	00	Federal Election Commission 999 E Street, NW Washington, DC 20463
	certify t	that I have examined this Report and to the best of my knowledge oplete.	and I	belief it is tru	e, corre	
Ту	pe or P	rint Name of Treasurer				
Si	gnature	of Treasurer				Date
	_					
NOT	TE: Sub	imission of false, erroneous, or incomplete information may subject the pe	erson s	igning this Re	port to the	e penalties of 2 U.S.C. §437g.
			()	0002	1	FEC FORM 3X

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

tame of Committee (in full) Keep Hope Alive Political Action Committee COCHARASE	Report Covering the Period From: July	To: September 30, 1988	1
I. RECEIPTS	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date	
1. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees (i) Itemized (use Schedule A)	70 444 04	20.444.44	١.
(ii) Unitemized	79,440.0c	19,440.00	┦;
(iii) Total of contributions from individuals	212, 213, 34	212,213,39	٦,
(b) Political Party Committees	6.950.00	6.950.00	٦,
(c) Other Political Committees (such as PACs)	6,00	0.00	٦,
(d) TOTAL CONTRIBUTIONS (add 11(a)(iii), (b), and (c))	219.163.39	219.163.39	٦,
2. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES	C	0	,
3. ALL LOANS RECEIVED	0	0	,
4. LOAN REPAYMENTS RECEIVED	0	0	1
5. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	G		
6. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES	CARLES TO SERVE.		┪"
AND OTHER POLITICAL COMMITTEES	0	0	31
7. OTHER RECEIPTS (Dividends,Interest, etc.)	254.07	254.09],
8. TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)	219,417.48	219,417.48	,,
II. DISBURSEMENTS	THE STREET	学習者が必然である。 (1994年)	
3. OPERATING EXPENDITURES. Payments to brink, direct mail,	23,371.70	23,314.70],,
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES	. с	С	21
1 CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	C	0	21
22. INDEPENDENT EXPENDITURES (use Schedule E)	0	0	22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (use Schedule F).	0	C	2:
24. LOAN REPAYMENTS MADE	C	C	24
25. LOANS MADE	C	CONTRACTOR OF A PART	2:
26. REFUNDS OF CONTRIBUTIONS TO:	THE RESERVE OF THE PARTY.	CONTRACTOR OF THE PARTY OF THE	
(a) Individuals/Persons Other Than Political Committees			24
(b) Political Party Committees.			26
(c) Other Political Committees (such as PACs)			24
(d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c))	0	0]≈
7. OTHER DISBURSEMENTS	C	c	27
8. TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	23,394.70	· 23,391.70	22
III. NET CONTRIBUTIONS/OPERATING EXPENDITURES	A TO THE STATE OF	North Strain Strain Co. St.	
9. TOTAL CONTRIBUTIONS (other than loans)(from Line 11(d))	214, 163, 37	219,163,39]25
0. TOTAL CONTRIBUTION REFUNDS (from Line 26(d))	4,00	0.00]30
1. NET CONTRIBUTIONS (other than loans)(subtract Line 30 from 29)	28.113.37	219, 163, 39	31
2. TOTAL OPERATING EXPENDITURES (from Line 19)	23, 3-17, 70	13 371.70]32
33. OFFSETS TO OPERATING EXPENDITURES (from Line 15)	' C .: C]33
34. NET OPERATING EXPENDITURES (subtract Line 33 from 32)	3 317.70	27 319.70	34

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A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month,	Amount of Eac
Hayward R. Alker, Jr.		day, year)	Receipt this Per
28% Mill St.		8/20/83	244 44
Newtonville, Massichusetts (2160	Occupation	- olanies	200.00
Receipt For Primary J General			46.5
Other (specify): B. Full Name, Mailing Address and ZIP Code	Aggregate Year-to-Date \$	260.00	
Ms. Elizabeth Ader	Name of Employer	Date (month, day, year)	Amount of Eac Receipt this Peri
9 Barrington Dr.			4.0
Wheatley Heights, New York 11798		7/30/86	500.00
Receipt For: Primary / General	Occupation		171-7
Other (specify):	Aggregate Year-to-Date >\$	Sec	1
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month,	Amount of Eac
Charles R. Railey		day, year)	Receipt this Peri
32c & 43rd 54.		8/2/88	•
New York, New York 10017	Occupation	0/2/00	250.00
Receipt For: Primary V General Other (specify):	Aggregate Year-to-Date >\$		
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month,	Amount of Eac
Stuart G. Ballin	The state of the s	day, year)	Receipt this Per
34 Describire Road			
New Roclette, New York 10824	Occupation	7/25/8i	.200.00
Receipt For Primary J General			
Other (specify):	Aggregate Year-to-Date >\$.S00	
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Eac Receipt this Per
Rev. J. J. Rentley		007, 70017	neceipt this Per
415 Frakerick Avenue		8/2/83	500.00
Daytona Banch, Florata 32014	Occupation		300,00
Receipt For. Primary J General	Aggregate Year-to-Date \$	366	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month,	Amount of Eac
Mb. Ann K. Bower		day, year)	Receipt this Peri
13 Turtle Creek		باريات	
Dalles Texes 75264	Occupation	7/ સ (ક્રિ	200.00
Receipt For Primary General			
Other (specify)	Aggregate Year-to-Date \$	260	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Eac Receipt this Peri
Bernice Barton		227, 7501,	ricceipt tins Per
93 Prespect Ave. Gibsen Ave.		<u> </u>	200.00
Whate Plains, New York 1866?	Occupation		αω.υ.
Receipt For. Primary v General Other (specify):	Aggregate Year-to-Date >\$.200	
	133.4	-AVA	

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FOR LINE NUMBER

PAGE

A. Full Name, Mailing Address and 7IP Code	Name of Employer	Date (month, day, year)	Amount of Ea
Bill Rushnell			The state of the s
621 South Spring St.		8/15/85	250.00
Receipt For: Primary / General	Occupation	E 19	
Other (specify):	Aggregate Year-to-Date > \$	250	
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month,	Amount of Eac
Elizabeth R. Cocke		day, year)	Receipt this Per
Shore Road		7/26/88	200.00
Remsenburg, New York 11960	Occupation		200.00
Receipt For: Primary	A		
C. Full Name, Mailing Address and ZIP Code	Aggregate Year-to-Date > \$ Name of Employer	Date (month,	
Calvin E. Curningham	Marine Or ChibioAst	day, year)	Amount of Ear F.eceipt this Per
182 hover Road			
New Rochelle, New York 10804	Occupation	7/28/83	200,00
Receipt For: Primary J General	- Cooperion		
Other (specify):	Aggregate Year-to-Date >\$	2000	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month,	Amount of Eac
brank J. Darby, Jr.		day, year)	Receipt this Per
917 E. Curtis		7/2/18	.200.00
Receipt For Primary J General	Occupation	1/26/03	300.00
Receipt For Primary J General Cther (specify):	Aggregate Year-to-Date > \$		
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month,	Amount of Ear
Ms. Cassandra Ford		day, year)	Receipt this Per
4140 Nest 136 th St.		, ,	
Robbers Illinou 66472	Occupation	7/26/85	200.00
Receipt For: Primary V General	Occupation	' '	
Other (specify):	Aggregate Year-to-Date > \$	-360	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month,	Amount of Eac
Kail D. Gregery		day, year)	Receipt this Per
18445 Adrian Dr		7/25/86	350 00
Southfield, Michigan 45075	Occupation	11.23/88	450.00
Receipt For Primary J General Other (specify)	Aggregate Year-to-Date >\$	303	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month,	Amount of Eac
Ms. Kazel Groffin		day, year)	Receipt this Peri
36 Martence St.		11	
Broatlyn, New York 11-2-26	Occupation	1/26/83	£50.08
Receipt For. Primary / General	Scrapellon		5.00
	Aggregate Year-to-Date >\$.22.	

FOR LINE NUMBER

Leep Hope Alive Political Action Committee	Name of Employer	Date (month,	Amount of E
Ms. Lillian B. Handy		day, year)	Receipt this f
7842 Belleflower Dr		which a	
Springfield, Virginia 22152	Occupation	7/26/88	200.00
Receipt For: Primary V General			
Other (specify): 8. Full Name, Mailing Address and ZIP Code	Aggregate Year-to-Date >\$ 200		T -
Ms. Elizabeth Harris	Name of Employer	Date (month, day, year)	Amount of E Receipt this P
13 Hoover Road		.11	
Hingham, Massachusetts C2C43	Occupation	8/1/88	400.0
Receipt For: Primary J General	Occupation		
Other (specify):	Aggregate Year-to-Date >\$ 400		Res A
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month,	Amount of E
Bethy J. Hedges		day, year)	rioceipt this P
Old Route 202, Ladentoin		8/3/88	300.00
Receipt For: Primary V General	Occupation	01.,100	
Receipt For: Primary General Other (specify):	Aggregate Year-to-Date > \$ 300		
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month,	Amount of E
Amy Mina Henda and Wayne O'Neil		day, year)	Receipt this P
Army Maya Henda and Wayne O'Neil 31 Baurneside St.		aliles	
Develoster Massachuatts C2124 Receipt For Primary J General	Occupation	8/4/88	200.0
Cther (specify):	Aggregate Year-to-Date >\$ 20;		
E. Full Name, Mailing Address and ZIP Code No. Eleanor Linzoln Voluson	Name of Employer	Date (month, day, year)	Amount of E Receipt this P
105 N. Palmer			
	0		500.00
Faucticville Arkansis (270) Receipt For: Primary & General	Occupation		750,00
Other (specify)	Aggregate Year-to-Date >\$ STC		
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month,	Amount of E
Ms. Tamara Kerr 246 Pt. 32 N.	لا ملحمه کان	day, year)	Receipt this P
ECS tifth frame, Surte 307 Niew Patte, NY	self-einployed	7/22/88	744 4
Receipt For: Primary V General	Occupation artist/composer	(Jailor	, ૩૮૪, ૯
Receipt For: Primary General Other (specify):	Aggregate Year-to-Date >\$ 327	<u></u>	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month,	Amount of E
Ms. Karen Kolling		day, year)	Receipt this P
103.2 Forest Ave.		7/20/20	
Palo Alto, California 94301	Occupation	7/28/88	200.00
Receipt For: Primary v General			
Other (specify'	Aggregate Year-to-Date >\$ 25		

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A. Full Name, Mailing Address and ZIP Gode Ms. Ivene B. Lane 93 Prespect Ave.	Name of Employer	Date (month, day, year)	Amount of Receipt this f
Receipt For: Primary General	Occupation	8/15/88	300.00
Other (specify):	Aggregate Year-to-Date >\$	366	
B. Full Name, Mailing Address and ZIP Code Ms. Juanifa I, Lewis 5101 Presidic Pr.	Name of Employer	Date (month, day, year)	Amount of E Receipt this P
Los Angilies, Valtornia 90093 Receipt For: Primary 1 General	Occupation	(1/20100	ACC. 00
Other (specify):	Aggregate Year-to-Date >\$	200	ALC:
C. Full Name, Mailing Address and ZIP Code Ms. Ruth A. Lockhart 830 Lafayette St.	Name of Employer	Date (month, day, year)	Amount of E Receipt this Po
Receipt For: Primary / General	Occupation	7/21/63	ટડે. લ
Other (specify):	Aggregate Year-to-Date >\$	252	
D. Full Name, Mailing Address and ZIP Code Timothy B. Muher P. C. Box 271865	Name of Employer	Date (month, day, year)	Amount of E Receipt this P
P. C. Day Clinis Houston, Texas 77277 Receipt For Primary V General	Occupation	7/28/83	1,000.0
Cther (specify):	Aggregate Year-to-Date >\$	1.000	
E. Full Name, Mailing Address and ZIP Code Ms. Elizabeth Münsfield 186 Church St.	Name of Employer	Date (month, day, year)	Amount of E Receipt this Po
New Reclette, New York 10805 Receipt For Primary & General	Occupation	1/.26/65	200.00
Other (specify).	Aggregate Year-to-Date > S	360	
F. Full Name, Mailing Address and ZIP Code No. General H. Nie Gee	Name of Employer	Date (month, day, year)	Amount of E Receipt this Po
440 Rallyclare Terraci Cincunnati, Chic 45240	Occupation	s/i/s	250,00
Receipt For Primary General			
Other (specify):	Aggreyate Year-to-Date > \$		
G. Full Name, Mailing Address and ZIP Code Dolvald C. Milyas 20. 20. 20. 20. 20. 20. 20. 20. 20. 20.	Name of Employer	Date (month, day, year)	Amount of Ea Receipt this Pe
P.C. Box 1342 Front Poul Vernice 32630 Receipt For: Primary / General	Occupation	3/1/88	100,00
Receipt For: Primary of General her (specify):	Aggregate Year-to-Date > \$	700	
TAL of Receipts This Page (optional)	T AALCAGE LEGITO. Date 2	THE STATE OF THE S	3,100.10

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FOR LINE NUMBER

Keep Hope Alive Political Action Committee A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month,	Amount of E
Ms. Maya Miller		day, year)	Receipt this Pe
6185 Franktown Read			
Carson City Nevado 89701	Occupation	1/25/58	2,000.0
Receipt For: Primary J General			
Other (specify):	Aggregate Year-to-Date >\$	2600	
B. Full Name, Mailing Address and ZIP Code Evic L. Montague 3518 14th Avenue	Name of Employer	Dete (month, day, year)	Amount of Ea Receipt this Pe
Calland California 94602 Receipt For: Primery / General	Occupation	(/26/26	200.00
Other (specify):	Aggregate Year-to-Date \$	30C	
C. Full Name, Mailing Address and ZIP Code Tohn Missilin R.R. 2, Rex 144-A	Name of Employer	Date (month, day, year)	Amount of Ea Receipt this Pe
Receipt For: Primary General	Occupation	(1.50/68	250,00
Other (specify):	Aggregate Year-to-Date \$	30	
D. Full Name, Mailing Address and ZIP Code Liston C. Nichelsen P. L. Fex 255	Name of Employer	Date (month, day, year)	Amount of Ea Receipt this Pe
hist Rienthized, New York 11717 Receipt For Primary V General	Occupation *		450.ce
Cther (specify):	Aggregate Year-to-Date >\$	452	
E. Full Name, Mailing Address and ZIP Code No. Ahn V. Schehfler 223 2. 78 5 St., # 2-A	Name of Employer	Date (month, day, year)	Amount of Ea Receipt this Pe
New York, New York 10021 Receipt For: Primary Seneral	Occupation	7/21/88	250.00
Other (specify):	Aggregate Year-to-Date \$	352	
F. Full Name, Meiling Address and ZIP Code Ms. Rette Shulman	Name of Employer	Date (month, day, year)	Amount of Ea Receipt this Pe
Rural Delivery #1, Bex 77		7/27/88	1 200 00
Receipt For: Primary 4 General	Occupation		1,200.00
Other (specify):	Aggregate Year-to-Date >\$	1.360	
G. Full Name, Mailing Address and ZIP Code Als Diane Meyer Silven	Name of Employer	Date (month, day, year)	Amount of Ea Receipt this Per
8765 Pine Ridge Di		7/28/88	1
Receipt For: Primary / General	Occupation		1,000.00
Other (specify):	Aggregate Year-to-Date >\$	1,666	
TAL of Receipts This Page (optional)			5,350.00

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	siled Summary Page	

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BER

A. Full Name, Mailing Address and ZIP Code Charles A. Starks 3828 Highland Ave.	Name of Employer	Dete (month, dey, year)	Amount of Ea Receipt this Per
Chattavooga, Tehnessee 37410 Receipt For: Primary / General	Occupation		500,00
Other (specify):	Aggregate Year-to-Date >\$	SDE	
B. Full Name, Mailing Address and ZIP Code Joseph A. Tamaliunas 67 Marrei St.	Name of Employer	Date (month, day, year)	Amount of Ea Receipt this Per
Saratoga Springs, New York 12866 Receipt For: Primary V General	Occupation	(1-<6/00	250.00
Receipt For: Primary General Other (specify):	Aggregate Year-to-Date > \$	10	Direct 15
C. Full Name, Mailing Address and ZIP Code Jerry H. Travis 3676 East Livingston Ave., Apt. 27	Name of Employer	Date (month, day, year)	Amount of Ea Receipt this Per
Columbus, Chio 43227 Receipt For: Primary V General	Occupation	7/27/88	300,00
Other (specify):	Aggregate Year-to-Date >\$	300	1
Dun M. T. Kai Rural Route 1, Rex 38;	Name of Employer	Date (month, day, year)	Amount of Ea Receipt this Per
Receipt For Primary J General	Occupation	(126/00	300,00
Other (specify):	Aggregate Year-to-Date >\$	250	
E. Full Name, Mailing Address and ZIP Code Reviews live, M.P. Rose 75, R. R. 4	Name of Employer	Date (month, day, year)	Amount of Ea Receipt this Pe
hatertown, New York 13661 Receipt For: Primary J General	Occupation	, , , , , , , , , , , , , , , ,	450.00
Receipt For: Primary J General Other (specify).	Aggregate Year-10-Date >\$.250	1
F. Full Name, Mailing Address and ZIP Code Mrs. Windred E. Lucter 4415 St. Avenue, N. E.	Name of Employer	Date (month, day, year)	Amount of Ea Receipt this Pe
Seatle lissungton 98165 Receipt For Primary / General	Occupation	1/25/88	500,0
Other (specify):	Aggregate Year-to-Date >\$	3 7;	İ
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Ea Receipt this Per
Receipt For Primary General	Occupation		
Central Central	Aggregate Year-to-Date		1

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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.

ME OF COMMITTEE (in Full)

9534 S. Paxton Chicago, Ill. 60617 Receipt For: Primery X General Other (specify): B. Full Name, Mailing Address and ZIP Code Eonidas H. Berry, M.D. 5142 S. Ellis Ave. Chicago, Illinois 60615	Occupation Aggregate Year-to-Date > \$ Name of Employer	7/13/88 500 Date (month.	\$500.00
Receipt For: Other (specify): B. Full Name, Mailing Address and ZIP Code Eonidas H. Berry, M.D. 5142 S. Ellis Ave. Chicago, Illinois 60615	Aggregate Year-to-Date >\$		
Other (specify): 8. Full Name, Mailing Address and ZIP Code Eonidas H. Berry, M.D. 5142 S. Ellis Ave. Chicago, Illinois 60615			
Eonidas H. Berry, M.D. 5142 S. Ellis Ave. Chicago, Illinois 60615	Name of Employer	Date (month	franco-4-12
		7/10/88	Amount of Ea Receipt this Per \$250.00
	Occupation		2
Receipt For: Primary X General	Doctor		34-36
Other (specify):	Aggregate Year-to-Date > \$	গ্ৰ	
C. Full Name, Mailing Address and ZIP Code Dr. K. Middleton Brown	Name of Employer	Date (month, day, year)	Amount of Ea Fieceipt this Per
287 Barfield Avenue, S.W.	12 - 772	7/11/88	\$1,000.
Atlanta, GA 30310	Occupation		
Receipt For: Primary X General	Doctor		
Other (specify):	Aggregate Year-to-Date >\$	1,600	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month,	Amount of Ea
David C. Coleman, Jr.		day, year)	Receipt this Pe
-Geneva B. Coleman		7/10/88	\$1,000.
1035 E. 49th St. Chicago, Ill. 60615	Occupation		+ + , 000.
Receipt For: Primary X General			
Other (specify):	Aggregate Year-to-Date >\$	1,000	
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month,	Amount of Ea
James W. Compton		day, year)	Receipt this Per
-		7/13/88	\$500.00
	Occupation		
Receipt For Primary X General			
Other (specify)	Aggregate Year-to-Date > \$	500	
F. Full Name, Mailing Address and ZIP Code Secil Wayne. Coneletcher Cone The Cone	Name of Employer	Date (month, day, year)	Amount of Ea Receipt this Per
2955 Ribault Scenic Dr.		7/10/88	\$1,000.0
Jacksonville, FL 32208	Occupation	//10/00	VI,000.0
Receipt For Primary X General			
Other (specify):	Aggregate Year-to-Date >\$	1,600	
G. Full Name, Mailing Address and ZIP Code Floyd H. Flake	Name of Employer	Date (month, day, year)	Amount of Eac Receipt this Per
Maryaret Flake		6/12/88	\$1,000.0
130-46 Laurelton Parkway Rosedale, NY 11420	Occupation		+1,000.0
Receipt For: Primary & General			
Other (specify):	Aggregate Ye Date >\$,000	
TAL of Receipts This Page (optional)			C 100 A
			5, 350,00

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AME OF COMMITTEE (In Full)

A. Full Name, Mailing Address and ZIP Code John H. Adams Dolly D. Adams	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
209 Stoneham Lane		7/10/88	\$1,000.0
McLean, Virginia 22101 Receipt For: Primary X General	Occupation	2.3	
Other (specify):	Aggregate Year-to-Date >\$	1,000	
B. Full Name, Mailing Address and ZIP Code Revor Mrs. C.C. Akins Box 134	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Gillett, AR 72055		7/11/88	\$250.00
Receipt For: Primary X General Other (specify):	Preacher Aggregate Year-to-Date > \$ 4		
C. Full Name, Mailing Address and ZIP Code Vinton R. Anderson Vivienne L. Anderson 7748 Peach Tree Lane	Name of Employer	Date (month, day, year) 7/10/88	Amount of Each Fieceipt this Period
University City, MO 63180 Receipt For: Primary General	Occupation		
Other (specify):	Aggregate Year-to-Date >\$	500.00	
D. Full Name, Mailing Address and ZIP Code Vinton R. Anderson	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
7748 Peach Tree Lane	Occupation	7/10/88	\$500.00
University City, MO 63180 Receipt For: Primary y General	Occupation •	1	
Cther (specify):	Aggregate Year-to-Date \$	1,000,00	
E. Full Name, Mailing Address and ZIP Code Vinton R. Anderson	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
-Vivienne L. Anderson 7748 Peach Tree Lane		7/10/88	\$1,000.0
University City, MO 63180 Receipt For: Primary & General	Occupation		
Other (specify):	Aggregate Year-to-Date > S	2,000,00	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Dr. Leroy Attles, Sr. 10 Scahill Drive		7/10/88	\$1,000.00
Randolph, MA 02368 Receipt For Primary & General	Occupation		
Other (specify).	Aggregate Year-to-Date >\$ /	000	
G. Full Name, Majling Address and ZIP Code Roy W. or Lucille J. Bentley	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
3537 Hunters Pace Dr. Lithonia, GA 30038		8/14/88	\$1,000.00
Receipt For: Primary General Other (specify):	Occupation orregate Year-to-Date \$ 1		
Other Ispectivy.	Tregate Vear-to-Date 3	1200	
FAL of Receipts This Page (optional)			5,250

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.. AME OF COMMITTEE (in Full)

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month,	Amount of
Dorothye H. Boswell		day, year)	Receipt this
2170 W. 27th St.		7/10/88	\$200.0
Los Angeles, CA 90018	Occupation		
Receipt For: Primary X General			40.1
Other (specify):		200	
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Receipt this f
Clara L. Brown 1876 S. Sedalia Circle		7 (05 (00	
Aurora, Colo. 80017	•	7/25/88	\$500.0
Receipt For: Primary X General	Occupation		
Other (specify):	Aggregate Year-to-Date >\$	Cho	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month,	Amount of I
Dr. K. Middleton Brown		day, year)	Fieceipt this F
287 Barfield Avenue, S.W.		7/11/88	\$1,000
Atlanta, GA 30310-	Occupation		. = , 000
Receipt For: Primary X General	222 1747		
Other (specify):	Aggregate Year-to-Date >\$	4-1-21-20-20-20-20-20-20-20-20-20-20-20-20-20-	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of 8
Vincent R. Brown		307, 700 (Receipt this P
3455 Harvey Ave.		-7/9/88	\$100.0
Cincinnati, OH 45229	Occupation		
Receipt For: Primary X General Other (specify):	Aggregate Year-to-Date >\$		
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month,	Amount of t
Rev. Grainger Browning, Jr.		day, year)	Amount of E Receipt this P
Rev. John Browning		7/10/88	\$300.04
7808 Allentown Rd. Ft. Washington, MD 20744	Occupation	//10/88	\$300.00
Receipt For: Primary X General	Preacher		
Other (specify):		300	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month,	Amount of E
James C. Calaway		day, year)	Receipt this P
1220 Americana Bldg. 811 Dallas St.	1	7/21/88	\$1,000.
Houston, TX 77002	Occupation		
Receipt For Primary X General			
Other (specify):		1,000	
G. Full Name, Mailing Address and ZIP Code Joan B. Campbell	Name of Employer	Date (month, day, year)	Amount of Ea
475 Riverside Drive		7/15/88	\$500.00
New York, NY 10115			4300.00
Receipt For: Primary X General	Occupation		
Other (specify):	Aggregate Year-to-Date \$	56c	
TAL of Receipts This Page (optional)			

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ME OF COMMITTEE (in Full) Keep Hope Alive Political Action Committee C00229286 A. Full Name, Mailing Address and ZIP Code Name of Employer Date (month. Amount of Each - Ambrose Carrilloday, year) Receipt this Period Estella Carrillo 7/9/88 \$200.00 19100 Forst Home Rd. Plymouth, CA 95669 Occupation X General Receipt For: Primary Other (specify): Aggregate Year-to-Date >\$ 200 B. Full Name, Mailing Address and ZIP Code Name of Employer Date (month, Amount of Each Fannie M. Clayton or day, year) Receipt this Period William Beatty, Jr. or 7/10/88 \$200.00 Mary E. Coleman 519, E. Mohawk Blvd., Tulsa, OK Receipt For: X General 74106 Primery Other (specify): Aggregate Year-to-Date >\$ 200 C. Full Name, Mailing Address and ZIP Code Name of Employer Date (month, Amount of Each Receipt this Period day, year) Wayne K. Curry 11400 Earlston Drive 7/22/88 \$1,000.00 Mitchellville, MD 20716 Occupation Receipt For: Primary X General Other (specify): Aggregate Year-to-Date > \$ LCCC D. Full Name, Mailing Address and ZIP Code Name of Employer Date Imonth. Amount of Each Daniel Dennis day, year) Receipt this Period Mary S. Donnis 7/10/88 \$1,000.00 9 Huron Ave. Danvers, MA 01923 Occupation X General Receipt For Primary Cther (specify) Aggregate Year to Date >\$ 1,000 E. Full Name, Mailing Address and ZIP Code Name of Employer Date (month Amount of Each dav. vear) Receipt this Period Jacoby Dickens 7/13/88 \$5,000.00 Occupation X General Receipt For Primary Other (specify) Aggregate Year-to-Date > S S.LLT F. Full Name, Mailing Address and ZIP Code Name of Employer Date (month Amount of Each John N. Ford day, year) Receipt this Period P.O. Box 9443 7/21/88 \$200.00 Memphis, TN 38109 Occupation X General Receipt For Primary Other (specify) Aggregate Year to Date > \$ 200 G. Full Name, Mailing Address and ZIP Code Date (month, Name of Employer Amount of Each day, year) Brenda Gaines Receipt this Period 2626 N. Lakeview 7/13/88 \$500.00 Chicago, IL. 60614 Occupation X General Receipt For Primary Other (specify) Aggregate Year-to-Date > \$ \$66 SUBTOTAL of Receipts This Page (optional) 3 160 55 000032 TOTAL This Period (last page this line number only).



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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.

ME OF COMMITTEE (in Full)

A. Full Name, Mailing Address and ZIP Code - Dr. Howard S. Gloyd - Janet D. Gloyd	Name of Employer	Date (month, day, year)	Amount of Ea Receipt this Per
Shannan L. Gloyd- 555 Norlega St., San Francisco	- CARccupation	777700	33,000
Receipt For: Primary X General 9			
Other (specify):	Aggregate Year-to-Date >5.5	AAA.	
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Eac Receipt this Per
Rev. 2.L. Grady 2490 Liverpool Drive Charleston, SC 29407	36.4	7/16/88	\$1,000.
	Occupation		
Receipt For: Primary X General Other (specify):	Preacher Aggregate Year-to-Date >\$ (
			The same of the sa
C. Full Name, Mailing Address and ZIP Code Edna L. Green Earnest A. Green	Name of Employer	Date (month, day, year)	Amount of Eac Fieceipt this Per
5198-27th Street, N.W.		7/21/88	\$2,000.
Washington, D.C. 20008 Receipt For: Primary X General	Occupation		
Other (specify):	Aggregate Year-to-Date >\$ 2	Lecc	
D. Full Name, Mailing Address and ZIP Code Calvin M. Grimes, Jr.	Name of Employer	Date (month, day, year)	Amount of Eac Receipt this Per
165 Norfolk St. Boston, MA 02124-3396		7/21/88	\$5,000.
	Occupation		
Receipt For Primary X General Cther (specify):	Aggregate Year-to-Date >\$ \$	1,000	
E. Full Name, Mailing Address and ZIP Code Elliott S. Hall	Name of Employer	Date (month, day, year)	Amount of Ea Receipt this Per
Shirley R. Hall	!	7/21/88	\$1,000.
2770 Unicorn Lane, N.W. Washington, D.C. 20015	Occupation		
Receipt For Primary X General	Aggregate Year-to-Date >\$ 1	112	
F. Full Name, Mailing Address and ZIP Code	Name of Employer		A.
Dr. A. Lee Henderson	realite of Employer	Date (month, day, year)	Amount of Ea Receipt this Per
500 Eighth Ave. S. Nashville, TN 37203		7/10/88	\$1,000.
	Occupation		
Receipt For: Other (specify): Primary X General	Aggregate Year-to-Date >\$	000	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month,	Amount of Fac
C. Garnett Henning		day, year)	Receipt this Per
733 Old Bonhomme Rd.		7/10/88	\$1,000.
St. Louis, MO 63132	Occupation		+ - , 000.
Receipt For: Primary X General	Aggregate Year-to-Date > \$	CC2	
	31 -33 -32-10 - 60- 10-0016 3 1		



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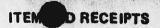
4E OF COMMITTEE (in Full)

A. Full Name, Meiling Address and ZIP Code Hazel Hicks 6510 W. Mercer Way Mercer Island, WA 98040	Name of Employer	Date (month, day, year) 7/21/88	Amount of Each Ruceipt this Period
Receipt For: Primary X General	Occupation		
Other (specify):	Aggregate Year-to-Date >\$	1,000	
B. Full Name, Mailing Address and ZIP Code Chester A. Higgins, Jr.	Name of Employer	Date (month, day, year) 7/10/88	Amount of Each Receipt this Perio
n lylo	Occupation		
Receipt For: Primary X General Other (specify):	Aggregate Year-to-Date >\$	500	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month,	Amount of Each
Emogene W. Holt 604 Bessemer Ave.	Walle of Employer	day, year)	Receipt this Perio
Bessemer, AL 35020		7/22/88	\$1,000.00
	Occupation		
Receipt For: Primary X General Other (specify):	Aggregate Year-to-Date >\$	1000	
	Name of Employer	Date (month,	A=====================================
D. Full Name, Mailing Address and ZIP Code Wirginia B. Hunter David Henry Hunter	Name of Employer	day, year)	Amount of Each Receipt this Perio
1013 Fordham Road		7/12/88	\$1,000.0
Neptune, NJ 07753	Occupation		
Receipt For Primary X General Other (specify):	Aggregate Year-to-Date >\$	toes	
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month,	Amount of Each
Bishop F.C. James	Maine of Employer	day, year)	Receipt this Perio
Hamville Estates		- (2.0.40.0	
2421 Lang Rd.		7/10/88	\$1,000.0
Columbia, SC	Occupation		
Receipt For: Primary X General Other (specify):	Aggregate Year-to-Date > \$	1000	
		1,000	
F. Full Name, Mailing Address and ZIP Code Leon N. or Sandra K. Jamison P.O. Box 7664	Name of Employer	Date (month, day, year)	Amount of Eacl Receipt this Perio
Pine Bluff, AR 71611		7/10/88	\$250.00
	Occupation		
Receipt For Primary X General		10	
		₹33	
G. Full Name, Mailing Address and ZIP Code Theodore A. Jones	Name of Employer	Date (month, day, year)	Amount of Eacl Receipt this Peri
471 E. 31st Street Chicago, IL 60616		7/14/88	\$500.00
Chicago, in ovoit	Occupation		
Receipt For: Primary X General			
Othe 'mecify)	Aggregate Year-to-Date > \$	Sta	
TAL of Receipts This Page (optional)			4,250.60

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A. Full Name, Mailing Address and ZIP Code Donald H. Jordan, Sr. 444 Whitestone Ct. Cincinnati, OH 45231	Name of Employer	Date (month, day, year) 7/10/88	Amount of Eac Receipt this Peri
Receipt For: Primary X General	Occupation		
Other (specify):	Aggregate Year-to-Date > \$ 1.601		
8. Full Name, Mailing Address and ZIP Code John H. Jordan, C.P.A. 2030 Peachtree Rd., N.W. No.5-B Atlanta, GA 30309	Name of Employer	Date (month, day, year) 7/10/88	Amount of Eac Receipt this Peri \$250.00
	Occupation	3.00	
Receipt For: Primary X General	C.P.A.		
Other (specify):	Aggregate Year-to-Date >\$ 250		
C. Full Name, Mailing Address and ZIP Code Mr. Jonnie T. Keith or Mrs. Sherry P. Keith 4970 Dublin Dr., S.W.	Name of Employer	Date (month, day, year) 7/26/88	Amount of Eac Receipt this Per
Atlanta, GA 30331 Receipt For: Primary X General	Occupation		
Other (specify):	Aggregate Year-to-Date >\$ 1,600		
D. Full Name, Mailing Address and ZIP Code Glenn O. or Arveda K. Lewis 6328 Banbury Dr. Fort Worth, TX 76119	Name of Employer	Date (month, day, year)	Amount of Eac Receipt this Peri
Receipt For. Primary X General	Occupation	-	
Other (specify):	Aggregate Year-to-Date >\$ 250		
E. Full Name, Mailing Address and ZIP Code Booker T. Lister	Name of Employer	Date (month, day, year)	Amount of Eac Receipt this Peri
300 S. Freeway Fort Worth, TX 76104		7/10/88	\$200.00
Tore worth, Ta 70104	Occupation	┥	
Receipt For: Primary X General			
Other (specify):	Aggregate Year-to-Date > \$ 200		
F. Full Name, Mailing Address and ZIP Code Charles N. Mason, Jr.	Name of Employer	Date (month, day, year)	Amount of Eac Receipt this Per
1459 Rexamus Read	retired	7/22/88	\$1,000.0
Wishington, D.C. 20012	Occupation		
Receipt For: Primary X General Other (specify):	attorney	1	
	Aggregate Year-to-Date S Ltcc	1 5	
G. Full Name, Mailing Address and ZIP Code Howland M. Mason	Name of Employer	Date (month, day, year)	Amount of Eac Receipt this Peri
P.O. Box 108 Washington, D.C. 20044		7/22/88	\$1,000.0
Receipt For: Primary X General	Occupation		
Other (specify):	Aggregate Year to Date > \$ 1.660		

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FOR LINE NUMBER

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IE OF COMMITTEE (in Full) Keep Hope Alive Political Action Committee C00229286 A. Full Name, Mailing Address and ZIP Code Name of Employer Date (month, Amount of Each day, year) Receipt this Period Carl Maxey Attorney at Law 7/26/88 \$500.00 West 1303 Broadway Spokane, Washington 99201 Occupation Receipt For: Primary Attorney Other (specify): Aggregate Year-to-Date >\$ 500 B. Full Name, Mailing Address and ZIP Code Amount of Each Name of Employer Date (month. day, year) Receipt this Period Martine Maxey Bevan J. Maxey 7/26/88 \$500.00 E 16 29th Spokane, Washington 99203 Occupation Receipt For: Primary X General >\$ 500 Aggregate Year-to-Date C. Full Name, Mailing Address and ZIP Code Name of Employer Date (month, Amount of Each day, year) Receipt this Period Enola D. Maxwell 1559 Jerrold Ave. 7/9/88 \$250.00 San Francisco, CA 94124 Occupation Receipt For: X General Primary Other (specify): Aggregate Year-to-Date > \$ 120 D. Full Name, Mailing Address and ZIP Code Name of Employer Date (month, Amount of Each day, year) Receipt this Period Dr. Joseph McKinney 4633 Blagden Ave., N.W. Washington, D.C. 20011 7/7/88 \$1,000.00 Occupation X General Receipt For Primary Cther (specify) Aggregate Year-to-Date >\$ 1.600 E. Full Name, Mailing Address and ZIP Code Date (month Name of Employer Amount of Each day, year) Receipt this Period Ruby B. McZier 1420 N Street, N.W. Suite 10 7/21/88 \$5,000.00 Washington, D.C. 20005-2843 Occupation X General Receipt For Primary Other (specify) Aggregate Year-to-Date > \$ 5.000 F. Full Name, Mailing Address and ZIP Code Name of Employer Date (month, Amount of Each Receipt this Period day, year) Bishop Donald G. Ming Edith W. Ming-7/10/88 \$1,000.00 7100 Grey Oak Dr. New Orleans, LA 70126 Occupation X General Receipt For Primary Other (specify) Aggregate Year-to-Date >\$ 1.662 G. Full Name, Mailing Address and ZIP Code Name of Employer Date imonth, Amount of Each day, year) Receipt this Period Lucy Montgomery 175 E. Delaware Pl. 7/25/88 \$500.00 Chicago, IL 60603 Occupation Primary ¥ General Receipt For Other (specify) Aggregate Year-to-Date 00.00 SUBTOTAL of Receipts This Page (optional) 1 750.00

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WE OF COMMITTEE (in Full)

A. Full Name, Mailing Address and ZIP Code Lucy Montgomery 175 E. Delaware Pl. Chicago, IL 60603		dey, year)	Amount of Eac Receipt this Peri
	Occupation	7/29/88	\$500.00
Receipt For: Primary X General	- Occupation		
Other (specify):	Aggregate Year-to-Date > \$	1,000.00	
3. Full Name, Mailing Address and ZIP Code Eric Moore 4800 S. Chicago Beach Dr.	Name of Employer	Date (month, day, year)	Amount of Eac Receipt this Peri
Chicago, IL 60615		7/12/88	\$1,000.
Receipt For: Primary X General	Occupation		3.
Other (specify):	Aggregate Year-to-Date >\$	1.000	The second
C. Full Name, Mailing Address and ZIP Code Mr. Charlie F. Morris, Sr.	Name of Employer	Date (month, day, year)	Amount of Eac Receipt this Per
-or Mrs. Alma Morris 981 Alaska Street		7/8/88	\$250.00
Memphis, TN 38107	Occupation		
Receipt For: Primary X General Other (specify):	Aggregate Year-to-Date >\$	350	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month,	Amount of Ea
Bishop Henry W. Murph 8939 Sepulveda Blvd. Suite 240	0	day, year \	Receipt this Per
Los Angeles, CA 90045	Occupation	7/ /88	\$500.00
Receipt For Primary X General	Preacher		
Cther (specify):	Aggregate Year-to-Date >\$	500.00	
E. Full Name, Mailing Address and ZIP Code Bishop Henry W. Murph	Name of Employer	Date (month, day, year)	Amount of Ea Receipt this Per
8939 Sepulveda Blvd. Suite 240 Los Angeles, CA 90045)	7/10/88	\$500.00
	Occupation		
Receipt For Primary X General	Preacher	1 000 00	
		1,000.00	
F. Full Name, Mailing Address and ZIP Code Hazel F. Obey D. O. Boss, 6005	Name of Employer	Date (month, day, year)	Amount of Ea Receipt this Per
P.O. Box 6095 Austin, Texas 78762		7/10/88	\$250.00
Receipt For Primary X General	Occupation		
Other (specify)	Aggregate Year to Date >\$	325	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Eac Receipt this Per
Darlene L. Paris	1	7/13/88	\$1,000.0
	Occupation		
Receipt For Primary X General Other (specify)	Aggregate Year to Date >\$	1,00 2	
'AL of Receipts This Page (optional)		',,,,,	6,000.00

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FOR LINE NUMBER

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ME OF COMMITTEE (In Full

A. Full Name, Mailing Address and ZIP Code Mamon Powers 2077 Harrison Street Gary, Indiana 46407	Name of Employer	Date (month, day, year) 7/ /88	Amount of E Receipt this P \$1,000	
Receipt For: Primary General	Occupation			
Other (specify):	Aggregata Year-to-Date > \$	1,000		
8. Full Name, Mailing Address and ZIP Code John Wiley Price 406 E. 5th St. Dallacy TX 75203	Name of Employer	Date (month, day, year)	Amount of the Receipt this P	
Receipt For: Primary X General	Occupation	4-1-1		
Other (specify):	Aggregate Year-to-Date >\$			
C. Full Name, Mailing Address and ZIP Code Bishop Frank M. Reid, Jr.	Name of Employer	Date (month, day, year)	Amount of E Receipt this P	
or Irene B. Reid 1403 Miami Cir.		7/10/88	\$1,000	
Birmingham, AL 35214 Receipt For: Primary y General	Occupation			
Receipt For: Primary X General Other (specify):	Preacher Aggregate Year-to-Date > \$1	1,000.00		
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month,	Amount of E	
Bishop Frank M. Reid, Jr. Or Irene B. Reid 1403 Miami Cir.		7/10/88	Receipt this P	
Birmingham, AL 35214	Occupation			
Receipt For: Primary General Other (specify):	Preacher Aggregate Year-to-Date >\$	2 202 20		
		2.000.00		
E. Full Name, Mailing Address and ZIP Code Norma Sandy P.O. Box 169 St. Albans, NY 11412	Name of Employer	Date (month, day, year)	Amount of E Receipt this P	
·	Occupation			
Receipt For Primary X General Other (specify):	Aggregate Year-to-Date > S	260		
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month,	Amount of E	
Linda J. Sisk 3550 Carter Dr., No. 136		day, year)	Receipt this Pe	
So. San Francisco, CA 94080		7/9/88	\$500.00	
Receipt For Primary X General	Occupation			
Other (specify):	Aggregate Year-to-Date >\$	500		
G. Full Name, Mailing Address and ZIP Code Margaret Smith	Name of Employer	Date (month, day, year)	Amount of Ea	
4949 S. King Dr.		7/13/88	\$500.00	
Chicago, IL 60615	Occupation			
Receipt For Primary X General Other (specify):	_ egate Year-to-Date >\$	900		
1 1000 000000		300	4, 200,60	

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PAGE OF 19
FOR LINE NUMBER

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A. Full Name, Mailing Address and ZIP Code Osborne E. Smith	Name of Employer	Date (month, day, year)	Amount o
Denise Smith 9914 Litzsinger Road		7/11/88	\$1,000
St. Louis, MO 63124 Receipt For: Primary X General	Occupation	4.0	9.3
Other (specify):	Aggregate Year-to-Date >\$.000	
8. Full Name, Mailing Address and ZIP Code A.M. Stewart	Name of Employer	Date (month, day, year)	Amount of Receipt this
3399 Fannin Dr. Lithonia, GA 30058		8/4/88	\$200.0
	Occupation		
Receipt For: Primary X General Other (specify):	Aggregate Year-to-Date >\$ 2	200	
C. Full Name, Mailing Address and ZIP Code Fred Stuart, Jr.	Name of Employer	Date (month, day, year)	Amount of Receipt this
-Helen B. Stuart 1234 W. 80th Street		7/10/88	\$500.0
Los Angeles, CA 90044	Occupation	//10/00	4300.0
Receipt For: Primary X General Other (specify):	Aggregate Year-to-Date >\$ 5		
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month,	Amount of
Charles A. Tribbett III Lisa Brown Tribbett		day, year)	Receipt this
741 Gordon Ter.		7/12/88	\$200.0
Chicago, IL 60613 Receipt For Primary X General	Occupation		
Receipt For Primary X General Other (specify):	Aggregate Year-to-Date >\$ 2	6C	
E. Full Name, Mailing Address and ZIP Code Deborah Ann Turner, M.D.	Name of Employer	Date (month, day, year)	Amount of Receipt this
1244 Guildford Crt. Iowa City, Iowa 52240		7/13/88	\$1,000
	Occupation		
Receipt For Primary X General	Doctor Aggregate Year-to-Date > \$ 1,	000	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month,	Amount of
Willa M. Vernon 25200 Carlos Bee Blvd. No. 509		day, year) 7/8/88	Receipt this
Hayward, CA 94542	Occupation		
Receipt For Primary X General			
Other (specify): G. Full Name, Mailing Address and ZIP Code	Aggregate Year-to-Date > \$ \$	Date (month,	A
Mcobee W. Waters 10125 - 4 Mile Rd.	realite of Employer	day, year)	Amount of Receipt this
Franksville, Wis. 53126	Occupation	7/7/88	\$250.0
Receipt For: Primary X General	Occupation		
X Senteral			

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ME OF COMMITTEE (in Full) Keep Hope Alive Political Action Committee C00229286 A. Full Name, Mailing Address and ZIP Code Name of Employer Dete (month, Amount of Each day, year) Receipt this Period Royce West or Carol R. West 1014 Qual Run 7/10/88 \$500.00 Duncanville, TX 75115 Occupation X General Receipt For: Primary Other (specify): Aggregate Year-to-Date >\$ 500 B. Full Name, Mailing Address and ZIP Code Name of Employer Date (month, Amount of Each day, year) Receipt this Period Quincy J. Wilkins or Aundrey C. Wilkins 8/17/88 \$500.00 2580 Kearney Street Occupation Denver, CO 80207 Beauty Consultants Receipt For y General Aggregate Year-to-Date >\$ 500 Other (specify): C. Full Name, Mailing Address and ZIP Code Name of Employer Date (month, Amount of Each day, year) Feceipt this Period Bobbye F. Wilson Bennie Wilson 7/11/88 \$250.00 5806 Southlea St. Occupation Houston, Tx 77033 X General Receipt For: Other (specify): Aggregate Year-to-Date >\$ 450 D. Full Name, Mailing Address and ZIP Code Name of Employer Date (month. Amount of Each day, year) Receipt this Period Paterson Wiman 343 Keller St. 7/22/88 \$250.00 Petaluma, CA 94952 Occupation X General Receipt For Primary Other (specify) Aggregate Year-to-Date > s 200 E. Full Name, Mailing Address and ZIP Code Name of Employer Date (month.) Amount of Each day, year) Receipt this Period Occupation Receipt For Primary General Other (specify) Aggregate Year-to-Date F. Full Name, Mailing Address and ZIP Code Name of Employer Date (month, Amount of Each day, year) Receipt this Period Occupation Receipt For Primary General Other (specify) Aggregate Year-to-Date Name of Employer G. Full Name, Mailing Address and ZIP Code Date (month, Amount of Each day, year) Receipt this Period Occupation Receipt For Primary General Other (specify) Aggregate Year-to-Date SUBTOTAL of Receipts This Page (optional) . . . 1,500.00 TOTAL This Period (last page this line number only)

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SCHEDULE A

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(Contributions value legality is undear); (foreign banks)

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FOR LINE NUMBER

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Keep Hope Alive Political Action Committee	C00229286		
A. Full Name, Mailing Address and ZIP Code Ruth E. Davis (by 1 20 travellen' checks; he farther	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
identifying information available)	Occupation	(/10/88	100,00
Receipt For: Primary J General Other (specify):	Aggregate Year-to-Date >\$ ICC		4
B. Full Name, Mailing Address and ZIP Code E. Labette Bray (?) (by #50 travellers' checks; he further	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
dentinging in similar assilable)	Occupation		213,00
Receipt For: Primary J General Other (specify):	Aggregate Year-to-Date >\$ 250		
C. Full Name, Mailing Address and ZIP Code Ann Whate (by \$20 travellers' cheeks; so further	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: Primery / General	Occupation		40.00
Other (specify):	Aggregate Year-to-Date >\$ 40		
D. Full Name, Mailing Address and ZIP Code Rewrite Prute, Ph.D. **UNDP**	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
P.G. Box 274; Manrevia, Libertia, host Africa Receipt For: Primary y General	Occupation	7/10/88	52.00
Cther (specify):	Aggregate Year-to-Date >\$ 50		
E. Full Name, Mailing Address end ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For Primary General	Occupation	-	
Receipt For: Primary General Other (specify).	Aggregate Year-to-Date >\$		
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For Primary General	Occupation		
Other (specify):	Aggregate Year to Date >\$		
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: Primary General	Occupation	1	
Other (specify)	Aggregate Year-to-Date \$		
TAL of Receipts This Page (optional)			410.00
This Period (last page this line number only)		041	71, 40,00

SCHEDULE A

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ITEM PRECEIPTS

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F	OR LIN	E NUMBER	1

(Contributions from Political Committees)

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.

Friends of Jesse Jackson	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Washington, D.C.	Occupation	7/13/88	\$5,000.00
Receipt For: Primary X General Other (specify):	Aggregate Year-to-Date > \$	5400	
B. Full Name, Mailing Address and ZIP Code			A
Congressman Major Owens In '88 Committee P.O. Box 2265	Name of Employer Date (month, day, year) 8/29/88		Amount of Each Receipt this Period \$ 100.00
Brooklyn, NY 11202-2265	Occupation		1.00
Receipt For: Primary X General			5337 4
Other (specify):	Aggregate Year-to-Date >\$	100	
C. Full Name, Mailing Address and ZIP Code Mid Brooklyn Political Assn.	Name of Employer	Date (month, day, year) 9/15/88	Amount of Each Receipt this Period \$ 100.00
	<u> </u>	7/13/00	100.00
Service Service Service Vice and	Occupation		
Receipt For: Primary X General Other (specify):	Aggregate Year-to-Date >\$	ICC	ł
D. Full Name, Mailing Address and ZIP Code Committee To Elect Rev. A. R. Polk (Sec./Treas. of Extension)	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Perio
		7/10/88	\$ 500.00
505 Beechwood St. River Rouge, MI 48218	Occupation .		
Receipt For. Primary X General Cther (specify):			-
		378	
E. Full Name, Mailing Address and ZIP Code John Wiley Price Campaign 406 E. 5th St. 943-8114	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Perio
D-11 MY 75202		7/9/88	\$ 250.00
Dallas, TX 75203			ł
	Occupation		
		257	
Receipt For: Primary X General Other (specify):	Aggregate Year-to-Date \$	258 Date (month.	Amount of Each
Receipt For: Primary X General Other (specify): F. Full Name, Mailing Address and ZIP Code		Date (month, day, year)	
Receipt For: Other (specify): F. Full Name, Mailing Address and ZIP Code Eldig Remix Schren	Aggregate Year-to-Date \$	Date (month,	
Receipt For: Other (specify): F. Full Name, Mailing Address and ZIP Code Eddic Bernix Schrein 63CS Edder Grove Dr	Aggregate Year-to-Date \$	Date (month, day, year)	Receipt this Perio
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Use category of the Detailed Summery Page

PAGE OF 2

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.

ME OF COMMITTEE (in Full)			
Keep Hope Alive Tolitical Action Commit	be 200 229.286		
A. Full Name, Meiling Address and 21P Gode Shery I losser & Associates 233 E. Waster Dr., # 909 Chicago, Illinois 60661	Purpose of Disbursement divect mail Disbursement for: Primary J General Other (specify)	Dete (month day, year)	Amount of Each Disbursement This Period
B. Full Name, Meiling Address and ZIP Code Sheed's & Associates 3449 hilliamsburg, Dr. hialderf, Maryland .26661	Purpose of Disbursement Livet Mai Disbursement for: Primery General Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code Mal Warnick & Associates (Changing America, 2550 945 St., Suite # 1000 Inc.) Revelby, California 94710	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code Independence Bank of Chicago 7936 Senth Cattage Green	Purpose of Disbursement Control Disbursement for: Primary General Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Perio
Chicago Illinois 66619 E. Full Name, Mailing Address and ZIP Code 6. S. Postinuster Liushington, D.C.	Purpose of Disbursement Justiness reply Mac Disbursement for: Primary / General Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code Design Sturie 927 F. St., N. w. Washington, D.C	Purpose of Disbursement RCK design Disbursement for: Primary V General Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Perio
G. Full Name, Mailing Address and ZIP Code Robert Mchilly Bob Mchilly 1787 Columbia Roca, N. S. Lirshington, D.C. 20000	Purpose of Disbursement graphics Disbursement for: Primary General Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
M. Full Name, Mailing Address and ZIP Code Frank Clemente 1869 Mintured Pl., N. w. Lishington, P. J. 20007	Purpose of Disbursement Lici k Circ book Disbursement for: Primary v General Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
Guk Cross Printing Co.	Purpose of Disbursement Printing Disbursement for: Primary General Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
TOTAL of Disbursements This Page (optional)			16,941.60

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ITEMIZED ISBURSEMENTS

Use separate schedule(s) | PAGE OF | 2 | 2 | 2 | FOR LINE NUMBER

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.

Keep Hope Alive Political Are I. Full Name, Mailing Address and ZIP Gods Prince Lithograph Co. 8966 Lie Mighinay	Purpose of Disbursement poster lithe work	Data (month, day, year)	Amount of Each Disbursement This Period
8900 lie Highway Fairfax, Virginia 22031	Disbursement for: Primery V General Other (specify)	8/23/88	6,458.10
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E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
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F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
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Reference: Colding to

Dear Mr. McGwelans

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-The identification of week puntrillabor, in the person's coordation and links of implayer, provided if the person this tembritanted in \$200 in the appropriate for ing the columns when exact folders a contributor's coordation and emplopyer.

Note: If your committee has made at least the offert per solicitation, either by a written request or by an oral request documented in writing to obtain this information from the contributor, your committee may have exercised best efforts. Under 11 CFR 204.7(b), such effort shall consist of a clear request for the information (i.e., name, mailing address, de name of employer) which request into contributor that the reporting of such information is required by lay. If you believe that your dissistance satisfies the "best efforts" provision, you should provide a copy of your solicitation or an emplemention to obtain contribution of the method(s) used Clarification regarding "best efforts" information. should be disclosed during each two year election cycle beginning with the first report filed in the monelection year. 11 CFR 104.3(a)(4)(i)

discloses limited -Your report payments administrative expenses. Administrative expenses are payments made for the purpose of operating a political

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organization, and organization will be religiously with the second of th

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Any goods or services introduced to your ownsiting by a person, except values in 19-14. Here, a person state of consideration in Time Constitution from that person, and would be published to the distribution requirements of 3 %.4.63 \$254(6-(3)) and 11 CFR 154,13, and the limitations and possible constitute of 2 %.6.6. \$5441a and 441b.

Please provide clarification remarking educates ive expenses incorred by year femilities and/or many year report to disclose such temperates according to the referenced provisions of the Not and Constation regulations. Clarification reporting administrative expenses should be displosed define such two with the first super files in the non-election year.

-Schedule A of your report (pertinent portion(s) attached) discloses a contribution(s) from an organization(s) which is not a political committee registered with the Commission. Under 11 GFR 182.5(b), organizations which are not political committees under the Act must either: 1) establish a separate account which contains only those funds permitted under the Act, or 2) demonstrate through a reasonable accounting method that the organization has received sufficient funds subject to the limitations and prohibitions in order to make the contribution.

If your committee does not finance non-federal activity, the receipt of the referenced contribution(s) may violate the limitations and prohibitions of the Act. (2 U.S.C. \$\$441a(f) and 441b) If your committee engages in both federal and non-federal activity, either through a separate non-federal account, or one account that finances activity in connection with both

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Plane inform the Commission labelistely in writing and provide a photosomy of year whook for the refuse or remarkable for the refuse of transfer-out should be discussed by a happorting binequie b for Line 26 or 20 of the regist dovering the period during which they are made.

If the contribution(s) is question was incomplehely as importantly displosed, you whould amend your original report with the claritying information.

Although the Commission may take further legal states concerning the acceptance of prohibited contributions, prompt action by your committee in refunding be transferring-out the amounts will be taken into consideration.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. By local number is (202) 376-2480.

Sincerely,

Anthony Raymond

Senior Reports Analyst Reports Analysis Division



FEDERAL ELECTION COMMISSION 19-1

December 30, 1908

Cirilo McSween, Treasurer Keep Hope Alive Political Action Committee 1074 Thomas Jefferson Street Washington, DC 20007

Identification Number: C00229286

Reference: October Quarterly Report (7/1/88-9/30/88)

Dear Mr. McSween:

On December 7, 1988 you were notified that a review of the above-referenced report(s) raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act.

Your December 15, 1988 response is incomplete because you have not provided all the requested information. For this response to be considered adequate, the following information is still required.

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

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

Any goods or services provided to your committee by a person, except volunteer activity (i.e., a person's time), would be considered an in-kind contribution from that person, and would be subject to the disclosure

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requirements of 2 U.S.C. \$434(b)(3) and 11 CFR 104.13, and the limitations and prohibitions of 2 U.S.C. \$5441a and 441b.

Please provide clarification regarding administrative expenses incurred by your committee and/or amend your report to disclose such expenses according to the referenced provisions of the Act and Commission regulations. Clarification regarding administrative expenses should be disclosed during each two wair election cycle beginning with the first report filed in the hon-election year.

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

If your committee does not finance non-federal activity, the receipt of the referenced contribution(s) may violate the limitations and prohibitions of the Act. (2 U.S.C. \$5441a(f) and 441b) If your committee engages in both federal and non-federal activity, wither through a separate non-federal account, or one account that finances activity in connection with both federal and non-federal elections, your committee may be in violation of 11 CFR 102.5(a).

Please clarify whether the contribution(s) received from the referenced organisation(s) is permissible. To the extent that your committee has received funds which are not permissible, the Commission recommends that you refund the impermissible amount(s) to the donor(s) in accordance with 11 CFR 103.3(b). Alternatively, if you choose to transfer the funds to an account not used to influence federal elections, the Commission advises that you inform the contributor in writing and provide the contributor with the option of receiving a refund. You may wish to seek a written authorization (either before or after the transfer-out) from the donor for any transfer-out to protect the donor's interests.

KERP BODE ALIVE POLITICAL ACTION CONSISTEE PAGE 3

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Please inform the Commission immediately in writing and provide a photocopy of your check for the raised as transfer-out. Refunds and transfers-out should be discussed on a supporting schedule a for the 26 or - of the report covering the period during which they are made.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information.

Although the Commission may take further legal steps concerning the acceptance of prohibited contributions, prompt action by your committee in refunding estransferring-out the amounts will be taken into consideration.

If this information is not received by the Commission within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

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

Sincerely,

John D. Gibson

Assistant Staff Director Reports Analysis Division

PEDERAL ENGINEE DIVISSION

Keep Nope Alive Political 99 JAN 30 AM 10:00
Action Committee
733 15th St., M.W., Room #700
Mashington, D.C. 20005
January 13, 1989

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

Dear Mr. Gibson:

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In response to your letter of December 30, 1988, to the Keep Hope Alive Political Action Committee, I would like to report the following:

--You noted that during the period July 1, 1988, through September 30, 1988, the PAC had very low expenses for administrative functions. That is correct. As it happens, the Keep Hope Alive PAC raised its early money at gatherings during the Atlanta Convention, at no cost; and, from one direct mail effort after the convention, for which the consultant expenses were detailed in the disbursement section of the report.

The PAC had no staff until after October 15, 1988. It had no office space until December 1, 1988 (although friends of the PAC did agree to collect mail for the PAC at our old Thomas Jefferson St. address). The PAC had no phone until December 21, 1988. Thus, we had almost no administrative expenses during not only the third quarter reporting period, but also for the post-election reporting period.

We now have an executive director; a telephone (202) 737-4673; and a new office, at the address above. These

costs will be reported in our next report, and in all subsequent reports.

--The other question you had involved a contribution the PAC received from a committee which was not registered with the FEC. Since that time, this \$5,000 contribution, along with another \$1,975 in contributions which we could not quickly verify as qualified for our federal account, have been transferred to our non-federal account. (The deposit/transfer slip is attached for verification.) -> \$\frac{1}{2} \limits_{1} \limits_{2} \limit

I trust these responses will answer your questions. If you have any further questions, please contact me through the PAC office in Washington--Steve Cobble, at 737-4673. Thank you.

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Cirilo A. Aceween

Secretary/Trea

Reep Hope Alive Political Action Committee 733 15th St., M.W., Room #700 Washington, D.C. 20005 January 24, 1989

Mr. Anthony D. Raymond Senior Analyst Federal Election Commission 999 E Street, N.W. Washington, D.C. 20463

Dear Mr. Raymond,

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This letter updates our donors' employer and occupation information, which was not included on our original third-quarter 1988 report. The letter that we sent to our donors, requesting this required information, is attached.

Our information is still not complete, but we feel that we have made our best effort to meet the requirements of CFR 104.3 (a) (4) (i). The new data we did receive from our donors is also attached.

Please call me if there are any questions, at (202) 737-4673.

Sincerely,

Steven B. Gobble

Steven B. Cobble Executive Director

	37 /				PEOPLAL E
K	eep Hope Alive Politic	Cal Action	Committee		January 12, 1949
7	33 15th St., N.W.; No	om #700			C00229286
	ashington, D.C. 20005				
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4,0	rt (e.g., assistant treasurer). Pull Name	Mailing Ad	Idress		Title or Position
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9. Bor	nte er Other Depositories: List all banks es or manteine funds.	or other deposituries i	n which the comm	Mos deposits funds.	helds accounts, rems ealely dep
000	Independence Bank of	Chicago		uth Cottage	Grove Avenue

NOTE: Submission of false, errondous, or incompress information may subject the person segring the Statement to the per-ANY CHANGE IN INFORMATION SHOULD BE REPORTED WITHIN 16 DAYS.

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Cirilo A. McSween

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1/12/1989

DATE

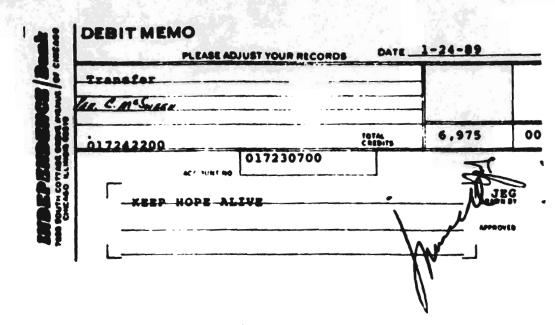
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Den Mr. Michien,

Here is our latest FEC report. Please sign and date the mext page at the bottom (marked in blue magic marker), and send to the FEC by registered or certified mail tomorrow (Tuesday, January 31, 1989). It must be sent tomorrow to be on time.

The correct address is:

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

Thanks.

Sincerely Stare Cobble

REPORT OF RECEIPTS AND DISBURGMENTS For Other Than An Authorized Committee (Summary Page)

	ADDRESS (number and street) Check if different than previous	ously reported	2. FEC IDENTIFICA	TION NUMBER
-	753 15th St., M.W.; Room # 700		00229	36
	CITY, STATE and ZIP CODE			ee qualified as a mu
	Washington, D.C. 20005		committee D	URING THIS Repo
	4. TYPE OF	REPORT		
	(a) April 15 Quarterly Report	Mon	thly Report Due On:	
	July 15 Quarterly Report			ne 20
	October 15 Quarterly Report		April 20 🔲 Aug	y 20
	January 31 Year End Report	Twe	Ifth day report preceding	
	July 31 Mid Year Report (Non-election Year Only)			(Type of Elec
	July 31 Mid Year Report (Non-election Year Only)	elec	tion on	in the State of
		Thirt	ieth day report follow	ring the General I
	Termination Report	-	in the Sta	ite of
	(b) Is this Report an Amendment? YES NO			
5 .	SUMMARY) કહેડ	COLUMN A This Period	
5. 6.		12.		
	SUMMARY Covering Period 1990 1990 1990 1990 1990 1990 1990 199	£ 12		Calendar Year
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(revised 4/87)

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Name of Committee (in full)	Report Covering the Period From: Assertion 23	To: Tarimpier 21 199
I. RECEIPTS	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date
11. CONTRIBUTIONS (other than loans) FROM:	The state of the s	De la
(a) Individuals/Persons Other Than Political Committees	一种,这种种种	The state of the s
(i) Itemized (use Schedule A)	0.00	17.765.00
(ii) Unitemized	140.00	135 031 54
(iii) Total of contributions from individuals	:46. CC	212 791 54
(b) Political Party Committees	0.00	100 00
(c) Other Political Committees (such as PACs)	C. CC	0.00
(d) TOTAL CONTRIBUTIONS (add 11(a)(iii), (b), and (c))	140.00	212 594, 74
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES		c
13. ALL LOANS RECEIVED	C	A CONTRACTOR OF THE PARTY OF TH
14. LOAN REPAYMENTS RECEIVED	C	en e
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	Lat Valuation Committee	CONTROL OF THE PARTY OF THE PARTY.
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES	C C Company	
AND OTHER POLITICAL COMMITTEES	0	2
17. OTHER RECEIPTS (Dividends Interest, etc.)	ac), 88	1:2:07
18. TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)	1 276 35	214 (57)
II. DISBURSEMENTS	A HILLAND A	
19. OPERATING EXPENDITURES	31, 354,00	Ex 140 :
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES		
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	2	``
22. INDEPENDENT EXPENDITURES (use Schedule E)		•
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (use Schedule F).	3	r
24. LOAN REPAYMENTS MADE	N	
25. LOANS MADE		
26. REFUNDS OF CONTRIBUTIONS TO:	HERON STATE	the man
(a) Individuals/Persons Other Than Political Committees		
(b) Political Party Committees		
(c) Other Political Committees (such as PACs)		
(d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c))	Ď	Č
27. OTHER DISBURSEMENTS . (Mark federal tax withlolding)	CARLONAL CONTROL OF THE STATE O	and the state of t
28. TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d)	(\$.29	
and 27)	21, X22, 23	13.512.50
III. NET CONTRIBUTIONS/OPERATING EXPENDITURES		1. 1
29. TOTAL CONTRIBUTIONS (other than loans)(from Line 11(d)).	140,00	2'2, 396. 54
30. TOTAL CONTRIBUTION REFUNDS (from Line 26(d))	C.30	0.00
AL LIET CONTRIBUTIONS ()	140, 00	212 (4) :4
31. NET CONTRIBUTIONS (other than loans)(subtract Line 30 from 29).	できたい アングルバング アンスカット とままします	A STATE OF THE PARTY OF THE PAR
31. NET CONTRIBUTIONS (other than loans)(subtract Line 30 from 29)	20,754 co	(344)

SCHEDULE A

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ITEMIZED RECEIPTS

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

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.

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Perio
Receipt For: Primary General	Occupation		lineae over
Other (specify):	Aggregate Year-to-Date > \$, x00,00
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Perio
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	Occupation		

SCHEDULE B

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ITEMIZED DISBURSEMENTS

Use separate schedule(s) for each category of the	PAGE	OF .
Detailed Summary Page	FOR LINI	NUMBER

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.

A. Full Name, Mailing Address and ZIP Code Executive Lines, Woodward Building	Purpose of Disbursement Rent + Security Deposit	Date (month day, year)	Amount of Each Disbursement This Period
737 57 34. Million Swife 4 700	Disbursement for: Primary General Other (specify)	11 30/38	8 · 200.00
3. Full Name, Mailing Address and ZIP Code Executive Suites, Diccolorard Building	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Perio
753 (5th St. Niver; Suite # 700	Disbursement for:	12/24/38	\$ 500.00
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
27 2 July 300 2901	Disbursement for: Primary General Other (specify)	2/5/33	5 - (3), 30
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Per
737 52 Sty N. W. J. Reem #700	Disbursement for:	12 5/18	\$ 6,000 pt
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Per
RETURN DAMEN FAME Common Street CODE TO	Disbursement for: Primary General Other (specify)	12 31 43	\$ 7,00
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Per
Mark Martierd Place for an	Disbursement for: Primary General Other (specify)	233	5:-:-
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Per
DA PORTONIA ROBERTON Borney Manney 33202 (2004)	Disbursement for:	13,30 44	5 3: -
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Per
30 to enstanto, sut = 300 Characo Maris 10003	Disbursement for: Primary General Other (specify)	12/24/38	\$ 1.8.00
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Plane diposed	Date (month, day, year)	Amount of Each Disbursement This Per
20 364 20109 2 umrail - Carana 23202-2009	Disbursement for: U Primary General Other (specify)	11 30/88	5 5.60
OTAL of Disbursements This Page (optional)			\$ 9 2 8 3 3

SCHEDULE B

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ITEMIZED DISBURSEMENTS

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

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

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement D. Line infercom Account	Date (month, day, year)	Amount of Each Disbursement This Peri
% Executive Souther, Weedward Blody.	Disbursement for: Primary General Other (specify)	niseles	842,50
3. Full Name, Mailing Address and ZIP Code 20005	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Perio
30 is instruction, Suite # 1215	Disbursement for:	12/20/25	8 2 44.52
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Peimbursement for travel. +	Date (month, day, year)	Amount of Each Disbursement This Period
2550 M Street 148 (1884) 200 57	Disbursement for: Primary Géneral Other (specify)	12/21 19	5 33 30
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement (final fer is related for its films of the fer is the films of the fer is t	Date (month, day, year)	Amount of Each Disbursement This Peri
Stern Labore 757 (27 32) N.W. Rom #700 1905	Disbursement for: V Primary General Other (specify)	33.10	\$ 540,00
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Per.
780 5# Ch. N.W. Rem #700	Disbursement for , Primary General Other (specify)	83.4	\$ 3 510 Co
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Per
	Disbursement for Primary General Other (specify)		
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Per
	Disbursement for: Primary General Other (specify)		
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Per
	Disbursement for: Primary General Other (specify)		
. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Per
	Disbursement for: Primary General Other (specify)		
OTAL of Disbursements This Page (optional)			5 2 765, 68

91040830737

Mr. Anthony D. Rayland Senior Analyst Pederal Elections Charles 999 E St., N.W. Washington, D.C. 1845

Dear Mr. Reymond,

Hope Alive 316 French Rose because of the state of the contract of the creations of the contract of the contra

The first trippeter of \$10 100 100 200 100 12/15/88 (the caseslied office is displayed 12/15/88 (the caseslied office) is displayed included \$2,000 which we had provided trippeter the for which we had so addresses at \$15. These states from James W. Compton for \$500, charter a triplete for \$500, and Deriene L. Parke for \$1.000 large and included in our Non-Tederal Resolute. This includes our calendar year contributions to \$12,000 large.

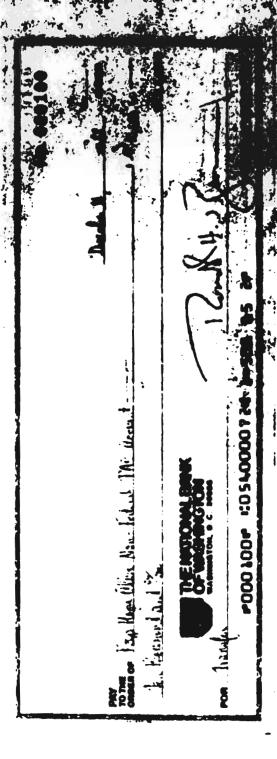
The second transfer is dit noted on this report, since it was accomplished last week. However, you have received a zerox copy of the transfer, bland you had previously requested that a \$5,000 check from "Friends of Jackson" be accounted for -- since we bould not identify the donors, we have transferred the Wohey. This \$6,975 transfer lowered our calendar year Folitical Party Committees contributions by \$6,850 to \$100. In conjunction with a \$50 addition error, it also took \$125 away from the individual unitemized contributions, lowering the total by \$75 to \$135,031.54.

Thus, our calendar year Total Contributions has dropped down to \$214,557.61. If you have any questions or comments, please give me a call at 737-4673. Thanks.

Sincerely,

Hour B. Calle

Steven B. Cobble Executive Director







FEDERAL ELECTION COMMISSION

WASHINGTON DC 3063

RQ-2

Cirilo A. McSween, Treasurer
Keep Hope Alive Political
Action Committee
1074 Thomas Jefferson Street
Washington, DC 20007

MAR 8 1989

Identification Number: C00229286

Reference: Year End Report (11/29/88-12/31/88)

Dear Mr. McSween:

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

-Although you have reduced receipts from Line 11(a)(i) and 11(b) of the Detailed Summary Page through a transfer-out to your non-federal account, you should not adjust the Column B calendar year-to-date figures. Please amend your report to disclose total receipts into your account for the calendar year. In addition, your beginning cash-on-hand figure on Line 6(b) of the Summary Page should equal the cash-on-hand at the close of your 1988 30 Day Post-General Report.

-The Commission notes your transfers to your non-federal account of possible impermissible funds. Although the Commission may take further legal steps concerning the acceptance of impermissible funds, your prompt action will be taken into consideration.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,

000066

Anthony **p.** Raymond Senior Reports Analyst Reports Analysis Division



ID #: C00229286 733 15th St., N.W. Room #700 Washington, D.C. 20005 March 27, 1989

Anthony D. Raymond Senior Reports Analyst Reports Analysis Division Federal Election Commission Washington, D.C. 20463

Dear Mr. Raymond:

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On March 8, 1989, you wrote to the Keep Hope Alive PAC requesting a written response regarding certain information from our Year End Report. I should note here that we have responded in as timely a fashion as we could, including walking our response over to the FEC personally. Unfortunately, your letter was mailed to our old address (1074 Thomas Jefferson St.) instead of our new one (733 15th St., N.W.; Room #700; Washington, D.C.; 20005), thus delaying our receipt of the letter.

(We have previously filed an amendment of our address with the FEC. If we need to do so again, please let me know.)

As you noted in your March 8th letter, we had incorrectly adjusted our calendar-year-to-date figures when we transferred certain monies from our Federal account to our Non-Federal account. Upon review, this was due to several factors, but mainly due to our assumption that monies that should have originally been placed in our Non-Federal account should not be counted as having been received and then disbursed from our Federal account. Now that you have corrected this mistaken assumption on our part, we will not make this mistake again. (Also, of course, our intent from now on is to make sure that money which belongs in our Non-Federal account is correctly placed there in the tirst place!)

KEEP HOPE ALIVE

2

The attached copies of our Year End Report now show the following shanges:

*The correction of a \$50 addition error in our

11/28/88 report.

*The transfer of \$6,975 from our Federal account to our Non-Federal account, which includes the \$5,000

donation which the FEC first questioned.

*The transfer of another \$2,000 from our Federal account to our Non-Federal account, which we had incorrectly deducted from our Year End Report figures. This amount covered three checks for which we had been able to find no additional information on these three early donors (Paris-\$1,000; Compton-\$500; Higgins-\$500).

Our figures have been adjusted as shown on the attached copies of our Year End Report. These new figures will be reflected in all subsequent reports.

Please contact me if there are any further questions on this matter.

Sincerely,

Steven & Colle

Steven B. Cobble Executive Director

cc: Cirilo A. McSween Secretary/Treasurer

STATEMENT OF ORGANIZATION

	See rev	rerse side for instruction	ons)			001101
(a) NAME OF COMMITTEE IN FULL Keep Hope Alive			mittee	Fel	oruary 27,	1989
(b) Number and Street Accress (Check if accress is changed) 733 15th St., N.W.; ROOM \$700			3. FEC IDENTIFICATION NUMBER 4. IS THIS STATEMENT AN AMENDMENT? YES NO			
(c) Chy. State and ZIP Code Washington, D.C. 20005						
TYPE OF COMMITTEE (Check one)						
(a) This committee is a principal ca	mosion committee	. (Complete the candida)	e information belo			
	20 20					
(b) This committee is an authorized	committee, and to	NOT a principal campa	gn committee. (Co	omplete the cal	ndidate information b	elow.)
Name of Candidate	4.	Candidate Party Affikasor	Office Sough	1	State/District	
(c) This committee supports/oppos	es only one candid	tate	1. 188	and is NO	T an authorized come	71700
(c) The communes soppose		(name of c	andicate)			
(d) This committee is a	nal, State or subor	committe		mocratic, Repu	chican are)	Party.
	7.4			THE SECTION OF THE PARTY.		
(e) This committee is a separate se	egregated fund.					
	23	Carlos Carlos				
区域 (f) This committee supports/oppose	es more than one !	federal candidate and is	NOT a separate s	egregated fund	or a party committee) .
Name of Any Connected			ddress and		Relationship	
Organization or Affiliated Comm	vittee	ZIP	Code			
N/A	1					
	1					
	1					
Type of Connected Organization						
Corporation Corporation w/o Capit	al Stock Labor	Organization Membe	rship Organizatio	n Trade As	sociation _ Cooper	ative
Custodian of Records: identify by name.	address (phone n	umber - optional) and p	cention of the pers	on in possessio	on of committee book	s and
records. Full Name		Miling Address		no Title (or Position	
Steven B. Cobble		th St., N.W.		UU Exa	cutive Dire	acto
	Washin	gton, D.C. 20	0005	Exe	cutive bil	
Tressurer: List the name and address (ph	none number - opt	onal) of the treasurer of the	ne committee; and	the name and	address of any desig	nated
agent (e.g., assistant treasurer). Full Name	84:	alling Address		Title	or Position	
			N W . C.		_	ru/
Dr. Mary Berry	1000 V	ermont Ave.,	N.W.; Su.	1te #300	Treasur	_
(amendment)	Washin	igton, D.C. 2	0005		1160301	
Banks or Other Depositories: List all ba	inks or other deco	sitones in which the com	mittee deposits fu	nds, holds acc	ounts, rents safety of	DOOSII
boxes or maintains funds.					•	
Name of Bank, Deposite Independence Bank of	or Chicago	s: 7936 S. Mallo	t egge og 8	₹€° 4Rve.;	Chicago,	111.
National Bank of W	ashington:	P.O. Box 28	44; Washi	ngton, i).C. 20013	
Adams National Bank	c; 1627 K	St., N.W.; W	ashington/	, D.C. 2	20006	
						_
pertity that I have examined this Statement . (PE OR PRINT NAME OF TREASURER		my knowledge and belief ATURE OF TREASURER		nd complete.	DATE	
	3,314		//cX		_	_
Cirilo A. McSween	L	Tuilo ##	Was co	w	3-15-8	7
OTE: Submission of false, erroneous, or inc	complete informativ	on may subject the person	signing this State	ement to the re	nathes of 2 U.S.C. &	 137c
		NON SHOULD BE REPO				y.
	For turner	Intermation contact:			FED FOR	1 4
	Federal Ele	ction Commission			rec rukn	N 1
1	Local 202-	10-424-9530 376-3120	0000	RO	(revised	4/87)

1100069

REPORT OF RECEIPTS AND DISBURSEMENTS

The and street Check & different than previously reported

For Other Then An Authorises Committee RECFIVED RECFIVED (Summary Page) REFORTS 7 FF TO THE TOWN

89 MAR 27 /HII: 48

2 FEC IDENTIFICATION NUMBER

2 1 Pecm # 700	25,221	' ',
20005		nee qualified as a multicandidate DURING THIS Reporting Period (date
4. TYPE OF RE	PORT	
a A. 15 Quarterly Report	Monthly Report Due On.	
July 15 Quarterly Report	☐ Merch 20 ☐ A	ine 20 Cotober 20 by 20 November 20 upunt 20 December 20
October 15 Quarterly Report	_ Apri & _ A	eptember 20 December 20 Jenuary 31
January 3" Year End Report	Twelfth day report precedu	(Type of Section
31 Md Year Report (Non election Year Only)	election on	in the State of
Summary Summary Summary Summary Summary	COLUMN A This Period	COLUMN 8 Calendar Year-to-Date
a Dash or Hand January 1 19 N		\$ 000
Clash on mand at Beginning of Reporting Penod.	\$ 12 745. 52	S.C. Sale
Total Recepts from Line 18.	\$ 1/20/28	\$ 23,522.61
5 Subtotal add uines 6-billand 6(c) for Column Aland Lines 6 alland 6(c) for Column B;	\$ 181,842.40 \$ += 3 +1 -07	\$ 23,532.61
Tural Dispursements from Line 28)	\$ 35,797.29	\$ 17,447.50
Tash on Hand at 0 dse of Reporting Period (subtract Line 7 from Line	6(d)) \$ -CL (47.11	\$ 14 (45.11
Debts and Obligations Owed TO the Committee I tem be within Schedule Cland or Schedule D)	\$ 0.00	For further information contact:
Debts and Coligations Owed BY the Committee temize a libh Schedule Cland or Schedule D1	\$ 0.00	Federal Election Commissic 999 E Street NW Washington DC 20463
entir that I have examined this Report <mark>and to the best of my kno</mark> ticomplete	owiedge and belief it is true corre	Local 202-375-3120
Commission of Transmit	an Posts	
		Date
		00.007.0

Fig. His information may subject the person signing this fleport to the penalties of $0.05\,$ G §437g.

DETAILED SUMMARY PAGE AFCENCED

Ime of Committee (in full)	PARTY OF THE PARTY	8 To The Parks
C00.231.84	COLUMN A	COLUMN B
L RECEIPTS	Total This Period	Colondar Year-To-Core
CONTRIBUTIONS (other than loans) FROM:		
at Individuals/Persons Other Than Political Committees		مجازية والمراج أأران المراشيون
(i) hemized (use Schedule A).	6.6c	
(ii) Uniternized	NG. 32	-12-43-61-61-61
(iii) Total of contributions from individuals	33.39	11 75- 64 10,10.5
Di Political Party Committees	4 44	MALL LON
ic' Other Political Committees (such as PACs)	C.32	0
(d) TOTAL CONTRIBUTIONS (add 11(a)(ii), (b), and (c))	142.20	310 41 00
	AT WHEN THE PARTY NAMED IN	The state of the s
TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES .		क्य, हार्ग, इस
ALL LOANS RECEIVED		
LOAN REPAYMENTS RECEIVED	· College Coll	
	Car A Carl	
5 OFFSETS TO OPERATING EXPENDITURES (Refunds Rebeies, etc.)		:
REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		
OTHER RECEIPTS (Onidends. Interest. etc.)	30, 37	
B TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)	AND STREET STREET	10,32.61
IL DISBURSEMENTS	**************************************	
K. UISOUNSEMENTO		
OPERATING EXPENDITURES	35,724.60	77,447.21
TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES		
CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	,	
NOEPENDENT EXPENDITURES (use Schedule E)		
2 U.S.C. 441aid: Juse Schedule F)		
LCAN REPAYMENTS MADE		
E LOANS MADE		
REFUNDS OF CONTRIBUTIONS TO	TO THE WASHINGTON	
a Individuals Persons Other Than Political Committees		
p. Political Party Committees		
3 Other Political Committees (such as PACs)		
CONTRIBUTION REFUNDS (add 26(a), (b), and (c))		·
TOTHER DISBURSEVENTS : + falcol The withleblan'	A	
	1	
- TOTAL DISBURSEMENTS add 19 20 21 22 23 24 25. 26.0)	35, 797 24	77 H1.50
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TAL IONTR BUT CNS other than loans; (1) mune 11(d)	-4 *1.1 .	
1314, 131178 8, 131 REFUNDS from Line 26 d.		
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C TOTAL OPERATING EXPEND TURES from une 19	-	17.41

(Summary Page)

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USE PEC MANUNG LABE
ON
TYPE ON PRINT Keep Kon Alive Political Action Committee 83 MAY 23 AY 10: 29 Check if different then previously reported 2. FACE EVENTERCATION NUMBER 733 15 K St. N.W. : Room # 700 C00229286 CITY, STATE and ZIP CODE This committee qualified as a multicandidas committee DURING THIS Reporting Penad Washington, D.C. 20005 4. TYPE OF REPORT (a) April 15 Quarterly Report Monthly Report Due On February 20 October 20 July 15 Quarterly Report March 20 July 20 November 20 April 20 December 20 August 20 October 15 Quarterly Report May 20 September 20 January 31 Year End Report Twelfth day report preceding (Type of Election) July 31 Mid Year Report (Non-election Year Only) In the State of - Special Primary Election, Alabama #3 Thirtieth day report following the General Election on **Termination Report** in the State of YES is this Report an Amendment? (b) SUMMARY COLUMN A COLUMN B This Period Calendar Year-io-Date Covenng Penod Cash on Hand January 1, 19 19 (a) Cash on Hand at Beginning of Reporting Period (b) 146.045.1 Total Receipts (from Line 18) . . (c) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B) Total Disbursements (from Line 28) . .

> 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

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

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NAME OF COMMITTEE (IN & 4)

Cirilo A. McSween HIMUS

Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and or Schedule D)

Debts and Cb. 331chs Owed BY the Committee

(hemize all on Schedule Clandior Schedule D)

Federal Election Commission

contact:

999 E Street, NW

Washington, DC 20463

Toff Free 800-424-9530 Local 202-376-3120

NOTE. Submission of faise, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §43

Charles of the Land of the

FEC FORM.3

KEEP HOPE ALIVE

733 15th At., NW Room # 700 Washington, D.C. 20005 June 26, 1989

Inthony D. Raymond Senior Analyst Federal Election Commission 1979 E. St., N.W. Washington, D.C. 20463

Hear Mr. Raymond:

Enclosed is our amended Statement of Organization, amounting the teep Hope Alive PAC's new Secretary / Treesurer, Ir. Mary F. Berry. Attiough it is dated 3/15/89, Ir. Berry's "term as Secretary / Treasurer should begin upon your receipt of this letter.

Please give me a call if you have any questions, at 737-4673.

TS:01 MA TS NUL 68

NO TO THE PROPERTY OF THE PROP

Sincerely, 100073 Steven B. Cobble Executive Director





BEFORE THE FEDERAL ELECTION COMMISSION 4 PM 4: 08

In the Matter of)	
Keep Hope Alive Political Action Committee and)) MUR 2939)	SENSITIVE
Dr. Mary Berry, as)	

GENERAL COUNSEL'S REPORT

I. BACKGROUND

This matter was initiated by a referral from the Reports

Analysis Division ("RAD"). On August 8, 1989, the Commission

found reason to believe Keep Hope Alive Political Action

Committee ("the Committee") and its treasurer had violated

2 U.S.C. § 441b and 11 C.F.R. § 102.5(a). These findings related

to the Committee's receipt of \$5,850 in funds from four

unregistered organizations as follows:

Organization	Date	Amount
Friends of Jesse Jackson Washington, D.C.	7-13-88	\$5,000.00
John Wiley Price Campaign Dallas, Texas	7-9-88	250.00
Committee to Elect Rev. A.R. Polk River Rouge, Michigan	7-10-88	500.00
Mid-Brooklyn Political Association	9-15-88	100.00

The Commission also approved interrogatories and a request for

^{1.} The referral and First General Counsel's Report identified Cirilio A. McSween, as treasurer. This Office has learned that on June 27, 1989, the Committee filed a new Statement of Organization identifying Dr. Mary Berry as the treasurer. The letter accompanying the statement stated that her term began with the filing of the statement, although the statement itself is dated February 27, 1989.





documents with respect to these receipts. Counsel for the Committee filed the response on October 17, 1989. Attachment 1.

Keep Hope Alive Political Action Committee was organized in June 1988 and filed its original Statement of Organization with the Commission on June 30, 1989, listing Alvin J. Boutte of Chicago, Illinois, as treasurer and custodian of records and the Independence Bank of Chicago as the campaign depository and with the Committee located in Chicago. The Committee described itself as a committee that supports or opposes more than one federal candidate and is not a separate segregated fund or a party committee.

On October 27, 1988, the Committee filed a new Statement of Organization identifying Cirilio A. McSween of Chicago as treasurer and Steven B. Cobble of Washington, D.C., as custodian of records and added the National Bank of Washington as a depository and indicated a change of location to Washington, D.C. For 1988, the Committee reported total receipts of \$223,481 and total disbursements of \$77,486.

On January 30, 1989, the Committee again amended its
Statement of Organization to show a new address in the District.
The Committee further amended its statement on June 27, 1989, to show Dr. Mary Berry of Washington as the new treasurer and added the Adams National Bank of Washington as a depository. Through the 1989 Mid-Year Report, the Committee disclosed total receipts of \$138,394 and total disbursements of \$190,777 with cash on hand of \$93,663.42 and debts owed by the Committee of \$7,633.93. From its inception, the Committee's counsel has been the same as

counsel designated to represent the Committee in this matter.

II. FACTUAL AND LEGAL ANALYSIS

The Commission's regulations provide that organizations, which qualify as a political committee under the Act must register with the Commission. 11 C.F.R. § 100.5. Organizations qualifying as political committees must establish a separate account for federal activity which includes only funds subject to the limitations and prohibitions of the Act. 11 C.F.R. § 102.5(a). Organizations that are not political committees must either establish a separate account for federal activity or demonstrate that contributions made to federal committees did not include any funds prohibited under the Act. 11 C.F.R. § 102.5(b). The Act prohibits corporate and labor union contributions. 2 U.S.C. § 441b.

With respect to the \$250 contribution from the John Wiley Price Campaign, counsel states that Mr. Price, a county commissioner in Dallas, wrote the check from his campaign fund. Counsel further states that "[w]e have spoken with Mr. Price, and he has stated that there was at that time no corporate or labor money in his campaign account, nor did his campaign receive any personal contributions greater than \$5000." We note that Texas law prohibits corporate and labor union contributions.

Regarding the \$100 contribution from Mid-Brooklyn Political Association, counsel states that James Connolly, district leader of the 42nd State Assembly District in New York, signed a check for \$100 from the Mid-Brooklyn Political Association, which is described as "an account opened for the purpose of impacting

local races in Brooklyn." Counsel further states that "Mr. Connolly has informed us that the account contained no corporate or union money and no individual contributions of more than \$5000." We note that New York law permits limited corporate contributions and unlimited union contributions.

Counsel states that the Committee to Elect Rev. A.R. Polk has been written at its last known address but that a reply is still awaited. Accordingly, this Office contacted the office of the Secretary of State, where campaign reports are filed, to ascertain if this committee had been registered during 1988 and, if so, if copies of its reports could be obtained. No such committee had been registered with the state for 1988. This Office then contacted the Wayne County Clerk's office to ascertain if such a committee was a local committee registered with that office and again learned that no such committee had been registered with Wayne County. Finally, staff of this office called Rev. A.R. Polk on November 1. Rev. Polk stated that the committee was formed for an election within the church, not a political office. Although he said he did not recall making a contribution to Keep Hope Alive PAC, he did acknowledge that such a contribution may have been made during a meeting in Texas. He further stated that the funds in the committee's accounts did not come from corporations or unions but from members of the church.

Finally, counsel has clarified the circumstances regarding the \$5000 reported as received from Friends of Jesse Jackson.

Counsel states:

On June 20, 1988, a twenty-five dollar (\$25) per plate dinner was held at the Shiloh Baptist Church

located at 9th and P Streets, N.W., Washington, D.C. The dinner was advertised throughout the community, via flyers and invitations, as a dinner featuring the Reverend Jesse Jackson. Reverend Jackson had planned to attend, but could not due to a scheduling conflict. The guest speakers who did attend included Mayor Marion Berry and Congressman Walter Fauntroy. Approximately three hundred (300) people were at the dinner.

The organizers of the dinner opened an account at the Industrial Bank of Washington specifically for this event. The account was opened in the name "Friends of Jesse Jackson." The profits from the dinner— five thousand dollars (\$5000) — were placed into this account. Shortly after the dinner, according to one of the organizers of the event, Mr. Joseph Beavers, the organizers consulted with Jesse Jackson who suggested that the proceeds of the dinner be contributed to the Keep Hope Alive PAC.

On July 13, 1988, a five thousand dollar check representing all of the profits from the dinner was written to the Keep Hope Alive PAC. The "Friends of Jesse Jackson" bank account was thereupon closed out.

As discussed above, "Friends of Jesse Jackson" is not a formal organization. This was merely the name given to the bank account opened for the purpose of receiving and transferring the proceeds of a dinner held in Washington, D.C. at the Shiloh Baptist Church. The head organizer for this event was Mr. Joseph Beavers. Mr. Beavers is a clerk and a trustee of the Shiloh Baptist Church. Mr. Beavers can be reached at (202) 654-6391, and correspondence may be sent care of the Shiloh Baptist Church.

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Later in the response, counsel contends that the receipt of the \$5000 in funds from the Shiloh Baptist Church event was proper. Counsel states:

...Furthermore, we believe that the \$5000 representing the profits of the dinner at the Shiloh Baptist Church was properly transferred to the Keep Hope Alive PAC under 11 C.F.R. § 102.6. We do acknowledge, however, that this receipt originally was not properly reported. By virtue of 11 C.F.R. §§ 102.6(c)(5),(7), and § 104.3(a), the Keep Hope Alive PAC was not obligated to report the names of the individual attendees at the dinner, but it should have reported the aggregate \$5000 amount as a memo entry of unitemized contributions. Instead, the amount was reported as a receipt from a committee. This \$5000 and the other three contributions have since been transferred out of the Keep Hope Alive PAC's federal account and into its non-federal account,





and the PAC's reports have been amended to reflect this transfer. Therefore, we do not presently see a need to amend further the initial reports listing these contributions.

Counsel has not requested preprobable cause conciliation, but instead concluded her letter by stating that the Committee would "be happy to provide any further assistance needed by the Commission in order to close this matter without further action."

In the view of this Office, counsel's reliance on 11 C.F.R. § 102.6, particularly subsections (c)(5) and (7), is misplaced. Those provision deal with collecting agents for separate segregated funds. When Keep Hope Alive PAC registered with the Commission, it indicated on its Statement of Organization that it was not a separate segregated fund. Moreover, there are no apparent facts which would suggest that it is a separate segregated fund.

Nevertheless, counsel by citing to these regulations does represent and assert that Friends of Jesse Jackson was a fundraising agent for Keep Hope Alive PAC. She states that Friends of Jesse Jackson was not a formal organization but merely the name used to open a bank account into which the proceeds of the Shiloh Baptist Church dinner were deposited. All of the funds deposited into this account were apparently transferred to Keep Hope Alive PAC and the account closed.

Accepting these representations as valid, the forwarding provisions of the Act and regulations at 2 U.S.C. § 432(b)(2) and 11 C.F.R. § 102.8(b) are the initial reference point. Because the amount of the individual contributions was only \$25 per

person, these provisions required that the person receiving these contributions forward them to the committee within 30 days. See 11 C.F.R. § 102.8(b)(1). The event was held on June 20, 1988, and the funds disbursed to Keep Hope Alive PAC on July 13, 1988, or 23 days later. Thus, to the extent they may be applicable, the forwarding provisions of the Act and regulations were complied with.

Counsel has stated that the Committee should have reported these funds as unitemized contributions from individuals rather than a contribution from a political committee. We note that if counsel's contention that Friends of Jesse Jackson were merely a fundraising agent for the Committee and not itself a political committee were accepted, then the Committee should have reported gross (not net) proceeds and the expenses of the dinner as disbursements.²

The facts as presently known, however, suggest that Friends of Jesse Jackson may have functioned as a political committee. A "committee" is defined to include "any...group of persons" who receive more than \$1,000 in contributions or make more than

^{2.} The regulations do not speak specifically to situations where a fundraising agent pays expenses of the fundraising activity from the fundraising proceeds themselves. Where that occurs, however, the recipient committee should report the gross proceeds and the expenses paid. If a separate bank account is used to make the initial deposit of the proceeds and from which expenses are paid, the account should be listed as a campaign depository. If that is done, the forwarding provisions are met with the deposit into this account. See, Advisory Opinion 1980-42 and MUR 2808. If, instead, the fundraising agent pays expenses from its own resources, not from the proceeds, such payments are advances and should be reported by the recipient committee as in-kind contributions unless they are reimbursed on a timely basis.





\$1,000 in expenditures during any calendar year. 2 U.S.C. § 431(4)(A). Friends of Jesse Jackson is a name used by a group of persons who held a fundraising event. The group charged persons attending the event \$25 per person. It paid the expenses of the event and deposited the proceeds into a separate bank account. From this account, it made a \$5,000 contribution to Keep Hope Alive. Thus, it appears that Friends of Jesse Jackson qualified as a political committee under the Act and should have registered and reported, even though it may have also been able to terminate. Accordingly, we recommend that the Commission find reason to believe Friends of Jesse Jackson and Joseph Beavers, acting as treasurer, violated 2 U.S.C. §§ 433 and 434. Furthermore, we do not know what the fliers and invitations to dinner said or the circumstances relating to the request or suggestion by Reverend Jackson or his representative that the funds be contributed to Keep Hope Alive PAC. 3

As noted earlier, the information received from counsel indicates that it does not appear the contributions received from the John Wiley Price Campaign and the Mid-Brooklyn Political Association, were made from accounts containing funds prohibited under the Act or in excess of the Act's limitations. Rev. A.R. Polk told staff of this office that funds in the account of the

^{3.} If an investigation shows that these funds were solicited on behalf of Reverend Jackson's candidacy or earmarked by the contributors to his candidacy, a further question would arise whether Reverend Jackson has effectively directed or controlled the making of this contribution so that it should also have been attributed to him or his principal campaign committee as well as Friends of Jesse Jackson and so reported by his committee and Keep Hope Alive PAC. See 11 C.F.R. § 110.6.

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Committee to Elect Rev. A.R. Polk came from members of his church. Furthermore, counsel has clarified that the funds initially reported as received from Friends of Jesse Jackson consisted of individual contributions of \$25 and did not come from an account that included any corporate or union funds.

Thus, it does not appear that these funds included prohibited funds under 2 U.S.C. § 441b or that their deposit violated 11 C.F.R. § 102.5(a). Because of the need to further investigate whether Friends of Jesse Jackson was a political committee and the possible impact of the resolution of this issue on Keep Hope Alive, we do not at this time make any recommendations with respect to Keep Hope Alive. Once the investigation is complete, the Section 441b and 102.5(a) issues can be addressed in a brief.

1. Find reason to believe Friends of Jesse Jackson and Joseph Beavers, acting as treasurer, violated 2 U.S.C. §§ 433 and 434.

^{4.} If it is determined that Friends of Jesse Jackson was a political committee, then its \$5,000 contribution to Keep Hope Alive would be within the contribution limitation of 2 U.S.C. \$ 441a(a)(1)(C) for contributions to unauthorized committees. As noted in the report, if it is determined that Friends of Jesse Jackson were merely a fundraising agent and not a political committee, then Keep Hope Alive PAC should have reported the gross receipts as well as the expenses and would have violated 2 U.S.C. \$ 434(b) by failing to do so. Whether further findings with respect to Keep Hope Alive PAC are necessary will depend on the resolution of the issue regarding the status of Friends of Jesse Jackson. See also, Footnotes 2 and 3.

2. Approve the attached letter, factual and legal analysis, and interrogatories and request for documents.

Lawrence M. Noble General Counsel

11-1289

BY:

Lois G. Kerner

Associate General Counsel

Attachments

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1. Response

Proposed letter, factual and legal analysis, and interrogatories and request for documents

Staff persons: Jeffrey D. Long George F. Rishel

FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

TO:

LAWRENCE M. NOBLE GENERAL COUNSEL

FROM:

MARJORIE W. EMMONS/DELORES HARRIS

COMMISSION SECRETARY

DATE:

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NOVEMBER 17, 1989

SUBJECT:

MUR 2939 - GENERAL COUNSEL'S REPORT DATED NOVEMBER 13, 1989

The above-captioned document was circulated to the Commission on Wednesday, November 15, 1989 at 11:00 a.m.

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

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

This matter will be placed on the meeting agenda for Tuesday, November 28, 1989 at 10:00 a.m.

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

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

MUR 2939

Keep Hope Alive Political Action Committee and Dr. Mary Berry, as treasurer

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on November 28, 1989, do hereby certify that the Commission decided by a vote of 5-0 to take the following actions in MUR 2939:

- Find reason to believe Friends of Jesse Jackson and Joseph Beavers, acting as treasurer, violated 2 U.S.C. \$\$ 433 and 434.
- 2. Approve the letter, factual and legal analysis, and interrogatories and request for documents as recommended in the General Counsel's report dated November 13, 1989.

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

Commissioner McGarry was not present.

Attest:

Nov. 29, 1989

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Mariorie W. Emmons

Secretary of the Commission



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FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20463

December 7, 1989

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Joseph Beavers, Acting Treasurer Friends of Jesse Jackson c/o Shiloh Baptist Church 1500 9th Street, N.W. Washington, D.C. 20001

RE: MUR 2939

Friends of Jesse Jackson and Joseph Beavers, acting as treasurer

Dear Mr. Beavers:

On November 28, 1989, the Federal Election Commission found that there is reason to believe Friends of Jesse Jackson ("the Committee") and you, as treasurer, violated 2 U.S.C. §§ 433 and 434, provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against the Committee and you, as treasurer. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office along with answers to the enclosed questions within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

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

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

Joseph Beavers Page 2 recommending declining that pre-probable cause conciliation be pursued. The Office of the General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, the Commission will not entertain requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent. Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address, and telephone number of such counsel, and authorizing such counsel to receive any notifications and 9 other communications from the Commission. This matter will remain confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be 3 made public. For your information, we have attached a brief description 0 of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Jeffrey D. Long, the staff member assigned to this matter, at (202) 376-5690.

sincerely,

Danny L. McDonald

Chairman

Enclosures
Factual and Legal Analysis
Procedures
Designation of Counsel Form
Ouestions

PEDERAL ELECTION CONMISSION PACTUAL AND LEGAL ANALYSIS

RESPONDENTS: Friends of Jesse Jackson MUR: 2939 and Joseph Beavers, acting

as treasurer

I. GENERATION OF MATTER

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities.

2 U.S.C. § 437g(a)(2).

II. FACTUAL AND LEGAL AMALYSIS

Under the Federal Election Campaign Act of 1971, as amended ("the Act"), a "committee" is defined to include "any...group of persons" who receive more than \$1,000 in contributions or make more than \$1,000 in expenditures during any calendar year.

2 U.S.C. \$ 431(4)(A). Such political committees are required to file a Statement of Organization with the Commission within 10 days of becoming a political committee and to file periodic reports of its receipts and disbursements. 2 U.S.C. \$\$ 433 and 434.

Keep Hope Alive Political Action Committee reported the receipt of a \$5,000 from Friends of Jesse Jackson on July 13, 1988 as the receipt of a contribution from a political committee. Friends of Jesse Jackson apparently is a name used by a group of persons who held a fundraising event at the Shiloh Baptist Church on June 20, 1988. The event was advertised by fliers and invitations distributed in the community. The group charged persons attending the event \$25 per person. It apparently paid

Accordingly, there is reason to believe Friends of Jesse Jackson and Joseph Beavers, acting as treasurer, violated 2 U.S.C. §§ 433 and 434.

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^{1.} If this activity were the only federal election activity by Friends of Jesse Jackson, it could also have terminated after filing the July and October Quarterly reports.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

MUR 2939

INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS

TO: Joseph Beavers, Acting Treasurer Friends of Jesse Jackson c/o Shiloh Baptist Church 1500 9th Street, N.W. Washington, D.C. 20001

In furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby requests that you submit answers in writing and under oath to the questions set forth below within 15 days of your receipt of this request. In addition, the Commission hereby requests that you produce the documents specified below, in their entirety, for inspection and copying at the Office of the General Counsel, Federal Election Commission, Room 659, 999 E Street, N.W., Washington, D.C. 20463, on or before the same deadline, and continue to produce those documents each day thereafter as may be necessary for counsel for the Commission to complete their examination and reproduction of those documents. Clear and legible copies or duplicates of the documents which, where applicable, show both sides of the documents may be submitted in lieu of the production of the originals.

Joseph Beavers Page 2 INSTRUCTIONS In answering these interrogatories and request for production of documents, furnish all documents and other information, however obtained, including hearsay, that is in possession of, known by or otherwise available to you, including documents and information appearing in your records. Each answer is to be given separately and independently, and unless specifically stated in the particular discovery request, no answer shall be given solely by reference either to another answer or to an exhibit attached to your response. The response to each interrogatory propounded herein shall set forth separately the identification of each person capable of furnishing testimony concerning the response given, denoting separately those individuals who provided informational, documentary or other input, and those who assisted in drafting the interrogatory response. If you cannot answer the following interrogatories in full after exercising due diligence to secure the full information to do so, answer to the extent possible and indicate your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information. Should you claim a privilege with respect to any documents, communications, or other items about which information is requested by any of the following interrogatories and requests for production of documents, describe such items in sufficient detail to provide justification for the claim. Each claim of privilege must specify in detail all the grounds on which it rests. Unless otherwise indicated, the discovery request shall refer to the time period from January 1, 1988 to the present. The following interrogatories and requests for production of documents are continuing in nature so as to require you to file supplementary responses or amendments during the course of this investigation if you obtain further or different information prior to or during the pendency of this matter. Include in any supplemental answers the date upon which and the manner in which such further or different information came to your attention.

MUR 2939

For the instruction follows:

"You" ! these disc employees,

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MUR 2939 Joseph Beavers Page 3

DEFINITIONS

For the purpose of these discovery requests, including the instructions thereto, the terms listed below are defined as follows:

"You" shall mean the named respondent in this action to whom these discovery requests are addressed, including all officers, employees, agents or attorneys thereof.

"Persons" shall be deemed to include both singular and plural, and shall mean any natural person, partnership, committee, association, corporation, or any other type of organization or entity.

"Document" shall mean the original and all non-identical copies, including drafts, of all papers and records of every type in your possession, custody, or control, or known by you to exist. The term document includes, but is not limited to books, letters, contracts, notes, diaries, log sheets, records of telephone communications, transcripts, vouchers, accounting statements, ledgers, checks, money orders or other commercial paper, telegrams, telexes, pamphlets, circulars, leaflets, reports, memoranda, correspondence, surveys, tabulations, audio and video recordings, drawings, photographs, graphs, charts, diagrams, lists, computer print-outs, and all other writings and other data compilations from which information can be obtained.

"Identify" with respect to a document shall mean state the nature or type of document (e.g., letter, memorandum), the date, if any, appearing thereon, the date on which the document was prepared, the title of the document, the general subject matter of the document, the location of the document, the number of pages comprising the document.

"Identify" with respect to a person shall mean state the full name, the most recent business and residence addresses and the telephone numbers, the present occupation or position of such person, the nature of the connection or association that person has to any party in this proceeding. If the person to be identified is not a natural person, provide the legal and trade names, the address and telephone number, and the full names of both the chief executive officer and the agent designated to receive service of process for such person.

"And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and requests for the production of documents any documents and materials which may otherwise be construed to be out of their scope.

MUR 2939 Joseph Beavers Page 4 These questions relate to the event held on June 20, 1988, at the Shiloh Baptist Church which resulted in funds being raised that were eventually contributed to the Keep Hope Alive Political Action Committee. Describe in detail this event including the identity of the organizers and who spoke at the event. State whether the cost for attending this event was solicited on behalf of Reverend Jesse Jackson or his principal campaign committee. State further whether person(s) who attended the event earmarked or designated, in any manner, his or her payment as made on behalf of, or directed to, Reverend Jackson or his principal campaign committee. State whether persons making payments to attend this event were told their contributions would qo to Reverend Jackson, his principal campaign committee, or Keep Hope Alive Political Action Committee. Provide copies of each type of flier and invitation used to advertise this event or solicit persons to purchase ticker or make contributions with respect to this event. State the amount of total (gross) proceeds realized from M this event and itemize all expenses for this event to include the 3 payee, the amount, and the purpose of the payment. State whether all expenses were paid for from the proceeds and whether payments 0 were made from the bank account at the Industrial Bank of Washington. If not, identify each expense that was paid for from other sources and identify the source who paid for each such expense. Identify all goods or services provided without charge with respect to this event. Identify the account number and the person(s) who opened the account at the Industrial Bank of Washington into which the proceeds were deposited and who had authority to sign checks drawn on this account. Provide copies of the bank statements for this account for the period covering June and July 1988. State whether payments to attend this event were made in cash or by check and, if both, give the approximate percentage of each. State whether all checks were deposited into the account at the Industrial Bank of Washington. Identify the person(s) who suggested or requested that the proceeds from this event be contributed to the Keep Hope Alive Political Action Committee. State the date and place where this request or suggestion was made and who was present at the time.



January 26, 1990

Federal Election Commission Danny L. McDonald, Chairman 999 E Street, NW Washington, DC 20463

Re: MUR 2939

Dear Sir:

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This correspondence is in reply to your letter dated December 7, 1989, and received by me January 7, 1990.

I contacted Mr. Jeffrey D. Long, the staff member assigned to this case by telephone, who advised that I within 20 days answer the questions on MUR 2939 page 4, which are as follows:

Question Number 1. Answer -- In the early spring of 1988 Pastor Henry C. Gregory, III of Shiloh Baptist Church and I was discussing the candidacy of Jesse Jackson for President of the U.S.A. who had a strong message but a shoe string budget and he asked me about putting on a fundraiser for Rev. Jackson because he would need a lot of money if he was going to do well in the primaries and win the Democratic Party candidacy for President or Vice President at the Democratic National Convention in Atlanta, Georgia. I agreed and contacted Mrs. Mattie Robinson a very active member of Shiloh and head of the Missionary Department and Mr. Horace Roberts, one of the Senior Deacons and a very active community worker.

We three agreed to Chair and Co-Chair a Fundraiser for Revision, the proceeds after expenses to help him win at the Democratic National Convention in Atlanta, GA.

Our first job was to organize a committee, which we agreed to name "Friends of Jesse Jackson". We also agreed on Honorary Chairpersons, see Letterhead attached.

We agreed on D.C. City Council Supporters, see Letterhead attached.

We got friends to join our committee, see Letterhead attached.

We were able to get as our guest speaker, Marion S. Barry, the Major of the District of Columbia.

Question Number 2. Answer -- The cost for attending this event was solicited on behalf of Rev. Jesse Jackson, see Invitation and return card. Committee Letterhead and Flier attached. All persons attending the affair was told that after expenses, all proceeds would be given to Rev. Jackson to help him win in Atlanta, GA.

Question Number 3. Answer -- The total receipts were \$10,466.44

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FEBRUAL ELECTION COMMISS

with Disbursements of \$5,314.00 expenses and \$5,152.44 to be given to Rev. Jesse Jackson. See attached itemized list. All disbursements for expenses was paid from the Industrial Bank of Washington by check.

Question Number 4. Answer -- The account was set up at the Industrial Bank of Washington. Checking Account Number 035-091-5 in the name of Friends of Jesse Jackson Banquet Fund Raiser with three people authorized to sign checks, Joseph A. Beavers, Mattie Robinson and Horace Roberts. Payments to attend the banquet was made both in cash and checks and were deposited in the Industrial Bank of Washington. I can't remember the percentage of each deposit but they were mostly checks. All checks and cash was deposited in this account. There was no other account.

Question Number 5. Answer -- Rev. Jesse Jackson was speaking at the National Association for the Advancement of Colored People's Convention held at the Sheraton Park Hotel, Washington, DC. The committee arranged to make the contribution to him personally on the night he spoke. The check was made out to Rev. Jesse Jackson in the amount of \$5,152,44. After the check was presented to him in the Grand Ballroom where he spoke, later that night at the reception, Rev. Jackson came to me and asked me to change the check, and make the check out to Keep Hope Alive for \$5,000.00 and give the \$152.44 to yourself for part of your expenses to come down to Atlanta, GA to work for my candidacy at the Democratic National Convention. Present was Horace Roberts, Co-Chair and other members of the "Friends of Jesse Jackson Committee".

Sincerely,
Joseph A. Beavers

p.s. Your other communication was sent to Shiloh Baptist Church. My address is 3215 Park View Road, Chevy Chase, MD 20815

Enclosures:

Invitation & Return Card 1-2 Financial Report of 6/20/88 -3-Jesse Jackson Letterhead -4-

Fundraiser Flier -5Bank Statements, June & July 1988 -4-7-

RECEPTION & DININER LICKET - 85

HONORARY CHAIRPERSONS

The Hon. Marion S. Barry, Jr. The Hon. Walter E. Fauntroy Rev. Henry C. Gregory, III Mayor of the District of Columbia

D.C. Delegate to U.S. Congress

Shiloh Baptist Church

D.C. CITY COUNCIL SUPPORTERS

Hon, Dave Clark . Hon, H. R. Crawford . Hon, Wilhelmina Rolark . Hon, Frank Smith Hon. Nadine Winters . Hon. Harry L. Thomas . Hon. John Ray

DINNER COMMITTEE

Joseph A. Beavers · Chairperson

Mattie Robinson · Co-Chairperson

Horace Roberts · Co-Chairperson

Leslie Baskerville Jeanie Bates Robert Bates G. F. Bingham Minor Christian Christine Clark Bernard Demczuk Rev. David Eaton Willie Fordham Lavonia P. Fairfax Rev. Ernest R. Gibson

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Licia Green Marion O. Greene, Jr. John Howard Monteria Ivey **Barry Jerrels** Shari Jerrels James Johnson **Donna Jones** Carl W. Lee Gloria E. Miller Mildred Moseley

Ella J. Pitts Ronald Richardson Calvin Rolark **Delores Sawyer** Barbara Leus Simmons Mrs. Joseph D. Speller Cirtie Mae Turner Mary Bates Washington Richard Whitehurst John Williams Stanley Williams

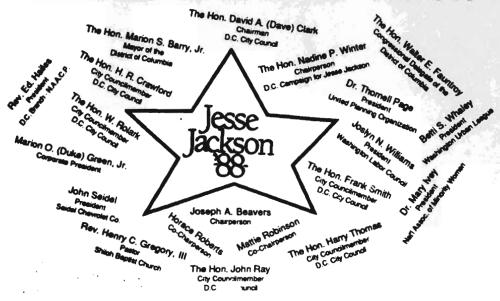
FALIBIT-1-

FUNDRAISLR I OR JESSE JACKSON



MONDAY • JUNE 20, 1988 SHILOH FAMILY LIFE CENTER NINTH AND P STREETS, N.W. WASHINGTON, D.C. 20001

JESSE JACKSON FOR PRESIDENT — THE MAN WITH VISION —



PLEASE JOIN
FRIENDS OF JESSE JACKSON
AT A
RECEPTION AND DINNER
Fundraiser to Help Jesse Win at the
DEMOCRATIC NATIONAL CONVENTION IN ATLANTA, GA

Monday evening, the Twentieth of June Nineteen Hundred and Eighty-eight

Guest Speaker the Honorable Marion S. Barry, Jr. Mayor of the District of Columbia

Shiloh Family Life Center Ninth and "P" Streets, N.W., Washington, D.C. 20001

Hospitality Hour: 6:30 p.m. Dinner 7:00 p.m.

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Dress Optional R.S.V.P. Card Enclosed (202) 232-4200

THE ATLANTA DEMOCRATIC CONVENTION
A CRITICAL CROSSROAD IN OUR NATION'S HISTORY

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JESSE JACKSON—88—FOR PRESIDENT RECEPTION & DINNER FUNDRAISER

Monday, June 20, 1988 . Shiloh Family Life Center

	0.00 per person — subscription 10.00 for table of ten	(\$35.00 - tax deductible) (\$350.00 - tax deductible)			
	Yes, I will attend and enclosed is n	ny contribution of \$	for		
	person(s) @ \$50.00 or _	table(s) @			
	No, I cannot attend, but enclosed is	s my contribution of \$			
		cks payable to:			
	Friends of Jesse Jacks	on • Banquet Fundraise	r		
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FILE OF JESSE JACKSON SHILOH FAMILY LIFE CENTER 1510 9TH STREET, N. W. WASHINGTON, D. C. 20001

HONORARY CHAIRPERSONS
The Hon. Marion S. Barry, Jr.
Mayor of the District of Columbia
The Hon. Waltor E. Fenntrey
D.C. Delegate to U. S. Congruss
Rev. Henry C. Gregory, III
Pastor, Shiloh Baptist Church

D. C. CITY COUNCIL SUPPORTERS

FINANCIAL REPORT OF THE JUNE 20TH FUNDRAISER TO HELP JESSE JACKSON WIN AT THE DEMOCRATIC NATIONAL CONVENTION IN ATLANTA, GEORGIA

Hon. Dave Clark Hon. H. R. Crawford Hon. Withelmine Relark	Receipts \$ 10,466.44					
Hon. Frank Smith Hon. Nadine Winters	DISBURSEMENTS					
E xs. Harry L. Thomas H xs. John Ray	Printing \$ 857.65					
DINER COMMITTEE Jol pli A. Beavers, Chairperson Mattle Robinson, Co-Chairperson	Postage, Posters, Office Supplies, E.T.C. 589.19					
Hérage Roberts, Co-Chairperson Members:	Champagne, Wine & Snacks 410.88 for Reception					
Leslik Baskerville Jeanie Bates Robert Bates	Flowers for Head Table 52.50					
G. F. Bingham	Dinner, E.T.C. 2,833.78					
Miper Christian Christine Clark Bernard Demczuk	Annette Anderson, Soloist 50.00					
Rev. David Eaton Willie Fordham	Judy Williams, Soloist 50.00					
Lavenia P. Fairlax Rev. Ernest R. Gibson	Everett Williams, Organist 150.00					
Licia Green Misson O. Greene, Jr.	Delores Sawyer, Secty. Work 150.00					
John Howard Monjeria Ivey	Returned Checks					
Mary Ivey Barry Jerrels	Hatcher, Whitson & Fields 170.00					
Shafi Jerreis James Johnson Dōnna Jones	\$5,314.00					
Carl W. Lee Gloria E. Miller Mildred Moseley Ella I. Pitta	Balance to give Rev. Jesse Jackson \$ 5,152.44					
Ronald Richardson Calvia Rolark Barbara Lett Simmons Mrs. Joseph D. Speller						
Cirtie Mae Turner Mary Bates Washington						
Richard Whitehurst John Williams	Joseph A. Beavers, Chairman Mattie Robinson, Co-Chair					

Mattie Robinson, Co-Chair Horace Roberts, Co-Chair FIGURE OF JESSE JACKSON SHILOH FAMILY LIFE CENTER
1510 9TH STREET, N. W.
WASHINGTON, D. C. 20001

HONORARY CHAIRPERSONS
The Hon. Marion 8. Barry, Jr.
Mayor of the District of Columbia
The Hon. Walter E. Fauntroy
D.C. Delegate to U. S. Congress
Rev. Henry C. Gregory, III
Paator, Shiloh Baptist Church

D. C. CITY COUNCIL SUPPORTERS
Hon. Dave Clark
Hon. H. R. Crawford
Hon. Wilhelmaa Rolark
Hon. Frank Smith
Hon. Nadine Winters
Hon. Harry L. Thomas
Hon. John Ray

DINER COMMITTEE
Joreph A. Beavers, Chairperson
Mattle Robinson, Co-Chairperson
Procace Roberts, Co-Chairperson

Members: Leslie Baskerville Jeanie Bates Robert Bates G. F. Bingham Migor Christian Christine Clark Bernard Demczuk Rev. David Eaton Willie Fordham Eyonia P. Fairfax Rev. Ernest R. Gibson Licia Green Marion O. Greene, Jr. John Howard **My**nteria Ivey Mary Ivey Barry Jerrels Shari Jerrels James Johnson Donna Jones Carl W. Lee Gloria E. Miller Mildred Moseley Ella I. Pitts Ronald Richardson Caivin Rolark Barbara Lett Simmons Mrs. Joseph D. Speller Cirtie Mae Turner Mary Bates Washington Richard Whitehurst John Williams

FUNDRAISER TO HELP JESSE WIN AT THE DEMOCRATIC NATIONAL CONVENTION IN ATLANTA, GA.



FRIENDS OF JESSE JACKSON INVITE YOU TO ATTEND A RECEPTION AND DINNER

Guest Speaker the Honorable Marion S. Barry, Jr. Mayor of the District of Columbia

Monday, June 20, 1988 Hospitality Hour: 6:30 p.m. Dinner: 7:00 p.m.

Shiloh Family Life Center 9th and P Streets, N.W. Washington, D.C. 20001

THE ATLANTA DEMOCRATIC CONVENTION
A CRITICAL CROSSROADS IN OUR NATION'S HISTORY

TICKETS \$50.00 (\$35.00 tax deductible)

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DRESS OPTIONAL

For further information call The Family Life Center at (202) 232-4200

EXIBIT 60

JS-D4 D1 INDUSTRIAL BANK OF WASHINGTON 4812 GEORGIA AVENUE WASHINGTON DC 20011 PHONE:2U2-722-2G33

FRIENDS OF JESSE JACKSON BANQUET FUND RAISER SENJ STMT TO MINICIPAL CTR C/O L1Z

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CHECKING ACCOUNT:

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06/36/88 THRU 07/29/88

PAGE 1

OUR CUSTOMER SERVICE LINE 722-2031 IS OPEN FROM 9 AM TO 3 PM MONDAY - FRIDAY FOR ANY INQUIRIES REGARDING YOUR CHECKING OR SAVINGS ACCOUNTS.

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CHECK #		94			1	59.28		37/06/88	6,239.07
DEPOSIT							175.00	37/68/88	6,414.07
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> FRIENDS OF JESSE JACKSON JANGUFT FUND RAISER C/O SHILOH FAMILY LIFE CENTER 1510 9TH STREET NW WASHINGTON DC 20001

CHECKING ACCOUNT: 350915

06/15/38 THRU 06/3C/83

PAGE 1

OUR CUSTOMER SERVICE LINE 722-2031 IS OPEN FROM ? AM TO 3 PM MONDAY - FRIDAY FOR ANY INQUIRIES REGARDING YOUR CHECKING OR SAVINGS ACCOUNTS.

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JESSE JACKSON—88—FOR PRESIDENT
RECEPTION AND DINNER FUND RAISER

To belp him win the
Democratic National Convention
BOLD LEADERSHIP — NEW DIRECTION
Guest Speaker: Honorable Marion Barry, Jr.
Mayor, Washington, D.C.
MONDAY, JUNE 20, 1988
Reception - 6:30 p.m. Dinner - 7:00 p.m.
SHILOH FAMILY LIFE CENTER
Ninth and "P" Streets, N.W. Washington, D.C.
DONATION

\$50.00





BEFORE THE FEDERAL ELECTION COMMISSION 90 FEB 21 AM 11: 33

In the Matter of
Friends of Jesse Jackson
and Joseph Beavers, acting
as treasurer

SENSITIVE

Keep Hope Alive Political Action Committee and Dr. Mary Berry, as treasurer MUR 2939

COMPREHENSIVE INVESTIGATIVE REPORT

I. BACKGROUND

This matter was initiated by a referral from the Reports Analysis Division ("RAD"). On August 22, 1989, the Commission found reason to believe Keep Hope Alive Political Action Committee ("the Committee") and its treasurer had violated 2 U.S.C. § 441b and 11 C.F.R. § 102.5(a). These findings related to the Committee's receipt of \$5,850 in funds from four unregistered organizations. The Commission also approved interrogatories and a request for documents with respect to these receipts. Counsel for the Committee filed the response on October 17, 1989. The response was previously discussed in the General Counsel's Report, signed November 13, 1989. On November 28, 1989, the Commission further found reason to believe Friends of Jesse Jackson and Joseph Beavers, acting as treasurer, violated 2 U.S.C. § 433 and 434 and approved interrogatories and a request for documents to Mr. Beavers. Mr. Beavers filed his response on January 30, 1990. This reports reviews the earlier response from Keep Hope Alive with respect to Friends of Jesse Jackson and the latest response from Joseph Beavers on behalf of



Friends of Jesse Jackson.

Reep Hope Alive Political Action Committee was organized in June 1988 and filed its original Statement of Organization with the Commission on June 30, 1989, listing Alvin J. Boutte of Chicago, Illinois, as treasurer and custodian of records, the Independence Bank of Chicago as the campaign depository, and the Committee's address as Chicago. The Committee described itself as a committee that supports or opposes more than one federal candidate and not a separate segregated fund or a party committee. For 1988, the Committee reported total receipts of \$223,481 and total disbursements of \$77,486. Through the 1989 Mid-Year Report, the Committee disclosed total receipts of \$138,394 and total disbursements of \$190,777 with cash on hand of \$93,663.42 and debts owed by the Committee of \$7,633.93.

II. FACTUAL ANALYSIS

The Commission's regulations provide that organizations, which qualify as a political committee under the Act must register with the Commission. 11 C.F.R. § 100.5. Organizations qualifying as political committees must establish a separate account for federal activity which includes only funds subject to the limitations and prohibitions of the Act. 11 C.F.R. § 102.5(a). Organizations that are not political committees must either establish a separate account for federal activity or demonstrate that contributions made to federal committees did not include any funds prohibited under the Act. 11 C.F.R. § 102.5(b). The Act prohibits corporate and labor union contributions. 2 U.S.C. § 441b.

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In the earlier response, counsel stated with respect to

Friends of Jesse Jackson:

On June 20, 1988, a twenty-five dollar (\$25) per plate dinner was held at the Shiloh Baptist Church located at 9th and P Streets, N.W., Washington, D.C. The dinner was advertised throughout the community, via flyers and invitations, as a dinner featuring the Reverend Jesse Jackson. Reverend Jackson had planned to attend, but could not due to a scheduling conflict. guest speakers who did attend included Mayor Marion Barry and Congressman Walter Fauntroy. Approximately three hundred (300) people were at the dinner.

The organizers of the dinner opened an account at the Industrial Bank of Washington specifically for this event. The account was opened in the name "Friends of Jesse Jackson." The profits from the dinner-- five thousand dollars (\$5000) -- were placed into this Shortly after the dinner, according to one of the organizers of the event, Mr. Joseph Beavers, the organizers consulted with Jesse Jackson who suggested that the proceeds of the dinner be contributed to the Keep Hope Alive PAC.

On July 13, 1988, a five thousand dollar check representing all of the profits from the dinner was written to the Keep Hope Alive PAC. The "Friends of Jesse Jackson" bank account was thereupon closed out.

As discussed above, "Friends of Jesse Jackson" is not a formal organization. This was merely the name given to the bank account opened for the purpose of receiving and transferring the proceeds of a dinner held in Washington, D.C. at the Shiloh Baptist Church. head organizer for this event was Mr. Joseph Beavers. Mr. Beavers is a clerk and a trustee of the Shiloh Baptist Church. Mr. Beavers can be reached at (202) 654-6391, and correspondence may be sent care of the Shiloh Baptist Church.

Later in the response, counsel contends that the receipt of the \$5000 in funds from the Shiloh Baptist Church event was proper. Counsel states:

...Furthermore, we believe that the \$5000 representing the profits of the dinner at the Shiloh Baptist Church was properly transferred to the Keep Hope Alive PAC under 11 C.F.R. § 102.6. We do acknowledge, however, that this receipt originally was not properly reported. By virtue of 11 C.F.R. § 102.6(c)(5),(7), and

\$ 104.3(a), the Keep Hope Alive PAC was not obligated to report the names of the individual attendees at the dinner, but it should have reported the aggregate \$5000 amount as a memo entry of unitemized contributions. Instead, the amount was reported as a receipt from a committee. This \$5000 and the other three contributions have since been transferred out of the Keep Hope Alive PAC's federal account and into its non-federal account, and the PAC's reports have been amended to reflect this transfer. Therefore, we do not presently see a need to amend further the initial reports listing these contributions.

B. Review of Response from Friends of Jesse Jackson

Joseph Beavers states in his response that, at the suggestion
of Pastor Henry C. Gregory of the Shiloh Baptist Church, he
organized a fundraiser on behalf of the Rev. Jesse Jackson's
candidacy for the Democratic Party's presidential nomination at
the convention in Atlanta. He agreed to chair the fundraiser and
enlisted the assistance of Mattie Robinson and Horace Roberts,
active members of the church. The proceeds after expenses from
the fundraiser were to help Rev. Jackson win the nomination.

The group first organized a committee known as the "Friends of Jesse Jackson." Its honorary chairpersons were Mayor Marion S. Barry, the Honorable Walter E. Fauntroy, and Rev. Henry C. Gregory. Its also enlisted several District of Columbia city council members as supporters and a number of others as friends. The group advertised the fundraiser with flyers and invitations. This material described the event as a "Fundraiser for Jesse Jackson" or as "Jesse Jackson--88--For President." It was described to participants as a fundraiser to help Rev. Jackson win the nomination. Mayor Barry was the guest speaker. The fundraiser took place on June 20, 1988, at the Shiloh Family Life

Center at 9th and P Streets, N.W., in the District. The cost of the event was \$50 per person.

An account was opened at the Industrial Bank of Washington on June 15, 1988, in the name of Friends of Jesse Jackson Banquet Fund Raiser with Joseph Beavers, Mattie Robinson, and Horace Roberts on the signature card. Beavers states that tickets were paid for in cash and in checks, although mostly in checks. He adds that all receipts were deposited into the bank account and that this account was the only one used for the event. He provided a financial report that showed total receipts of \$10,466.44, expenses of \$5,314.00 with the balance of \$5,152.44 to be given to Rev. Jackson. The bank statements he provided cover the period from June 15 to July 31. It shows total deposits of \$10,450 and total debits of \$9,411.81 with an ending balance of \$1,038.19.

Beavers states that when Rev. Jackson was speaking to the NAACP convention at the Sheraton Park Hotel, Friends of Jesse Jackson arranged to make the contribution to him personally on the night he spoke. A check was made out to Rev. Jackson in the amount of \$5,152.44. Beavers states that after the check was presented, Rev. Jackson came to Beavers and asked that the check be changed to be made out to Keep Hope Alive for \$5,000. He said that Rev. Jackson further suggested that Beavers keep the \$152.44 balance and come to Atlanta to help him win the nomination. The reports filed by Keep Hope Alive show the receipt of the \$5,000 contribution on July 13, 1988. The bank statements show it cleared the account of Friends of Jesse Jackson on July 28, 1988.

C. Conclusion

Neither Keep Hope Alive nor Friends of Jesse Jackson has requested preprobable cause conciliation. The responses from both Keep Hope Alive and Friends of Jesse Jackson provide sufficient information regarding the subject transaction to prepare briefs on the issues raised. Therefore, this Office will proceed to the next stage of the enforcement process.

Lawrence M. Noble General Counsel

2/20/90

BY:

Lois G. Lerner

Associate General Counsel

Attachment

Date

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Staff persons: George F. Rishel

Jeffrey D. Long



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

TO:

LAWRENCE NOBLE, GENERAL COUNSEL

FROM:

MARJORIE W. EMMONS /DELORES HARRIS SECRETARY OF THE COMMISSION

DATE:

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FEBRUARY 22, 1990

SUBJECT:

MUR 2939 - COMPREHENSIVE INVESTIGATIVE REPORT

DATED FEBRUARY 20, 1990.

The above-captioned matter was received in the Commission Secretariat at 11:33 a.m. on February 21, 1990 and circulated on a 24-hour no-objection basis at 4:00 p.m. on Wednesday, February 21, 1990

There were no objections to the above-captioned matter.



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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 15, 1990

Joseph A. Beavers 3215 Park View Road Chevy Chase, Maryland 20815

Dear Mr. Beavers:

The Commission received your response dated January 26, 1990, on January 30, 1990. After reviewing your response, one point has arisen which needs further clarification. You state in the response that payments to attend the banquet were made in both cash and checks and that all were deposited into the account at the Industrial Bank of Washington. This Office needs to know whether any of the payments to Friends of Jesse Jackson were made with corporate or union checks.

Please call Jeffrey Long at (202) 376-5690 with your response, or you may respond by letter.

Sincerely,

George F. Rishel

Assistant General Counsel

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mun 2939 OGC 5886

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FRIENDS OF JESSE JACKSON
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C/C LIZ

PHONE: 202-722-2033

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08/31/88 THRU 09/30/88

PAGE 1

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C/O LIZ

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PAGE 1

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INDUSTRIAL BANK OF AMINGTON 4812 GEORGIA AVENUE WASHINGTON DC 20011 PHONE: 202-722-2033

FRIENDS OF JESSE JACKSON BANQUET FUND RAISER SEND STAT TO MINICIPAL CTR C/O LIZ

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CHECKING ACCOUNTS 350915

10/31/85 THRU 11/30/88

PAGE 1

OUR CUSTOMER SERVICE LINE 722-2031 IS OPEN FROM 9 AM TO 3 PM MONDAY - FRIDAY FOR ANY IMPURIES REGARDING YOUR CHECKING OR SAVINGS ACCOUNTS.

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90 MPR 11 PH 5-18

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

(Neep Hope Alive Political Action (Committee and Dr. Mary Berry, (Committee

GENERAL COUNSEL'S REPORT

The Office of the General Counsel is prepared to close the investigation in this matter as to Keep Hope Alive Political Action Committee and Dr. Mary Berry, as treasurer, and Friends of Jesse Jackson and Joseph Beavers, acting as treasurer, based on the assessment of the information presently available.

7/10/90 Date

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Lawrence M. Noble General Counsel

FEDERAL EL SECHETARIAT PONISION

90 APR 17 AM 11: 00

BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

COMPREHENSIVE INVESTIGATIVE REPORT #2

This Office circulated Comprehensive Investigative

Report #1 to the Commission on February 21, 1990, that included
the response from Joseph Beavers on behalf of the Friends of

Jesse Jackson. The attached response has been received from

Mr. Beavers and provides additional information for the
preparation of briefs.

Lawrence M. Noble General Counsel

4/16/90

BY:

Lois G. Lerner

Associate General Counsel

Attachment

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Staff assigned: Jeffrey Long



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM

TO:

LARRY NOBLE

GENERAL COUNSEL

FROM:

MARJORIE W. EMMONS / DELORES HARRIS

DATE:

 \circ

APRIL 19, 1990

SUBJECT:

MUR 2939 - COMPREHENSIVE INVESTIGATIVE REPORT #2

DATED APRIL 16, 1990

The above-captioned matter was received in the Commission Secretariat at 11:00 a.m. on Tuesday, April 17, 1990 and circulated on a 24-hour no-objection basis at 4:00 p.m. on Tuesday, April 17, 1990

There were no objections to the above-captioned matter.



90 APR 25 AM # 49



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

SENSITIVE

April 24, 1990

MEMORANDUM

TO:

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The Commission

FROM:

Lawrence M. Noble

General Counsel

SUBJECT:

MUR 2939

Attached for the Commission's review is a brief stating the position of the General Counsel on the legal and factual issues of the above-captioned matter. A copy of the brief and letter notifying the respondents of the General Counsel's intent to recommend to the Commission a finding of probable cause to believe with respect to Friends of Jesse Jackson and Joseph Beavers, acting as treasurer, was mailed on April 24, 1990. Following receipt of the respondents' reply to this notice, this Office will make a further report to the Commission.

Attachments

1. Brief

2. Letter to respondent

Staff persons: Jeffrey D. Long

George F. Rishel



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 24, 1990

Joseph A. Beavers, Acting Treasurer Friends of Jesse Jackson 3215 Park View Road Chevy Chase, MD 20815

RE: MUR 2939

Friends of Jesse Jackson and Joseph Beavers, acting as

treasurer

Dear Mr. Beavers:

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Based on information ascertained in the normal course of carrying out its supervisory responsibilities, on November 28, 1989, the Federal Election Commission found reason to believe that Friends of Jesse Jackson ("Committee") and you, acting as treasurer, violated 2 U.S.C. §§ 433 and 434, and instituted an investigation in this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find probable cause to believe that these violations have occurred.

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

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

Joseph A. Beavers Page 2 A finding of probable cause to believe requires that the Office of the General Counsel attempt for a period of not less than 30, but not more than 90 days, to settle this matter through a conciliation agreement. Should you have any questions, please contact Jeffrey D. Long, the staff member assigned to this matter, at (202) 376-5690. Since ely, Lawrence M. Noble General Counsel Enclosure Brief 0 4 0

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)		
Friends of Jesse Jackson	,	MUR	2939
and Joseph Beavers, acting)		
as treasurer)		

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

On November 28, 1989, the Commission found reason to believe Friends of Jesse Jackson and Joseph Beavers, acting as treasurer, violated 2 U.S.C. § 433 and 434. These findings related to the \$5,000 contribution Keep Hope Alive Political Action Committee reported receiving from Friends of Jesse Jackson on July 13, 1988.

Keep Hope Alive Political Action Committee was organized in June 1988 and filed its original Statement of Organization with the Commission on June 30, 1988. The Committee described itself as a committee that supports or opposes more than one federal candidate and not a separate segregated fund or a party committee. According to press reports, Keep Hope Alive was formed by the Rev. Jesse Jackson as a political action committee to form "the basis for his activities beyond the 1988 elections and to assist local, state, and national candidates." Keep Hope Alive has not been designated by Rev. Jackson as an authorized committee.

II. LEGAL AND FACTUAL ANALYSIS

Under the Federal Election Campaign Act of 1971, as amended ("the Act"), a "committee" is defined to include "any...group of

persons" who receive more than \$1,000 in contributions or make more than \$1,000 in expenditures during any calendar year. 2 U.S.C. § 431(4)(A). Such political committees are required to file a Statement of Organization with the Commission within 10 days of becoming a political committee and to file periodic reports of their receipts and disbursements. 2 U.S.C. §§ 433 and The Act also prohibits corporations and labor unions from making contributions and expenditures in connection with federal elections and prohibits political committees from knowingly accepting such contributions or expenditures. 2 U.S.C. § 441b. The Commission's regulations provide that organizations, which qualify as a political committee under the Act, must register with the Commission. 11 C.F.R. Part 102. Organizations qualifying as political committees must establish a campaign depository into which, with limited exceptions, all receipts are deposited and from which all disbursements are made. 2 U.S.C. § 432(h). This depository may be a separate account for federal activity into which are deposited only funds subject to the limitations and prohibitions of the Act. 11 C.F.R. § 102.5(a).

In the early spring of 1988 Pastor Henry C. Gregory of the Shiloh Baptist Church and Joseph Beavers, a member of the church, discussed the desirability of holding a fundraiser on behalf of the candidacy of Rev. Jackson for the Democratic Party's presidential nomination. At the suggestion of Rev. Gregory, Joseph Beavers along with two other members of the church, Mattie Robinson and Horace Roberts, began organizing a fundraiser on behalf of the Rev. Jesse Jackson's candidacy. Beavers became the

chairman of the fundraiser, and Mattie Robinson and Horace
Roberts became co-chairs. The proceeds after expenses from the
fundraiser were intended to help Rev. Jackson win the nomination.

The group first organized a committee with the name of "Friends of Jesse Jackson." Its honorary chairpersons were Mayor Marion S. Barry, Jr., the Honorable Walter E. Fauntroy, and Rev. Henry C. Gregory. Several District of Columbia city council members were enlisted as supporters and a number of other persons as friends. The group advertised the fundraiser with flyers and invitations. According to Beavers, a mailing was made to members of the Shiloh Baptist Church.

One flyer listed the honorary chairpersons, the council supporters, and the dinner committee and described the event as a "Fundraiser for Jesse Jackson" to be held at the Shiloh Family Life Center on Monday, June 20, 1988. The contributor information card described the event as "Jesse Jackson--88--For President." It noted a ticket cost of \$50 per person or \$500 for a table of ten. Checks were to be made payable to "Friends of Jesse Jackson Banquet Fundraiser." The group also prepared letterhead stationery that listed the honorary chairpersons, council supporters, and dinner committee. Another flyer advertised the event as a "Fundraiser to Help Jesse Win at the Democratic National Convention in Atlanta, GA." It stated that the "Friends of Jesse Jackson Invite You to Attend a Reception and Dinner." Mayor Marion S. Barry, Jr., was listed as the quest speaker. The flyer also stated "The Atlanta Democratic Convention A Critical Crossroads in Our Nation's History."

An account was opened at the Industrial Bank of Washington on June 15, 1988, in the name of Friends of Jesse Jackson Banquet Fund Raiser with Joseph Beavers, Mattie Robinson, and Horace Roberts on the signature card. Tickets were paid for in cash and in checks, although mostly in checks. A financial report prepared by the chairman and co-chairs indicates that a total of \$10,466.44 was received as receipts by the Friends of Jesse Jackson for this fundraiser event. The report indicated these disbursements:

Printing	\$857.65
Postage, Posters, etc.	589.19
Champagne, etc.	410.88
Flowers	52.50
Dinner, etc.	2,833.78
Soloists and Organist	250.00
Secretary	150.00
Returned checks	170.00
Total	\$5,314.00

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This left a balance of \$5,152.44 to be given to Rev. Jackson or his presidential campaign. The bank statements covering the period from June 15 to November 30 show total deposits of \$10,675 and total debits of \$10,532.71 with an ending balance of

^{1.} The payment for postage apparently relates to the mailing to the members of the church. The Act provides that any communication, which solicits funds or expressly advocates the election or defeat of a clearly identified candidate for federal office and which is distributed by direct mail or any other type of general public political advertising, shall carry a disclaimer stating who paid for the communication and whether it was authorized by any candidate. 2 U.S.C. § 441d. The financial report, however, does not indicate any payments to commercial vendors regarding the distribution of flyers or payments for a commercial mailing list. According to Beavers, a mailing was made to members of the church. Thus, such a mailing to church members would not appear to be direct mail for purposes of the disclaimer provision. Therefore, no recommendation is made with regard to 2 U.S.C. § 441d.

\$142.29. Thus, all of the receipts were apparently deposited into the bank account at the Industrial Bank of Washington.

Friends of Jesse Jackson established no other bank account.

Beavers states that it has since been closed out.

Arrangements were made to present the contribution check to Rev. Jackson personally on the night he spoke to the NAACP convention at the Sheraton Park Hotel in July 1988. A check was made out to Rev. Jackson or his campaign in the amount of \$5,152.44. After the check was presented, Rev. Jackson reportedly came to Beavers and asked that the check be changed to be made out to Keep Hope Alive for \$5,000. The reports filed by

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^{2.} The differences between the financial report and the bank statements are relatively minor and appear to be related to the late payments for a few tickets or returns of deposits.

^{3.} At the time this check was drafted, Friends of Jesse Jackson had not qualified as a multicandidate political committee as defined at 2 U.S.C. § 441a(a)(4). Therefore, it could have legally contributed only \$1,000 to the Jackson campaign unless it was another authorized committee raising funds for the Jackson campaign. As previously noted, Rev. Jackson never designated Friends of Jesse Jackson as an authorized committee, nor is there any evidence his campaign was involved in the Friends of Jesse Jackson fundraising event. Friends of Jesse Jackson could, however, contribute up to \$5,000 per calendar year to Keep Hope Alive pursuant to 2 U.S.C. § 441a(a)(1)(C), because Keep Hope Alive was not an authorized committee.

^{4.} Rev. Jackson also apparently suggested to Joseph Beavers that he keep the \$152.44 balance and use it to come to Atlanta and help Rev. Jackson win the nomination. Although that is how the \$152.44 balance was apparently used, it would not have necessarily resulted in any violation of the Act. There is no provision that precludes this balance from being paid to Beavers personally. Section 439a limits the conversion to personal use of the funds of only a principal campaign committee. Friends of Jesse Jackson is not a principal campaign committee of any candidate and was not an authorized committee of Rev. Jackson. Furthermore, Rev. Jackson's prompt return of the contribution from Friends of Jesse Jackson demonstrates that it was never accepted by Rev. Jackson's principal campaign committee.

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Keep Hope Alive reported the receipt of the \$5,000 contribution on July 13, 1988, as from a political committee. The bank statements show it cleared the account of Friends of Jesse Jackson on July 28, 1988.

These facts demonstrate that Friends of Jesse Jackson was a group of persons who received an aggregate of more than \$1,000 in contributions in calendar year 1988 and made an aggregate of more than \$1,000 in expenditures in calendar year 1988 for the purpose of influencing a federal election. In fact, Friends of Jesse Jackson received more than \$10,000 in contributions for the purpose of influencing the nomination of Rev. Jesse Jackson as the Democratic Party's candidate for President of the United States and expended \$5,314 in raising these funds. When its contribution check to Rev. Jackson was returned, Friends of Jesse Jackson then contributed \$5,000 to Keep Hope Alive Political Action Committee, a federal political committee registered with the Commission. Thus, Friends of Jesse Jackson became a political committee under the Act. See 2 U.S.C. § 431(4)(A).

⁽Footnote 4 continued from previous page)
Moreover, pursuant to 2 U.S.C. § 431(8)(B)(iv), Beavers' use of
the \$152.44 balance as his personal funds would not have been a
contribution to Rev. Jackson's campaign.

^{5.} The Act also provides that an unauthorized committee may not include the name of any candidate in the name of the committee. 2 U.S.C. § 432(e)(4). Friends of Jesse Jackson was not designated by Rev. Jackson as an authorized committee. Thus, it would have been precluded from using Rev. Jackson's name in its name. Nevertheless, because it had not registered and reported as a political committee at that time, it does not appear that this section has been implicated. Therefore, no recommendation is made with respect to 2 U.S.C. § 432(e)(4).





reports of its receipts and disbursements in accordance with the Act and regulations pursuant to 2 U.S.C. §§ 433 and 434.

Moreover, the facts demonstrate that Friends of Jesse Jackson, as an unauthorized political committee, was not a designated fundraising agent for either Keep Hope Alive or the Jackson campaign.

The District of Columbia prohibits corporate, but not union, contributions. Beavers has stated in a conversation with the General Counsel's staff that solicitations were sent to two unions that he previously belonged to: the Hotel and Restaurant Employees Local 25 and the Greater Washington Central Labor Council. He indicated these two unions usually purchase two tickets each. The costs of two tickets each for both unions would have totaled \$200. Thus, it remains possible that the \$10,466.44 in funds received by Friends of Jesse Jackson included up to \$200 in union treasury funds. Beavers did not retain copies of the checks received to verify whether or not union funds had been received. In light of the amount possibly involved and the absence of readily available records to check whether union funds were received, no recommendation is made with respect to 2 U.S.C. § 441b(a).

Accordingly, the General Counsel recommends that the Commission find probable cause to believe Friends of Jesse Jackson and Joseph Beavers, acting as treasurer, violated 2 U.S.C. §§ 433 and 434 for failure to register and report as a political committee.

III. GENERAL COUNSEL'S RECOMMENDATIONS

Find probable cause to believe that Friends of Jesse Jackson and Joseph Beavers, acting as treasurer, violated 2 U.S.C. §§ 433 and 434.

7/3/90 Date

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Lawrence M. Noble General Counsel

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT

BEFORE THE FEDERAL ELECTION COMMISSION 90 APR 30 AM 11:41

In the Matter of

Keep Hope Alive Political Action Committee and Dr. Mary Berry, as treasurer

MUR 2939

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

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On August 22, 1989, the Commission found reason to believe Keep Hope Alive Political Action Committee ("the Committee") and its treasurer ("the Respondents") had violated 2 U.S.C. § 441b and 11 C.F.R. § 102.5(a). These findings related to the Committee's receipt of \$5,850 in funds from four unregistered organizations.

Keep Hope Alive Political Action Committee was organized in June 1988 and filed its original Statement of Organization with the Commission on June 30, 1988. The Committee described itself as a committee that supports or opposes more than one federal candidate and not a separate segregated fund or a party committee. According to press reports, Keep Hope Alive was formed by the Rev. Jesse Jackson as a political action committee to form "the basis for his activities beyond the 1988 elections and to assist local, state, and national candidates." Keep Hope

^{1.} The initial findings in this matter identified Cirilio A. McSween, as treasurer. The General Counsel later discovered that on June 27, 1989, the Committee had filed a new Statement of Organization identifying Dr. Mary Berry as the treasurer. In accordance with Commission policy, Dr. Mary Berry has been substituted as treasurer in this matter. Alvin J. Boutte of Chicago was the original treasurer and the treasurer of record at the time of the events in question in this matter.

Alive has not been designated by Rev. Jackson as an authorized committee. At the time of the events that are the subject of this matter, Keep Hope Alive had not yet qualified as a multicandidate political committee as defined at 2 U.S.C.

§ 441a(a)(4). For 1988, the Committee reported total receipts of \$223,481 and total disbursements of \$77,486. Through 1989, the Committee disclosed total receipts of \$337,775 and total disbursements of \$436,587 with cash on hand of \$47,234 and debts owed by the Committee of \$9,031. It was originally located in Chicago, but later moved to Washington, D.C.

II. LEGAL AND FACTUAL ANALYSIS

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The Federal Election Campaign Act of 1971, as amended ("the Act"), prohibits corporations and labor unions from making contributions and expenditures in connection with federal elections and prohibits political committees from knowingly accepting such contributions or expenditures. 2 U.S.C. § 441b. Organizations qualifying as political committees may establish a separate account for federal activity into which are deposited only funds subject to the limitations and prohibitions of the Act. 11 C.F.R. § 102.5(a). Commission regulations further provide that the treasurer of a political committee shall be responsible for ascertaining the legality of all contributions. 11 C.F.R. § 103.3(b).

As noted, the findings in this matter relate to the Committee's receipt of \$5,850 in funds from four unregistered

organizations as follows: 2

Organization	Date	Amount
Friends of Jesse Jackson Washington, D.C.	7-13-88	\$5,000.00
John Wiley Price Campaign Dallas, Texas	7-9-88	250.00
Committee to Elect Rev. A.R. Polk River Rouge, Michigan	7-10-88	500.00
Mid-Brooklyn Political Association	9-15-88	100.00

With respect to the \$250 contribution from the John Wiley
Price Campaign, counsel for the Respondent states that Mr. Price,
a county commissioner in Dallas, wrote the check from his
campaign fund. Counsel further states that "[w]e have spoken
with Mr. Price, and he has stated that there was at that time no
corporate or labor money in his campaign account, nor did his
campaign receive any personal contributions greater than \$5000."
Texas law prohibits corporate and labor union contributions.

Regarding the \$100 contribution from Mid-Brooklyn Political Association, counsel states that James Connolly, district leader of the 42nd State Assembly District in New York, signed a check for \$100 from the Mid-Brooklyn Political Association, which is described as "an account opened for the purpose of impacting local races in Brooklyn." Counsel further states that "Mr. Connolly has informed us that the account contained no corporate or union money and no individual contributions of more than

^{2.} The amounts of these contributions are within the contribution limitations of 2 U.S.C. § 441a(a).

\$5000." New York law permits limited corporate contributions and unlimited union contributions.

Counsel was not able to provide information relating to the Committee to Elect Rev. A.R. Polk. Instead, the General Counsel contacted Rev. A.R. Polk, who stated that the committee was formed for an election within the church, not a political office. Although he said he did not recall making a contribution to Keep Hope Alive PAC, he did acknowledge that such a contribution may have been made during a meeting in Texas. He further stated that the funds in the committee's accounts did not come from corporations or unions but from members of the church.

With regard to the \$5,000 contribution from Friends of Jesse Jackson, the General Counsel has learned that in the early spring of 1988 Pastor Henry C. Gregory of the Shiloh Baptist Church and Joseph Beavers, a member of the church, discussed the desirability of holding a fundraiser on behalf of the candidacy of Rev. Jackson for the Democratic Party's presidential nomination. At the suggestion of Rev. Gregory, Joseph Beavers along with two other members of the church, Mattie Robinson and Horace Roberts, began organizing a fundraiser on behalf of Rev. Jesse Jackson's candidacy. Beavers became the chairman of the fundraiser, and Mattie Robinson and Horace Roberts became co-chairs. The proceeds after expenses from the fundraiser were intended to help Rev. Jackson win the nomination.

The group first organized a committee with the name of "Friends of Jesse Jackson." Its honorary chairpersons were Mayor Marion S. Barry, Jr., the Honorable Walter E. Fauntroy, and Rev.

Henry C. Gregory. Several District of Columbia city council members were enlisted as supporters and a number of other persons as friends. The group advertised the fundraiser with flyers and invitations. According to Beavers, a mailing was made to members of the Shiloh Baptist Church.

One flyer listed the honorary chairpersons, the council supporters, and the dinner committee and described the event as a "Fundraiser for Jesse Jackson" to be held at the Shiloh Family Life Center on Monday, June 20, 1988. The contributor information card described the event as "Jesse Jackson--88--For President." It noted a ticket cost of \$50 per person or \$500 for a table of ten. Checks were to be made payable to "Friends of Jesse Jackson Banquet Fundraiser." The group also prepared letterhead stationery that listed the honorary chairpersons, council supporters, and dinner committee. Another flyer advertised the event as a "Fundraiser to Help Jesse Win at the Democratic National Convention in Atlanta, GA." It stated that the "Friends of Jesse Jackson Invite You to Attend a Reception and Dinner." Mayor Marion S. Barry, Jr., was listed as the guest speaker. The flyer also stated "The Atlanta Democratic Convention A Critical Crossroads in Our Nation's History."

An account was opened at the Industrial Bank of Washington on June 15, 1988, in the name of Friends of Jesse Jackson Banquet Fund Raiser with Joseph Beavers, Mattie Robinson, and Horace Roberts on the signature card. Tickets were paid for in cash and in checks, although mostly in checks. A financial report prepared by the chairman and co-chairs indicates that a total of

\$10,466.44 was received as receipts by the Friends of Jesse Jackson for this fundraiser event. The report indicated these disbursements:

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Secretary	150.00
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Total	\$5,314.00

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This left a balance of \$5,152.44 to be given to Rev. Jackson or his presidential campaign. The bank statements covering the period from June 15 to November 30 show total deposits of \$10,675 and total debits of \$10,532.71 with an ending balance of \$142.29. Thus, all of the receipts were apparently deposited into the bank account at the Industrial Bank of Washington. Friends of Jesse Jackson established no other bank account. Beavers states that it has since been closed out.

Arrangements were made to present the contribution check to Rev. Jackson personally on the night he spoke to the NAACP convention at the Sheraton Park Hotel in July 1988. A check was made out to Rev. Jackson in the amount of \$5,152.44. After the

^{3.} The differences between the financial report and the bank statements are relatively minor and appear to be related to the late payments for a few tickets or returns of deposits.

^{4.} At the time this check was drafted, Friends of Jesse Jackson had not qualified as a multicandidate political committee as defined at 2 U.S.C. § 441a(a)(4). Therefore, it could have legally contributed only \$1,000 to the Jackson campaign unless it was another authorized committee raising funds for the Jackson campaign. As previously noted, Rev. Jackson never designated Friends of Jesse Jackson as an authorized committee, nor is there any evidence his campaign was involved in the Friends of Jesse

check was presented, Rev. Jackson reportedly came to Beavers and asked that the check be changed to be made out to Keep Hope Alive for \$5,000. The reports filed by Keep Hope Alive reported the receipt of the \$5,000 contribution on July 13, 1988, as from a political committee. The bank statements show it cleared the account of Friends of Jesse Jackson on July 28, 1988. These facts demonstrate that Friends of Jesse Jackson was organized and operating as an unauthorized political committee and not as a designated fundraising agent for Keep Hope Alive or the Jackson campaign. Thus, Keep Hope Alive's reporting of this contribution as from a political committee was correct.

The District of Columbia prohibits corporate, but not union, contributions. Beavers has stated in a conversation with the

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⁽Footnote 4 continued from previous page)
Jackson fundraising event. Friends of Jesse Jackson could,
however, contribute up to \$5,000 per calendar year to Keep Hope
Alive pursuant to 2 U.S.C. § 441a(a)(1)(C).

These facts demonstrate that the contribution from Friends of Jesse Jackson, a political committee, to Keep Hope Alive should not also be attributed to Rev. Jackson's presidential campaign committee. Under the Act, Rev. Jackson is deemed an agent of his committee for the purpose, among others, of receiving contributions. 2 U.S.C. § 432(e)(2). Commission regulations also provide that a contribution that is "returned" to the contributor within 10 days of its receipt is not deemed to have been accepted by the committee for the purposes of the Act. 11 C.F.R. § 103.3(b)(1). Rev. Jackson returned the check for the Friends of Jesse Jackson contribution on the same day he Thus, although the funds making up the contribution were raised for the purpose of furthering Rev. Jackson's presidential campaign, his actions in returning the contributions demonstrate, pursuant to 11 C.F.R. § 103.3(b)(1), that this contribution was not accepted by Rev. Jackson's committee. Instead, apparently at Rev. Jackson's suggestion, a new check was written and made payable to Keep Hope Alive. At that point, with the check being returned, Friends of Jesse Jackson was free to follow Rev. Jackson's suggestion and make a contribution to Keep Hope Alive without any consequences to Rev. Jackson's campaign.

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General Counsel's staff that solicitations were sent to two unions that he previously belonged to: the Hotel and Restaurant Employees Local 25 and the Greater Washington Central Labor Council. He indicated these two unions usually purchase two tickets each. The costs of two tickets each for both unions would have totaled \$200. Thus, it remains possible that the \$10,466.44 in funds received by Friends of Jesse Jackson included up to \$200 in union treasury funds. Beavers did not retain copies of the checks received to verify whether or not union funds had been received. In light of the amount possibly involved and the absence of readily available records to check whether union funds were received, this Office recommends that no further action be taken regarding the receipt and deposit of this contribution as well as the others.

Accordingly, the General Counsel recommends that the Commission take no further action with respect to Keep Hope Alive Political Action Committee and Dr. Mary Berry, as treasurer, regarding the alleged violations of 2 U.S.C. § 441b and 11 C.F.R. § 102.5(a).

III. RECOMMENDATIONS

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- 1. Take no further action against Keep Hope Alive Political Action Committee and Dr. Mary Berry, as treasurer, with respect to 2 U.S.C. § 441b and 11 C.F.R. § 102.5(a).
- 2. Close the file as it pertains to these respondents.

^{6.} A brief recommending a finding of probable cause to believe Friends of Jesse Jackson and Joseph Beavers, acting as treasurer, failed to register and report as a political committee is being sent to these respondents.

3. Approve the attached letter.

Lawrence M. Noble General Counsel

4/27/90 Date

BY:

Lois G. Lerner Associate General Counsel

Attachment

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1. Letter to respondents

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

Keep Hope Alive Political Action) MUR 2939

Committee and Dr. Mary Berry,)
as treasurer)

CERTIFICATION

- I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do herby certify that on May 2, 1990, the Commission decided by a vote of 4-0 to take the following actions in MUR 2939:
 - Take no further action against Keep Hope Alive Political Action Committee and Dr. Mary Berry, as treasurer, with respect to 2 U.S.C. § 441b and 11 C.F.R. § 102.5(a), as recommended in the General Counsel's Report dated April 27, 1990.
 - 2. Close the file as it pertains to these respondents.

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

Attest:

5-3-90 Date

Marjorie W. Emmons Secretary of the Commission

Received in the Secretariat: Mon., April 30, 1990 11:41 a.m. Circulated to the Commission: Mon., April 30, 1990 4:00 p.m. Deadline for vote: Wed., May 2, 1990 4:00 p.m.

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 4, 1990

Katharine R. Boyce, Esquire Patton, Boggs & Blow 2550 M Street, N.W. Washington, D.C. 20037-1350

> RE: MUR 2939

> > Keep Hope Alive and Dr. Mary

Berry, as treasurer

Dear Ms. Boyce:

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On September 12, 1989, your clients, were notified that the Federal Election Commission found reason to believe that they had violated 2 U.S.C. § 441b and 11 C.F.R. § 102.5(a). On October 17, 1989, you submitted a response to the Commission's reason to believe findings.

After considering the circumstances of the matter, the Commission determined on May 3 , 1990, to take no further action against your clients, and closed the file as it pertains to them. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

The Commission reminds you that accepting contributions from unregistered organizations appears to be a violation of 2 U.S.C. § 441b and 11 C.F.R. § 102.5(a). Your clients should take immediate steps to insure that accepting such contributions do not result in the acceptance of prohibited funds in the future.

Katharine R. Boyce Page 2 If you have any questions, please contact Jeffrey D. Long, the staff member assigned to this matter, at (202) 376-5690. Sincerely, Lawrence M. Noble General Counsel BY: Lois G. Lerner Associate General Counsel \circ 4



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 11, 1990

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Joseph A. Beavers, Acting Treasurer Friends of Jesse Jackson 3215 Park View Road Chevy Chase, Maryland 20815

> RE: MUR 2939 Friends of Jesse Jackson and Joseph Beavers, as acting treasurer

Dear Mr. Beavers:

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On April 24, 1990, you were mailed a brief stating the position of the General Counsel on the legal and factual issues in this matter under review. This brief and accompanying letter notified you of the General Counsel's intent to recommend to the Commission a finding of probable cause to believe Friends of Jesse Jackson, and you as acting treasurer violated 2 U.S.C. §§ 433 and 434.

To date, you have not responded to the General Counsel's brief. Unless we receive a response from you within 15 days of your receipt of this letter, this Office will circulate a report to the Commission recommending a finding of probable cause. You should submit 10 copies of your response to the Secretary of the Commission, and forward 3 copies to the Office of the General Counsel.

Should you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble General Counsel

BY: Lois G. Lerner

Associate General Counsel

FEDERAL CLEATION COMMISSION

90 AUG 22 AM ||: 42 BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE
SEP 1 8 1990
EXECUTIVE SESSION

In the Matter of)

MUR 2939

Friends of Jesse Jackson)

and Joseph Beavers, acting)

as treasurer)

GENERAL COUNSEL'S REPORT

I. BACKGROUND

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This matter was initiated by a referral on April 26, 1989, from the Reports Analysis Division involving a multicandidate political committee, Keep Hope Alive. On August 22, 1989, the Commission found reason to believe Keep Hope Alive and its treasurer had violated 2 U.S.C. § 441b and 11 C.F.R. § 102.5(a)(1) and initiated an investigation. On the basis of information obtained in response to the investigation, the Commission on November 28, 1989, found reason to believe Friends of Jesse Jackson and Joseph Beavers, acting as treasurer, violated 2 U.S.C. §§ 433 and 434. On May 2, 1990, the Commission decided to take no further action with respect to Keep Hope Alive and its treasurer and close the file as it pertains to that respondent.

On April 24, 1990, this Office sent the General Counsel's Brief to Joseph Beavers, recommending that the Commission find probable cause to believe Friends of Jesse Jackson and Joseph Beavers, acting as treasurer, violated 2 U.S.C. §§ 433 and 434. No response has been received to date.

II. ANALYSIS

This Office incorporates the General Counsel's Brief, signed April 23, 1990, into this report as the factual and legal

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

IV. RECOMMENDATIONS

- Find probable cause to believe that Friends of Jesse Jackson and Joseph Beavers, acting as treasurer, violated 2 U.S.C. §§ 433 and 434.
- 2. Approve the attached conciliation agreement and appropriate letter.

Date

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8/21/90

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Lawrence M. Noble General Counsel

Attachment

Conciliation Agreement

Staff assigned: George F. Rishel

Jeffrey D. Long

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

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MUR 2939

Friends of Jesse Jackson and Joseph Beavers, acting as treasurer.

CERTIFICATION

I, Marjorie W. Emmons, recording secretary of the Federal Election Commission executive session on September 20, 1990, do hereby certify that the Commission decided by a vote of 4-0 to take the following actions in MUR 2939:

- 1. Find probable cause to believe that Friends of Jesse Jackson and Joseph Beavers, acting as treasurer, violated 2 U.S.C. §§ 433 and 434.
- 2. Approve the conciliation agreement attached to the General Counsel's report dated August 21, 1990, and an appropriate letter as recommended in the General Counsel's report.

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

Attest:

9-20-90 Date

Secretary of the Commission



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FEDERAL ELECTION COMMISSION

WASHINGTON D.C. 20463

September 27, 1990

Joseph A. Beavers Friends of Jesse Jackson 3215 Park View Road Chevy Chase, Maryland 20815

> RE: MUR 2939 Friends of Jesse Jackson and Joseph Beavers, acting as treasurer

Dear Mr. Beavers:

On September 20, 1990, the Federal Election Commission found that there is probable cause to believe Friends of Jesse Jackson and you, acting as treasurer, violated 2 U.S.C. §§ 433 and 434, provisions of the Federal Election Campaign Act of 1971, as amended.

The Commission has a duty to attempt to correct such violations for a period of 30 to 90 days by informal methods of conference, conciliation, and persuasion, and by entering into a conciliation agreement with a respondent. If we are unable to reach an agreement during that period, the Commission may institute a civil suit in United States District Court and seek payment of a civil penalty.

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 within ten days. I will then recommend that the Commission accept the agreement. Please make your check for the civil penalty payable to the Federal Election Commission.

If you have any questions or suggestions for changes in the enclosed conciliation agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Rece M. Not Sold Lawrence M. Noble

General Counsel

Enclosure Conciliation Agreement



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BEFORE THE FEDERAL ELECTION COMMISSION

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In the Matter of)	
	MUR 2939
Friends of Jesse Jackson)	
and Joseph Beavers, acting	
as treasurer)	

GENERAL COUNSEL'S REPORT

I. BACKGROUND

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This matter was initiated by a referral on April 26, 1989, from the Reports Analysis Division involving a multicandidate political committee, Keep Hope Alive. On August 22, 1989, the Commission found reason to believe Keep Hope Alive and its treasurer had violated 2 U.S.C. § 441b and 11 C.F.R. § 102.5(a)(1) and initiated an investigation. The findings were based on the reported receipt of a \$5,000 contribution from an unregistered organization called Friends of Jesse Jackson. the basis of information obtained in response to the investigation, the Commission on November 28, 1989, found reason to believe Friends of Jesse Jackson and Joseph Beavers, acting as treasurer, violated 2 U.S.C. §§ 433 and 434. The response from Keep Hope Alive had identified Joseph Beavers as the person who had knowledge of the Friends of Jesse Jackson activity. On May 2, 1990, the Commission decided to take no further action with respect to Keep Hope Alive and its treasurer and to close the file as it pertains to that respondent.

On April 24, 1990, this Office sent the General Counsel's Brief to Joseph Beavers, recommending that the Commission find probable cause to believe Friends of Jesse Jackson and Joseph Beavers, acting as treasurer, violated 2 U.S.C. §§ 433 and 434.

II. DISCUSSION

434.

After repeated attempts by telephone and letter to elicit a response from Mr. Beavers, he sent a letter that was received on January 16, 1991. (Attachment 1). In telephone conversations he had indicated that he would contact Keep Hope Alive and ask it to handle this matter. Keep Hope Alive has not contacted this Office with regard to Mr. Beavers' request.

In his letter Mr. Beavers notes that he was startled that Keep Hope Alive personnel had not contacted us and resolved this matter. He says that he feels that Reverend Jackson was wrong in asking them to make the check payable to Keep Hope Alive and that Keep Hope Alive should take responsibility for any violations. He denies that he ever acted as treasurer of Friends of Jesse Jackson or that it had a treasurer. He says he was one of three co-chairmen of the event along with the late Rev. Henry C. Gregory, III. All four of them authorized the bills to be paid and made joint decisions on all matters pertaining to the fundraiser.

He notes that he has cooperated with the Commission in its investigation in this matter and has supplied us with copies of all bank statements and other pertinent information which enabled

 \bigcirc 4 Taking into account the facts and circumstances of this matter and the points raised in Mr. Beavers' letter, this Office does not believe that filing a civil suit would be advisable in this matter. Mr. Beavers' points about the treasurer question and his voluntarily providing full information to the Commission as part of its investigation are well taken. Furthermore, considering his current situation, we do not feel holding him financially responsible is warranted.

Therefore, we recommend that the Commission take no further action with respect to Friends of Jesse Jackson and Joseph Beavers, acting as treasurer, and to close the file in this matter. The attached letter contains admonitory language. Although the file has previously been closed with respect to Keep Hope Alive, we recommend that the Commission send the attached letter to it. The letter notes that the file has been closed but also includes admonitory language. This language points out that when the committee accepts contributions from unregistered groups or from fundraising events such as the one involved here, such

Federal Election Campaign Act of 1971, as amended ("the Act"), on such groups, requiring them to register and report and abide by the other requirements of the Act. The letter then points out that in such circumstances, Keep Hope Alive should deposit such contributions in a nonfederal account or designate the group as a fundraising agent of Keep Hope Alive, in which case it must report and itemize the group's receipts and disbursements as its own and amend its Statement of Organization to add any bank accounts used by the fundraising group as an additional campaign depository.

III. RECOMMENDATIONS

- 1. Take no further action with respect to Friends of Jesse Jackson and Joseph Beavers, acting as treasurer.
- Close the file. 2.
- 3. Approve the attached letters.

Lawrence M. Noble General Counsel

Associate General Counsel

Attachments

- 1. Beavers letter
- 2. Proposed letters

Staff Persons: George F. Rishel Jeffrey D. Long



FEDERAL ELECTION COMMISSION

WASHINGTON DC 20461

MEMO	 	U/OI

TO.	_

LAWRENCE M. NOBLE

GENERAL COUNSEL

FROM:

MARJORIE W. EMMONS/DELORES HARRISY

COMMISSION SECRETARY

DATE:

JANUARY 29, 1991

SUBJECT:

MUR 2939 - GENERAL COUNSEL'S REPORT

DATED JANUARY 23, 1991

The above-captioned document was circulated to the Commission on Thursday, January 24, 1991 at 4:00 p.m.

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

Commissioner Aikens	XXX
Commissioner Elliott	
Commissioner Josefiak	xxx
Commissioner McDonald	
Commissioner McGarry	
Commissioner Thomas	

	This	matter	will	be	pla	ced	on	the	meeting	agenda
for_	TU	ESDAY,	FEBRUZ	ARY	5,	199	1			

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

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of) MUR 2939
Friends of Jesse Jackson) and Joseph Beavers, acting) as treasurer)

CERTIFICATION

I, Hilda Arnold, recording secretary for the Federal Election Commission executive session on February 5, 1991, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions with respect to MUR 2939:

- Take no further action with respect to Friends of Jesse Jackson and Joseph Beavers, acting as treasurer.
- Close the file as recommended in the January 23, 1991 General Counsel's Report.
- 3. Approve the letters, subject to the amendment of the letter to Katherine R. Boyce, Esquire, as discussed at the meeting.

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

Attest:

February 7, 1991

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Hilda Arnold

Administrative Assistant



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

February 12, 1991

Ratherine R. Boyce, Esquire Patton, Boggs & Blow 2550 M Street, N.W. Washington, D.C. 20037-1350

RE: MUR 2939

Keep Hope Alive and Dr. Mary

Berry, as treasurer

Dear Ms. Boyce:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

You are reminded that when Keep Hope Alive accepts contributions from unregistered organizations or fundraising groups, obligations may be imposed on the groups contributing such funds to register and report as political committees under the Federal Election Campaign Act of 1971, as amended, ("the Act") if the contributions exceed an aggregate of more than \$1,000 in any calendar year. To avoid imposing such obligations on groups that are not on-going political organizations or do not intend to become federal political committees, Keep Hope Alive should either (1) deposit such contributions in a nonfederal account, to be used solely for nonfederal activity, or (2) designate the group as a fundraising agent of Keep Hope Alive. If the group is designated as a fundraising agent, Keep Hope Alive is responsible for reporting all receipts and disbursements by the fundraising group as its own financial activity and for amending its Statement of Organization to list all bank accounts used by the fundraising group as additional campaign depositories of Keep Hope Alive. Such designation and reporting should occur in the same reporting period as the fundraising event or activity. . Keep Hope Alive should take steps to insure that the problems that arose with regard to the contribution from Friends of Jesse Jackson do not occur in the future.

Ratherine R. Boyce, Esquire Page 2 Should you have any questions, contact Jeffrey D. Long, the staff member assigned to this matter, at (202) 376-5690. Sincerely, Lawrence M. Noble General Counsel BY: Lois G. Lerner Associate General Counsel 0 3 ~ ` \circ 4



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

February 19, 1991

CORRECTED COPY

Joseph A. Beavers, Acting Treasurer Friends of Jesse Jackson 3215 Parkview Road Chevy Chase, Maryland 20815

RE: MUR 2939

Friends of Jesse Jackson and Joseph Beavers, acting as

treasurer

Dear Mr. Beavers:

On September 20, 1990, you were notified that the Federal Election Commission found probable cause to believe that Friends of Jesse Jackson and you, acting as treasurer, violated 2 U.S.C. §§ 433 and 434. On January 16, 1991, you submitted a response to the Commission's probable cause to believe findings.

After considering the circumstances of the matter, the Commission determined on February 5, 1991, to take no further action against Friends of Jesse Jackson and you, acting as treasurer, and closed the file in this matter. The file will be made part of the public record within 30 days. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

The Commission reminds you that raising more than \$1,000 for purposes of influencing a federal election in any calendar year or making expenditures, including contributions to federal political committees, of more than \$1,000 in any calendar year for the purpose of influencing any federal election qualifies any group of persons as a political committee under the Federal Election Campaign Act of 1971, as amended ("the Act"). For such a group to fail to register and report with the Commission as a political committee is a violation of 2 U.S.C. §§ 433 and 434. You should take immediate steps to insure that this activity does not occur in the future.

Joseph Beavers Page 2 If you have any questions, please contact Jeffrey D. Long, the staff member assigned to this matter, at (202) 376-5690. Sincerely, Lawrence M. Noble General Counsel Lerner Associate General Counsel 0 0



FEDERAL ELECTION COMMISSION WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2939

DATE FILMED 3/8/9/ CAMERA NO. 4

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