



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 579





FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

August 9, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Elsie R. Olson
Treasurer, Anderson for
Congress Finance Committee
American National Bank
501 Seventh Street
P. O. Box 1537
Rockford, Illinois 61110

Re: MUR 579(78)

Dear Ms. Olson:

This letter is to notify you that the proper amendments to the Anderson for Congress Finance Committee were submitted to the Federal Election Commission. After reviewing these amendments, it appears that the matter has been rectified and the Commission will take no further action with regard to MUR 579(78). This investigation may now be considered to have ended.

Thank you for your cooperation.

Sincerely,

A handwritten signature in dark ink, appearing to read "William C. Oldaker", is written over a horizontal line.

William C. Oldaker
General Counsel

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Elsie R. Olson
Treasurer, Anderson for
Congress Finance Committee
American National Bank
501 Seventh Street
P. O. Box 1537
Rockford, Illinois 61110

Re: MUR 579(78)

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Thank you for your cooperation.

Sincerely,

William C. Oldaker
General Counsel

EH.

78040062705



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

August 9, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Norris Aldeen
920 Paris Avenue
Rockford, Illinois

Re: MUR 579(78)

Dear Mr. Aldeen:

This letter is to notify you that the proper amendments to the Anderson for Congress Finance Committee were submitted to the Federal Election Commission. After reviewing these amendments, it appears that the matter has been rectified and the Commission will take no further action with regard to MUR 579(78). This investigation may now be considered to have ended.

Thank you for your cooperation.

Sincerely,

A handwritten signature in cursive script, appearing to read "W. C. Oldaker", is written over a large, stylized circular flourish.

William C. Oldaker
General Counsel

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Morris Aldeen
920 Paris Avenue
Rockford, Illinois

Re: MUR 579(78)

Dear Mr. Aldeen:

This letter is to notify you that the proper amendments to the Anderson for Congress Finance Committee were submitted to the Federal Election Commission. After reviewing these amendments, it appears that the matter has been rectified and the Commission will take no further action with regard to MUR 579(78). This investigation may now be considered to have ended.

Thank you for your cooperation.

Sincerely,

William C. Oldaker
General Counsel

ET

78040062707

BEFORE THE FEDERAL ELECTION COMMISSION

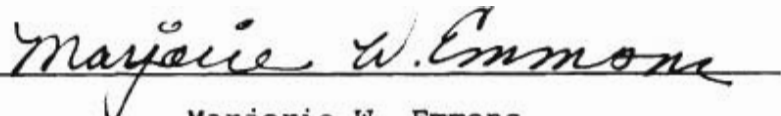
In the Matter of)
) MUR 579 (78)
Anderson for Congress)
Finance Committee)
Mr. Norris Aldeen)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on August 4, 1978, the Commission approved by a vote of 5-0 the following recommendations of the General Counsel in the above-captioned matter:

1. Accept the amended reports of the Anderson for Congress Finance Committee.
2. Take no further action with regard to this matter.
3. Close the file.
4. Send the letters attached to the General Counsel's Report, signed July 31, 1978.

Voting in this matter were Commissioners Springer, Harris, Tiernan, Staebler, and Thomson.



Marjorie W. Emmons
Secretary to the Commission

Date: August 4, 1978

Received in Office of Commission Secretary: 8-1-78, 3:52
Circulated on 48 hour vote basis: 8-2-78, 12:00

78040062708

August 1, 1958

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 579

Please have the attached General Counsel's Report on MUR 579 distributed to the Commission on a 48 hour tally basis.

Thank you.

78040062709

BEFORE THE FEDERAL ELECTION COMMISSION

July 28, 1978

In the Matter of)
) MUR 579 (78)
Anderson for Congress Finance Committee)
Mr. Norris Aldeen)

GENERAL COUNSEL'S REPORT

Background

On April 13, 1978 Reports Analysis referred to the Office of the General Counsel the names of Mr. Norris Aldeen, Chairman of the Anderson for Congress Finance Committee, and twelve other individuals who may have made in-kind contributions on behalf of the candidate John Anderson, in violation of 2 U.S.C. §441a(a)(f)(B)(i). In addition, it appeared that Mr. Aldeen may have exceeded the contribution limitation of \$1,000 per candidate/per election in violation of 2 U.S.C. §441a(a)(1)(A), and that the Committee may have knowingly accepted the above mentioned in-kind contributions in violation of 2 U.S.C. §441a(f). On June 7, 1978 the Commission found Reason to Believe that certain violations of the Act had occurred. The respondents were then notified of the Commission's findings by letter.

Analysis

On July 3, 1978 the Commission received a response to its notification letter from Elsie R. Olson, Treasurer of the Anderson for Congress Finance Committee. Included with Ms. Olson's letter were two amended reports for the Anderson for Congress Committee, one for the April 10 Quarterly Report and one for the 30 day Post Primary Report. The reports which Ms. Olson submitted were amended so as to include as contributions to the Committee those expenditures which were originally reported by Mr. John Glynn to the Commission as independent expenditures.

Additionally, Ms. Olson submitted a photocopy of a check made out to John Glynn by Mrs. Norris A. Aldeen for the amount of \$1,000. Ms. Olson explained that the check, originally attributed to Mr. Norris Aldeen, in the amount of \$1,000 was in fact contributed by Mrs. Norris Aldeen from her own checking account. Therefore, Mr. Aldeen did not exceed the contribution limitations of 2 U.S.C. §441a(a)(1) (A) as he only gave \$600 in 1977.

Recommendations

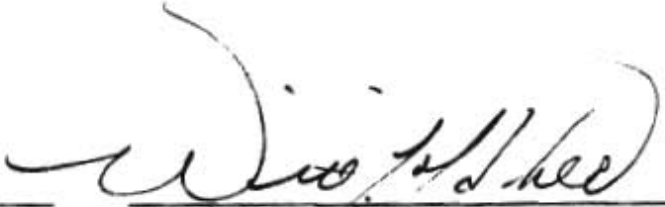
As the Committee has submitted amended reports to reflect the independent expenditures as contributions received by the Committee, and as Mr. Norris Aldeen did not exceed the

contribution limits of 2 U.S.C. §441a(a)(1)(A), we recommend:

- (1) the the Commission accept the amended reports of the Anderson for Congress Finance Committee,
- (2) that the Commission take no further action with regard to this matter,
- (3) that the file be closed, and
- (4) send the attached letters.

DATE

7/31/78


William C. Oldaker
General Counsel

78040062712



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Norris Aldeen
920 Paris Avenue
Rockford, Illinois

Re: MUR 579(78)

Dear Mr. Aldeen:

This letter is to notify you that the proper amendments to the Anderson for Congress Finance Committee were submitted to the Federal Election Commission. After reviewing these amendments, it appears that the matter has been rectified and the Commission will take no further action with regard to MUR 579(78). This investigation may now be considered to have ended.

Thank you for your cooperation.

Sincerely,

William C. Oldaker
General Counsel



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Elsie R. Olson
Treasurer, Anderson for
Congress Finance Committee
American National Bank
501 Seventh Street
P. O. Box 1537
Rockford, Illinois 61110

Re: MUR 579(78)

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Thank you for your cooperation.

Sincerely,

William C. Oldaker
General Counsel

GRANT AND SILVERMAN
CERTIFIED PUBLIC ACCOUNTANTS

RECEIVED
FEDERAL ELECTION
COMMISSION

JAY IRVING GRANT, C.P.A.
1950-1955
ISADORE SILVERMAN, C.P.A.
HARRY L. SILVERMAN, C.P.A.
LAWRENCE DAVIDSON, C.P.A.
WILLIAM S. WEAVER, C.P.A.

msa 579 600#4389
78 AUG 7 PM 12:48
111 CIVIC CENTER DRIVE
SUITE 112
SOUTHFIELD, MICH. 48076
(313) 358-4121

August 1, 1978

Federal Election Commission
1325 K. Street N.W.
Washington, D.C. 20463

805106

Attention: Ms. Elizabeth Huber

Re: Austin for Senate

Dear Ms. Huber:

Per our conversation I am enclosing copy of Mr. Austin's personal check to 'Austin For Senate.' Also enclosed is final invoice from MG & Casey, Inc., which also includes Broadcast News Service. This bill was paid on January 22, 1976.

Please call me if you have any further questions.

Very truly yours,

Lawrence Davidson

LAWRENCE DAVIDSON, C.P.A.
GRANT AND SILVERMAN
Certified Public Accountants

LD/ml

78040062715



20141 James Couzens
Detroit, Michigan 48235
Phone: 864-2009

Nº 12750

DATE June 22, 1976

Austin for Senate
P.O. Box 35407
Seven Oaks Station
Detroit, Michigan 48235

130,000 - 4 page issue folder, 2 color, 11X17

Layout, art, type, keyline, print and fold

\$3,173.20

Sales Tax

126.93

Total

\$3,300.13

TERMS: NET 30 DAYS. 1% MONTHLY SERVICE CHARGE OVER 30 DAYS.

7 3 0 4 0 0 6 2 7 1 5

78040062717

RICHARD H. AUSTIN
SECRETARY OF STATE
TREASURY BUILDING
LANSING, MICH. 48918

1077

PAY
TO THE
ORDER OF

Austin for Senate

Dec 31, 1976 $\frac{74-1174}{724}$
\$4,000.00

Four Thousand and No/100 $\frac{74-1174}{724}$ DOLLARS



MICHIGAN NATIONAL BANK
OF LANSING
LANSING, MICHIGAN 48904

Richard H. Austin

⑆0724⑆1174⑆

309⑆092⑆8⑆

⑆0000400000⑆

73040062713

PAY TO THE ORDER OF
MICHIGAN NATIONAL BANK
OF DETROIT
DETROIT, MICHIGAN
AUSTIN FOR SENATE
0071-2282-0

PAY TO THE ORDER OF
MICHIGAN NATIONAL BANK
OF DETROIT
DETROIT, MICHIGAN
AUSTIN FOR SENATE
0071-2282-3

MICHIGAN NATIONAL BANK
DETROIT, MICHIGAN
JAN 3 1977

077 077

077 077
JAN 3 1977

GRANT AND SILVERMAN

CERTIFIED PUBLIC ACCOUNTANTS

21411 CIVIC CENTER DRIVE

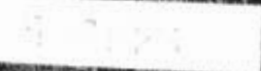
SUITE 112

SOUTHFIELD, MICHIGAN 48076

FEDERAL ELECTION
COMMISSION

AUG 7 PM 12:46

CERTIFIED

No. 

MAIL

Federal Election Commission
1325 K. Street N.W.
Washington, D.C. 20463

**RETURN RECEIPT
REQUESTED**

Attention: Ms. Elizabeth Huber

JUN 9 1978



FEDERAL ELECTION COMMISSION

1325 K STREET NW
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Norris Aldeen
930 Paris Avenue
Rockford, Illinois

Re: MUR 579 (78)

Dear Mr. Aldeen:

78040652720

This letter is to notify you that during the normal course of examining campaign records, we noticed that you may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). The Commission has subsequently found reason to believe that you may have violated 2 U.S.C. §434(b) and 2 U.S.C. §441a(a)(1)(A). The violations pertain to a report of Independent Expenditures or contributions signed by John W. Glynn on March 31, 1978. On this report you and twelve other individuals are listed as having made independent contributions for newspaper advertising, on March 18 and 20, 1978, on behalf of the candidate John Baynard Anderson. However, as you are the Chairman of Anderson's principal campaign committee, the Anderson for Congress Finance Committee, it appears that these contributions may not be considered as independent of the committee but, in fact, must be in-kind contributions. The Commission has further clarified 2 U.S.C. §441a(a)(7)(B)(i) in its regulations, 11 C.F.R. 109.1(b)(4)(i)(B). Independent expenditures may not be: "Made by or through any person who is, or has been, authorized to raise or expend funds, who is, or has been, an officer of an authorized committee, or who is, or has been, receiving any form of compensation or reimbursement from the candidate, the candidate's committee or agent." Here a possible violation of 2 U.S.C. §434(b) may have occurred. In addition, if one adds the \$1,000 you contributed on March 18 and 20, 1978 to the \$600 you contributed on September 20 and November 1, 1977 towards Mr. Anderson's primary, you have exceeded the \$1,000 per candidate/per election limitation by \$600. The Illinois primary for which the candidate Anderson ran was held on March 21, 1978, after the aggregate \$1,600 contributions had been collected. It appears, therefore, that you exceeded the \$1,000 limitation laid forth in 2 U.S.C.

Page 2
Letter to Mr. Norris Aldeen
Re: MUR 579 (78)

§441a(a)(1)(A).

In order to correct the issues raised by our examination, you should submit a letter of amendment to the Anderson for Congress Finance Committee and you should also seek a reimbursement of \$600 from the committee. After this has been accomplished, the Federal Election Commission must be notified of the corrections.

If you have any questions, please contact Elizabeth Huber (telephone no. 202/523-4529), the staff member assigned to this matter.

Sincerely yours,

William C. Oldaker
William C. Oldaker
General Counsel

PS Form 3811, Apr. 1977

MUR 579 EH

00

78

00

1. The following service is requested (check one).
☒ Show to whom and date delivered.
☐ Show to whom, date, and address of delivery.
☐ RESTRICTED DELIVERY.
☐ Show to whom and date delivered.
☐ RESTRICTED DELIVERY.
☐ Show to whom, date, and address of delivery. \$
(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Norris Aldeen
930 Paris Ave,
Rockford, Ill.

3. ARTICLE DESCRIPTION:
REGISTERED NO. CERTIFIED NO. INSURED NO.
943087

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☒ Addressee ☐ Authorized agent
Mrs. Norris Aldeen

4. DATE OF DELIVERY
6-15-78

5. ADDRESS (Complete only if requested)
930 Paris

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS
Q.S.

POSTMARK
JUN 15 1978
ROCKFORD, ILL.

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

GPO : 1977-O-234-337

JUN 9 1978



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Elsie R. Olson
Treasurer
Anderson for Congress Finance Committee
American National Bank
501 Seventh Street, P.O. Box 1537
Rockford, Illinois 61110

Re: MUR 579 (78)

Dear Ms. Olson:

This letter is to notify you that during the normal course of examining campaign records, we noticed that the Anderson for Congress Finance Committee may have violated the Federal Election Campaign Act of 1971, as amended. The Commission has subsequently found reason to believe that you may have violated 2 U.S.C. §441a(f). The violation pertains to a report of Independent Expenditures or Contributions signed by John W. Glynn on March 31, 1978. On this report Mr. Norris Aldeen, Chairman of the Anderson for Congress Finance Committee, and twelve other individuals are listed as having made independent contributions for newspaper advertising, on March 18 and 20, 1978, on behalf of the candidate John Baynard Anderson. However, as Mr. Aldeen is the Chairman of Anderson's principal campaign committee, these contributions may not be considered as independent of the committee but, in fact, must be in-kind contributions. The Commission has further clarified 2 U.S.C. §441a(a)(7)(B)(i) in its regulations, 11 C.F.R. 109.1(b)(4)(i)(B). Independent expenditures may not be: "Made by or through any person who is, or has been, authorized to raise or expend funds, who is, or has been, an officer of an authorized committee, or who is, or has been, receiving any form of compensation or reimbursement from the candidate, the candidate's committee or agent." In addition if one adds the \$1,000 Mr. Aldeen contributed on March 18 and 20, 1978, to the \$600 he contributed on September 20 and November 1, 1977 towards Mr. Anderson's primary, he has exceeded the \$1,000 per candidate/per election limitation by \$600. The Illinois primary for which the candidate Anderson ran was

Page 2
Letter to Ms. Elsie Olson
Re: MUR 579 (78)

held on March 21, 1978, after the aggregate \$1,600 contributions had been collected from Mr. Aldeen. It appears, therefore, that Aldeen exceeded the \$1,000 limitation set forth in 2 U.S.C. §441a(a)(1)(A). Finally, pursuant to 2 U.S.C. §441a(f): "No candidate or political committee shall knowingly accept any contribution or make any expenditure in violation of the provisions of this section. No officer or employee of a political committee shall knowingly accept a contribution made for the benefit or use of a candidate, or knowingly make any expenditure on behalf of a candidate, in violation of any limitation imposed on contributions and expenditures under this section." In accepting the aggregate \$1,600, it appears the Anderson for Congress Finance Committee has knowingly violated 2 U.S.C. §441a(f).

In order to correct the issues raised by our examination, the Anderson for Congress Finance Committee should submit a letter of amendment to the Clerk of the House. Mr. Aldeen and those twelve who contributed with him in March 1978 should be listed on the Committee's records of itemized receipts as their contributions all exceed \$100. In addition, Mr. Aldeen should be reimbursed for the extra \$600 he contributed to Mr. Anderson's campaign. After this has been accomplished the Federal Election Commission must be notified of the corrections.

If you have any questions, please contact Elizabeth Huber (telephone no. 202/523-4529), the staff member assigned to this matter.

Sincerely yours,

William C. Oldaker
William C. Oldaker
General Counsel

MUR 579 EH

● SENDER: Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one):
☐ Show to whom and date delivered.
☒ Show to whom, date, and address of delivery.
☐ RESTRICTED DELIVERY
☐ Show to whom and date delivered.
☐ RESTRICTED DELIVERY.
Show to whom, date, and address of delivery: \$
(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Ms. Elsie Olson, Treasurer
Anderson for Congress Fin. Comm.
P.O. Box 1000
501 7th St, Rockford, Ill

3. ARTICLE DESCRIPTION: 61112
REGISTERED NO. 94308 INSURED NO. 61112

(Always obtain signature of addressee or agent)

I have received the article described above:
SIGNATURE ☒ Addressee ☐ Authorized agent
Samuel J. Oldaker

4. DATE OF DELIVERY: 6-15-78

5. ADDRESS (Complete only if requested):
POSTMARK: JUN 15 1978
USP

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

PS Form 3811, Apr. 1977 RETURN RECEIPT, REGISTERED

E.W.
6/8

CERTIFIED MAIL
RETURN REQUEST REQUESTED

Ms. Elsie R. Olson
Treasurer
Anderson for Congress Finance Committee
American National Bank
501 Seventh Street, P.O. Box 1537
Rockford, Illinois 61110

Re: MUR 579 (78)

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78040062724

Page 2
Letter to Ms. Elsie Olson
Re: MUR 579 (78)

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If you have any questions, please contact Elizabeth Huber (telephone no. 202/523-5529), the staff member assigned to this matter.

Sincerely yours,

William C. Oldaker
General Counsel

78040062725

E.H.
6/8

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Norris Alden
930 Paris Avenue
Rockford, Illinois

Re: MUR 5798(78)

Dear Mr. Alden:

7 8 0 4 0 0 6 2 7 2 6

This letter is to notify you that during the normal course of examining campaign records, we noticed that you may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). The Commission has subsequently found reason to believe that you may have violated 2 U.S.C. §434(b) and 2 U.S.C. §441a(a)(2)(A). The violations pertain to a report of Independent Expenditures or contributions signed by John W. Glynn on March 31, 1978. On this report you and twelve other individuals are listed as having made independent contributions for newspaper advertising, on March 18 and 20, 1978, on behalf of the candidate John Baynard Anderson. However, as you are the Chairman of Anderson's principal campaign committee, the Anderson for Congress Finance Committee, it appears that these contributions may not be considered as independent of the committee but, in fact, must be in-kind contributions. The Commission has further clarified 2 U.S.C. §441a(a)(7)(B)(i) in its regulations, 11 C.F.R. 109.1(b)(4)(i)(B). Independent expenditures may not be: "Made by or through any person who is, or has been, authorized to raise or expend funds, who is, or has been, an officer of an authorized committee, or who is, or has been, receiving any form of compensation or reimbursement from the candidate, the candidate's committee or agent." Here a possible violation of 2 U.S.C. §434(b) may have occurred. In addition, if one adds the \$1,000 you contributed on March 18 and 20, 1978 to the \$600 you contributed on September 20 and November 1, 1977 towards Mr. Anderson's primary, you have exceeded the \$1,000 per candidate/per election limitation by \$600. The Illinois primary for which the candidate Anderson ran was held on March 21, 1978, after the aggregate \$1,600 contributions had been collected. It appears, therefore, that you exceeded the \$1,000 limitation laid forth in 2 U.S.C.

Page 2
Letter to Mr. Morris Aldeen
Re: MUR 579 (78)

§441a(a)(1)(A).

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If you have any questions, please contact Elisabeth Huber (telephone no. 202/523-4529), the staff member assigned to this matter.

Sincerely yours,

William C. Oldaker
General Counsel

78040062727

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Anderson for Congress Finance Committee
Mr. Norris Aldeen

MUR 579 (78)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on June 7, 1978, the Commission approved by a vote of 5-0 the recommendations in the First General Counsel's Report dated June 2, 1978 to take the following actions in the above-captioned matter:

1. With regard to the 2 U.S.C. §434(b) question, it is recommended that the Commission find reason to believe a violation has occurred and send the letter attached to the report requesting respondent Norris Aldeen to amend the reported independent contributions on FEC Form 5 to regular contributions.
2. With regard to the 2 U.S.C. §441a(a)(1)(A) question, it is recommended that reason to believe be found that a violation has occurred and send the letter attached to the report requesting respondent Norris Aldeen to seek the reimbursement for the extra \$600 be contributed to the candidate John B. Anderson.
3. With regard to the 2 U.S.C. §441a(f) question, it is recommended that reason to believe be found that a violation has occurred and send the letter attached to the report requesting respondent Anderson for Congress Finance Committee to amend their reports and include the reported independent contributions on the committee's regular FEC Form 3. (Receipts, etc.)

Commissioners Aikens, Tiernan, Thomson, Harris and Staebler returned their votes by the deadline.

Date:

June 7, 1978

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

78010062728

June 2, 1978

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 579

Please have the attached 7 day report on MUR 579 distributed to the Commission on a 48 hour tally basis.

Thank you.

78040062729

FEDERAL ELECTION COMMISSION
1325 K Street, N.W.
Washington, D.C. 20463

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION JUN 2 1978

MUR # 579(78)
DATE COMPLAINT RECEIVED
BY OGC 04-13-78

STAFF MEMBER Huber

COMPLAINANT'S NAME: Internally Generated -- Referral from Analyst Mike Filler
and Team Chief Peter Kell of Disclosure.

RESPONDENT'S NAME: Anderson for Congress Finance Committee,
Mr. Norris Aldeen

RELEVANT STATUTE: 2 U.S.C. § 434 (b)
2 U.S.C. § 441a(a)(7)(B)(i) and 11 C.F.R. 109.1(b)(4)(i)(B)
2 U.S.C. § 441a(a)(1)(A), and,
2 U.S.C. § 441a(f)

INTERNAL REPORTS CHECKED: All 1977 and 1978 reports filed by the Anderson
for Congress Committee, and all independent expenditure or contribution
reports (FEC Form 5) filed re: the above committee.

FEDERAL AGENCIES CHECKED:
None

SUMMARY OF ALLEGATIONS

- 1) Respondent Norris Aldeen, Chairman of the Anderson for Congress Finance Committee and twelve others may have made in-kind contributions on behalf of the candidate John Baynard Anderson. See 2 U.S.C. § 441a(a)(7)(B)(i) and 11 C.F.R. 109.1(b)(4)(i)(B). If this is true the contributions have been misreported in violation of §434(6).
- 2) Respondent Norris Aldeen exceeded the contribution limitation of \$1,000 per candidate/per election by contributing in the aggregate \$1,600 to the primary of John Baynard Anderson, in violation of 2 U.S.C. §441a(a)(1)(A).
- 3) Respondent Anderson for Congress Finance Committee knowingly accepted the above mentioned in-kind contributions of Norris Aldeen in violation of 2 U.S.C. §441a(f).

PRELIMINARY LEGAL ANALYSIS

- 1) A report of independent expenditures or contributions (FEC Form 5) filed by John W. Glynn on March 31, 1978 lists the following contributions, all dated March 18 and 20, 1978: Mr. Norris Aldeen \$1,000, Mrs. John W. Glynn \$500, Mrs. Benjamin Behr \$500, Mr. Benjamin Behr \$500, Mr. Daniel Greenwood \$200, Mr. Louis D. Clay \$200, Mr. Walt Smith \$200, Mr. Dan J. Nicholas \$200, Mr. Daniel Nielsen \$200, Mr. and Mrs. Arthur Wilcox \$200, and, Mr. and Mrs. Bengt Sjostrom \$200. These sums are reported as independent contributions made for newspaper advertising on behalf of the candidate John B. Anderson. However, the principal contributor, Mr. Norris Aldeen is

also the Chairman of the Anderson for Congress Finance Committee, John B. Anderson's principal campaign committee. It appears, therefore, that these sums may in fact have been in-kind contributions and not independent contributions, as reported.

Under the definition of independent expenditures, an officer of an authorized committee may not make independent expenditures on behalf of the candidate he supports. [See 11 C.F.R. 109.1(b)(4)(i)(B)]. In addition, pursuant to 2 U.S.C. § 441a(a)(7)(B)(i): "...expenditures made by any person in cooperation, consultation, or concert, with, or at the request of suggestion of, a candidate, his authorized political committees, or their agents, shall be considered to be a contribution to such candidate." Since respondent Aldeen and the twelve others gave, on the same dates, monies for advertising on behalf of their candidate Anderson, it appears their actions were not independent but may actually have been in cooperation with the committee, through the Chairman Aldeen.

2) Respondent Norris Alden contributed \$500 on 09-20-77 and \$100 on 11-01-77. This sum of \$600, added to the \$1,000 in-kind contribution of March 18 and 20, 1978 (see discussion above), makes an aggregate of \$1,600. The Illinois primary for which the candidate Anderson ran was held on March 21, 1978, after all of the above mentioned contributions had been collected. It appears, therefore, that respondent exceeded the \$1,000 per candidate/per election limit of \$1,000 and in so doing violated 2 U.S.C. §441a(a)(1)(A).

3) Respondent Anderson for Congress Finance Committee may have knowingly accepted the above mentioned in-kind \$1,000 contribution from respondent Norris Aldeen. This \$1,000, when combined with the \$600 already contributed for the candidate's Illinois primary, exceeds the contribution limitation by \$600. In accepting these sums the committee has violated 2 U.S.C. §441a(f).

RECOMMENDATION

1) With regard to the 2 U.S.C. §434(b) question, it is recommended that the Commission find reason to believe a violation has occurred and send the attached letter requesting respondent Norris Aldeen to amend the reported independent contributions on FEC Form 5 to regular contributions.

2) With regard to the 2 U.S.C. §441a(a)(1)(A) question, it is recommended that the Commission find reason to believe a violation has occurred and send the attached letter requesting

MUR 579
Huber

respondent Norris Aldeen to seek the reimbursement for the extra \$600 he contributed to the candidate John B. Anderson.

3) With regard to the 2 U.S.C. §441a(f) question it is recommended that the Commission find reason to believe a violation has occurred and send the attached letter requesting respondent Anderson for Congress Finance Committee to amend their reports and include the reported independent contributions on the committee's regular FEC Form 3. (Receipts, etc.)

7 8 0 4 0 0 6 2 7 3 2



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Elsie R. Olson
Treasurer
Anderson for Congress Finance
Committee
American National Bank
501 Seventh Street,
P.O. Box 1537
Rockford, Illinois 61110

Re: MUR 579(78)

Dear Ms. Olson:

This letter is to notify you that during the normal course of examining campaign records, we noticed that the Anderson for Congress Finance Committee may have violated the Federal Election Campaign Act of 1971, as amended. The violation pertains to a report of Independent Expenditures or Contributions signed by John W. Glynn on March 31, 1978. On this report Mr. Norris Aldeen, Chairman of the Anderson for Congress Finance Committee, and twelve other individuals are listed as having made independent contributions for newspaper advertising, on March 18 and 20, 1978, on behalf of the candidate John Baynard Anderson. However, as Mr. Aldeen is the Chairman of Anderson's principal campaign committee, these contributions may not be considered as independent of the committee but, in fact, must be in-kind contributions. The Commission has further clarified 2 U.S.C. §441a(a)(7)(B)(i) in its regulations, 11 C.F.R. 109.1(b)(4)(i)(B). Independent expenditures may not be: "Made by or through any person who is, or has been, authorized to raise or expend funds, who is, or has been, an officer of an authorized committee, or who is, or has been, receiving any form of compensation or reimbursement from the candidate, the candidate's committee or agent." In addition, if one adds the \$1,000 Mr. Aldeen contributed on March 13 and 20, 1978, to the \$600 he contributed on September 20 and November 1, 1977 towards Mr. Anderson's primary, he has exceeded the \$1,000 per candidate/per election limitation by \$600. The Illinois primary for which the candidate Anderson ran was held on March 21, 1978, after



78040062733

Page 2
Letter to Ms. Elsie Olson
Re: MUR 579(78)

the aggregate \$1,600 contributions had been collected from Mr. Aldeen. It appears, therefore, that Aldeen exceeded the \$1,000 limitation set forth in 2 U.S.C. §441a(a)(1)(A). Finally, pursuant to 2 U.S.C. §441a(f): "No candidate or political committee shall knowingly accept any contribution or make any expenditure in violation of the provisions of this section. No officer or employee of a political committee shall knowingly accept a contribution made for the benefit or use of a candidate, or knowingly make any expenditure on behalf of a candidate, in violation of any limitation imposed on contributions and expenditures under this section". In accepting the aggregate \$1,600, it appears the Anderson for Congress Finance Committee has knowingly violated 2 U.S.C. §441a(f).

In order to correct the issues raised by our examination, the Anderson for Congress Finance Committee should submit a letter of amendment to the Clerk of the House. Mr. Aldeen and those twelve who contributed with him in March 1978 should be listed on the Committee's records of itemized receipts as their contributions all exceed \$100. In addition, Mr. Aldeen should be reimbursed for the extra \$600 he contributed to Mr. Anderson's campaign. After this has been accomplished the Federal Election Commission must be notified of the corrections.

If you have any questions, please contact Elizabeth Huber (telephone no. 202/523-4529), the staff member assigned to this matter.

Sincerely yours,

William C. Oldaker
General Counsel

73040962754



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Norris Aldeen
930 Paris Avenue
Rockford, Illinois

Re: MUR 579 (78)

Dear Mr. Aldeen:

This letter is to notify you that during the normal course of examining campaign records, we noticed that you may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). The violations pertain to a report of Independent Expenditures or Contributions signed by John W. Glynn on March 31, 1978. On this report you and twelve other individuals are listed as having made independent contributions for newspaper advertising, on March 18 and 20, 1978, on behalf of the candidate John Baynard Anderson. However, as you are the Chairman of Anderson's principal campaign committee, The Anderson for Congress Finance Committee, it appears that these contributions may not be considered as independent of the committee but, in fact, must be in-kind contributions. The Commission has 2 U.S.C. §441a(a)(7)(B)(i) in its regulations, 11 C.F.R. 109.1 (b)(4)(i)(B). Independent expenditures may not be: "Made by or through any person who is, or has been authorized to raise or expend funds, who is, or has been, an officer of an authorized committee, or who is, or has been, receiving any form of compensation or reimbursement from the candidate, The candidate's committee or agent." In addition, if one adds the \$1,000 you contributed on March 18 and 20, 1978 to the \$600 you contributed on September 20 and November 1, 1977 towards Mr. Anderson's primary, you have exceeded the \$1,000 per candidate/per election limitation by \$600. The Illinois primary for which the candidate Anderson ran was held on March 21, 1978, after the aggregate \$1,600 contributions had been collected. It appears, therefore, that you exceeded the \$1,000 limitation laid forth in 2 U.S.C. §441a(a)(1)(A).



Page 2
Letter to Norris Aldeen
Re: MUR 579(78)

In order to correct the issues raised by our examination, you should submit a letter of amendment to the Anderson for Congress Finance Committee and you should also seek a reimbursement of \$600 from the committee. After this has been accomplished, the Federal Election Commission must be notified of the corrections.

If you have any questions, please contact Elizabeth Huber (telephone no. 202/523-4529), the staff member assigned to this matter.

Sincerely yours,

William C. Oldaker
General Counsel

7 3 0 4 0 7 6 2 7 3 6

Date April 13, 1978

Anal Mike Filler

Team Chief Peter Kell, Jr.

TO: General Counsel

Compliance Review CB

THROUGH: Staff Director ASD

FROM: Assistant Staff Director for Reports Analysis Don Haulton

DESCRIPTION:

Independent Expenditure

Candidate/Committee NORRIS ALDEEN-Chairman, Anderson for Congress Finance Cmte.

Report filed by:

Treasurer John W. Glynn

Address 4450 Tullock's Woods Trail, Rockford, Illinois 61103

REPORTS: (For reports reviewed, amendments, REAI's, etc, see indices, Attachment 1) Not applicable.

Period Covered from 30 Day Post Primary-Ill. to

Independent Contributions

Total Receipts \$ 5670.

Independent

Total Expenditures \$ 5670.

Cash on Hand \$

Debts \$

REASON(S) FOR REFERRAL:

<u>Allegation(s)</u>	<u>Cite</u>	<u>Attachment</u>
Agent of Anderson for Congress Finance Committee		
making independent expenditures.	11 CFR 109.1(b)(4)(i)(B)	FORM 5-#1
		FORM 1-#2

HISTORY.

An independent expenditure report(FORM 5) filed by John W. Glynn listed several individuals making independent contributions--two being from Norris Aldeen, chairman of the Anderson for Congress Finance Committee. 11 CFR 109.1(b)(4)(i)(B) prohibits independent expenditures by agents of the candidate's committee.

Attachment #3 shows that Mr. Aldeen has also contributed \$600 in Primary and \$1000 for the General election.

Requests for Additional Information will be sent to John Glynn and the other individuals itemized on the FORM 5 (excluding Mr. Aldeen), in order that these individuals can properly disclose independent expenditures/contributions according to the Commission's decision of April 6, 1978.

There has been no communication with Mr. Glynn or Mr. Aldeen.

RAD File # SL-27

78040062737

78040062733

Election Commission
Wash., D.C. 20463
(See reverse side)

EXPENDITURES OR CONTRIBUTIONS BY PERSONS

Every person (other than a political committee or candidate) who makes contributions or expenditures for communications which expressly advocate the election or defeat of a clearly identified candidate for federal office, shall file this report. (See reverse side). POLITICAL COMMITTEES do NOT file Reports of Receipts and Expenditures on FEC Form 5. Political committees file Reports on FEC Form 3.

Name of person (in full)
John W. Glynn

Address (Number & Street)
150 Tullock's Woods Trail
City, State & Zip Code
Rockford, IL 61103

2 This is a Report of
☐ Independent Expenditures
☒ Independent Contributions
☐ Both

Type of Report (check appropriate box)
☐ April 10 ☐ October 10 ☐ Amendment to _____ Report
☐ July 10 ☐ January 31 ☐ election on _____ (date) in the state of _____
☐ Tenth day report preceding _____ election on 3/21 in the state of Illinois
☒ Thirtieth day report following _____ election on _____ (date) in the state of _____
(primary, general or convention) (primary, general or convention)

Make expenditures and contributions which exceed, in the aggregate, \$100 within a calendar year.

Full Name, Mailing Address & Zip Code of Each Payee	Purpose of Expenditure/Contribution	Date (month, day, year)	Amount	Name of Federal Candidate advocated by the Expenditure/Contribution
Expenditure to ☐ Contribution to Mrs. John W. (Alice) Glynn 150 Tullock's Woods Trail Rockford, IL 61103	Newspaper advertising	3/18 & 3/20	\$500	John B. Anderson
Expenditure to ☐ Contribution to Mrs. Benjamin (Jeane) Behr 2710 Rural Rockford, IL 61107	ditto	ditto	\$500	ditto
Expenditure to ☐ Contribution to Mr. Benjamin Behr 2710 Rural Rockford, IL 61107	ditto	ditto	\$500	ditto
Expenditure to ☐ Contribution to Mr. Daniel B. Greenwood 3828 Spring Creek Road Rockford, IL 61107	ditto	ditto	\$200	ditto

(c) Subtotal of Itemized Expenditures and/or Contributions.....\$
(c) Subtotal of Unitemized Expenditures and/or Contributions.....\$
(d) Total Expenditures and/or Contributions.....\$

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

John W. Glynn (Signature) 3/21/78 (Date)

Form 5
1976
Federal Election Commission
Washington, D.C. 20463

(Instructions on reverse side)

REPORT OF INDEPENDENT
EXPENDITURES OR CONTRIBUTIONS
BY PERSONS

Page 2 of 3

Note: Every person (other than a political committee or candidate) who makes contributions or expenditures for communications which expressly advocate the election or defeat of a clearly identified candidate for federal office, other than by contribution to a political committee or candidate, in an aggregate amount in excess of \$100 within a calendar year must file this Report. (See reverse side). POLITICAL COMMITTEES do NOT file Reports of Receipts and Expenditures on FEC Form 5. Political committees file Reports on FEC Form 3.

1(a) Name of Person (in full)

John W. Glynn

(b) Address (Number & Street)

4450 Tullock's Woods Trail

(c) City, State & Zip Code

Rockford, IL 61103

2 This is a Report of

☐ Independent Expenditures

☒ Independent Contributions

☐ Both

3 Type of Report (check appropriate box)

☐ April 10

☐ October 10

☐ Amendment to _____ Report

☐ July 10

☐ January 31

☐ Tenth day report preceding

(primary, general or convention)

election on _____ in the state of _____

(date)

☒ Thirtieth day report following

(primary, general or convention)

election on 3/21 in the state of Illinois

(date)

4 Itemize expenditures and contributions which exceed, in the aggregate, \$100 within a calendar year.

Full Name, Mailing Address & Zip Code of Each Payee	Purpose of Expenditure/Contribution	Date (month, day, year)	Amount	Name of Federal Candidate advocated by the Expenditure/Contribution
☐ Expenditure to ☐ Contribution to Mr. Norris Aldeen 930 Paris Avenue Rockford, IL 61107	Newspaper advertising	3/18 & 3/20	\$1,000	John B. Anderson
☐ Expenditure to ☐ Contribution to Mr. Louis D. Clay 913 North Main Rockford, IL 61103	ditto	ditto	\$200	ditto
☐ Expenditure to ☐ Contribution to Mr. Walt Smith 1031 Nassau Parkway Rockford, IL 61111	ditto	ditto	\$200	ditto
☐ Expenditure to ☐ Contribution to Mr. Dan J. Nicholas 2618 Harlem Blvd. Rockford, IL 61103	ditto	ditto	\$200	ditto

(b) Subtotal of Itemized Expenditures and/or Contributions.....\$

(c) Subtotal of Unitemized Expenditures and/or Contributions.....\$

(d) Total Expenditures and/or Contributions.....\$

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

(Signature)

(Date)

78040062740

Form 5
1978
Federal Election Commission
1100 K Street, N.W.
Washington, D.C. 20463

(Instructions on reverse side)

REPORT OF INDEPENDENT EXPENDITURES OR CONTRIBUTIONS BY PERSONS

Page 3 of 3

Note: Every person (other than a political committee or candidate) who makes contributions or expenditures for communications which expressly advocate the election or defeat of a clearly identified candidate for federal office, other than by contribution to a political committee or candidate, in an aggregate amount in excess of \$100 within a calendar year must file this Report. (See reverse side). POLITICAL COMMITTEES do NOT file Reports of Receipts and Expenditures on FEC Form 5. Political committees file Reports on FEC Form 3.

1(a) Name of Person (in full)

John W. Glynn

(b) Address (Number & Street)

4450 Tullock's Woods Trail

(c) City, State & Zip Code

Rockford, IL 61103

2 This is a Report of

- ☐ Independent Expenditures
☒ Independent Contributions
☐ Both

3 Type of Report (Check appropriate box)

- ☐ April 10
☐ July 10
☐ Tenth day report preceding

☐ Amendment to _____ Report

election on _____ in the state of _____

☒ Thirtieth day report following

(primary, general or convention)

Primary

election on 3/21/78 in the state of Illinois

(primary, general or convention)

4 I enclose expenditures and contributions which exceed, in the aggregate, \$100 within a calendar year.

Full Name, Mailing Address & Zip Code of Each Payee	Purpose of Expenditure/Contribution	Date (month, day, year)	Amount	Name of Federal Candidate advocated by the Expenditure/Contribution
☒ Expenditure to Mr. Daniel Nielsen 5047 Crofton Dr. Rockford, IL 61111	☐ Contribution to Newspaper advertising	3/18 & 3/20	\$200	John B. Anderson
☒ Expenditure to Mr. & Mrs. Arthur Wilcox 1907 Edgebrook Rockford, IL 61107	☐ Contribution to ditto	ditto	\$200	ditto
☒ Expenditure to Mr. & Mrs. Bengt Sjostrom 1806 Birchwood Drive Rockford, IL 61111	☐ Contribution to ditto	ditto	\$200	ditto
☐ Expenditure to	☐ Contribution to			

(b) Subtotal of Itemized Expenditures and/or Contributions.....\$3900

(c) Subtotal of Unitemized Expenditures and/or Contributions.....\$1770

(d) Total Expenditures and/or Contributions.....\$5670.00

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

(Signature)

(Date)

78040062741

77011261713

EC Form 1
July 1976
Federal Election Commission
1225 M Street, N.W.
Washington, D.C. 20543

Amended
RECEIVED

Statement of Organization For a Political Committee

Supporting any candidate(s) for federal office and anticipating contributions or expenditures in excess of \$1,000 in any calendar year in support of such candidate(s).

(See Reverse Side For Instructions.)

Receipt

1977

13 PM 11:22

Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with a campaign must maintain separate records with respect to each election.

1(a) Name of Committee (in full) ☐ Check if name or address is changed Anderson for Congress Finance Committee		2 Identification Number H.R. 00143 C00000802
(b) Address (number and street) American National Bank, 501 Seventh Street (P.O. Box 1537)		3 Date October 6, 1977
(c) City, State and ZIP code Rockford, Illinois 61110		4 Is this an amended statement? ☒ Yes ☐ No If "YES" fill in only those lines on which there has been a change.
5 Check one ☒ (a) This committee has been designated as the principal campaign committee for John Bayard Anderson (Name of Candidate) a candidate for U.S. House of Representatives in the 1978 Election (Federal office sought) (Year of election) to be held in the State of Illinois (State in which election is held) (THE PRINCIPAL CAMPAIGN COMMITTEE WILL FORWARD TO THE COMMISSION A COPY OF THE STATEMENT OF ORGANIZATION FOR EACH AFFILIATED COMMITTEE REQUIRED TO FILE WITH IT.) ☐ (b) This committee is supporting only one candidate, and is authorized by _____ (Name of Candidate) to receive contributions and make expenditures with respect to the _____ Election(s) (General, Primary, Runoff, etc.) held in _____, and will file all reports and statements with the candidate's principal campaign committee. (Year of election in State) (Full name of principal campaign committee) (ATTACH A COPY OF CANDIDATE'S WRITTEN AUTHORIZATION.) (SEE FORM 2a) ☐ (c) This committee supports only one candidate _____ but is not an authorized committee. (Name of Candidate) ☐ (d) This committee supports more than one Federal candidate and is not a party committee. ☐ (e) This committee is a _____ committee of the _____ Party. (National, State, county, city) (Democratic, Republican, etc.)		

6 Names of affiliated and/or connected organizations	Mailing address and ZIP code	Relationship

If the registering political committee has identified a "connected organization" above, please indicate type of organization:
☐ Corporation ☐ Labor organization ☐ Membership organization ☐ Trade association ☐ Cooperative
☐ Corporation without capital stock ☐ Other (please specify) _____

Submit additional information on separate continuation sheets appropriately labeled and attached to this Statement of Organization. Indicate in the appropriate section above when information is contained on separate page(s).

78040062742

EC Form 1
July 1978
Federal Election Commission
525 M Street, N.W.
Washington, D.C. 20543

Statement of Organization For a Committee

(Page 2)

Name of Committee

7. Area, Scope and Jurisdiction of Committee

- (a) Will this committee operate in more than one State? ☐ Yes ☐ No
- (b) Will it operate on a statewide basis in one State? ☐ Yes ☐ No
- (c) Will it primarily support candidates seeking State or local office? ☐ Yes ☐ No
- (d) Will it support or does it anticipate supporting directly or indirectly, candidates for Federal office in excess of \$1,000 in a calendar year? ☐ Yes ☐ No

8. List by name, address, office sought, and party affiliation, any candidate for Federal office that this committee is supporting

Full name of candidate	Mailing address and ZIP code	Office sought	Party

9. List by name, address, office sought, and party affiliation, any candidate for any other public official that this committee is supporting (unless the committee is supporting the general ticket of a party as indicated in line 9c)

Full name of candidate	Mailing address and ZIP code	Office sought	Party

9. If this committee is supporting the entire ticket of a party, give name of party

10. Identify by name, address and date on, the person in possession of committee books and records

Full name	Mailing address and ZIP code	Date of creation

Submit additional information on separate contribution sheet separately labeled and attached to the Statement of Organization, indicate in the statement the date and time when information is submitted to the Commission.

77011261714

78040062743

FEC Form 1
July 1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Statement of Organization For a Committee

(Page 3)

Name of Committee

Anderson for Congress Finance Committee

11 List by name, address and position, other principal officers of the committee (include chairman, treasurer, secretary, assistant treasurer, assistant secretary, members of finance committee):

Full name	Mailing address and ZIP code	Title or position
Norris A. Aldeen	930 Paris Avenue Rockford, Illinois 61107	Chairman

12 Does this committee plan to stay in existence beyond the current calendar year? ☐ Yes ☐ NoIf "Yes" for how long? ☐13 In the event of dissolution, what disposition will be made of residual funds? ☐

14 List all banks or other repositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds

Name of bank, repository, etc.	Mailing address and ZIP code

15 List all election reports required to be filed by this committee with States and local jurisdictions, together with the names, addresses, and positions of the recipients of the reports (other than reports filed with Secretaries of State pursuant to USC 433(a)(1))

Report title	Dates required	Name and position of recipient	Mailing address and ZIP code

Submit additional information on separate continuation sheets appropriately labeled and attached to this Statement of Organization, indicate in the appropriate section above when information is continued on separate pages.

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

Elaine R. Olson

(Signature of Treasurer)

Oct 11-1977

(Date)

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. § 437g or § 461 (see instructions)

For further
information
contact:Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

7 8 0 4 0 0 6 2 7 4 1

REGULAR MAIL
MAR 14 1978

MS
482

RECEIVED
MAR 23 12:22
U.S. HOUSE OF REPRESENTATIVES
CRIMINAL JUSTICE
MAR 11 11:11

IL/16

Post Office Box 1537
Rockford, Illinois 61110
March 14, 1978

001431
C02200802

Federal Election Commission
1325 K Street, Northwest
Washington, DC 20463

RE: 15 day pre-primary report of
contributions

Gentlemen:

This letter confirms our telegram of March 13, 1978, in which we stated that we had received, on March 13, a contribution for the general election from Norris A. Aldern, 930 Paris Avenue, Rockford, Illinois 61107. This contribution was in the amount of \$1,000.00.

If you should have any further questions about this contribution, please do not hesitate to contact me.

Yours truly,

Elsie R. Olson

Elsie R. Olson, Treasurer
Anderson for Congress
Finance Committee

/jdh

78040052713

Schedule A

July 1978
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20543

Itemized Receipts,
Contributions, Ticket Purchases, Loans,
Rebates, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3

(See Instructions on back)

Page 7 of 12 for
LINE NUMBER 15(a)

(Use separate schedule for each
numbered line)

Name of Candidate or Committee on Ballot

Anderson for Congress Finance Committee

Full Name, mailing address and ZIP code

Norris A. Aldeen, 930 Paris Avenue, Rockford, Illinois 61107

Date (month,
day, year)
11/1/77

Amount of each
receipt this period
100.00

Principal place of business

Amerock
Rockford, Illinois

Occupation

Chairman of the Board

☐ Check if Contributor is self-employed

Aggregate Year-to-date \$ 600.00

Full Name, mailing address and ZIP code

Robert K. Clark, 2303 Willow Lane, Rockford, Illinois 61107

Date (month,
day, year)
11/1/77

Amount of each
receipt this period
50.00

Principal place of business

Rockford, Illinois

Occupation

Attorney

☐ Check if Contributor is self-employed

Aggregate Year-to-date \$ 160.00

Full Name, mailing address and ZIP code

Willard E. Nyquist, 6332 South Mulford Road, Cherry Valley,
Illinois 61016

Date (month,
day, year)
11/2/77

Amount of each
receipt this period
25.00

Principal place of business

Rockford, Illinois

Occupation

Real Estate Developer

☐ Check if Contributor is self-employed

Aggregate Year-to-date \$ 125.00

Full Name, mailing address and ZIP code

Mrs. Jean S. Nowell, 1575 West Deneter Drive, Freeport, Illinois
61032

Date (month,
day, year)
11/4/77

Amount of each
receipt this period
500.00

Principal place of business

Freeport, Illinois

Occupation

Private Investor

☐ Check if Contributor is self-employed

Aggregate Year-to-date \$ 600.00

Full Name, mailing address and ZIP code

Paul M. Gambino, 724 Roxbury Road, Rockford, Illinois 61107

Date (month,
day, year)
11/7/77

Amount of each
receipt this period
25.00

Principal place of business

F.M. Gambino Agency
4104 Charles Street
Rockford, Illinois

Occupation

Vice President/Sec.-Treas.

☐ Check if Contributor is self-employed

Aggregate Year-to-date \$ 125.00

Full Name, mailing address and ZIP code

J.F. Gambino, 1919 Stratford Lane, Rockford, Illinois 61107

Date (month,
day, year)
11/7/77

Amount of each
receipt this period
25.00

Principal place of business

F.M. Gambino Agency
4104 Charles Street
Rockford, Illinois

Occupation

President

☐ Check if Contributor is self-employed

Aggregate Year-to-date \$ 125.00

Subtotal of receipts this page foot-candle

\$ 725.00

Total this period (first page this line number only)

\$

73040062746

U.S. SENATE
1000 K Street, N.W.
Washington, D.C. 20540-1000

**Itemized Receipts,
Contributions, Ticket Purchases, Loans,
Rebates, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3**
(See instructions on back)

Page 5 of 5 for
LINE NUMBER 15(a)
(Use separate schedule(s) for each
numbered line)

Name of Candidate or Committee in full Anderson for Congress Finance Committee			
Full Name, mailing address and ZIP code Henry A. Harris, 815 First Avenue, Rockford, Illinois 61110 (P.O. Box 1636)		Date (month, day, year) 9/15/77	Amount of each receipt this period \$200.00
Principal place of business Rockford, Illinois	Occupation Executive, partially retired from Harris Tire Company ☐ Check if Contributor is self-employed Aggregate Year-to-date \$ 200.00		
Full Name, mailing address and ZIP code Roland E. Carlson, 305 St. Louis Avenue, Rockford, Illinois 61103		Date (month, day, year) 9/15/77	Amount of each receipt this period 300.00
Principal place of business Rockford, Illinois	Occupation President, S.J. Carlson & Son, Inc. ☐ Check if Contributor is self-employed Aggregate Year-to-date \$ 300.00		
Full Name, mailing address and ZIP code Norris A. Aldeen, 930 Paris Avenue, Rockford, Illinois 61107		Date (month, day, year) 9/23/77	Amount of each receipt this period 500.00
Principal place of business Rockford, Illinois	Occupation Chrm. of Board, Amerock Corp. ☐ Check if Contributor is self-employed Aggregate Year-to-date \$ 500.00		
Full Name, mailing address and ZIP code Dave S. Marth, 2133 Jonquil Place, Rockford, Illinois 61107		Date (month, day, year) 9/27/77	Amount of each receipt this period 200.00
Principal place of business Rockford, Illinois	Occupation President, Dasco Products ☐ Check if Contributor is self-employed Aggregate Year-to-date \$ 200.00		
Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt this period
Principal place of business	Occupation ☐ Check if Contributor is self-employed Aggregate Year-to-date \$		
Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt this period
Principal place of business	Occupation ☐ Check if Contributor is self-employed Aggregate Year-to-date \$		
Subtotal of receipts this page (attach all)			\$1,200.00
Total this period (last page this line number only)			\$7,500.00

REPORTS ANALYSIS REFERRAL SHEET

Date April 13, 1978

Analyst Mike Filler

47

TO: General Counsel

Team Chief Peter Kell, Jr.

Compliance Review CB

THROUGH: Staff Director JP

FROM: Assistant Staff Director for Reports Analysis Don Buckhart

DESCRIPTION:

Independent Expenditure

Candidate/Committee NORRIS ALDEEN-Chairman, Anderson for Congress Finance Cmte.

Report filed by:

Treasurer John W. Glynn

Address 4450 Tullock's Woods Trail, Rockford, Illinois 61103

REPORTS: (For reports reviewed, amendments, RFAI's, etc, see indices, Attachment 1) Not applicable.

Period Covered from 30 Day Post Primary-III. to _____

Independent Contributions

Total Receipts \$ 5670.

Independent

Total Expenditures \$ 5670.

Cash on Hand \$ _____

Debts \$ _____

REASON(S) FOR REFERRAL:

<u>Allegation(s)</u>	<u>Cite</u>	<u>Attachment</u>
Agent of Anderson for Congress Finance Committee		
making independent expenditures.	11 CFR 109.1(b)(4)(i)(B)	FORM 5-#1
		FORM 1-#2

HISTORY.

An independent expenditure report(FORM 5) filed by John W. Glynn listed several individuals making independent contributions--two being from Norris Aldeen, chairman of the Anderson for Congress Finance Committee. 11 CFR 109.1(b)(4)(i)(B) prohibits independent expenditures by agents of the candidate's committee.

Attachment #3 shows that Mr. Aldeen has also contributed \$600 in Primary and \$1000 for the General Election.

Requests for Additional Information will be sent to John Glynn and the other individuals itemized on the FORM 5 (excluding Mr. Aldeen), in order that these individuals can properly disclose independent expenditures/contributions according to the Commission's decision of April 6, 1978.

There has been no communication with Mr. Glynn or Mr. Aldeen.

RAD File # 3L-27

73040062747

REPORT OF INDEPENDENT EXPENDITURES OR CONTRIBUTIONS BY PERSONS

Page 3 of 3

(Instructions on reverse side)

Note: Every person (other than a political committee or candidate) who makes contributions or expenditures for communications which expressly advocate the election or defeat of a clearly identified candidate for federal office, other than by contribution to a political committee or candidate, in an aggregate amount in excess of \$100 within a calendar year must file this Report. (See reverse side). POLITICAL COMMITTEES do NOT file Reports of Receipts and Expenditures on FEC Form 5. Political committees file Reports on FEC Form 3.

1(a) Name of Person (in Full)

John W. Glynn

(b) Address (Number & Street)

4450 Tullock's Woods Trail

(c) City, State & Zip Code

Rockford, IL 61103

2 This is a Report of

☐ Independent Expenditures

☒ Independent Contributions

☐ Both

3 Type of Report (check appropriate box)

☐ April 10 ☐ October 10

☐ July 10 ☐ January 31

☐ Tenth day report preceding

☐ Amendment to _____ Report

election on _____ in the state of _____

☐ Thirtieth day report following _____

(primary, general or convention)

election on 3/21/78 in the state of Illinois

☐ Thirtieth day report following _____

(primary, general or convention)

4 Itemize expenditures and contributions which exceed, in the aggregate, \$100 within a calendar year.

Full Name, Mailing Address & Zip Code of Each Payee	Purpose of Expenditure/Contribution	Date (month, day, year)	Amount	Name of Federal Candidate advocated by the Expenditure/Contribution
☐ Expenditure to ☒ Contribution to Mr. Daniel Nielsen 5047 Crofton Dr. Rockford, IL 61111	Newspaper advertising	3/18 & 3/20	\$200	John B. Anderson
☐ Expenditure to ☒ Contribution to Mr. & Mrs. Arthur Wilcox 1907 Edgebrook Rockford, IL 61107	ditto	ditto	\$200	ditto
☐ Expenditure to ☒ Contribution to Mr. & Mrs. Bengt Sjostrom 1800 Birchwood Drive Rockford, IL 61111	ditto	ditto	\$200	ditto
☐ Expenditure to ☐ Contribution to				

(b) Subtotal of Itemized Expenditures and/or Contributions.....\$3900

(c) Subtotal of Unitemized Expenditures and/or Contributions.....\$1770

(d) Total Expenditures and/or Contributions.....\$5670.00

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

(Signature)

(Date)

Statement of Organization For a Political Committee

Supporting any candidate(s) for federal office and anticipating contributions or expenditures in excess of \$1,000 in any calendar year in support of such candidate(s).

(See Reverse Side For Instructions.)

Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

1(a) Name of Committee (in full) ☐ Check if name or address is changed Anderson for Congress Finance Committee		2 Identification Number H.R. 00143 C00000802	
(b) Address (number and street) American National Bank, 501 Seventh Street (P.O. Box 1537)		3 Date October 6, 1977	
(c) City, State and ZIP code Rockford, Illinois 61110		4 Is this an amended statement ☒ Yes ☐ No If "YES" FILL IN ONLY THOSE LINES ON WHICH THERE HAS BEEN A CHANGE	
5 Check one ☒ (a) This committee has been designated as the principal campaign committee for <u>John Bayard Anderson</u> (Name of Candidate) a candidate for <u>U.S. House of Representatives</u> in the <u>1978</u> Election (Federal office sought) (Year of election) to be held in the State of <u>Illinois</u> (State in which election is held) (THE PRINCIPAL CAMPAIGN COMMITTEE WILL FORWARD TO THE COMMISSION A COPY OF THE STATEMENT OF ORGANIZATION FOR EACH AFFILIATED COMMITTEE REQUIRED TO FILE WITH IT.) ☐ (b) This committee is supporting only one candidate, and is authorized by _____ (Name of Candidate) to receive contributions and make expenditures with respect to the _____ Election(s) (General, Primary, Runoff, etc.) held in _____, and will file all reports and statements with the candidate's principal campaign committee. _____ (Full name of principal campaign committee) (ATTACH A COPY OF CANDIDATE'S WRITTEN AUTHORIZATION.) (SEE FORM 2a) ☐ (c) This committee supports only one candidate _____ but is not an authorized committee. (Name of Candidate) ☐ (d) This committee supports more than one Federal candidate and is not a party committee. ☐ (e) This committee is a _____ committee of the _____ Party. (National, State, county, city) (Democratic, Republican, etc.)			
6 Names of affiliated and/or connected organizations		Mailing address and ZIP code	
		Relationship	

If the registering political committee has identified a "connected organization" above, please indicate type of organization:

- ☐ Corporation ☐ Labor organization ☐ Membership organization ☐ Trade association ☐ Cooperative
- ☐ Corporation without capital stock ☐ Other (please specify) _____

Submit additional information on separate continuation sheets appropriately labeled and attached to this Statement of Organization. Indicate in the appropriate section above when information is continued on separate pages.

Statement of Organization For a Committee

(Page 2)

Name of Committee

7. Area, Scope and Jurisdiction of Committee:

- (a) Will this committee operate in more than one State? ☐ Yes ☐ No
(b) Will it operate on a statewide basis in one State? ☐ Yes ☐ No
(c) Will it primarily support candidates seeking State or local office? ☐ Yes ☐ No
(d) Will it support or does it anticipate supporting directly or indirectly, candidates for Federal office in excess of \$1,000 in a calendar year? ☐ Yes ☐ No

8. (a) List by name, address, office sought, and party affiliation, any candidate for Federal office that this committee is supporting:

Full name(s) of candidate(s)	Mailing address and ZIP code	Office sought	Party

(b) List by name, address, office sought, and party affiliation, any candidate(s) for any other public office(s) that this committee is supporting (unless the committee is supporting the entire ticket of a party as indicated in line 9):

Full name(s) of candidate(s)	Mailing address and ZIP code	Office sought	Party

9. If this committee is supporting the entire ticket of a party, give name of party: ▶

10. Identify by name, address and position, the person in possession of committee books and records:

Full name	Mailing address and ZIP code	Title or position

Submit additional information on separate continuation sheets appropriately labeled and attached to this Statement of Organization. Indicate in the appropriate section above when information is continued on separate page(s).

77011261714

78040062752

REGULAR MAIL

MAR 14 1978

RECEIVED
1978 MAR 20 11:11
OFFICE OF THE CLERK
U.S. HOUSE OF REPRESENTATIVES
12:22
IL/16

Post Office Box 1537
Rockford, Illinois 61110
March 14, 1978

MS
48m
Federal Election Commission
1325 K Street, Northwest
Washington, DC 20463

RE: 15 day pre-primary report of
contributions

Gentlemen:

This letter confirms our telegram of March 13, 1978, in which we stated that we had received, on March 13, a contribution for the general election from Norris A. Aldeen, 930 Paris Avenue, Rockford, Illinois 61107. This contribution was in the amount of \$1,000.00.

If you should have any further questions about this contribution, please do not hesitate to contact me.

Yours truly,

Elsie R. Olson

Elsie R. Olson, Treasurer
Anderson for Congress
Finance Committee

/jdh

78040062755
78040062755

Schedule A

July 1976
Federal Election Commission
1325 M Street, N.W.
Washington, D.C. 20543

Itemized Receipts,
Contributions, Ticket Purchases, Loans,
Rebates, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3
(see instructions on back)

Page 7 of 12 for

LINE NUMBER 15(n)

(Use separate schedule(s) for each numbered line)

Name of Candidate or Committee in full

Anderson for Congress Finance Committee

Full Name, mailing address and ZIP code

Norris A. Aldeen, 930 Paris Avenue, Rockford, Illinois 61107

Date (month,
day, year)

11/1/77

Amount of each
receipt this period

100.00

Principal place of business

Amerock
Rockford, Illinois

Occupation

Chairman of the Board

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$ 600.00

Full Name, mailing address and ZIP code

Robert K. Clark, 2303 Willow Lane, Rockford, Illinois 61107

Date (month,
day, year)

11/1/77

Amount of each
receipt this period

50.00

Principal place of business

Rockford, Illinois

Occupation

Attorney

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$ 160.00

Full Name, mailing address and ZIP code

Willard E. Nyquist, 6332 South Mulford Road, Cherry Valley,
Illinois 61016Date (month,
day, year)

11/2/77

Amount of each
receipt this period

25.00

Principal place of business

Rockford, Illinois

Occupation

Real Estate Developer

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$ 125.00

Full Name, mailing address and ZIP code

Mrs. Jean S. Newell, 1575 West Demeter Drive, Freeport, Illinois
61032Date (month,
day, year)

11/4/77

Amount of each
receipt this period

500.00

Principal place of business

Freeport, Illinois

Occupation

Private Investor

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$ 600.00

Full Name, mailing address and ZIP code

Paul M. Gambino, 724 Roxbury Road, Rockford, Illinois 61107

Date (month,
day, year)

11/7/77

Amount of each
receipt this period

25.00

Principal place of business

F.M. Gambino Agency
4104 Charles Street
Rockford, Illinois

Occupation

Vice President/Sec.-Treas.

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$ 125.00

Full Name, mailing address and ZIP code

J.F. Gambino, 1919 Stratford Lane, Rockford, Illinois 61107

Date (month,
day, year)

11/7/77

Amount of each
receipt this period

25.00

Principal place of business

F.M. Gambino Agency
4104 Charles Street
Rockford, Illinois

Occupation

President

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$ 125.00

Subtotal of receipts this page (optional)

▶ \$ 725.00

Total this period (last page this line number only)

▶ \$

**Itemized Receipts,
Contributions, Ticket Purchases, Loans,
Rebates, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3**
(See instructions on back)

Page 5 of 5 for

LINE NUMBER 15(a)

(Use separate schedule(s) for each numbered line)

Name of Candidate or Committee in full

Anderson for Congress Finance Committee

Full Name, mailing address and ZIP code

Henry A. Harris, 815 First Avenue, Rockford, Illinois 61110
(P.O. Box 1636)

Date (month,
day, year)

9/15/77

Amount of each
receipt this period

\$200.00

Principal place of business

Rockford, Illinois

Occupation Executive, partially retired
from Harris Tire Company

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$ 200.00

Full Name, mailing address and ZIP code

Roland E. Carlson, 305 St. Louis Avenue, Rockford, Illinois
61108

Date (month,
day, year)

9/15/77

Amount of each
receipt this period

300.00

Principal place of business

Rockford, Illinois

Occupation President, S.J. Carlson
& Son, Inc.

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$ 300.00

Full Name, mailing address and ZIP code

Norris A. Aldeen, 930 Paris Avenue, Rockford, Illinois 61107

Date (month,
day, year)

9/20/77

Amount of each
receipt this period

500.00

Principal place of business

Rockford, Illinois

Occupation Chrm. of Board, Amerock
Corp.

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$ 500.00

Full Name, mailing address and ZIP code

Dave S. Marth, 2133 Jonquil Place, Rockford, Illinois 61107

Date (month,
day, year)

9/27/77

Amount of each
receipt this period

200.00

Principal place of business

Rockford, Illinois

Occupation President, Dasco Products

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$ 200.00

Full Name, mailing address and ZIP code

Date (month,
day, year)

Amount of each
receipt this period

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$

Full Name, mailing address and ZIP code

Date (month,
day, year)

Amount of each
receipt this period

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$

Subtotal of receipts this page (optional)

▶ \$1,200.00

Total this period (last page this line number only)

▶ \$7,500.00



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 579

