



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 3495

DATE FILMED 8-30-94 CAMERA NO. 2

CAMERAMAN JMN

24043562344

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: October 17, 1991

ANALYST: Emily Leonard

I. COMMITTEE: Simon for Senate
(C00168807)
Edward T. Joyce, Treasurer
3 West Old State Capitol Plaza, Suite 203
Springfield, IL 62701

II. RELEVANT STATUTE: 2 U.S.C. §434(a)(6)
11 CFR §104.5(f)

III. BACKGROUND:

Failure to File Forty-Eight Hour Notifications

The Simon for Senate committee ("the Committee") has failed to file the required Forty-Eight (48) Hour Notifications ("48-Hour Notices") for twenty-one (21) contributions totalling \$37,000 received prior to the 1990 General Election.

The candidate was involved in the 1990 General Election held on November 6, 1990. Prior Notice was sent to the Committee on October 1, 1990 (Attachment 2). The Notice includes a section titled "Last-Minute Contributions". This section reads "Committees must also file special notices if contributions of \$1,000 or more are received during the period of October 18 through November 3, 1990. The notices must reach the appropriate Federal and State offices within 48 hours of the committee's receipt of the contributions."

Schedule A of the 1990 30 Day Post-General Report indicates that the Committee failed to file twenty-one (21) 48-Hour Notices for contributions received during the aforementioned period (Attachment 3). The following is a list of the contributions for which no 48-Hour Notices were filed:

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SIMON FOR SENATE
REPORTS ANALYSIS OGC REFERRAL
PAGE 2

<u>Contributor Name</u>	<u>Date</u>	<u>Amount</u>
Donna E. Barrows	11/02/90	\$1,000
Sheldon Baskin	11/02/90	\$1,000
John P. Callahan	11/02/90	\$1,000
Jae Chul Chang	10/19/90	\$2,000 ^{1/}
John A. Girardi	10/24/90	\$1,000 ^{1/}
Joan W. Harris	11/02/90	\$1,000
Jim Z. Lue	11/02/90	\$1,000 ^{2/}
Paul M. Lurie	10/19/90	\$ 500 ^{2/}
Stuart G. Moldaw	11/02/90	\$1,000
Robert M. O'Toole	11/02/90	\$1,000 ^{3/}
Thomas H. Stone	10/19/90	\$1,000 ^{3/}
ANA-PAC	11/02/90	\$3,000
Human Rights Campaign Fund	11/02/90	\$2,500
Political Action Committee		
Illinois Power Federal	11/02/90	\$1,500
Political Action Committee		
Illinois Sane/Freeze Political	11/02/90	\$3,500
Action Committee		
National Education Association	11/02/90	\$5,000
Political Action Committee		
OXYPAC	10/29/90	\$5,000
Religion & Tolerance Political	11/02/90	\$1,000
Action Committee		
Russo for Congress Committee	11/02/90	\$1,000
San Diego Community Political	11/02/90	\$1,000
Action Committee, Inc.		
Vote Choice	10/29/90	\$2,000
(transfer from authorized joint fundraiser)		

On July 30, 1991, a Request for Additional Information ("RFAI") was sent to the Committee (Attachment 4). The RFAI notes on an informational basis that the Committee may have failed to file one or more of the required 48-Hour Notices for "last minute" contributions of \$1,000 or more. The notice requests the Committee to review their procedures for checking contributions received during the aforementioned time period. In addition, the notice states that although the Commission may take legal steps, any response would be taken into consideration.

^{1/} Schedule A discloses a \$2,000 contribution from this contributor. However, the 48-hour notice for this contributor is \$1,000, thus creating a missing 48-hour notice of \$1,000.

^{2/} Schedule A discloses a \$1,500 contribution from this contributor. However, the 48-hour notice for this contribution is \$1,000, thus creating a missing 48-hour notice of \$500.

^{3/} Schedule A discloses a \$2,000 contribution from the contributor. However, the 48-hour notice for this contribution is for \$1,000, thus creating a missing 48-hour notice of \$1,000.

The amended 1990 30 Day Post-General Report received August 13, 1991 does not address this issue (Attachment 5). However, a RAD analyst has discussed the 48-hour notice reporting requirement problem with three (3) representatives of the Committee (Attachments 6, 7, and 8).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

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FEDERAL ELECTION COMMISSION
1989-1990
CANDIDATE INDEX OF SUPPORTING DOCUMENTS - (E)

DATE 10CT91

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CANDIDATE/COMMITTEE/DOCUMENT	RECEIPTS		DISBURSEMENTS		# OF PAGES	MICROFILM LOCATION
	OFFICE SOUGHT/	PARTY	PRIMARY	GENERAL		
					COVERAGE DATES	TYPE OF FILER
SIMON, PAUL	SENATE	DEMOCRATIC PARTY		ILLINOIS	1996 ELECTION	ID# 841L00040
1. STATEMENT OF CANDIDATE						
1989 STATEMENT OF CANDIDATE					20DEC89	2 90SEN/010/1076
1990 STATEMENT OF CANDIDATE					21NOV90	2 90SEN/022/3359
2. PRINCIPAL CAMPAIGN COMMITTEE						
SIMON FOR SENATE					ID #000169907	SENATE
1989 MID-YEAR REPORT			1,712,005	525,948	1JAN89 -30JUN89	305 89SEN/008/3533
MID-YEAR REPORT - AMENDMENT			-	-	1JAN89 -30JUN89	3 89SEN/009/0488
MID-YEAR REPORT - AMENDMENT			-	-	1JAN89 -30JUN89	4 90SEN/006/2270
MID-YEAR REPORT - AMENDMENT			-	-	1JAN89 -30JUN89	3 90SEN/006/2267
MID-YEAR REPORT - AMENDMENT			-	-	1JAN89 -30JUN89	3 90SEN/013/2197
REQUEST FOR ADDITIONAL INFORMATION					1JAN89 -30JUN89	10 90FEC/620/0023
REQUEST FOR ADDITIONAL INFORMATION 2ND					1JAN89 -30JUN89	12 90FEC/628/1104
YEAR-END			1,567,292	1,014,422	1JUL89 -31DEC89	291 90SEN/003/1077
REQUEST FOR ADDITIONAL INFORMATION					1JUL89 -31DEC89	19 90FEC/631/2573
REQUEST FOR ADDITIONAL INFORMATION 2ND					1JUL89 -31DEC89	20 90FEC/634/2436
1990 48 HOUR CONTRIBUTION NOTICE					8MAR90	4 90SEN/006/2236
48 HOUR CONTRIBUTION NOTICE					9MAR90	3 90SEN/006/2274
48 HOUR CONTRIBUTION NOTICE					14MAR90	4 90SEN/006/2215
48 HOUR CONTRIBUTION NOTICE					19MAR90	6 90SEN/006/2394
48 HOUR CONTRIBUTION NOTICE					18APR90	5 90SEN/008/2685
48 HOUR CONTRIBUTION NOTICE					18APR90	5 90SEN/008/2680
48 HOUR CONTRIBUTION NOTICE					18APR90	5 90SEN/008/2690
STATEMENT OF ORGANIZATION - AMENDMENT					24JUL90	4 90SEN/013/2200
STATEMENT OF ORGANIZATION - AMENDMENT					21AUG90	3 90SEN/014/4281
STATEMENT OF ORGANIZATION - AMENDMENT					6SEP90	3 90SEN/015/1606
48 HOUR CONTRIBUTION NOTICE					22OCT90	3 90SEN/020/1310
48 HOUR CONTRIBUTION NOTICE					23OCT90	5 90SEN/020/1555
48 HOUR CONTRIBUTION NOTICE					25OCT90	5 90SEN/021/2017
48 HOUR CONTRIBUTION NOTICE					25OCT90	6 90SEN/021/1811
48 HOUR CONTRIBUTION NOTICE					29OCT90	6 90SEN/022/0683
48 HOUR CONTRIBUTION NOTICE					30OCT90	4 90SEN/022/0901
48 HOUR CONTRIBUTION NOTICE					31OCT90	3 90SEN/022/0932
48 HOUR CONTRIBUTION NOTICE					1NOV90	4 90SEN/022/1255
48 HOUR CONTRIBUTION NOTICE					2NOV90	3 90SEN/022/1389
PRE-PRIMARY			669,669	835,292	1JAN90 -28FEB90	85 90SEN/006/2151
REQUEST FOR ADDITIONAL INFORMATION					1JAN90 -28FEB90	18 90FEC/638/1525
REQUEST FOR ADDITIONAL INFORMATION 2ND					1JAN90 -28FEB90	19 90FEC/639/5372
APRIL QUARTERLY			568,321	677,178	1MAP90 -31MAP90	109 90SEN/008/1426
REQUEST FOR ADDITIONAL INFORMATION					1MAP90 -31MAP90	28 90FEC/649/1571
REQUEST FOR ADDITIONAL INFORMATION 2ND					1MAP90 -31MAP90	13 90FEC/651/4321
JULY QUARTERLY			1,215,782	830,319	1APR90 -30JUN90	273 90SEN/012/3655
JULY QUARTERLY - AMENDMENT			1,215,782	830,319	1APR90 -30JUN90	248 90SEN/012/2730
1ST LETTER INFORMATIONAL NOTICE					1APR90 -30JUN90	3 90FEC/656/3329
OCTOBER QUARTERLY			1,618,275	1,785,811	1JUL90 -30SEP90	374 90SEN/017/2713

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CANDIDATE/COMMITTEE/DOCUMENT	RECEIPTS		DISBURSEMENTS		COVERAGE DATES	# OF PAGES TYPE OF FILER	MICROFILM LOCATION
	OFFICE SOUGHT/ PARTY	PRIMARY GENERAL	PRIMARY GENERAL	GENERAL			
REQUEST FOR ADDITIONAL INFORMATION					1JUL90 - 30SEP90	18	91FEC/699/4871
REQUEST FOR ADDITIONAL INFORMATION 2ND					1JUL90 - 30SEP90	19	91FEC/703/4828
PRE-GENERAL		499,015		1,162,512	10CT90 - 17OCT90	154	90SEN/021/2637
PRE-GENERAL - AMENDMENT		499,015		1,162,512	10CT90 - 17OCT90	126	90SEN/022/2203
PRE-GENERAL - AMENDMENT		-		-	10CT90 - 17OCT90	5	91SEN/009/1996
PRE-GENERAL - AMENDMENT		-		-	10CT90 - 17OCT90	130	91SEN/009/1901
REQUEST FOR ADDITIONAL INFORMATION					10CT90 - 17OCT90	3	91FEC/705/0476
REQUEST FOR ADDITIONAL INFORMATION 2ND					10CT90 - 17OCT90	4	91FEC/710/4196
POST-GENERAL		579,959		696,141	18OCT90 - 26NOV90	179	90SEN/024/4050
POST-GENERAL - AMENDMENT		-		-	18OCT90 - 26NOV90	3	91SEN/001/3409
POST-GENERAL - AMENDMENT		-		-	18OCT90 - 26NOV90	2	91SEN/009/0660
REQUEST FOR ADDITIONAL INFORMATION					18OCT90 - 26NOV90	54	91FEC/705/0417
REQUEST FOR ADDITIONAL INFORMATION 2ND					18OCT90 - 26NOV90	1	91FEC/710/4194
YEAR-END		31,892		128,891	27NOV90 - 31DEC90	25	91SEN/002/3398
1ST LETTER INFORMATIONAL NOTICE					27NOV90 - 31DEC90	2	91FEC/704/0402

TOTAL

4,517,287 3,944,922 3,052,840 4,503,674

2606 TOTAL PAGES

3. AUTHORIZED COMMITTEES

4. JOINT FUNDRAISING COMMITTEES AUTHORIZED BY THE CAMPAIGN

ILLINOIS '90

1990 STATEMENT OF ORGANIZATION

OCTOBER QUARTERLY

PRE-GENERAL

POST-GENERAL

YEAR-END

ID #000247866 PARTY NON-QUALIFIED

21AUG90

2 90FEC/653/2752

1JUL90 - 30SEP90

8 90FEC/662/0421

10CT90 - 17OCT90

3 90FEC/668/4779

18OCT90 - 26NOV90

5 90FEC/672/3000

27NOV90 - 31DEC90

2 91FEC/682/3270

20 TOTAL PAGES

VOTE CHOICE

1990 STATEMENT OF ORGANIZATION

OCTOBER QUARTERLY

OCTOBER QUARTERLY - AMENDMENT

REQUEST FOR ADDITIONAL INFORMATION

PRE-GENERAL

POST-GENERAL

POST-GENERAL - AMENDMENT

1ST LETTER INFORMATIONAL NOTICE

YEAR-END

ID #000249197 PARTY NON-QUALIFIED

4SEP90

3 90FEC/654/2955

1JAN90 - 30SEP90

21 90FEC/666/1968

1JAN90 - 30SEP90

19 90FEC/677/4383

1JAN90 - 30SEP90

2 90FEC/671/2519

10CT90 - 17OCT90

23 91FEC/690/2052

10CT90 - 26NOV90

24 90FEC/677/4401

18OCT90 - 26NOV90

9 91FEC/690/2044

10CT90 - 26NOV90

1 91FEC/691/4933

27NOV90 - 31DEC90

4 91FEC/686/2416

104 TOTAL PAGES

4B. TRANSFERS IN FROM JOINT FUNDRAISING COMMITTEES AUTHORIZED BY THE CAMPAIGN

VOTE CHOICE

DSCC/HOLLYWOOD WOMENS POL CMTE

1990 POST-GENERAL

POST-GENERAL

5,760

2,000

22OCT90

29OCT90

90SEN/024/4383

90SEN/024/4383

94043562349

FEDERAL ELECTION COMMISSION
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CANDIDATE/COMMITTEE/DOCUMENT	OFFICE SOUGHT/	PARTY	RECEIPTS		DISBURSEMENTS		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION TYPE OF FILER
			PRIMARY	GENERAL	PRIMARY	GENERAL			

TOTAL

7,760

ALL REPORTS HAVE BEEN REVIEWED.
ENDING CASH-ON-HAND AS OF 12/31/90: \$843,731.94
OUTSTANDING DEBTS AS OF 12/31/90: \$0.00

P 4 0 4 3 5 6 2 3 5 0

FEDERAL ELECTION COMMISSION 1991-1992 CANDIDATE INDEX OF SUPPORTING DOCUMENTS - (E)						DATE 100791		PAGE 1	
CANDIDATE/COMMITTEE/DOCUMENT	OFFICE SOUGHT	PARTY	RECEIPTS PRIMARY	GENERAL	DISBURSEMENTS PRIMARY	GENERAL	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION TYPE OF FILE
SIMON, PAUL	SENATE	DEMOCRATIC PARTY					ILLINOIS 1996 ELECTION	ID# 54100040	
1. STATEMENT OF CANDIDATE									
1990 STATEMENT OF CANDIDATE							21NOV90	2	90SEN/022/3259
NOTE: THIS DOCUMENT WAS FILED WITH THE COMMISSION DURING A PREVIOUS ELECTION CYCLE. ADDITIONAL FINANCIAL ACTIVITY REPORTED BY THIS CANDIDATE MAY APPEAR ON INDICIES COVERING THAT EARLIER PERIOD									
2. PRINCIPAL CAMPAIGN COMMITTEE									
SIMON FOR SENATE							ID #000168107	SENATE	
1991 STATEMENT OF ORGANIZATION - AMENDMENT							19AUG91	3	91SEN/009/0977
MID-YEAR REPORT			70,460		247,381		13JAN91 -30JUN91	33	91SEN/007/3004
REQUEST FOR ADDITIONAL INFORMATION							13JAN91 -30JUN91	3	91FEC/712/3973
TOTAL			70,460	0	247,381	0		39	TOTAL PAGES
3. AUTHORIZED COMMITTEES									
4. JOINT FUNDRAISING COMMITTEES AUTHORIZED BY THE CAMPAIGN									
ILLINOIS '90							ID #000247848	PARTY NON-QUALIFIED	
1991 TERMINATION APPROVAL							1MAR91	1	91FEC/089/0066
FEBRUARY MONTHLY - TERMINATED							13JAN91 -20JAN91	3	91FEC/083/0364
TERMINATION REPORT							13JAN91 -20JAN91	4	91FEC/087/0001
TERMINATED								8	TOTAL PAGES
5. VOTE CHOICE							ID #000248167	NON-PARTY QUALIFIED	
1991 MISCELLANEOUS REPORT TO FEC							23SEP91	2	91FEC/083/0033
MID-YEAR REPORT - TERMINATED							13JAN91 -30JUN91	4	91FEC/707/3242
REQUEST FOR ADDITIONAL INFORMATION							13JAN91 -30JUN91	1	91FEC/710/0794
REQUEST FOR ADDITIONAL INFORMATION 2ND							13JAN91 -30JUN91	2	91FEC/711/1741
TERMINATED								9	TOTAL PAGES
46. TRANSFER IN FROM JOINT FUNDRAISING COMMITTEES AUTHORIZED BY THE CAMPAIGN									

ALL REPORTS HAVE BEEN REVIEWED
 ENDING CASH ON HAND AS OF 6/30/91: \$669,838.80.
 OUTSTANDING DEBTS AS OF 6/30/91: \$0.00

GENERAL ELECTION REPORT NOTICE

FEDERAL ELECTION COMMISSION

CONGRESSIONAL CANDIDATES

October 1, 1990

Report	Reporting Period	Reg./Cert. Mailing Date*	Filing Date
Pre-General	10/01/90**-10/17/90	10/22/90	10/25/90
Post-General	10/18/90 - 11/26/90	12/06/90	12/06/90

WHO MUST FILE

All 1990 general election principal campaign committees must file the pre- and post-general election reports.

WHO NEED NOT FILE

Principal campaign committees of candidates not active in the 1990 elections (i.e., committees active in past or future elections) and 1990 campaign committees not participating in the general election do not file the pre- and post-general reports.

WHAT MUST BE REPORTED

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

REPORTING FORMS

Candidate committees use FORM 3 (enclosed). If the campaign has more than one authorized committee, the principal campaign committee must also file a consolidated report on FORM 3Z.

WHERE TO FILE

Consult the instructions on the back of the FORM 3 Summary Page. Note State filing requirements also.

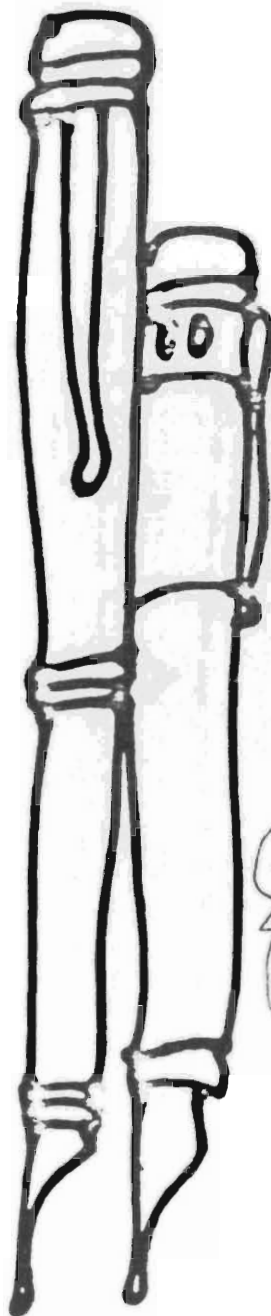
LAST-MINUTE CONTRIBUTIONS

Committees must also file special notices if contributions of \$1,000 or more are received during the period of October 18 through November 3, 1990. The notices must reach the appropriate Federal and State offices within 48 hours of the committee's receipt of the contributions.

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

**The period begins with the close of the last report filed by the committee. If the committee has filed no previous reports, the period begins with the date of the committee's first activity.

240,43562352



CONGRESSIONAL CANDIDATES

GENERAL ELECTION

LABEL

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

COMPLIANCE

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

24043562353

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

01-Dec-90

1990 30 Day Post General Report
SINON FOR SENATE, INC. Page 4 of 112
FEC LINE 11A - INDIVIDUAL RECEIPTS \$200.01.
OCTOBER 18 THRU NOVEMBER 26, 1990

NAME	PREF	DATE	ELECTION	\$ THIS PERIOD
Barber, W. Sigel 841 Junior Terrace Chicago, IL 60613	Mr.	10-19-90	G 90	500.00

EMPLOYER: JMB Realty Corporation
OCCUPATION: Executive Vice President AGGREGATE YTD: \$ 1,500.00

Barnard, Kathleen R. 920 Courtland Avenue Park Ridge, IL 60068	Dr.	10-25-90	G 90	200.00
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EMPLOYER: Washington College
OCCUPATION: Professor AGGREGATE YTD: \$ 400.00

Barrows, Donna B. 525 North East Avenue Oak Park, IL 60302	Mrs.	11-02-90	G 90	1,000.00
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EMPLOYER:
OCCUPATION: Homemaker AGGREGATE YTD: \$ 1,000.00
EPL

Baskin, Sheldon 416 West Webster Chicago, IL 60614	Mr.	11-02-90	G 90	1,000.00
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EMPLOYER:
OCCUPATION: Real Estate
Self-Employed AGGREGATE YTD: \$ 1,000.00
EPL

Bench, Mary 459 Addison Avenue Elmhurst, IL 60126	Mrs.	10-26-90	G 90	25.00
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EMPLOYER:
OCCUPATION: Retired AGGREGATE YTD: \$ 285.00

Page Totals - 1,725.00

01-Dec-90

1990 30 Day Post General Report

SINON FOR SENATE, INC.

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FEC LINE 11A - INDIVIDUAL RECEIPTS \$200.01.

OCTOBER 18 THRU NOVEMBER 26, 1990

NAME	PREP	DATE	ELECTION	\$ THIS PERIOD
Burrell, Barbara 1300 North Lake Shore Drive Apartment 31-D Chicago, IL 60610	Ms.	10-30-90	G 90	500.00

EMPLOYER: Information Requested
OCCUPATION: Information Requested

AGGREGATE YTD: \$ 500.00

Butler, Paul T. 3300 Techny Road Northbrook, IL 60062	Mr.	11-05-90	G 90	20.00
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EMPLOYER: Information Requested
OCCUPATION: Information Requested

AGGREGATE YTD: \$ 220.00

Byrd, Robert D. Hekla Road Rosseau Ontario, POC 1J0 CANADA,	Mr.	10-29-90	G 90	40.00
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EMPLOYER:
OCCUPATION: Retired

AGGREGATE YTD: \$ 220.00

Cahn, June B. 3 Versailles Boulevard New Orleans, LA 70125	Ms.	10-19-90	G 90	250.00
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EMPLOYER: Information Requested
OCCUPATION: Information Requested

AGGREGATE YTD: \$ 250.00

Callahan, John P. 10324 La Vergne Oak Lawn, IL 60453	Mr.	11-02-90	G 90	1,000.00
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EBL

EMPLOYER: Information Requested
OCCUPATION: Information Requested

AGGREGATE YTD: \$ 1,000.00

Page Totals - 1,810.00

01-Dec-90

1990 30 Day Post General Report
SINON FOR SENATE, INC. Page 13 of 112
PEC LINE 11A - INDIVIDUAL RECEIPTS \$200.01.
OCTOBER 18 THRU NOVEMBER 26, 1990

NAME	PREF	DATE	ELECTION	\$ THIS PERIOD
Carson, Georgia Sims 573 Oak Tree Lane Northfield, IL 60093	Mrs.	11-08-90	G 90	300.00

EMPLOYER: Information Requested
OCCUPATION: Information Requested

AGGREGATE YTD: \$ 300.00

Carson, Lela M. Route 1, Box 80 Waverly, IL 62692	Mrs.	10-31-90	G 90	250.00
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EMPLOYER: Information Requested
OCCUPATION: Information Requested

AGGREGATE YTD: \$ 1,200.00

Cha, Eugene 170 Salem Road Vestbury, NY 11590	Mr.	11-14-90	G 90	250.00
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EMPLOYER: Information Requested
OCCUPATION: Information Requested

AGGREGATE YTD: \$ 250.00

Chang, Jae Chul 2701 West Armitage Avenue Chicago, IL 60647	Mr.	10-19-90	G 90	2,000.00*
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EMPLOYER: Information Requested
OCCUPATION: Information Requested

AGGREGATE YTD: \$ 2,000.00

Chang, Peter 2 Waterside Lane Manhasset, NY 11030	Mr.	10-29-90 10-29-90	G 90 G 90	250.00 250.00
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EMPLOYER: Information Requested
OCCUPATION: Information Requested

AGGREGATE YTD: \$ 500.00

Page Totals - 3,300.00

*Possible excessive -- research in progress.

01-Dec-90

1990 30 Day Post General Report
SINON FOR SENATE, INC. Page 35 of 117
FDC LINE 11A - INDIVIDUAL RECEIPTS \$200.01.
OCTOBER 18 THRU NOVEMBER 26, 1990

NAME	PREP	DATE	ELECTION	\$ THIS PERIOD
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Girardi, John A. 5 Burrell Lane Palos Verdes Estates, CA 90274	Mr.	10-24-90	G 90	2,000.00
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EBL

EMPLOYER: Girardi, Keese & Crane
OCCUPATION: Attorney

AGGREGATE YTD: \$ 2,000.00

Gleason, Martin J. 15 W 035 30th Street Winsdale, IL 60521	Mr.	10-26-90 11-02-90	G 90 G 90	150.00 100.00
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EMPLOYER: Gleason Cranes
OCCUPATION: Sales

AGGREGATE YTD: \$ 250.00

Glickstein, Hyman M. 1370 Avenue of The Americas New York, NY 10019	Mr.	11-13-90	G 90	1,000.00
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EMPLOYER:
OCCUPATION: Attorney
Self-Employed

AGGREGATE YTD: \$ 1,000.00

Glickstein, Ruth 1370 Avenue of The Americas New York, NY 10019	Mrs.	11-13-90	G 90	1,000.00
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EMPLOYER: Information Requested
OCCUPATION: Information Requested

AGGREGATE YTD: \$ 1,000.00

Goldenberg, Jill 1111 Beacon Street Apartment 45 Brookline, MA 02146	Ms.	10-26-90	G 90	200.00
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EMPLOYER: Information Requested
OCCUPATION: Student

AGGREGATE YTD: \$ 500.00

Page Totals - 4,450.00

*Possible excessive -- research in progress.

404362236

1990-91 Day-Post General Report

01-Dec-90

SINON FOR SENATE, INC.

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FBC LINE 11A - INDIVIDUAL RECEIPTS \$200.01.

OCTOBER 18 THRU NOVEMBER 26, 1990

NAME	PREF	DATE	ELECTION	\$ THIS PERIOD
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Mardenbergh, William S.	Mr.	10-31-90	G 90	35.00
Route 1, Box 263 Carbondale, IL 62901				

EMPLOYER:
OCCUPATION: Retired

AGGREGATE YTD: \$ 305.00

Harrington, Arthur E.	Mr.	10-22-90	G 90	30.00
360 Mayflower Road				
Claremont, CA 91711				
		10-25-90	G 90	25.00

EMPLOYER:
OCCUPATION: Retired

AGGREGATE YTD: \$ 205.00

Harris, Joan W.	Mrs.	11-02-90	G 90	1,000.00
209 East Lakeshore Drive Chicago, IL 60611				

EBL

EMPLOYER: City of Chicago
OCCUPATION: Commissioner

AGGREGATE YTD: \$ 1,000.00

Easty, Diane	Mrs.	10-26-90	G 90	1,000.00
1620 Lawrence Crescent Plossmoore, IL 60422				

EMPLOYER: Information Requested
OCCUPATION: Information Requested

AGGREGATE YTD: \$ 1,000.00

Easty, Keith A.	Mr.	10-26-90	G 90	1,000.00
1620 Lawrence Crescent Plossmoore, IL 60422				

EMPLOYER: Best Foam Fabricators
OCCUPATION: President

AGGREGATE YTD: \$ 2,250.00

Page Totals - 3,090.00

*Possible excessive -- research in progress.

01-Dec-90

1990 30 Day Post General Report

SINON FOR SENATE, INC.

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PBC LINE 11A - INDIVIDUAL RECEIPTS \$200.01.
OCTOBER 18 THRU NOVEMBER 26, 1990

NAME	PREF	DATE	ELECTION	\$ THIS PERIOD
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Livesey, Lovell W.	Mr.	10-19-90	G 90	300.00
3400 South East View Park Chicago, IL 60615				

EMPLOYER:				
OCCUPATION:	Education Consultant		AGGREGATE YTD: \$	400.00
	Self-Employed			

Love, Denis P.		10-22-90	G 90	20.00
1500 - 12th Street Apartment 314 Vienna, WV 26105				

EMPLOYER:				
OCCUPATION:	Retired		AGGREGATE YTD: \$	215.00

Lue, Jim E.	Mr.	11-02-90	G 90	1,000.00
3028 Thayer Avenue Springfield, IL 62704				

EMPLOYER:	Information Requested			
OCCUPATION:	Information Requested		AGGREGATE YTD: \$	1,000.00

Lui, Leon	Mr.	10-26-90	G 90	250.00
254 Canal Street New York, NY 10013				

EMPLOYER:	Information Requested			
OCCUPATION:	Information Requested		AGGREGATE YTD: \$	250.00

Lung, Conrad H.	Mr.	10-26-90	G 90	250.00
335 West 71st Street New York, NY 10023				

EMPLOYER:	Sunnex Inc.			
OCCUPATION:	President		AGGREGATE YTD: \$	250.00

Page Totals - 1,820.00

01-Dec-90

1990 30 Day Post General Report
SENATE, INC.

Page 64 of 112

LINE 11A - INDIVIDUAL RECEIPTS \$200.01.
OCTOBER 18 THRU NOVEMBER 26, 1990Attachment 3
Page 7 of 17

NAME	PREP	DATE	ELECTION	\$ THIS PERIOD
Lorio, Paul M. 641 Sheridan Square Evanston, IL 60202	Mr.	10-19-90	G 90	1,300.00

AC

EMPLOYER: Schiff Hardin & Vaito
OCCUPATION: Attorney

AGGREGATE YTD: \$ 1,625.00

Lynch, Francis J. 2608 Lakeview Chicago, IL 60614	Mr.	10-29-90	G 90	200.00
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EMPLOYER: Braun, Lynch, Smith & Strobel, Ltd.
OCCUPATION: Attorney

AGGREGATE YTD: \$ 250.00

Ma, Alexander 2-A Lake Road Lake Success, NY 11020	Mr.	10-26-90	G 90	300.00
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EMPLOYER: Information Requested
OCCUPATION: Information Requested

AGGREGATE YTD: \$ 300.00

Macari, Robert 17225 Vollbrecht Drive South Holland, IL 60473	Mr.	11-02-90	G 90	400.00
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EMPLOYER: Coffield & Ungaretti
OCCUPATION: Attorney

AGGREGATE YTD: \$ 1,600.00

Macchiaroli, Carmine 490 Carriage Way Deerfield, IL 60015	Mr.	10-23-90	G 90	400.00
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EMPLOYER: Interior Alterations, Inc.
OCCUPATION: President

AGGREGATE YTD: \$ 400.00

Page Totals - 3,200.00

*Possible excessive -- research in progress.

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01-Dec-90

1990 30 Day Post General Report
SINON FOR SENATE, INC.
FEC LINE 11A - INDIVIDUAL RECEIPTS \$200.01.
OCTOBER 18 THRU NOVEMBER 26, 1990

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NAME	PREF	DATE	ELECTION	\$ THIS PERIOD
Mitchell, Geneva 119 South Water Street Harrisburg, IL 62946	Ms.	10-24-90	G 90	25.00

EMPLOYER:
OCCUPATION: Retired

AGGREGATE YTD: \$ 350.00

Mogged, Patricia G.	Mrs.	10-31-90	G 90	15.00
130 East Walnut		10-31-90	G 90	140.00
Post Office Box 61		10-31-90	G 90	50.00
Piper City, IL 60959				

EMPLOYER:
OCCUPATION: Mogged Construction
Self-Employed

AGGREGATE YTD: \$ 375.00

Moldav, Stuart G.	Mr.	11-02-90	G 90	1,000.00
80 Coughlan Road				
Atherton, CA 94025				

EBL

EMPLOYER: U.S. Venture Partners
OCCUPATION: Venture Capitalist

AGGREGATE YTD: \$ 1,000.00

Moore, Loretta L.	Ms.	10-19-90	G 90	1,000.00
8727 South State Street				
Chicago, IL 60619				

EMPLOYER: C.F. Moore
OCCUPATION: Construction

AGGREGATE YTD: \$ 1,350.00

Morgenstern, J. M.	Dr.	11-08-90	G 90	1,000.00
5600 Vest Addison				
Chicago, IL 60634				

EMPLOYER: Information Requested
OCCUPATION: Physician

AGGREGATE YTD: \$ 1,000.00

Page Totals - 3,230.00

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SIMON FOR SENATE, INC.

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FBC LINE 11A - INDIVIDUAL RECEIPTS \$200.01.

OCTOBER 18 THRU NOVEMBER 26, 1990

NAME	PREF	DATE	ELECTION	\$ THIS PERIOD
Mogaj, Richard J. 1331 Shagbark Lane Wheaton, IL 60187	Mr.	10-24-90	G 90	250.00

EMPLOYER: RJN Environmental Associates Incorporated
OCCUPATION: Executive
AGGREGATE YTD: \$ 500.00

Norcross, John D. Two North Lasalle Street Suite 2000 Chicago, IL 60602	Mr.	10-26-90	G 90	1,000.00
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EMPLOYER: Crane & Norcross
OCCUPATION: Attorney
AGGREGATE YTD: \$ 1,000.00

O'Toole, Robert M. 13069 St. Andrews Court Woodbridge, VA 22192	Mr.	11-02-90	G 90	1,000.00
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EBL

EMPLOYER: Mortgage Bankers Assoc.
OCCUPATION: Trade Assoc. Executive
AGGREGATE YTD: \$ 1,000.00

Oberkamp, Sr., William D. Mrs. 10417 Sugarberry Drive El Paso, TX 79925		10-18-90	G 90	25.00
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EMPLOYER:
OCCUPATION: Homemaker
AGGREGATE YTD: \$ 310.00

Okun, Ervin D. 309 South Rodeo Drive Beverly Hills, CA 90212	Mr.	10-22-90	G 90	300.00
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EMPLOYER: The Walt Disney Company
OCCUPATION: Senior Vice President
AGGREGATE YTD: \$ 300.00

Page Totals - 2,575.00

01-Dec-90

1990 30 Day Post General

SINON FOR SENATE, INC.

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FEC LINE 11A - INDIVIDUAL RECEIPTS \$200.01.

OCTOBER 19 THRU NOVEMBER 26, 1990

Attachment 3

Page 10 of 17

NAME	LAST	DATE	ELECTION	\$ THIS PERIOD
Stollman, Gerald H.	Mr.	10-19-90	G 90	200.00
4342 Ramsgate Lane Bloomfield Hills, MI 48302				

EMPLOYER: Information Requested
OCCUPATION: Educator

AGGREGATE YTD: \$ 400.00

Stone, Ferne	Mrs.	10-19-90	G 90	750.00
950 North Michigan Chicago, IL 60610				

EMPLOYER: Information Requested
OCCUPATION: Information Requested

AGGREGATE YTD: \$ 750.00

Stone, Howard L.	Mr.	10-19-90	G 90	750.00
950 North Michigan Apartment 4603 Chicago, IL 60610				

EMPLOYER: Altschuler, Melvoin & Glasser
OCCUPATION: Partner

AGGREGATE YTD: \$ 937.50

Stone, Thomas H.	Mr.	10-19-90	G 90	2,000.00 *
326 Cedar Avenue Highland Park, IL 60035				

EMPLOYER: Information Requested
OCCUPATION: Information Requested

AGGREGATE YTD: \$ 2,000.00

Sullivan, Robert C.	Mr.	10-31-90	G 90	20.00
1000 West Girard Avenue Monmouth, IL 61462				

EMPLOYER:
OCCUPATION: Retired

AGGREGATE YTD: \$ 375.00

Page Totals - 3,620.00

*Possible expense -- research in progress.

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1990 30 Day Post General Report

03-Dec-90

SIMON FOR SENATE, INC.

Page - 2 of 17

FEC LINE 11C - OTHER POLITICAL COMMITTEES
OCTOBER 18 THRU NOVEMBER 26, 1990

PAC NAME/ADDRESS	DATE	ELECTION	\$ THIS PERIOD
American President Lines, Ltd. Political Action Committee 1800 Harrison Street Oakland, CA 94612	11-14-90	G 90	500.00

AGGREGATE YTD: \$ 2,500.00

American Textile Industry Committee for Good Government 1801 K Street, N.W. Suite 900 Washington, DC 20006	10-29-90	G 90	1,000.00
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AGGREGATE YTD: \$ 1,000.00

Amusement and Music Operators Association - PAC 1101 Connecticut Avenue, N.W. Suite 700 Washington, DC 20036	11-20-90	G 90	1,000.00
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AGGREGATE YTD: \$ 1,000.00

ANA - PAC 1101 - 14th Street, N.W. Suite 200 Washington, DC 20005	11-02-90	G 90	3,000.00
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AGGREGATE YTD: \$ 5,000.00

Arizona Politically Interested Citizens 2929 North 44th Street Number 400 Phoenix, AZ 85018	10-29-90	G 90	2,500.00
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AGGREGATE YTD: \$ 2,500.00

Arklapac 400 East Fourth Street Little Rock, AR 72202	11-05-90	G 90	500.00
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AGGREGATE YTD: \$ 1,500.00

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03-Dec-90

1990 30 Day Post General Report

Page - 9 of 17

SINON FOR SENATE, INC.
PBC LINE 11C - OTHER POLITICAL COMMITTEES
OCTOBER 18 THRU NOVEMBER 26, 1990

PAC NAME/ADDRESS	DATE	ELECTION	\$ THIS PERIOD
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Grand Lodge Chinese American Citizens Alliance 1044 Stockton Street San Francisco, CA 94108	10-19-90	G 90	500.00
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AGGREGATE YTD: \$ 500.00

Marktrader Re-Election Committee 1712 East Shady Oak Drive Peoria, IL 61614	10-30-90	G 90	100.00
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AGGREGATE YTD: \$ 100.00

Health Care Committee for Political Responsibility 1852 North Fremont Chicago, IL 60614	10-30-90	G 90	200.00
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AGGREGATE YTD: \$ 200.00

Heartland PAC 23130 Miles Road Cleveland, OH 44128	10-29-90	G 90	2,000.00
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AGGREGATE YTD: \$ 8,000.00

Human Rights Campaign Fund Political Action Committee Post Office Box 1396 Washington, DC 20013	11-02-90	G 90	2,500.00
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AGGREGATE YTD: \$ 5,000.00

I.L.G.V.U. Campaign Committee 1710 Broadway New York, NY 10019	10-31-90	G 90	1,000.00
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AGGREGATE YTD: \$ 2,400.00

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03-Dec-90

1990 30 Day Post General Report
SINON FOR SENATE, INC.
FBC LINE 11C - OTHER POLITICAL COMMITTEES
OCTOBER 18 THRU NOVEMBER 26, 1990

Page - 10 of 17

PAC NAME/ADDRESS	DATE	ELECTION	\$ THIS PERIOD
Illinois BankPac 205 West Randolph Street Chicago, IL 60606	11-08-90	G 90	4,000.00

AGGREGATE YTD: \$ 5,000.00

Illinois Marketers Political Action Committee Post Office Box 3662 Springfield, IL 62708	10-23-90	G 90	500.00
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AGGREGATE YTD: \$ 1,000.00

Illinois Pover Federal Political Action Committee 500 South 27th Street Decatur, IL 62523	11-02-90	G 90	1,500.00
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AGGREGATE YTD: \$ 4,200.00

Illinois Sane/Freeze Political Action Committee 17 North State Street Room 1132 Chicago, IL 60602	11-02-90	G IR 90	3,500.00
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AGGREGATE YTD: \$ 3,500.00

IMRAPAC Political Fund 1901 Pennsylvania Avenue, N.W. 10th Floor Washington, DC 20006	10-22-90	G 90	1,000.00
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AGGREGATE YTD: \$ 1,000.00

Independent Federation of Flight Attendants Jet PAC 630 Third Avenue New York, NY 10017	10-22-90	G 90	1,000.00
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AGGREGATE YTD: \$ 1,000.00

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03-Dec-90

1990 30 Day Post General Report
SIMON FOR SENATE, INC.
FBC LINE 11C - OTHER POLITICAL COMMITTEES
OCTOBER 18 THRU NOVEMBER 26, 1990

Page - 13 of 17

PAC NAME/ADDRESS	DATE	ELECTION	\$ THIS PERIOD
National Education Association Political Action Committee 1201 - 16th Street, N. W. Washington, DC 20036	11-02-90	G 90	\$ 9,000.00 EBL
AGGREGATE YTD: \$			\$ 9,000.00
Nelson Ragnauer Birthday Committee 2708 Saratoga Granite City, IL 62040	10-23-90	G 90	100.00
AGGREGATE YTD: \$			350.00
National Emergency Medicine Political Action Committee 1125 Executive Circle Irving, TX 75038	10-19-90	G 90	1,000.00
AGGREGATE YTD: \$			1,000.00
O'Melveny & Myers Political Action Committee 555 - 13th Street, N.W. Washington, DC 20004	11-05-90	G 90	500.00
AGGREGATE YTD: \$			500.00
Osteopathic Political Action Committee Post Office Box 10345 Chicago, IL 60610	11-02-90	G 90	500.00
AGGREGATE YTD: \$			500.00
OILPAC Occidental Petroleum 10889 Wilshire Boulevard Los Angeles, CA 90024	10-29-90	G 90	\$ 5,000.00 EBL
AGGREGATE YTD: \$			5,000.00

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03-Dec-90

1990 30 Day Post General Report

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PBC LINE 11C - OTHER POLITICAL COMMITTEES
OCTOBER 18 THRU NOVEMBER 26, 1990

PAC NAME/ADDRESS	DATE	LECTION	\$ THIS PERIOD
Psychologists for Legislative Action Nov Post Office Box 38129 Colorado Springs, CO 80937	10-22-90	C 90	1,500.00

AGGREGATE YTD: \$ 1,500.00

Realtors Political Action Committee 430 North Michigan Avenue Chicago, IL 60611	10-26-90	C 90	2,500.00
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AGGREGATE YTD: \$ 5,000.00

Religion & Tolerance Political Action Committee 1227 - 25th Street, N.W. Suite 700 Washington, DC 20037	10-30-90 10-30-90 11-02-90	C 90 C 90 C 90	2,000.00 2,000.00 1,000.00
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AGGREGATE YTD: \$ 5,000.00

Republic - RSB Companies, Inc. Political Action Committee 1717 Park Street Naperville, IL 60540	10-29-90	C 90	1,000.00
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AGGREGATE YTD: \$ 1,000.00

Richard F. Kelly, Jr. Campaign Fund Post Office Box 326 Hazel Crest, IL 60429	11-02-90	C 90	25.00
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AGGREGATE YTD: \$ 25.00

Roundtable Political Action Committee 125 East 23rd Street Suite 300 New York, NY 10010	10-29-90	C 90	750.00
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AGGREGATE YTD: \$ 2,500.00

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03-Dec-90

1990 30 Day Post General Report
SINON FOR SENATE, INC.
FEC LINE 11C - OTHER POLITICAL COMMITTEES
OCTOBER 18 THRU NOVEMBER 26, 1990

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PAC NAME/ADDRESS DATE ELECTION \$ THIS PERIOD

Russo for Congress Committee 11-02-90 G 90 1,000.00
Post Office Box 627
Oak Lawn, IL 60454

EBL

AGGREGATE YTD: \$ 2,000.00

San Diego Community Political 10-26-90 G 90 1,000.00
Action Committee, Inc. 11-02-90 G 90 1,000.00
1010 Turquoise Street
Suite 203-B
San Diego, CA 92109

EBL

AGGREGATE YTD: \$ 5,000.00

Security Pacific Active Citizenship 10-19-90 G 90 1,500.00
Today Committee
Post Office Box 2097
#9-53
Los Angeles, CA 90051

AGGREGATE YTD: \$ 1,500.00

Sierra Club Committee on Political 10-22-90 G YK 90 528.78
Education 10-26-90 G 90 2,000.00
730 Polk Street 10-26-90 G IK 90 43.94
San Francisco, CA 94109

AGGREGATE YTD: \$ 7,636.41

Steczo Citizens Committee 11-16-90 G 90 25.00
Post Office Box 203
Oak Forest, IL 60452

AGGREGATE YTD: \$ 25.00

Svidler & Berlin PAC 11-09-90 G 90 1,000.00
3000 K Street, N.W.
Suite 300
Washington, DC 20007

AGGREGATE YTD: \$ 1,000.00

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1990 30 Day Post General Report

60-200-00

01/01/2000

Best Choice
10316 Chivers Boulevard
Chivers City, CA 94312

[illegible]

Answer

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7,760.00

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20543

RQ-2

11 30 1991

Edward T. Joyce, Treasurer
Simon for Senate
3 West Old State Capitol Plaza
Springfield, IL 62701

Identification Number: C00168807

Reference: 30 Day Post-General Report (10/18/90-11/26/90)

Dear Mr. Joyce:

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

-Schedule A of your report (pertinent portion attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. An individual or a political committee other than a qualified multicandidate committee may not make a contribution to a candidate for federal office in excess of \$1,000 per election. The term "contribution" includes any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for federal office. (2 U.S.C. §441a(a) and (f); 11 CFR §110.1(b), (e) and (k)) It appears as if you have accepted contributions from two foreign nationals. In addition, foreign nationals are prohibited from making contributions to a candidate for federal office. (110.4(a)(1) and (2))

-Schedule A of your report discloses a contribution (Mortgage Bankers Political Action Committee) received after the 1990 Primary which is designated for the primary., and contributions received after the 1990 General Election which are designated for that election. These contribution may be accepted by you only to the extent that you have outstanding debts remaining from the primary and general elections. (11 CFR §110.1(b)(3)(i))

A contribution is considered to be made when the contributor relinquishes control over the contribution. A contributor shall be considered to have relinquished control over the contribution when it is delivered to the candidate, when it is delivered to an authorized committee of the candidate, or to an agent of an

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authorized committee of the candidate. A contribution that is mailed to any of the aforementioned recipients will be considered to have been made on the date of the postmark. Envelopes should be retained for the committee's records. (11 CFR §110.1(6))

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information. If the contribution(s) you received exceeds the limits, you should either refund to the donor the amount in excess of \$1,000 or get the donor to redesignate and/or reattribute the contribution in writing. If the contribution(s) accepted by you exceeds the amount of outstanding debt remaining from the primary and general elections, you should refund the contribution(s) or seek redesignation of the contribution(s), in writing, from the contributor. The Commission should be notified if a refund is necessary.

All refunds, redesignations, and reattributions must be made within sixty days of the treasurer's receipt of the contribution. Copies of refund checks and copies of letters reattributing or redesignating the contributions in question may be used to respond to this letter. Refunds are reported on Line 20 of the Detailed Summary Page and on Schedule B of the report covering the period in which they are made. Redesignations and reattributions are reported as memo entries on Schedule A of the report covering the period in which the authorization for the redesignation and/or reattribution is received. (11 CFR §104.8(d)(2), (3) and (4))

The Commission notes your refund of many of the excessive contributions. Although the Commission may take further legal steps, prompt action by you to refund or seek redesignation and/or reattribution of the apparent outstanding excessive and prohibited amounts will be taken into consideration.

-Your report discloses a transfer of joint fundraising receipts (pertinent portion attached). You must provide a Memorandum Schedule A showing your share of gross receipts. Contributions from original contributors whose total contributions to your committee have exceeded \$200 during the calendar year should be itemized on this schedule. The itemization should include the full name, mailing address and zip code of the person, along with the name of his/her employer, the date of the contribution, his/her occupation, the election designation and the aggregate year-to-date amount of contributions made by the person. Please amend your report to include a memo Schedule A if necessary. (11 CFR §102.17(c)(8)(i)(B))

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-Schedule B supporting Line 20(c) discloses a refund to Democratic Senatorial Campaign Committee. However, it appears that only \$17,500.00 in receipts from this committee have been reported by your committee. Please clarify this matter and amend your reports.

-All contributions received by your committee from October 18, 1990 through November 26, 1990 are required to be reported on this report. Your committee filed numerous 48 hour notices disclosing "last minute" contributions. However, the following four contributions listed on your 48 hour notices do not appear on Schedule A of this report:

Donna Stone	10/22/90	\$1,000
Harith A. Razaa	10/29/90	\$1,000
Melanie Smith Razaa	10/29/90	\$1,000
Denise Girandi	10/25/90	\$1,000

Please amend your report to include these contributions or provide an explanation of this apparent discrepancy.

-Schedule A of your report indicates that your committee may have failed to file one or more of the required 48 hour notices regarding "last minute" contributions received by your committee after the close of books for the 12 Day Pre-General Report. A principal campaign committee must notify the Commission, in writing, within 48 hours of any contribution of \$1,000 or more received between two and twenty days before an election. These contributions are then reported on the next report required to be filed by the committee. To ensure that the Commission is notified of last minute contributions of \$1,000 or more to your campaign, it is recommended that you review your procedures for checking contributions received during the aforementioned time period. Although the Commission may take legal action, any response you wish to make concerning this matter will be taken into consideration. (11 CFR §104.5(f))

-Commission Regulations define the term "purpose" to mean a brief statement or description of why a disbursement was made. Examples are "dinner expense", "media", "salary", "polling", "travel", "party fees", "phone banks", "travel expenses", "travel expense reimbursement" and "catering costs". Unacceptable descriptions include "advance", "election day expense", "expenses", "other expenses", "expense reimbursement", "miscellaneous", "outside services", "get-out-the-vote" and "voter registration". (11 CFR §104.3(b)(4)) Please amend Schedule B of your report to clarify the descriptions which do not meet the requirements of the Regulations. Additionally, you have itemized disbursements for which you have failed to include a

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complete address. Please amend your report to include the missing information for each of these entries.

A written response or an amendment to your original report(r) correcting the above problem(s) should be filed with the Secretary of the Senate, 232 Hart Senate Office Building, Washington, DC 20510 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,



Emily Leonard
Reports Analyst
Reports Analysis Division

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RECEIVED
FEDERAL ELECTION
REPORTS ANALYST

LEPSTEIN BECHTOLD & GROSS AUG 13 PH 3:33

ATTORNEYS AT LAW

1227 25th STREET N.W.

WASHINGTON D.C. 20037-1188

202 861 0800

TELEPHONE 202 298 2802

DIRECT LINE

FOUR EMBARKMENT
SAN FRANCISCO CALIFORNIA 94111-5074
(415) 398 3044

18201 MERIT DRIVE
DALLAS TEXAS 75231-2737
(214) 480 3143

116 SOUTH MONROE STREET
TALLAHASSEE FLORIDA 32301-1510
(904) 881 0896

2400 SOUTH DIXIE HIGHWAY SUITE 100
MIAMI FLORIDA 33133
(305) 886 1100

510 KING STREET SUITE 300
ALEXANDRIA VIRGINIA 22304-3132
(703) 884 1204

Aug 13, 1991

HAND-DELIVERED

Emily Leonard, Reports Analyst
Reports Analyst Division
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Identification Number: C00168807

Reference: Simon for Senate 30 Day Post General Report (10/18/90-11/26/90)

Dear Ms. Leonard:

This letter is in response to your letter addressed to Mr. Edward T. Joyce, concerning the Simon for Senate 30 Day Post-General Report. As discussed today by telephone, Leslie J. Kerman, Counsel for the Simon for Senate Committee, is on travel in Europe until August 23, 1991. Per discussions with Ms. Kerman, this office will file the Simon for Senate response to your letter during the week of August 26, 1991.

Thank you for your assistance in this matter.

Sincerely,

Mary-Elizabeth Vago

MEMORANDUM TO FILES:

DATE 8/13/91

TELECON xxx
VISIT

NAME OF COMMITTEE: Simon for Senate

SUBJECT: 30-Day Post-General Letter
Failure to File 48 Hour Notices

FEC REP: Emily Leonard

COMMITTEE REP: Gerald Sinclair

Gerald Sinclair called the Commission on 8/13/91 to state Leslie Kerman, the one who usually responds to letters sent by the FEC, was on vacation for two weeks. He was wondering if it was acceptable if she responds to the letters when she returns. The RAD analyst told him the letter should be responded to as soon as possible.

It was explained to him that the problem involving the failure of filing 48 hour notices is referable to the Office of General Counsel. The analyst suggested that Mr. Sinclair research this problem immediately and a response be sent to the Commission if an explanation or clarification of the discrepancy is found. The analyst also encouraged Mr. Sinclair to put a written statement on public record expressing the committee's good faith in trying to comply with the 48 hour notice rule and that the error in filing all of the required notices was unintentional. The analyst told Mr. Sinclair many of the missing 48 hour notices were for contributions received on 11/2/90. Mr. Sinclair stated the discrepancy may be due to a reporting error in receipt dates because he did not remember the committee receiving many contributions that close to the election.

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MEMORANDUM TO FILES:

DATE 8/13/91

TELECON xxx
VISIT

NAME OF COMMITTEE: Simon for Senate

SUBJECT: 30 Day Post-General Letter
Failure to File 48 Hour Notices

FEC REP: Emily Leonard

COMMITTEE REP: Patsy Vaigo

Earlier on this day, a RAD employee spoke with Gerald Sinclair
(see previous telecon).

Patsy Vaigo, Leslie Kerman's secretary, called to follow up on
this earlier conversation. The RAD analyst reiterated the suggestions
to try to find the source of the 48 hour notice problem and to get a
statement on public record addressing the Committee's failure to
file many of the required notices. Ms. Vaigo requested a copy of
the 30 Day Post-General letter be made for the messenger she was
sending to the Commision.

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MEMORANDUM TO FILES:

DATE 9/11/91

TELECON xxx
VISIT

NAME OF COMMITTEE: Simon for Senate

SUBJECT: 30 Day Post- General Letter
Failure to File 48 Hour Notices

FEC REP: Emily Leonard

COMMITTEE REP: Leslie Kerman

On 9/11/91 Leslie Kerman called with questions concerning the 12 Day Pre-General and 30 Day Post-General letters. In reference to the 48 hour notice reporting requirement problem addressed on the 30 Day Post-General letter, she was told the matter is going to be referred to the Office of General Counsel. She was told she should research and respond to the problem immediately. Ms. Kerman stated she was researching a possible reason for the problem. She also stated she was surprised by the omission of many 48 hour notices because she thought they had implemented such a good system of tracking these contributions.

94043562378

RECEIVED
OCT 24 PM 2:07

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

SENSITIVE

FIRST GENERAL COUNSEL'S REPORT

RAD Referral #91L-88
STAFF MEMBER: Jeffrey Long

SOURCE: INTERNALLY GENERATED

RESPONDENTS: Simon for Senate and Edward T. Joyce,
as treasurer

RELEVANT STATUTE: 2 U.S.C. § 434(a)(6)

I. GENERATION OF MATTER

24043562379
The Office of the General Counsel received a referral from the Reports Analysis Division ("RAD") on October 17, 1991. Attachment 1. The basis for the attached referral is the failure of Simon for Senate and Edward T. Joyce, as treasurer, ("Committee" or "Respondents") to file four 48 Hour notifications ("48 Hour Notices") for contributions totaling \$37,000. Paul Simon won the 1990 General Election in the State of Illinois with 65 percent of the vote.

II. FACTUAL AND LEGAL ANALYSIS

See Attachment 2.

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

The Office of the General Counsel recommends that the Commission find reason to believe that the Committee violated 2 U.S.C. § 434(a)(6). In addition, this Office recommends that the Commission offer to enter into conciliation with the Respondents prior to a finding of probable cause to believe.

2404356230
IV. RECOMMENDATIONS

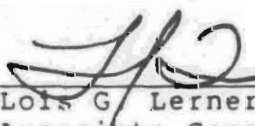
1. Open a MUR.
2. Find reason to believe that Simon for Senate and Edward T. Joyce, as treasurer, violated 2 U.S.C. § 434(a)(6), and enter into conciliation prior to a finding of probable cause to believe.
3. Approve the appropriate letter, Factual and Legal Analysis, and proposed conciliation agreement.

Lawrence M. Noble
General Counsel

Date

3/24/92

BY:


Lois G. Lerner
Associate General Counsel

Attachments:

1. Referral Materials
2. Factual and Legal Analysis
3. Proposed Conciliation Agreement



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS /DONNA ROACH *DR*
COMMISSION SECRETARY

DATE: MARCH 26, 1992

SUBJECT: RAD REFERRAL #91L-88 - FIRST GENERAL COUNSEL'S REPORT
DATED MARCH 24, 1992

The above-captioned document was circulated to the
Commission on TUESDAY, MARCH 24, 1992 at 4:00 P.M.

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

Commissioner Aikens	_____
Commissioner Elliott	_____
Commissioner McDonald	_____
Commissioner McGarry	_____
Commissioner Potter	XXX
Commissioner Thomas	_____

This matter will be placed on the meeting agenda
for TUESDAY, MARCH 31, 1992

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

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) RAD Referral 91L-88
Simon for Senate and)
Edward T. Joyce, as treasurer)

(MUR
3495)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on March 31, 1992, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions with respect to RAD Referral #91L-88:

1. Open a MUR.
2. Find reason to believe that Simon for Senate and Edward T. Joyce, as treasurer, violated 2 U.S.C. § 434(a)(6), and enter into conciliation prior to a finding of probable cause to believe.
3. Approve the appropriate letter, Factual and Legal Analysis, and proposed conciliation agreement as recommended in the General Counsel's report dated March 24, 1992.

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

Attest:

4-1-92
Date

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

24043562382



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 3, 1992

Edward T. Joyce, Treasurer
Simon for Senate
3 West Old State Capitol Plaza, Suite 203
Springfield, Illinois 62701

RE: MUR 3495
Simon for Senate and Edward T.
Joyce, as treasurer

Dear Mr. Joyce:

On March 31, 1992, the Federal Election Commission found that there is reason to believe Simon for Senate ("Committee") and you, as treasurer, violated 2 U.S.C. § 434(a)(6), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

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

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

In order to expedite the resolution of this matter, the Commission has also decided to offer to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe. Enclosed is a conciliation agreement that the Commission has approved.

94043562383

Edward T. Joyce, Treasurer
Page 2

If you are interested in expediting the resolution of this matter by pursuing preprobable cause conciliation and if you agree with the provisions of the enclosed agreement, please sign and return the agreement, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible.

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

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address, and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

This matter will remain confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 219-3690.

Sincerely,



Joan D. Aikens
Chairman

Enclosures

Factual and Legal Analysis
Procedures
Designation of Counsel Form
Conciliation Agreement

2404356234

FEDERAL ELECTION COMMISSION
FACTUAL & LEGAL ANALYSIS

MUR 3495

RESPONDENTS: Simon for Senate and
Edward T. Joyce, as treasurer

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. See 2 U.S.C. § 437g(a)(2).

94043562385
The Federal Election Campaign Act of 1971, as amended ("the Act"), requires principal campaign committees of candidates for federal office to notify in writing either the Secretary of the Senate, the Clerk of the U.S. House of Representatives or the Commission, as appropriate, and the Secretary of State, of each contribution totaling \$1,000 or more, received by any authorized committee of the candidate after the 20th day but more than 48 hours before any election. 2 U.S.C. § 434(a)(6)(A). The Act further requires notification to be made within 48 hours after the receipt of the contribution and to include the name of the candidate and office sought, the date of receipt, the amount of the contribution, and the identification of the contributor. Id. The notification of these contributions shall be in addition to all other reporting requirements. 2 U.S.C. § 434(a)(6)(B).

The General Election in the state of Illinois was held on November 6, 1990. Pursuant to the Act, the Respondents were required to notify the Commission, in writing, of all

contributions of \$1,000 or more received from October 18 to November 3, 1990, within 48 hours of receipt. A review of the Committee's 1990 30 Day Post-General Report identified 21 contributions received between October 19 to November 2, 1990, of \$1,000 or more totaling \$37,000. The Committee did not submit 48 Hour Notices for these contributions.

Therefore, there is reason to believe that Simon for Senate and Edward T. Joyce, as treasurer, violated 2 U.S.C. § 434(a)(6) by failing to report campaign contributions of \$1,000 or more, received after the 20th day, but more than 48 hours before the general election, within 48 hours of receipt of the contributions.

24043562386



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 8, 1992

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Edward T. Joyce, Treasurer
Simon for Senate
3 West Old State Capitol Plaza
Suite 203
Springfield, Illinois 62701

RE: MUR 3495
Simon for Senate and Edward
T. Joyce, as treasurer

Dear Mr. Joyce:

On April 3, 1992, you were notified that the Federal Election Commission, on March 31, 1992, found reason to believe Simon for Senate ("Committee") and you, as treasurer, violated 2 U.S.C. § 434(a)(6). Under the Federal Election Campaign Act of 1971, as amended, and Commission regulations, you have an opportunity to demonstrate that no further action should be taken against the Committee and you, as treasurer, and to request pursuing pre-probable cause conciliation.

A review of our files indicates that the Commission has not yet received a response from you. Unless we receive a response within 15 days, this matter will proceed to the next stage of the enforcement process.

Should you have any questions, please contact me at (202) 219-3690.

Sincerely,

A handwritten signature in dark ink, appearing to read "Jeffrey D. Long", is written over a light-colored rectangular background.

Jeffrey D. Long
Paralegal

94043562387

OGC 4666

EPSTEIN BECKER & GREEN, P.C.

ATTORNEYS AT LAW

1227 25TH STREET, N.W.

WASHINGTON, D.C. 20037-1156†

(202) 861-0900

TELECOPIER (202) 296-2882

DIRECT LINE

270 PARK AVENUE

NEW YORK, NEW YORK 10177-0077†

(212) 351-4500

1875 CENTURY PARK EAST

LOS ANGELES, CALIFORNIA 90067-2501

(310) 556-8861

SIX LANDMARK SQUARE

STAMFORD, CONNECTICUT 06901-2704†

(203) 348-3737

ONE RIVERFRONT PLAZA

NEWARK, NEW JERSEY 07102-8401†

(201) 642-1900

101 FEDERAL STREET

BOSTON, MASSACHUSETTS 02110-1800

(617) 342-7052

†P.C. NEW YORK, WASHINGTON, D.C., NEW JERSEY,
CONNECTICUT, VIRGINIA AND TEXAS ONLY

111 PINE STREET

SAN FRANCISCO, CALIFORNIA 94111-5614

(415) 398-3500

12750 MERIT DRIVE

DALLAS, TEXAS 75251-1209†

(214) 490-3143

116 SOUTH MONROE STREET

TALLAHASSEE, FLORIDA 32301-1530

(904) 681-0526

2400 SOUTH DIXIE HIGHWAY, SUITE 100

MIAMI, FLORIDA 33133

(305) 856-1000

510 KING STREET, SUITE 301

ALEXANDRIA, VIRGINIA 22314-3132†

(703) 684-1204

May 18, 1992

HAND-DELIVERED

Jeffrey D. Long
Federal Election Commission
Office of the General Counsel
999 E Street, N.W.
Room 657
Washington, D.C. 20463

RE: M.U.R. 3495: Respondents Simon for Senate and Edward T. Joyce, As
Treasurer

Dear Mr. Long:

Enclosed please find a completed Statement of Designation of Counsel in the above-referenced matter.

As you are aware, our office received the Factual and Legal Analysis in M.U.R. 3495, including the list of contributions in question, on Tuesday, April 28, 1992. We are now working to gather the information necessary to respond to the Commission's reason-to-believe finding. As you can imagine, compilation of such information takes a fair amount of time, because Simon for Senate ("the Committee") currently is not an active campaign committee. Thus, the Committee presently does not have any full-time staffers.

In this regard, we hereby request an extension-of-time until June 3, 1992 to respond to the Commission's reason-to-believe finding in this matter. This extension is necessary for our office to prepare a thorough and complete response to the Commission's determination.

92 MAY 18 PM 4:20 804

24043562300

Jeffrey D. Long
May 18, 1992
Page 2

Thank you in advance for your assistance. Please do not hesitate to contact me at 202/861-1877 if you have any questions regarding the enclosed document or the Committee's extension-of-time request.

Sincerely,



Leslie J. Kerman
Counsel

Simon for Senate and Edward T. Joyce, As Treasurer

Enclosure

2404356239

STATEMENT OF DESIGNATION OF COUNSEL

MUR 3495

NAME OF COUNSEL: Leslie J. Kerman

ADDRESS: Epstein Becker & Green, P.C.
1227 25th Street, N.W., Suite 700
Washington, D.C. 20037

TELEPHONE: 202/861-1877

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.

May 18, 1992
Date

Gerald S. Sullivan
Signature *Comptroller*

RESPONDENT'S NAME: Simon for Senate and Edward T. Joyce As Treasurer

ADDRESS: P.O. Box 429
Salem, Illinois 62881

HOME PHONE: -----

BUSINESS PHONE: -----

2404356230



FEDERAL ELECTION COMMISSION

WASHINGTON D.C. 20463

May 27, 1992

Leslie J. Kerman, Esquire
Epstein, Becker & Green, P.C.
1227 25th Street, N.W. Suite 700
Washington, D.C. 20037

RE: MUR 3495
Simon for Senate and
Edward T. Joyce, as
treasurer

Dear Ms. Kerman:

This is in response to your letter dated May 18, 1992, which we received on that day, requesting an extension until June 3, 1992, to respond in the above-referenced matter. After considering the circumstances presented in your letter, the Office of the General Counsel has granted the requested extension. Accordingly, your response is due by the close of business on June 3, 1992.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

A handwritten signature in cursive script, which appears to read "Jeffrey D. Long", is written over a rectangular area.

Jeffrey D. Long
Paralegal

94043562391

RECEIVED
F.E.C.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Simon for Senate and Edward
T. Joyce, as treasurer

MUR 3495

SENSITIVE

GENERAL COUNSEL'S REPORT

On March 31, 1992, the Commission found reason to believe Simon for Senate and Edward T. Joyce, as treasurer ("the Committee"), violated 2 U.S.C. § 434(a)(6) by failing to file 48 Hour Notifications for contributions totaling \$37,000. The Committee was notified of the Commission's findings on April 3, 1992. Pre-probable cause conciliation was offered at that time.

This Office mailed a reminder letter on May 8, 1992, having received no response from the Committee. On May 18, 1992, a designation of counsel and letter were received from Leslie Kerman representing the Committee, in which Ms. Kerman requested an extension of time to respond until June 3, 1992. The extension has been granted. After reviewing the Committee's response this Office will make an appropriate report to the Commission.

Lawrence M. Noble
General Counsel

Date

6/2/92

BY:



Lois G. Lerner
Associate General Counsel

Staff assigned: Jeffrey Long



FEDERAL ELECTION COMMISSION

WASHINGTON D.C. 20463

July 17, 1992

HAND DELIVERED

Leslie J. Kerman, Esquire
Epstein, Becker & Green, P.C.
1227 25th Street, N.W.
Suite 700
Washington, D.C. 20037

RE: MUR 3495
Simon for Senate and Edward
T. Joyce, as treasurer

Dear Ms. Kerman:

On April 3, 1992, your clients were notified that the Federal Election Commission, on March 31, 1992, found reason to believe that they violated 2 U.S.C. § 434(a)(6). After receiving no response, a reminder letter was mailed to the respondents on May 8, 1992. You then requested on May 18, 1992, an extension of time to respond on behalf of your clients. On May 27 you were notified that your request for an extension was granted until June 3, 1992.

A review of our files indicates that the Commission has not yet received a response from you. Unless we receive a response within 5 days, this matter will proceed to the next stage of the enforcement process.

Should you have any questions, please contact me at (202) 219-3690.

Sincerely,

A handwritten signature in cursive script, appearing to read "Jeffrey D. Long", is written over a horizontal line.

Jeffrey D. Long
Paralegal

94043562393

EPSTEIN BECKER & GREEN, P. 92 JUL 22 PM 5:05

ATTORNEYS AT LAW

1227 25TH STREET, N.W.

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(703) 684-1204

†P.C. NEW YORK, WASHINGTON, D.C., NEW JERSEY,
CONNECTICUT, VIRGINIA AND TEXAS ONLY

July 22, 1992

HAND-DELIVERED

Jeffrey D. Long
Federal Election Commission
Office of the General Counsel
999 E Street, N.W.
Room 657
Washington, D.C. 20463

RE: M.U.R. 3495: Respondents Simon for Senate and Edward T. Joyce, As
Treasurer

Dear Mr. Long:

This is to acknowledge receipt of your letter of July 17, 1992 in connection with the above-referenced matter. In addition, this is to serve as an initial response to the Commission's reason-to-believe finding.

Specifically, Simon for Senate and Edward T. Joyce, as Treasurer ("the Committee"), hereby deny that it failed to file "last minute" contribution reports in connection with 21 contributions received in the fall of 1990.

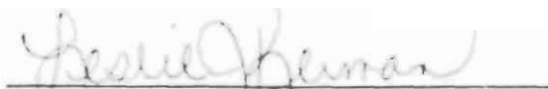
The Committee currently is compiling factual information to rebut the Commission's finding in this matter. Unfortunately, this is taking longer than anticipated. However, the Committee expects that it will be able to forward such information to your office in the near future.

94043562394

Jeffrey D. Long
July 22, 1992
Page 2

In the meantime, please do not hesitate to contact me at 202/861-1877 if you have any questions regarding this initial response.

Sincerely,



Leslie J. Kerman

Counsel

Simon for Senate and Edward T. Joyce, As Treasurer

24043562375

JUN 30 3 59 PM '94

BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of

)
) Enforcement Priority
)

GENERAL COUNSEL'S QUARTERLY REPORT

I. INTRODUCTION

This report is the second Enforcement Priority System Quarterly Report. The purpose of this Quarterly Report is to recommend that the Commission no longer pursue the identified lower priority and stale cases.

II. CASES RECOMMENDED FOR CLOSING

A. Cases Not Warranting Further Pursuit Relative to Other Cases Pending Before the Commission

A critical component of the Priority System is identifying those pending cases that do not warrant the further expenditure of resources. Each incoming matter is evaluated using Commission approved criteria

By closing such cases the Commission is able to use its limited resources to focus on more important cases.

Having evaluated incoming matters, this Office has identified 16 cases which do not warrant further pursuit relative to the other pending cases.¹ A short

1. These matters are: MUR 3920; MUR 3930; MUR 3934; MUR 3939; MUR 3942; MUR 3943; MUR 3945; MUR 3948; MUR 3953; MUR 3955; MUR 3957; MUR 3964; MUR 3965; MUR 3967; RAD 94L-22; and RAD 94L-25.

24043562396

description of each case and the factors leading to assignment of a relatively low priority and consequent recommendation not to pursue each case is attached to this report. See Attachments 1-16. For the Commission's convenience, the narratives for externally-generated matters are immediately followed by the complaint and response(s) and the narratives for internally-generated matters are immediately followed by the referral.

B. Stale Cases

Investigations are severely impeded and require relatively more resources when the activity and evidence are old. Consequently, the Office of General Counsel recommends that the Commission focus its efforts on cases involving more recent activity. Such efforts will also generate more impact on the current electoral process and are a more efficient allocation of our limited resources. To this end, this Office has identified 42 cases that

do not warrant further investment of significant Commission resources.² Since the recommendation not to pursue the identified cases is based on staleness, this Office has not prepared separate

2. These matters are: MUR 3132; MUR 3432; MUR 3466; MUR 3470; MUR 3473; MUR 3495; MUR 3558; MUR 3575; MUR 3581; MUR 3594; MUR 3600; MUR 3625; MUR 3647; MUR 3663; MUR 3684; MUR 3698; MUR 3712; MUR 3733; MUR 3744; MUR 3749; MUR 3756; MUR 3759; MUR 3767; MUR 3776; MUR 3779; RAD 92L-26, RAD 93L-25; RAD 93L-26; RAD 93L-29; RAD 93L-31; RAD 93L-33; RAD 93L-35; RAD 93L-36; RAD 93L-38; RAD 93L-39; RAD 93NF-02; RAD 93NF-03; RAD 93NF-06; RAD 93NF-10; RAD 93NF-12; RAD 93NF-15; and RAD 93NF-20.

narratives for these cases. However, for externally-generated matters in which the Commission has made no findings, the complaint and response(s) are attached to the report and for internally-generated matters in which the Commission has made no findings, the referral is attached. See Attachments 17-53. Because the Commission has already made findings in five of the stale cases, no additional information is being attached to this report in regard to these cases.³

3. These matters are: MUR 3132, MUR 3432, MUR 3466, MUR 3495, and MUR 3733.

24043562328

24043562399

This Office recommends that the Commission exercise its prosecutorial discretion and no longer pursue the identified cases effective August 1, 1994. This will allow the Legal Review Team adequate time to prepare the Pre-MUR and MUR files so that the cases can appear on the public record by September 1, 1994, within 30 days of the August 1, 1994, closing date. This timeframe also will enable this Office to prepare closing letters so that the letters can be mailed on August 2, 1994. Additionally, the Press Office will need time to review the files for inclusion in one of its press releases.

III. RECOMMENDATIONS

A. Decline to open a MUR and close the file in the following matters to be effective on August 1, 1994:

- 1) RAD 92L-26
- 2) RAD 93L-25
- 3) RAD 93L-26
- 4) RAD 93L-29
- 5) RAD 93L-31
- 6) RAD 93L-33
- 7) RAD 93L-35
- 8) RAD 93L-36
- 9) RAD 93L-38
- 10) RAD 93L-39
- 11) RAD 94L-22
- 12) RAD 94L-25
- 13) RAD 93NF-02
- 14) RAD 93NF-03
- 15) RAD 93NF-06
- 16) RAD 93NF-10
- 17) RAD 93NF-12
- 18) RAD 93NF-15
- 19) RAD 93NF-20

B. Take no action, close the file effective on August 1, 1994, and approve the appropriate letter in the following matters:

- 1) MUR 3470
- 2) MUR 3473
- 3) MUR 3558
- 4) MUR 3575
- 5) MUR 3581
- 6) MUR 3594
- 7) MUR 3600
- 8) MUR 3625
- 9) MUR 3647
- 10) MUR 3663
- 11) MUR 3684
- 12) MUR 3698
- 13) MUR 3712
- 14) MUR 3744
- 15) MUR 3749
- 16) MUR 3756
- 17) MUR 3759
- 18) MUR 3767
- 19) MUR 3776
- 20) MUR 3779
- 21) MUR 3920
- 22) MUR 3930
- 23) MUR 3934
- 24) MUR 3939
- 25) MUR 3942
- 26) MUR 3943
- 27) MUR 3945
- 28) MUR 3948
- 29) MUR 3953
- 30) MUR 3955
- 31) MUR 3957
- 32) MUR 3964
- 33) MUR 3965
- 34) MUR 3967

24043562400

C. Take no further action, close the file effective on August 1, 1994, and approve the appropriate letter in the following matters:

- 1) MUR 3132
- 2) MUR 3432
- 3) MUR 3466
- 4) MUR 3495
- 5) MUR 3733

Date

6/30/94


Lawrence M. Noble
General Counsel

24043562401

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of
Enforcement Priority

)
) Agenda Document
) #X94-72

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on July 19, 1994, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions with respect to Agenda Document #X94-72:

A. Decline to open a MUR and close the file in the following matters to be effective on August 1, 1994:

- 1) RAD 92L-26
- 2) RAD 93L-25
- 3) RAD 93L-26
- 4) RAD 93L-29
- 5) RAD 93L-31
- 6) RAD 93L-33
- 7) RAD 93L-35
- 8) RAD 93L-36
- 9) RAD 93L-38
- 10) RAD 93L-39
- 11) RAD 94L-22
- 12) RAD 94L-25
- 13) RAD 93NF-02
- 14) RAD 93NF-03
- 15) RAD 93NF-06
- 16) RAD 93NF-10
- 17) RAD 93NF-12
- 18) RAD 93NF-15
- 19) RAD 93NF-20

(continued)

24043562402

Federal Election Commission
Certification: Enforcement Priority
July 19, 1994

Page 2

- B. Take no action, close the file effective on August 1, 1994, and approve the appropriate letter in the following matters:

- 1) MUR 3470
2) MUR 3473
3) MUR 3558
4) MUR 3575
5) MUR 3581
6) MUR 3594
7) MUR 3600
8) MUR 3625
9) MUR 3647
10) MUR 3663
11) MUR 3684
12) MUR 3698
13) MUR 3712
14) MUR 3744
15) MUR 3749
16) MUR 3756
17) MUR 3759
18) MUR 3767
19) MUR 3776
20) MUR 3779
21) MUR 3920
22) MUR 3930
23) MUR 3934
24) MUR 3939
25) MUR 3942
26) MUR 3943
27) MUR 3945
28) MUR 3948
29) MUR 3953
30) MUR 3955
31) MUR 3957
32) MUR 3964
33) MUR 3965
34) MUR 3967

(continued)

2 4 0 4 3 5 6 2 4 0 3

C. Take no further action, close the file effective on August 1, 1994, and approve the appropriate letter in the following matters:

- 1) MUR 3132
- 2) MUR 3432
- 3) MUR 3466
- 4) MUR 3495
- 5) MUR 3733

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

Attest:

7-20-94
Date

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

24043562404



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

August 2, 1994

Leslie Kerman, Esq.
Epstein Becker & Green
1227 25th Street, NW
Washington, DC 20037-1156

RE: MUR 3495
Simon for Senate Committee and
Edward T. Joyce, as treasurer

Dear Ms. Kerman:

On April 3, 1992, your clients were notified that the Federal Election Commission found reason to believe that the Simon for Senate Committee and Edward T. Joyce, as treasurer, violated 2 U.S.C. § 434(a)(6). On July 22, 1992, you submitted an initial response.

After considering the circumstances of this matter, the Commission exercised its prosecutorial discretion to take no further action against your clients. This case was evaluated objectively relative to other matters on the Commission's docket. In light of the information on the record, the relative significance of the case, and the amount of time that has elapsed, the Commission determined to close its file in this matter on August 1, 1994.

The confidentiality provisions of 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record prior to receipt of your additional materials, any permissible submissions will be added to the public record when received.

Ms. Leslie Kerman, Esq.
MUR 3495
Page 2

If you have any questions, please contact Joan McEnery at
(202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

24043562406



FEDERAL ELECTION COMMISSION

WASHINGTON D.C. 20461

THIS IS THE END OF MUR # 3495

DATE FILMED 8-30-84 JMK CAMERA NO. 2

CAMERAMAN JMK

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