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FEDERAL ELECTION COMMISSION WASHINGTON, D.C. 20463

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FEDERAL ELECTION COMMISSION

WASHINGTON DE 20463

LAWRENCE M. NOBLE GENERAL COUNSEE May 16, 1994

MEMORANDUM

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THROUGH: JOHN C. SURINA STAFF DIRECTOR

FROM: ROBERT J. COSTA ASSISTANT STAFF DIRECTOR AUDIT DIVISION

SUBJECT: LENORA B. FULANI FOR PRESIDENT - REFERRAL MATTERS

On April 21, 1994 the Commission approved the final audit report (FAR) on Lenora B. Fulani for President. The report was released to the public on May 6, 1994. In accordance with the Commission approved materiality thresholds, the attached findings from the audit report are being referred to your office:

Apparent Excessive Contributions Resulting from Staff Advances
 Reporting of Debts and Obligations

Please note that the Committee materially corrected its disclosure reports relative to the <u>Reporting of Debts and</u> <u>Obligations</u> finding. However, the <u>Committee's interim</u> audit report response to this finding did not include documentation to substantiate its claims regarding whether the payment arrangement with a law firm was in accordance with 11 CFR 116.3(a). As a result, this payment arrangement appears to constitute a contribution.

All workpapers and related documentation are available for review in the Audit Division. Should you have any questions, please contact Marty Favin at 219-3720. Remorandum to Lawence M. Noble Page 2

Attachments:

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- FAR Finding II.A. (Apparent Excessive Contributions Resulting from Staff Advances), FAR Pgs. 4-9
- FAR Finding II.B. (Reporting of Debts and Obligations), FAR Pgs. 9-12
- Schedule of 116.5 Summary of Expenses, Pgs. 1-5
- Audit Analysis of Staff Advances under 116.5 for Fulani, Pgs. 1-32
- Explanation of Symbols and Methodology Used in Generating Report of Apparent Excessive Contributions Resulting from Staff Advances as Defined under 11 C.F.R. 116.5, Pgs. 1-4

A. Apparent Excessive Contributions Resulting from Staff Advances

Section 441a(a)(1)(A) of Title 2 of the United States Code states, in part, that no person shall make contributions to any candidate with respect to any election for Federal office which, in the aggregate, exceed \$1,000.

Section 116.5(b) of Title 11 of the Code of Federal Regulations states that the payment by an individual from his or her personal funds, including a personal credit card, for the costs incurred in providing goods or services to, or obtaining goods or services that are used by or on behalf of, a candidate or political committee is a contribution unless the payment is exempted from the definition of contribution under 11 C.F.R. \$100.7(b)(8). If the payment is not exempted under 11 C.F.R. \$100.7(b)(8), it shall be considered a contribution by the individual unless; the payment is for the individual's transportation expenses incurred while traveling on behalf of a candidate or political committee of a political party or for usual and normal subsistence expenses incurred by an individual, other than a volunteer, while traveling on behalf of a candidate or political committee of a political party; and, the individual is reimbursed within sixty days after the closing date of the billing statement on which the charges first appear if the payment was made using a personal credit card, or within thirty days after the date on which the expenses were incurred if a personal credit card was not used. For purposes of this section, the closing date shall be the date indicated on the billing statement which serves as the cutoff date for determining which charges are included on that billing statement. In addition, "subsistence expenses" include only expenditures for personal living expenses related to a particular individual traveling on committee business, such as food or lodging.

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During our review of the Committee's expense reimbursements to campaign staff, we noted that from the Committee's inception through December 31, 1992, 14 individuals advanced funds on behalf of the Committee in excess of the \$1,000 limitation. In order to calculate the amount of a contribution resulting from an advance made by an individual on behalf of the Committee, payments made by the Committee were applied against those expenses that had been incurred the earliest. The expenses incurred were for travel and subsistence and campaign-related goods and services. It was also noted that a number of individuals paid the transportation, travel, and other campaign expenses incurred by other individuals, including the candidate's expenses, using their personal credit cards. Several of the credit card statements we reviewed also included charge-activity summaries under the names of other individuals indicating that additional cards were provided to and used by these other individuals for campaign-related transactions. The excessive amount, which is the sum total of the highest excessive balance

for each individual, totaled \$86,562. The number of days outstanding before reimbursement of the excessive amounts ranged from 1 to 133 days. At the close of fieldwork, no outstanding expense reimbursements were identified.

At the exit conference, the Audit staff provided the Committee with a listing of the relevant expenses and contributions associated with the 14 individuals. The Treasurer stated that the Committee was not aware of the requirements of 116.5. The Treasurer also commented that "the regulation and repayment periods are unfair to candidates who do not have access to credit as easily as a Governor or a U.S. Senator. Banks will grant credit to these people on the basis of name recognition or political position. Lesser known candidates and their committees are forced to rely on Committee volunteers and supporters to provide their good name. She added that there is no justification for being penalized for these reasons."

In addition, on March 18, 1993 the Audit staff requested, in writing, that the Treasurer obtain certain billing statements from individuals (8 of the 14 noted above plus 8 additional) whose credit cards were available for use by the Committee. These statements were requested to enable the Audit staff to complete the verification of qualified campaign expenses and the testing of excessive contributions resulting from advances made by Committee staff/individuals on behalf of the Committee.

The Committee was granted ten business days to respond to the request (April 7, 1993). On March 30, 1993 the Audit staff received a written response which stated that none of the missing statements would be provided since the statements were for the individuals' personal credit cards and therefore not in the Committee's possession. In addition to this response the Committee provided photocopies of documentation already reviewed by the Audit staff.

At the March 31, 1993 exit conference the Audit staff reiterated that the Committee still had until April 7, 1993 to provide the requested missing statements and that absent the production of these statements, a request would be made to the Office of General Counsel (OGC) for subpoenas to be issued to American Express, Chittenden Bank Visa, Chase: Visa and Mastercard, Citibank: Visa and Mastercard, Choice Visa and Chemical Bank Visa for the production of the credit card statements, charge slips and any other documentation related to the missing statements.

An additional written response from the Committee was received by the Audit staff on April 7, 1993. In this response, the Committee stated that the payments made by the Committee directly to credit card companies for individuals' expenses were for credit cards not under the Committee's control and that the missing statements covered the individuals' personal expenses only. The response concluded that the Committee did not have the authority to request the missing credit card statements from individuals for expenses not related to the campaign and viewed this request as an infringement on these individuals' privacy.

On August 10, 1993, the Commission approved the OGC's recommendation to issue subpoenas to the credit card companies noted above for the production of the missing credit card statements, charge slips and other documentation relevant to 16 individuals whose credit cards were available for use by the Committee. At the Committee's request, staff from OGC and the Audit Division met with the Treasurer and Committee Counsel on August 12, 1993 to discuss the Audit staff's request for the missing credit card documentation. At this meeting Committee Counsel discussed the possibility of obtaining affidavits from these individuals which attested that no charges were posted to their credit card statements for expenses to or on behalf of the Committee during the time periods in question.

It was agreed that affidavits would be acceptable from 3 of the 16 individuals given the relatively low level of activity and absence of any unusual patterns or other indications suggesting a significant level of activity occurred during the periods for which statements were not available. Signed affidavits for 7 of these 8 individuals were received in September 1993.3/

In the interim audit report the Audit staff recommended that the Committee submit additional documentation to establish that the individuals noted did not exceed the contribution limits of 2 U.S.C. \$441(a)(1)(A), and/or that the individuals were reimbursed in a timely manner [as defined under 116.5(b)(2)]; or provide any other relevant comments or documentation. It was further recommended that the Committee provide the documentation and affidavit requested by the Audit staff and that once reviewed, revisions would be made, if warranted.

In the initial response to the interim audit report the Committee Treasurer points out that "Dr. Fulani's campaign for President in 1992 was a "grassroots, community-based operation" which raised over \$2 million from almost 100,000 individuals and that since the candidate was on the ballot in 39 states and the District of Columbia, the candidate and Committee staff/volunteers travelled constantly. She explains that the Committee was denied

In lieu of an affidavit, documentation relative to the remaining individual was received in October 1993. With respect to the other 8 individuals for which statements were requested, all missing documentation was subsequently provided by either the credit card companies or the Committee. See Page 8, Paragraph 6 for the results of the Audit staff's analysis of this additional documentation. a corporate American Express card and that it was "impossible" to make travel arrangements without credit. She adds that even Federal Express would not open an account for the Committee without a credit card for security since "...we were a political committee and thus presumably could not be trusted financially." As a result, the Committee relied upon individuals' credit to secure these essential services.

The Treasurer states that the Committee does not believe that the transactions in question violate 2 U.S.C. §441a because the credit card charges were paid in the normal course of business without any request from the Commission or from any other outside party, there was no intent on the part of these individuals for these charges to be contributions, and the individuals were told that the Committee was financially responsible for the charges. In addition, these charges were handled by the Committee as if they were routine vendor purchases and were usually paid back within 60 days when they were still open for payment, but not overdue.

The Treasurer argues that 11 C.F.R. \$116.5 is unfair to the Committee because "...by solely exempting a person's own travel and subsistence expenses from the definition of contribution, the Commission is discriminatory towards smaller, grassroots campaigns involving candidates and their supporters who in large part neither have personal credit to use for their own travel and subsistence, much less connections to banking institutions that would enable the campaign to obtain 'commercial' credit lines." She adds that the Committee was forced to use these individuals' credit cards for campaign-related expenses which were not for their own travel and subsistence, but that in most cases these expenses were paid within 60 days and that if an individual advanced money towards the expenses it was done on their own initiative, not at the request of the Committee.

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The Treasurer strongly urges the Commission not to take any enforcement action against the Committee relative to these transactions for two reasons. First, if the 60 days allowed for an individual's own travel was allowed for the types of transactions considered excessive contributions in the finding, "... there would be practically no 'excessive contributions.'" Secondly, she points out the "practical impossibility of operating without credit cards in our economy." The Treasurer adds that this regulation was not in existence when the candidate first qualified for matching funds in 1988 and that the Committee "...failed to notice the new regulation, and to realize its implications, for the practice of using personal credit cards for vendor transactions" when setting up its 1992 procedures. She further states that the Commission should find that no violation has occurred but if the Commission should find otherwise, "...this candidate will now be fully on notice of the Commission's interpretation of the law."

The Treasurer concludes that "[t]he Commission has properly interpreted the Federal Election Campaign Act to make it possible for independent candidates to qualify for matching funds. We respectfully request that the Commission now take into consideration the particular operations of smaller, grassroots campaigns, and not apply in a rigid way regulations that are biased against the good-faith operations of campaigns such as ours."

In the supplemental response to the interim audit report, the Committee's Counsel expands on the Treasurer's conclusion noted in the previous paragraph. He notes that "[t]he Commission has previously taken into account the differences between the actual operations of major party and independent/minor party campaigns so as to devise enforcement policies that are fair and even-handed in practice, not just in theory." He refers to a series of advisory opinions (AO) which dealt with the eligibility of minor party candidates to receive matching funds whether or not they were participating in a nomination or ballot access process that even included primary election contests [AO 1975-44 (Socialist Workers); AO 1983-47 (Sonia Johnson); and, AO 1984-25 (Sonia Johnson)].

Committee Counsel concludes that if the Commission applies the underlying principles used in formulating these advisory opinions to this issue that the Commission should "...net interpret or enforce 11 C.F.R. 116.5 in a rigid manner that discriminates against smaller, grassroots campaigns which, in the arena of presidential politics, has historically included virtually every independent or minor party presidential campaign."

It is the opinion of the Audit staff that the Committee's arguments and other comments provided in response to the interim audit report do not warrant any change to the Audit staff's analysis as presented in the interim audit report.

However, the excessive amount (\$86,562), which was developed based on records made available during fieldwork, requires revision. See discussion at pages 4 - 5.

Analysis of Documentation Received After Issuance of the Interim Audit Report

As noted above, the finding contained in the interim audit report addressed excessive contributions totaling \$86,562; the Committee's responses addressed the facts relative to the development of this figure.

Subsequent to the reissuance of the interim audit report, additional credit card documentation obtained from the credit card companies via the subpoena process and/or provided by the Committee was received. These credit card statements were reviewed by the Audit staff and since certain expenses relative to travel, subsistence and related expenses were incurred during the time periods for which these cards had been made available for the Committee's use, the Audit staff included them in the 11 CFR 116.5 analysis. Absent a demonstration to the contrary, these transactions were considered campaign-related.

It should be noted that the Committee has maintained from the onset that these charges are not related to the candidate's campaign for nomination (See pages 5-6). The Committee did not reimburse any of the individuals for any of the expenses enumerated, nor was there any indication in the records reviewed by the Audit staff that any individual requested reimbursement for any of these transactions.4/

Based on the inclusion of these apparent campaign-related charges, the revised sum total of the highest excessive balances relative to the 14 individuals is \$107,072, an increase of \$20,510 (\$107,072 - \$86,562) from the figure cited in the interim audit report.

Reporting of Debts and Obligations

Section 434(b)(8) of Title 2 of the United States Code requires that each report shall disclose the amount and nature of outstanding debts and obligations owed by or to such political committee.

Section 104.11 of Title 11 of the Code of Federal Regulations states, in part, that debts and obligations owed by or to a political committee which remain outstanding shall be continuously reported until extinguished. If the exact amount of a debt or obligation is not known, the report shall state that the amount reported is an estimate.

Section 116.3(a) of Title 11 of the Code of Federal Regulations states that a commercial vendor that is not a corporation may extend credit to a candidate, a political committee or another person on behalf of a candidate or political

4/ Included in the credit card documentation reviewed by the Audit staff were credit card slips imprinted with "Rainbow Lobby" under the basic and supplemental cardholders' name. The Rainbow Lobby was apparently formed by the New Alliance Party (NAP) in 1984. The NAP was the party which Dr. Fulani represented during the 1992 election.

A representative of American Express explained that the account in question is a company account not a corporate account and is therefore the sole responsibility of the basic cardholder, not the Rainbow Lobby. A cardholder can arrange for a company name to be imprinted on a credit card without the company being responsible for the account.

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committee; and, an extension of credit will not be considered a contribution to the candidate or political committee provided that the credit is extended in the ordinary course of the commercial vendor's business and the terms are substantially similar to extensions of credit to nonpolitical debtors that are of similar risk and size of obligation. Section 116.3(c) of Title 11 of the Code of Federal Regulations states that in determining whether credit was extended in the ordinary course of business, the Commission will consider: (1) whether the commercial vendor followed its established procedures and its past practice in approving the extension of credit; (2) whether the commercial vendor received prompt payment in full if it previously extended credit to the same candidate or political committee; and (3) whether the extension of credit conformed to the usual and normal practice in the commercial vendor's trade or industry.

During our review of selected Committee disbursements, the Audit staff noted that the Committee did not disclose \$98,209 of debts attributable to the International Peoples' Law Institution (IPLI), a firm which provided legal services to the Committee. Of this amount, \$59,179 was not reported on the September 1992 Report, and \$39,030 was not reported on the October 1992 Report. The Audit staff noted that the IPLI invoiced the Committee only twice during the campaign, on 1/30/92 in the amount of \$109,060, covering 3/1/91 through 12/31/91 services, and on 9/1/92 in the amount of \$124,004, covering 1/1/92 through 8/20/92 services.

At the exit conference the Committee was provided with a schedule of debts and obligations that were not properly disclosed. The Audit staff explained that by not disclosing fully large amounts of debt a Committee's financial condition is misstated. The Treasurer stated that she understood and she explained that the Committee did not always maintain the debt records on a current basis during the campaign.

The Audit staff requested that the Committee provide an explanation as to why it took so long for the IPLI to invoice the Committee. The Treasurer referred to the agreement between the IPLI and the Committee which stipulated that the Committee pay the IPLI a minimum monthly retainer of \$3,000 commencing in March, 1991. The agreement further stated that the IPLI would postpone the receipt of any amount in excess of the \$3,000 monthly retainer until the Committee received its first matching fund payment. A modification to the retainer agreement was made on September 1, 1991 in which the monthly retainer was increased from \$3,000 to \$4,000. The Audit staff noted that the Committee made payments in accordance with the retainer agreement.

The Audit staff asked the Committee Treasurer for an explanation regarding the length of time between the two invoices discussed above. She responded that an oral agreement was made with the IPLI in which the IPLI agreed to accrue amounts due, net of the monthly retainer, until the end of the campaign, at which time the Committee would pay the balance due. The Audit staff questioned whether this extension of credit by the IPLI is in the ordinary course of business, and whether the terms are substantially similar to extensions of credit to nonpolitical debtors that are of similar risk and size of obligation. See 11 C.F.R. \$\$100.7(a)(4) and 116.3(a).5/

In the interim audit report the Audit staff recommended that the Committee amend its September 1992 and October 1992 Reports for the two IPLI balances not disclosed as required and that the Committee demonstrate that the payment arrangement with the IPLI was in accordance with 11 C.F.R. §116.3(a). It was further recommended that, in the future, the Committee institute stronger internal controls to comply with debt reporting regulations.

In response to the interim audit report the Committee amended its September 1992 and October 1992 Reports correctly disclosing the two IPLI debts.

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In addition, the Committee provided a letter from its Counsel, an individual who was a partner in the IPLI during the time it performed legal work for the Committee. Counsel describes IPLI as a "law firm partnership" that "...was founded for the purpose of advancing democracy and social justice by providing legal representation." He states that the IPLI's "...established procedures for billing included sliding scale fees and flexible credit arrangements" and that "[t]he payment arrangements with the Committee were within a normal range for such arrangements and, in any event, not unusually favorable towards the Committee in comparison to other IPLI clients."

He adds that the extension of credit met the "usual and normal practice in the commercial vendor's trade or industry" requirement of 11 C.F.R. \$116.3(c)(3), in two respects. First, its common for law firms to accept payments from such clients based upon funding cycles or cash flow; in this case the receipt of federal matching funds and individual contributions from fundraising efforts. He states as an example that "...social service and other nonprofit organizations often are forced to build up substantial liabilities leading up to the date when a major grant or contract payment is received from a governmental or foundation source and "[1]aw firms, like other vendors are prepared to perform work during the 'lean' months without full payment for their services in anticipation of being paid in the future. Second, "...law firms are permitted to provide legal services to federal political committees for no charge at all, i.e. pro bono and that "...it was a 'usual and normal practice'

5/ The Audit staff verified with the State of New York, Department of State that the IPLI is not incorporated. for the IPLI to take the risk that a client that agreed to pay a fee might be unable to pay the entire fee and the representation would end up being largely (or entirely) pro bono."

Given that the vast majority of the legal fees relate to the inclusion of the candidate in debates and ballot access work performed by IPLI, the assertion that these services could have been provided pro bono is incorrect. The Regulations, at 11 C.F.R. §§ 100.7(b)(13) and (14) exempt from the definition of contribution legal services which (1) are not attributable to activities which directly further the election of any designated candidate for Federal office, or (2) services which are solely to ensure compliance with the Act or 26 U.S.C. §§ 9001 <u>et seq.</u> and 9031 et seq.

Further, although the Committee in its response, as detailed above, asserts that the extension of credit was not a contribution and has included representations relative to IPLI's ordinary course of business, including terms offered to other IPLI clients, and statements regarding the usual and normal practices for law firms, no documentation has been provided to substantiate the claims made.

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The Audit staff finds that based on the information provided, the payment arrangement between the Committee and the IPLI appears to constitute a contribution under 11 C.F.R. §116.3(a). FEDERAL ELECTION COMMISSION 999 E Street, N.W. May 20 3 46 PM '96 Washington, D.C. 20463

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FIRST GENERAL COUNSEL'S REPORT

MUR 3969 STAFF MEMBER: Andre G. Pineda

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RESPONDENTS:

Lenora B. Fulani for President Committee Francine Miller, as Treasurer David Belmont Jini L. Berman Eleanor Fain Margaret E. Golden Lawrence A. Grigsby Jeannine Hahn Robert Levy Fred Newman John B. Opdyke Marsha Plafkin James Ross Nancy Ross Cathy Stewart Margaret E. Tanzosh International Peoples' Law Institution

RELEVANT STATUTES/ REGULATIONS:

2 U.S.C. § 431(11) 2 U.S.C. § 441a(f) 11 C.F.R. § 100.10 11 C.F.R. § 116.3 11 C.F.R. § 116.5 11 C.F.R. § 9032.9 2 U.S.C. § 441a(a)(1)(A) 11 C.F.R. § 100.7(a)(11) 11 C.F.R. § 116.1(c) 11 C.F.R. § 116.5(b) 11 C.F.R. §§ 100.7(b)(8) and (14)

INTERNAL REPORTS CHECKED:

Audit Documents

FEDERAL AGENCIES CHECKED:

None

I. GENERATION OF MATTER

The Lenora B. Fulani for President Committee ("the Committee") is the authorized committee of Dr. Lenora B. Fulani, a candidate for the 1992 presidential nomination of a national party and four separate party committees in four states.¹ The Committee received \$2,013,323 in matching funds from the United States Treasury. 26 U.S.C. §§ 9033 and 9034. Pursuant to 26 U.S.C. § 9038(a), the Commission conducted an audit and examination of the Committee's receipts, disbursements, and qualified campaign expenses. In addition, the audit included an evaluation of whether the Committee complied with the Federal Election Campaign Act, as amended. 11 C.F.R. § 9038.1(c)(1)(i) and (iv). This matter was generated from information obtained during the audit of the Committee. 11 C.F.R. § 9038.1(e)(2). The Audit Division's referral materials are attached. Attachment 1; *see also* Attachment 2.

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The Audit Division's referral materials include two findings. One is the Committee's receipt of excessive contributions from individuals who made advances to the Committee. The other finding is related to whether one of the Committee's vendors, the International Peoples' Law Institution ("IPLI"), extended credit to the Committee outside the ordinary course of business for the provision of legal services.² The Office of General Counsel recommends that the Commission find reason to believe that the individuals made, and the Committee accepted, excessive contributions as a result of staff advances. However, due to the overlap between the issues in this matter and the Commission's investigation of the Committee under 26 U.S.C.

The Committee registered with the Commission on March 11, 1991.

The Committee paid IPLI \$234,589.48 for legal services.

§ 9039, this Office recommends that the Commission take no action at this time with respect to the extension of credit from IPLI.

On July 26, 1994, the Commission opened an investigation pursuant to 26 U.S.C. § 9039(b) to examine the Committee's use of public funds. As part of this investigation, the Commission questioned whether the amount paid to IPLI was a qualified campaign expense. Based on the information obtained during the course of the investigation, the Commission made an initial determination that the payments made to IPLI were nonqualified campaign expenses.³ *Lenora B. Fulani for President*, Notice of Initial Repayment Determination (August 3, 1995).

Although the Commission's determinations in the Section 9039 inquiry and the enforcement matter involve different issues, the facts that will be considered in each context are essentially the same.⁴ For both issues, the Commission must review the facts underlying the Committees financial transactions with IPLI. *Compare* 11 C.F.R. §§ 116.3(c)(1)-(3) *with* 11 C.F.R. §§ 9032.9(a)(1)-(3). However, since the Commission has only made an initial repayment determination as to whether the Committee's disbursements to IPLI were qualified campaign expenses, there has not been a resolution of the facts in that matter. *See* 11 C.F.R.

The Commission made an initial repayment determination that the Committee must repay \$612,537.32 to the United States Treasury. *Lenora B. Fulani for President*, Notice of Initial Repayment Determination (August 3, 1995). A portion of the initial repayment determination, \$83,832.87 [(\$194,585.03 (Committee payments before the candidate's date of ineligibility x .430829 (repayment ratio)], represents Committee payments made to IPLI that are repayable to the United States Treasury. *Id.* at 35.

⁴ The question of whether the disbursements to IPLI were qualified campaign expenses and the question of whether IPLI extended credit to the Committee in the ordinary course of business are legally distinct. A review of a committee's qualified campaign expenses examines the terms and prices provided by the vendors to determine if any funds that were eventually paid to a vendor were for the purpose of seeking the nomination. On the other hand, an analysis of the extension of credit between a committee and a vendor examines whether the arrangement results in a contribution by the vendor to the committee. *Compare* 11 C.F.R. §§ 116.3(c)(1)-(3) with 11 C.F.R. §§ 9032.9(a)(1)-(3). The same facts, however, may be used to resolve both questions.

§§ 9038.2(c)(2) and (3). The Commission will not resolve the facts in the repayment context until it makes a final repayment determination and issues a statement of reasons. ⁵ See 11 C.F.R. § 9038.2(c)(4). In light of the factual overlap, the Office of General Counsel believes that it is appropriate to wait until the facts are resolved in the repayment context before making any recommendation regarding apparent violations by the Committee and IPLI. *Cf.* 11 C.F.R. § 9039.3(a)(2) (any information obtained during the course of an investigation under 26 U.S.C. § 9039(b) may be considered in connection with an enforcement action). Therefore, the Office of General Counsel recommends that the Commission take no action at this time on the IPLI extension of credit to the Committee. After the Commission makes a final repayment determination, the Office of General Counsel will submit a General Counsel's Report to the Commission with additional recommendations on ILPI's extension of credit to the Committee ⁶

II. FACTUAL AND LEGAL ANALYSIS - STAFF ADVANCES

The Act states that no person may make contributions to any candidate and his or her authorized political committees with respect to any election for Federal office which, in the aggregate, exceed \$1,000. 2 U.S.C. § 441a(a)(1)(A). No candidate or political committee shall knowingly accept any contribution that exceeds the contribution limitations. 2 U.S.C. § 441a(f). Moreover, 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

⁵ On September 12, 1995 and October 10, 1995, the Committee submitted written responses to the initial repayment determination. On February 7, 1996, the Committee made an oral presentation before the Commission. ⁶ The Office of General Counsel is currently reviewing the information obtained in the section 9039 inquiry and preparing a draft statement of reasons in support of the final repayment determination. As a result, this Office anticipates making a recommendation to the Commission on the extension of credit within the next few months.

behalf of a candidate, in violation of any limitation imposed on contributions and expenditures.

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The payment by an individual from his or her personal funds for the costs incurred in providing goods or services to, or obtaining goods or services that are used by or on behalf of a political committee is a contribution. 11 C.F.R. § 116.5(b). However, two exemptions exist. First, an individual may spend an aggregate of \$1,000 per election for personal transportation expenses on behalf of a candidate without such expenditures counted as contributions. 11 C.F.R. §§ 100.7(b)(8) and 116.5(b). Second, if an individual (who is not a volunteer) incurs expenses for his personal transportation expenses or for his usual and normal subsistence expenses, while traveling on behalf of a candidate or committee, the expenses will not be considered contributions to the committee as long as the committee reimburses the individual. 11 C.F.R. § 116.5(b); see also, Explanation and Justification for 11 C.F.R. § 116.5(b), 55 Fed. Reg. 26382-83 (June 27, 1989). However, the Committee must reimburse the individual within 60 days after the closing date of the billing statement on which the charge first appears if the individual uses a credit card. If a credit card is not used the Committee must make the reimbursement within 30 days after the date on which the expenses were incurred. Id. When an individual incurs expenses for the subsistence of others, a contribution occurs at the time the financial obligation is incurred, regardless of when the payment is due or when the individual pays the debt. Id.

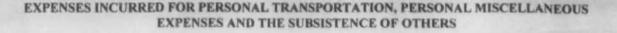
The audit found that the following 14 individuals made expenditures for personal transportation and miscellaneous expenses or for the subsistence of others: Lawrence A. Grigsby, Fred Newman, John B. Opdyke, Cathy Stewart, Marsha Plafkin, David Belmont, Jini L. Berman,

Eleanor Fain, Margaret E. Golden, Jeannine Hahn, James Ross, Nancy Ross', Margaret E.

Tanzosh and Robert Levy. Attachment 1. The following chart includes the date of the expenses, the range of expenses, the highest aggregate excessive amount, the date of the highest excessive amount, and the total excessive amounts for expenses incurred on behalf of others⁸:

⁸ Column No. 6 of above-described chart contains expenses that were *solely* for the subsistence of others which result in excessive contribution amounts. It should be noted, however, that some of the individuals listed incurred expenses for the subsistence of others in addition to incurring expenses for personal transportation and personal miscellaneous expenses.

⁷ Expenditures that have been attributed to Nancy Ross include credit card charges made to an American Express Company account for *The Rainbow Lobby*. Attachment 4. *The Rainbow Lobby*, as an entity, did not have an American Express account. However, pursuant to information that was provided by American Express in response to a Commission subpoena in the audit process, it was determined that Nancy Ross was the basic cardholder for an American Express account that was encoded with the words "*The Rainbow Lobby*." *Id.* Therefore, *The Rainbow Lobby* account was actually the personal account of Nancy Ross. In addition to Nancy Ross, the following individuals were authorized users of this account: Christopher Barclay, Amy Freeman, Kate Gardner, Ada Ivonne Vazquez, Todd Bentsen, Deborah Green, Bonnie Gildin, Shelly Karliner, and Jeffrey Aron. *Id.* Because Nancy Ross is the basic cardholder for this account. *Id.* However, since the Rainbow Lobby account was the personal account of Nancy Ross, the Office of General Counsel believes that it is appropriate to attribute all charges to Nancy Ross. *Cf.* 11 C.F.R. § 9035.2(a)(2) (any expenditures incurred using a credit card for which a publicly-financed candidate is personally liable may be attributable to the candidate's personal expenditure limitation).



NAME	DATES OF EXPENSES	RANGE	HIGHEST AGGREGATE AMOUNT	DATE OF HIGHEST EXCESSIVE AMOUNT	EXPENSES SOLELY FOR THE SUBSISTENCE OF OTHERS - EXCESSIVE CONTRIBUTION AMOUNTS
Belmont, David	06/26/91-09/07/92	\$ 1.59 - \$3,827.00	\$25,500.48	(5/18/92	N/A
Berman, Jini L	06/17/91-08/25/92	\$11.50 - 898.78	\$1,452.81	02/22/92	N/A
Fain, Eleanor	01/09/92-11/02/92	\$ 0.51 - 3,835.00	\$22,367.92	03/12/92	N/A
Golden, Margaret E.	04/04/92-10/22/92	\$ 1.30 - 1,600.00	\$838.70	03/06/92	N/A
Hahn, Jeannine	08/02/91-09/23/92	\$ 22.50 - 2,743.18	\$2,343.44	03/06/92	N/A
Ross, James	05/24/91-08/09/92	\$ 7.73 - 1,128.11	\$2,576.25	12/19/91	N/A
Ross, Nancy	06/01/91-09/05/92	\$ 10.55 - 6,409.77	\$19,455.23	05/30/92	N/A
Tanzosh, Margaret E.	02/12/92-10/13/92	\$ 0.46 - 1,732.98	\$8,933.27	09/15/92	N/A
Levy, Robert	N/A	N/A	N/A	N/A	\$ 636.78
Grigsby, Lawrence	N/A	N/A	N/A	N/A	\$1,345.25
Newman, Fred	N/A	N/A	N/A	N/A	\$930.58
Opdyke, John B.	N/A	N/A	N/A	N/A	\$8,340.14
Plafkin, Marsha	N/A	N/A	N/A	N/A	\$7,556.89
Stewart, Cathy	N/A	N/A	N/A	N/A	\$2,837.08

Pursuant to 11 C.F.R. § 100.7(b)(8), Mr. Belmont, Ms. Fain, Ms. Golden, Mr. Ross, and Ms. Ross could spend an aggregate amount of up to \$1,000 per election for their personal transportation expenses on behalf of Dr. Lenora B. Fulani without such expenditures counted as contributions to the Committee. *See* MUR 3974 (Kerry for President). Therefore, the highest excessive amounts for these individuals have been adjusted to reflect the actual amount of money that each of these individuals spent for personal transportation expenses. Moreover, Mr. Belmont, Ms. Berman, Ms. Fain, Ms. Golden, Ms. Hahn, Mr. Ross, Ms. Ross, Ms. Tanzosh incurred expenses that were not reimbursed within 30 or 60 days as required by the regulations. Attachment 1 at 12-52. Therefore, these expenditures are contributions to the Committee. 11 C.F.R. § 116.5(b)(2). Furthermore, Mr. Levy, Mr. Grigsby, Mr. Newman, Mr. Opdyke, Ms. Plafkin, and Ms. Stewart made contributions to the Committee by incurring expenses solely on the behalf of others. See 11 C.F.R.§ 116.5(b)(1). These expenses were contributions to the Committee at the time they were incurred. Id.

In its response to the Interim Audit Report, the Committee argued that it was a "grassroots, community-based operation" which required Dr. Fulani, its staff, and volunteers to travel constantly. Attachment 1 at 5; *see also* Attachment 2. The Committee also contended that 11 C.F.R. § 116.5 is unfair to the Committee because it discriminates against "smaller, grassroots campaigns involving candidates and their supporters who in large part neither have personal credit to use for their own travel and subsistence, much less connections to banking institutions that would enable the campaign to obtain 'commercial' credit lines." Attachment 1 at 6. As a result, the Committee stated that it was forced to use the credit cards of individuals for campaign-related expenses that were not for their own travel and subsistence.

The Committee further argued that the transactions in question did not violate 2 U.S.C. § 441a(a) because the credit card charges for the individuals were paid in the normal course of business without any request from the Commission or from any other outside party. *Id.* Moreover, the Committee asserts that these individuals did not intend to make contributions and that it told these individuals that they were responsible for payment of these charges. *Id.* Additionally, the Committee asserts that it reimbursed the individuals such expenses within 60 days, and that if an individual advanced money towards these expenses, it was done at the individual's own initiative. *Id.*

Moreover, the Committee stated that no enforcement action is warranted for several reasons. First, it argued that the 60 day rule for reimbursement should apply to non-personal

⁹ The Committee also asserts that it was denied an American Express corporate credit card. Attachment 1 at 6; see also Attachment 2.

travel and subsistence expenses. *Id.* Second, it asserted that non-credit card usage is virtually impossible and that it did not realize that 11 C.F.R. § 116.5 had been promulgated since the 1988 Presidential elections when it established its credit card procedures. *Id.* Additionally, the Committee urged the Commission to "take into consideration the particular operations of smaller, grassroots campaigns, and not apply in a rigid way regulations that are biased against the good-faith operations of campaigns such as ours." Attachment 1. at 7; *see also* Attachment 2.

The Commission promulgated section 116.5 out of concern that during critical periods in a campaign when an authorized committee is experiencing financial difficulties, individuals may attempt to circumvent the contribution limitations by paying committee expenses and not expecting reimbursement for substantial periods of time. Explanation and Justification of 11 C.F.R. § 116.5(b), 55 Fed. Reg. 26382 (June 27, 1989). Therefore, section 116.5 sets forth a specific time period for when a committee must reimburse an individual for his or her travel and subsistence. Any reimbursement that extends beyond the prescribed time period will be considered a contribution. 11 C.F.R. § 116.5(b). The Commission intended section 116.5 to provide a limited exception to the general rules governing contributions for an individual's personal transportation and subsistence. See Explanation and Justification of 11 C.F.R. § 116.5(b), 55 Fed. Reg. 26382 (June 27, 1989). Therefore, any expense incurred by an individual that is not his or her own travel and subsistence (such as for travel for others, meeting rooms or telephone services) will be considered a contribution. Id. These expenses are contributions to the Committee regardless of the time that is required for the Committee to reimburse the individual. Id. The fact that the Committee contends that it was a small

committee and could not obtain a corporate credit card or that the individuals did not intend to make a contribution is irrelevant for the purpose of this analysis.¹⁰

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The Office of General Counsel recommends that the Commission find reason to believe that the Lenora B. Fulani for President Committee and Francine Miller, as treasurer, violated 2 U.S.C. § 441a(f) by accepting excessive contributions totaling \$ 105,114.82.¹¹ In addition, the Office of General Counsel recommends that the Commission find reason to believe that David Belmont, Jini L. Berman, Eleanor Fain, Margaret E. Golden, Robert Levy, Lawrence A. Grigsby, Jeannine Hahn, Fred Newman, John B. Opdyke, Marsha Plafkin, James Ross, Nancy Ross, Cathy Stewart and Margaret E. Tanzosh violated 2 U.S.C. § 441a(a)(1)(A) by making excessive contributions. However, consistent with prior Commission action, this Office recommends that no further action be taken against these individuals. *See* MURs 4172 and 3991 (Commission found reason to believe individuals made excessive contributions to committees pursuant to 11 C.F.R. § 116.5, but took no further action with respect to the individuals). If the Commission approves this recommendation, the Office of General Counsel will send admonishment letters to these individuals.

¹⁰ Since individuals can use their personal credit cards for their own travel and subsistence, section 116.5 was intended to provide the Committee flexibility in situations where a committee may not want to provide corporate credit cards to its field staff. *Explanation and Justification of 11 C.F.R. § 116.5(b), 55 Fed. Reg. 2638 2 (June 27, 1989).* Therefore, the promulgation of 11 C.F.R. § 116.5 provided committees with greater opportunities to avoid the making of prohibited contributions by committee staff members. *Compare* 11 C.F.R. § 100.7(a)(1) with 11 C.F.R. § 116.5(b). It should be noted, however, that factors such as a committee's inability to obtain corporate credit credits, committee size, and/or intent (or the lack of intent) may be considered in mitigating the violation.

The amount of excessive contributions represents the sum total of the amounts stated in the abovedescribed chart (25,500.48 + 1,452.81 + 22,367.92 + 838.70 + 2,343.44 + 2,576.25 + 19,455.23 + 8,933.27 + 1,345.25 + 930.58 + 8,340.14 + 57,556.89 + 2,837.08 + 636.78).

III. DISCUSSION OF PROPOSED CONCILIATION

IV. RECOMMENDATIONS

 Take no action at this time with respect to the transactions between Lenora B. Fulani for President Committee and Francine Miller, as treasurer, and the International Peoples' Law Institution;

11

- Find reason to believe that David Belmont, Jini L. Berman, Eleanor Fain, Margaret E. Golden, Lawrence A. Grigsby, Jeannine Hahn, Fred Newman, John B. Opdyke, Marsha Plafkin, James Ross, Nancy Ross, Cathy Stewart, Margaret E. Tanzosh, and Robert Levy violated 2 U.S.C. § 441a(a)(1)(A), but take no further action and close the file with respect to these respondents;
- Find reason to believe that the Lenora B. Fulani for President Committee, and Francine Miller, as treasurer, violated 2 U.S.C. § 441a(f) for accepting excessive contributions through staff advances;
- Enter into conciliation with the Lenora B. Fulani for President Committee, and Francine Miller, as treasurer, prior to a finding probable cause to believe;
- Approve the attached conciliation agreement;

¹² A sample factual and legal analysis for individuals who made excessive contributions to the Committee is attached.

This amount has been rounded to the nearest thousand dollar amount.

6. Approve the attached sample factual and legal analysis; and

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7. Approve the appropriate letters.

awrence M. Noble Date General Counsel

Attachments

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- 1. Audit Referral
- 2. Committee Responses to the Interim Audit Report
- 3. Audit Division adjustment to Section 116.5 Staff Advances Calculations
- Letter from American Express dated October 1, 1993
- Audit Division adjustments to Section 116.5 Staff Advances pursuant to 11 C.F.R. § 100.7(b)(8)
- Proposed Conciliation Agreement for the Lenora B. Fulani for President and Francine Miller, as Treasurer
- Factual and Legal Analysis for the Lenora B. Fulani for President Committee, and Francine Miller, as Treasurer
- 8. Sample Factual and Legal Analysis for Individuals who made excessive contributions to the Lenora B. Fulani for President Committee

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

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Lenora B. Fulani for President Committee and Francine Miller, as treasurer; David Belmont; Jini L. Berman; Eleanor Fain; Margaret E. Golden; Lawrence A. Grigsby; Jeannine Hahn; Robert Levy; Fred Newman; John B. Opdyke; Marsha Plafkin; James Ross; Nancy Ross; Cathy Stewart; Margaret E. Tanzosh; International Peoples' Law Institution.

MUR 3969

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on May 24, 1996, the Commission decided by a vote of 5-0 to take the following actions in MUR 3969:

- 1. Take no action at this time with respect to the transactions between Lenora B. Fulani for President Committee and Francine Miller, as treasurer, and the International Peoples' Law Institution.
- 2. Find reason to believe that David Belmont, Jini L. Berman, Eleanor Fain, Margaret E. Golden, Lawrence A. Grigsby, Jeannine Hahn, Fred Newman, John B. Opdyke, Marsha Plafkin, James Ross, Nancy Ross, Cathy Stewart, Margaret E. Tanzosh, and Robert Levy violated 2 U.S.C § 441a(a)(1)(A), but take no further action and close the file with respect to these respondents.

(continued)

Federal Election Commission Certification for MUR 3969 May 24, 1996

- Find reason to believe that the Lenora B. 3. Fulani for President Committee and Francine Miller, as treasurer, violated 2 U.S.C. § 441a(f) for accepting excessive contributions through staff advances.
- Enter into conciliation with the Lenora B. 4. Fulani for President Committee and Francine Miller, as treasurer, prior to a finding probable cause to believe.
- Approve the conciliation agreement, as 5. recommended in the General Counsel's Report dated May 20, 1996.
- 6. Approve the sample factual and legal analysis, as recommended in the General Counsel's Report dated May 20, 1996.
- Approve the appropriate letters, as 7. recommended in the General Counsel's Report dated May 20, 1996.

Commissioners Aikens, Elliott, McDonald, McGarry, and

Thomas voted affirmatively for the decision.

Attest:

5-18-96

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NO

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Marsonie W. Commone

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

Deadline for vote:

Received in the Secretariat: Mon., May 20, 1996 3:48 p.m. Circulated to the Commission: Tues., May 21, 1996 11:00 a.m. Fri., May 24, 1996 4:00 p.m.

Page 2



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 7, 1996

Ms. Eleanor Fain 124 W. 60th Street New York, NY 10023

Re: M

MUR 3969 Eleanor Fain

Dear Ms. Fain:

On May 24, 1996, the Federal Election Commission found reason to believe that you violated 2 U.S.C. § 441a(a)(1)(A), a provision of the Federal Election Campaign Act of 1971, as amended, by making excessive contributions to the Lenora B. Fulani for President Committee. However, after considering the circumstances of this matter, the Commission also determined to take no further action and closed the file as it pertains to you. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Please be advised that your total amount of contributions to the Committee violated the contribution limitation at 2 U.S.C. § 441a(a)(1)(A). The Commission reminds you that "advances" for the costs incurred in providing goods or services to, or obtaining goods or services that are used by or on behalf of, a candidate or a political committee are considered contributions. See 11 C.F.R. § 116.5(b). You should take steps to ensure that you abide by the contribution limitation and this regulation in the future.

The file will be made public within 30 days after this matter has been closed with respect to all other respondents involved. You are advised that the confidentiality provisions of 2 U.S.C. \S 437g(a)(12)(A) still apply with respect to all respondents still involved in this matter.

If you have any questions, please contact Andre G. Pineda, the attorney assigned to this matter, at (202) 219-3690 or (800) 424-9530.

Sincerely, Ens Ellest

Lee Ann Elliott Chairman

Enclosure Factual and Legal Analysis

Celebrating the Commission's 20th Anniversary

YESTERDAY, TODAY AND TOMORROW DEDICATED TO KEEPING THE PUBLIC INFORMED

FEDERAL ELECTION COMMISSION FACTUAL AND LEGAL ANALYSIS

RESPONDENT:

Eleanor Fain

MUR: 3969

This matter was generated by information obtained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities pursuant to the Federal Election Campaign Act of 1971, as amended ("the Act"). 2 U.S.C. § 437g(a)(2). The information is based on contributions made to the Lenora B. Fulani for President Committee ("the Committee").

The Act states that no person may make contributions to any candidate and his or her authorized political committees with respect to any election for Federal office which, in the aggregate, exceed \$1,000. 2 U.S.C. § 441a(a)(1)(A).

The payment by an individual from his or her personal funds for the costs incurred in providing goods or services to, or obtaining goods or services that are used by or on behalf of a political committee is a contribution. 11 C.F.R. § 116.5(b). However, two exemptions exist. First, an individual may spend an aggregate of \$1,000 per election for personal transportation expenses on behalf of a candidate without such expenditures counted as contributions. 11 C.F.R. § 100.7(b)(8) and 116.5(b). Second, if an individual (who is not a volunteer) incurs expenses for his personal transportation expenses or for his usual and normal subsistence expenses, while traveling on behalf of a candidate or committee, the expenses will not be considered contributions to the committee as long as the committee reimburses the individual. 11 C.F.R. § 116.5(b); see also, Explanation and Justification for 11 C.F.R. § 116.5(b), 55 Fed. Reg.

26382-83 (June 27, 1989). However, the Committee must reimburse the individual within 60 days after the closing date of the billing statement on which the charge first appears if the individual uses a credit card. If a credit card is not used the Committee must make the reimbursement within 30 days after the date on which the expenses were incurred. *Id.* When an individual incurs expenses for the subsistence of others, a contribution occurs at the time the financial obligation is incurred, regardless of when the payment is due or when the individual pays the debt. *Id.*

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From January 9, 1992 to November 2, 1992, Eleanor Fain made expenditures for transportation and other miscellaneous costs. Since these expenditures were for herself and for the subsistence of others, these expenditures resulted in contributions to the Committee. 11 C.F.R. § 116.5(b). Because Ms. Fain paid for her own travel and subsistence costs with her personal credit card or by means other than her personal credit card, and because she was not reimbursed for these costs within 30 or 60 days, she made contributions to the Committee. *Id*. By making expenditures for the subsistence of others, Ms. Fain made contributions to the Committee at the time she incurred such expenditures. The above-stated expenditures ranged from \$.51 to \$3,835. On March 12, 1992, Ms. Fain's excessive amount reached its highest at \$ 22,367.92. *Id*.

Therefore, there is reason to believe that Eleanor Fain violated 2 U.S.C. § 441a(a)(1)(A) by knowingly making contributions in excess of the contribution limitations.

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Ms. Margaret E. Golden 18 Winfield Ave. Jersey City, NJ 07305 June 7, 1996

Re: M

MUR 3969 Margaret E. Golden

Dear Ms. Golden:

On May 24, 1996, the Federal Election Commission found reason to believe that you violated 2 U.S.C. § 441a(a)(1)(A), a provision of the Federal Election Campaign Act of 1971, as amended, by making excessive contributions to the Lenora B. Fulani for President Committee. However, after considering the circumstances of this matter, the Commission also determined to take no further action and closed the file as it pertains to you. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Please be advised that your total amount of contributions to the Committee violated the contribution limitation at 2 U.S.C. § 441a(a)(1)(A). The Commission reminds you that "advances" for the costs incurred in providing goods or services to, or obtaining goods or services that are used by or on behalf of, a candidate or a political committee are considered contributions. See 11 C.F.R. § 116.5(b). You should take steps to ensure that you abide by the contribution limitation and this regulation in the future.

The file will be made public within 30 days after this matter has been closed with respect to all other respondents involved. You are advised that the confidentiality provisions of 2 U.S.C. $\S 437g(a)(12)(A)$ still apply with respect to all respondents still involved in this matter.

If you have any questions, please contact Andre G. Pineda, the attorney assigned to this matter, at (202) 219-3690 or (800) 424-9530.

Sincerely,

and Ellest

Lee Ann Elliott Chairman

Enclosure Factual and Legal Analysis

Celebrating the Commission's 20th Anniversary

YESTERDAY, TODAY AND TOMORROW DEDICATED TO KEEPING THE PUBLIC INFORMED

FEDERAL ELECTION COMMISSION FACTUAL AND LEGAL ANALYSIS

RESPONDENT:

Margaret E. Golden

MUR: 3969

This matter was generated by information obtained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities pursuant to the Federal Election Campaign Act of 1971, as amended ("the Act"). 2 U.S.C. § 437g(a)(2). The information is based on contributions made to the Lenora B. Fulani for President Committee ("the Committee").

The Act states that no person may make contributions to any candidate and his or her authorized political committees with respect to any election for Federal office which, in the aggregate, exceed \$1,000. 2 U.S.C. § 441a(a)(1)(A).

The payment by an individual from his or her personal funds for the costs incurred in providing goods or services to, or obtaining goods or services that are used by or on behalf of a political committee is a contribution. 11 C.F.R. § 116.5(b). However, two exemptions exist. First, an individual may spend an aggregate of \$1,000 per election for personal transportation expenses on behalf of a candidate without such expenditures counted as contributions. 11 C.F.R. § 100.7(b)(8) and 116.5(b). Second, if an individual (who is not a volunteer) incurs expenses for his personal transportation expenses or for his usual and normal subsistence expenses, while traveling on behalf of a candidate or committee, the expenses will not be considered contributions to the committee as long as the committee reimburses the individual. 11 C.F.R. § 116.5(b); see also, Explanation and Justification for 11 C.F.R. § 116.5(b), 55 Fed. Reg.

26382-83 (June 27, 1989). However, the Committee must reimburse the individual within 60 days after the closing date of the billing statement on which the charge first appears if the individual uses a credit card. If a credit card is not used the Committee must make the reimbursement within 30 days after the date on which the expenses were incurred. *Id.* When an individual incurs expenses for the subsistence of others, a contribution occurs at the time the financial obligation is incurred, regardless of when the payment is due or when the individual pays the debt. *Id.*

From April 4, 1992 to October 22, 1992, Ms. Golden made expenditures for transportation, office supplies and other miscellaneous costs. Since these expenditures were for herself and for the subsistence of others, these expenditures resulted in contributions to the Committee. 11 C.F.R. § 116.5(b). Because Ms. Golden paid for her own travel and subsistence costs with her personal credit card or by means other than her personal credit card, and because she was not reimbursed for these costs within 30 or 60 days, she made contributions to the Committee. *Id.* By making expenditures for the subsistence of others, Ms. Golden made contributions to the Committee at the time she incurred such expenditures. The above-stated expenditures ranged from \$1.30 to \$1,600. On March 6, 1992, Ms. Golden's excessive amount reached its highest at \$838.70. *Id.*.

Therefore, there is reason to believe that Margaret E. Goiden violated 2 U.S.C. § 441a(a)(1)(A) by knowingly making contributions in excess of the contribution limitations.



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 7, 1996

Ms. Jeannine Hahn 210 W. 101 Street #11C New York, NY 10025

Re:

MUR 3969 Jeannine Hahn

Dear Ms. Hahn:

On May 24, 1996, the Federal Election Commission found reason to believe that you violated 2 U.S.C. § 441a(a)(1)(A), a provision of the Federal Election Campaign Act of 1971, as amended, by making excessive contributions to the Lenora B. Fulani for President Committee. However, after considering the circumstances of this matter, the Commission also determined to take no further action and closed the file as it pertains to you. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Please be advised that your total amount of contributions to the Committee violated the contribution limitation at 2 U.S.C. § 441a(a)(1)(A). The Commission reminds you that "advances" for the costs incurred in providing goods or services to, or obtaining goods or services that are used by or on behalf of, a candidate or a political committee are considered contributions. See 11 C.F.R. § 116.5(b). You should take steps to ensure that you abide by the contribution limitation and this regulation in the future.

The file will be made public within 30 days after this matter has been closed with respect to all other respondents involved. You are advised that the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) still apply with respect to all respondents still involved in this matter.

If you have any questions, please contact Andre G. Pineda, the attorney assigned to this matter, at (202) 219-3690 or (800) 424-9530.

Sincerely,

End Ellerth

Lee Ann Elliott Chairman

Enclosure Factual and Legal Analysis

Celebrating the Commission's 20th Anniversary

YESTERDAY, TODAY AND TOMORROW DEDICATED TO KEEPING THE PUBLIC INFORMED

FEDERAL ELECTION COMMISSION FACTUAL AND LEGAL ANALYSIS

RESPONDENT:

Jeannine Hahn

MUR: 3969

This matter was generated by information obtained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities pursuant to the Federal Election Campaign Act of 1971, as amended ("the Act"). 2 U.S.C. § 437g(a)(2). The information is based on contributions made to the Lenora B. Fulani for President Committee ("the Committee").

The Act states that no person may make contributions to any candidate and his or her authorized political committees with respect to any election for Federal office which, in the aggregate, exceed \$1,000. 2 U.S.C. § 441a(a)(1)(A).

The payment by an individual from his or her personal funds for the costs incurred in providing goods or services to, or obtaining goods or services that are used by or on behalf of a political committee is a contribution. 11 C.F.R. § 116.5(b). However, two exemptions exist. First, an individual may spend an aggregate of \$1,000 per election for personal transportation expenses on behalf of a candidate without such expenditures counted as contributions. 11 C.F.R. §§ 100.7(b)(8) and 116.5(b). Second, if an individual (who is not a volunteer) incurs expenses for his personal transportation expenses or for his usual and normal subsistence expenses, while traveling on behalf of a candidate or committee, the expenses will not be considered contributions to the committee as long as the committee reimburses the individual. 11 C.F.R. § 116.5(b); *see also, Explanation and Justification for 11 C.F.R. § 116.5(b), 55 Fed. Reg.*

26382-83 (June 27, 1989). However, the Committee must reimburse the individual within 60 days after the closing date of the billing statement on which the charge first appears if the individual uses a credit card. If a credit card is not used the Committee must make the reimbursement within 30 days after the date on which the expenses were incurred. *Id.* When an individual incurs expenses for the subsistence of others, a contribution occurs at the time the financial obligation is incurred, regardless of when the payment is due or when the individual pays the debt. *Id.*

From August 2, 1991 to September 23, 1992, Jeannine Hahn made expenditures for transportation and other miscellaneous costs. Since these expenditures were for herself and for the subsistence of others, these expenditures resulted in contributions to the Committee. 11 C.F.R. § 116.5(b). Because Ms. Hahn paid for her own travel and subsistence costs with her personal credit card or by means other than her personal credit card, and because she was not reimbursed for these costs within 30 or 60 days, she made contributions to the Committee. *Id.* By making expenditures for the subsistence of others, Ms. Hahn made contributions to the Committee at the time she incurred such expenditures. The above-stated expenditures ranged from \$22.50 to \$2,743.18. On March 6, 1992, Ms. Hahn's excessive amount reached its highest at \$2,343.44 *Id.*

Therefore, there is reason to believe that Jeannine Hahn violated 2 U.S.C. § 441a(a)(1)(A) by knowingly making contributions in excess of the contribution limitations.



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Ms. Cathy Stewart 240 Cabrini Blvd. New York, NY 10033 June 7, 1996

Re: MUR 3969 Cathy Stewart

Dear Ms. Stewart:

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On May 24, 1996, the Federal Election Commission found reason to believe that you violated 2 U.S.C. § 441a(a)(1)(A), a provision of the Federal Election Campaign Act of 1971, as amended, by making excessive contributions to the Lenora B. Fulani for President Committee. However, after considering the circumstances of this matter, the Commission also determined to take no further action and closed the file as it pertains to you. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Please be advised that your total amount of contributions to the Committee violated the contribution limitation at 2 U.S.C. § 441a(a)(1)(A). The Commission reminds you that "advances" for the costs incurred in providing goods or services to, or obtaining goods or services that are used by or on behalf of, a candidate or a political committee are considered contributions. See 11 C.F.R. § 116.5(b). You should take steps to ensure that you abide by the contribution limitation and this regulation in the future.

The file will be made public within 30 days after this matter has been closed with respect to all other respondents involved. You are advised that the confidentiality provisions of 2 U.S.C. $\S 437g(a)(12)(A)$ still apply with respect to all respondents still involved in this matter.

If you have any questions, please contact Andre G. Pineda, the attorney assigned to this matter, at (202) 219-3690 or (800) 424-9530.

Sincerely, Lee and Ellestt

Lee Ann Elliott Chairman

Enclosure Factual and Legal Analysis

Celebrating the Commission's 20th Anniversary

YESTERDAY, TODAY AND TOMORROW DEDICATED TO KEEPING THE PUBLIC INFORMED

RESPONDENT:

Cathy Stewart

MUR: 3969

This matter was generated by information obtained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities pursuant to the Federal Election Campaign Act of 1971, as amended ("the Act"). 2 U.S.C. § 437g(a)(2). The information is based on contributions made to the Lenora B. Fulani for President Committee ("the Committee").

The Act states that no person may make contributions to any candidate and his or her authorized political committees with respect to any election for Federal office which, in the aggregate, exceed \$1,000. 2 U.S.C. § 441a(a)(1)(A).

The payment by an individual from his or her personal funds for the costs incurred in providing goods or services to, or obtaining goods or services that are used by or on behalf of a political committee is a contribution. 11 C.F.R. § 116.5(b). However, two exemptions exist. First, an individual may spend an aggregate of \$1,000 per election for personal transportation expenses on behalf of a candidate without such expenditures counted as contributions. 11 C.F.R. § 100.7(b)(8) and 116.5(b). Second, if an individual (who is not a volunteer) incurs expenses for his personal transportation expenses or for his usual and normal subsistence expenses, while traveling on behalf of a candidate or committee, the expenses will not be considered contributions to the committee as long as the committee reimburses the individual. 11 C.F.R. § 116.5(b); see also, Explanation and Justification for 11 C.F.R. § 116.5(b), 55 Fed. Reg.

26382-83 (June 27, 1989). However, the Committee must reimburse the individual within 60 days after the closing date of the billing statement on which the charge first appears if the individual uses a credit card. If a credit card is not used the Committee must make the reimbursement within 30 days after the date on which the expenses were incurred. *Id.* When an individual incurs expenses for the subsistence of others, a contribution occurs at the time the financial obligation is incurred, regardless of when the payment is due or when the individual pays the debt. *Id.*

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From September 14, 1991 to August 21, 1992, Cathy Stewart made expenditures for transportation and the subsistence of others. These expenditures resulted in contributions to the Committee. 11 C.F.R. § 116.5(b). By making these expenditures, Ms. Stewart made contributions to the Committee at the time she incurred such expenditures. The above-stated expenditures ranged from \$ 4.90 to \$1,469.41. On December 28, 1991, Ms. Stewart's excessive amount reached its highest at \$2,837.08.

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Therefore, there is reason to believe that Cathy Stewart violated 2 U.S.C. § 441a(a)(1)(A) by knowingly making contributions in excess of the contribution limitations.



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 2046.1

June 7, 1996

Ms. Marsha Plafkin 125 W. 106th Street #5B New York, NY 10025

> Re: MUR 3969 Marsha Plafkin

Dear Ms. Plafkin:

On May 24, 1996, the Federal Election Commission found reason to believe that you violated 2 U.S.C. § 441a(a)(1)(A), a provision of the Federal Election Campaign Act of 1971, as amended, by making excessive contributions to the Lenora B. Fulani for President Committee. However, after considering the circumstances of this matter, the Commission also determined to take no further action and closed the file as it pertains to you. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Please be advised that your total amount of contributions to the Committee violated the contribution limitation at 2 U.S.C. § 441a(a)(1)(A). The Commission reminds you that "advances" for the costs incurred in providing goods or services to, or obtaining goods or services that are used by or on behalf of, a candidate or a political committee are considered contributions. See 11 C.F.R. § 116.5(b). You should take steps to ensure that you abide by the contribution limitation and this regulation in the future.

The file will be made public within 30 days after this matter has been closed with respect to all other respondents involved. You are advised that the confidentiality provisions of 2 U.S.C. \S 437g(a)(12)(A) still apply with respect to all respondents still involved in this matter.

If you have any questions, please contact Andre G. Pineda, the attorney assigned to this matter, at (202) 219-3690 or (800) 424-9530.

Sincerely,

e ann Ellest

Lee Ann Elliott Chairman

Enclosure Factual and Legal Analysis

Celebrating the Commission's 20th Annix ersary

YESTERDAY, TODAY AND TOMORROW DEDICATED TO KEEPING THE PUBLIC INFORMED

RESPONDENT:

Marsha Plafkin

MUR: 3969

This matter was generated by information obtained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities pursuant to the Federal Election Campaign Act of 1971, as amended ("the Act"). 2 U.S.C. § 437g(a)(2). The information is based on contributions made to the Lenora B. Fulani for President Committee ("the Committee").

The Act states that no person may make contributions to any candidate and his or her authorized political committees with respect to any election for Federal office which, in the aggregate, exceed \$1,000. 2 U.S.C. § 441a(a)(1)(A).

The payment by an individual from his or her personal funds for the costs incurred in providing goods or services to, or obtaining goods or services that are used by or on behalf of a political committee is a contribution. 11 C.F.R. § 116.5(b). However, two exemptions exist. First, an individual may spend an aggregate of \$1,000 per election for personal transportation expenses on behalf of a candidate without such expenditures counted as contributions. 11 C.F.R. § 100.7(b)(8) and 116.5(b). Second, if an individual (who is not a volunteer) incurs expenses for his personal transportation expenses or for his usual and normal subsistence expenses, while traveling on behalf of a candidate or committee, the expenses will not be considered contributions to the committee as long as the committee reimburses the individual. 11 C.F.R. § 116.5(b); see also, Explanation and Justification for 11 C.F.R. § 116.5(b), 55 Fed. Reg.

26382-83 (June 27, 1989). However, the Committee must reimburse the individual within 60 days after the closing date of the billing statement on which the charge first appears if the individual uses a credit card. If a credit card is not used the Committee must make the reimbursement within 30 days after the date on which the expenses were incurred. *Id.* When an individual incurs expenses for the subsistence of others, a contribution occurs at the time the financial obligation is incurred, regardless of when the payment is due or when the individual pays the debt. *Id.*

From September 11, 1991 to November 2, 1992, Marsha Plafkin made expenditures for transportation and the subsistence of others. These expenditures resulted in contributions to the Committee. 11 C.F.R. § 116.5(b). By making these expenditures, Ms. Plafkin made contributions to the Committee at the time she incurred such expenditures. The above-stated expenditures ranged from \$ 6.50 to \$1,640.50. On September 3, 1992, Ms. Plafkin's excessive amount reached its highest at \$7,556.89.

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Therefore, there is reason to believe that Marsha Plafkin violated 2 U.S.C. § 441a(a)(1)(A) by knowingly making contributions in excess of the contribution limitations.



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 7, 1998

Mr. Lawrence Grigsby 4116 Don Diablo Drive Los Angeles, CA 90008-4306

Re:

MUR 3969 Lawrence Grigsby

Dear Mr. Grigsby:

On May 24, 1996, the Federal Election Commission found reason to believe that you violated 2 U.S.C. § 441a(a)(1)(A), a provision of the Federal Election Campaign Act of 1971, as amended, by making excessive contributions to the Lenora B. Fulani for President Committee. However, after considering the circumstances of this matter, the Commission also determined to take no further action and closed the file as it pertains to you. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Please be advised that your total amount of contributions to the Committee violated the contribution limitation at 2 U.S.C. § 441a(a)(1)(A). The Commission reminds you that "advances" for the costs incurred in providing goods or services to, or obtaining goods or services that are used by or on behalf of, a candidate or a political committee are considered contributions. See 11 C.F.R. § 116.5(b). You should take steps to ensure that you abide by the contribution limitation and this regulation in the future.

The file will be made public within 30 days after this matter has been closed with respect to all other respondents involved. You are advised that the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) still apply with respect to all respondents still involved in this matter.

If you have any questions, please contact Andre G. Pineda, the attorney assigned to this matter, at (202) 219-3690 or (800) 424-9530.

Sincerely,

ann Ellert

e Ann Elliott Chairman

Enclosure Factual and Legal Analysis

Celebrating the Commission's 20th Anniversary

YESTERDAY, TODAY AND TOMORROW DEDICATED TO KEEPING THE PUBLIC INFORMED

RESPONDENT:

Lawrence A. Grigsby

MUR: 3969

This matter was generated by information obtained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities pursuant to the Federal Election Campaign Act of 1971, as amended ("the Act"). 2 U.S.C. § 437g(a)(2). The information is based on contributions made to the Lenora B. Fulani for President Committee ("the Committee").

The Act states that no person may make contributions to any candidate and his or her authorized political committees with respect to any election for Federal office which, in the aggregate, exceed \$1,000. 2 U.S.C. § 441a(a)(1)(A).

The payment by an individual from his or her personal funds for the costs incurred in providing goods or services to, or obtaining goods or services that are used by or on behalf of a political committee is a contribution. 11 C.F.R. § 116.5(b). However, two exemptions exist. First, an individual may spend an aggregate of \$1,000 per election for personal transportation expenses on behalf of a candidate without such expenditures counted as contributions. 11 C.F.R. §§ 100.7(b)(8) and 116.5(b). Second, if an individual (who is not a volunteer) incurs expenses for his personal transportation expenses or for his usual and normal subsistence expenses, while traveling on behalf of a candidate or committee, the expenses will not be considered contributions to the committee as long as the committee reimburses the individual. 11 C.F.R. § 116.5(b); *see also, Explanation and Justification for 11 C.F.R. § 116.5(b), 55 Fed. Reg.*

26382-83 (June 27, 1989). However, the Committee must reimburse the individual within 60 days after the closing date of the billing statement on which the charge first appears if the individual uses a credit card. If a credit card is not used the Committee must make the reimbursement within 30 days after the date on which the expenses were incurred. *Id.* When an individual incurs expenses for the subsistence of others, a contribution occurs at the time the financial obligation is incurred, regardless of when the payment is due or when the individual pays the debt. *Id.*

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From September 2, 1991 to October 11, 1991, Lawrence A. Grigsby made expenditures for transportation and the subsistence of others. These expenditures resulted in contributions to the Committee. 11 C.F.R. § 116.5(b). By making these expenditures, Mr. Grigsby made contributions to the Committee at the time he incurred such expenditures. The above-stated expenditures ranged from \$263.33 to \$1,832.92. On October 11, 1992, Mr. Grigsby's excessive. amount reached its highest at \$1,345.25.

Therefore, there is reason to believe that Lawrence A. Grigsby violated 2 U.S.C. § 441a(a)(1)(A) by knowingly making contributions in excess of the contribution limitations.

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 7, 1996

Ms. Francine Miller Lenora B. Fulani for President Committee 50 West 77th Street Apt. #10J New York, NY 10024

> RE: MUR 3969 Lenora B. Fulani for President Committee Francine Miller, as Treasurer

Dear Ms. Miller:

On May 24, 1996, the Federal Election Commission found that there is reason to believe that Lenora B. Fulani for President Committee ("the Committee") and you, as treasurer, violated 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") with respect to contributions received from David Belmont, Jini L. Berman, Eleanor Fain, Margaret E. Golden, Lawrence A. Grigsby, Jeannine Hahn, Robert Levy, Fred Newman, John B. Opdyke, Marsha Plafkin, James Ross, Nancy Ross, Cathy Stewart, and Margaret E. Tanzosh. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

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 additional information, 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.

If you are interested in expediting the resolution of this matter by pursing 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.

> Celebrating the Commission's 20th Anniversarv YESTERDAY, TODAY AND TOMORROW DEDICATED TO KEEPINAG THE PUBLIC INFORMED

Letter to Francine Miller Lenora B. Fulani for President Committee Page -2-

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 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 Andre G. Pineda, the attorney assigned to this matter, at (202) 219-3690.

Sincerely,

Lee ann Elliott

Lee Ann Elliott Chairman

Enclosures Factual and Legal Analysis Procedures Designation of Counsel Form Conciliation Agreement

cc: Lenora B. Fulani

11.

RESPONDENTS:

Lenora B. Fulani for President Committee Francine Miller, as Treasurer

I. BACKGROUND

The Lenora B. Fulani for President Committee ("the Committee") is the authorized committee of Dr. Lenora B. Fulani, a candidate for the 1992 presidential nomination of a national party and four separate party committees in four states. ¹ The Committee received \$2,013,323 in matching funds from the United States Treasury. 26 U.S.C. §§ 9033 and 9034. Pursuant to 26 U.S.C. § 9038(a), the Commission conducted an audit and examination of the Committee's receipts, disbursements, and qualified campaign expenses. In addition, the audit included an evaluation of whether the Committee complied with the Federal Election Campaign Act, as amended ("the Act"). 11 C.F.R. § 9038.1(c)(1)(i) and (iv). This matter was generated from information obtained during the audit of the Committee. 11 C.F.R. § 9038.1(e)(2).

II. FACTUAL AND LEGAL ANALYSIS - STAFF ADVANCES

The Act states that no person may make contributions to any candidate and his or her authorized political committees with respect to any election for Federal office which, in the aggregate, exceed \$1,000. 2 U.S.C. § 441a(a)(1)(A). No candidate or political committee shall knowingly accept any contribution that exceeds the contribution

The Committee registered with the Commission on March 11, 1991.

limitations. 2 U.S.C. § 441a(f). Moreover, 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. *Id.*

The payment by an individual from his or her personal funds for the costs incurred in providing goods or services to, or obtaining goods or services that are used by or on behalf of a political committee is a contribution. 11 C.F.R. § 116.5(b). However, two exemptions exist. First, an individual may spend an aggregate of \$1,000 per election for personal transportation expenses on behalf of a candidate without such expenditures counted as contributions. 11 C.F.R. §§ 100.7(b)(8) and 116.5(b). Second, if an individual (who is not a volunteer) incurs expenses for his personal transportation expenses or for his usual and normal subsistence expenses, while traveling on behalf of a candidate or committee, the expenses will not be considered contributions to the committee as long as the committee reimburses the individual. 11 C.F.R. § 116.5(b); see also, Explanation and Justification for 11 C.F.R. § 116.5(b), 55 Fed. Reg. 26382-83 (June 27, 1989). However, the Committee must reimburse the individual within 60 days after the closing date of the billing statement on which the charge first appears if the individual uses a credit card. If a credit card is not used the Committee must make the reimbursement within 30 days after the date on which the expenses were incurred. Id. When an individual incurs expenses for the subsistence of others, a contribution occurs at the time the financial obligation is incurred, regardless of when the payment is due or when the individual pays the debt. Id.

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The audit found that the following 14 individuals made expenditures for personal transportation and miscellaneous expenses or for the subsistence of others: Lawrence A. Grigsby, Fred Newman, John B. Opdyke, Cathy Stewart, Marsha Plafkin, David Belmont, Jini L. Berman, Eleanor Fain, Margaret E. Golden, Jeannine Hahn, James Ross, Nancy Ross², Margaret E. Tanzosh and Robert Levy. The following chart includes the date of the expenses, the range of expenses, the highest aggregate excessive amount, the date of the highest excessive amount, and the total excessive amounts for expenses incurred on behalf of others³:

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Expenditures that have been attributed to Nancy Ross include credit card charges made to an American Express Company account for *The Rainbow Lobby*. *The Rainbow Lobby*, as an entity, did not have an American Express account. However, pursuant to information that was provided by American Express in response to a Commission subpoena in the audit process, it was determined that Nancy Ross was the basic cardholder for an American Express account that was encoded with the words "*The Rainbow Lobby*." Therefore, *The Rainbow Lobby* account was actually the personal account of Nancy Ross. In addition to Nancy Ross, the following individuals were authorized users of this account: Christopher Barclay, Amy Freeman, Kate Gardner, Ada Ivonne Vazquez, Todd Bentsen, Deborah Green, Bonnie Gildin, Shelly Kartiner, and Jeffrey Aron. Because Nancy Ross is the basic cardholder for this account. However, since the Rainbow Lobby account was the personal account of Nancy Ross, the Commission believes that it is appropriate to attribute all charges to Nancy Ross. *Cf.* 11 C.F.R. § 9035.2(a)(2) (any expenditures incurred using a credit card for which a publicly-financed candidate is personally liable may be attributable to the candidate's personal expenditure limitation).

³ Column No. 6 of above-described chart contains expenses that were *solely* for the subsistence of others which result in excessive contribution amounts. It should be noted, however, that some of the individuals listed incurred expenses for the subsistence of others in addition to incurring expenses for personal transportation and personal miscellaneous expenses.

NAME	DATES OF EXPENSES	RANGE	HIGHEST AGGREGATE AMOUNT	DATE OF HIGHEST EXCESSIVE AMOUNT	EXPENSES SOLELY FOR THE SUBSISTENCE OF OTHERS - EXCESSIVE CONTRIBUTION AMOUNTS
Belmont, David	06/26/91-09/07/92	\$ 1.59 - \$3,827.00	\$25,500.48	05/18/92	N/A
Berman, Jini L.	06/17/91-08/25/92	\$11.50 - 898.78	\$1,452.81	02/22/92	N/A
Fain, Eleanor	01/09/92-11/02/92	\$ 0.51 - 3,835.00	\$22,367.92	03/12/92	N /A
Golden, Margaret E.	04/04/92-10/22/92	\$1.30 - 1,600.00	\$838.70	03/06/92	N/A
Hahn, Jeannine	08/02/91-09/23/92	\$ 22.50 - 2,743.18	\$2,343.44	03/06/92	N/A
Ross, James	05/24/91-08/09/92	\$ 7.73 - 1,128.11	\$2,576.25	12/19/91	N/A
Ross, Nancy	06/01/91-09/05/92	\$ 10.55 - 6,409.77	\$19,455.23	05/30/92	N/A
Tanzosh, Margaret E.	02/12/92-10/13/92	\$ 0.46 - 1,732.98	\$8,933.27	09/15/92	N/A
Levy, Robert	N/A	N/A	N/A	N/A	\$ 636.78
Grigsby, Lawrence	N/A	N/A	N/A	NIA	\$1,345.25
Newman, Fred	NIA	N/A	N/A	N/A	\$930.58
Opdyke, John B.	N/A	N/A	NIA	N/A	\$8,340.14
Platin Marsha	N/A	N/A	N/A	N/A	\$7 556 89

N/A

N/A

N/A

\$2,837.08

N/A

Stewart, Cathy

EXPENSES INCURRED FOR PERSONAL TRANSPORTATION, PERSONAL MISCELLANEOUS EXPENSES AND THE SUBSISTENCE OF OTHERS

Pursuant to 11 C.F.R. § 100.7(b)(8), Mr. Belmont, Ms. Fain, Ms. Golden, Mr. Ross, and Ms. Ross could spend an aggregate amount of up to \$1,000 per election for their personal transportation expenses on behalf of Dr. Lenora B. Fulani without such expenditures counted as contributions to the Committee. *See* MUR 3974 (Kerry for President). Therefore, the highest excessive amounts for these individuals have been adjusted to reflect the actual amount of money that each of these individuals spent for personal transportation expenses. Moreover, Mr. Belmont, Ms. Berman, Ms. Fain, Ms. Golden, Ms. Hahn, Mr. Ross, Ms. Ross, Ms. Tanzosh incurred expenses that were not reimbursed within 30 or 60 days as required by the regulations. Therefore, these expenditures are contributions to the Committee. 11 C.F.R. § 116.5(b)(2). Furthermore, Mr. Levy, Mr. Grigsby, Mr. Newman, Mr. Odpyke, Ms. Plafkin, and Ms. Stewart made contributions to the Committee by incurring expenses solely on the behalf of others. *See* 11 C.F.R. § 116.5(b)(1). These expenses were contributions to the Committee at the time they were incurred. *Id.*

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In its response to the Interim Audit Report, the Committee argued that it was a "grassroots, community-based operation" which required Dr. Fulani, its staff, and volunteers to travel constantly. The Committee also contended that 11 C.F.R. § 116.5 is unfair to the Committee because it discriminates against "smaller, grassroots campaigns involving candidates and their supporters who in large part neither have personal credit to use for their own travel and subsistence, much less connections to banking institutions that would enable the campaign to obtain 'commercial' credit lines." As a result, the Committee stated that it was forced to use the credit cards of individuals for campaignrelated expenses that were not for their own travel and subsistence.⁴

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The Committee further argued that the transactions in question did not violate 2 U.S.C. § 441a(a) because the credit card charges for the individuals were paid in the normal course of business without any request from the Commission or from any other outside party. Moreover, the Committee asserts that these individuals did not intend to make contributions and that it told these individuals that they were responsible for payment of these charges. Additionally, the Committee asserts that it reimbursed the individuals such expenses within 60 days, and that if an individual advanced money towards these expenses, it was done at the individual's own initiative.

Moreover, the Committee stated that no enforcement action is warranted for several reasons. First, it argued that the 60 day rule for reimbursement should apply to

The Committee also asserts that it was denied an American Express corporate credit card.

non-personal travel and subsistence expenses. Second, it asserted that non-credit card usage is virtually impossible and that it did not realize that 11 C.F.R. § 116.5 had been promulgated since the 1988 Presidential elections when it established its credit card procedures. Additionally, the Committee urged the Commission to "take into consideration the particular operations of smaller, grassroots campaigns, and not apply in a rigid way regulations that are biased against the good-faith operations of campaigns such as ours."

The Commission promulgated section 116.5 out of concern that during critical periods in a campaign when an authorized committee is experiencing financial difficulties, individuals may attempt to circumvent the contribution limitations by paying committee expenses and not expecting reimbursement for substantial periods of time. Explanation and Justification of 11 C.F.R. § 116.5(b), 55 Fed. Reg. 26382 (June 27, 1989). Therefore, section 116.5 sets forth a specific time period for when a committee must reimburse an individual for his or her travel and subsistence. Any reimbursement that extends beyond the prescribed time period will be considered a contribution. 11 C.F.R. § 116.5(b). The Commission intended section 116.5 to provide a limited exception to the general rules governing contributions for an individual's personal transportation and subsistence. See Explanation and Justification of 11 C.F.R. § 116.5(b), 55 Fed. Reg. 26382 (June 27, 1989). Therefore, any expense incurred by an individual that is not his or her own travel and subsistence (such as for travel for others, meeting rooms or telephone services) will be considered a contribution. Id. These expenses are contributions to the Committee regardless of the time that is required for the

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Committee to reimburse the individual. *Id.* The fact that the Committee contends that it was a small committee and could not obtain a corporate credit card or that the individuals did not intend to make a contribution is irrelevant for the purpose of this analysis.⁵

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Accordingly, the Commission has determined that there is reason to believe that the Lenora B. Fulani for President Committee and Francine Miller, as treasurer, violated 2 U.S.C. § 441a(f) by accepting excessive contributions totaling \$ 105,114.82.⁶

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⁵ Since individuals can use their personal credit cards for their own travel and subsistence, section 116.5 was intended to provide the Committee flexibility in situations where a committee may not want to provide corporate credit cards to its field staff. Explanation and Justification of 11 C.F.R. § 116.5(b), 55 Fed. Reg. 2638 2 (June 27, 1989). Therefore, the promulgation of 11 C.F.R. § 116.5 provided committees with greater opportunities to avoid the making of prohibited contributions by committee staff members. Compare 11 C.F.R. § 100.7(a)(1) with 11 C.F.R. § 116.5(b).

The amount of excessive contributions represents the sum total of the amounts stated in the abovedescribed chart (\$25,500.48 + \$1,452.81 + \$22,367.92 + \$838.70 + \$2,343.44 + \$2,576.25 + \$19,455.23 + \$8,933.27 + \$1,345.25 + \$930.58 + \$8,340.14 + \$7,556.89 + \$2,837.08 + \$636.78).



FEDERAL ELECTION COMMISSION WASHINGTON, D.C. 20463

June 7, 1996

Dr. Fred Newman 175 W. 72nd Street New York, NY 10023

Re:

MUR 3969 Fred Newman

Dear Dr. Newman:

On May 24, 1996, the Federal Election Commission found reason to believe that you violated 2 U.S.C. § 441a(a)(1)(A), a provision of the Federal Election Campaign Act of 1971, as amended, by making excessive contributions to the Lenora B. Fulani for President Committee. However, after considering the circumstances of this matter, the Commission also determined to take no further action and closed the file as it pertains to you. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Please be advised that your total amount of contributions to the Committee violated the contribution limitation at 2 U.S.C. § 441a(a)(1)(A). The Commission reminds you that "advances" for the costs incurred in providing goods or services to, or obtaining goods or services that are used by or on behalf of, a candidate or a political committee are considered contributions. See 11 C.F.R. § 115.5(b). You should take steps to ensure that you abide by the contribution limitation and this regulation in the future.

The file will be made public within 30 days after this matter has been closed with respect to all other respondents involved. You are advised that the confidentiality provisions of 2 U.S.C. \S 437g(a)(12)(A) still apply with respect to all respondents still involved in this matter.

If you have any questions, please contact Andre G. Pineda, the attorney assigned to this matter, at (202) 219-3690 or (800) 424-9530.

Sincerely,

ann Ellestt

Lee Ann Elliott Chairman

Enclosure Factual and Legal Analysis

Celebrating the Commission's 20th Anniversary

YESTERDAY, TODAY AND TOMORROW DEDICATED TO KEEPING THE PUBLIC INFORMED

RESPONDENT:

Fred Newman

MUR: 3969

This matter was generated by information obtained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities pursuant to the Federal Election Campaign Act of 1971, as amended ("the Act"). 2 U.S.C. § 437g(a)(2). The information is based on contributions made to the Lenora B. Fulani for President Committee ("the Committee").

The Act states that no person may make contributions to any candidate and his or her authorized political committees with respect to any election for Federal office which, in the aggregate, exceed \$1,000. 2 U.S.C. § 441a(a)(1)(A).

The payment by an individual from his or her personal funds for the costs incurred in providing goods or services to, or obtaining goods or services that are used by or on behalf of a political committee is a contribution. 11 C.F.R. § 116.5(b). However, two exemptions exist. First, an individual may spend an aggregate of \$1,000 per election for personal transportation expenses on behalf of a candidate without such expenditures counted as contributions. 11 C.F.R. § 100.7(b)(8) and 116.5(b). Second, if an individual (who is not a volunteer) incurs expenses for his personal transportation expenses or for his usual and normal subsistence expenses, while traveling on behalf of a candidate or committee, the expenses will not be considered contributions to the committee as long as the committee reimburses the individual. 11 C.F.R, § 116.5(b); see also, Explanation and Justification for 11 C.F.R. § 116.5(b), 55 Fed. Reg.

26382-83 (June 27, 1989). However, the Committee must reimburse the individual within 60 days after the closing date of the billing statement on which the charge first appears if the individual uses a credit card. If a credit card is not used the Committee must make the reimbursement within 30 days after the date on which the expenses were incurred. *Id.* When an individual incurs expenses for the subsistence of others, a contribution occurs at the time the financial obligation is incurred, regardless of when the payment is due or when the individual pays the debt. *Id.*

From January 6, 1992 to January 11, 1992, Fred Newman made expenditures for transportation and the subsistence of others. These expenditures resulted in contributions to the Committee. 11 C.F.R. § 116.5(b). By making these expenditures, Dr. Newman made contributions to the Committee at the time he incurred such expenditures. The above-stated expenditures ranged from \$257.88 to \$1,422.70. On January 11, 1992, Dr. Newman's excessive amount reached its highest at \$930.58.

Therefore, there is reason to believe that Fred Newman violated 2 U.S.C. § 441a(a)(1)(A) by knowingly making contributions in excess of the contribution limitations.



FEDERAL ELECTION COMMISSION WASHINGTON, D.C. 20463

June 7, 1996

Mr. James Ross RD 2, Box 540 Middlebury, VT 05753-9315

> Re: MUR 3969 James Ross

Dear Mr. Ross:

On May 24, 1996, the Federal Election Commission found reason to believe that you violated 2 U.S.C. § 441a(a)(1)(A), a provision of the Federal Election Campaign Act of 1971, as amended, by making excessive contributions to the Lenora B. Fulani for President Committee. However, after considering the circumstances of this matter, the Commission also determined to take no further action and closed the file as it pertains to you. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Please be advised that your total amount of contributions to the Committee violated the contribution limitation at 2 U.S.C. § 441a(a)(1)(A). The Commission reminds you that "advances" for the costs incurred in providing goods or services to, or obtaining goods or services that are used by or on behalf of, a candidate or a political committee are considered contributions. See 11 C.F.R. § 116.5(b). You should take steps to ensure that you abide by the contribution limitation and this regulation in the future.

The file will be made public within 30 days after this matter has been closed with respect to all other respondents involved. You are advised that the confidentiality provisions of 2 U.S.C. \S 437g(a)(12)(A) still apply with respect to all respondents still involved in this matter.

If you have any questions, please contact Andre G. Pineda, the attorney assigned to this matter, at (202) 219-3690 or (800) 424-9530.

Sincerely,

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Lee Ann Elliott Chairman

Enclosure Factual and Legal Analysis

Celebrating the Commission's 20th Anniversary

YESTERDAY, TODAY AND TOMORROW DEDICATED TO KEEPING THE PUBLIC INFORMED

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RESPONDENT:

James Ross

MUR: 3969

This matter was generated by information obtained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities pursuant to the Federal Election Campaign Act of 1971, as amended ("the Act"). 2 U.S.C. § 437g(a)(2). The information is based on contributions made to the Lenora B. Fulani for President Committee ("the Committee").

The Act states that no person may make contributions to any candidate and his or her authorized political committees with respect to any election for Federal office which, in the aggregate, exceed \$1,000. 2 U.S.C. § 441a(a)(1)(A).

The payment by an individual from his or her personal funds for the costs incurred in providing goods or services to, or obtaining goods or services that are used by or on behalf of a political committee is a contribution. 11 C.F.R. § 116.5(b). However, two exemptions exist. First, an individual may spend an aggregate of \$1,000 per election for personal transportation expenses on behalf of a candidate without such expenditures counted as contributions. 11 C.F.R. §§ 100.7(b)(8) and 116.5(b). Second, if an individual (who is not a volunteer) incurs expenses for his personal transportation expenses or for his usual and normal subsistence expenses, while traveling on behalf of a candidate or committee, the expenses will not be considered contributions to the committee as long as the committee reimburses the individual. 11 C.F.R. § 116.5(b); see also, Explanation and Justification for 11 C.F.R. § 116.5(b), 55 Fed. Reg.

26382-83 (June 27, 1989). However, the Committee must reimburse the individual within 60 days after the closing date of the billing statement on which the charge first appears if the individual uses a credit card. If a credit card is not used the Committee must make the reimbursement within 30 days after the date on which the expenses were incurred. *Id.* When an individual incurs expenses for the subsistence of others, a contribution occurs at the time the financial obligation is incurred, regardless of when the payment is due or when the individual pays the debt. *Id.*

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From May 24, 1991 to August 9, 1992, James Ross made expenditures for transportation and other miscellaneous costs. Since these expenditures were for himself and for the subsistence of others, these expenditures resulted in contributions to the Committee. 11 C.F.R. § 116.5(b). Because Mr. Ross paid for his own travel and subsistence costs with his personal credit card or by means other than his personal credit card, and because he was not reimbursed for these costs within 30 or 60 days, he made contributions to the Committee. *Id.* By making expenditures for the subsistence of others, Mr. Ross made contributions to the Committee at the time he incurred such expenditures. The above-stated expenditures ranged from \$7.73 to \$1,128.11. On December 19, 1991, Mr. Ross' excessive amount reached its highest at \$2,576.25. *Id.*

Therefore, there is reason to believe that James Ross violated 2 U.S.C.

§ 441a(a)(1)(A) by knowingly making contributions in excess of the contribution limitations.



FEDERAL ELECTION COMMISSION WASHINGTON, D.C. 20463

June 7, 1996

Ms. Nancy Ross 1730 T Street, N.W. Washington, D.C. 20009

> Re: MUR 3969 Nancy Ross

Dear Ms. Ross:

On May 24, 1996, the Federal Election Commission found reason to believe that you violated 2 U.S.C. § 441a(a)(1)(A), a provision of the Federal Election Campaign Act of 1971, as amended, by making excessive contributions to the Lenora B. Fulani for President Committee. However, after considering the circumstances of this matter, the Commission also determined to take no further action and closed the file as it pertains to you. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Please be advised that your total amount of contributions to the Committee violated the contribution limitation at 2 U.S.C. § 441a(a)(1)(A). The Commission reminds you that "advances" for the costs incurred in providing goods or services to, or obtaining goods or services that are used by or on behalf of, a candidate or a political committee are considered contributions. See 11 C.F.R. § 116.5(b). You should take steps to ensure that you abide by the contribution limitation and this regulation in the future.

The file will be made public within 30 days after this matter has been closed with respect to all other respondents involved. You are advised that the confidentiality provisions of 2 U.S.C. \S 437g(a)(12)(A) still apply with respect to all respondents still involved in this matter.

If you have any questions, please contact Andre G. Pineda, the attorney assigned to this matter, at (202) 219-3690 or (800) 424-9530.

Sincerely,

na allist

Lee Ann Elliott Chairman

Enclosure Factual and Legal Analysis

Celebrating the Commission's 20th Anniversary

YESTERDAY, TODAY AND TOMORROW DEDICATED TO KEEPING THE PUBLIC INFORMED

RESPONDENT:

Nancy Ross

MUR: 3969

This matter was generated by information obtained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities pursuant to the Federal Election Campaign Act of 1971, as amended ("the Act"). 2 U.S.C. § 437g(a)(2). The information is based on contributions made to the Lenora B. Fulani for President Committee ("the Committee").

The Act states that no person may make contributions to any candidate and his or her authorized political committees with respect to any election for Federal office which, in the aggregate, exceed \$1,000. 2 U.S.C. § 441a(a)(1)(A).

The payment by an individual from his or her personal funds for the costs incurred in providing goods or services to, or obtaining goods or services that are used by or on behalf of a political committee is a contribution. 11 C.F.R. § 116.5(b). However, two exemptions exist. First, an individual may spend an aggregate of \$1,000 per election for personal transportation expenses on behalf of a candidate without such expenditures counted as contributions. 11 C.F.R. §§ 100.7(b)(8) and 116.5(b). Second, if an individual (who is not a volunteer) incurs expenses for his personal transportation expenses or for his usual and normal subsistence expenses, while traveling on behalf of a candidate or committee, the expenses will not be considered contributions to the committee as long as the committee reimburses the individual. 11 C.F.R. § 116.5(b); see also, Explanation and Justification for 11 C.F.R. § 116.5(b), 55 Fed. Reg.

26382-83 (June 27, 1989). However, the Committee must reimburse the individual within 60 days after the closing date of the billing statement on which the charge first appears if the individual uses a credit card. If a credit card is not used the Committee must make the reimbursement within 30 days after the date on which the expenses were incurred. *Id.* When an individual incurs expenses for the subsistence of others, a contribution occurs at the time the financial obligation is incurred, regardless of when the payment is due or when the individual pays the debt. *Id.*

From June 1, 1991 to September 5, 1992, Nancy Ross made expenditures for transportation and other miscellaneous costs.¹ Since these expenditures were for herself and for the subsistence of others, these expenditures resulted in contributions to the Committee. 11 C.F.R. § 116.5(b). Because Ms. Ross paid for her own travel and subsistence costs with her personal credit card or by means other than her personal credit card, and because she was not reimbursed for these costs within 30 or 60 days, she made contributions to the Committee. *Id.* By making expenditures for the subsistence of others, Ms. Ross made contributions to the Committee at the time she incurred such expenditures. The above-stated expenditures ranged

Express Company account for *The Rainbow Lobby*. *The Rainbow Lobby*, as an entity, did not have an American Express Company account for *The Rainbow Lobby*. *The Rainbow Lobby*, as an entity, did not have an American Express account. However, pursuant to information that was provided by American Express in response to a Commission subpoena in the audit process, it was determined that Nancy Ross was the basic cardholder for an American Express account that was encoded with the words *"The Rainbow Lobby."* Therefore, *The Rainbow Lobby* account was actually the personal account of Nancy Ross. In addition to Nancy Ross, the following individuals were authorized users of this account: Christopher Barclay, Amy Freeman, Kate Gardner, Ada Ivonne Vazquez, Todd Bentsen, Deborah Green, Bonnie Gildin, Shelly Karliner, and Jeffrey Aron. Because Nancy Ross is the basic cardholder for this account, these individuals were not responsible for the payment of any charges that they made to this account. However, since the Rainbow Lobby account was the personal account of Nancy Ross, the Commission believes that it is appropriate to attribute all charges to Nancy Ross. *Cf.* 11 C.F.R. § 9035.2(a)(2) (any expenditures incurred using a credit card for which a publicly-financed candidate is personally liable may be artributable to the candidate's personal expenditure limitation).

from \$10.55 to \$6,409.77. On May 30, 1992, Ms. Ross' excessive amount reached its highest at \$ 19,455.23. Id.

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Therefore, there is reason to believe that Nancy Ross violated 2 U.S.C.

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§ 441a(a)(1)(A) by knowingly making contributions in excess of the contribution limitations.

On May 24 more use in red 2118 C \$43 (mail (A) accorded by coll to accord to a fill

Please be attended that a contribution limits for at 2 U S ("advances" for the straingure d a that are used by you that h R & ma



FEDERAL ELECTION COMMISSION WASHINGTON, D.C. 20463

June 7, 1996

Ms. Margaret Tanzosh 285 Avenue C New York, NY 10009

Re:

MUR 3969 Margaret Tanzosh

Dear Ms. Tanzosh:

On May 24, 1996, the Federal Election Commission found reason to believe that you violated 2 U.S.C. § 441a(a)(1)(A), a provision of the Federal Election Campaign Act of 1971, as amended, by making excessive contributions to the Lenora B. Fulani for President Committee. However, after considering the circumstances of this matter, the Commission also determined to take no further action and closed the file as it pertains to you. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Please be advised that your total amount of contributions to the Committee violated the contribution limitation at 2 U.S.C. § 441a(a)(1)(A). The Commission reminds you that "advances" for the costs incurred in providing goods or services to, or obtaining goods or services that are used by or on behalf of, a candidate or a political committee are considered contributions. See 11 C.F.R. § 116.5(b). You should take steps to ensure that you abide by the contribution limitation and this regulation in the future.

The file will be made public within 30 days after this matter has been closed with respect to all other respondents involved. You are advised that the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) still apply with respect to all respondents still involved in this matter.

If you have any questions, please contact Andre G. Pineda, the attorney assigned to this matter, at (202) 219-3690 or (800) 424-9530.

Sincerely. End Ellest Lee Ann Elliott

Chairman

Enclosure Factual and Legal Analysis

Celebrating the Commission's 20th Anniversan

YESTERDAY, TODAY AND TOMORROW DEDICATED TO KEEPING THE PUBLIC INFORMED

RESPONDENT:

Margaret E. Tanzosh

MUR: 3969

This matter was generated by information obtained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities pursuant to the Federal Election Campaign Act of 1971, as amended ("the Act"). 2 U.S.C. § 437g(a)(2). The information is based on contributions made to the Lenora B. Fulani for President Committee ("the Committee").

The Act states that no person may make contributions to any candidate and his or her authorized political committees with respect to any election for Federal office which, in the aggregate, exceed \$1,000. 2 U.S.C. § 441a(a)(1)(A).

The payment by an individual from his or her personal funds for the costs incurred in providing goods or services to, or obtaining goods or services that are used by or on behalf of a political committee is a contribution. 11 C.F.R. § 116.5(b). However, two exemptions exist. First, an individual may spend an aggregate of \$1,000 per election for personal transportation expenses on behalf of a candidate without such expenditures counted as contributions. 11 C.F.R. § 100.7(b)(8) and 116.5(b). Second, if an individual (who is not a volunteer) incurs expenses for his personal transportation expenses or for his usual and normal subsistence expenses, while traveling on behalf of a candidate or committee, the expenses will not be considered contributions to the committee as long as the committee reimburses the individual. 11 C.F.R. § 116.5(b); *see also, Explanation and Justification for 11 C.F.R. § 116.5(b), 55 Fed. Reg.*

26382-83 (June 27, 1989). However, the Committee must reimburse the individual within 60 days after the closing date of the billing statement on which the charge first appears if the individual uses a credit card. If a credit card is not used the Committee must make the reimbursement within 30 days after the date on which the expenses were incurred. *Id.* When an individual incurs expenses for the subsistence of others, a contribution occurs at the time the financial obligation is incurred, regardless of when the payment is due or when the individual pays the debt. *Id.*

From February 12, 1992 to October 13, 1992, Margaret E. Tanzosh made expenditures for transportation and the subsistence of others. Since these expenditures were for herself and for the subsistence of others, these expenditures resulted in contributions to the Committee. 11 C.F.R. § 116.5(b). Because Ms. Tanzosh paid for her own travel and subsistence costs with her personal credit card or by means other than her personal credit card, and because she was not reimbursed for these costs within 30 or 60 days, she made contributions to the Committee. *Id*. By making expenditures for the subsistence of others, Ms. Tanzosh made contributions to the Committee at the time she incurred such expenditures. The above-stated expenditures ranged from \$.46 to \$1,732.98. On September 15, 1992, Ms. Tanzosh's excessive amount reached its highest at \$8,933.27. *Id*.

Therefore, there is reason to believe that Margaret E. Tanzosh violated 2 U.S.C. § 441a(a)(1)(A) by knowingly making contributions in excess of the contribution limitations.



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Mr. John B. Opdyke 4313 Larchwood Philadelphia, PA 19104 June 7, 1996

Re: MUR 3969 John B. Opdyke

Dear Mr. Opdyke:

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On May 24, 1996, the Federal Election Commission found reason to believe that you violated 2 U.S.C. § 441a(a)(1)(A), a provision of the Federal Election Campaign Act of 1971, as amended, by making excessive contributions to the Lenora B. Fulani for President Committee. However, after considering the circumstances of this matter, the Commission also determined to take no further action and closed the file as it pertains to you. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Please be advised that your total amount of contributions to the Committee violated the contribution limitation at 2 U.S.C. § 441a(a)(1)(A). The Commission reminds you that "advances" for the costs incurred in providing goods or services to, or obtaining goods or services that are used by or on behalf of, a candidate or a political committee are considered contributions. See 11 C.F.R. § 116.5(b). You should take steps to ensure that you abide by the contribution limitation and this regulation in the future.

The file will be made public within 30 days after this matter has been closed with respect to all other respondents involved. You are advised that the confidentiality provisions of 2 U.S.C. \S 437g(a)(12)(A) still apply with respect to all respondents still involved in this matter.

If you have any questions, please contact Andre G. Pineda, the attorney assigned to this matter, at (202) 219-3690 or (800) 424-9530.

Sincerely,

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Lee Ann Elliott Chairman

Enclosure Factual and Legal Analysis

Celebrating the Commission's 20th Anniversary

YESTERDAY, TODAY AND TOMORROW DEDICATED TO KEEPING THE PUBLIC INFORMED

RESPONDENT:

John B. Opdyke

MUR: 3969

This matter was generated by information obtained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities pursuant to the Federal Election Campaign Act of 1971, as amended ("the Act"). 2 U.S.C. § 437g(a)(2). The information is based on contributions made to the Lenora B. Fulani for President Committee ("the Committee").

The Act states that no person may make contributions to any candidate and his or her authorized political committees with respect to any election for Federal office which, in the aggregate, exceed \$1,000. 2 U.S.C. § 441a(a)(1)(A).

The payment by an individual from his or her personal funds for the costs incurred in providing goods or services to, or obtaining goods or services that are used by or on behalf of a political committee is a contribution. 11 C.F.R. § 116.5(b). However, two exemptions exist. First, an individual may spend an aggregate of \$1,000 per election for personal transportation expenses on behalf of a candidate without such expenditures counted as contributions. 11 C.F.R. §§ 100.7(b)(8) and 116.5(b). Second, if an individual (who is not a volunteer) incurs expenses for his personal transportation expenses or for his usual and normal subsistence expenses, while traveling on behalf of a candidate or committee, the expenses will not be considered contributions to the committee as long as the committee reimburses the individual. 11 C.F.R. § 116.5(b); see also, Explanation and Justification for 11 C.F.R. § 116.5(b), 55 Fed. Reg. 26382-83 (June 27, 1989). However, the Committee must reimburse the individual within 60 days after the closing date of the billing statement on which the charge first appears if the individual uses a credit card. If a credit card is not used the Committee must make the reimbursement within 30 days after the date on which the expenses were incurred. *Id.* When an individual incurs expenses for the subsistence of others, a contribution occurs at the time the financial obligation is incurred, regardless of when the payment is due or when the individual pays the debt. *Id.*

From September 17, 1991 to August 10, 1992, John B. Opdyke made expenditures for transportation and the subsistence of others. These expenditures resulted in contributions to the Committee. 11 C.F.R. § 116.5(b). By making these expenditures, Mr. Opdyke made contributions to the Committee at the time he incurred such expenditures. The expenditures ranged from \$12.50 to \$4,457.50. On March 17, 1992, Mr. Opdyke's excessive amount reached its highest at \$8,340.14.

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Therefore, there is reason to believe that John B. Opdyke violated 2 U.S.C.

§ 441a(a)(1)(A) by knowingly making contributions in excess of the contribution limitations.



FEDERAL ELECTION COMMISSION WASHINGTON, D.C. 20463

Mr. Robert Levy 250 W. 57th Street New York, NY 10019 June 7, 1996

Re: MUR 3969 Robert Levy

Dear Mr. Levy:

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NO

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On May 24, 1996, the Federal Election Commission found reason to believe that you violated 2 U.S.C. § 441a(a)(1)(A), a provision of the Federal Election Campaign Act of 1971, as amended, by making excessive contributions to the Lenora B. Fulani for President Committee. However, after considering the circumstances of this matter, the Commission also determined to take no further action and closed the file as it pertains to you. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Please be advised that your total amount of contributions to the Committee violated the contribution limitation at 2 U.S.C. § 441a(a)(1)(A). The Commission reminds you that "advances" for the costs incurred in providing goods or services to, or obtaining goods or services that are used by or on behalf of, a candidate or a political committee are considered contributions. See 11 C.F.R. § 116.5(b). You should take steps to ensure that you abide by the contribution limitation and this regulation in the future.

The file will be made public within 30 days after this matter has been closed with respect to all other respondents involved. You are advised that the confidentiality provisions of 2 U.S.C. \S 437g(a)(12)(A) still apply with respect to all respondents still involved in this matter.

If you have any questions, please contact Andre G. Pineda, the attorney assigned to this matter, at (202) 219-3690 or (800) 424-9530.

Sincerely,

e and Ellestt

Lee Ann Elliott Chairman

Enclosure Factual and Legal Analysis

Celebrating the Commission's 20th Anniversary

YESTERDAY, TODAY AND TOMORROW DEDICATED TO KEEPING THE PUBLIC INFORMED

RESPONDENT:

Robert Levy

MUR: 3969

This matter was generated by information obtained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities pursuant to the Federal Election Campaign Act of 1971, as amended ("the Act"). 2 U.S.C. § 437g(a)(2). The information is based on contributions made to the Lenora B. Fulani for President Committee ("the Committee").

The Act states that no person may make contributions to any candidate and his or her authorized political committees with respect to any election for Federal office which, in the aggregate, exceed \$1,000. 2 U.S.C. § 441a(a)(1)(A).

The payment by an individual from his or her personal funds for the costs incurred in providing goods or services to, or obtaining goods or services that are used by or on behalf of a political committee is a contribution. 11 C.F.R. § 116.5(b). However, two exemptions exist. First, an individual may spend an aggregate of \$1,000 per election for personal transportation expenses on behalf of a candidate without such expenditures counted as contributions. 11 C.F.R. §§ 100.7(b)(8) and 116.5(b). Second, if an individual (who is not a volunteer) incurs expenses for his personal transportation expenses or for his usual and normal subsistence expenses, while traveling on behalf of a candidate or committee, the expenses will not be considered contributions to the committee as long as the committee reimburses the individual. 11 C.F.R. § 116.5(b); see also, Explanation and Justification for 11 C.F.R. § 116.5(b), 55 Fed. Reg.

26382-83 (June 27, 1989). However, the Committee must reimburse the individual within 60 days after the closing date of the billing statement on which the charge first appears if the individual uses a credit card. If a credit card is not used the Committee must make the reimbursement within 30 days after the date on which the expenses were incurred. *Id.* When an individual incurs expenses for the subsistence of others, a contribution occurs at the time the financial obligation is incurred, regardless of when the payment is due or when the individual pays the debt. *Id.*

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On April 2, 1992, Robert Levy made an expenditure for transportation and the subsistence of others. This expenditure resulted in a contribution to the Committee. 11 C.F.R. § 116.5(b). By making this expenditure, Mr. Levy made a contribution to the Committee at the time he incurred such expenditure. The above-stated expenditure was \$1,384.78. On April 2, 1992, Mr. Levy's excessive amount reached its highest at \$636.78. Therefore, there is reason to believe that Robert Levy violated 2 U.S.C.

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§ 441a(a)(1)(A) by knowingly making a contribution in excess of the contribution limitations.



FEDERAL ELECTION COMMISSION WASHINGTON, D.C. 20463 June 7, 1996

Mr. David Belmont 5 W. 107th Street #5B New York, NY 10025

Re:

MUR 3969 David Belmont

Dear Mr. Belmont:

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On May 24, 1996, the Federal Election Commission found reason to believe that you violated 2 U.S.C. § 441a(a)(1)(A), a provision of the Federal Election Campaign Act of 1971, as amended, by making excessive contributions to the Lenora B. Fulani for President Committee. However, after considering the circumstances of this matter, the Commission also determined to take no further action and closed the file as it pertains to you. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Please be advised that your total amount of condributions to the Committee violated the contribution limitation at 2 U.S.C. § 441a(a)(1)(A). The Commission reminds you that "advances" for the costs incurred in providing goods or services to, or obtaining goods or services that are used by or on behalf of, a candidate or a political committee are considered contributions. See 11 C.F.R. § 116.5(b). You should take steps to ensure that you abide by the contribution limitation and this regulation in the future.

The file will be made public within 30 days after this matter has been closed with respect to all other respondents involved. You are advised that the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) still apply with respect to all respondents still involved in this matter.

If you have any questions, please contact Andre G. Pineda, the attorney assigned to this matter, at (202) 219-3690 or (800) 424-9530.

Sincerely, and Ellest ee Ann Elliott

Chairman

Enclosure Factual and Legal Analysis

Celebrating the Commission's 20th Anniversary

YESTERDAY, TODAY AND TOMORROW DEDICATED TO KEEPING THE PUBLIC INFORMEC*

FEDERAL ELECTION COMMISSION FACTUAL AND LEGAL ANALYSIS

RESPONDENT:

David Belmont

MUR: 3969

This matter was generated by information obtained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities pursuant to the Federal Election Campaign Act of 1971, as amended ("the Act"). 2 U.S.C. § 437g(a)(2). The information is based on contributions made to the Lenora B. Fulani for President Committee ("the Committee").

The Act states that no person may make contributions to any candidate and his or her authorized political committees with respect to any election for Federal office which, in the aggregate, exceed \$1,000. 2 U.S.C. § 441a(a)(1)(A).

The payment by an individual from his or her personal funds for the costs incurred in providing goods or services to, or obtaining goods or services that are used by or on behalf of a political committee is a contribution. 11 C.F.R. § 116.5(b). However, two exemptions exist. First, an individual may spend an aggregate of \$1,000 per election for personal transportation expenses on behalf of a candidate without such expenditures counted as contributions. 11 C.F.R. §§ 100.7(b)(8) and 116.5(b). Second, if an individual (who is not a volunteer) incurs expenses for his personal transportation expenses or for his usual and normal subsistence expenses, while traveling on behalf of a candidate or committee, the expenses will not be considered contributions to the coramittee as long as the committee reimburses the individual. 11 C.F.R. § 116.5(b); see also, Explanation and Justification for 11 C.F.R. § 116.5(b), 55 Fed. Reg. 26382-83 (June 27, 1989). However, the Committee must reimburse the individual within 60 days after the closing date of the billing statement on which the charge first appears if the individual uses a credit card. If a credit card is not used the Committee must make the reimbursement within 30 days after the date on which the expenses were incurred. *Id.* When an individual incurs expenses for the subsistence of others, a contribution occurs at the time the financial obligation is incurred, regardless of when the payment is due or when the individual pays the debt. *Id.*

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From June 26, 1991 to September 7, 1992, Mr. Belmont made expenditures for transportation, office supplies and other miscellaneous costs. Since these expenditures were for himself and for the subsistence of others, these expenditures resulted in contributions to the Committee. 11 C.F.R. § 116.5(b). Because Mr. Belmont paid for his own travel and subsistence costs with his personal credit card or by means other than his personal credit card, and because he was not reimbursed for these costs within 30 or 60 days, he made contributions to the Committee. *Id.* By making expenditures for the subsistence of others, Mr. Belmont made contributions to the Committee at the time he incurred such expenditures. The above-stated expenditures ranged from \$1.59 to \$3,827. On May 18, 1992, Mr. Belmont's excessive amount reached its highest at \$ 25,500.48. *Id.*

Therefore, there is reason to believe that David Belmont violated 2 U.S.C. § 441a(a)(1)(A) by knowingly making contributions in excess of the contribution limitations.

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FEDERAL ELECTION COMMISSION

June 7, 1996

Ms. Jini L. Berman 210 W. 101st Street New York, NY 10025-5059

Re:

MUR 3969 Jini L. Berman

Dear Ms. Berman:

On May 24, 1996, the Federal Election Commission found reason to believe that you violated 2 U.S.C. § 441a(a)(1)(A), a provision of the Federal Election Campaign Act of 1971, as amended, by making excessive contributions to the Lenora B. Fulani for President Committee. However, after considering the circumstances of this matter, the Commission also determined to take no further action and closed the file as it pertains to you. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Please be advised that your total amount of contributions to the Committee violated the contribution limitation at 2 U.S.C. § 441a(a)(1)(A). The Commission reminds you that "advances" for the costs incurred in providing goods or services to, or obtaining goods or services that are used by or on behalf of, a candidate or a political committee are considered contributions. See 11 C.F.R. § 116.5(b). You should take steps to ensure that you abide by the contribution limitation and this regulation in the future.

The file will be made public within 30 days after this matter has been closed with respect to all other respondents involved. You are advised that the confidentiality provisions of 2 U.S.C. $\S 437g(a)(12)(A)$ still apply with respect to all respondents still involved in this matter.

If you have any questions, please contact Andre G. Pineda, the attorney assigned to this matter, at (202) 219-3690 or (800) 424-9530.

Sincerely,

Inn Ellest

Lee Ann Elliott Chairman

Enclosure Factual and Legal Analysis

Celebrating the Commission's 20th Anniversary

YESTERDAY, TODAY AND TOMORROW DEDICATED TO KEEPING THE PUBLIC INFORMED

FEDERAL ELECTION COMMISSION FACTUAL AND LEGAL ANALYSIS

RESPONDENT:

Jini L. Berman

MUR: 3969

This matter was generated by information obtained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities pursuant to the Federal Election Campaign Act of 1971, as amended ("the Act"). 2 U.S.C. § 437g(a)(2). The information is based on contributions made to the Lenora B. Fulani for President Committee ("the Committee").

The Act states that no person may make contributions to any candidate and his or her authorized political committees with respect to any election for Federal office which, in the aggregate, exceed \$1,000. 2 U.S.C. § 441a(a)(1)(A).

The payment by an individual from his or her personal funds for the costs incurred in providing goods or services to, or obtaining goods or services that are used by or on behalf of a political committee is a contribution. 11 C.F.R. § 116.5(b). However, two exemptions exist. First, an individual may spend an aggregate of \$1,000 per election for personal transportation expenses on behalf of a candidate without such expenditures counted as contributions. 11 C.F.R. § 100.7(b)(8) and 116.5(b). Second, if an individual (who is not a volunteer) incurs expenses for his personal transportation expenses or for his usual and normal subsistence expenses, while traveling on behalf of a candidate or committee, the expenses will not be considered contributions to the committee as long as the committee reimburses the individual. 11 C.F.R. § 116.5(b); see also, Explanation and Justification for 11 C.F.R. § 116.5(b), 55 Fed. Reg.

26382-83 (June 27, 1989). However, the Committee must reimburse the individual within 60 days after the closing date of the billing statement on which the charge first appears if the individual uses a credit card. If a credit card is not used the Committee must make the reimbursement within 30 days after the date on which the expenses were incurred. *Id.* When an individual incurs expenses for the subsistence of others, a contribution occurs at the time the financial obligation is incurred, regardless of when the payment is due or when the individual pays the debt. *Id.*

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From June 17, 1991 to August 25, 1992, Ms. Berman made expenditures for transportation and other miscellaneous costs. Since these expenditures were for herself and for the subsistence of others, these expenditures resulted in contributions to the Committee. 11 C.F.R. § 116.5(b). Because Ms. Berman paid for her own travel and subsistence costs with her personal credit card or by means other than her personal credit card, and because she was not reimbursed for these costs within 30 or 60 days, she made contributions to the Committee. *Id.* By making expenditures for the subsistence of others, Ms. Berman made contributions to the Committee at the time she incurred such expenditures. The above-stated expenditures ranged from \$11.50 to \$898.78. On February 22, 1992, Ms. Berman's excessive amount reached its highest at \$ 1,452.81. *Id.*

Therefore, there is reason to believe that Jini L. Berman violated 2 U.S.C. § 441a(a)(1)(A) by knowingly making contributions in excess of the contribution limitations.



FEDERAL ELECTION COMMISSION WASHINGTON, D.C. 20463

June 17, 1996

Ms. Margaret E. Golden 251 Pierce Street San Francisco, CA 94117-3308

Re:

MUR 3969 Margaret E. Golden

Dear Ms. Golden:

On May 24, 1996, the Federal Election Commission found reason to believe that you violated 2 U.S.C. § 441a(a)(1)(A), a provision of the Federal Election Campaign Act of 1971, as amended, by making excessive contributions to the Lenora B. Fulani for President Committee. However, after considering the circumstances of this matter, the Commission also determined to take no further action and closed the file as it pertains to you. The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Please be advised that your total amount of contributions to the Committee violated the contribution limitation at 2 U.S.C. § 441a(a)(1)(A). The Commission reminds you that "advances" for the costs incurred in providing goods or services to, or obtaining goods or services that are used by or on behalf of, a candidate or a political committee are considered contributions. See 11 C.F.R. § 116.5(b). You should take steps to ensure that you abide by the contribution limitation and this regulation in the future.

The file will be made public within 30 days after this matter has been closed with respect to all other respondents involved. You are advised that the confidentiality provisions of 2 U.S.C. \S 437g(a)(12)(A) still apply with respect to all respondents still involved in this matter.

If you have any questions, please contact Andre G. Pineda, the attorney assigned to this matter, at (202) 219-3690 or (800) 424-9530.

Sincerely,

Ellest

Lee Ann Elliott Chairman

Enclosure Factual and Legal Analysis

Celebrating the Commission's 20th Anniversary

YESTERDAY, TODAY AND TOMORROW DEDICATED TO KEEPING THE PUBLIC INFORMED

FEDERAL ELECTION COMMISSION FACTUAL AND LEGAL ANALYSIS

RESPONDENT:

Margaret E. Golden

MUR: 3969

This matter was generated by information obtained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities pursuant to the Federal Election Campaign Act of 1971, as amended ("the Act"). 2 U.S.C. § 437g(a)(2). The information is based on contributions made to the Lenora B. Fulani for President Committee ("the Committee").

The Act states that no person may make contributions to any candidate and his or her authorized political committees with respect to any election for Federal office which, in the aggregate, exceed \$1,000. 2 U.S.C. § 441a(a)(1)(A).

The payment by an individual from his or her personal funds for the costs incurred in providing goods or services to, or obtaining goods or services that are used by or on behalf of a political committee is a contribution. 11 C.F.R. § 116.5(b). However, two exemptions exist. First, an individual may spend an aggregate of \$1,000 per election for personal transportation expenses on behalf of a candidate without such expenditures counted as contributions. 11 C.F.R. § 100.7(b)(8) and 116.5(b). Second, if an individual (who is not a volunteer) incurs expenses for his personal transportation expenses or for his usual and normal subsistence expenses, while traveling on behalf of a candidate or committee, the expenses will not be considered contributions to the committee as long as the committee reimburses the individual. 11 C.F.R. § 116.5(b); see also, Explanation and Justification for 11 C.F.R. § 116.5(b), 55 Fed. Reg.

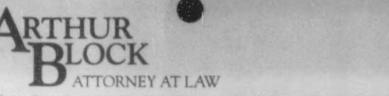
26382-83 (June 27, 1989). However, the Committee must reimburse the individual within 60 days after the closing date of the billing statement on which the charge first appears if the individual uses a credit card. If a credit card is not used the Committee must make the reimbursement within 30 days after the date on which the expenses were incurred. *Id.* When an individual incurs expenses for the subsistence of others, a contribution occurs at the time the financial obligation is incurred, regardless of when the payment is due or when the individual pays the debt. *Id.*

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From April 4, 1992 to October 22, 1992, Ms. Golden made expenditures for transportation, office supplies and other miscellaneous costs. Since these expenditures were for herself and for the subsistence of others, these expenditures resulted in contributions to the Committee. 11 C.F.R. § 116.5(b). Because Ms. Golden paid for her own travel and subsistence costs with her personal credit card or by means other than her personal credit card, and because she was not reimbursed for these costs within 30 or 60 days, she made contributions to the Committee. *1d.* By making expenditures for the subsistence of others, Ms. Golden made contributions to the Committee at the time she incurred such expenditures. The above-stated expenditures ranged from \$1.30 to \$1,600. On March 6, 1992, Ms. Golden's excessive amount reached its highest at \$838.70. *1d.*

Therefore, there is reason to believe that Margaret E. Golden violated 2 U.S.C. § 441a(a)(1)(A) by knowingly making contributions in excess of the contribution limitations.

1000



72 Spring Steet, Suite 1201, New York, NY 10012 (212) 966-0404 Fax (212) 431-3516

June 19, 1996

VIA FACSIMILE (202) 219-3923 AND FCM

Andre G. Pineda, Esq. Office of General Counsel Federal Election Commission 999 E Street N.W. Washington, DC 20463

> Re: MUR 3969 Lenora B. Fulani for President Francine Miller, as Treasurer

Dear Mr. Pineda:

Today I called you in response to the letter dated June 7, 1996 giving notice of MUR 3969 and I requested the following information:

On what date was MUR 3969 opened? The number sequence suggests this MUR was opened in or about 1994.

2. There are several MUR's that have been fully processed and made public regarding allegations of excessive contributions involving use of credit cards in the 1992 election cycle. How did it happen that only at this late date the Commission is giving notice of this similar MUR to my client?

3. How is the opening up of this MUR, and the prosecution of this MUR in June 1996, permitted by 11 CFR 9038.1(e)(2)? The credit card "matters" were "contained" in the publicly-released audit report in April 1994. Therefore, there would seem to be no basis for opening up or prosecuting a confidential enforcement proceeding two years later. Even if the Commission has acted in this way in other cases, it does not mean that the practice is permitted by the regulation.

4. The MUR notification package contains a proposed conciliation agreement. I believe my client is entitled, nearly four years after the conclusion of her primary campaign, to be informed by the Commission whether there are any other agency-initiated MURs that have been



Andre G. Pineda, Esq. June 19, 1996 Page 2

opened regarding her 1992 campaign, and whether there are any other agency-initiated MURs that are being contemplated. At this late date, a precondition for the Commission to negotiate in good faith with my client in a conciliation context is for the Commission to disclose whether there any other enforcement matters against my client of which she has not been given notice.

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Very truly yours,

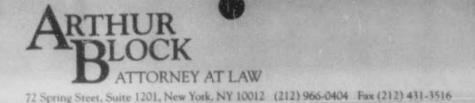
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Arthur R. Block

ARB/bp

cc: Lenora B. Fulani, Ph.D. Francine Miller, Esq.

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June 21, 1996

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VIA FACSIMILE (202) 219-3923 AND FEDERAL EXPRESS

Andre G. Pineda, Esq. Office of General Counsel Federal Election Commission 999 E Street N.W. Washington, DC 20463

> Re: MUR 3969 Lenora B. Fulani for President Francine Miller, as Treasurer

Dear Mr. Pineda:

I represent the respondents in the above-referenced MUR. Enclosed is an executed designation of counsel form. This is a request for an extension of time of no fewer than 20 days to submit a response.

The notification letter dated June 7, 1996 was received on June 12, 1996. The initial due date is June 27, 1996. Hence, this request is for a due date of on or after July 17, 1996. The grounds for the request include, but are not limited to, the following.

First, responding to the factual allegations requires investigation, review, and analysis of financial transactions that are four or more years old, and that involve 14 credit card accounts and numerous individuals.

Second, my client had every reason to consider the matter of the alleged excessive contributions through the use of credit cards to be resolved by the Final Audit Report adopted in April 1994. Aside from the passage of over two years since the adoption of the report, pursuant to 11 C.F.R. sec. 9038.1(e)(2), if the Commission had wanted to pursue this matter in an enforcement proceeding, then the publicly released report should not have contained a discussion of these allegations, but rather, should have "indicate[d] that certain other matters have been referred to the Commission's Office of General Counsel." In fact, the report discussed these allegations in detail. Without prejudice to the Committee's position that the prosecution of this



Andre G. Pineda, Esq. June 21, 1996 Page 2

MUR is not permitted by the regulation¹, it is clearly the case that if the Commission needed over two years from its adoption of the Final Audit Report to produce its Factual and Legal Basis document, then it is unfair and unreasonable to expect the Committee to produce a response to that document in two weeks.

Third, in addition to the factual issues, there are important legal issues implicated by this MUR that need to be researched and developed. Respondent Miller and her counsel have other professional commitments which require that additional time be granted in order to be able to schedule work on this unexpected matter.

Very truly yours,

V.e.

Arthur R. Block

ARB/bp

cc: Lenora B. Fulani, Ph.D. Francine Miller, Esq.

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¹ Also, prosecution of the MUR should be barred by laches. Not only is the MUR based on a two year old audit report, the docket number of the MUR indicates that the MUR itself was opened approximately two years ago. It is prejudicial, unconscionable, and against statutory intent and public policy to belatedly impose the burden of defending this MUR and the possibility of a substantial financial penalty on my client at this time. If this alleged violation could be prosecuted by the FEC at all, it should have been commenced long ago.

JUN-20-1996 12:41 FROM SPRING ST LAW OFFICES

STATEMENT OF DESIGNATION OF COUNSEL

TO

3969		
NAME OF COUNSEL:	Arthur R. Block, Esq.	*
ADDRESS:	72 Spring Street, Suite 1201	PEDE OFFICE
	New York, NY 10012	Sound Strate
TELEPBONE:	(212) 966-0404	AN SS

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.

RESPONDENT'S NAME: ADDRESS:

Signature

P.82

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Lenora B. Fulani for President Francine Miller, as Treasurer

Lenora B. Fulani for President Francine Miller, as Treasurer

50 West 77th Street #10J

New York, NY 10024

HOME PHONE:

BUSINESS PEONE:

(212) 969-3742

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FEDERAL ELECTION COMMISSION WASHINGTON, D.C. 20463

June 26, 1996

VIA FACSIMILE AND FIRST CLASS MAIL

Arthur Block, Esq. 72 Spring Street Suite 1201 New York, NY 10012

Re:

MUR 3969 Lenora B. Fulani for President Francine Miller, as Treasurer

Dear Mr. Block:

This is in response to your letter, via facsimile, on behalf of Lenora B. Fulani for President ("the Committee") and Francine Miller, as Treasurer, dated June 21, 1996. As stated within your letter, you are requesting an extension of time "of no fewer than 20 days to submit a response" to the Federal Election Commission reason to believe finding in connection with MUR 3969. After considering the circumstances presented in your letter, as well as the substance of our June 26, 1996 phone conversation, the Office of the General Counsel has granted the Committee and Ms. Miller a 20-day extension of time. Accordingly, a response by the Committee and Ms. Miller is due by the close of business on July 17, 1996.

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

Sinterely.

Andre G. Pineda Attorney

Celebrating the Commission's 20th Anniversary

YESTERDAY, TODAY AND TOMORROW DEDICATED TO KEEPING THE PUBLIC INFORMED 72 Spring Steet, Suize 1201, New York, NY 10012 (212) 966-0404 Fax (212) 431-3516

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P.01

TO

JUL 9 2 17 PM "96

FACSIMILE

July 9, 1996

To: Andre G. Pineda, Esq.

Fax: 202-219-3923

From: Arthur R. Block, Esq.

Notes:

Original sent via mail? yes

pages (including cover sheet) 3

THIS FACSIMILE TRANSMISSION CONTAINS CONFIDENTIAL AND/OR LEGALLY PRIVILEGED INFORMATION INTENDED ONLY FOR THE USE OF THE INDIVIDUAL(S) NAMED ON THE TRANS-MISSION SHEET. IF YOU ARE NOT THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISCLOSURE, COPYING, DISTRIBUTION OR THE TAKING OF ANY ACTION IN RELIANCE ON THE CONTENTS OF THIS FACSIMILE TRANSMISSION IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS TRANSMISSION IN ERROR, PLEASE NOTIFY US BY TELEPHONE IMMEDIATELY SO THAT WE CAN ARRANGE FOR RETURN OF THE DOCUMENTS TO US AT NO COST TO YOU.



ATTORNEY AT LAW 72 Spring Steet, Suite 1201, New York, NY 10012 (212) 966-0404 Fax (212) 431-3516

July 9, 1996

VIA FACSIMILE (202) 219-3923 AND FCM

Andre G. Pineda, Esq. Office of General Counsel Federal Election Commission 999 E Street N.W. Washington, DC 20463

> Rc: MUR 3969 Lenora B. Fulani for President Francine Miller, as Treasurer

Dear Mr. Pineda:

This will confirm the information requests that I conveyed to you orally during the conference call on Wednesday, July 3, 1996, in which you, Francine Miller, and I participated. The main points were as follows.

First, the Interim Audit Report determined that there were excessive contributions resulting from the use of credit cards to purchase campaign-related goods and services in the amount of \$86,562. This calculation was based on records kept by the Committee in its accounts payable files, and which were available to the field auditors. However, the Final Audit Report added \$20,510 to the alleged excessive contribution amount based upon credit card records obtained outside of the Committee's files. The Committee disputes that credit card charges that were not reflected by documentation in the Committee's files were campaign related. However, it is impossible for the Committee to attempt to rebut the Commission's classification of \$20,510 of charges as campaign related without being informed as to what those charges were. Hence, my first request was for the Commission to identify the alleged campaign related charges that were the basis for the additional \$20,510.

Second, what are the criteria used by the Audit Staff to distinguish between advances made for his/her own travel and subsistence (Code 5) and advances made other than for his or her own travel or subsistence (Code 4)

Third, the Committee, on legal grounds, will challenge the denial of a 60 day period to pay any and all campaign related credit card charges before the charges are deemed



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Andre G. Pineda, Esq. July 9, 1996 Page 2

contributions. We are asking the Commission to do a computer analysis with this data to calculate what excessive contributions, if any, would still be shown by the Commission's analysis if a 60 day period was applied to all of the credit card charges.

Thank you for your cooperation and assistance.

Very truly yours,

TO

Dloch

12022193923-5555

P.03

Arthur R. Block

ARB/bp cc: Francine Miller, Esq.



TO

FACSIMILE

July 11, 1996

To: Andre Pineda, Esq.

Fax: (202) 219-3923

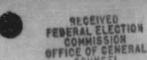
From: Arthur R. Block, Esq.

Notes:

Original sent via mail? yes

pages (including cover sheet) 3

THIS FACSIMILE TRANSMISSION CONTAINS CONFIDENTIAL AND/OR LEGALLY PRIVILEGED INFORMATION INTENDED ONLY FOR THE USE OF THE INDIVIDUAL(S) NAMED ON THE TRANS-MISSION SHEET. IF YOU ARE NOT THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISCLOSURE, COPVENG, DISTRIBUTION OR THE TAKING OF ANY ACTION IN RELIANCE ON THE CONTENTS OF THIS FACSIMILE TRANSMISSION IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS TRANSMISSION IN ERROR, PLEASE NOTIFY US BY TELEPHONE IMMEDIATELY SO THAT WE CAN ARRANGE FOR RETURN OF THE DOCUMENTS TO US AT NO COST TO YOU.



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72 Spring Steet, Suite 1201, New York, NY 10012 (212) 966-0404 Fax (212) 431-3516

RNEY AT LAW

July 11, 1996

TO

VIA FACSIMILE (202) 219-3923 AND FCM

Andre G. Pineda, Esq. Office of General Counsel Federal Election Commission 999 E Street N.W. Washington, DC 20463

> Re: MUR 3969 Lenora B. Fulani for President Francine Miller, as Treasurer

Dear Mr. Pineda:

Yesterday there was a conference call among you, Rick Halter, Francine Miller and me, to discuss the informational queries that were previously raised in our July 3rd discussion as confirmed in my letter to you of July 12, 1996. Mr. Halter said that he would be able to provide the Committee with some of the materials it has requested, and that he expected to send the materials on Monday by overnight delivery to be received on July 16, 1996.

As we discussed, the current due date for the Committee's response is July 17, 1996. The Committee will submit a response within the current time frame, if necessary, but it will be impossible for such a response to reflect an analysis and response to the materials that the Audit Division will be sending us. Indeed, these materials -- which will, inter alia, identify charges on various person's credit card bills that the Commission deemed to be campaign related -- will necessitate consultations with third parties in order to evaluate the transactions, and third party affidavits might be needed as well. Hence I anticipate that after evaluating the materials, the Committee would seek to supplement its response.

I think your office may agree that it is most efficient from everyone's point of view to extend the time to submit the response, so that there should be no need to supplement it after the original filing. If your office would agree to the desirability of an extension of time, then I would request that it be granted to Monday, August 5, 1996, because I will be on vacation the week of



Andre G. Pineda, Esq. July 11, 1996 Page 2

week of July 22, 1996, and anticipate that I will be extremely pressed with other work in addition to completing this response the week that I return.

Please let me know what is the view of the Office of General Counsel on how to proceed. Thank you.

Very truly yours,

TO

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Arthur R. Block

ARB/bp cc: Francine Miller, Esq.

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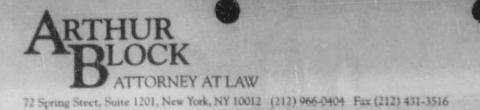
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July 9, 1996

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VIA FACSIMILE (202) 219-3923 AND FCM

Andre G. Pineda, Esq. Office of General Counsel Federal Election Commission 999 E Street N.W. Washington, DC 20463

> Re: MUR 3969 Lenora B. Fulani for President Francine Miller, as Treasurer

Dear Mr. Pineda:

This will confirm the information requests that I conveyed to you orally during the conference call on Wednesday, July 3, 1996, in which you, Francine Miller, and I participated. The main points were as follows.

First, the Interim Audit Report determined that there were excessive contributions resulting from the use of credit cards to purchase campaign-related goods and services in the amount of \$86,562. This calculation was based on records kept by the Committee in its accounts payable files, and which were available to the field auditors. However, the Final Audit Report added \$20,510 to the alleged excessive contribution amount based upon credit card records obtained outside of the Committee's files. The Committee disputes that credit card charges that were not reflected by documentation in the Committee's files were campaign related. However, it is impossible for the Committee to attempt to rebut the Commission's classification of \$20,510 of charges as campaign related without being informed as to what those charges were. Hence, my first request was for the Commission to identify the alleged campaign related charges that were the basis for the additional \$20,510.

Second, what are the criteria used by the Audit Staff to distinguish between advances made for his/her own travel and subsistence (Code 5) and advances made <u>other than</u> for his or her own travel or subsistence (Code 4)

Third, the Committee, on legal grounds, will challenge the denial of a 60 day period to pay any and all campaign related credit card charges before the charges are deemed





Andre G. Pineda, Esq. July 9, 1996 Page 2

contributions. We are asking the Commission to do a computer analysis with this data to calculate what excessive contributions, if any, would still be shown by the Commission's analysis if a 60 day period was applied to all of the credit card charges.

Thank you for your cooperation and assistance.

Very truly yours,

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Arthur R. Block

ARB/bp cc: Francine Miller, Esq.

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FEDERAL ELECTION COMMISSION WASHINGTON, D.C. 20463

July 16, 1996

VIA FACSIMILE AND FEDERAL EXPRESS

Arthur Block, Esq. 72 Spring Street Suite 1201 New York, NY 10012

Re:

MUR 3969 Lenora B. Fulani for President Francine Miller, as Treasurer

Dear Mr. Block:

This letter is to confirm our phone conversations of July 11, 1996 and July 15, 1996, as well as to respond to your letters dated July 9, 1996 and July 11, 1996.

As we discussed during our July 11, 1996 conference call, and as requested in your July 9th letter, Rick Halter has prepared copies of the credit card statements pertaining to Lenora B. Fulani for President ("the Committee") expenditures totaling \$20,510. As you know, the Commission found that these expenses were campaign related. See Final Audit Report of Lenora B. Fulani for President dated April 24, 1994. Copies of these statements are enclosed.

The Office of the General Counsel also has reviewed your July 11th letter requesting additional time to respond to the above-stated matter based upon your need to review the enclosed materials. Specifically, this letter requests that the Committee be permitted to submit a response to the Office of the General Counsel on August 5, 1996. After considering the circumstances presented in your letter, the Office of the General Counsel has granted the Committee and Ms. Miller a 16 day extension of time. Accordingly, a response by the Committee and Ms. Miller is due by the close of business on August 2, 1996.

> Celebrating the Commission's 20th Anniversary YESTERDAY, TODAY AND TOMORROW DEDICATED TO KEEPING THE PUBLIC INFORMED

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Celebrating the Commission's 20th Anniversary

YESTERDAY, TODAY AND TOMORROW DEDICATED TO KEEPING THE PUBLIC INFORMED

July 16, 1996 Page -2-

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

Singerely Andre G. Pineda Attorney

Enclosure



July 11, 1996

VIA FACSIMILE (202) 219-3923 AND FCM

Andre G. Pineda, Esq. Office of General Counsel Federal Election Commission 999 E Street N.W. Washington, DC 20463

Re:

MUR 3969 Lenora B. Fulani for President Francine Miller, as Treasurer

Dear Mr. Pineda:

PEDERAL ELECTION OFFICE OF CENERAL DIFFICE OF CENERAL DISELEMENT

Yesterday there was a conference call among you, Rick Halter, Francine Miller and me, to discuss the informational queries that were previously raised in our July 3rd discussion as confirmed in my letter to you of July 12, 1996. Mr. Halter said that he would be able to provide the Committee with some of the materials it has requested, and that he expected to send the materials on Monday by overnight delivery to be received on July 16, 1996.

As we discussed, the current due date for the Committee's response is July 17, 1996. The Committee will submit a response within the current time frame, if necessary, but it will be impossible for such a response to reflect an analysis and response to the materials that the Audit Division will be sending us. Indeed, these materials -- which wili, inter alia, identify charges on various person's credit card bills that the Commission deemed to be campaign related -- will necessitate consultations with third parties in order to evaluate the transactions, and third party affidavits might be needed as well. Hence I anticipate that after evaluating the materials, the Committee would seek to supplement its response.

I think your office may agree that it is most efficient from everyone's point of view to extend the time to submit the response, so that there should be no need to supplement it after the original filing. If your office would agree to the desirability of an extension of time, then I would request that it be granted to Monday, August 5, 1996, because I will be on vacation the week of



Andre G. Pineda, Esq. July 11, 1996 Page 2

week of July 22, 1996, and anticipate that I will be extremely pressed with other work in addition to completing this response the week that I return.

Please let me know what is the view of the Office of General Counsel on how to proceed. Thank you.

Very truly yours,

- Bloch

Arthur R. Block

ARB/bp cc: Francine Miller, Esq. ARTHUR BLOCK DATTORNEY AT LAW 72 Spring Steet, Suite 1201, New York, NY 10012 (212) 966-0404 Fax (212) 431-3516

AUG-12-15-56 17126 THUM SHATHS ST LAW DEFICES

FACSIMILE

PROPERTY AND A DESCRIPTION OF A DESCRIPT

ШA

August 2, 1996

To: Andre Pineda, Esq.

Fax: 202-219-1043

From: Arthur R. Block, Esq.

Notes:

Last two pages of brief included

Original sent via Federal Express? yes

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72 Spring Steer, Suite 1201, New York. NY 10012 (212) 966-0404 Fax (212) 431-3516

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August 2, 1996

VIA FACSIMILE (202) 219-1043 AND FEDERAL EXPRESS

STAINS SI LIN UFFILES

Andre G. Pineda, Esq. Office of General Counsel Federal Election Commission 999 E Street N.W. Washington, DC 20463

> Re: MUR 3969 Lenora B. Fulani for President Francine Miller, as Treasurer

Dear Mr. Pineda:

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I am transmitting herewith the response of respondents Lenora B. Fulani for President Committee and Francine Miller, as Treasurer, to the Commission's reason to believe determination in MUR 3969. The papers include:

- 1. Declaration of Francine Miller, with exhibits
- 2. Declaration of Nancy Ross, with exhibits
- 3. Brief.

Pursuant to our discussion earlier this week, the respondents are satisfying today's filing deadline by sending the complete documentation to the Office of General Counsel by Federal Express for Monday delivery, and by sending to you by facsimile a copy of this letter along with copies of the first and last pages of each declaration and of the brief.

Thank you for your cooperation in this matter, and for the cooperation of Mr. Halter and Mr. Favin in the Audit Division in responding to technical questions from myself and Ms. Miller.

Very truly yours,

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Arthur R. Block

ARB/op encs. cc: Francine Miller, Esq. Lenora B. Fulani, Ph.D.

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Lenora B. Fulani for President Committee and Francine Miller, as Treasurer

MUR 3969

DECLARATION OF FRANCINE MILLER

I, FRANCINE MILLER, make the following declaration under penalty of perjury:

 I am the Treasurer of Lenora B. Fulani for President (the "Committee"), respondent herein, and make this affidavit in response to FEC-initiated MUR #3969.

2. During the 1992 election cycle, I was unaware of the requirements of 11 C.F.R. 116.5(b). (When I assisted the Treasurer of Dr. Fulani's campaign in 1988, this regulation was not in effect.) I first learned of the content of the regulation when I was presented with the Audit Division's analysis at the audit exit conference in March, 1993.

3. In the spring of 1991 I applied for an American Express corporate card on behalf of the Committee. The application was denied. Having access to a credit card was critical for a multitude of necessary transactions, so individuals volunteered the use of their credit cards to provide such access. The following descriptions of such use demonstrates the ways staff and volunteers necessarily used their credit cards to charge expenses on behalf of the Committee. portion of the charges assumed by the Audit Staff to <u>not</u> be for the cardholders' own travel were <u>for</u> the cardholders' own travel – either individuals cannot now remember, or documentary proof, such as rental car agreements, no longer exist.

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Pursuant to 29 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief. Executed August 1, 1996.

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BEFORE THE FEDERAL ELECTION COMMISSION

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In the Matter of

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Lenora B. Fulani for President Committee and Francine Miller, as Treasurer

MUR 3969

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DECLARATION OF NANCY ROSS

I, NANCY ROSS, make the following declaration under penalty of perjury:

 During the 1992 presidential campaign, I was the Chief Lobbyist for the Rainbow Lobby, Inc. (the "Lobby"), a not-for-profit, 501(c)(4) membership and lobbying organization. I make this declaration in support of the response of Lenora B. Fulani for President (the "Committee"), and Francine Miller, as Treasurer, to MUR #3969, opened by the Federal Election Commission ("FEC" or "Commission") regarding staff advances under 11 C.F.R. 116.5(b). I have personal knowledge of the facts stated herein.

2. The Rainbow Lobby was founded in 1986, and became a nationwide membership organization of over 200,000 citizens. It was a non-partisan, grassroots citizens lobby that supported legislation promoting election reform and human rights internationally. The Lobby performed many activities, including publishing a quarterly newsletter, initiating and Pursuant to 28 U.S.C. \$1746, I declare under penalty of perjury that the foregoing

is true and correct to the best of my knowledge and belief. Executed July 31, 1996.

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BEFORF THE FEDERAL ELECTION COMMISSION

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In the Matter of

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Lenora B. Fulani	
for President Committee	
and Francine Miller, as	
Treasurer	

MUR 3969

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TO

RESPONSE OF LENORA B. FULANI FOR PRESIDENT COMMITTEE AND FRANCINE MILLER, AS TREASURER, TO REASON TO BELIEVE DETERMINATION

PRELIMINARY STATEMENT

Respondents Lenora B. Fulani for President Committee (the "Committee") and Francine Miller, as Treasurer, (hereinafter collectively referred to as "respondents") respectfully submit this response to the Commission's reason to believe determination in MUR 3969, and to the Factual and Legal Analysis which formed a basis for the Commission's finding. Accompanying the instant brief and incorporated herein by reference are the declarations of Francine Miller ("Miller Dec.") and Nancy Ross ("Ross Dec."), and the exhibits annexed thereto.

For the reasons set forth in Point I below, the Commission should vacate the reason to believe determination and vacate the MUR for lack of jurisdiction. In the alternative, for the reasons stated in Point II below, the Commission should find that there is no probable cause to believe that a violation of 2 U.S.C. § 441a(f) occurred. Assuming <u>arguendo</u> that a probable cause finding were to be made, then the Commission should take no further action against the respondent, consistent with the proper ordering of the Commission's priorities and resources, and consistent with its decisions in other enforcement matters, <u>see</u> Point III.

Finally, to put it into a broader perspective, one fails to see how the Commission can fairly prioritize the instant alleged violations for use of its limited enforcement resources when the Commission has failed to prioritize and pursue audit repayment or enforcement in cases involving vastly more money and much clearer culpability. Most striking is its failure to pursue against the 1992 Clinton Committee the staff findings that the Clinton Committee engaged in an egregious, unlawful manipulation of its finances that netted it approximately \$2 million in excess government funds. The Commission failed to take action either in the audit process or in response to complaint-initiated MUR 4192 to recover the \$2 million from the Clinton Committee for the Treasury.

CONCLUSION

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For all of the aforestated reasons, the reason to believe determination should be vacated and this proceeding terminated. In the alternative, the Commission should made a tinding that the Committee did not make any excessive contributions through staff advances. In the further alternative, if there are any excessive contributions, the Commission should assess no penalty and take no further action.

Dated: New York, N.Y. August 2, 1996

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Respectfully Submitted,

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ARTHUR R. BLOCK Attorney at Law Attorney for Respondents 72 Spring Street, Suite 1201 New York, NY 10012 (212) 966-0404

On the Brief:

Arthur R. Block, Esq. Michael R. Bressler, Esq.

The assistance of law student Edward Taibi is gratefully acknowledged. ATTORNEY AT LAW . 72 Spring Steet, Suite 1201, New York, NY 10012 (212) 966-0404 Fax (212) 431-3516

BULK FILE

August 2, 1996

VIA FACSIMILE (202) 219-1043 AND FEDERAL EXPRESS

Andre G. Pineda, Esq. Office of General Counsel Federal Election Commission 999 E Street N.W. Washington, DC 20463

> Re: MUR 3969 Lenora B. Fulani for President Francine Miller, as Treasurer

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Very truly yours,

Roli

Arthur R. Block

ARB/bp encs. cc: Francine Miller, Esq. Lenora B. Fulani, Ph.D.

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Lenora B. Fulani for President Committee and Francine Miller, as Treasurer

MUR 3969

RESPONSE OF LENORA B. FULANI FOR PRESIDENT COMMITTEE AND FRANCINE MILLER, AS TREASURER, TO REASON TO BELIEVE DETERMINATION

ARTHUR R. BLOCK 72 Spring Street Suite 1201 New York, NY 10012 (212) 966-0404

August 2, 1996

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Lenora B. Fulani)
for President Committee)
and Francine Miller, as)
Treasurer)

MUR 3969

RESPONSE OF LENORA B. FULANI FOR PRESIDENT COMMITTEE AND FRANCINE MILLER, AS TREASURER, TO REASON TO BELIEVE DETERMINATION

PRELIMINARY STATEMENT

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STATEMENT OF FACTS

Credit cards are no longer a significant source of credit for most of their users. They are simply payment devices -- money at a distance. As a practical matter, it has become difficult to buy an airplane ticket or rent a car without a credit card.

J. Gleick, "Cash is Dying," <u>The New York Times Magazine</u>, June 16, 1996, p. 26, at p. 42.

Consistent with the above-quoted observation, it is virtually impossible for a candidate to conduct a national presidential campaign in the United States without using credit cards as a medium of purchase for essential goods and services. This indispensable function of credit cards is separable from the availability of credit card accounts to be sources of interest bearing loans for funds used to purchase goods and services.

The 1992 presidential campaign of Lenora B. Fulani was a grassroots operation from top to bottom. It was fueled by small contributions from approximately 100,000 Americans. The Committee had insufficient financial backing to qualify for a corporate credit card. The Treasurer applied for an American Express card for the Committee and the application was denied. Dr. Fulani, the candidate, did not have a personal credit card. There were high level operations people in her staff who did not have personal credit cards. At the rank and file level, many petitioners, canvassers, and other campaign workers did not have personal credit cards. Many of these workers and volunteers moved from state to state conducting ballot access petitioning drives accompanied by fundraising drives. Hence, significant travel and subsistence expenses were incurred by many rank and file workers and volunteers. Miller Dec.

The campaign did not have a set-piece national infrastructure of local and state level campaign offices. When campaign workers and volunteers needed to purchase supplies or services, they could not drop into a local campaign office and get a cash advance. In order to function at all, they had to be able to purchase supplies, make photocopies, pay for printing fliers, pay for postage and courier services, make telephone calls, etc. and then get reimbursed through regional coordinators or directly from the national office in New York City. Miller Dec. The Commission, has, thus far, treated all of these purchases of goods and services as "contributions." For example, the payment by Margaret Golden, a campaign staff member, of a telephone bill containing campaign-related calls was treated by the Commission as a "contribution" even though Ms. Golden submitted the portion of the bill containing the campaign calls for reimbursement and was promptly reimbursed by the Committee. Miller Dec., Ex. E The Commission has interpreted 11 C.F.R. § 116.5 to mean that every payment by an individual for goods or services on behalf of the campaign is a "contribution," even if reimbursed in a timely fashion. The only transactions exempt from this designation are those in which an individual incurs expenses for his or her own travel or subsistence.

The transactions that form the basis for the Commission's allegation of excessive "contributions" to the Fulani campaign are far removed from the kind of "contribution" that the Act was intended to regulate. These are not injections of wealth into a campaign giving it a competitive advantage over other candidates. The transactions listed by the Audit Division's analysis are a multitude of routine day-to-day business transactions that were carried out by or for the benefit of the campaign and reimbursed within a normal window period for payments of invoices to commercial vendors. To characterize these transactions as "contributions" turns the intent and spirit of the Federal Election Campaign Act ("the Act") upside down. 11 C.F.R. § 116.5(b) was intended to further the statutory purpose of preventing candidates backed by

wealthy supporters from gaining undue advantage in the electoral arena; yet it is being used to punish a decidedly un-wealthy candidate with un-wealthy supporters for merely finding reasonable ways to cope with the practicalities of carrying out business transactions in the modern business environment.

There is no corrupting influence of wealth in this case, nor even the appearance of it. To the contrary, the Commission's application of 116.5(b) to this case thus far is creating a new obstacle for fair participation in the electoral process by grass roots campaigns whose campaign committee and many of its campaign workers lack lines of credit from credit card companies and lending institutions. Furthermore, the Commission has adopted a definition of transactions exempt from the strictures of the regulation that is tailor-made for the characteristics of a campaign of an established candidate. An established candidate and most, if not all, of the staff and volunteers who travel on campaign business will have personal credit cards; they are able to purchase air plane tickets, hotel rooms, food, and rental cars on their own credit cards and qualify for the FEC created exemption. The candidate, his or her committee, and his or her fundraising chairs, are likely to have sufficient creditworthiness or contacts at financial institutions to obtain lines of credit or credit cards, and to open accounts with Federal Express, with travel agencies and other necessary commercial vendors.

The typical establishment campaign has regional, state and local campaign officials in different parts of the country who are able to draw checks on committee accounts to pay vendors at the time of purchase or give petty cash advances to campaign workers. The Commission's Explanation and Justification of 11 C.F.R. §116.5(b), 55 Fed. Reg. 26382 (June 27, 1989) states that the exemption was created because the agency wanted to accommodate

campaigns -- if the Committee did not want to give corporate cards to campaign workers and volunteers, the individuals could use their own cards and the transaction would not be deemed a "contribution" as long as it is paid within the time frames set forth by the regulation.¹ This exemption, however, ignores the facts of a non-establishment campaign in which neither the committee, the candidate, nor many campaign workers have credit cards nor access to normal business credit, and which does not have campaign offices throughout the nation where expense checks can be written directly on committee accounts and from which petty cash can be disbursed. If the Fulani Committee had the same <u>safe harbor of 60 days</u> in which to reimburse the expenses listed in the Audit Division analysis as is extended by the regulation to the "exempt" transactions, then the excessive contribution finding against the Fulani Committee would virtually disappear, as explained below.

If the Committee had been aware of the regulation, it could have made some adjustments to mitigate the immediate impact of the restrictions. But the adjustments would have been costly in lost resources, efficiency and flexibility. Full compliance would have imposed a significant loss of operational ability. The Committee would have been put at a comparative disadvantage to the candidates who were able to (i) obtain committee corporate credit cards, thereby obviating the need for individuals to use their cards, and (ii) make good use

¹ The regulation provides that if a Committee is reimbursing an individual for a payment for his or her own travel or subsistence, if originally paid by cash or check, the Committee must reimburse the amount within thirty days; if originally paid by credit card, the Committee must reimburse the expense within sixty days of the closing date on the credit card statement.

of the exemptions set forth in the regulation, since many of their campaign workers had their own credit cards.

The Nature of the Staff Advance Transactions

The reason to believe determination is based upon "staff advances" made by or on the account of 14 individuals.² We will now fill out in more detail the general description above of the campaign's practices regarding staff advances and credit cards, by reviewing the role each of these individuals played.

Opdycke and Fain

John B. Opdycke made his credit card available to the Committee for a certain period of time. Eleanor Fain authorized additional cardholders on her American Express account, including Francine Miller, Lenora B. Fulani and Cathy Stewart. The Committee used these cards to remedy some of the practical problems created by the Committee's inability to obtain its own credit card or credit accounts with vendors.

For example, Federal Express would not accept cash for its services and would not open a Committee account. Federal Express was a vital service for the campaign's operations. Federal Express required the Committee to charge shipments to a credit card and thus, charges to the Opdycke credit card were functionally equivalent to charging shipments directly to a Federal Express account. Opdycke's credit card billing statements consist of long

The analysis in the Interim Audit Report was based upon expenses incurred by these individuals that were documented in the Committee's files as campaign related. In the Final Audit Report the Commission added approximately \$20,000 in expenses the Committee contends were <u>not</u> campaign-related to totals for several individuals. <u>See infra</u>. Hence, the description in this section of the Response applies only to the expenses that the Committee says are campaign related.

lists of Federal Express charges (see Miller Dec., Ex. A). These charges were generally paid by the Committee within 60 days from the closing statement of the credit card. Yet, the Commission deems these Federal Express charges to be "contributions" because they were not charges for the travel and subsistence of Opdycke. If the Committee had a Federal Express account, there would have been no need for this use of the Opdycke card and there would have been no such "contributions." Similarly, if this use of a credit card had the benefit of the same 60 grace period the Commission has accorded other charges, there would be no excessive "contributions." The Commission has attributed \$8,340.14 in "excessive contributions" to Mr. Opdycke.

Ms. Fain's American Express account generally was used to perform transactions that would be difficult or impossible for the Committee to carry out without a credit card, such as booking airline and hotel reservations. The credit card statements were generally paid within 60 days. Hence, if the grace period was applied to these routine business transactions there would be no excessive "contributions." In addition, even though Dr. Fulani used the credit card she obtained through Ms. Fain's authorization to charge her own travel, since according to American Express, Ms. Fain was ultimately responsible for payment on the account, such charges were attributed by the Commission to Ms. Fain. The Commission attributed \$22,367.92 in "excessive contributions" to Ms. Fain.

David Relmont

David Belmont was the Committee's Ballot Access Coordinator. He ran the operation that got Dr. Fulani on the general election ballot in approximately 39 states and the District of Columbia, and which attempted to gain ballot access in several other states as well. As began to be widely publicized in 1992 in the mass media because of the Perot petitioning drives, the kind of operation that Belmont ran is highly pressured, fast paced, labor intensive, and involves numerous logistical and other expenses. This was especially the case with the Fulani campaign, because the campaign could not rely on local petitioners to manage the drives. Rather, many of its petitioning drives around the nation were led by campaign staff who were deployed from state to state. There were considerable costs for airfare, car rentals, and subsistence, as well as a multitude of other out of pocket expenses. The campaign did not have a credit card or business accounts with vendors to make most of these purchases, and many people in the field did not have personal credit cards.

Belmont had a personal American Express card, and used it to charge many expenses incurred in connection with his operation. In addition, Belmont incurred expenses for which he paid cash or check. The Committee generally paid American Express directly, and reimbursed Belmont for his out-of-pocket expenses within a commercially reasonable time, usually within 60 days of the credit card statement closing date, if the charge was paid by credit card, and within 30 days if the expense was paid by check or cash. However, because payments or charges made for the travel or subsistence of <u>others</u> are not exempt under Commission rules and because some of the expenses incurred by Belmont were for goods, the charges were deemed contributions from the date they were incurred. The Commission attributed \$25,500.48 in "excessive contributions" to Mr. Belmont.

Nancy Ross

Nancy Ross was the account holder for a credit card account on which there were also several other authorized card holders. When a cardholder other than Ross used the card for campaign travel or subsistence, the Commission would <u>not</u> categorize the expense as exempt, because the cardholder was not the account holder. The Committee questions this classification practice.

In any event the <u>campaign-related</u> charges on the Ross account were ordinary expenses such as transportation, lodging and rental of meeting rooms, and they were reimbursed by the Committee in a normal commercial period. In the Interim Audit Report, the Audit Staff's analysis resulted in a finding of \$6,711.52 of excessive contributions by Ms. Ross.³ If the 60day safe harbor were applied to this set of transactions, there would be little or no excessive contribution amount on the Ross card.

Margaret Tanzosh, Marsha Plafkin, Margaret Golden, James and Lauren Ross

Margaret Tanzosh, Marsha Plafkin, Margaret Golden and Lauren Ross were field organizers for the campaign. They were responsible for running operations in different regions of the country. They made various expenditures on behalf of the campaign by cash or check or credit card, including for their own personal travel and subsistence, as well as for others' travel and subsistence. They made expenditures for goods needed to run their operations such as

³ Subsequently the Audit Staff determined that an additional \$16,139.66 in charges were campaign-related, which resulted in a finding increasing the excessive contributions from \$6,711.52 to \$19,455.23 in the MUR. See Ross Dec. for a detailed description of the charges and their actual, non-campaign related purposes.

folding tables or flyers for fundraising. Their teams did a lot of traveling, predominantly for fundraising, as is reflected in the large proportion of credit card charges for car rentals.

If the Committee could have obtained credit cards or opened accounts with car rental companies and other vendors, then the above-described transactions could have been accomplished directly by the Committee. Because this was not possible, Tanzosh, Plafkin and Golden used personal credit cards to charge the car rentals and make the necessary purchases. In most cases, such charges were paid by the Committee directly to the credit card company in a commercially reasonable time. In other instances, the individuals were reimbursed by the campaign in a timely fashion.

Lauren Ross did not have a credit card of which she was the account holder. However, her father, James Ross, authorized her use of his credit card. It was never intended that James Ross advance payments to the credit card company for any of these campaign related expenses. This intent was carried out. All the charges incurred for the campaign on Ms. Ross' credit card were paid directly to the credit card company by the Committee. Hence, James Ross was, in practice, a guarantor of his daughter's use of the credit card on campaign business. Upon information and belief, in applying the exemption for personal travel and subsistence, the Audit Division did not scrutinize each of the thousands of credit cards used by campaign workers in federal elections in the 1992 election cycle in order to determine which credit card accounts had guarantors. Upon information and belief the Audit Division did not disallow the exemption with regard to every charge for personal travel and subsistence made by a campaign worker whose credit card was guaranteed by a parent or other third party. Accordingly, the "James Ross"

charges should be deemed to be "Lauren Ross" charges and the exemption granted for Ms. Ross's travel and subsistence.

In summary, the credit card charges and other advances made by these four field organizers did not infuse wealth into campaign coffers, but merely made it possible for transactions to be concluded in the normal course of business which were paid for by the Committee in a commercially reasonable time. In most instances, the Committee paid the charges directly, so that the individuals never spent any money.

Cathy Stewart and Jini Berman

Cathy Stewart was a top level operations person, and Jini Berman was Dr. Fulani's personal secretary and aide. Both of them were limited in their ability to transact necessary business because neither Ms. Stewart nor Dr. Fulani had a credit card, and the campaign had neither a credit card account nor credit with various vendors. Berman had a personal credit card, which was used from time to time to charge campaign related expenses, which were generally reimbursed by the Committee in a commercially reasonable time frame.

The alleged excessive contributions attributed to Ms. Stewart are based on her having set up the Committee's New Hampshire primary campaign. Between November and December 1991, Ms. Stewart spent a significant amount of money to set up the Committee's operation, all of which was either advanced to her or reimbursed within the thirty day grace period.

Lawrence Grigsby and Fred Newman

Frederick Newman was Dr. Fulani's campaign manager. Cathy Salit, the Campaign Operations Coordinator, was an authorized cardholder on Dr. Newman's account, and

charged some of the expenses she incurred while in New Hampshire for the campaign's primary operation. The Commission attributed these charges to Dr. Newman, and since they were not for his own travel, deemed them "contributions." If the sixty day safe harbor exemption for personal travel applied to these charges, there would be no excessive contributions charged. <u>See</u> Miller Dec., Ex. I.

Similarly, Lawrence Grigsby rented a car for campaign staff in Los Angeles, because no one on staff at that time had a credit card. The Commission deemed this to be a "contribution," since the charge was not for Mr. Grigsby's own travel. Again, if the sixty day safe harbor rule applied, there would be no "excessive contributions" attributable to Mr. Grigsby. See Miller Dec., Ex. D.

Robert Levy and Jeannine Hahn

Robert Levy was a campaign staff member who charged the use of a mobile phone on his credit card, and was reimbursed within sixty days by the Committee. Since this expense was not for his personal travel or subsistence, the Commission deemed it to be a "contribution," resulting in a finding of \$636.78 in excessive contributions. <u>See</u> Miller Dec., Ex. K. Finally, Jeannine Hahn was a volunteer who rented a car on behalf of the Committee for the Committee's use during the New Hampshire primary operation. Since the Audit Staff determined this expense was not for her own travel or subsistence, it was deemed a "contribution" and resulted in a finding in the MUR of \$2,343.44 of "excessive contributions" by Ms. Hahn.

S20,510 in "Excessive Contributions" Are Erroneously Derived From Transactions Unrelated to the Committee

Subsequent to the interim audit report, the Audit Staff sought and received individuals' credit card statements for periods in which the individuals had not charged any campaign-related expenses. Such statements were not in the Committee's files, since those individuals had not charged any expenses on behalf of the Committee during the periods in question.

Upon receipt of those statements, the Audit Staff added \$20,510 in "excessive contributions" to their original finding in the interim audit report. They did so because they assumed that "since certain expenses relative to travel, subsistence and related expenses were incurred during the time periods for which these cards had been made available for the Committee's use," then those expenses were campaign related. (See Report of the Audit Division on Lenora B. Fulani for President in the Final Audit Report, p. 8-9.)

The Committee contends this is an erroneous assumption. The Ross Declaration submitted herewith demonstrates in detail the fallacy of this assumption; Nancy Ross and the authorized cardholders on her account charged expenses for their lobbying efforts on behalf of the Rainbow Lobby, not the Committee. Those expenses were substantially similar in terms of type of expense; they tended to be for transportation, lodging and office-related goods. They were not, however, incurred on behalf of the Committee.

The Ross Declaration and exhibits demonstrates that the Audit Division incorrectly attributed to the Committee charges on her credit card totaling \$16,139.66. This

further corroborates the reliability of the records kept by the Committee Treasurer. If a credit card charge was not in the Committee's accounts payables files, it was not <u>Committee related</u>.⁴

The Ross account represents most the add-ons by the auditors after the Interim Audit Report. But for the two year delay in notifying the respondents of this MUR, detailed refutation of the other add-ons may have been available for a response.⁵ But the instant response is more than sufficient to show that the auditors' assumption is not validly applied here and all of the post-Initial Audit Report add-ons of expenses should be deleted from the calculation of alleged excessive contributions.⁶

⁴ The Audit Staff's assumption was based on the erroneous premise that the Committee <u>controlled</u> the individuals' credit cards in question. As the Committee asserted in response to the Audit Staff's initial request for such statements, that was not the case, except in a few limited circumstances, as described above. The Committee used and controlled Eleanor Fain's and J. B. Opdycke's cards. Other than those, however, individuals controlled their own credit cards, and charged their own personal expenses on such cards. Individuals could have traveled, stayed in hotels, and purchased goods during the campaign period <u>not</u> on behalf of the Committee. In fact, if the Committee had paid those charges, they would have been deemed non-qualified campaign expenses.

⁵ It is difficult for the Committee to document that the balance of the additional charges the Audit Staff assumed were campaign-related were not so. The Committee is severely prejudiced by the length of time between the majority of the transactions at issue and the Commission's finding that the Committee violated FECA.

⁶ Furthermore, the Audit Staff did not apply 11 C.F.R. § 100(b)(8) -- which allows an individual to spend up to \$1,000 of his or her own money, without being reimbursed, on travel or subsistence expenses on behalf of the campaign -- to the expenses they assumed were campaign-related.

ARGUMENT

POINT I: THE COMMISSION IS BARRED FROM PROSECUTING THIS PROCEEDING AT THIS TIME BY THE EXPLICIT LANGUAGE OF 11 C.F.R. § 9038(e)(2), AND, ADDITIONALLY, BY UNREASONABLE AND PREJUDICIAL AGENCY DELAY

A. Because The Instant Allegations Were Contained In The Publicly-Released Audit Report They May Not Be The Subject Of An Enforcement Proceeding Under 2 U.S.C. § 437g And 11 C.F.R. Part 111

The Commission's own regulations specifically provide that the agency must

decide before issuing a publicly-released audit report of a committee that received presidential primary matching funds, whether or not the agency will reserve any matters raised by the audit for possible enforcement action under 2 U.S.C. § 437g and 11 C.F.R. Part 111. If the Commission <u>does</u> want to reserve the possibility of enforcement action on any matter, then the publicly released report <u>may not contain such matter</u>. 11 C.F.R. § 9038.1(e)(2) expressly prescribes:

If the Commission determines, on the basis of information obtained under the audit and examination process, that certain matters warrant enforcement under 2 U.S.C. 437g and 11 CFR Part 111, those matters <u>will</u> <u>not be contained in the publicly-released report</u>. In such cases, the audit report will indicate that certain other matters have been referred to the Commission's Office of General Counsel.

(emphasis supplied)

The regulation ensures that the committee will be on notice no later than the adoption of the final audit report of where it stands relative to possible enforcement action arising out of the audit report. This is consistent with Congressional intent that the Commission act expeditiously, and do what it can to avoid having audits and enforcement proceedings involving presidential campaigns carry over into the next presidential election cycle. <u>Cf.</u> 26

U.S.C. § 9038(c) (three year statute of limitations for Commission to notify candidate of repayment determination). The regulation also ensures that the confidentiality of possible enforcement proceedings will be preserved as required by 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A). Congress mandated that enforcement proceedings be confidential.

The Commission's actions in this case violated the letter, the purpose, and the spirit of this regulation. In April 1994, the Commission released to the public an audit report that discussed in detail the allegations that are the basis for this MUR -- confidentiality of the enforcement proceeding was breached by the agency from its inception. Furthermore, the audit report did <u>not</u> state that certain matters had been referred to Office of General Counsel. There was a general statement: "It should be noted that the Commission may pursue further any of the matters discussed in this report in an enforcement action." Final Audit Report, p. 3. But this statement was consistent with the possibility that <u>no</u> matters had been referred to the OGC.

As time passed, this possibility grew to appear to be a likelihood if not a certainty. In 1994, the Commission did not notify the Committee that the alleged excessive staff advances issue had been referred to OGC. Another entire year passed -- in all of 1995, the Commission did not notify the Committee that this matter had been referred to OGC. And then another five months elapsed before notice was given in June 1996, <u>more than two years after the public</u> <u>release of the audit report</u>, and during the final five month stretch of the 1996 presidential election cycle.

Confidentiality was blatantly breached. The "confidential" Factual and Legal Basis document that forms the basis for the reason to believe determination is comprised of information and analysis that the Commission released to the public in the Final Audit Report more than two years before notice of the "confidential" MUR was given to the Committee.

The prosecution of this MUR is a clear violation of 11 C.F.R. § 9038.1(e)(2). The only effective remedy for this violation is to vacate the reason to believe determination and to close this MUR.

B. The Only Effective Remedy For The Commission's Unreasonable And Prejudicial Delay In Notifying Respondents Of Its Prosecution Of This MUR. Is To Vacate The Proceeding

The Office of General Counsel opened MUR 3969 on May 16, 1994, shortly after the Commission's adoption of the Final Audit Report. However, the Commission did not notify the Committee of the MUR until more than two years later, in June 1996. This delay in notification is inexcusable and highly prejudicial.

Other presidential candidates with similar issues were notified much earlier than Fulani of OGC enforcement proceedings. For example, MUR 3947, involving Senator Kerry's 1992 campaign, had a reason to believe determination issued by August 2, 1994, nearly two years earlier than the notice to Fulani. The 1992 Agran Committee was the subject of a MUR on the identical issue as this one. However, the Commission made a reason to believe determination on August 5, 1993. With regard to the 1992 Buchanan Committee, the agency presumably opened MUR 4108 considerably after the instant MUR 3969, but the Commission issued a reason to believe determination for the multifaceted Buchanan proceeding on September 1, 1995, nine months before giving notice to Fulani of her single-issue MUR.

Not only was Fulani deprived of fair notice, and of notice comparable to other similarly situated candidates, but also the Commission engaged in other enforcement actions which would lead Fulani to believe that the staff advances issue was closed. In July 1994, the Commission invoked a rarely (if ever) used regulation to open an unprecedented post-final audit report special audit "inquiry" of the Committee's expenditures. This massive proceeding, which still is not concluded more than two years later, was based upon the allegation that the Fulani campaign was a sham campaign fabricated for the purpose of receiving federal matching fund grants and then diverting the funds out of the campaign to its campaign manager. The Commission has failed to find any evidence to support these allegations. The thrust of the inquiry, therefore, is in completely the opposite direction of the issue raised in the instant MUR. The charge that the Committee received excessive contributions due to staff advances under 116.5 is premised on the existence of a real, operational campaign, and the alleged violation is that resources were improperly being <u>given</u> to the campaign to carry out its operations, as opposed to <u>taken from</u> the campaign.

MUR 3969 was opened two months before the Commission opened its massive, high priority, special audit inquiry. If the Commission had prosecuted the MUR in a normal manner, it would have been in the position of prosecuting simultaneously two proceedings whose theories are inconsistent. Instead, indisputably, the Commission suspended the investigation of the charges in the MUR for nearly two years, without notifying the respondents that the MUR existed. This prejudicial manipulation of its law enforcement docket is arbitrary, capricious and an abuse of discretion.⁷

⁷ The timing of the adoption of the reason to believe determination also creates, at least, an appearance of politicized enforcement. After two years of inactivity, this MUR was activated shortly after Dr. Fulani notified the FEC that she was taking steps to be prepared to participate in the Reform Party presidential nominating contest. Similarly, the opening of the

The agency delay was highly prejudicial. When the Commission gave notice to the Committee in June 1996, the transactions being questioned were already 4-5 years old! There were hundreds of transactions, involving dozens of people. Many of these people had long since lost touch with the Committee. Additional documentation that might rebut some of the allegations became more difficult if not impossible to obtain because of the passage of time. Moreover, although this MUR is based on information culled from the routine field audit conducted in late 1992 and early 1993, just after the 1992 election, the Commission did not even notify the respondents of the MUR until five months before the 1996 election. Congress and the courts have made clear that in the area of federal election law enforcement, time is of the essence. <u>Cf. Simon v. FEC</u>, 53 F.3d 356 (D.C. Cir. 1995), <u>Dukakis v. FEC</u>, 53 F.3d 361 (D.C. Cir. 1995).

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In the instant case, the respondents did not even know that there was an enforcement proceeding open against them so they did not even have the option of asking the District of Columbia Circuit to issue a mandamus order requiring a decision to be issued. Clearly, the only effective remedy for the agency's delay is for the MUR to be vacated forthwith. <u>Cf. Simon and Dukakis, supra</u> (in both cases the court ordered the termination of the entire agency repayment process because of agency delay).

massive audit inquiry coincided with Fulani's challenge to Democratic Party icon Mario Cuomo in the New York State Democratic Primary, and ultimately served the purpose of imposing a major obstacle to Dr. Fulani's possible challenge to President Clinton in the 1996 Democratic Party presidential primary contest.

POINT II: THE ROUTINE COMMERCIAL VENDOR TRANSACTIONS WHICH WERE REIMBURSED BY THE COMMITTEE WITHIN NORMAL BUSINESS PAYMENT PERIODS DID NOT CONSTITUTE "CONTRIBUTIONS" UNDER FECA, OR, IN THE ALTERNATIVE, FECA AS APPLIED TO THESE TRANSACTIONS IS UNCONSTITUTIONAL

The participation of American citizens in the presidential electoral process is one of the most essential First Amendment freedoms. Associating with candidates, working on campaigns as volunteers and staff, and contributing labor and financial resources to campaigns, are protected activities. The government may regulate them only to achieve a compelling state interest, and only when there is no less restrictive alternative to fulfill such an interest.

The Federal Election Campaign Act of 1971 (the "Act" or "FECA") was enacted for the purpose of remedying both the appearance and reality of corruption of the electoral process through the influence of money. Congress sought to level the electoral playing field by restricting the size of contributions, thereby (it was hoped) reducing the costs of competing for election and the disproportionate influence of wealthy institutions and individuals on elections and governance. <u>Buckley v. Valeo</u>, 424 U.S. 1, 14-23 (1976)(<u>Buckley</u>). Both the broad sweep and the intimate details of FECA and its implementing regulations have repeatedly been subjected to searching scrutiny by the federal courts. Most notably, twenty years ago the Supreme Court found certain provisions of the Act to be unconstitutional in <u>Buckley</u>, and a month ago the Supreme Court again invalidated a significant provision of the Act in <u>Colorado</u> <u>Republican Federal Campaign Committee v. FEC</u>, No. 95-489, ____U.S. ____(June 26, 1996)(<u>CRFCC</u>). The Court reiterated that a regulation of expenditures for electoral purposes is forbidden under the compelling state interest test unless there is evidence or legislative findings suggesting "special dangers of corruption . . . that tip the constitutional balance." Id., Slip Op. at 7-8.

In the instant case, the Commission seeks to apply the statutory prohibition on certain kinds of contributions and expenditures set forth in 2 U.S.C. § 441a(f), which provides. in part:

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.

One such "limitation" is that an individual shall contribute no more the 1,000 to any candidate for federal office in a single election cycle. 2 U.S.C. § 441a(a)(1)(A). "Contribution" is defined to include, <u>inter alia</u>, "any gift, subscription, loan, <u>advance</u>, or deposit of money or anything of value " (emphasis supplied). 2 U.S.C. § 431(8)(A)(i). Subsection 431(8)(B)(iv) <u>excludes</u> from the definition of "contribution" up to 1,000 in unreimbursed advances for travel expenses on behalf of a candidate or political committee. Hence, by applying 441a(a)(1)(A) and 431(8)(B)(iv), an individual may, without exceeding any limitation enforced through 441a(f), directly contribute 1,000 to a candidate for federal office and, <u>in addition</u>, advance 1,000 in travel expenses which are not reimbursed.⁸

⁸ Nowhere in the Act is it stated that the \$1,000 exclusion <u>from</u> the definition of "contribution" is to be offset against the \$1,000 limit on transactions that <u>are</u> within the definition of "contribution." (This is not surprising because such an offset would contradict the logical distinction between a <u>exclusion</u> from contributions and a cap on contributions.) Consequently, the Audit Division analysis of staff advances significantly overstated the amount of alleged excessive contributions because it did not take into account at all the \$1,000 exclusion under the subsection. <u>See</u> subpoint D, <u>infra</u>.

Respondents contend that the transactions that are the subject of this MUR are not "contributions" within the meaning of the Act. In the alternative, if FECA does deem these transactions to be "contributions," then the Act is unconstitutional as applied herein.

A. The Instant Transactions Are Not Contributions Under FECA

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Prior to the 1992 election cycle, the Commission did not contend that the kinds of transactions at issue here were "contributions" under the Act. Indeed, the Fulani Committee followed substantially the same practices with regard to reimbursements and staff advances in 1992 as Dr. Fulani's 1988 committee had followed in the previous election cycle. All of the relevant documentation was presented to the field auditors in 1988, just as it was in 1992, without the Commission ever suggesting that these transactions were contributions.

The asserted legal grounds for the Commission to treat these transactions as contributions in 1992 is its newly enacted regulation, 11 CFR § 116.5. However, there is no legal basis in the Act for the enactment of 116.5. The Commission has set forth its legal justification for 116.5 in <u>Explanation and Justification for 11 C.F.R. § 116.5</u>, 55 <u>Fed. Reg.</u> 26,382 (June 27, 1989). The <u>Explanation and Justification</u> cites one provision of the Act as the basis for the new regulation, 2 U.S.C. § 431(8)(B)(iv), the subsection discussed above. This citation is inapposite. The statutory subsection exempts \$1,000 in <u>unreimbursed</u> advances from the definition of "contribution" and "advance." It does <u>not</u> state that payment for campaign related expenses of the type engaged in by the Committee which were <u>reimbursed</u> within normal commercial vendor timeframes are contributions. (And prior to the 1992 election cycle the Commission never claimed that this or any other provision in the statute had such an effect.) In fact, the statute says nothing about reimbursed expenses or about credit card charges that are paid directly by the Committee to a staff member's credit card company within the regular billing cycle.

Furthermore, 116.5 is inconsistent with the purported statutory justification in that the regulation creates an exemption only for <u>personal</u> expenses; but the statutory subsection has no such limitation. The statute refers only to "travel," whereas the regulation exempts travel and subsistence. ⁹

In short, when the Commission promulgated 116.5 it legislated outside the scope of any applicable statutory authority. Accordingly, the Commission has no legal basis to determine that the Committee accepted unlawful excessive contributions in 1992 when it simply followed the same practices that the Commission found to be lawful in 1988. The intervening promulgation of an <u>ultra vires</u> regulation is no basis for the change in law enforcement actions.

B. Section 116.5 Is Unconstitutional Because It Restricts First Amendment Activity And Is Not The Least Restrictive Means To Achieve A Compelling State Interest

The association of candidates for elected office with their supporters is protected by the First Amendment. Both in 1988 and in 1992, several of Dr. Fulani's supporters helped her campaign by letting their credit cards be used to facilitate transactions with commercial vendors in ways that would be difficult without credit cards. Other supporters used cash, checks

⁹ The new regulation also cannot be derived from the statutory subsection because the regulation creates an <u>unlimited</u> exemption for certain staff advances provided that they <u>are</u> reimbursed within certain time frames. There is no \$1,000 limit. Under the statute, a campaign worker can advance \$500.00 in travel expenses and never be repaid, without being credited with a "contribution." Under the regulation, a campaign worker can advance \$5,000.00, \$10,000, \$15,000 -- there is no limit -- for their own travel and subsistence expenses and they are not contributions, as long as they are reimbursed in a timely manner by the candidate.

or credit cards to purchase goods and services on behalf of the Committee. In the instances in which their credit cards were used, the Committee generally paid the credit card company directly. Where supporters made purchases by cash or check, they were reimbursed in a timely fashion. These practices were necessary because of the practical difficulties for the campaign to make those purchases directly (see Miller Dec.) In 1988 the Commission accepted such practices as not being "contributions." In 1992, unless the expense was for the individual's own travel or subsistence, it contends that all these expenses are contributions. There is no compelling governmental interest for this change of position.

The Commission acknowledged in its official justification for promulgating 116.5 that not every kind of advance or credit card charge by an individual on behalf of a candidate should be deemed a contribution. It pointed to one kind of potential practice that it wanted to restrict through the regulation:

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Although many campaign workers may only be able to advance relatively small amounts, individuals with sizable resources may have the ability to circumvent the contribution limitations by paying committee expenses and not expecting reimbursement for substantial periods of time. The Commission is concerned that this could occur <u>during critical periods in a campaign when a candidate's authorized committee may be experiencing financial difficulties.</u>

(emphasis supplied) Explanation and Justification Assuming arguendo that preventing this kind of injection of wealth into a campaign could be a compelling state interest, this interest is inapplicable to the Committee's transactions in this case. In the instant case, the individuals <u>did</u> expect prompt reimbursement -- in fact, with respect to credit cards, the payment was so prompt that it was not "reimbursement" <u>per se</u> because the Committee paid the charges directly to the credit card company before the individual was out of pocket any money at all. Since 116.5's exemptions provide for a 30/60 day grace period and the Committee reimbursed almost all of the pertinent transactions within those time frames, the instant case does not involve postponement of "reimbursement for substantial periods of time."

The second Commission rationale is equally inapplicable. The timing and nature of the instant transactions had no relation to bailing out the Committee during a crucial competitive juncture in a primary election contest. For example, credit cards were not used to purchase \$50,000 worth of radio advertising time during the two days prior to a primary election. None of the transactions at issue had the potential to affect the outcome of any primary election. As described in the Miller Declaration, the practices that give rise to the alleged excessive contributions were part of the routine administration of campaign operations. The practices did not result in any corrupting injection of wealth into the Fulani campaign. If the Committee could have opened a Federal Express account without securing payment of the charges by credit card, if the candidate and her staffers had personal credit cards, if there were field offices around the country to make various purchases directly, then the Committee would have functioned <u>at the</u> <u>exact same level of expenditures</u> as it did under the practices it actually followed. In short, there is no compelling state interest in regulating the type of use of credit cards and other advances that is the subject of this MUR.

Even if there was a compelling state interest here, 116.5 as applied here is not the least restrictive means of achieving it. This is particularly the case because of its adverse impact on minor parties, independent candidates, and grassroots insurgents. In <u>Buckley</u>, 424 U.S. at 70, the Court recognized that:

the Government's interest in deterring the "buying" of elections and the undue influence of large contributors on officeholders may be reduced where contributions to a minor party or independent candidate are concerned, for it is less likely that the candidate will be victorious.

The FEC, in three advisory opinions, viz. 1975-44 (Socialist Workers), 1983-47 (Sonia Johnson), 1984-25 (Sonia Johnson), affirmed the need for construing FECA so as not to reduce the effectiveness of third-party candidates, to insure such candidates have equal opportunities to participate in the electoral process. This is consistent with the principle that the First Amendment may require a modification of otherwise valid election regulation when the laws are applied to certain minor parties. <u>Brown v. Socialist Workers '74 Campaign Committee</u>, 459 U.S. 87 (1982).

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Applying 116.5 in the instant case affirmatively discriminates against candidates whose constituency is at a lower economic stratum of the electorate and thereby violates the central purpose of Act, i.e. to neutralize the advantages for a candidate who has wealthy supporters. The regulation limits the exemption to travel and subsistence expenses by the credit card holder and <u>for</u> the credit card holder, and conditions the exemption on payment of the credit card account charges by the campaign within 60 days of the closing date on the credit card statement.¹⁰ Thus the regulation makes unlawful practices engaged in by the Committee to deal with the obstacles created by running a campaign staffed by individuals with less wealth than a more established campaign, and creates narrow exemptions from its prohibitions that assist the

¹⁰ Also, there is the 30 day grace period for reimbursement of non-credit card staff advances, but again this is limited to advances made for travel and subsistence by the person making the advance.

campaigns with a wealthier stratum of staff and volunteers -- whose supporters generally have credit cards.

The Commission must interpret and apply the regulation in a manner that takes into account the practical realities of the Fulani campaign (and other similar grass roots candidacies). Its enforcement activities herein are plainly inconsistent with the purposes of FECA and unconstitutional.

C. The Underinclusiveness of the "Exemption" In 11 C.F.R. § 116.5 Renders the Regulation Unconstitutional As A Violation Of The Equal Protection Principle of the Fifth Amendment

By adopting the exemptions and safe harbors of 116.5, the Commission

recognized that not all staff advances should be deemed contributions. However, as discussed above, it promulgated a regulation which exempts transactions in ways that are contrary to the purposes of FECA, discriminatory, and unconstitutional under the First Amendment.

> [FECA]'s contribution and expenditure limitations operate to regulate the most fundamental of protected First Amendment activities. Discussion of public issues and debate on the qualifications of candidates are integral to the operation of the system of government established by our Constitution. The First Amendment affords the broadest protection to such activities to "to assure [the] unfettered interchange of ideas for the bringing about of political and social changes desired by the people.

<u>Buckley v. Valeo</u>, 424 U.S. 1, 14 (1976) (internal citation omitted). FECA's contribution limitations' primary purposes are to limit the actuality and appearance of corruption resulting from large individual financial contributions. *Id.* at 26 The interests served by restricting the size of financial contributions must be weighed against the effects of these limitations on an individual contributor's First Amendment freedoms. Restrictions on financial contributions must not discriminate and selectively abridge First Amendment rights in violation of the Fifth Amendment.

Equal protection analysis in the Fifth Amendment area is the same as that under the Fourteenth Amendment. <u>Weinberger v. Wiesenfeld</u>, 420 U.S. 636, 638 n.2 (1975); <u>Bolling v.</u> <u>Sharpe</u>, 347 U.S. 497, 499 (1954). The Constitution invalidates governmental choices which are "clearly wrong, a display of arbitrary power, not an exercise of judgment." <u>Matthews v. deCastro</u>, 429 U.S. 181, 185 (1976).

"Underinclusiveness" is one variant of approximation which the Court may invalidate as too arbitrary. <u>O'Brien v. Skinner</u>, 414 U.S. 524 (1974) (overturning a state statute allowing incarcerated persons to vote by absentee ballot only if confined in county where they were not resident); <u>See also</u>, Tussman & tenBroeck, "The Equal Protection of the Laws," 37 Cal.L.Rev. 341, 348-51 (1949). Underinclusive classifications do not include all who are similarly situated with respect to a rule, and thereby burden less than would be logical to achieve the intended governmental end. Tribe, <u>American Constitutional Law</u>, 2nd ed., p. 1447 (1988). The Supreme Court noted in <u>Railway Express Agency, Inc. v. New York</u>, 336 U.S. 106, 112-13 (1949) that

nothing opens the door to arbitrary action so effectively as to allow ... officials to pick and choose only a few to whom they will apply legislation and thus to escape the political retribution that might be visited upon them if larger numbers were effected.

Professor Lawrence H. Tribe further warned that

[i]n benefiting a smaller group than would be logical in light of a law's purposes, the legislature may have chosen to exclude the politically powerless for no better reason than that it fears reprisal from this group less than it does others. Tribe, op. cit., p. 1448 n. 11.

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The constitutional mandate of equal protection governs not only discriminatory legislation, but discriminatory executive and administrative behavior as well. *Id.* at 1451, 1482-83; <u>See, e.g., Yick Wo v. Hopkins</u>, 118 U.S. 356 (1886); <u>Shapiro v. Thompson</u>, 394 U.S. 618 (1969). A law or regulation may be "fair on its face and impartial in appearance" but still have an unequal impact and be deemed unconstitutional. <u>Yick Wo, op. cit.</u>

First, limiting the exemption to advances for <u>one's own</u> travel and subsistence is underinclusive. Instead, the 30/60 day grace period for a committee to reimburse staff advances should apply to all travel and subsistence expenses incurred in the normal course of campaign work. When three Fulani campaign workers traveled to New Hampshire and needed plane tickets and hotel accommodations, but only one of them had a credit card, the person with a credit card should be able to charge the expenses for all three persons and have the campaign pay the credit card company within 60 days. It is respectfully submitted that there is no practical, legal, moral, or logical reason why a credit card cannot be used for one's own travel but not for others traveling to the same location for the same purpose.

Second, limiting the exemption solely to travel expenses is underinclusive. Advances for other routine travel and subsistence operational expenses which are paid for by the campaign in a normal vendor payment cycle should not be considered "contributions." When a committee operates in the way the Fulani campaign did, where there are not numerous offices from which to disburse funds, it is really impossible to function if an individual cannot make purchases on behalf of the Committee and then get reimbursed.

The distinction between paying for one's own travel and subsistence and paying for a colleague's travel and subsistence is wholly arbitrary and, actually, *contrary* to the purpose of 116.5, viz. to facilitate the travel of campaign "field workers" without having to provide them with committee credit cards. 55 <u>Fed. Reg.</u> 26,382 (June 27, 1989). If the Commission wants to help facilitate field workers' travel, why limit a worker's credit card use to only the travel of that worker/cardholder? The more workers permitted to travel on one worker's credit card, the less committee credit cards need to be distributed to "outsiders," "unknown entities," or "potential loose cannons." The less individuals having committee credit cards, the more control a committee has over its spending. Furthermore, as noted <u>supra</u>, although FEC § 431(8)(B)(iv)was cited by the Commission as authority for the regulation, it does not limit the "travel" exemption to just personal travel.

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The exemption provided for in the regulation is facially neutral. However, it has a substantial negative impact on the Committee. Although the Commission attempted to ameliorate the regulation's impact by exempting certain transactions, the exemptions do not help the Committee. As stated above, few Committee staff people held credit cards. The Committee and the candidate were unable to obtain credit. Thus, the Committee was unable to benefit from the exemption provided in 116.5.

In contrast, major party candidates are more likely to have hundreds or thousands of field workers holding credit cards.¹¹ In the rare instance where a credit card is needed for travel and the worker does not have her own, the committee credit card of an established

¹¹ Some of these cards are undoubtedly guaranteed by parents or others and thus, are dodging Commission scrutiny (see infra).

campaign is always available. Thus, the regulation provides yet another advantage for major party committees which cannot be utilized by minor campaigns, effectively disadvantaging grassroots candidacies.

In sum, the regulation draws an arbitrary line between use of a credit card for personal travel and use for travel of others. § 116.5 is underinclusive and therefore, unconstitutional. <u>Cf. Lubin v. Parrish</u>, 415 U.S. 709, 716 (1974) ("a restriction can be sustained only if it furthers a vital governmental interest by means that do not unfairly or unnecessarily burden either a minor party's or individual candidate's equally important interest in the continued availability of political opportunity."); <u>Buckley</u>, at 94.

In addition, limiting 116.5's exemption to travel and subsistence expenses is underinclusive. Advances for other routine operational expenses which are paid for by the campaign in a normal vendor payment cycle should not be treated by the Commission as "contributions." While the regulation arbitrarily allows workers to advance payment for personal travel and subsistence, it disallows advances for other important transactions.¹²

As applied in the reason to believe determination, the regulation infringes upon Fulani's ability to run a presidential campaign in the modern commercial economy because of her lack of wealth and lack of wealthy constituents, staff and volunteers. It gives yet another advantage and tool to established parties and candidates at the expense of grassroots candidates

¹² The Committee, for example, did not have offices around the country from which individuals could obtain a check to purchase goods necessary to accomplish their work. Rather, it was necessary for individuals to pay for such goods and then be reimbursed by the national office. Disallowing these types of transactions severely hampers the ability of a minor party or grassroots candidacy to political expression, participation, speech and association.

and parties, by exempting from the definition of contribution charges incurred by an individual for their own travel and subsistence, but not exempting the use of others' credit cards for such uses. Thus the regulation makes it easier for major party campaigns to operate, i.e. they can now use a campaign credit card, where needed and appropriate, *and* personal credit cards in limited circumstances. The Committee, on the other hand, did not have the option of using a campaign credit card *and* could not use personal credit cards, except in limited cases, since Dr. Fulani and many staffers could not obtain them. Thus, 116.5 abridges the Committee's First Amendment rights in violation of the equal protection component of the Fifth Amendment. As the Court in Buckley held:

[R]estrictions on access to the electoral process must survive exacting scrutiny. The restriction can be sustained only if it furthers a "vital" governmental interest that is achieved by a means that does not unfairly or unnecessarily burden either a minor party's or individual candidate's equally important interest in the continued availability of political opportunity.

424 U.S. at 94.

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D. The Methodology Used By The Audit Division To Apply The Regulation Unfairly Increases The Calculation Of Excessive Contributions

For the reasons stated above, the Committee is not liable for any excessive

contributions arising from staff advances.¹³ Assuming arguendo that 116.5 could be applied to

¹³ The Committee requested through the Office of General Counsel that the Audit Division do a computer run that would show the reduced amount of alleged excessive contributions that would apply to each of the 14 individuals if all of the transactions had the benefit of the 60 day grace period (and the additional grace resulting from the credit card statement closing date rule). The Audit Division representative stated that it was against agency policy to conduct such a reanalysis, and therefore denied the request. The representative also informed the Committee that agency policy precludes providing the Committee with the software program developed by the agency to do the computer analyses of excessive contributions.

the Committee in a manner that results in the calculation of excessive contributions, there are three flaws in the Audit Division's methodology that must be corrected. The alleged amount of excessive contributions must then be recalculated using the revised methodology.

> 1. <u>The Commission Failed To Apply § 431(8)(B)(iv) To The Instant</u> <u>Transactions. And Thereby Overstated The Amount Of Alleged Excessive</u> <u>Contributions</u>

As discussed above, FECA expressly excludes from the definition of

"contribution":

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any unreimbursed payment for travel expenses made by any individual on behalf of any candidate or any political committee of a political party, to the extent that the cumulative value of such activity by such individual on behalf of a single candidate does not exceed \$1,000 with respect to a single election, and on behalf of all political committees of a political party does not exceed \$2,000 in any calendar year.

2 U.S.C. §431(8)(B)(iv) (the "subsection"). The plain meaning of the subsection is unreimbursed expenses for travel up to \$1,000 are not counted as contributions, i.e. are not counted towards the \$1,000 limit on contributions by an individual. Indeed, if this \$1,000 exclusion were not separate from the direct contribution limit of \$1,000 under 441a(a)(1)(A), then the subsection would be pointless. Absent the subsection, all unreimbursed expense advances would count as direct contributions, regardless of whether they were for travel expenses, photocopying, printing costs,

There are repeated references in this Response to the "60 day" safe-harbor, the grace period for the reimbursement of exempt transactions. In fact, with respect to properly documented credit card charges for personal travel the safe harbor period for reimbursement is always greater than 60 days (except for the rare case of charges made on the last day of the billing cycle). The 60 day grace period for exempt charges does not begin on the date of the charge, but on the closing date of the monthly credit card bill. For example, if a charge is made on January 15, and the statement closing date is January 31, then the grace period ends 60 days after January 31. In this example, the actual safe harbor for reimbursing the charge is 76 days.

or advertising space. Furthermore, the subsection does <u>not</u> limit the exclusion to travel expenses for one's <u>own</u> travel. Rather, it broadly refers to travel expenses "on behalf of any candidate." Thus, the payment could include travel expenses of the candidate, of campaign workers or of volunteers. It does not refer to payment for travel expenses incurred solely by the person making the payment.

In the analysis which is the basis for the reason to believe determination, the Audit Division's threshold for each individual -- beyond which an "excessive contribution" was registered -- was solely the threshold of \$1,000 in direct contributions by the individual. That threshold is incorrect. The threshold should have been calculated as follows: First, unreimbursed travel expenses up to \$1,000 would be excluded from "contributions." 2 U.S.C. § 431(8)(B)(iv) Second, the individual's direct contributions would be subtracted from \$1,000, yielding the available amount of additional direct contributions. 2 U.S.C. § 441a(1)(A)(a). That number would be the threshold beyond which excessive contributions would be calculated. Finally, any remaining unreimbursed expenses not within the 116.5 safe harbor would be offset against the individual's available amount of additional direct contributions. Only the remaining unreimbursed expenses should be deemed excessive "contributions."

The reason to believe determination is based upon advances by 14 individuals. The analysis as to each individual deprived the individual and the Committee of the benefit of the \$1,000 exclusion under 431(8)(B)(iv). Accordingly, even if it is determined that the regulation should apply to the Committee in its current form, the Audit Division's analysis significantly overstated the alleged excessive contributions. The Audit Division should be able to calculate the exact overstatement by modifying its software program to conform to the subsection and doing another computer run. The amount of overstatement is likely to be in the range of \$14,000.

Allocating reimbursements by FIFO unfairly inflates the amount of excessive contributions

The Audit Division's analysis of staff advances did not allocate reimbursements according to the designation of the respective campaign treasurers. Instead, the Audit Division artificially allocated the reimbursements on the basis of FIFO. The Audit Division <u>could</u> have used a straightforward methodology of tracking the reimbursement of expenses on an item by item basis. Consider this hypothetical situation. Smith charges an exempt transaction of \$100.00 on January 15, and a non-exempt transaction for \$50.00 on January 20. On January 21, the committee reimburses Smith \$50.00 for the nonexempt transaction. On January 21, the nonexempt transaction should be closed, after having been outstanding for merely one day. Not so, under the Audit Division's artificial methodology. Even though the committee earmarked the \$50.00 reimbursement to close out the non-exempt transaction, the audit methodology will not credit it against that charge. Instead, it will credit the \$50.00 payment on January 21 to reduce the <u>exempt</u> charge of \$100.00, because that charge was made first. It uses a "first in/first out" methodology even though this distorts the actuality that exempt and non-exempt charges operate under separate rules.

Respondents contend that it is inappropriate for a law enforcement agency to use an artificial methodology that inflates alleged violations, when no less respectable and sound accounting approaches would minimize the magnitude of the alleged violations. With regard to staff advances, the Audit Division should have applied reimbursement payments <u>first</u> to reduce any outstanding excessive contribution. The Commission should instruct the Audit Division to recalculate the Committee's schedules of staff advances accordingly. This recalculation will reduce the alleged amount of staff advances.

 Lauren Ross, Lenora Fulani, Cathy Stewart, Francine Miller, Deborah Green, Ada Ivonne Vasquez, Amy Freeman, Kate Gardner, Todd Bentsen, Bonnie Gilden, Jeffrey Aron, Christopher Barclay, and Cathy Salit should be deemed to be account holders for purposes of classifying expenses as personal

As related above, and in the Miller and Ross Declarations, the Committee lost the benefit of the grace periods of 116.5 with respect to tens of thousands of dollars in transactions merely because the card holder was one individual and the account holder was someone else. The candidate, Lenora Fulani, charged travel and subsistence expenses to a credit card issued in her name, on the account of Eleanor Fain. This was done because the candidate herself did not have adequate credit to obtain a major credit card account of her own. As a result, all of the charges made by the candidate for her travel and subsistence were deemed charges <u>not</u> within the safe harbor of 30/60 days because it was she, not Eleanor Fain, who was traveling around the country and staving in hotels, etc.

Lauren Ross charged many expenses for her own campaign related travel (i.e. car rentals) but the auditors excluded all of them from the 30/60 day grace periods because the account holder was her father, James Ross. The campaign manager, Frederick Newman, authorized the Campaign Operations Coordinator, Cathy Salit, to make charges on his credit card account. The auditors did not apply the 30/60 grace period to any of these transactions, even if they were for the personal travel and subsistence of Ms. Salit on campaign business. Nancy Ross had a number of cards issued on her credit card account to individuals. If those individuals used

their cards for personal travel or subsistence on campaign business, the auditors would deny the transactions the 30/60 day grace period because the account holder was Nancy Ross.

This denial of the exemptions for these transactions is arbitrary. The Commission's auditors do not routinely require that someone who uses a credit card for campaign expenses demonstrate that no third party is a guarantor of the credit card account.14 Therefore, in their audits of other committees in 1992, the Audit Division undoubtedly granted the personal use exemption of 116.5 to credit card users who had guarantors on their account. There is no relevant functional distinction between an arrangement in which James Ross authorized Lauren Ross to use his account, and an arrangement in which James Ross serves as a guarantor thereby enabling Lauren Ross to obtain a credit card on her "own" account. However, based on audit practices, the difference between the two arrangements can result in thousands of dollars of transactions being deemed unlawful excessive contributions. This distinction is unfair and serves no legitimate purpose of the Act. It rewards Committees and individuals who have third party guaranteed credit cards for campaign staff knowing that the government auditors are not likely to find out about the guarantees. If the Committee had been aware of the new regulation it would have reasonably considered whether or not to try to arrange for a number of campaign staff to have credit card accounts opened in their names as a result of

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¹⁴ Representatives of the Audit Division so informed Committee counsel in a technical consultation arranged by the OGC in connection with the Committee's preparation of this response. The representatives did say that if they actually obtained information disclosing that there was a guarantor for a credit card account then the guarantor rather than the card holder might be deemed to be the account holder for the purposes of 116.5. However, they stated that it was not part of the audit methodology to require every individual who used a credit card for campaign expenses to represent or demonstrate affirmatively that there was no guarantor on his or her credit card account.

third party guarantees, so that the Committee could benefit from the same loophole that other committees would benefit from.

It is respectfully submitted that the purposes of FECA are not served by distinctions like this, and that the lawfulness of a committee's actions should as much as possible be based upon the substance of transactions in relation to the purposes of the statute, and not based upon mere technicalities or the manipulation of loopholes in legal standards or in audit practices. Indeed, if the Committee had been aware of the regulation, it would probably have found technically proper ways to mitigate some of the impact of 116.5's restrictions. (It certainly could not have mitigated most of the impact.) But this is not what regulation in this sensitive area of First Amendment activity should be about. The above-listed persons should be considered the same as account holders for the purposes of applying the 116.5 exemptions for the kinds of transactions that are the subject of this MUR. The relationships above are the functional equivalents of guarantees and the Fulani Committee should not be treated differently.

POINT III: ASSUMING ARGUENDO THAT THE INSTANT STAFF ADVANCES ARE DETERMINED TO BE EXCESSIVE CONTRIBUTIONS, THE COMMISSION SHOULD TAKE NO FURTHER ACTION AND NO PENALTY SHOULD BE ASSESSED

Respondents demonstrated in Point I, <u>supra</u>, that the Commission is barred from prosecuting this MUR, irrespective of whether or not the Committee received excessive contributions in the form of staff advances. In Point II, <u>supra</u>, respondents demonstrated that under applicable legal principles, the Committee did not receive excessive contributions, i.e. there is no liability. In the instant Point III, it will be shown that even if there were excessive contributions, the Commission should take no further action, consistent with the proper ordering of the Commission's priorities and resources. The circumstances that gave rise to the alleged staff advances mitigate any liability. The alleged violations did not cause any of the kind of corrupting influence on the electoral process that FECA is supposed to remedy. The Commission should follow its own precedents in MUR 3789 (Agran), MUR 3947 (Kerry) and MUR 4014 (Republican Convention Committee), in which the Commission took no further action after finding violations of 116.5.

There are numerous elements of this case discussed earlier in this brief which are not only relevant to the jurisdiction and liability issues, but which also are mitigating factors to be considered if there were to be a finding of liability. They include the following:

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1. The Committee Treasurer was unaware of the new regulation, 116.5, and did not knowingly violate it. Miller Dec. To the contrary, the Treasurer, believing in good faith that the staff advance practices of the Committee were in compliance with FEC regulations, maintained documentation and records of the credit card usage and staff advances and these records were duly available for review by the field auditors. Hence, there was no intent to commit a violation and no failure of disclosure of the underlying transactions to Audit Staff.

2. The practices of the Committee regarding use of personal credit cards and other staff advances were engaged in not to increase the resources of the campaign, but merely to allow the campaign to operate in the modern commercial economy. As demonstrated <u>supra</u>, and in the Miller Declaration, the grassroots Fulani campaign could not even begin to compete in the electoral arena without the use by individuals of their credit cards on behalf of the Committee without respect to whether the charge was for their own or someone else's travel, and without the ability to have staff members in the field advance expenses. The Committee was not enriched. The Committee paid for the expenditures charged to the credit cards in time frames that are consistent with standard commercial practices. The alleged violations at issue arise merely from the technicality that the transactions were engaged on the accounts of individuals rather than on the account of the Committee.

3. One of the rationales given by the Commission for 116.5 is that it will prevent advances from being used to infuse resources into a campaign at a critical juncture. For example, the regulation prevents a cash strapped campaign from using personal credit lines to purchase \$50,000 of radio time two days before a crucial primary election and to buy \$10,000 worth of airplane tickets to send a team of campaign workers across the country for a last minute voter pull operation. But this rationale is not applicable to the Fulani Committee. As stated above, the use of credit cards and advances was a routine operational function necessary to interface with commercial vendors. The practices engaged in by the Committee did not enable it to launch any campaign initiatives that it was not already in a position to carry out; it solely provided a medium for purchasing the necessary goods and services.

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The instant advances did not tilt any election contest in favor of Fulani.
 The advances did not have any potential whatsoever to affect the outcome of any election contest.

 The advances were promptly reimbursed without any intervention by the Commission. Long before the field audit, there were no unreimbursed advances. Hence, no disgorgement of funds was ever necessary.

 There is no need to impose a sanction to deter future violations by Fulani in any future election contests. Both in 1988 and in 1992, the Final Audit Reports for the Fulani Committees demonstrated excellent compliance with FECA. The statement by the respondents that if these practices are improper then they will not be followed in the future is completely credible, and no onerous financial penalty is needed to reinforce it.

7. Although the reason to believe determination sets for a figure of \$105,114.82 in alleged excessive contributions from staff advances, this alleged figure must be significantly reduced because of (a) inclusion of non-campaign related expenses; (b) failure to apply the exclusion of \$1,000 per person under 2 U.S.C. § 431(8)(B)(iv); and (c) improper use of FIFO methodology instead of crediting payments to reduce first the advances that are creating liability for excessive staff advances.

While the above-stated mitigating factors are sufficient grounds in and of themselves for the Commission to take no further action, such a result is also required by Commission precedents. There is no fair rationale for assessing a penalty against the Fulani Committee when the Commission imposed no penalty on Agran, Kerry, or the Republican Convention Committee. Indeed, no penalty was assessed against the Kerry Committee even though the committee was permanently enriched by the staff advances. Kerry did not reimburse any of the \$8,977.65 advances by respondent Diller for fundraising expenses during Kerry's candidacy. Much later, Kerry entered into a debt settlement plan which provided only for <u>partial</u> payment of the advances. The Commission approved the plan and did not require disgorgement by Kerry of the amount the committee was enriched by the advances nor did the Commission impose any penalty on Kerry. Such lenient treatment was accorded Kerry even though he had been considered a contender in the Democratic Party primary process and, therefore, the amounts



by which his campaign was enriched by staff advances had the potential to affect the outcome of a primary election.

The Commission has proposed a conciliation agreement

Finally, to put it into a broader perspective, one fails to see how the Commission can fairly prioritize the instant alleged violations for use of its limited enforcement resources when the Commission has failed to prioritize and pursue audit repayment or enforcement in cases involving vastly more money and much clearer culpability. Most striking is its failure to pursue against the 1992 Clinton Committee the staff findings that the Clinton Committee engaged in an egregious, unlawful manipulation of its finances that netted it approximately \$2 million in excess government funds. The Commission failed to take action either in the audit process or in response to complaint-initiated MUR 4192 to recover the \$2 million from the Clinton Committee for the Treasury.

CONCLUSION

For all of the aforestated reasons, the reason to believe determination should be vacated and this proceeding terminated. In the alternative, the Commission should made a finding that the Committee did not make any excessive contributions through staff advances. In the further alternative, if there are any excessive contributions, the Commission should assess no penalty and take no further action.

Dated: New York, N.Y. August 2, 1996

Respectfully Submitted,

lola

ARTHUR R. BLOCK Attorney at Law Attorney for Respondents 72 Spring Street, Suite 1201 New York, NY 10012 (212) 966-0404

On the Brief:

A.

Arthur R. Block, Esq. Michael R. Bressler, Esq.

The assistance of law student Edward Taibi is gratefully acknowledged.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

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Lenora B. Fulani for President Committee and Francine Miller, as Treasurer

MUR 3969

DECLARATION OF NANCY ROSS

I, NANCY ROSS, make the following declaration under penalty of perjury:

 During the 1992 presidential campaign, I was the Chief Lobbyist for the Rainbow Lobby, Inc. (the "Lobby"), a not-for-profit, 501(c)(4) membership and lobbying organization. I make this declaration in support of the response of Lenora B. Fulani for President (the "Committee"), and Francine Miller, as Treasurer, to MUR #3969, opened by the Federal Election Commission ("FEC" or "Commission") regarding staff advances under 11 C.F.R. 116.5(b). I have personal knowledge of the facts stated herein.

2. The Rainbow Lobby was founded in 1986, and became a nationwide membership organization of over 200,000 citizens. It was a non-partisan, grassroots citizens lobby that supported legislation promoting election reform and human rights internationally. The Lobby performed many activities, including publishing a quarterly newsletter, initiating and lobbying for legislation, presenting testimony to various governmental agencies on a wide variety of topics,¹ and organizing forums, conferences and Congressional tours.²

3. According to counsel to the Committee, the Audit Division issued an interim audit report which found \$6,711.52 in excessive contributions from me to the Committee in the form of staff advances based on expenses charged to my American Express account. After the issuance of the interim audit report, upon request by the Commission, I voluntarily provided the Committee (for submission to the Commission) monthly statements for my American Express account which the Committee did not have in its possession (since there were no campaign-related charges incurred for those months).

4. I have been informed by counsel to the Committee that the Commission has preliminarily determined from the monthly statements I submitted that a substantial number of charges appearing on my American Express card statements from January, 1992 through September, 1992 were charges incurred on behalf of the Committee, and therefore are deemed to be contributions from me to the Committee. In MUR #3969, therefore, the Commission has preliminarily determined that I gave \$19,455.23 in excessive contributions in the form of staff advances to the Committee. To make such a determination, the Commission erroneously found that \$16,139.66 in charges on my American Express statements were incurred on bahalf of the Committee.

¹ For example, the Lobby made written and oral presentations to the FEC in its <u>MCFL</u> Rulemaking Proceeding in October 1992.

The Lobby dissolved in the spring of 1993.

5. I authorized a number of different cardholders on my American Express account, mostly members of the Rainbow Lobby staff. Cardholders had my permission to use their cards for both business and personal expenses. Some of the personal expenses cardholders could have charged were expenses they incurred as supporters of the Fulani campaign.

6. Cardholders who incurred expenses on behalf of the Committee submitted such expenses to the Committee to be paid, and to my knowledge, the Committee always paid such expenses in the ordinary course of business directly to American Express. Staff who incurred personal expenses which were not on behalf of the Committee were required to reimburse those charges as well.

7. According to counsel to the Committee, the Commission has determined that every charge on my American Express card for expenses related to "travel, subsistence and related expenses" -- i.e., expenses that look like they could be campaign-related -- and which were incurred during the time period cardholders on my account incurred expenses on behalf of the Committee which were paid by the Committee, should be considered campaign-related and thus treated as contributions for purposes of the Audit Division's analysis. This criteria -- the time period and the type of charge -- is extremely unreliable since expenses incurred by cardholders on my American Express account which were actually incurred on behalf of the Lobby were similar to those incurred by staff members on behalf of the Committee and were incurred during the same time period.

I reviewed my American Express statements for the closing dates of
 February 20, 1992 through September 20, 1992 to analyze the expenses the Audit Division
 deemed to be incurred on behalf of the Committee, and to set forth, where possible, the actual

purpose of the charges. Attached as Exhibit A is the "Review of Credit Card Documentation Provided Subequent to the IAR (via Subpoena Process)," prepared by M. Favin (the "Favin Analysis"), provided to counsel to the Committee to assist it in responding to the instant MUR, coded to reflect the following types of expenses which were clearly not incurred on behalf of the Committee.³

9. There are several charges that appear on my credit card statements which were completely credited in later statements because they were not valid charges (and so, in fact, were never paid). For example, there are two charges, dated February 28 and 29, 1992, for \$1,302.44 and \$1,608.09 respectively, which were credited in full in later statements. (See Exhibit B.) In addition, there is a charge dated September 1, 1992 for \$872.54 which was disputed, and a credit for \$589.61 toward such charge appears on a later statement. (See Exhibit C.) These charges are coded "A" on the Favin Analysis, and total \$3,500.14.

10. There are charges that the Commission determined were campaign-related that reflect the personal expenses of cardholders. Such charges include several airplane tickets (one for our receptionist and one for the fiance of one of the cardholders); these charges are coded "B" on the Favin Analysis, and total \$456.00.

11. The Lobby had offices in New York City and Washington, D.C., and there was a substantial amount of travel by staff members between the two cities. Deborah Green, Ada Ivonne Vazquez, Amy Freeman and Kate Gardner, for example, were located in New York,

³ Note that the only entries relevant on the Favin Analysis to my American Express account are those under "Nancy Ross." Note also that in his analysis, Favin did not state every time a charge was actually paid by the Committee.

while the rest of the Lobby staff who were cardholders were located in D.C. With a few minor exceptions, all the charges to Amtrak and to the airplane shuttle between New York and D.C. are for cardholders' travel between the two cities on Rainbow Lobby business. These charges, as reflected in the Favin Analysis coded "C", total \$4,648.00.

12. There are many charges to Compuserve reflected on the American Express bills attributed to cardholder Christopher Barclay. Mr. Barclay accessed Compuserve predominantly to obtain news articles regarding Africa, as he was the Lobby's main lobbyist on issues concerning the various countries we were concerned with on the African continent. To my knowledge, Mr. Barclay never accessed Compuserve on behalf of the Committee. Mr. Barclay was also responsible for managing the Lobby's computer operations, and thus charges appear on the credit card statements for related purchases. These charges, as reflected in the Favin Analysis coded "D", total \$1,310.04 during the relevant period.

13. In order to keep informed regarding current events and analyses, the Lobby subscribed to many publications, some of which were charged to my American Express account. Charges for all such publications on my American Express card were incurred on behalf of the Lobby, and as reflected in the Favin Analysis coded "E", total \$854.44 on the bills during this period.

14. A substantial responsibility of Lobby staff members was fundraising and membershipping by canvassing neighborhoods, walking door-to-door, and asking people to join the Lobby by paying a membership fee. Thus, staff members charged automobile expenses (rentals or automobile maintenance) on my American Express card, as well as lodging while travelling on such business. In addition, the staff also travelled both domestically and

internationally for speaking engagements or Rainbow Lobby events. Charges related to these speaking engagements or events might be incurred for airfare, rental cars, and lodging. These types of charges incurred on behalf of the Lobby during this period and reflected in the Favin Analysis coded "F" total \$1,875.08.

15. Some of the advertising the Lobby did was charged to my American Express card. Generally, the Lobby advertised for student interns and for fundraisers. The total charges on the bills I reviewed for this type of expense as reflected in the Favin Analysis coded "G" were \$304.69.

16. Occasionally, the Lobby would subsidize individuals' expenses for travelling to New York or D.C. to lobby on certain issues, to attend conferences, or to attend other kinds of political meetings or events; in these instances, individuals' travel and lodging would be paid for by the Lobby. Charges of this nature, as reflected in the Favin Analysis coded "H," totalled \$3,145.05 during this period.

17. Amy Freeman, one of the cardholders I authorized on my American Express account, was the accounts payable clerk and general office manager in the New York office. As such, she would purchase various items for the office and charge them to my American Express card. She never charged these types of goods on behalf of the Committee. Bonnie Gildin, another Lobby staff member, also occasionally purchased supplies. Charges such as these, as reflected in the Favin Analysis coded "I", total \$46.22 in the bills I reviewed.

18. In sum, as reflected on the Favin Analysis, the Commission has overstated the Committee-related charges on my American Express account by \$16,139.66, and thus, the amount of excessive contributions in MUR # 3969 is erroneous.

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Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing

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is true and correct to the best of my knowledge and belief. Executed July 31, 1996.

Mancy Ross NANCY ROSS

Lenora B. Fulani for President

Exhibit A

MLF003114

Review of Credit Card Documentation Provided Subsequent to the IAR (via Subpoena Process) Prepared by M.Favin

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	Name (Position)	Missing Statements	W/P Location	<u>Campaign</u> <u>Charges</u>	Trans. Date	Description
1	. <u>John Opdvcke</u> (Fundraiser) On LBF P/R	7/92.8/92	F-13/1	\$1,866.00		Federal Express (104 charges) LBF for Dres Paid LBP#5998 \$1,866.00 8/1/92
2	<u>Eleanor Fain</u> Not on P/R Rec'd Reimbs	9/92	F-9/1(C)	8.60	8/29/92 9/18/92	Computer Access-Compuserve Publications (Bill in dispute)
3	David Belmont (Ballot Access Coordinator/ Audit Prep.) On LBF P/R	10/91,11/91	P-11/1	194.84 415.50 580.92 121.52 329.58 1,320.50 98.50 122.50	11/7/91 11/06/91 11/13/91	Car Repairs NY Car Rental NY Phone Rental Mail Order Products (9 charges) Airfare, Ins. DFW-NY R.Faust Airfare, Ins. BOS-NY D.Belmont
· 4	Margaret Golden (Fundraiser) On LBF P/R Marsha Plafkin	9/91-1/92	F-11/1	160.50 218.00 140.68 242.48 142.83 40.88 418.00 997.26	10/91 10/24/91 11/04/91 11/17/91 1/07/92	Target Stores CA Gen'l Merch. Airfare SF Purchase Car Rental Milbrae, CA Car Rental SF Purchase Target Stores CA Gen'l Merch. Target Stores CA Gen'l Merch. Airfare By Mail (MI) Car Rental SF Purchase
X	(Fundraiser) On LBF P/R		F-1671			
6.	Nancy Ross Not on P/R Rec'd 2 Reimbs 5/5	2/92-9/92	F-13/1	C 83.00 C 69.00 D 32.38 D 60.68	2/02/92 1/18/92	Amtrak DC-NY N.Ross Amtrak NY-DC N.Ross Comp. Access-Compuserve C.Barclay Comp. Access-Compuserve C.Barclay

Name

(Position)

6. Nancy Ross

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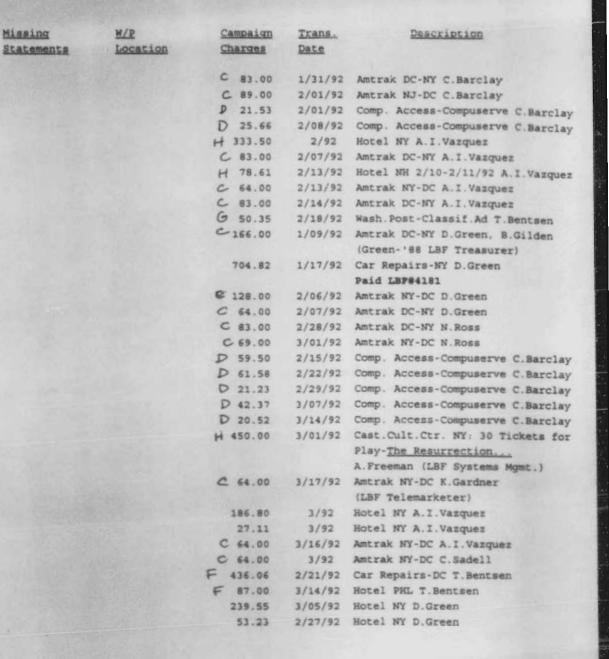
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6. Nanc. Ros (cont'd)

Name (Position)	Missing Statements	W/P Location	<u>Campaign</u> <u>Charges</u>	Trans. Date	Description
anc. Ross			A 1,302.44	2/28/92	Hotel NY D.Green
cont'd)			A 1,608.09		Hotel NY D.Green
cours an			263.07	3/12/92	
			C 49.00		Amtrak NY-DC D.Green
			C 249.00		Amtrak DC-NY D.Green
			36.20	C.F	Hotel FL J.Aron (LBF Fundraiser)
			30.79		Hotel FL J.Aron
			93.08		Car Rental FL J.Aron
			128.96		Car Rental IN 3/17-3/20 J.Aron
			C 83.00		Amtrak DC-NY N.Ross
			D 79.85		Comp. Access-Compuserve C.Barclay
			F 145.70		Car Rental DC C.Barclay
			D 40.97		Comp. Access-Compuserve C.Barclay
			D 29.45		Comp. Access-Compuserve C.Barclay
			G 150.00		Village Voice Ad K.Gardner
			C 64.00		Amtrak DC-NY K.Gardner
			C 128.00		Amtrak NY-DC K.Gardner
			C 64.00		Amtrak DC-NY A.I.Vazquez
			C 83.00		Amtrak NY-DC A.I. Vazquez
			C 83.00		Amtrak NY-DC A.I.Vazquez
			C 83.00		Amtrak DC-NY A.I.Vazquez
			C 83.00		Amtrak NY-DC A.I.Vazquez
			C 64.00		Amtrak DC-NY A.I.Vazquez
			C 83.00		Amtrak DC-NY A.I.Vazquez
			E 185.50	3/92	Publishing
			F 93.70		Hotel PHL T.Bentsen
			E 625.00		Nat.Tech.Info.Svc. FBIS PC
			6.409.77		Hotel NY D.Green
			C 89.00		Amtrak NY-DC D.Green
			100.80		Hotel Detroit J.Aron
			159.00		Airfare Det-Ind J.Aron
			352.00	and the second	Airfare Ind-Det-NY J.Aron
			C 166.00		Amtrak DC-NY N.Ross
			C 60.00		Airfare NY-DC N.Ross
			C 60.00		Airfare DC-NY N.Ross
			C 60.00	and the second	Airfare NY-DC N.Ross
			D 27.74	A CONTRACTOR OF THE OWNER	Comp. Access-Compuserve C.Barclay
			D 29.03		Comp. Access-Compuserve C.Barclay
			B 308.00		Airfare DC-LA-DC C.Reid

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Page 3 of 6

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Name (Position)

6. Nancy Ross (cont'd)

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Missing Statements	W/P Location	Campaign Charges	Trans. Date	Description
		D 37.47	5/02/92	Comp. Access-Compuserve C.Barclay
		B 148.00	5/04/92	Airfare DC-NY-DET-NY-DC S.Shivers
		D 24.75	5/09/92	Comp. Access-Compuserve C.Barclay
		H 90.00	4/92	Cast.Cult.Ctr. NY: 3 Tickets for Play-Dead As A Jew A.I.Vazquez
		C 83.00	4/20/92	Amtrak DC-NY A.I.Vazquez
		C 83.00	4/20/92	Amtrak NY-DC A.I.Vazquez
		C 89.00	5/04/92	Amtrak NY-DC A.I.Vazquez
		C 83.00	5/11/92	
		C 83.00	5/11/92	Amtrak NY-DC A.I.Vazquez
		H 796.26	5/11/92	Hotel DC T.Bentsen
		C 64.00	4/19/92	Amtrak NY-DC D.Green
		C 89.00	4/22/92	Amtrak NY-DC D.Green
		C 83.00	5/11/92	Amtrak DC-NY D.Green
		C 34.00	5/11/92	Amtrak PHL-DC D.Green
		31.89	5/01/92	Hotel: Ventura, CA J.Aron
		327.44	4/19/92	Car Rental LA 4/19-5/3/92 J.Aron
		38.75	5/03/92	Hotel: Riverside, CA J. Aron
		59.00	5/03/92	Airfare LA-OAK J.Aron
		330.08	5/03/92	Car Rental OAK 5/3-5/17/92 J.Aron
		F 130.00	5/11/92	Airfare DC-NY-BOS-NY-DC D. Waks
		C 60.00	6/14/92	Airfare NY-DC N.Ross
		D 79.50	6/11/92	Int'l Computer Networks C. Barclay
		D 17.10	5/16/92	Comp. Access-Compuserve C.Barclay
		D 26.16	5/28/92	PC Software C.Barclay
		D 24.47	5/23/92	Comp. Access-Compuserve C. Barclay
		D 15.87	5/30/92	Comp. Access-Compuserve C. Barclay
		P 18.84	6/06/92	Comp. Access-Compuserve C. Barclay
		E 43.94	5/26/92	Nat'l Journal-Books A. Freeman
		C 89.00	5/28/92	Amtrak NY-DC D.Green
		C 89.00	6/07/92	Amtrak NY-DC D.Green
		184.00	5/17/92	Car Rental LA 5/17-5/31/92 J. Aron
		C 60.00	6/22/92	Airfare DC-NY N.Ross
		D 26.73	6/20/92	Comp. Access-Compuserve C.Barclay
		P 35.02	6/20/92	Comp. Access-Compuserve C. Barclay
		D 27.53	6/27/92	Comp. Access-Compuserve C.Barclay
		D 14.70	7/04/92	Comp. Access-Compuserve C.Barclay
		F 265.25	7/06/92	Car Rental DC 6/26-7/6 C.Barclay
		D 13.52	7/11/92	

Page 4 of 6

Missing Statements	W/P Location	Campaign Charges	Trans. Date	Description
		I 24.57	7/10/92	Office Supplies NY A.Freeman
		C 64.00	7/03/92	Amtrak NY-DC A.I.Vazquez
		H 858.60	7/07/92	Airfare-No Info Y.Pastrana
		C 89.00	6/22/92	Amtrak DC-NY T.Bentsen
		C 89.00	6/22/92	Amtrak DC-NY D.Green
		341.97	7/03/92	Car Rental NY 7/3-7/7/92 J.Aron
		213.66	7/14/92	LA Times Ad J.Aron
		I 21.65	6/15/92	Bullhorn Purchase B.Gilden
		C 65.00	7/18/92	Airfare DC-NY N.Ross
		C 69.00	7/19/92	Amtrak DC-NY N.Ross
		C 89.00	8/14/92	Amtrak DC-NY N.Ross
		D 21.90	7/18/92	Comp. Access-Compuserve C.Barclay
		D 29.50	7/25/92	Comp. Access-Compuserve C.Barclay
		D 17.38	7/31/92	Jacobs Gardner C.Barclay
		D 23.65	8/01/92	Comp. Access-Compuserve C.Barclay
		D 10.55	8/08/92	Comp. Access-Compuserve C. Barclay
		D 224.76	7/20/92	Computer Sftwre/Hrdwre C.Barclay
		G 104.34	7/26/92	Wash.Post-Classif.Ad T.Bentsen
		C 85.00	8/03/92	Amtrak NY-DC D.Green
		C 64.00	8/05/92	Amtrak DC-NY D.Green
		160.56	7/20/92	LA Times Ad J.Aron
		257.64	7/21/92	Car Rental LA 7/7-7/21/92 J.Aron
		214.34	8/04/92	Car Rental LA 7/21-8/4/92 J.Aron
		213.66	8/07/92	LA Times Ad J.Aron
		280.00	8/17/92	Airfare LA-NY-LA J.Aron
		C 140.00	8/23/92	Airfare NY-DC D.Green
		D 13.04	8/15/92	Comp. Access-Compuserve C.Barclay
		D 14.86	8/22/92	Comp. Access-Compuserve C.Barclay
		D 22.37	8/29/92	Comp. Access-Compuserve C.Barclay
		P 17.88	9/05/92	Comp. Access-Compuserve C.Barclay
		F 106.00	8/21/92	Hotel MI K.Gardner
		F 91.37	8/23/92	Car Rental MI 8/21-8/23 K.Gardner
		H 538.08	8/21/92	Hotel NY 8/21-8/24 A.I.Vazquez
		F 260.00	8/13/92	Airfare DC-Det-DC K.Gardner
		F 260.00	8/13/92	Airfare DC-Det-DC D. Waks

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Name (Position)

6. <u>Nancy Ross</u> (cont'd)

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		Name (Position)	Missing Statements	W/P Location	<u>Campaign</u> <u>Charges</u>	Trans. Date	Description		
	6.	Nancy Ross		and any the second	C 64.00	8/27/92	Wmtrak NY-DC D.Green		
		(cont'd)			C 34.00		Amtrak DC-PHL D.Green		
					214.34		Car Rental LA 8/4-8/18/92 J.Aron		
					A 872.54	9/01/92	Car Rental LA 8/18-9/1/92 J.Aron		
	7.	Margaret Tanzosh	2/92-7/92	F-11/1.	475.63	2/14/92	Car Rental (National)		
		NOT OR P/R		V	1,732.98	3/19/92	Car Repairs-Santa Fe		
		Rec'd Retabs			48.15	4/92	Hotel-Phelan, CA		
					111.24	7/92	Hotel-Anchorage, AK		
			~		316.06	6/15/92	Car Rental (National)		
					358.31	6/30/92	Car Rental (National)		
					358.31	7/01/92	Car Rental (National)		
					119.15	7/92	Hotel-Anchorage, AK J. Williamson		
				-	447.13	6/07/92	Car Rental (National)		
					344.99	6/07/92	Car Rental (National)		
2	8.	James Ross	5/91-9/91,11/91	F-11/1, F-16/1	89.00	6/21/91	Amtrak NY-DC-NY		
~		Not on P/R	2/92,4/92		176.50	7/17/91	Airfare NY-BOS-NY		
		Rec'd Reimbs			213.00	8/23/91	Airfare VT-Newark		
N					700.00	3/30/92	Car Rental Portland, OR		
ŝ				/	151.72	4/13/92	Sar Rental Portland, OR		
0	9.	9. <u>Robert Dattner</u> (Candidate's Driver)	10/91-11/91 2/92,4/92-6/92	F-13/2	73.43	10/07/91	Car Repairs (Candidate) NY Paid LBF#2267		
1					67.66	6/09/92	Car Repairs NY		
		On LBF P/R					CASH ADVANCES: 9/21/91-5/13/92		
3							22 = \$3,410.00		

Page 6 of 6

SENT BY: XEROX Telecopier 7017: 7-31-96 ; 13:04 ;

Ross & Green-



erican Express vei Rateitad Sarvices Company, Inc. Inem Region Consterno Center 'American Expressway

4313518:# 2

ExhibitB

April 28, 1992

NANCY ROSS RAINBOW LOBBY 250 W. 37TH ST. NO. 317 NEW YORK NY 10107-0317

Your account number is

Dear Nancy Ross:

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You recently asked us to remove the charge(s) from your Card Account because you had paid the amount(s) directly to DAYS INN - NEW YORK.

In order to fulfill your request, please send us one of the following varifications in the enclosed return envelope:

- If you paid by check, clear copies of both the front and back of your cancelled check;
- o If you paid in cash, a copy of your receipt;
- If you paid by voucher, a copy of the cancelled voucher which can be obtained from your travel agent or tour operator;
- If you paid by any other means, a copy of the document verifying that you did so.

While waiting for this matter to be resolved, we are issuing temporary credit(s) for \$2,910.55 to your account. Unless we receive the above item from you by May 14, 1992 we will remove the temporary credit(s) and charge your account again.

We appreciate your help in resolving this situation quickly.

If you have any questions, or if we can be of further service, please call us at the telephone number on your statement.

Sincerely,

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S. Erskine Supervisor, Customer Service

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SENT BY: XEROX Telecopier 7017: 7-31-98 : 13:04 :

Ross & Green-



American Express Travel Related Services Company, Inc. Southern Region Operations Center 77 American Expressenty FL Laudendelo, FL 33337

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4313518:# 3

May 27, 1992

NANCY ROSS RAINBOW LOBBY 250 W. 57TH ST. NO. 317 NEW YORK NY 10107-0317

Your account number is

Dear Nancy Ross:

You recently inquired about an error on your statement.

We have made the necessary adjustment(s) to your Card Account. Credit(s) of \$2,910.53 are being made today.

10701 SGLB200 SGLBH19

We have therefore reversed the temporary credit(s) for \$2,910.53 and the adjustment(s) appear on your June, 1992 statement.

If you have any questions, or if we can be of further service, please call us at the telephone number on your statement.

Sincerely,

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Supervisor, Customar Servica

Corporate Dan NANCY ROS			ant Closing Dato 1-19-82
Gerd Husber	Cardualter News	Total Unryin	Total Gradits
	PREVIDUS BALANCS NANCY ROSS ADA IVONNE VAROUEZ DEBORAH GREEN JEFFREY ARON SHELLY KARLINER	\$4,125.75 @615.58 @52.36 \$718.00 \$-00 \$00 \$901.38	62, 329, 02 6.00 5.00 5.00 5.00 5.00
	TOYAL CHARGES AND CREDITS SALANCE DUE	11, 828, 91 33, 189, 44	\$2,915.CA
	2139.44 2 1082.115 point Nev.		
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IF YOU HAVE ANY QUESTIONS ABOUT YOUR ACCOUNT. CALL 1-800-492-3344 (24 HOURS 7 DAYS) OR WRITE US AT P.O. BOX 53778, PHCENIK, AZ 85072-3778.

Please see reverse alde for important intermation regarding certain types of charges.

SENT BY: XEROX Telecopier 7017; 7-31-88 ; 13:05 Ross & Green→ 4313510:# 4 t multi-set withit Protection of the second s 1 tou Departption of Monthly Activity Chargets" Dredits. CARD NUMBER PAYMENT RECEIVED - THANK YOU PAYMENT RECEIVED - THANK YOU 835311 835911 11/06 214.34 VISTA HERMOSA WASHINGTON DO INV#630280 COMPUSERVE COLUMEUS OH 229306567 COMP ACCESS 7074400536 10/17/92 COMPUSERVE COLUMEUS OH 230006426 COMP ACCESS 7074400536 10/24/92 C CRANE COMPANY FORTUNA CA 920290683 ELECTRONIC EQUIPMENT 11/06/92 COMPUSERVE COLUMBUS OH 231635261 COMP ACCESS 7074400536 11/07/92 UNITED AIRLINES WASHINGTON DC TXT# 0161489384865 10/28 892912 4 40.00 2 18.67 801307 3 14.37 501311. 4 234.97 501917 Ŧ 33.99 664317 ā 449.00 TOTAL FOR NANCY ROSS \$2,818.02 雅 CARD NUMBER CONTACT SUNLIGHT RSTR NEW YORK NY INVAOBE134 AMEXCO CREDIT CO REGISTRY 200921228 1 VR MEMBERSMIP RENEWAL 10/28/92 151312 7 17,38 501306 8 12 - 18,00 TOTAL FOR ADA IVONNE VAROURY \$82.98 \$.00 -CARD NUMBER ----ANTRAK ACH WASHINGTON DC 292044880 TKT# 2891946040632 AMTRAK ACH WASHINGTON DC 292102330 TKT# 2808871284101 DFLT4 AIRLINES ATLANTA 495294 **B** 10/18/92 88,00 498294 10 10/18/92 54.00 800303 13 15A TKT# 0062181379897 10/27 ATB.DO 405324 TRAK ACH WASHENGTON DC 323011410 TKT# 3204675109969 12 AMTRAK -11/15/92 89,00 TOTAL FOR DEBORAH GREEN \$718.00 \$.00 -CARD NUMBER Ł GA 13 AVIS RENT-A-CAR BORBANK CA R/A# 879948370 AVIS RENT-A-CAR 495315 11/08/92 TOTAL FOR JEFFREY ARON \$.00 \$588.85

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Lenora B. Fulani for President Committee and Francine Miller, as Treasurer

MUR 3969

DECLARATION OF FRANCINE MILLER

I, FRANCINE MILLER, make the following declaration under penalty of perjury:

 I am the Treasurer of Lenora B. Fulani for President (the "Committee"), respondent herein, and make this affidavit in response to FEC-initiated MUR #3969.

2. During the 1992 election cycle, I was unaware of the requirements of 11 C.F.R. 116.5(b). (When I assisted the Treasurer of Dr. Fulani's campaign in 1988, this regulation was not in effect.) I first learned of the content of the regulation when I was presented with the Audit Division's analysis at the audit exit conference in March, 1993.

3. In the spring of 1991 I applied for an American Express corporate card on behalf of the Committee. The application was denied. Having access to a credit card was critical for a multitude of necessary transactions, so individuals volunteered the use of their credit cards to provide such access. The following descriptions of such use demonstrates the ways staff and volunteers necessarily used their credit cards to charge expenses on behalf of the Committee. 4. For example, since the Committee was a political committee and had established no credit, Federal Express refused to open a Committee account unless the shipments were charged to a credit card. J. B. Opdyke made his American Express account available to the Committee for this purpose. With a few minor exceptions, all the charges on Mr. Opdyke's account were for Federal Express shipments from October 1991 through July 1992, totaling \$30,214.26. (See Exhibit A attached hereto for an example of one month's charges to Mr. Opdyke's card.)

5. For several reasons, I decided early in the campaign to maintain one checking account in New York, rather than open accounts around the country. First, it gave me greater control of spending. Second, it insured that I controlled the maintenance of the necessary documentation of expenses, and had all the information needed to file financial disclosure reports with the FEC. Our high-level staff people outside national headquarters changed locations with some frequency, given petitioning and fundraising requirements, and so to insure complete and accurate record-keeping, I did not authorize the opening of checking accounts in locations around the country.

6. I set up a national system whereby individuals would incur expenses on behalf of the Committee, and then request reimbursement from the national office (me and my staff). Staff members managing operations incurred significant expenses, since they were responsible for purchasing goods for such operations. In some cases, where I could determine beforehand that expenses were likely to be large, I would provide advances to staff.

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7. For example, Cathy Stewart was a national staff member deployed by the Committee to direct various campaign operations. She traveled to New Hampshire in the fall of 1991 to set up the Committee's operation. Between November and December, 1991, Ms. Stewart spent a significant amount of money to set up the Committee's office, recruit volunteers and do the various other activities involved in setting up a campaign operation. Yet the FEC has determined that Ms. Stewart gave \$2,837.08 in excessive contributions, all stemming from expenses associated with setting up the New Hampshire Committee office, and all of which were reimbursed, in a timely fashion.

8. David Belmont was the Ballot Access Coordinator for the Committee. As such, Mr. Belmont was ultimately responsible for getting Dr. Fulani on the ballot in each individual state. The vast majority of the charges incurred by Mr. Belmont on behalf of the Committee and charged on his American Express card -- or paid out of his pocket and then reimbursed -- are either for expenses related to travel or lodging of ballot access petitioners, are for other types of ballot access expenses, or are for expenses associated with the travel and lodging of Dr. Fulani and her aides. (See Exhibit B for an example of one month's charges appearing on Mr. Belmont's American Express statement, and one example of a reimbursement for out-of-pocket expenses).

9. Unlike most candidates, Dr. Fulani did not have a credit card. One cannot easily make an airplane or hotel reservation without using a credit card. Therefore, in order to make arrangements for Dr. Fulani's travel and lodging, her

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secretary, Jini Berman and I (or whoever was making the arrangements) used supporters' credit cards to book flights and reserve hotel rooms.

10. In February, 1992, Eleanor Fain obtained additional credit cards on her American Express account for Dr. Fulani, Cathy Stewart and me. (None of us had access to credit cards.) Most of the expenses incurred on behalf of the Committee charged to Ms. Fain's American Express were for expenses associated with work done by the three of us, i.e., travel, lodging and office-related expenses. (See Exhibit C for an example of one month's charges to Ms. Fain's account. Note that card 101 was in my name, card 103 was in Dr. Fulani's name, and card 104 was in Cathy Stewart's name.)

11. James Ross is the father of Lauren Ross. Ms. Ross was a Committee staff member who managed petitioning and fundraising drives at different locations throughout the campaign period. She used her father's credit card for travel and lodging, as well as to obtain supplies. When Mr. Ross's bill arrived each month, Ms. or Mr. Ross would request payment for all charges Ms. Ross had incurred on behalf of the Committee, and I would pay the credit card company, Chittenden Bank Visa, directly. I assumed Ms. Ross could not obtain her own credit card or she would have done so.

12. The Committee maintained significant fundraising operations in southern and northern California (based in Los Angeles and San Francisco). Staff members and volunteers would set up tables on the sidewalk and canvas door-to-door, asking people to sign a petition and give a contribution to the Committee. In the summer of 1992, this operation expanded substantially, with the hiring of students out of school for the summer. Generally, fundraisers did not own cars, and the Committee decided that the simplest method for transporting people to their fundraising locations was to rent cars. Since one cannot rent a car without a credit card, there are significant amounts of charges to individuals' credit cards relating to car rentals, particularly in California where mass transit was not very useful.

13. Lawrence Grigsby, for example, was a supporter in the Los Angeles area who used his credit card to help Committee staff in southern California rent cars, since those in the area at the time had no credit cards. The two charges the Audit Division deemed to be contributions to the Committee from Mr. Grigsby represent charges for car rentals. Such charges were paid within thirty days. The total excessive contribution attributed to Mr. Grigsby is \$1,345.25. (See Exhibit D for the charges incurred by Mr. Grigsby on behalf of the Committee.)

14. Margaret Golden was responsible for administering the Committee's fundraising operations in northern California. As is reflected on the credit card charges for which she was reimbursed, she purchased supplies, rented cars, and paid for other types of travel on behalf of the Committee. She would submit her credit card statement to me when it came in and reflected such charges, and I would generally pay the credit card company directly. If she paid by cash or check for supplies, or if she paid the credit card bills herself, she would submit a reimbursement form and I would reimburse her by check.

15. For example, campaign workers utilized Ms. Golden's telephone for telemarketing/fundraising. She submitted the bills to my office for reimbursement for campaign-related telephone calls. The Audit Division, pursuant to 116.5(b), treated this reimbursement as a contribution. If a campaign worker uses an individual's telephone for a Committee call, and thus incurs an expense on behalf of the Committee, the Committee must be allowed to reimburse the individual who allowed the use of his or her telephone for Committee business. The MUR attributes \$838.70 in "excessive contributions" to Ms. Golden. (See Exhibit E for an example of one month's charges to Ms. Golden's credit card, and an example of a reimbursement made to her for telephone expense).

16. Margaret Tanzosh was a Committee staff person who was located for most of the campaign in the Los Angeles area. She used her credit card predominantly to rent cars for the Committee's fundraising operation in southern California. Ms. Tanzosh authorized American Express to issue a card on her account to another Committee staff member, Jeff Williamson, who traveled to different locations around the country participating in various petitioning drives. Ms. Tanzosh's credit card statements, and the Audit Analysis determining the amount of excessive contributions, reflect charges both she and Mr. Williamson incurred on behalf of the Committee. The MUR attributes \$8,933.27 in excessive contributions to Ms. Tanzosh. (See Exhibit F for an example of one month's charges on Ms. Tanzosh's American Express account.)

17. Marsha Plafkin was a Committee staff person located in northern California, and used her credit cards solely to charge car rentals for the fundraising operation. My review of the designations made by the Audit Division as to whether the rental car charges on Ms. Plafkin's credit cards were for her own travel, or for another person's travel, raises the seemingly arbitrary nature of such designations.

18. For example, on Ms. Plafkin's American Express bill with a closing date of July 8, 1992, there are six rental car charges on June 12, 1992 for a total amount of \$1,387.85. (See Exhibit G.) The Audit Division classified the total amount for these charges as a contribution by Ms. Plafkin, since the Division staff member determined that the charges were for the travel or subsistence of others. In addition, there are rental car charges for \$62.29, \$167.37 and \$33.46 on June 15, 22 and 28, respectively, designated in the same manner. Finally, there are eight charges totaling \$1,540 for rental cars on June 26, 1992, which the Division classified as contributions. It is unclear how the determination was made that none of these cars were for Ms. Plafkin's own travel. The Audit Division staff member coding Ms. Plafkin's expenses treated some rental cars charged to Ms. Plafkin's credit card as for her own travel, but only until June 7, 1992. (See Exhibit H, the entries with the number "6".) After June 7, expenses for rental cars charged to Ms. Plafkin's credit card are not considered to be for her own travel; the reason for this is completely unclear. The MUR attributes \$7,556.89 in "excessive contributions" to Ms. Plafkin.

19. During the field audit, as is required by law, I was available to the auditors to answer any questions they had regarding our documentation. No one

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asked me any questions regarding whether any expenses incurred by individuals, submitted for reimbursement, were incurred on their own behalf or on behalf of others.

20. Frederick Newman was Dr. Fulani's campaign manager. Cathy Salit, the Campaign Operations Coordinator, was an authorized cardholder on Dr. Newman's American Express account. Ms. Salit was in New Hampshire for part of the campaign's primary operation, and charged hotel expenses incurred on behalf of the Committee for herself and another individual to her credit card. The Audit Staff attributed these charges to Dr. Newman, since he was the primary accountholder, and found that he gave \$930.58 in excessive contributions to the Committee. (See Exhibit I for the credit card statement containing the charge, the hotel bill that documents the charge and the Audit Analysis showing the calculation of the excess charge.)

21. Jeannine Hahn was a volunteer for the Committee who occasionally used her credit card to charge expenses incurred on behalf of the Committee. The Audit Staff, in their analysis, determined that Ms. Hahn gave \$2,343.44 to the Committee in excessive contributions. This amount stems from a charge Ms. Hahn made to her American Express account to rent a car utilized by the Committee for its operations during the New Hampshire primary. (See Exhibit J for the credit card statement containing the charge, and the Audit Analysis showing the calculation of the excess charge.)

22. Robert Levy was a Committee staff member who worked closely with the campaign manager to implement various campaign strategies. The Audit

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Staff, in their analysis, determined that Mr. Levy gave \$636.78 to the Committee in excessive campaign contributions. This amount stems from Mr. Levy's rental of a mobile phone for the campaign manager's use. Mr. Levy charged this expense to his American Express card and thus, the Audit Staff determined the charge to be a "contribution." (See Exhibit K for the credit card statement on which the charge appears, and the Audit Analysis showing the calculation of the "excessive contribution.")

23. To my knowledge, whenever a charge was incurred on behalf of the Committee by one of the cardholders on Nancy Ross's American Express account, the Committee would make a payment directly to American Express as payment of that expense. I have reviewed the affidavit of Nancy Ross submitted herewith and the credit card statements discussed therein, and concur with Ms. Ross's statements concerning the Committee's practices with respect to payments made for Committee charges to her American Express account.

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24. The Committee first learned of the analysis performed by the Audit Division at the exit conference of the audit, where I was presented with a computer run dated March 18, 1993, containing the Audit Staff's analysis. The Final Audit Report, approved April 21, 1994, also contains reference to the issue. I was not notified that an MUR was opened by the Commission on this issue. My ability to respond to this MUR is hampered, and has been prejudiced, by the time that has elapsed – at least four years – from the date of the majority of the charges being questioned. It is difficult at this late date, for example, to demonstrate that some

portion of the charges assumed by the Audit Staff to <u>not</u> be for the cardholders' own travel were <u>for</u> the cardholders' own travel -- either individuals cannot now remember, or documentary proof, such as rental car agreements, no longer exist.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief. Executed August 1, 1996.

Fanane FRANCINE MILLER

ZENORA B. FULANI FOR PRESIDENT 200 WEST 72ND STREET, SUITE 30 NEW YORK, NY 10023 _3759 1-337/264 . mencar Express AMALGAMATED BANK OF NEW YORK. 1710 Broadway, New York, N.Y. 10019 NEGOTIABLE 1003759" :026003379: 31031541" N

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Cardmember Name

Account Number

Closing Date 02-02-92

Page 1 of 1

If you have a question about your account, call 1-800-528-4800 (24 hours/7 days).

Summary of Account

\$6,690.5	Minimum Payment (8) \$60.00	Card PaymentsCredits New Care Charges New Care Statutes (A) \$2,175.10 \$3,202.25 \$8,630.52	Previous Card Batance \$5,603.37	
Credit	Charges	Listing of Charges and Credits	Amex Ref. No. Item No.	-
2,175.1		PAYMENT RECEIVED - THANK YOU 01/03	835003-0	
	9.00	FEDERAL EXPRESS NEW YORK NY 372851082 1 STANDARD LETTER 01/02/92	501005-1 001	
		FEDERAL EXPRESS NEW YORK NY	501005-1 002	
	25.50	351581803 1 OVERNIGHT LETTER 12/23/91 FEDERAL EXPRESS NEW YORK NY	501005-1 003	
	13.00	372851083 1 STANDARD PKG 1 LB 01/02/92		
1.5.5	20.50	FEDERAL EXPRESS NEW YORK NY 351581804 1 OVERNIGHT LETTER 12/23/91	501005-1 004	
		FEDERAL EXPRESS NEW YORK NY	501005-1 005	
	13.00	FEDERAL EXPRESS NEW YORK NY	501005-1 006	
1000	20.50	671547187 1 OVERNIGHT LETTER 12/23/91 FEDERAL EXPRESS NEW YORK NY	501005-1 007	
	13.00	372851076 1 STANDARD PKG 1 LB 01/02/92		
13	15.50	FEDERAL EXPRESS NEW YORK NY 372604778 1 OVERNIGHT LETTER 12/30/91	501005-1 008	
deres .		FEDERAL EXPRESS NEW YORK NY	501005-1 009	
	15.50	324534518 1 OVERNIGHT LETTER 12/31/91 FEDERAL EXPRESS NEW YORK NY	501005-1 010	
120	20.50	671547188 1 OVERNIGHT LETTER 12/23/91		
	9.00	372851077 1 STANDARD LETTER 01/02/92	501005-1 011	
	15.50	FEDERAL EXPRESS NEW YORK NY 671547190 1 OVERNIGHT LETTER 12/23/91	501005-1 012	
		FEDERAL EXPRESS NEW YORK NY	501005-1 013	
	9.00	295527390 1 STANDARD LETTER 12/30/91 FEDERAL EXPRESS NEW YORK NY	501005-1 014	
	9.00	372851164 1 STANDARD LETTER 12/26/91	00.000-1014	
2,175.1	208.50	PAGE TOTAL		

Payments or credits received after closing date above will appear on next month's statement.

FEBRUARY IS CRUISE VACATION MONTH. DON'T MISS THE BOAT. CALL 1-800-YES AMEX OR YOUR TRAVEL AGENT NOW!



Please see reverse side for important information,

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		MCES	J B OPDYCKE	1		and the second second		10
	Amex Rel. No.	Item No.	Listing of Charges and Credits				Charges	1
-	501005-1	015	FEDERAL EXPRESS NEW YORK 874084705 1 OVERNIGHT LETTER			NY 12/30/91	13.00	
	501005-1	016	FEDERAL EXPRESS NEW YORK			NY		
	501005-1	017	351925915 1 STANDARD PKG FEDERAL EXPRESS NEW YORK		LB	12/30/91 NY	13.00	
	501005-1	018	323629016 1 STANDARD PKG FEDERAL EXPRESS NEW YORK	1	LB	12/30/91 NY	13.00	
	501005-1	019	351925946 1 OVERNIGHT LETTER FEDERAL EXPRESS NEW YORK			01/02/92 NY	13.00	
	501005-1	020	372851080 1 STANDARD LETTER FEDERAL EXPRESS NEW YORK			01/02/92 NY	9.00	
	501005-1	021	372851071 1 STANDARD LETTER FEDERAL EXPRESS NEW YORK			12/28/91 NY	26.50	1
	501005-1	022	372851081 1 STANDARD LETTER FEDERAL EXPRESS NEW YORK			01/02/92 NY	9.00	,
	501005-1	023	372851072 1 STANDARD PKG FEDERAL EXPRESS NEW YORK	1	LB	01/02/92 NY	13.00	,
	501005-1	024	323628752 1 COURIER PAK FEDERAL EXPRESS NEW YORK			12/30/91 NY	27.25	
	501005-1	025	372851073 1 OVERNIGHT LETTER FEDERAL EXPRESS NEW YORK			01/02/92 NY	13.00	
	501005-1	026	007008503 1 COURIER PAK FEDERAL EXPRESS NEW YORK			12/30/91 NY	32.75	5
	501005-1	027	671547184 1 OVERNIGHT LETTER FEDERAL EXPRESS NEW YORK			12/23/91 NY	20.50	
	501005-1	028	323629014 1 COURIER PAK FEDERAL EXPRESS NEW YORK			12/31/91 NY	21.75	5
	501005-1	029	351925944 1 OVERNIGHT LETTER FEDERAL EXPRESS NEW YORK			01/02/92 NY	13.00	
	501005-1	030	372604775 1 OVERNIGHT LETTER FEDERAL EXPRESS NEW YORK			12/30/91 NY	15.50	
	501005-1	030	351925945 1 STANDARD PKG FEDERAL EXPRESS NEW YORK	1	LB	01/02/92 NY	13.00	
	501005-1	032	319626716 1 OVERNIGHT LETTER FEDERAL EXPRESS NEW YORK			12/30/91 NY	13.00	
	501005-1	033		2	LB	12/31/91 NY	16.50	
	501005-1	034	350500766 1 COURIER PAK FEDERAL EXPRESS NEW YORK			12/31/91 NY	21.75	
	501005-1	035	372851078 1 STANDARD PKG	2	LB	01/02/92	14.00	
			372851079 1 STANDARD PKG	2	LB	01/02/92	14.00	
	501005-1	036	283775038 1 OVERNIGHT LETTER			12/30/91	18.00	
	501005-1	037	FEDERAL EXPRESS NEW YORK 351581809 1 OVERNIGHT LETTER			12/23/91	20.50	
	501008-1	038	FEDERAL EXPRESS NEW YORK 372604777 1 STANDARD PKG	2	LB	01/03/92	16.50	
	501008-1	039	FEDERAL EXPRESS NEW YORK 372851174 1 STANDARD AIR 1	0	LB		19.50	
	501008-1	040	FEDERAL EXPRESS NEW YORK 372851165 1 STANDARD AIR 1	0	LB		19.50	
	501010-1	041	FEDERAL EXPRESS NEW YORK 352213254 1 OVERNIGHT LETTER			01/06/92	13.00	
	501010-1	042	FEDERAL EXPRESS NEW YORK 296002815 1 COURIER PAK			NY 01/06/92	20.00	
	501010-1	043	FEDERAL EXPRESS NEW YORK 381613919 1 STANDARD LETTER			01/06/92	9.00	
	501010-1	044	FEDERAL EXPRESS NEW YORK 311728267 1 STANDARD LETTER			NY 01/06/92	9.00	
	501010-1	045	FEDERAL EXPRESS NEW YORK 341544954 1 OVERNIGHT LETTER			NY 12/30/91	13.00	
	501010-1	046	FEDERAL EXPRESS NEW YORK 351925914 1 STANDARD PKG	1	LB	NY 01/06/92	13.00	
	501010-1	047	FEDERAL EXPRESS NEW YORK 352338282 1 COURIER PAK			NY 01/06/92	25.00	
	501010-1	048	FEDERAL EXPRESS NEW YORK 313304296 1 STANDARD PKG	1	LB	NY 01/06/92	13.00	
	501010-1	049		2	LB	NY 01/04/92	14.00	
	501010-1	050	FEDERAL EXPRESS NEW YORK 372851086 1 STANDARD LETTER			NY 01/04/92	9.00	
	501010-1	051	FEDERAL EXPRESS NEW YORK 372851087 1 STANDARD PKG	2	LB	NY 01/06/92	14.00	
	501010-1	052	FEDERAL EXPRESS NEW YORK 372851085 1 STANDARD LETTER			NY 01/04/92	9.00	
	501010-1	053	FEDERAL EXPRESS NEW YORK 089210509 1 COURIER PAK			NY 01/06/92	21.75	
	501010-1	054	FEDERAL EXPRESS NEW YORK 323693638 1 OVERNIGHT LETTER			NY 12/31/91	13.00	
		Asia da						1.1.2.2

PAGE TOTAL

Cardmember Name

J B OPDYCKE

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Closing Date Page 2 of 32 CBA008

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J B OPDYCKE

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Account Number Clo

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a An American Expres			
Amex Ref. No.	Item No	Listing of Charges and Credits	Charges
501010-1	055	FEDERAL EXPRESS NEW YORK NY 311471518 1 COURIER PAK 01/06/92	20.00
501010-1	056	FEDERAL EXPRESS NEW YORK NY 379590749 1 COURIER PAK 12/31/91	20.00
501010-1	057	FEDERAL EXPRESS NEW YORK NY 341750263 1 OVERNIGHT LETTER 01/06/92	15.50
501010-1	058	FEDERAL EXPRESS NEW YORK NY 050333120 1 COURIER PAK 01/07/92	43.75
501010-1	059	FEDERAL EXPRESS NEW YORK NY 342293868 1 STANDARD LETTER 01/06/92	9.00
501010-1	060	FEDERAL EXPRESS NEW YORK NY 372604768 1 STANDARD PKG 1 LB 01/06/92	15.50
501010-1	061	FEDERAL EXPRESS NEW YORK NY 326268764 1 COURIER PAK 12/02/91	20.00
501010-1	062	FEDERAL EXPRESS NEW YORK NY 372604785 1 STANDARD LETTER 01/06/92	11.50
501010-1	063	FEDERAL EXPRESS NEW YORK NY 283775037 1 OVERNIGHT LETTER 01/06/92	20.50
501012-1	064	FEDERAL EXPRESS NEW YORK NY 993169192 1 STANDARD LETTER 01/08/92	11.50
501012-1	065	FEDERAL EXPRESS NEW YORK NY 323275682 1 COURIER PAK 01/07/92	30.00
501015-1	066	FEDERAL EXPRESS NEW YORK NY 372851107 1 OVERNIGHT LETTER 01/09/92	13.00
501015-1	067	FEDERAL EXPRESS NEW YORK NY 372851104 1 COURIER PAK 01/09/92	21.75
501015-1	068	FEDERAL EXPRESS NEW YORK NY 372851111 1 OVERNIGHT LETTER 01/09/92	13.00
501015-1	069	FEDERAL EXPRESS NEW YORK NY 372851098 1 COURIER PAK 01/09/92	21.75
501015-1	070	FEDERAL EXPRESS NEW YORK NY 323629017 1 COURIER PAK 12/23/91	32.75
501016-1	071	FEDERAL EXPRESS NEW YORK NY 372851074 1 STANDARD PKG 1 LB 01/09/92	13.00
501016-1	072	FEDERAL EXPRESS NEW YORK NY 372604767 1 STANDARD PKG 3 LB 01/06/92	15.00
501016-1	073	FEDERAL EXPRESS NEW YORK NY 372851097 1 STANDARD LETTER 01/09/92	9.00
501016-1	074	FEDERAL EXPRESS NEW YORK NY 372851099 1 STANDARD AIR 2 LB 01/09/92	11.50
501016-1	075	FEDERAL EXPRESS NEW YORK NY 372851090 1 STANDARD PKG 6 LB 01/09/92	18.75
501016-1	076	FEDERAL EXPRESS NEW YORK NY 372851091 1 STANDARD PKG 3 LB 01/09/92	15.00
501016-1	077	FEDERAL EXPRESS NEW YORK NY 372851092 1 STANDARD PKG 2 LB 01/09/92	16.50
501016-1	078	FEDERAL EXPRESS NEW YORK NY 372851094 1 STANDARD AIR 2 LB 01/09/92	11.50
501016-1	079	FEDERAL EXPRESS NEW YORK NY 372851110 1 STANDARD PKG 2 LB 01/09/92	14.00
501016-1	080	FEDERAL EXPRESS NEW YORK NY 372851095 1 STANDARD PKG 2 LB 01/09/92	14.00
501016-1	081	FEDERAL EXPRESS NEW YORK NY 372851114 1 STANDARD AIR 4 LB 01/10/92	13.50
501016-1	082	FEDERAL EXPRESS NEW YORK NY 372851096 1 STANDARD PKG 4 LB 01/09/92	16.00
501016-1	083	FEDERAL EXPRESS NEW YORK NY 372851115 1 STANDARD LETTER 01/11/92	9.00
501016-1	084	FEDERAL EXPRESS NEW YORK NY 372604781 1 STANDARD LETTER 01/09/92	11.50
501016-1	085	FEDERAL EXPRESS NEW YORK NY 352212462 1 OVERNIGHT LETTER 01/13/92	18.00
501016-1	086	FEDERAL EXPRESS NEW YORK NY 372851112 1 STANDARD PKG 2 LB 01/09/92	14.00
501016-1	087	FEDERAL EXPRESS NEW YORK NY 372851089 1 COURIER PAK 01/08/92	20.00
501016-1	088	FEDERAL EXPRESS NEW YORK NY 351925913 1 STANDARD LETTER 01/10/92	9.00
501016-1	089	FEDERAL EXPRESS NEW YORK NY	13.50
501016-1	090	FEDERAL EXPRESS NEW YORK NY	14.00
501016-1	091	FEDERAL EXPRESS NEW YORK NY	24.50
501016-1	092	FEDERAL EXPRESS NEW YORK NY	
501016-1	093	372851105 1 STANDARD PKG 3 LB 01/09/92 FEDERAL EXPRESS NEW YORK NY	15.00
501017-1	094	372851103 1 STANDARD PKG 2 LB 01/09/92 FEDERAL EXPRESS NEW YORK NY	14.00
	States?	297173562 1 OVERNIGHT LETTER 01/13/92	15.50

PAGE TOTAL

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IRAVEL RELATED SERVICES

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Account Number

Closing Date Page 4 of 32 CBA008 02-02-92 13

Credits

-	e An Adaption Express		Allowed the second statement of the	STATUTE DESCRIPTION OF TAXABLE PARTY.		-
	Amax Ref. No.	Item No	Listing of Charges and Credits		Charges	
	501017-1	095	FEDERAL EXPRESS NEW YORK	NY	15 50	
	501017-1	096	341750262 1 OVERNIGHT LETTER FEDERAL EXPRESS NEW YORK	01/13/92 NY	15.50	
	501017-1	097	708635173 1 COURIER PAK FEDERAL EXPRESS NEW YORK	01/13/92 NY	21.75	
	501017-1	098	295527391 1 STANDARD LETTER FEDERAL EXPRESS NEW YORK	01/13/92 NY	11.50	
	501017-1	099	394780711 1 STANDARD LETTER FEDERAL EXPRESS NEW YORK	01/14/92 NY	9.00	
	501017-1	100	351925948 1 OVERNIGHT LETTER FEDERAL EXPRESS NEW YORK	01/13/92 NY	13.00	
	501017-1	101	295527389 1 STANDARD LETTER FEDERAL EXPRESS NEW YORK	01/06/92 NY	9.00	
	501017-1	102	305537865 1 COURIER PAK FEDERAL EXPRESS NEW YORK	01/14/92 NY	32.50	
	501017-1	103	311471517 1 COURIER PAK FEDERAL EXPRESS NEW YORK	01/13/92 NY	20.00	
	501017-1	104	283775036 1 OVERNIGHT LETTER FEDERAL EXPRESS NEW YORK	01/13/92 NY	13.00	
	501018-1	105	351925949 1 STANDARD PKG 1 FEDERAL EXPRESS NEW YORK	LB 01/13/92 NY	13.00	
	501018-1	106	341750261 1 OVERNIGHT LETTER FEDERAL EXPRESS NEW YORK	01/14/92 NY	15.50	
	501018-1	107	379622701 1 COURIER PAK FEDERAL EXPRESS NEW YORK	01/14/92 NY	21.75	
	501018-1	108	372851101 1 COURIER PAK FEDERAL EXPRESS NEW YORK	01/09/92 NY	21.75	
	501018-1	109	372851108 1 OVERNIGHT LETTER FEDERAL EXPRESS NEW YORK	01/09/92 NY	13.00	
	501018-1	110		LB 01/15/92	16.50	
	501018-1	111		LB 01/15/92	16.50	
	501018-1	112	350488001 1 COURIER PAK FEDERAL EXPRESS NEW YORK	01/15/92 NY	22.50	
	501018-1	113	372604784 1 OVERNIGHT LETTER FEDERAL EXPRESS NEW YORK	01/08/92 NY	20.50	
	501018-1	114		LB 01/14/92	18.00	
	501018-1	115	372851116 1 OVERNIGHT LETTER FEDERAL EXPRESS NEW YORK	01/15/92 NY	13.00	
	501018-1	116	991819486 1 OVERNIGHT LETTER FEDERAL EXPRESS NEW YORK	01/14/92 NY	13.00	
	501019-1	117		LB 01/14/92	14.00	
	501019-1	118		LB 01/16/92	14.00	
	501019-1	119	372851153 1 COURIER PAK FEDERAL EXPRESS NEW YORK	01/16/92 NY	20.00	
	501019-1	120		B 01/16/92	14.00	
	501019-1	121		B 01/16/92	14.00	
	501019-1	122	311364839 1 COURIER PAK FEDERAL EXPRESS NEW YORK	01/14/92 NY	20.00	
	501019-1	123	372851150 1 STANDARD LETTER FEDERAL EXPRESS NEW YORK	01/16/92 NY	9.00	
	501019-1	123	372851121 1 COURIER PAK FEDERAL EXPRESS NEW YORK	01/16/92 NY	21.75	
			351326133 1 STANDARD PKG 4 L	B 01/16/92	16.00	
	501019-1	125	FEDERAL EXPRESS NEW YORK 372851122 1 STANDARD PKG 2 L FEDERAL EXPRESS NEW YORK	LB 01/16/92	14.00	
	501019-1		372851118 1 STANDARD PKG 6 1	B 01/16/92	18.75	
	501019-1	127	FEDERAL EXPRESS NEW YORK 323275680 1 COURIER PAK	01/14/92	27.25	
	501019-1	128	FEDERAL EXPRESS NEW YORK 372851119 1 COURIER PAK	01/16/92	20.00	
	501019-1	129	FEDERAL EXPRESS NEW YORK 372851117 1 STANDARD LETTER	01/16/92	9.00	
	501019-1	130		B 01/16/92	15.00	
	501019-1	131		B 01/16/92	14.00	
	501019-1	132		B 01/16/92	14.00	
	501019-1	133	FEDERAL EXPRESS NEW YORK 372851157 1 STANDARD LETTER	01/16/92	9.00	
	501022-1	134	FEDERAL EXPRESS NEW YORK 372851172 1 STANDARD AIR 1 L	B 01/16/92	10.50	
-				PAGE TOTAL	644.50	
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of 32 CBA0080	Closing Date Page 02-02-92 K3	Account Number	Cardmember Name J B OPDYCKE	IRAN EL RELATED SERVICES	
Cradits	Charges		Listing of Charges and Credits	Amex Ref. No. Item No.	
	14.00	NY 01/16/92	FEDERAL EXPRESS NEW YORK 372851123 1 STANDARD LETTER	501022-1 135	-
		01/16/92 NY	FEDERAL EXPRESS NEW YORK	501023-1 136	
	9.00	01/20/92 NY	295527392 1 STANDARD LETTER FEDERAL EXPRESS NEW YORK	501023-1 137	
	21.75	01/20/92 NY	355105334 1 COURIER PAK FEDERAL EXPRESS NEW YORK	501023-1 138	
	25.50	01/17/92 NY	372851124 1 OVERNIGHT LETTER FEDERAL EXPRESS NEW YORK	501023-1 139	
	9.00	01/20/92 NY	381613917 1 STANDARD LETTER FEDERAL EXPRESS NEW YORK	501023-1 140	
	13.00	01/18/92 NY	372851127 1 OVERNIGHT LETTER FEDERAL EXPRESS NEW YORK	501023-1 141	
	9.00	01/18/92 NY	372851128 1 STANDARD LETTER FEDERAL EXPRESS NEW YORK	501023-1 142	
	24.50	01/13/92 NY	351925947 1 COURIER PAK FEDERAL EXPRESS NEW YORK	501023-1 142	
	13.00	01/18/92 NY	372851140 1 OVERNIGHT LETTER		
	13.00	01/20/92	341750260 1 OVERNIGHT LETTER	501023-1 144	
	9.00	01/20/92	FEDERAL EXPRESS NEW YORK 351326131 1 STANDARD LETTER	501023-1 145	
	9.00	01/18/92	FEDERAL EXPRESS NEW YORK 372851141 1 STANDARD LETTER	501023-1 146	
	20.00	01/20/92	FEDERAL EXPRESS NEW YORK 311471516 1 COURIER PAK	501023-1 147	
	13.00	1 LB 01/20/92	FEDERAL EXPRESS NEW YORK 108198567 1 STANDARD PKG	501024-1 148	
	16.00	4 LB 01/21/92	FEDERAL EXPRESS NEW YORK 296002814 1 STANDARD PKG	501024-1 149	
	9.00	NY 01/20/92	FEDERAL EXPRESS NEW YORK 311728266 1 STANDARD LETTER	501024-1 150	
	13.00	NY 01/21/92	FEDERAL EXPRESS NEW YORK 372851130 1 OVERNIGHT LETTER	501024-1 151	
	16.00	4 LB 01/21/92	FEDERAL EXPRESS NEW YORK	501024-1 152	
	13.00	NY 01/14/92	FEDERAL EXPRESS NEW YORK 351925950 1 OVERNIGHT LETTER	501024-1 153	
	13.00	NY 01/21/92	FEDERAL EXPRESS NEW YORK 372851129 1 OVERNIGHT LETTER	'501024-1 154	
	13.00	NY 1 LB 01/20/92	FEDERAL EXPRESS NEW YORK	501024-1 155	
	13.00	NY	283775035 1 STANDARD PKG FEDERAL EXPRESS NEW YORK	501024-1 156	
		01/21/92 NY	992862818 1 OVERNIGHT LETTER FEDERAL EXPRESS NEW YORK	501026-1 157	
	9.00	01/21/92 NY	290736747 1 STANDARD LETTER FEDERAL EXPRESS NEW YORK	501026-1 158	
	13.00	01/20/92 NY	353412069 1 OVERNIGHT LETTER FEDERAL EXPRESS NEW YORK	501026-1 159	
	27.00	01/22/92 NY	372604780 1 COURIER PAK FEDERAL EXPRESS NEW YORK	501026-1 160	
	13.00	1 LB 01/16/92 NY	372851155 1 STANDARD PKG FEDERAL EXPRESS NEW YORK	501026-1 161	
	9.00	01/16/92 NY	372851120 1 STANDARD LETTER FEDERAL EXPRESS NEW YORK	501026-1 162	
	9.00	01/22/92 NY	340635798 1 STANDARD LETTER FEDERAL EXPRESS NEW YORK	501026-1 163	
	32.75	01/21/92 NY	348863515 1 COURIER PAK FEDERAL EXPRESS NEW YORK	501026-1 164	
	32.75	01/23/92 NY	351326130 1 COURIER PAK FEDERAL EXPRESS NEW YORK	501026-1 165	
	24.50	01/23/92	351326128 1 COURIER PAK FEDERAL EXPRESS NEW YORK	501029-1 166	
	13.00	01/24/92 NY	305427953 1 OVERNIGHT LETTER		
	32.50	01/24/92	351326127 1 COURIER PAK	501029-1 167	
	13.00	01/17/92	FEDERAL EXPRESS NEW YORK 350500770 1 OVERNIGHT LETTER	501029-1 168	
	21.75	01/28/92	FEDERAL EXPRESS NEW YORK 305709124 1 COURIER PAK	501031-1 169	
	11.50	NY 01/23/92	FEDERAL EXPRESS NEW YORK 372851147 1 STANDARD LETTER	501031-1 170	
	15.50	1 LB 01/23/92	FEDERAL EXPRESS NEW YORK 372851148 1 STANDARD PKG	501031-1 171	
	22.50	NY 01/23/92	FEDERAL EXPRESS NEW YORK 372604769 1 COURIER PAK	501031-1 172	
	15.50	1 LB 01/23/92	FEDERAL EXPRESS NEW YORK	501031-1 173	
	27.00	3 LB 01/27/92	FEDERAL EXPRESS NEW YORK	501031-1 174	
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.00	651.00	PAGE TOTAL		CONTRACTOR OF THE OWNER OF THE OWNER	

5010 5010	Ref. No.	Item No	Listing of Charges and Credits		Charges [13 Sec. 19 Sec
5010	031-1				Charges	Credite
		175	FEDERAL EXPRESS NEW YORK 379493942 1 STANDARD PKG	2 LB 01/21/92	14.00	
5010	031-1	176	FEDERAL EXPRESS NEW YORK	NY 01/23/92	22.50	Sec. 1
	031-1	177	372851125 1 COURIER PAK FEDERAL EXPRESS NEW YORK	NY	16.50	
5010	31-1	178	FEDERAL EXPRESS NEW YORK	2 LB 01/23/92 NY		
5010	031-1	179	FEDERAL EXPRESS NEW YORK	1 LB 01/23/92 NY	15.50	
5010	31-1	180	FEDERAL EXPRESS NEW YORK	1 LB 01/23/92 NY	20.50	
5010	031-1	181	372851145 1 STANDARD PKG FEDERAL EXPRESS NEW YORK	1 LB 01/23/92 NY	15.50	
5010	31-1	182	298338626 1 STANDARD LETTER FEDERAL EXPRESS NEW YORK	01/21/92 NY	11.50	
	031-1	183		2 LB 01/23/92	16.50	
	31-1	184		1 LB 01/23/92	15.50	
	2.05.0		372851133 1 COURIER PAK	01/23/92	27.50	
	031-1	185		5 LB 01/23/92	19.50	
	31-1	186	FEDERAL EXPRESS NEW YORK 372851134 1 STANDARD LETTER	01/23/92	11.50	
5010	31-1	187	FEDERAL EXPRESS NEW YORK 372851143 1 STANDARD PKG	3 LB 01/23/92	17.50	
5010	31-1	188	FEDERAL EXPRESS NEW YORK 372851135 1 STANDARD PKG	1 LB 01/23/92	15.50	
5010	031-1	189	FEDERAL EXPRESS NEW YORK 351326126 1 OVERNIGHT LETTER		13.00	
5010	31-1	190	FEDERAL EXPRESS NEW YORK 341750258 1 OVERNIGHT LETTER	NY	15.50	
5010	33-1	191	FEDERAL EXPRESS NEW YORK 993169185 1 OVERNIGHT LETTER	NY 01/29/92	13.00	
5010	033-1	192	FEDERAL EXPRESS NEW YORK	1 LB 01/27/92	13.00	
5010	033-1	193	FEDERAL EXPRESS NEW YORK	NY	20.00	
5010	33-1	194	354827959 1 COURIER PAK FEDERAL EXPRESS NEW YORK	01/20/92 NY		
5010	033-1	195	283775034 1 STANDARD PKG FEDERAL EXPRESS NEW YORK	NY	16.50	
5010	33-1	196	311728271 1 STANDARD LETTER FEDERAL EXPRESS NEW YORK	NY	9.00	
5010	33-1	197	313856383 1 STANDARD LETTER FEDERAL EXPRESS NEW YORK	01/27/92 NY	9.00	
	33-1	198	290736745 1 STANDARD LETTER FEDERAL EXPRESS NEW YORK	01/28/92 NY	9.00	
	33-1	199	323621417 1 COURIER PAK FEDERAL EXPRESS NEW YORK	01/28/92 NY	27.25	
0010			911341447 1 OVERNIGHT LETTER	01/29/92	13.00	
				PAGE TOTAL	397.75	.0
				ACCOUNT TOTAL	\$3,202.25	\$2,175.1

Stateme		and the second		Vei®Acco	UNT IS PAST D	UE		No:	
Creditor: Al	0.00			URION BANK	New	Charges	Closing C FINANCE CHARGE		New Balance
	.047	Constraint, and a		.00		.00	16.00	1000	1,063.62
Reference Number	No.	Posting Date	Descrip	tion of Transactio				Charges	Credits
lalance(s) to Wh Rate Applies	Fina	Average Daily Bala		odule Dally Periodic Rate	ANNUAL PERCENTAGE RATE	Minimum Pa Past Due Amount	yment includes This Month's Paymen		ue Date: 02-27-9
	100 C				A COLUMN TWO IS NOT		30.00	- Minimiam	

Amendment to Minimum Payment Terms
Important Sign & Travel Account Information
Prior to January 1, 1990, the Sign & Travel Account Agreement (the "Agreement") required a Minimum Payment of 1/24th of the New Balance of your Sign & Travel
Account, but not less than \$20 or the entire New Balance II less than \$20. Alter January 1, 1990, the Agreement is amended to require a Minimum payment of 1/36th of
the New Balance, but not less than \$20 or the entire New Balance II less than \$20. If you wish, you can always pay more than the Minimum Payment.
Finance Charge
To calculate the Finance Charge, we multiply the Daily Pariodic Rate by the Average Daily Balance during the billing period. Then we multiply the product by the
Travel Charges and accrued and unpaid Finance Charges (except such Finance Charges will not be included for residents of CO. IA, ME, NC and PR), and subfract any
payments or credits. Then we add up the daily balance for the billing period. Then we add up the daily balance for the billing period. Then we subt the Average Daily Balance results in compound interest (except for residents of CO. IA, ME, NC and PR), and subfract any
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ReLATED SERVICES	J B OPDYCKE	Account Number	Closing Date Page 9 of 38 02-02-92 w3
ITEM 015 FEDERAL EXPRESS NEW YORK	\$13.00 NY	TEM 018 FEDERAL EXPRESS NEW YO	13.00 SRK NY
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1 OVERNIGHT LETTER		1 STANDARD PKG	1.10
FULANT FOR PRES	94103 10019	FULANI FOR PRESIDEN	1 03101
NEW YORK NY CUSTOMER SERVICE	10013	NEW YORX CUSTOMER SERV	NY
ROC NUMBER 8740847054		ROC NUMBER 35192591	
S/E # 4413508471	10744	S/E # 4416508471	TOTAL
	SHANDER \$13.00	Chief Here.	CHANGE AMOLINY \$13
17EW 017	\$13.00	ITEM 018	\$13.00
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5/E # 4416508471		S/E # 4416508471	
	TOTAL DUARE \$13.00	are a selectoperi	101AL Dualide 0.1.0
	ANDAT \$13.00		ANGUNT \$13
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Server Estatisticant and Landian	92 372851080	Service Establishmett and Letation	12/28/91 372851071
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1 STANDARD LETTER FULANI, LENGRA B, FOR PRESIDENT	101020217	1 STANDARD LETTER	PRESIDENT 101070317
	46204	CAROL 1N	27701 NY
MC BARTON NEW YORK NY		CUSTOMER SERV	
		CUSTOMER SERV	
NEW YORK NY		ROC NUMBER 37285107	
NEW YORK NY CUSTOMER SERVICE		ROC NUMBER 37285107	
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NEW YORK NY CUSTOMER SERVICE ROC NUMBER 37285 10800 S/E # 4416508471	TOTAL GRANDE AMOLINT \$9.00	ROC NUMBER 37285107	15 10TN #0.0
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BEAUTRAVEL	B OPDYCKE	Account Number	Closing Date Page 10 of 32 02-02-92 #3
LTEW 023	\$27.25	ITEM 024 FEDERAL EXPRESS NEW Y	\$13.00
FEDERAL EXPRESS NEW YORK NY Caremanister Accelum Ne Detts of Charge	Retarenze Carle Approval Core	FEDERAL EXPRESS NEW Y	Bate of Charge And
12/30/91	323828752	Contractor of the local division of the loca	01/02/92 372851073
FEDERAL EXPRESS NEW YORK NY		Service Establishmans and Location FEDERAL EXPRESS NEW	YDRX NY
Receive of Change		Receits of Charge	
1 COURTER PAK LBFFP 1035 90021	9	1 OVERNIGHT LETTER FULANI, LENDRA B, FO	R PRESIDENT 101070317
LENORA B FULANI FOR PRESIDENT 10015	9	BETSY PUDEY NEW YORK	02124
CUSTOMER SERVICE		CUSTOMER SER	VICE
ROC NUMBER 3236287526		ROC NUMBER 3728510	730
S/E # 4416508471		S/E # 4416508471	TOTAL
DhANIE AMOUNT	\$27.25		CHANDE AMOUNT \$13
TEM 025 FEDERAL EXPRESS NEW YORK NY	\$32.75	ITEM 026 FEDERAL EXPRESS NEW YO	\$20.50
Cardina Cardina (Cardina Cardina Cardi	Networke Cade Approval Cade 007008503	Cardmamber Asseum No	Date of Diarge Americana Colo An 12/23/91 571547184
			16/ 63/ 81 0/ 1047 184
FEDERAL EXPRESS NEW YORK NY			YORK NY
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1 COURTER PAK		I OVERNIGHT LETTER	
LENORA B FULANT FOR PRES 94110			PRESIDENT 101070317 01853
LENGRA B FULANI FOR PRES 10023 NEW YORK NY		NEW YORK	NY
CUSTOMER SERVICE		CUSTOMER SERV	
ROC NUMBER 0070085035		RCC NUMBER 67154718	540
5/5 / 4416508471		S/E # 4416508471	
107AL DAADE	#00 TF		
AHDAT	\$32.75		AMOUNT \$20
the second s			
TEM 027 FEDERAL EXPRESS NEW YORK NY	\$21.75	ITEM 028 FEDERAL EXPRESS NEW YO	\$13.00
California (Charge 12/31/91	Selectors Code Ageneval Cose 323829014	Garding and Account No.	Date of Charge Automate Sade Age 01/02/92 351925944
Service Establishment and Location		Service Establishment and Location	
FEDERAL EXPRESS NEW YORK NY			YORK NY
		and a cargo	
1 COURTER PAK		1 OVERNIGHT LETTER	
LBF 90029 LENURA B FULANI FOR PRESIDENT 10019		FULANI FOR PRESIDEN DEMOCRATIC PARTY OF	
NEW YORK NY CUSTOMER SERVICE		NEW YORK CUSTOMER SERV	NY
RCC NUMBER 3236290142		ROC NUMBER 35192594	
S/E # 4416508471		S/E # 4418508471	
TOTAL DHAME	\$21.75		TOTAL DAAKS \$13
ANEQUART			
	J	L	
TEM 029 FEDERAL EXPRESS NEW YORK NY	\$15.50	ITEM 030 FEDERAL EXPRESS NEW YO	\$13.00 RK NY
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Serves Esighi-semant and Lacgian		Service Establishment and Lenature	
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		1 STANDARD PKG	1 LB
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1 OVERNIGHT LETTER FULANI LENDRA 8, FOR PRESIDENT 10107		FULANT FOR PRESIDEN	
1 OVERNIGHT LETTER FULANI, LENGRA 8, FOR PRESIDENT 10107 NETER BROKS 31038 NEW YORK NY		FULANI FOR PRESIDEN I P L I NEW YORK	10019 NY
1 OVERNIGHT LETTER FULANI LENDRA 8, FOR PRESIDENT 10107 NETER BROOKS 31038		FULANI FOR PRESIDEN	10019 NY
1 OVERNIGHT LETTER FULANI, LENGRA 8, FOR PRESIDENT 10107 NETER BROKS 31038 NEW YORK NY		FULANI FOR PRESIDEN I P L I NEW YORK	10019 NY ICE
1 OVERNIGHT LETTER FULANI LENDRA 8, FOR PRESIDENT 10107 NETER BROOKS 31038 NEW YORK NY OUSTOMER SERVICE ROC NUMBER 3726047754		FULANI FOR PRESIDEN I P L 1 NEW YORK CUSTOMER SERV ROC NUMBER 35192594	10019 NY ICE
1 OVERNIGHT LETTER FULANI LENGRA 8,FOR PRESIDENT 10107 NETER BROOKS 31036 NEW YORK NY CUSTOMER SERVICE		FULANI FOR PRESIDEN I P L I NEW YORK CUSTOMER SERV	10019 NY ICE

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TEM 031	ITEN 032 FEDERAL EXPRESS NEW 1	and the second
Caramamber Asteudi No Derix of Diargo Nebrones Com 12/30/91 319828716 Earris Establishment and Lensrow FEDERAL EXPRESS NEW YORK NY Record of Charge	Agersest Colle Cardinamper Access in Service Establiquiment and Letablie FEDERAL EXPRESS NER Revent of Charge	Dese of Charge Antoines Cure 12/31/91 372604778 1 YORK NY
1 OVERNIGHT LETTER FULANI, LENDRA 8, FOR PRESIDENT 101070317 HOLD FOR PICX-UP 03101 NEW YORK NY CUSTOMER SERVICE	MARK M COVE NEW YORK CUSTOMER SEA	R PRESIDENT 101070317 03801 NY VICE
ROC NUMBER 3196267163 S/E # 4416508471	ROC NUMBER 3726047 S/E # 4416508471	
TOTAL DAAMS AMOUNT \$1	3.00	TOTAL DIAADE AHOUAT \$1
TEN 033 \$21.75 TEDERAL EXPRESS NEW YORK NY		ORK NY S14.00
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FEDERAL EXPRESS NEW YORK NY	Ancore of Decyp	YORK NY
1 COURTER PAK FULANI, LENDRA B, FOR PRESIDENT 101070317 ARISTOTLE INDUSTRIES 20003 NEW YORK NY CUSTOMER SERVICE	1 STANDARD PKG PULANI, LENDRA B, FO REGENT FOREX 1035 NEW YORK CUSTOMER SER	R PRESIDENT 101070317 90029 NY
ROC NUMBER 3505007660	ROC NUMBER 3728510	785
S/E # 4416508471	S/E # 4416508471	TOTAL DUARCE AMOUNT \$14
TEM 035 \$14.00 EDERAL EXPRESS NEW YORK NY	ITEM 038 FEDERAL EXPRESS NEW 1	0RX NY \$18.00
Darter of Charge Reformance Code 01/02/92 372551079	Approved Date	Desit of Disrige Automatic Cost 4 12/30/91 283775038
FEDERAL EXPRESS NEW YORK NY		YORK NY
1 STANDARD PKG 2 LB FULANI, LENGRA 8, FOR PRESIDENT 101070317 JOYCE DATTNER 94117 NEW YORK NY	1 OVERNIGHT LETTER MARIET HOFFMAN OREATIVE EXDWARE NEW YORK	96112 10019 NY
CLSTOMER SERVICE ROC NUMBER 3728510796	CUSTOMER SER	
S/E # 4418508471	4.00	TOTAL CHARGE \$18
TEM 037 \$20.50 EDERAL EXPRESS NEW YORK NY	ITEN 038 FEDERAL EXPRESS NEW YO	818.50 JRK NY
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FEDERAL EXPRESS NEW YORK NY	Razura ai Ciarga	YORK NY
1 OVERNIGHT LETTER PULANI, LENORA 8, FOR PRESIDENT 101070317 EDMUND G BROWN JR 94115 NEW YORK NY CUSTOMER SERVICE	I STANDARD PKG PULANI, LENGRA B, FOR JIM HORTON NEW YORK CUSTOMER SERV	PRESIDENT 101070317 21201 NY
ROC NUMBER 3515818095	ROC NUMBER 37280477	76
S/E # 4416508471	S/E / 4418508471	70744 Center \$16

RELATED JE	B OPDYCKE	-O	Closing Date Page 12 bit 32 C
TEM 039	\$19.50	ITEM 040	\$19.50
FEDERAL EXPRESS NEW YORK NY	References Ceale Approval Cente	FEDERAL EXPRESS NEW	YORK NY Date of Darge Reference Gees Appro-
01/02/92	372851174	CHARLES CONTRACTOR	01/02/92 372051165
FEDERAL EXPRESS NEW YORK NY		Service Existint many and Lacation FEDERAL EXPRESS NE	W YORK NY
RELEMAL CAPRESS NEW TURK NT		Rectified Date	
			10.18
I STANDARD AIR 10 LB FULANI.LENDRA B.FOR PRESIDENT 101070			OR PRESIDENT 101070317
JANINE CARPENTER 97203		LAUREL HEIGHTS HO	ISPITAL 30306 NY
CUSTOMER SERVICE		CUSTOMER SE	RVICE
ROC NUMBER 3728511743		RCC NUMBER 372851	1651
5/5 A 410504131		100 A 101000000	
S/E # 4416508471		S/E # 4416508471	TOTAL
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TEM 04.1 FEDERAL EXPRESS NEW YORK NY	\$13.00	ITEM 042 FEDERAL EXPRESS NEW	YORK NY B20.00
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	OUEE IGEG4		01/08/92 296002815
FEDERAL EXPRESS NEW YORK NY			W YORK NY
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1 OVERNIGHT LETTER	C.S. BRIDE	T COURTER PAK	
FULANI, LENORA B, FOR PRESIDENT 101070 LENORA B FALANI FOR PRESIDENT 10019		LBF 92 LBF '92	90027 10019
NEW YORK NY		NEW YORK	NY
CUSTOMER SERVICE		CUSTOMER SE	
ROC NUMBER 3522132541		ROC NUMBER 296002	0153
S/E # 4416508471		S/E # 4416508471	
TOTAL	\$13.00		TOTAL Charge \$20
AMOUNT	\$15.00		амодят \$20.
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TEM 043 FEDERAL EXPRESS NEW YORK NY	\$9.00	TEN Q44 FEDERAL EXPRESS NEW	YORK NY \$9.00
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1 STANDARD LETTER		1 STANDARD LETTER	
JANINE CARPENTER 97203 FULANI FOR PRESIDENT 10019		NAP CREATIVE EXCHANGE	35205
NEW YORK NY		NEW YORK CUSTOMER SE	NY
CUSTOMER SERVICE			
ROC NUMBER 3816139191		ROC NUMBER 311728	2014
S/E # 4416508471		S/E # 4416508471	
107AL DAAGE	\$9.00		107AL \$9.1
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Rears of Charge		1.07100100.010	1.18
		I STANDARD PKG	
1 OVERNIGHT LETTER FULANI LENDRA 8, FOR PRESIDENT 101070	0317	FULAN1 FOR PRESIDE	
1 OVERNIGHT LETTER FULANI, LENDRA B, FOR PRESIDENT 101070 BURLINGTON CITY HALL 05401			ENT 10019
1 DVERNIGHT LETTER FULANI, LENDRA 8, FOR PRESIDENT 101070		FULAN1 FOR PRESIDE FULAN1 FOR PRESIDE	ENT 10019 NY
I OVERNIGHT LETTER FULANI, LENGRA B, FOR PRESIDENT 101070 BURLINGTON CITY HALL 05401 NEW YORK NY		FULANI FOR PRESIDE FULANI FOR PRESIDE NEW YORK	ENT 10019 NY RV ICE
I OVERNIGHT LETTER FULANI, LENORA 8, FOR PRESIDENT 101070 BURLINGTON CITY HALL 05401 NEW YORK NY CUSTOMER SERVICE		FULANI FOR PRESIDI FULANI FOR PRESIDI NEW YORK CUSTOMER SEP ROC NUMBER 3519251	ENT 10019 NY RV ICE
I DVERNIGHT LETTER FULANI, LENORA 8, FOR PRESIDENT 101070 BURLINGTON CITY HALL 05401 NEW YORK NY CUSTOMER SERVICE		FULANI FOR PRESIDI FULANI FOR PRESIDI NEW YORK CUSTOMER SEP	ENT 10019 NY RV ICE

RELATED J B OPDYCKE	Account Number Closing Date Page 13 of 32
17EM 047 \$25.00	17EM 048 \$13.00
FEDERAL EXPRESS NEW YURK NY Caremoniser Assault by Easter of Daries Reference Cease Assault Code	FEDERAL EXPRESS NEW YORK NY Construment Answer Ma. Date at Diverse Relationus Exerc. An
01/06/92 352336282	01/06/92 313304296
FEDERAL EXPRESS NEW YORK NY	FEDERAL EXPRESS NEW YORK NY
Record of Charge	Annual of Dania
1 COURTER PAK	1 STANDARD PKG 1 LB
FULANI, LENDRA B, FOR PRESIDENT 101070317 LENDRA B FULANI FOR PRESIDENT 10023	BETSI PENDRY C2124 LENDRA B FULANI FOR PRESIDENT 10019
NEW YORK NY CUSTOWER SERVICE	NEW YORK NY CUSTOMER SERVICE
ROC NUMBER 3523382822	ROC NUMBER 3133042984
S/E # 4416508471	S/E # 4418508471
10744 DIAMBA AMDURT \$25.00	TOTAL EMARGE AMOUNT \$13
	\$13
TEM 049 \$14.00 FEDERAL EXPRESS NEW YORK NY	ITEM 050 \$9.00 FEDERAL EXPRESS NEW YORK NY
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FEDERAL EXPRESS NEW YORK NY	FEDERAL EXPRESS NEW YORK NY
1 STANDARD PKG 2 UB PULANI, LENORA B, FOR PRESIDENT 101070317	1 STANDARD LETTER FULANI, LENDRA B, FOR PRESIDENT 101070317
REGENT FOREX 1035 90029	LOIS TROUNSTEIN/LINDA CORNS 77002 NEW YORK NY
CUSTOMER SERVICE	NEW YORK NY CUSTOMER SERVICE
ROC NUMBER 3728510844	ROC MUNBER 3728510886
S/E # 4416508471	5/5 / 4418508471
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DUARCH \$14.00	DUANU \$9
ITEM 051 \$14.00 FEDERAL EXPRESS NEW YORK NY Baterman East Approver Cave 01/06/92 372651087	TEM 052 FEDERAL EXPRESS NEW YORK NY \$9.00
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FEDERAL EXPRESS NEW YORK NY	FEDERAL EXPRESS NEW YORK NY
1 STANDARD PKS 2 LB FULANI, LENORA B, FOR PRESIDENT 101070317	1 STANDARD LETTER FULANI, LENORA B, FOR PRESIDENT 101070817
KITTY REESE 94117	
NEW YORK NY	APRIL BUTCHER/DAVID CHERRY 46204
NEW YORK NY CUSTOMER SERVICE	
NEW YORK NY	NEW YORK NY
NEW YORK NY CUSTOMER SERVICE ROC NUMBER 3728510870	NEW YORK NY CUSTOMER SERVICE ROC NUMBER 3728510855
NEW YORK NY CUSTOMER SERVICE ROC NUMBER 3728510870 S/E * 4418508471 TSTAL TSTAL STAL STAL STAL STAL STAL ST	NEW YORK NY CUSTOMER SERVICE. ROC NUMBER 3728510855 S/E # 4418508471 707AL DAMAGE \$9.
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ITEM 095 FEDERAL EXPRESS NEW YORK	\$15.50 NY	ITEM 096 \$21.75 FEDERAL EXPRESS NEW YORK NY
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FULANI FOR PRESIDENT CT CAMPAI LENORA & FULANI FOR PRESIDENT		FULANI, LENDRA B, FOR PRESIDENT 101070317 L B FALANIFA FOR PRESIDENT 317 10019
NEW YORK NY CUSTOMER SERVICE		NEW YORK NY
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Closing Data Page 20 of 32 CBA008 Cardmember Name Account Number IRAVEL RELATED SERVICES J & OPDYCKE 02-02-92 163 29 ITEM 103 \$13.00 ITEM 104 \$13.00 FEDERAL EXPRESS NEW YORK NY FEDERAL EXPRESS NEW YORK NY Date of Charge Reference. Davide Approval Com ter Assessed The Bate of Charge Card arones Lass Approval Case 01/13/92 283775036 01/13/92 35 1925949 FEDERAL EXPRESS NEW YORK NY FEDERAL EXPRESS NEW YORK NY Resource of Charges Rectord of Charge I OVERNIGHT LETTER 1 STANDARD PKG 1 LB HARRIET HOFFMAN CREATIVE EXCHANGE 98112 B PEELER 03101 10017 10019 NEW YORK NEW YORK NY CUSTOMER SERVICE CUSTOMER SERVICE ROC NUMBER 2837750386 ROC NUMBER 3519259494 S/E / 4416508471 S/E # 4416508471 TOTAL CHANGE TOTAL CHARGE AMOUN \$13.00 \$13.00 \$15.50 11EM 105 ITEM 108 \$21.75 FEDERAL EXPRESS NEW YORK N FEDERAL EXPRESS NEW YORK Adatuvel Cold 01/14/92 341750281 mer Au count fee Date of Charge 01/14/92 379622701 Post Cade Service Establishment and Local Service Lotan FEDERAL EXPRESS FEDERAL EXPRESS NEW YORK NY NEW YORK 347 Record of Charge Assant of Charge 1 OVERNIGHT LETTER FULANI FOR PRES CONN CAMPAIGN 06120 LENDRA & FULANI FOR PRESIDENT 10107 1 COURSER PAK LBF FOR PRESIDENT 95073 10019 NEW YORK 10 NEW YORK CUSTOMER SERVICE CUSTOMER SERVICE ROC NUMBER 3417502616 ROC NUMBER 3796227013 S/E # 4416508471 S/E # 4416508471 \$15.50 \$21.75 **ITEM 107** \$21.75 ITEM 108 \$13.00 FEDERAL EXPRESS NEW YORK NY FEDERAL EXPRESS NEW YORK NY Approval Cade 01/09/92 372851108 01/09/92 372851101 Care Approval Cards Service Establishment and Loca Service Establ mant and La FEDERAL EXPRESS NEW YORK FEDERAL EXPRESS NY NEW YORK NY Recard at Diarge 1 COURSER PAK 1 OVERNIGHT LETTER FULANI, LENORA 8, FOR PRESIDENT 101070317 LB FULANI FOR PRESIDENT 93105 FULANI, LENDRA B, FOR PRESIDENT 101070317 JIM HORTON 19132 NEW YORK NEW YORK MY CUSTOMER SERVICE CUSTOMER SERVICE RCC NUMBER 3728511010 ROC NUMBER 3728511080 S/E # 4418508471 S/E # 4416508471 \$21.75 TOTAL DUARDE \$13.00 ITEM 109 \$15.50 17EM 110 \$16.50 FEDERAL EXPRESS NEW YORK NY FEDERAL EXPRESS NEW YORK NY Caramember Account las 01/15/92 657908217 Car. Date of Charge 01/15/92 657906218 preval Ca . . Approval Cade Service Establishment and Co. Service Estaplishment and LA FEDERAL EXPRESS FEDERAL EXPRESS NEW YORK NY NEW YORK NY Ancard of Charge 1 STANDARD PKG 2 L8 FULANI, LENDRA 8, FOR PRESIDENT 101070317 LENDRA FULANI FOR PRES 92637 I STANDARD PKG 2 L8 FULANI LENGRA 8, FOR PRESIDENT 101070317 L8F FOR PRESIDENT 76 95073 NEW YORK NEW YORK NY CUSTOMER SERVICE CUSTOMER SERVICE ROC NUMBER 6579062173 ROC NUMBER 6579062184 S/E # 4416508471 S/E # 4418508471 \$16.50 \$16.50

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1 COURTER PAK	1 OVERNIGHT LETTER
FULANI, LENDRA B, FOR PRESIDENT 101070317 WILLIAM SMITH COLLEGE W103 14456	FULANI, LENORA B, FOR PRESIDENT 101070317 SANDRA KELLY 12747
NEW YORK NY CUSTOMER SERVICE	NEW YORK NY CUSTOMER SERVICE
ROC NUMBER 3504880013	ROC NUMBER 3726047846
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1TEM 113 \$18.00	ITEM 114 \$13.00
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Assess at Charge	Nervie al Diarge
1 STANDARD PKG 1 LB	1 OVERNIGHT LETTER
LENDRA 8 FULANI FOR PRES 93105 LENDRA 8 FULANI FOR PRES 10107	FULANI, LENORA B, FOR PRESIDENT 101070317 NEW ENGLAND TELEPHONE 02107
NEW YORK NY CUSTOMER SERVICE	NEW TORK NY CUSTOMER SERVICE
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1TEN 117 \$14.00	ITEM 118 \$20.00
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FULANI, LENORA B, FOR PRESIDENT 10023 LBF FOR PRES 92037 NEW YORK NY	FULANI, LENDRA B, FOR PRESIDENT 10023 APRIL BUTCHER 46208 NEW YORK NY
FULANT, LENDRA B, FOR PRESIDENT 10023 LBF FOR PRES 92037	FULANI, LENORA B, FOR PRESIDENT 10023 APRIL BUTCHER 46208

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IRAVEL RELATED SERVICES	J B OPDYCKE	Account Number Closing Date Page 22 of 32 (02-02-92 R)
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LBF FOR PRESIDENT NEW YORK NY	93105	LINDA CORTIS 77002 NEW YORK NY
CUSTOMER SERVICE		CUSTOMER SERVICE
ROC NUMBER 3728511581		ROC NUMBER 3728511091
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	AMOUNT \$14.00	AMOLAT \$14
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NEW YORK NY CUSTOMER SERVICE		NEW YORK NY CUSTOWER SERVICE
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NEW YORK NY CUSTOMER SERVICE		NEW YORK NY CUSTOWER SERVICE
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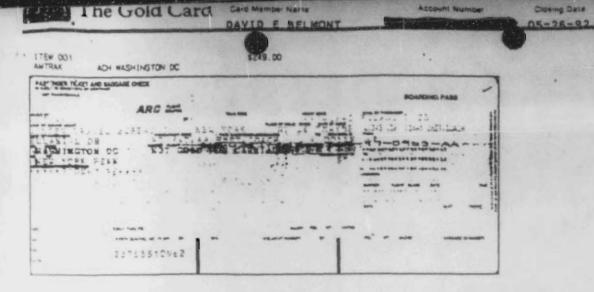
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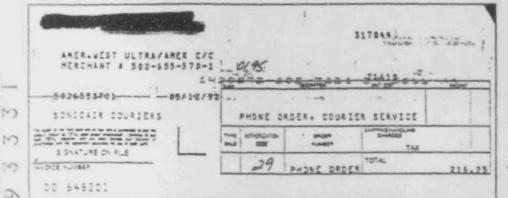
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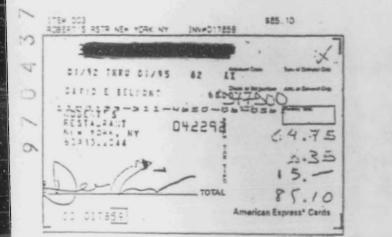
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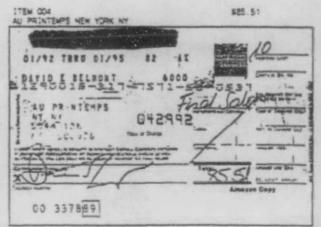




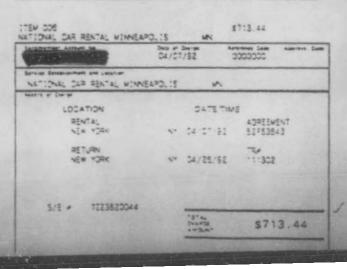








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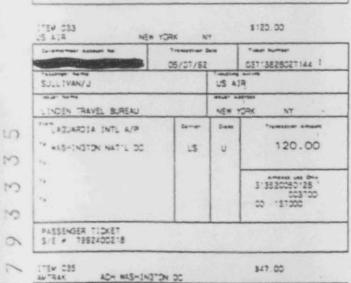
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PRIVILEGES UPDATE



ENTERTAINMENT

Gold Card Events: "JVC Jazz Festival"

DATE: June 19 - 27. 1992 PLACE: New York City

Mooid Cardmembers can catch the biggest names in jazz at the 1992 JVC Jazz Restivul, Various performances at Carnegie Hall & Avery Fisher Hall, Mail tor betails

For information please call 800-448-TIKS

Subject to availability

connect

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PRIVILEGES UPDATE

LONG DISTANCE CONNECTIONS Use The Card to call with Sprint!

She Card One Bill Use The Card as a calling card through Sprint, and receive up to 15 minutes of free long distance each month for six months! "Sali 800-765-1058 for betails

PRIVILEGES UPDATE

E BB010002



ENTERTAINMENT

Gold Card Events: "Guys & Dolls"

DATE TBO PLACE: Martin Beck Theatre

Gold Cardmembers can get tickets for New York's new sensation, the long awaited return of one of Broadway's best loved musicals, "Guys & Dolls",

For information please call 800-448-7IKS

Subject to availability

PRIVILEGES UPDATE



TRAVEL American Express is your guide to

fabulous destinations across the U.S.!

Cardmembers can call now to order "American Express Explores," a complimentary guide to travel destinations across the U.S. For a free copy, call Privileges On Call(sm) at 800-825-5000, extension 3742. Supplies are limited, so call today?

Allow 4 to 6 weeks for belivery

PRIVILEGES UPDATE

ATLAKA NN LH

PRIVILEGES ON CALL

Take advantage of hundreds of special offers with Privileges on Call(sm).

13 an American Express R. Caromember savings on travel, shopping and thing are as ticse as the nearest telephone. Just call 800-835-5000, arter your Card number for identification, and let the savings begint



MEMBERSHIP MILES

PRIVILEGES UPDATE

Earn valuable miles with the

American Express Ri Card!

Enroll in the Membership Miles smillprogram and you can earn miles by charging with The Card. You can redeem miles into 5 airline frequent fiver programs or use for vacation packages and more Call for more details 800-343-0330 \$25 annual program fee waived for first year of enrollment.

3 ANI FOR PRESIDENT 8800 10023 ORK. N 10/21 92 1-337/260 1712.44 ad swin hundred we love + 4/2 NUS. ALGANATED BANK OF NEW YORK NOT NEGOTABLE AME BARROUNDO "006800" /:026003379: 31031541" ~ 0 3

DAVED BELMONT 10. FR: CESAR CAPABES RE: WIRED HONEY / EXPENSES TOTAL & WIRED VER MESTERN UNCON \$ 550.00 - 220.00 CAR RENTALS: \$22/91 - 8/29/92 - 298.62 8/29/92 - 917 192 BAL- 31.38 \$ 12.59 GAS RECEEPTS : 8.00 6.00 5.01 31.59

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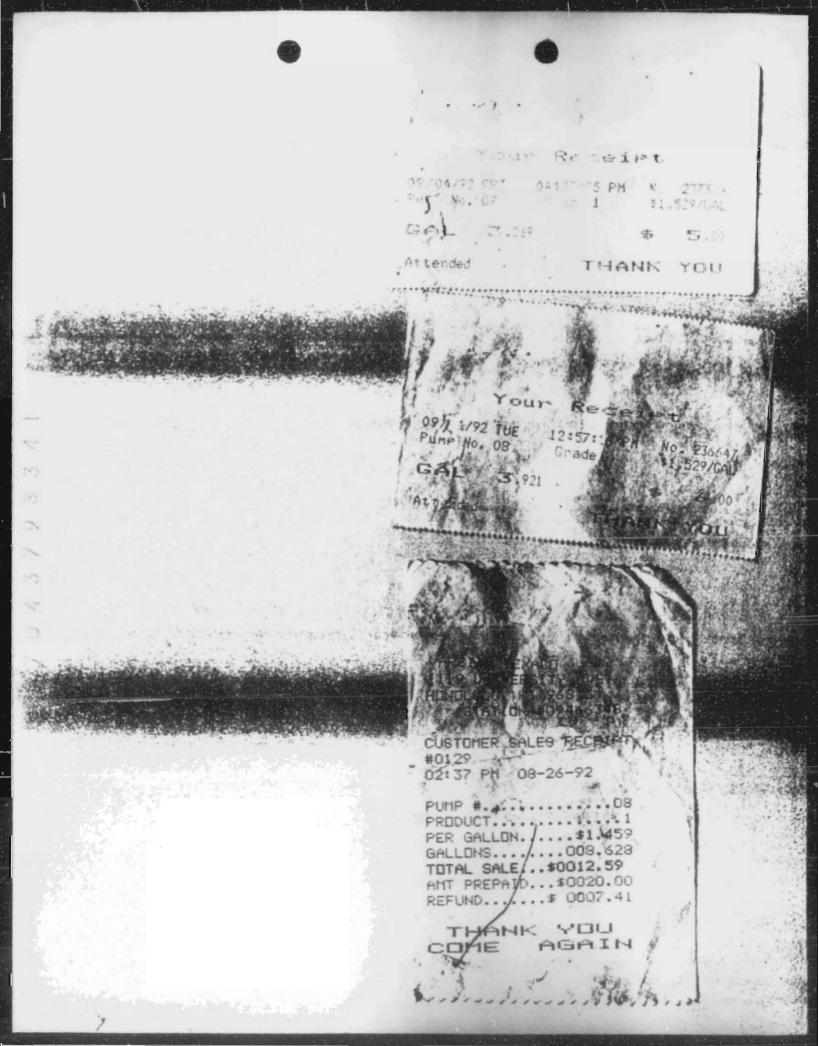
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DORESS D BIRTH DATE	MILES IN	Damage Waiver (CDW)	76.	62
INIVER'S LICENSE NO. STATE DATE EXPIRES	INFORTANT THIS VENICLE MAY NOT DE USED OR ORIVEN BY ANYONE UNDER THE AGE	Damages		
ULL PROTECTION: By initialing, Renter agrees to pay PER DAY, or	OF 25. IF DRIVER IS NOT ON CONTRACT, ALL INSUMANCE IS VID.	SUB TOTAL	266	60
action thereof additional and VIP agrees to waive all claims against Renter or damage to vehicle, subject, however, to the terms of paragraph 5 on	1	Tax	8.	62
* mis agreement and provided it is operated or used in	OEPOSITS CC	ENKE		
EMERGENON	FRAT	Thickory	14.	61
CARS SHOULD BE RETURNED DURING	ROP	Traffic Violations		
IN AN FRAME		TOTAL CHARGE	220	60
IN AN EMERGENCY ONLY, YOU MAY PARK CAR IN H STREET OR ANY GARAGE ON THIS STREET (BEAC 1) YOU MUST PAY PARKING F RECEIPT TO KEY PARKING F	UNS ONLY!	Less Deposit	-	20-
1) YOU MUST PAY REET (BEAC	H WALK	Net Due V.LP.	CAS	514
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 VIP CAR RENTAL DURING OPE TO BE SURE WE FOUND THE CAP 4) THERE WILL BE A \$50.00 CHARG FOUND PARKED ON LOT. 	E IF CAR IS			-
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DRIVING ON UNPAVED ROADS PROHIBITED AND VOIDS CDW. KEY LEFT IN CAR VOIDS CDW.	This coverage will automatic any no fault law which may be	cally conform to the ba	sic requirem	ents of
• BY SIGNING THIS RENTAL AGREEMENT, RENTER AUTHORIZES VIP TO PROCESS A CREDIT CARD VOUCHER FOR ANY	Rentor waives all other option I have read the above and and	al coverage under no fau	R provisions.	
CHARGES INCURRED. CUSTOMER IS LIABLE FOR PARKING AND TRAFFIC	×a	C		
VIOLATIONS.	Antes			

See."

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WED. 10/7/92

TO: FRAN MILLER

FR: DAVID BELMONT

RE: WESTERN UNION MONEY TRANSFER TO KENTUCKY

Please find attached to this memo a receipt for money that I wired to Robert Conroy as re-imbursement for a \$500 check that he wrote to the Secretary of State of Kentucky on August 27, 1992 as payment of the filing fee for Lenora B. Fulani to gain access to the ballot in that state.

tentucky Fil	ing Fee
요즘은 그는 것은 물건을 다 가지 않는 것이 없는 것이 많이 많이 하는 것이 없다.	WESTERN UNION TRANSFER The fastest way to send money
Dollar amount Fire Hundred In words Fire Hundred Pay to Robert Contoil Matimum Sander's name Doug' Belmont	Do nal Pyrtes in shaded area WCY 2440 BRO DITON Operator DR BROADWAY FIN number BAN WAY 100 Bent time and date
Sender's telephone (area code) 212 number 7822 Sender's address 5/023FP 200 60 722	100 Bent time and date 20010 + +30 Money Transfer control number CEVENI RELIDED
Additional services available at additional cost. Check services dealered:	Amount 300-
I want Western Union to telephone the recipient. (area code) number	Charge and I
i want a check delivered to the following address:	HAD HACSY BH S: 10
Test question Who's running for Buss Limit 4 words Question President? Answer Le	nor B Fulan rocitived 540 -
Use test question ONLY If recipient has no LD. documents. Special requirer Customer's signature	Agent's signature
THE TERMS AND CONDITIONS ON WHICH THE BERVICE IS PROVIDED ARE SET O	

30 226 ROBERT E. CONROY 211 E. PATTERSON 447-1968 COLUMBUS, OH 43202 816 1-527 10 92 25-64/440 Kentucky State Trassier \$ 500.00 Pay Porter of Five hundred dollars und 200 DODDORODO. Society Bank National Association Columbus, Ohio Clintonville Office 6-90-484 Robert & Cringy TRAND Fulani

001 40 1 200 WEST 72ND STR 000 BANK OF NEW YORK 129.11 ek, N.Y. 10019 NEWHYORK, 'NY 1002 1Del 529.00 1:84 600 3 3.7 Th 329.00 LANI FOR PRESIDE 59.00 178.00 EET, SU 795.00 uned (any that + " 10.85 5 TE 30 108.30 163.90 275.3 1 3 3 10 3 7 2 1 1 m 277 . 11 30 202 . 5 5 241.3 121.20 ~ 145.12 M 50.01 5 XX 361.93 403.02 0 + 149.78 -186 . 27 4.12 4 · 12 103 · BLE 155 -10243.1 118 - --4901 1-337/280 127 - 32 15 . . (173 -15 -023

The Gold Card' Summar of Account

TOUSE TELEVISION FOR THE POINT TO FOUR THE

Card Namber Name ELEANOR FAIN

If you have a question about your account, call 1-800-327-2177 (24 hours/7 days). FOR FAST BALANCE AND PAYMENT INFORMATION, CALL OUR AUTOMATED SERVICE AT 1-800-292-AMEX USING A TOUCH TONE PHONE. PLEASE HAVE YOUR ACCOUNT NUMBER READY

Account Nump

Closing Date

04-24-92

Previous Batance \$11,585.12	Credits/P	ayments 364.9	12	New Charger \$12,4		New Balance \$12,200.82
Ames: Ref. No. Item No	Listing of Charges and Credits				Charges	Credits
835108-0	PAYMENT RECEIVED -	THANK	TRANSACT I YOU	0NS 04/17		10,097.92
663092-1	TRANS WORLD AIRLINE	5		1275		
501108-1 001	# 01524185119759 COMPUSERVE 210527387 COMP ACCES	COLU		0H 04/11/92	76.48	721.00
			TOTAL FOR	CARD 100	76.48	10.818.92
663094-1 663094-1 663094-1 663102-1	NORTHWEST AIRLINES # 01213769282199 NORTHWEST AIRLINES # 01213769282219 NORTHWEST AIRLINES # 01213769282239 NORTHWEST AIRLINES # 01275018471059					329.00 329.00 329.00 59.00
149097-1 002	CHELSEA RACQUET CLUE	3 INC	NEW YORK	NY	29.75	
663092-1 003	CONTINENTAL AIRLINES TKT# 0058553229577		YORK	NY 03/12	629.00	7
663092-1 004	NORTHWEST AIRLINES TKT# 0121376928219	NEW	YORK	NY 03/11	1.627.00	Cartal 1
663092-1 005	NORTHWEST AIRLINES TKT# 0121376928221	NEW	YORK	NY 03/11	1.627.00	Strepund
663092-1 006	NORTHWEST AIRLINES TKT# 0121376928223	NEW	YORK	NY 03/11	1,627.00	
663094-1 007	ALASKA AIRLINES TKT# 0278553229595	NEW	YORK	NY 03/27	460.00	
			P	AGE TOTAL	6,076.23	11.864.92

Payments or credits received after closing date above will appear on next month's statement.

Did you know you can get cash from over 47,000 ATM'S around the world? Call 1-800-CASH-NOW and sign up for Express Cash today.

Please see reverse side for important information regarding certain types of charges

2 of 7 FBB0130 3431	Closing Date Page	Account Number	Gard Member Name	The C	
Credits	Charges		Listing of Charges and Credits	Item No.	Amer Rel. No.
			AMTRAK ACH WASHINGTON DC	008	_ 495098-1
	178.00	04/01/92 NY	096031440 TKT# 0926905026718 CONTINENTAL AIRLINES NEW YORK	009	663101-1
	626.00	03/30 NY	TKT# 0058553229600 FOOT LOCKER NEW YORK	010	501103-1
	75.76	04/11/92	082451322 ATHLETIC FOOTWEAR	1	
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		ACTIONS	CARD TRANSACT	011	053111-1
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	10.85	MA	INV#380109	012	130114-1
	108.30	03/22/92	SHERATON BOSTON HOTEBOSTON 430594380 LODGING	013	501085-1
	163.90	03/22/92	SHERATON BOSTON HOTEBOSTON 430594380 LODGING	014	501085-1
	276.36	03/26/92	HYATT REGENCY WASHINWASHINGTON 001600490 LODGING	015	501088-1
	277.70	03/26/92	HYATT REGENCY WASHINWASHINGTON 001600480 LODGING	016	501088-1
	202.64	04/15/92	HOLIDAY INN PHILADELPHIA 04154722 LODGING	017	499107-1
	241.31	04/15/92	HOLIDAY INN PHILADELPHIA 04154723 LODGING	018	499107-1
	121.90	04/16/92	HOLIDAY INN PHILADELPHIA 04164150 LODGING	019	499108-1
	145.72	PHIA PA 04/16/92	HOLIDAY INN PHILADELPHIA 04164151 LODGING	020	499108-1
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	361.93		HYATT PITTSBURGH PITTSBURGH	022	501108-1
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	186.27	04/16/92 IL	237839 LODGING GTE AIRFONE, OAK BROOK	026	501109-1
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	4.12	2100 04/15/92 0H	021624541 TO TEL NO. 212-799-210 HYATT ON CAPITOL SQUCOLUMBUS	028	501112-1
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			CARD TRANSACT	000	000000
	469.75		DAYS INN OF BUFFALO CHEEKTOWAGA INV#522444	030	926087-1
	118.47		GOLDEN TYPEWRITER & NEW YORK NY INV#512168	031	019099-1
	127.42	HO ITA	OMNI NETHERLAND PLAZA CINCINNATI INV#579852	032	130114-1
	15.00	EE 03/26/92	AMEXCO CREDIT CD REGISTRY PMC920326 1 YEAR MEMBERSHIP FEE	033	501088-1
	173.44		HOLIDAY INN PHILADELPHIA 04164182 LODGING	034	499108-1
	503.04		HYATT PITTSBURGH PITTSBURGH 001900100 LODGING	035	501109-1
	45.00		US AIR COLUMBUS	036	600111-1
	310.35	OH	TKT# 0372156838155 HYATT ON CAPITOL SOUCOLUMBUS	037	501113-1
		04/20/92	001200040 LODGING		
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.00	6,404.39	PAGE TOTAL			
\$11,864.92	\$12,480.62	ACCOUNT TOTAL	ACC		

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Cardinamiar Account Ha	1/mmailten 03/12/92		Total Number 00585532295774
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LINDEN TRAVEL BUREAU	NEW YORK NY		
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* LAGUARDIA INTL A/P	00	Y	
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lanuer Rome			B*955	
LINDEN TRAVEL BUREAU		NEW Y	ORK NY	
LAGUARDIA INTL A/P	Carrier	Ciess	Transition Amount	
" MINNEAPOLIS WN	140	Y	1,627.00	
* AUSTIN TX	NW	Y		
" HOUSTON TX		vo	309210006151	
DETROIT WI-WAYNE CO	NIT	BN	003700	

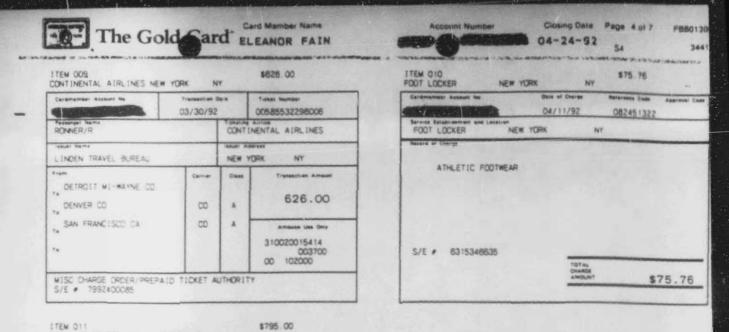
ITEM 007 ALASKA AIRLINES NE	EW YORK	NY	2480.00		
eramemaer secourt les Trassaction : 03/27/92			T-case Number 02785532295951		
CARPATHIOS/C			ALASKA ATALINES		
LINDEN TRAVEL BUREAU		NEW 1			
PORTLAND OR	Carrie	Class	Transaction Amount		
* SAN FRANCISCO CA	AS	Y	460.00		
10		a con	309320045053		
**	- 23		00 095000		

Account Number	Closing Date	Page 3 of 7	F880130
Cumera		54	344
ITEM 002 OHELSEA RACQUET CLUB IN	C NEW YORK NY	\$29 75	
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01/92 THRU 01/95	89 11 mm	net Lans	esthe
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LALLSLA RACQUET	032892j		
6316502354	ł		
Barrine Prile	TOTAL	29.	75
00 671579	Am	erican Express* C	

Caramamar Account No	Data	Tister Number 01213769282191		
Fasterger Name FULANI/L	NORTHMEST AIRLINES			
INDEN TRAVEL BUREAU			NEW YORK NY	
LAGUARDIA INTL A/P	Center	Cipes	Transsilion Amount	
" WINNEAPOLIS MN	NW	×	1.627.00	
" AUSTIN TX	NR	Y .		
" HOUSTON TX	vo	309210006150		
* DETROIT WI-WAYNE CO	NIR	BN	00 094000	

Cardmoniser Account No.	03/11/92		Tuenet Humaer 01213769282235
SULLIVAN/J		Trenation	MEST AIRLINES
LINDEN TRAVEL BUREAU		NEW Y	
LAGUARDIA INTL A/P	Carrier	Chaps	Transaction Amount
" WINNEAPOLIS MN	NW	4	1.627.00
AUSTIN TX	NW	Y .	
" HOUSTON TX		vo	309210006152
" DETROIT MI-WAYNE CO	NH	BN	003700

AMTRAK AD	H WASHINGTO	Bass of Onk-up	Raferson Char	Approval Coun
CONTRACTOR OF THE OWNER		04/01/92	096031440	
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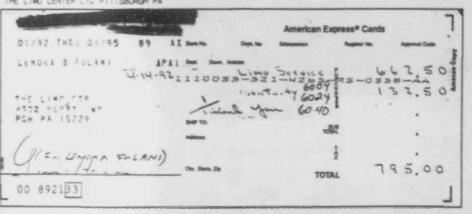
ITEM DIS

SHERATON BOSTON HOTEBOSTON

S/E # 4080100944

de.

THE LIND CENTER LTD PITTSBURGH PA





Date of Charge 03/22/92

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AX.

TOTAL CHARGE

MA

\$11.54

SHERATON BOSTON HOTEBOST Recover of Disarge	TON MA	
ABRIVAL DATE DEPARTURE 03/21/92 03/22/ ROC NUMBER 00596	E DATE # OF NIGHT /92 01	
S/E # 2200102812	Tat 60.1 Potas Deadd Ambuert	\$108.3
ITEM 015 HYATT REGENCY WASHINWASHIN		1276.36
Carementari Azzault Na	Date of Dearge As 03/26/92 (001600490
Service Extended and Localian	INGTON OC	
and the second		
National In Charles		
ARRIVAL DATE DEPARTURE 03/24/92 03/25/ ROC NUMBER 368532		

Date of Dairy

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S/E # 2200102812

ITEM 014

Caremander Asses

Rectory of Charge

SHERATON BOSTON HOTEBOSTON

SHERATON BOSTON HOTEBOSTON

ARRIVAL DATE DEPARTURE DATE # OF NIGHTS 03/21/92 03/22/92 01 ROC NUMBER 08595

Service Setablianment and Local

\$163.90

\$163.90

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OTAL MARCIN \$276.36

\$108.30

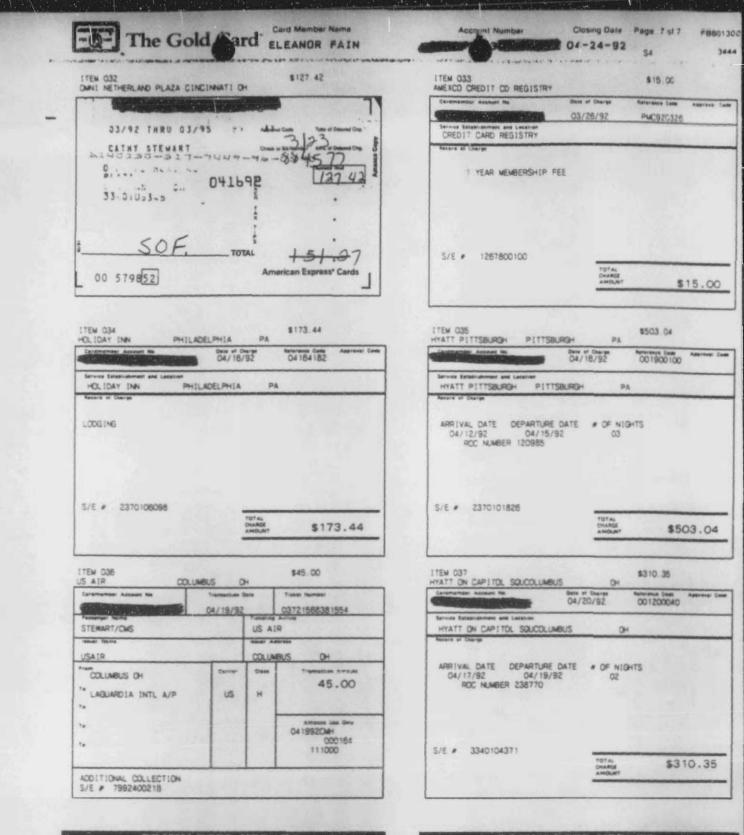
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The Gold Gard ELEANOR FAIN Closing Date Page 5 of 7 Account Number F8801300 04-24-92 St - Andrews 3442 warded at 1. 10 Aug. 1 Mar. 80.000 ITEM 018 HYATT REGENCY WASHINWASHINGTON ITEM 017 HOLIDAY INN \$277.70 \$202.64 30 PHILADELPHIA PA Caremamor Assess No Gats of Charge Aufdranza Lade Approval Cede Aurerance Cada Austraver Com Bats of Charge ----ant. No. State of the 03/28/92 04/15/92 04154722 001600480 PHILADELPHIA Savera Extensionand and Langton HYATT REGENCY WASHINGTON 54 ------PA DC HOLIDAY INN Record of Charge Ascale of Charge ARRIVAL DATE DEPARTURE DATE . OF NIGHTS LODGING 03/24/92 03/25/92 ROC NUMBER 388529 01 S/E # 4080100944 S/E # 2370106098 TOTAL CHARGE AMOUNT TOTAL DHARGE \$277.70 \$202.64 ITEN 019 HOLIDAY INN HOLIDAY INN \$241.31 \$121.90 PHILADELPHIA PA PHILADELPHIA PA Date of Charge 04/15/92 Approval Ceda Data el Enarget 04/16/92 04 164 150 O4 154723 Appraval Cade ---ra Latan HOLIDAY INN PHILADELPHIA PA HOLIDAY INN PHILADELPHIA PA Rectord of Diarge Subbra tel Charge LODGING LODGING S/E # 2370108098 S/E # 2370106098 TOTAL DHARDE AMOUNT \$241.31 \$121.90 ITEM 021 HYATT PITTSBURGH ITEM DZD \$145.72 \$50.01 HOLIDAY INN PHILADELPHIA PA PITTSBURGH PA Approval Con D4 184 151 Data of Course 04/15/92 CO1900100 Approver Case Carsmanian Approx Date of Charge 04/18/92 Service Establishment and Loca Service Established HOLIDAY INN PHILADELPHIA PA HYATT PITTSBURGH PITTSBURGH PA Aucurs at Diarga Record of Diarso LODGING ARRIVAL DATE DEPARTURE DATE # OF NIGHTS 04/12/92 04/14/92 ROC NUMBER 120931 02 S/E # 2370106098 S/E # 2370101826 TOTAL CHARGE AMOUNT TOTAL CHARGE \$145.72 \$50.01 ITEM 022 HYATT PITTSBURGH TEM 023 \$361.93 \$403.02 PITTSBURGH PITTSBURGH PA DA. 04/15/92 Data at Dearge 04/15/92 001900080 OC 1900090 Approval Cau Indust Addressed from Appropriate Appropriate HYATT PITTSBURGH PITTSBURGH HYATT PITTSBURGH PITTSBURGH PA PA Record of Charge Nocara of Charge ARRIVAL DATE DEPARTURE DATE # OF NIGHTS 04/12/92 04/14/92 02 ROC NUMBER 120930 ARRIVAL DATE DEPARTURE DATE # DF NIGHTS D4/12/92 04/14/92 02 RDC NUMBER 120932 S/E # 2370101828 S/E # 2370101826 \$361.93 \$403.02

Closing Date: Page 6 el 7 Card Member Name Account Number F6801300 The Gold ard ELEANOR FAIN 04-24-92 \$4 3443 ITEM 024 OMNI AMBASSADOR EASTCHICAGO TTEM 025 OWNI AMBASSADOR EASTONICAGO \$149.78 \$186.27 11 11 Cordmonter Account No Gate of Charge Ratarance Cede Approval Cada Date Af Diarge Autorence Code DAY ADDRESS No. Add-oval Care THE R. LEWIS 04/16/92 04/16/92 237838 237839 DANI AMBASSADOR EASTCHICAGO OMNI AMBASSADOR EASTCHICAGO 11. 12 Anin's of Charge Record of Charge ARRIVAL DATE DEPARTURE DATE # OF NIGHTS 04/16/92 04/17/92 01 ROC NUMBER 237838 ARRIVAL DATE DEPARTURE DATE # OF NIGHTS 04/15/92 04/17/92 01 ROC NUMBER 237839 S/E # 3120103866 S/E # 3120103866 TOTAL CHARDE AMOUNT TOTAL DHARDE AMOUNT \$149.78 \$186.27 TEM 026 \$4.12 ITEM 027 \$4.12 DAK BROOK GTE AIRFONE, DAK BROOK 11 11 Card Date of Decree 04/15/92 Approval Cum 04/15/92 021624540 021624541 Approval Case off and Lot ---- Catum m and Lo GTE AIRFONE. OAK BROOK GTE AIRFONE, 11 OAK BROOK 1L Barners of Charge Banara at Daira TO TEL NO. 212-799-2100 001 MINS \$04.12 TO TEL NO. 800-950-1022 001 MINS \$04, 12 FROM UNITED FROM UNITED SIE # 3128525112 S/E # 3126525112 \$4.12 \$4.12 ITEN 029 HYATT ON CAPITOL SQUCOLUMBUS ITEM 028 \$103.77 \$155,46 HYATT ON CAPITOL SOUCOLUMBUS OH OH Account for Nataranas Cada 001200050 Appreval Los 001200050 Approval Case 04/19/92 04/19/92 larves Excellationant and Location Service Republications and Local HYATT ON CAPITOL SOUCOLUMBUS HYATT ON CAPITOL SOUCOLUMBUS OH OH Record of Dearer Surgers of Charge ARRIVAL DATE DEPARTURE DATE # OF NIGHTS 04/17/92 04/18/92 01 ROC NUMBER 238867 ARRIVAL DATE DEPARTURE DATE # OF NIGHTS 04/17/92 04/16/92 01 ROC NUMBER 238867 S/E # 3340104371 S/E # 3340104371 TOTAL DRARD \$103.77 \$155.46 ITEM 030 \$489,75 ITEN 031 GOLDEN TYPEWRITER & NEW YORK NY \$118.47 DAYS INN OF BUFFALD CHEEKTOWAGA NY =V 1200-#03/92 THRU 03/95 48 AT me 03/92 THRU 03/95 89 23 has of Desired Con - GATH- HEWES 1-7244-1 020095 > 631 489 90104 32PP1E0 262040 02 049124 441011314 8 11 4 GOLDINS FILMAS FOR PALS Synctions on filmon enfele 118-47 46年78 American Express" Cards American Express* Cards 00 512168 00 522444

ON



PRIVILEGES UPDATE



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MEMBERSHIP MILES

Earn valuable miles with the

American Express(R) Card!

Enroll in the Membership Miles(sm) program and you can earn miles by charging with The Card. You can redeem miles into 5 arriine frequent flyer programs, or use for vacation packages and more. Call for more details 800-343-0330. \$25 annual program fee waived for first year of enrollment. PRIVILEGES UPDATE

Benny Gnest.

Be My Guest(R) Restaurant Certificates

Treat someone special with a Be My Guest(R) Restaurant Certificate. It's the perfect gift for Mother's Day, Secretary's Day, greduations and weddings. Your guest will enjoy a fine dining experience at any restaurant that accepts The Card. Call 800-535-GIFT to order.

LENORA B. FULANI FOR PRESIDENT 250 WEST-57TH STREET, SUITE 317 NEW YORK, NY 10019 2384 11/21 91 1-337/260 of acoress d vinety five + 25/200 cot 209534 sar AMALGAMATED BANK OF NEW YORK NOT NEGOTIABLE 3110AM 31031541 MO in N 3 0 ~ N 5 0 ~ 0

Sun	portion to Corporat	In upper portion with check or money orues. But inter-	statement C	
Previo	s43.27	New Charges Other Debits Payments Received \$2,760.32 \$55.00 \$43.27	Other Credits	S2.835.32
	14			
Reference Number	Ites Number	Description of Monthly Activity	Charges	Credits
		PREVIOUS BALANCE	\$43.27	
331275		PAYMENT RECEIVED - THANK YOU 10/02		43.27
323291		MEMBERSHIP FEE ADJUSTMENT 10/18	55.00	
		BONANZA GENERAL STORE LAS VEGAS NV INV#044978	35.47	
41282	2	SHERATON SAN PEDRO HOTEL SAN PEDRO CA	10.50	
01272	3	TONY ROMAS INGLEWOOD CA		
01272	4	348010006 FOOD/BEV 09/27/91 LAS VEGAS HILTON LAS VEGAS NV	23.17	
01273	5	5 RESTAURANT 09/28/91	63.78	
		985247 LODGING 09/29/91	205.24	
95286	6	HERTZ CAR RENTAL LOS ANGELES CA	1.832.92	
95288	7.	HERTZ CAR RENTAL LOS ANGELES CA	Reference and the second of the	
01205		R/A# 229817652 HERTZ CAR RENTAL 10/11/91	262.33	

10/11791 CA

10/20/91

346.91

\$43.27

380005001

1692

\$2,835.32

\$2.835.32

Payments or credits received after closing date above will appear on next month's statement.

R/A# 229817652 HERTZ CAR RENTAL RAMADA INNS LONG BEACH 84111194 LODGING

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FOR FAST BALANCE AND PAYMENT INFORMATION, CALL OUR AUTOMATED SERVICE LINE AT 1(800)292-AMEX USING A TOUCH TONE PHONE. PLEASE HAVE YOUR ACCOUNT NUMBER READY. IF YOU HAVE ANY QUESTIONS ABOUT YOUR ACCOUNT. CALL 1-800-528-2122 (24 HOURS 7 DAYS) OR WRITE US AT P.O. BOX 53779, PHOENIX, AZ 85072-3779. Lease a new 1992 car and save up to 20 percent through the Small Business FleetPlan(SM). Call 1-800-451-3796 for more information.

TOTAL CHARGES AND CREDITS

Page 1 of 3

BALANCE DUE

Please see reverse side for important information regarding certain types of charges.

tran. Here's -Please The bill is dated harges 22 e within auverce

	15 ANIELSS MILL 200		699480
	HES: 79121334377 RES CLS: - MILEAGE IN: 3412 MILEAGE OUT: 3412 MILES DRIVEN. 1492	THE STATE	
FAT. JEC DECLINED	MILES DRIVEN: 3492 GILES ALLOWED: PLANILMUS, RAIE CLS:F S FARGED: COAT S FARGED: 17.01/ HOUR T.01/ HOUR MILE	ADD HARGES LOW LTS DET PUEL PARCES LOW TAXABLE SUBTOTAL TAXABLE SUBTOTAL	
REVIAL FORM OF PAYMENT: AMX 128362941621003 REFURN FORM OF PAYMENT: AMX 328362941621003 PREPARED BY: 1926 COMPLETED BY: 2248 STATEMENT OF CHARGES - NOT VALID FOR RENTAL	CC APP: 1236.00/ 000032 CC APP: 13597.00/ 25 RENTAL RECORD	229215	i 1872.9 3 7 2
RENTAL: 10/11/91 22:17 RETURN: 10/14/91 22:06	CDP: 11782	DAXS 3	194.9
PI CUMINA EURO NSP CA 2X06187 01198/8296188	MILEAGE IN: 7354 MILEAGE OUT: 6964 MILES ORIVEN: 390	EX HOURS EX DAYS WEEKS MILEAGE CHG DISCOUNT 5% SUBTOTAL INTER CITY (1 ADOL CHARGES (1	(X) X) X) X) S
PAI, PEC DECLINED	MILES ALLOWED: MILES DHARSED: PLAN: SDUD RATE CLS:F 4 / WEEK 5 64.99/ DAY 5 / XDAY 3 / HOUR 5 / MILE	LDW (N LIS (N PAI, PEC IN FUEL PURCH OPT (T TAXABLE SUBTOTAL TAX .08250 TOTAL CHARGES MISC VOUCHER RENTAL CERT DEPOSIT NET DUE	(1) \$ 27.0 1) \$ 17.8 (7) \$ 15.0 X1 \$ 200.9 \$ 262.3 \$ 262.3
RENTAL FORM OF PAYMENT: ANX 378362941621003 RETURN FORM OF PAYMENT: ANX 378362941621003 PREPARED BY: 2748 COMPLETED BY: 7351 STATEMENT OF CHARGES - NOT VALID FOR RENTAL	CC APP: \$268.00/ 28	NET QUE	\$ 262.3

7 9

ENORA B. FULANI FOR PRESIDENT 200 WEST 72ND STREET, SUITE 30 6527. NEW YORK, NY 10023 1-337/260 arganat wilder alla 11 unty Si AMALGAMATED BANK OF NEW YORK 1718 Broadway, New Yosk, N.Y. 1001 NOT NEGO 11 15 pl ste 1 90 260033791: 11031 5 15M AND AND AND A STATE AND A STATE からのある A PETER PARTY **的时间的了这些"你们就**是这一 1.3 in early 210 1 - 32 10 0 10 10 10 0 ~ 3 V 0 國語 199 32. 88 Stores & W

LENORA B. FULANI FOR PRESIDENT

REQUEST FOR REIMBURSEMENT

Date Submitted: 9/1____ Amount s_ 136.3 WV Name: Marge Golde Address: 251 Piece St State where expense occurred: Purpose (give brief description):___ telephone Charges re: field operation (Receipts must be attached for reimbursement) for office use only ck# Date: please send that to me & I will pay bill with my partion included. Marks - Marge

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0 4

Account Number

Statement Date

Aug 19 1997

Please Save For Your Records Check No: Date: Amount:

Page 1

A Pacific Telesis Company

	Statement Date Aug 19, 1992	Date: Amount:				
Account	Previous bill	46.26				
Summary	Payment 7/29	46.26CR				
	Balance *** Thank You for Your Paymen	.00				
	Current charges:					
	Pacific Bell (Page 2)	168.06				
×	Pacific Bell Information Services (Page 8)	5.95				
	AT&T (Page 9)	5.94				
	Sprint (Page 10)	.97				
	Excel Telecommunications Inc. (Page 11)	. 16				
	CURRENT CHARGES DUE BY Sep 19, 1	992 181.08				
otal Due		181.08				
ate Charge leminder	A late charge may apply on Sep 22 if your p must still be paid before the DUE BY date to	bayment has not been received. Your bill, however,				
hom to call	For billing questions call:					
	Pacific Bell	No Charge 811-6100				
	AT&T	No Charge 1 800 222-0300				
	Sprint	No Charge 811-6100				
	Excel Telecommunications Inc.	No Charge 1 800 875-9235				
	When moving or placing an order call:	1				
	Pacific Bell	No Charge 811-6222				
	Ordenes y arreglos de cuentas:	Llame gratis 811-7730				
	The NEW 811 OR 800 NUMBERS may not be available in your area. Call the Business office number on your bill or call Directory Assistance for an alternate number.					
	MG owes on them Reg. Cha LBCampau	sh ours: 136.31				
	PLEASE DETACH AND RETURN THIS P Account Number Statemen 158 N8 Aug 19	t Date Payment Due Total Due				
	Enter Amount Paid > > > Make Check Payable To Pacific Bell	\$				
	SF/QB 2 0Z **CR32	helfordalahood and allordalahood				
	MARGE GOLDEN 251 PIERCE	PACIFIC BELL PAYMENT CENTER SAC CA 95887 0001				
	SN FRANCISCO CA 94117	SHC CH 12001 0001				
		102 8646363 007 415 158				
		00 276 89015 18108				

PACIFIC BELL

Page 2

8

Aug 19,1992

Account Number

Statement Date

PACIFIC BELL.

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Questions	For	bill	ing que	stions	cal	1:	No	Charge		811-	6100
Service Area 1	Ita	Date	Time	Min	ж	Place	and	Number	Called		Charg
alls	1	Ju120	1158A	8	SD	SAN FRAN SAN FRAN	CA	- 38 Callin	a Card		
	2	Ju120	238P	4	SD	BERKELEY SAN FRAN	CA	510 52 Callin	6 9999	From	.9
	3	Ju120	344P	5	SD	SAN FRAN SAN FRAN	CA	- 28 Callin	2 5300 g Card	From	1.0
	4	Ju120	728P	2	SE	BERKELEY SAN FRAN	CA	510 48 Callin	6 9035	From	.70
	5	Ju120	821P	3	SE	SAN FRAN SAN FRAN	CA	- 75 Callin	3 9723 g Card	From	.8
		Jul21	112P	6		BERKELEY MT VIEW	CA	510 54 Callin	0 9507 g Card		
	7	Ju121	548P	7	SE	BERKELEY MT VIEW	CA	510 52 Callin	5 4300 g Card		
	8	Jul21	637P	4		SAN RAFAE	CA	- 45 Callin	g Card		
	1	Ju122	131P	7		SAN FRAN BERKELEY	CA	- 64 Callin	1 8522 g Card		
		Ju122		7		SAN FRAN BERKELEY	CA	- 98 Callin	6 9307 g Card		
		Ju122	256P	10		SAN FRAN BERKELEY	CA	- 75 Callin	g Card		
		Ju122				OAKLAND SAN RAFAE	L CA	510 98 Callin	a Card		
		Ju122	729P			BERKELEY SAN RAFAE	L CA	510 52 Callin	g Card		
	1.		1134A			OAKLAND SAN FRAN	CA	510 98 Callin	g Card		
			1255P	4		PALO ALTO SAN FRAN	CA	- 85 Callin	g Card		
	1	Ju123	333P	1		SNCRSBLMN SAN FRAN	CA	- 59 Callin	g Card		
			337P	3		LOS GATOS SAN FRAN	CA	408 35 Calling	g Card		
		Jul23	349P	3		SNCRSBLMN SAN FRAN	CA	- 59 Calling	g Card		
	1		741P	11		MT VIEW SAN FRAN	CA	Calling	Card		2.35
		Ju123	749P	1		SAN FRAN	CA	- 59 Calling	Card		
			1125A			OAKLAND SAN FRAN	CA	510 98 Calling	Card		
	122.0		200P			NOVATO SAN FRAN	CA	- 89 Calling	Card		
			225P 241P				CA	510 480 Calling - 897	Card		1.17
		Ju124	241P 715P	2		NOVATO SAN FRAN SAN FRAN	CA	Calling - 346	g Card		.76
			816P	1		SAN FRAN HAYWARD	CA	Calling 510 733	Card		.77
-			819P	4		SAN FRAN	CA	Calling - 753	Card		. 86
						SAN FRAN	CA	Calling 510 547	Card		. 00
			1017A 1229P	3		OAKLAND SAN FRAN BERKELEY	CA	Calling 510 486	Card		.78
		readed.		-		BERKELEY		Calling			

PACIFIC BELL A Pacific Telesis Company

Account Number

Statement Date

PACIFIC BELL.

daes erous	and base				1 : No				
Service	Itm Date	Time	Min	×					
area 1 Calls	1 Ju125	422P	15	SN	PTCHMOND (CA - 2 CA Calli	og Card		
Continued	2 Jul25	517P	8	SN	SUNNYVALE	CA 408 74 CA Callin	46 9404	From	1.43
	3 Ju125	919P	1	SN	SAN FRAN	CA - 2 CA Calli	55 3103	From	.66
	4 Jul27	335P	2	SD	SNCRSBLMNT	CA - 59 CA Callin	95 9942	From	1.01
	5 Jul27	338P	3	SD	SAN FRAN	CA - 92 CA Callin	28 9327	From	.91
	6 Jul27	617P	5	SE	BERKELEY	CA 510 52 CA Callin	25 4300	From	1.02
	7 Jul27	622P	3	SE	BERKELEY	CA 510 84 CA Callin	13 6438	From	.88
	8 Jul27	626P	3	SE	BERKELEY	CA 510 84 CA Callin	13 6438	From	.88
	9 Jul27	632P	6	SE	SAN FRAN	CA - 39	98 9102	From	.96
	10 Ju128	228P	5	SD	SAN FRAN	CA Callin CA - 75 CA Callin	53 9806	From	1.05
	11 Jul28	521P	1	SE	SAN FRAN	CA - 66	54 3321		.77
	12 Jul28	522P	1	SE	SAN FRAN	CA Callin CA - 60	54 3321	From	.77
	13 Jul28	527P	4	SE	SAN FRAN		53 9414	From	1.11
	14 Jul29	731P	3		HAYWARD SNCRSBLMNT	CA Callin CA - 59 CA - 29	19 Card 95 9942	From	.39
	15 Jul29		3		SAN FRAN	CA Callin	ng Card		
	16 Jul29				SAN FRAN	CA 510 90 CA Callin	g Card		
	17 Jul30				SAN FRAN	CA - 44 CA Callin	ng Card		
	18 Jul31	458P	3		SAUSALITO (CA - 2 CA Callin	o Card		
	19 Jul31	629P	5	SE	MTILVALLEY (CA 510 52 CA Callin	ng Card		
	20 Jul31	643P	1	SE	MTILLVALLEY	CA 510 52 CA Callin	ng Card		
	21 Aug 1	1015A	2	SN	PALO ALTO	CA - 32 CA Callin	23 1719	From	
					BERKELEY	CA 510 52 CA Callin	25 4300 ng Card	From	
	1				BERKELEY ORINDA	CA 510 52 CA Callin	25 4300 1g Card	From	
	24 Aug 1	331P	1	SN	BERKELEY ORINDA	CA 510 52 CA Callin	26 9918 1g Card	From	
	25 Aug 2	1127A	1	SN	BERKELEY SAN FRAN	CA 510 52 CA Callin	15 4300 19 Card		.66
	26 Aug 2	501P	10	SN	ORINDA	CA 510 2 CA Callin	54 9848	From	1.15
	27 Aug 3	122P	1	SD	OAKLAND	CA 510 42 CA Callin	28 9533	From	.77
	28 Aug 3	124P	6	SD	OAKLAND	CA 510 42 CA Callin	28 9533	From	1.12
	29 Aug 3	626P	2	SE	PALO ALTO	CA - 33 CA Callin	29 0461	From	. 92
	30 Aug 3	733P	3	SE	ORINDA SAN FRAN	CA = 2!	55 6975	From	.88

Aug 19,1992

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Page 3

PACIFIC : BELL

Account Number

. A.,

Statement Date

Aug 19,1992

PACIFIC BELL.

luestions	For billi	ing que	stions	cal	1:	No	Charge		811~	6100
ervice	Itm Date	Time	Min	×	Place :	and I	Number C	alled		Charg
rea 1 alls	1 Aug 3	736P	4	SE	ORINDA SAN FRAN	CA	Calling - 255	6975	From	.9
	2 Aug 4			SD	ORINDA OAKLAND	CA	Calling 510 987	Card 2722	From	2.4
	3 Aug 4				SUNNYVALE SAN FRAN	CA	C-11imm	Cand		1.7
	4 Aug 4				SUNNYVALE SAN FRAN	CA	Calling - 861	Card 9730	From	1.4
	5 Aug 4				SUNNYVALE SAN FRAN		Calling - 255			
					SUNNYVALE SAN FRAN	C.A.	Calling - 255	Card		
	6 Aug 4				CAMPBELL	C1.0.	Calling	Cand		
	7 Aug 5				SAN FRAN SAN FRAN	CA	- 255 Calling	Card	From	1 7
	8 Aug 5				SAN FRAN ORINDA	CA	- 255 Calling	Card		
	9 Aug 5				SAN FRAN ORINDA	CA	- 255 Calling	Card		
	10 Aug 5				OAKLAND	60	510 987 Calling	Card		
	11 Aug 5	747P	8	SE	SAN MATEO ORINDA	1.040	1.811180	Lara		
	12 Aug 6	1141A	4	SD	HAYWARD REDWOOD CY	V CA	510 881 Calling	Card		
	13 Aug 6	1230P	2		OAKLAND	CA	510 987 Calling	2722 Card	From	
	14 Aug 6	411P	3	SD	PALO ALTO	CA	- 323 Calling	1719 Card		
	15 Aug 6	424P	1	SD	SAN FRAN LGTOS	CA	- 255	6975	From	.7
	16 Aug 6	632P	5	SE	SAN FRAN	CA	- 255	6975	From	1.3
	17 Aug 6	637P	1	SE	LGTOS SAN FRAN LGTOS	C 6	Calling	Cand		
	18 Aug 7	1250P	4	SD	BERKELEY	CA	510 486	1218		
					SAN RAFAEL	CA	510 987	2722	From	. 8
	20 Aug 7				SAN FRAN	CA	- 255	7664	From	2.0
	21 Aug 7	321P	3	SD	SAN RAFAEI SAN FRAN	CA	- 255	4799	From	1.0
					SAN RAFAEL	A CA	- 924	5850	From	1.8
	23 Aug 7				SAN FRAN	CA	- 255	4799		
	24 Aug 7		3	SD	CORTEMADR	CA	- 255	4799	From	1.0
	25 Aug 7		1	SD	CORTEMADRA SAN FRAN	CA	- 255	7664	From	.8
	26 Aug 7		2		CORTEMADRA SAN FRAN	CA	Calling - 824	2753	From	.7
	27 Aug 8		1		SAN FRAN SAN FRAN	CA	Calling - 431	4089	From	.6
	28 Aug 8		1	SN	SAN FRAN PALO ALTO	CA		9097	From	.4
	29 Aug 8		2		LGTOS SAN FRAN		Calling - 255	Card 7664	From	.6

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Page

PACIFIC

Account Number

Statement Date

Aug 19,1992

PACIFIC BELL.

Questions										
Service Area 1	Itm Date	Time	Min	×	Place	and	Number	Called	_	Charge
Calls Continued	1 Aug 8	1128A	3	SN	LGTOS PACIFICA	CA	Callin - 35	5 9846	From	.73
		1131A		SN	LGTOS SAN FRAN	CA	Callin - 28	5 4621	From	1.1
		1218P		SN	LGTOS OAKLAND	CA	Callin 510 98	7 2722	From	.7
	1	148P		SN	LGTOS PACIFICA	CA		5 9846	From	1.0
	5 Aug 8	442P	1	SN	CAMPBELL SAN FRAN	CA		5 6975	From	.7
	6 Aug 8	543P	1	SN	CAMPBELL BERKELEY	CA	Callin 510 52	5 4300	From	.7
	7 Aug 8	613P	6	SN	CAMPBELL BERKELEY	CA	Callin 510 52	5 4300	From	1.2
	8 Aug 8	618P	5	SN	CAMPBELL SAN FRAN	CA		5 6975	From	1.1
	9 Aug 8	656P	1	SN	CAMPBELL LOS GATOS	S CA	Calling 408 35 Calling	4 0810	From	.6
	10 Aug 8	700P	1	SN	CAMPBELL BERKELEY	CA	510 52	5 4300	From	.7
	11 Aug 9	1231P	5	SN	CAMPBELL BERKELEY SAN FRAN	CA	Callin 510 52 Callin	5 4300	From	. 8-
	12 Aug10	104P	7	SD	SAN FRAN HALFMOONE	CA	- 75	3 9119	From	1.8
	13 Aug10	130P	2	SD	BERKELEY	CA	510 48	6 1218	From	1.0
	14 Aug10	148P	1	SD	PACIFICA	CA	- 35	5 9846	From	.8
	15 Aug10	151P	1	SD	PACIFICA	CA	- 35	5 9846	From	.8
	16 Aug10	330P	1	SD	SAN FRAN	CA	- 25	5 4799	From	. 8.
	17 Aug10	333P	7	SD	BERKELEY	CA	510 48	6 9601	From	2.0
	18 Aug10	400P	1	SD	SAN FRAN	CA	- 25	5 4799	From	.8
	19 Aug10	415P	12	SD	SAN FRAN HALFMOONE	CA	- 25	5 4799	From	2.6
	20 Aug10	524P	8	SE	BERKELEY	CA	510 48	6 1218	From	1.7
	21 Aug10	720P	5	SE	SAN FRAN	CA	- 75 Callin	3 9722 g Card		
	22 Aug10	731P	1		SAN FRAN	CA	- 49 Callin	5 9340 g Card		
	23 Aug10	733P	1	SE	SAN FRAN HALFMOONE	CA	- 25	5 6975	From	.7
	24 Aug10	750P	7	SE	SAN FRAN HALFMOONE	CA Y CA	- 25 Calling	5 6975 g Card		1.4
	25 Aug11	209P	8		ORINDA CAMPBELL		510 25 Calling	g Card		2.6
	26 Aug11	243P	7		SAN FRAN CAMPBELL	CA	Calling	5 4799 g Card		2.4
	27 Aug11	351P	4		OAKLAND CAMPBELL	CA	510 98 Callin	g Card		1.6
	28 Aug11	516P	7		SAN FRAN CAMPBELL		Calling	3 9441 g Card		1.8
	29 Aug11	658P	9	SE	SAN FRAN	CA	- 25	5 7664	From	2.2

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PACIFIC BELL

Page 6

Account Number

Statement Date

Aug 19,1992

PACIFIC BELL.

Questions	Fo	r bill:	ing que	stions	cal	1:	No	Charge		811	-6100
Service	It	m Date	Time	Min	×	Place	and	Number (Called		Charg
Area 1 Calls Continued	1	Aug11	854P	1	SE	CAMPBELL BERKELEY CAMPBELL	CA	Calling 510 52 Calling	\$ 4300	From	.8
	2	Aug 12	810A	2	DD	CAMPBELL	CA	408 559	5750		.5
	3	Aug12	810A 206P	2		OAKLAND HAYWARD	CA	510 987 Calling	2722	From	
	4	Aug12	240P	1	SD	BERKELEY	CA	510 525 Calling	4300	From	. 8
	5	Aug12	241P	3	SD	OAKLAND	CA	510 987 Calling	2722	From	1.0
	6	Aug12	311P	2	SD	LOS GATOS	CA	408 395	6363	From	1.1
	7	Aug12	313P	1	SD	HAYWARD LOS GATOS	CA		6363	From	.9
	8	Aug12	314P	1	SD	HAYWARD LOS GATOS	CA	Calling 408 358	3454	From	.9
	9	Aug12	345P	3	SD	HAYWARD REDWOOD C	Y CA		6832	From	1.0
	10	Aug12	546P	7	SE	HAYWARD PALO ALTO	CA	Calling - 853	9073	From	1.10
	11	Aug12	654P	12	SE	HAYWARD MT VIEW	CA		7107	From	1.75
	12	Aug12	812P	2	SE	HAYWARD SAN FRAN	CA	Calling - 255	4799	From	.88
	13	Aug12	813P	1	SE	HAYWARD	CA		4300	From	.7
	14	Aug13	740P	4	SE	HAYWARD	CA	Calling 408 746	9227	From	.86
	15	Aug14	0360	1	חח	CAMPBELL		Calling 408 559			.34
			427P			SAN FRAN OAKLAND	CA	- 255 Calling	7664	From	
	17	Aug17	430P	1	SD	OAKLAND	CA	510 987 Calling	2722	From	.77
	18	Aug17	430P	1	SD	BERKELEY	CA	510 525 Calling	7300	From	.77
	19	Aug17	431P	3	SD	BERKELEY	CA	510 525 Calling	4300	From	.91
	20	Aug17	600P	1	SE	SAN FRAN OAKLAND	CA		6975	From	. 71
	21	Aug17	601P	2	SE	SAN FRAN OAKLAND	CA		6975	From	.76
	22	Aug18	553P	4	SE	CAMPBELL ORINDA	CA	408 559	5750	From	1.36
	×	See Ra	te Key	on Rev	erse)	UN	Juring	ourd		
	Se	rvice	Area Ca	11 Sub	tota	1					\$149.78
one 3	Ita	Date	Time	Min	×	Zone Plac	e al	nd Numbe	r Call	ed	Charge
alls			124P te Key			3 SAN	MATI	- 03	578 72	76	. 10
	-										

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Zone 3 Call Subtotal

PACIFIC : BELL A Pacific Telesis Company

Page 7

Account Number

Statement Date

Aug 19,1992

PACIFIC BELL.

Questions	For billing questions call: No Charge	811-6100
Regulated	Itm	Charge
Monthly Charges and Credits	Basic Service 1 Residence Service Flat Rate 8.35 Optional Service(s) 1 Inside Wire/Jack Repair and .60 Trouble Isolation Plan .60 Custom Calling Services: 3.50 1 Call Waiting 3.50 1 3-Way Calling 3.50	
	1 Monthly Service Aug 19, 1992 thru Sep 18, 1992	15.95
	DISCOUNTS 2 15% off \$7.00 From Aug 19 thru Sep 18 for Custom Calling Services on 1 Line(s)	1.06
	Regulated Monthly Charges and Credits Subtotal	14.89
	 3 Charges for Network Access for Interstate Calling Imposed by Federal Communications Commission 4 Universal Lifeline Telephone Service Surcharge. 5 Rate Surcharge 6 State Regulatory Fee 7 Communication Devices Funds for Deaf and Disables 8 Tax: Fed: 4.87 911: 1.11 	3.50 5.99 12.79 .15
	Regulated Monthly Charges and Credits Subtotal	\$18.18
Total	Pacific Bell Current Charges	\$168.06

PACIFIC

Page

8

Account Number Statement Date

Aug 19,1992

ACIFIC			
Questions	For billing questions call:	No Charge	811-6100
Monthly	Itm		Charge
Charges and Credits	Monthly Service(s) 1 Message Center Call An 1 Monthly Service Aug 19, 1992		5.95
	Monthly Charges and Credits Sul	ototal	\$5.95
Total	Pacific Bell Information Servic	ces Current Charges	\$5.95

PACIFIC BELL

Page

9

A Pacific Telesis Company

8

Account Number

Statement Date

Aug 19,1992

ATAT									
Questions	For AT&T billing questions on this page call: No Charge 1 800 222-0	300							
Calls	Itm Date Time Min * Place and Number Called	Charge							
	1 Aug13 514P 2 SE SAN DIEGO CA 619 224 3655 FromI LOS GATOS CA Calling Card	.83							
	2 Aug13 745P 3 SE NEW YORK NY 212 956 5550 FromI	1.28							
	3 Aug16 802P 1 SN SAN FRAN CA - 255 6975 FromI	.68							
	4 Aug16 1042P 6 SN SAN FRAN CA - 255 6975 FromI	1.20							
	5 Aug16 1049P 1 SN SAN FRAN CA - 641 8522 FromI	.68							
	6 Aug16 1050P 3 SN SAN FRAN CA - 255 7664 FromI LA JOLLA CA Calling Card	.89							
	* See Rate Key on Reverse I AT&T Telephone Calls charged to a Pacific Bell Card								
	Call Subtotal	\$5.56							
Monthly	Itm								
Charges and Credits	7 Universal Lifeline Telephone Service Surcharge. 8 Communication Devices Funds for Deaf and Disabled 9 Tax: Fed: .17 911: .03								
	Monthly Charges and Credits Subtotal	\$.38							
Total	AT&T Current Charges	\$5.94							

This portion of your bill is provided as a service to AT&T. There is no connection between Pacific Bell and AT&T. You may choose another company for your long distance calls while still receiving your local telephone service from Pacific Bell.

30

PACIFIC

Page 10

Account Number

Statement Date

Aug 19,1992

Questions	For billing questions call: No Charge 811-	6100
Calls	Itm Date Time Min * Place and Number Called	Charge
	1 Aug 7 1010P 3 SE SACRAMENTO CA 916 448 0750 From SAN FRAN CA Calling Card * See Rate Key on Reverse	.89
	Call Subtotal	\$.89
Monthly	Itm	Charge
Charges and Credits	2 Universal Lifeline Telephone Service Surcharge. 3 Tax: Fed: .03 911: .01	.04
	Monthly Charges and Credits Subtotal	\$.08
Total	Sprint Current Charges	\$.97

_		IFIC BELL
	Account Number	Page 11
	Statement Date Aug 19,1992	
Questions	For billing questions call: No Charge 1 800	875-9235
Calls	Itm Date Time Min * Place and Number Called	Charge
	1 Jul30 323P 1 DD LOSANGELES CA 213 356 9687 * See Rate Key on Reverse	. 15
	Call Subtotal	\$.15
Monthly	Itm	Charge
Charges and Credits	2 Universal Lifeline Telephone Service Surcharge. 3 Tax:	.01 .00
	Monthly Charges and Credits Subtotal	\$.01
Total	Excel Telecommunication Current Charges	\$.16

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LENORA B. ANI FOR PRESIDENT 200 WES AND STREET, SUITE 30 NEW YORK, NY 10023 5617 1-337/260 14 14 21.5 1. V-733 57 La vizi 23 Til.T AMALGAMATED BANK OF NEW YORK 1710 Brozdway, New York, N.Y. 10015 NOT NEGOTIABLE 4.10377 41201 . Her *005617* ::026003379: 31031541 and and the provider another transformer and the set the (19) 大田市で 0 S M 3 0 M T 0 0



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Please Midin this portion for your files.

Cardmember I.ame

MARGARET E GOLDEN

Account Number

Closing Date 06-22-92

For fast balance and payment information, call our automated service line at 1-800-292-AMEX using a touch tone phone. Please have your account number ready. If you have a question about your account, call 1-800-528-4800 (24 hours/7 days).

Summary of Account

Page 1 of 2

\$161.47			7 \$169.66			\$1	\$925.33	
Amex Ref. No.	Item No.	Listing of Ch	arges and Credits	na a tao tao il mandala da	Charges	1	Credits	
831163-0		PAYMENT	RECEIVED - THANK YOU	06/11			169.66	
501153-1	001		TORES SAN LEANDRO 5 GENERAL MERCHANDISE	CA 05/31/92	140			
501153-1	002	Office D	epot inc. SAN LEANDRO	CA	142.1			
501155-1	003	BUDGET R	2 OFFICE PROD. & SUPPLIES ENT A CAR SAN FRANCISCO	CA	80.4	45		
501167-1	004	00200289 TARGET S	3 BUDGET RENT A CAR TORES SAN LEANDRO	06/01/92 CA	272.3	34		
501167-1	005		1 GENERAL MERCHANDISE epot inc. SAN LEANDRO	06/14/92 CA	173.	12		
501174-1	006		4 OFFICE PROD. & SUPPLIES	06/14/92	118.9	91		
		32717308	8 GENERAL MERCHANDISE	CA 06/21/92	75.1	73		
501174-1	007		epot inc. SAN LEANDRO 2 OFFICE PROD. & SUPPLIES	CA 06/21/92	70.1	14		
			ACCO	UNT TOTAL	\$933.5	52	\$169.66	
					1.2.1			

Payments or credits received after closing date above will appear on next month's statement.

AMERICAN EXPRESS GIFT CHEQUES - THERE'S NO BETTER WAY TO GIVE THE GIFT OF MONEY - APPRECIATED & APPROPRIATE FOR EVERY OCCASION. Your account renews next month. We look forward to providing you with the benefits of Cardmembership in the coming year.



Please see reverse side for important information.

Control Contro <thcontrol< th=""> <thcontrol< th=""> <thco< th=""><th>Re-LEPERDY REPORTED BUILDING STREET, S</th><th>ARGARET E GOLDEN</th><th></th><th>Closing C</th><th></th><th>2 04 2 DB</th></thco<></thcontrol<></thcontrol<>	Re-LEPERDY REPORTED BUILDING STREET, S	ARGARET E GOLDEN		Closing C		2 04 2 DB
Construction Op/31/92 327192075 TARGET STORES SAN LEANORD CA Norw of Sterm Op/31/92 90011972 DEMERAL MEROWANDISE OFFICE PROC. & SUPPLIES OFFICE PROC. & SUPPLIES ROC NUMBER (03310 STAR STAR STAR STAR Stree of Sterm STAR STAR STAR Star Star ROC NUMBER (03310 STAR	IES SAN LEANDRO CA	\$142.83		N LEANDRO		1.45
DENERAL MERCHANDISE OFFICE PROD. & SUPPLIES RCC NUMBER 03310 S/E + S045719008 S/E + S045719008 100% S/E + S045719008 11242.83 TEN 003 S/E + S045719008 S/E + S045719008 11242.83 TEN 003 S/E + S045718078 S/E + S045719008 11242.83 TEN 003 S/E + S045789781 S/E + S045718008 11242.83 TEN 003 S/E + S045789781 S/E + S045789781 11242 S/E + S045718008 11242 S/E + S045718008 1245 S01 1245 S/E + S045933134 101% S/E + S045833134 100% S/E + S045833134 100% S/E + S045833134 100% S/E + S045833134<	INTER LEAST OF JULY OF	327152075	Service Gradit annual and Laustum Office Depot Inc.	05/31/92	8600	
S/E # 5045718008 Image: status				SUPPLIES		
TOTAL TOTAL MARANT \$ 142.83 TEM 003 \$272.34 Sociel Rest a CAR SAN FRANCISCO CA March Department and Latentian Bit of Department and Latentian BLOCET RENT A CAR SAN FRANCISCO CA March Department and Latentian Bit of Department and Latentian BLOCET RENT A CAR SAN FRANCISCO CA March Department and Latentian Bit of Department and Latentian BLOCET RENT A CAR SAN FRANCISCO CA March of Depart ACAR SAN FRANCISCO CA March of Depart CA 05/17/92 00200202833 RETURN SAN FRANCISCO CA 05/17/92 0020020833 RETURN SAN FRANCISCO CA 06/01/92 132145 BO1 SYE # SOA393313M Total SYE # SOA393313M Total SYE # SOA5718008 TEM 005 SAN LEANDRO A SYE # SOA5718008 Terma Examinational Leanderio BADO25494 Agenetic State SYE # SOA5718008 Terma Examinati and Leanderio CA	NUMBER 03310		ROC NUMBER 8600	17572		
LOGET RENT & CAR SAN FRANCISCO CA Constrainting and latering Bit of State and the stat	TOTAL	\$142.83	S/E # 5045789781	ON	ARCE	\$80.4
Mercent & CAR SAN FRANCISCO CA BLOGET RENT & CAR SAN FRANCISCO CA Mercent & Care & SAN FRANCISCO CA SAN LEANDRO CA TEM COS SAN LEANDRO CA <td>A CAR SAN FRANCISCO CA</td> <th>\$272.34</th> <td></td> <td>N LEANDRO</td> <td></td> <td>12</td>	A CAR SAN FRANCISCO CA	\$272.34		N LEANDRO		12
BLOGET RENT & CAR SAN FRANCISCO CA TARGET STORES SAN LEANDRO CA Marker # Compare LOCATION DATE/TIME RENTAL AGREEMENT SAN FRANCISCO CA RENTAL AGREEMENT SAN FRANCISCO CA RETURN AGREEMENT SAN FRANCISCO CA RETURN TR# SAN FRANCISCO CA SY/E / SOL3333134 TOTAL B01 S/E / SOL35718008 TEM 005 SAN LEANDRO TEM 005 SAN LEANDRO TEM 005 SAN LEANDRO Tem of Saturationment and Leastore OC/21/92 SY/E / SOL35718008 SAN LEANDRO TEM 005 SAN LEANDRO Tem of Saturation	06/01/92	Autoroval Cede Addreval Cede 02002893	STATISTICS IN COLUMN	06/14/92	8474-4458 32718	56081 Alleren
LOCATION DATE/TIME RENTAL SAN FRANCISCO CA 05/17/92 002002893 1245 RETURN SAN FRANCISCO CA 06/01/92 132145 B01 S/E # 5043933134 GOLDEN MARGARE 10744 10044 1004 115.91 TEM 005 F1 CO Depot Inc. SAN LEANDRO CA Rent of Data (Den of Data	INT A CAR SAN FRANCISCO CA		TARGET STORES S	SAN LEANDRO	CA	
SAN FRANCISCO CA 06/01/92 132146 B01 S/E # 5043933134 GOLDEN MARGARE TOTAL BWARG BWARG S/E # 5045718008 S/E # 5045718008 S/E # 5045718008 TOTAL BWARG BW	ATION DATE/TH RENTAL SAN FRANCISCO CA 05/17/9	AGREEMENT		DISE		
S/E * 5043933134 GOLDEN MARGARE TSTAL DWARGARE \$272.34 TEM 005 Ff Ice Depot Inc. SAN LEANDRO CA Server Branchine Bet of Charge Brooks State OE/14/92 Brooks Date of Charge Branchine Date Approach Date Detroit of Charge Branchine Bet Approach Date Detroit of Charge Branchine Bet Leastine Off Ice Depot Inc. SAN LEANDRO CA Reserve Branchinement and Leastine Off Ice Depot Inc. SAN LEANDRO CA Reserve Branchinement and Leastine Off Ice Depot Inc. SAN LEANDRO CA Reserve Branchinement and Leastine Off Ice Depot Inc. SAN LEANDRO CA Reserve Branchinement and Leastine Off Ice Depot Inc. SAN LEANDRO CA	SAN FRANCISCO CA 08/01/9		ROC NUMBER 03907			
If I ce Depot Inc. SAN LEANDRD CA Conservant for Annual Service	DEN MADGADE DUARDE	\$272.34	S/E # 5045718008	ORA	ace	\$173.1
OE/14/92 860025494 OE/21/92 327173088 Service Enteriorment and Levation OE/21/92 327173088 Off Toel Debot Inc. SAN LEANDRD CA Assure of Debot Inc. SAN LEANDRD CA Assure of Debot CA Review of Debits			TARGET STORES SAN	the second s	CA	
Office Depot Inc. SAN LEANDRO CA TARGET STORES SAN LEANDRO CA Annual of Charge	06/14/92	860028494	COLUMN STREET,	06/21/92		
	DOT INC. SAN LEANDRO CA		TARGET STORES S	AN LEANDRO	CA	
				ISE		
ROC NUMBER 860028494 ROC NUMBER 04791	NUMBER 860025494		ROC NUMBER 04791			
S/E # 5045789781 T07AL DNAE DNAE T07AL DNAE S/E # 5045716008 T07AL DNAE DNAE S/E # 5045716008	TOTAL CHASE	\$118.91	5/E # 5045718008	Onei	AGA	\$75.7

DANKOS AMOUNT

\$70.14

ENORA B. FULANI FOR PRESIDENT 200 WEST 72ND STREET, SUITE 30 NEW YORK, NY 10023 6698 résican Express and swen hundred elliven F76/2 571 1.337/200 5711.76 ANALGAWATED BANK OF NEW YORK NOT 197 EE00350:13 791 31031541 2 3

The Gold Card' Summary of Account

Card Member Name

MARGARET E TANZOSH

A Los a second data

Closing Date 08-26-92 100000

If you have a question about your account, call 1-800-327-2177 (24 hours/7 days). FOR FAST BALANCE AND PAYMENT INFORMATION, CALL OUR AUTOMATED SERVICE AT 1-800-292-AMEX USING A TOUCH TONE PHONE. PLEASE HAVE YOUR ACCOUNT NUMBER READY.

\$5,837.8	\$31.00	lew Card Balance (A) \$5,806.88		Card Payments/Credits \$2,335.25		Previous Card
P 1	3MT					
Gredits	Charges		redits	Listing of Charges and (Item No.	Amex Ref. No.
1,840.1		00 08/24	RECVD - THANK	1.872.10 PYMT		831237-0 831237-0
256.8	and the state	08/24		PAYMENT RECEIVE		831237-0
200.2	322.59	07/15/92	AL CAR RENTAL	NATIONAL CAR RE FD247050 NATIO	001	495212-4
	322.59	MN 07/15/92		NATIONAL CAR RE FD247083 NATIO	002	495212-4
		CA	LOS ANGELES	FEDERAL EXPRESS	003	501222-4
MT	9.00-	08/04/92 CA	LOS ANGELE	482035027 1 STA AVIS RENT-A-CAR	004	495232-4
	169.74	08/17/92 MN	TAL MINNEAPOLIS	R/A# 865874472 NATIONAL CAR RE	005	495233-4
	195.04	08/12/92 CA	3178SEAL BEACH	F1936335 NATIO RADIO SHACK 01	006	499233-4
47	75.37-	S 08/19/92	ONIC ACCESSORIE	000065803 ELECT NATIONAL CAR RE	007	495234-4
	322.59	07/29/92 MN		F1931866 NATIO NATIONAL CAR RE	800	495234-4
	335.58	07/29/92	AL CAR RENTAL	F1931870 NATIO	009	495239-4
	312.82	08/12/92	AL CAR RENTAL	F1936324 NATIO		1.00
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2.335.25	3,563.64	PAGE TOTAL				1.1.1.1.1.1.1.1

Payments or credits received after closing date above will appear on next month's statement.

Enroll in ConnectPlus(SM) with MCI to use the Card a as calling card and get a \$5 bonus credit. Call MCI at 1-800-688-0052 today!

Please see reverse side for important information regarding certain types of charges.

,	Amex Rel. No.	Item No.	Listing of Charges and Credits		Charges	Creditt
0	038234-1 064237-1 500217-1 501226-1 500230-1 500230-1 199233-1	015 016 017 018	RENT A WRECK OF PORTLAND TIGARD O INV#109246 HAMPTON INN OMAHA/CENTRAL OMAHA M INV#507420 ALASKA AIRLINES ANCHORAGE TKT# 0272105435089 VILLAGE INN PORTLAND 000170601 FOOD-BEV DELTA AIRLINES PORTLAND TKT# 0062162527823 DELTA AIRLINES PORTLAND TKT# 0062162527824 ALAMO RENT-A-CAR INC OMAHA 548424494 ALAMO RENT-A-CAR INC		437.85 113.74 426.00 10.75 303.00 303.00 327.48	ΤW
	199234-1 199234-1	019 020	ALAMO RENT-A-CAR INC OMAHA 548424494 ALAMO RENT-A-CAR INC ALAMO RENT-A-CAR INC OMAHA 548424563 ALAMO RENT-A-CAR INC	08/20/92 NE 08/20/92	.46 320.96	
				CARD 101	3,741.56	. (
				AGE TOTAL	2,243.24	.(
			ACCO	DUNT TOTAL	\$5,806.88	\$2,335.2
					2	

Line of Credit Activator	021000306 tivator Exp. Date 09-24-92	19	001-003
Order of American Express Tra	avel Related Services Com	pany, Inc.	\$
Please be sure the amount you fill in does not exceed the amount available in your line of credit. Your Line of Credit at CHEMICAL BANK	Amount	must be greater than \$100.	Dollar
NY. NY. will be charged the amount you have filled in above. 0000 2 040388 52	17984009521801	Card Member Signature	
A REAL PROPERTY AND A REAL PROPERTY A	How to use the Line of Credit		
You can pay all or a partion of your Gold Card bill by taking an advance from your Line of Credit. By returning the showe form to American Express you are authorizing us to debit your Line of Credit for the amount indicated. Your Gold Card financial institution will bill you directly for the savance in accordance with the terms previously	 Determine and fill-in the amount of the bi- wish to transfer to your Line of Credit. Youse the Activator to pay all or a portion of Gold Card bill. If using the activator to p- portion of your bill, enclose a personal cha- pay the balance. NOTE: The activator an cannot exceed the amount available in you 	your ays 6. Record the transit to available Line nount r Line Desister	ted thereon. usaction below to update your
You can pay all or a partion of your Gold Card bill by taking an advance from your Line of Credit. By returning the showe form to American Express you are authorizing us to debit your Line of Credit for the amount indicated. <u>Your Gold Card</u> <u>Ginancial institution will bill you directly for the</u> <u>advance in accordance with the terms previously</u> <u>disclosed</u> to you by that institution. Dishonored Activators If this Activator is not honored by your financial institution, the amount will be rebilled to your Bold Card account. Your Gold Card account may	 Determine and fill-in the amount of the bi wish to transfer to your Line of Credit. Youse the Activator to pay all or a portion of Gold Card bill. If using the activator to portion of your bill, enclose a personal chapay the balance. NOTE: The activator an cannot exceed the amount available in you of Credit. Contact the financial institution on the activator to confirm the amount available Sign the Activator. Sign the Activator. If using the activator to pay a portion of y 	ou may ston date prin your ay a 6. Record the tran ek to available Line n listed allable. o Date o Line of Credit B scence.	usection below to update your of Credit.
What is a Line of Credit Activator? You can pay all or a partion of your Gold Card bill by taking an advance from your Line of Credit. By returning the above form to American Express you are authorizing us to debit your Line of Credit for the amount indicated. Your Gold Card financial institution will bill you directly for the advance in accordance with the terms previously disclosed to you by that institution. Dishonored Activators If this Activator is not honored by your financial institution, the amount will be rebilled to your Gold Card account. Your Gold Card account may also be charged a \$15.00 for to cover collection costs except where otherwise provided by applicable law. Please be sure to sign the Activator before you send it back.	 Determine and fill-in the amount of the bi wish to transfer to your Line of Credit. Youse the Activator to pay all or a portion of Gold Card bill. If using the activator to portion of your bill, enclose a personal chapay the balance. NOTE: The activator an cannot exceed the amount available in you of Credit. Contact the financial institution on the activator to confirm the amount available Sign the Activator. Sign the Activator. If using the activator to pay a portion of y 	ou may stion date prin your ay a 6. Record the tran wellable Line n listed allable. o Date o Line of Credit B our erence. o Activator Amou ur mit- o Available Balar	usection below to update your of Credit. Ialance
You can pay all or a partion of your Gold Card bill by taking an advance from your Line of Credit. By returning the above farm to American Express you are sutherizing us to debit your Line of Credit far the amount indicated. Your Gold Card financial institution will bill you directly for the advance in accordance with the farms previously disclosed to you by that institution. Dishonored Activators If this Activator is not honored by your financial institution, the amount will be rebilled to your Gold Card account may also be charged a \$15.00 fee to cover collection costs except where otherwise provided by splicable law. Please be sure to sign the Activator	 Determine and fill-in the amount of the biwish to transfer to your Line of Credit. You use the Activator to pay all or a portion of your bill, enclose a personal chepay the balance. NOTE: The activator to proton of your bill, enclose a personal chepay the balance. NOTE: The activator to of Credit. Contact the financial institution on the activator to confirm the amount avoid of Credit. Contact the financial institution on the activator to confirm the amount avoid Credit. Contact the financial institution on the activator to confirm the amount avoid Credit. Contact the financial institution on the activator to confirm the amount avoid Credit. Contact the financial institution of the activator. Sign the Activator. If using the activator to pay a portion of y Gold Card bill, enclose a check for the diff. Return the top portion of the activator, yo personal check (if partial payment) and retance portion of your statement to America Express. CCOUNT KEY "E" FOR SIGN & TRAVEL. 	ou may stion date prin your ay a 6. Record the tran wellable Line n listed allable. o Date o Line of Credit B our erence. o Activator Amou ur mit- o Available Balar	ted Elereon. usection below to update your of Credit. lalance int tee

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Fi	nance Charge Sch	edule	ANNUAL	Minimum Pay	ment includes	Payment Due Date	. 09-20-92
Balance(s) to Which Rate Applies	Average Daily Balance	Monthly Periodic Rate	PERCENTAGE	Past Due Amount	This Month's Payment		
ALL	1116.33	1.29%	15.50%	.00	31.00	Payment	\$31.00

Important Sign & Travel Account Information

Arrendment to Minimum Payment Terms

Prior to January 1, 1990, the Sign & Travel Account Agreement (the "Agreement") required a Minimum Payment of 1/24th of the New Balance of your Sign & Travel
Account, but not less than 520 of the entire New Balance if less than 520. If you wish, you can always pay more than the Minimum Payment.

Finance Charge

To activulate the Finance Charge, we multiply the Daily Periodic Rate by the Average Daily Balance during the Billing period. Then we multiply the product by the
mumber of days in the billing cycle. To get the entire New Balance, we take the beginning balance of the Sign & Travel Account each day, add any new Sign &
Travel Charges and accured and unpaid Finance Charges (except such Finance Charges will not be included for residents of CQ. 1A, ME, NC and PR), and subtract any
payments or credits. Then we add up the daily balance for the billing opriod and divide by the number of days in the billing opriod. This gives us the Average Daily
Balance. This method of computation of the Average Daily Balance results in compound interest (except for residents of CQ. 1A, ME, NC and PR).

Payment
Main your payment in the enclosed envelope or to the address for payments listed on the back of your Card Account statement. Remember, your payment such Balance Charges
Main your payment is the Minimum Amount Due or the Total Account. If you went to pay more than the Minimum Payment (up to the entire Sign & Travel Meximum
Meximum Payment is the resident Balance Charges
The Account. If you went to pay here the larges amount and the average Baily balance for the billing cycle of the stilling period.

Meximum Payment is the resident Balance of your Sign & Travel Account. If you went to pay more than the Minimum Payment. Remember, your payment so that Amount Payment.

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NATIONAL CAR RENTAL MINNE	APOL IS	MN	
LOCATION		DATE/TIME	a. New York
RENTAL LOS ANGELES	CA	07/15/92	AGREEMENT FD247050
RETURN LOS ANGELES	CA	07/29/92	TR# 212302
S/E # 7223820044		TOTAL CHANGE AMOUNT	\$322.

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LOCATION		DATE/TH	ME
RENTAL LOS ANGELES	CA	07/15/92	AGREEMENT
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		Change a MDLW*	\$322.59
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er Extentionment per Location IS RENT-A-CAR LOS AN Per Extentionment per Location VIS RENT-A-CAR LOS A er al Compe LOCATION RENTAL	Date of C Q8/17, ANGELE CA	Славій Амбрич ⁴ СА СА СА ОАТЕ/ТІК О8/14/92	S 169 . 74 Herman Cada Approva

Closing Date Page 4 of 6

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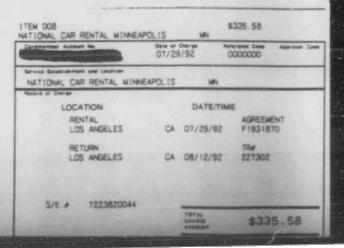
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NATIONAL CAR RENTAL WIN	NEAPOLIS	IN	a sector of the
LOCATION		DATE/TIME	
RENTAL LOS ANGELES	CA	08/12/92	AGREEMENT F1936335
RETURN LOS ANGELES	CA	08/19/92	TR# 233302
S/E # 7223820044		TOTAL	
		AMDUNT	\$195.04
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00 5074[20]	113.74 American Express* Cards

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PASSENGER TICKET	1		** 216000
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DELTA AIR LINES INC.	T	PORTL	AND OR
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T* LAS VEGAS NV	DL	BC	America Like Dery 2 5/1200 A.D
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PASSENGER TICKET S/E # 7992701284			
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LAND RENT-A-CAR INC OMAHA	Data of Ch	NE	\$327.48
	08/19/		081992
ALAMO RENT-A-CAR INC OMAHU		NE	
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RENTAL	NE		AGREEMENT
RETURN	~	00/00/00	0 548424494 TR#
		08/19/90	
P./2	14		
S/E # 1263901340		TOTAL CHARGE AMOUNT	\$327.48
B. a. Sun Bak			
TEM 020			\$320.96
LAMO RENT-A-CAR INC DMAHA	Date of Chi OR/20/0		Anternes Calls Aggroup 1 082092
Service Establishment and Location	08/20/9	26	JOLVES
ALAMO RENT-A-CAR INC OMAHA		NĒ	
LOCATION		DATE/T	IME
RENTAL	NE (00/00/00	AGREEMENT 548424563
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TH SALT LAKE CITY UT	OL	80	303.00
TH LAS VEGAS NV	a	80	
*			America Liter Only 23029962
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ITEM 019 ALAMO RENT-A-CAR INC OMAHA		NE	\$0	46	
Called Statement Str	08/20		0820		Approval Com
Service Excelosionment and Lassevan ALAMO RENT-A-CAR INC OMAHA		N	E		
Assard of Charge		10000		Tank?	1.1.1
LOCATION		DATE/TI			
RENTAL OMAHA	NE	00/00/0		GREEME) 484244	
RETURN		08/20/1		8# 34515	
S/E # 1253901340		TOTAL DIAME			5.46

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Closing Data Page 5 of 8 닄 Card Member Nama Account Number The Gold Card MARGARET E TANZOSH EB801; 208-25-92 84 \$1 ITEM 009 NATIONAL CAR RENTAL WINNEAPOLIS \$312.82 ----------Only of the 08/12/92 0000000 NATIONAL CAR RENTAL MINNEAPOLIS MN LOCATION DATE/TIME AGREEMENT F1936324 RENTAL LOS ANGELES CA 08/12/92 RETURN LOS ANGELES TR# 238302 CA 08/25/92 S/E # 7223820044 TOTAL DHARDS \$312.82 ITEM 010 NATIONAL CAR RENTAL ANDHORAGE AK \$1,207.92 5815315 11/1E 08:12:060 CPT7121 妆 AMONINT ALL THE COPY FEAT YOUR RECOND CHE STL HNCH Æ EXPRESS 22 2 à 1005261800041 120°.92 CAP1 YINX 텳 DESCRIPTION 1MM 福しついるいたけ NUMBER OF 8 Gertherter and the field deal something of the field deal SALES DRAFT 641E 07+21-92 LAT CARL buch CLASS d Fa ACC L ITEM 011 NATIONAL CAR RENTAL AND-ORAGE AK \$290.40 5315439 TIRE 0611212114 AK Jan Uni 1 2 AMOUNT AUCH FOR YOUR RECON EXPRESS m 194 26 00551300047 215 BLDEGON OTAL. 뾃 **DESCREPTION** 1061-11-1 3 Cup AMERICHN SALES DOAP1 01/50/92 NHTI BNAL RETAULTHE C -huc CLABB ACC13 EXP APPR 1 AND 22 ITEM 012 RENT & WRECK OF PORTLAND TIGARD OR \$437.85 American Express® Cards 05/91 THRU 03/94 9 77 13 334 707 JEFF WILLIAMSON 37 4 13083 5272 .: ETT A URECK PORTLAND WEST 065963736 5363900093 t 261510 OR 32 3 ž 41,185 21,1% 5 Cir. Sumi Za TOTAL 00 109246

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LENGRA B. FULANI FOR PRESIDENT 7./24 encan Inon riscontine hundred ninety + " /xx AWALGAWATED BANK OF NEW YORK JUNOT NEGOTIABLE 1710 Broadway, New York, N.Y. 10019 -005909" 10260033791: 31031541" Maria Part The Contraction of 0 5 M 12 . 30 318.01 0 318-01 192.14 ~ 192.1. M 192 -12 5 175 0 162-37 234 - 58 234 . 56 . 234 . 56 234.36

The Gold Card Summary of Account

Account Number

Closing Date 07-08-92

If you have a question about your account, call 1-800-327-2177 (24 hours/7 days). FOR FAST BALANCE AND PAYMENT INFORMATION, CALL OUR AUTOMATED SERVICE AT 1-800-292-AMEX USING A TOUCH TONE PHONE. PLEASE HAVE YOUR ACCOUNT NUMBER READY

Previous Balance \$2,844.56			Credits/Payments \$2,844.56	New Charges \$3,23	9.92	New Balance \$3,239,92
	Amex Rel. No.	Item No	Listing of Charges and Credits	1	Charges	Credits
	831190-0		PAYMENT RECEIVED - THANK YOU	07/08		2,844.56
	501167-1	001	BUDGET RENT A CAR SAN FRANCISCO 002003838 BUDGET RENT A CAR	CA 06/12/92	318.01	+
	501167-1	002	BUDGET RENT A CAR SAN FRANCISCO 002003839 BUDGET RENT A CAR		318.01	
	501167-1	003	BUDGET RENT A CAR SAN FRANCISCO 002004550 BUDGET RENT A CAR		192.14	
	501167-1	004	BUDGET RENT A CAR SAN FRANCISCO 002004551 BUDGET RENT A CAR		192.14	
	501167-1	005	BUDGET RENT A CAR SAN FRANCISCO 002004552 BUDGET RENT A CAR		192.14	11
	501167-1	006	BUDGET RENT A CAR SAN FRANCISCO 002004553 BUDGET RENT A CAR		175.41	1
	501168-1	007	BUDGET RENT A CAR SAN FRANCISCO 002005542 BUDGET RENT A CAR		62.29	
	501171-1	008	800 FLOWERS INC WESTBURY 65507 512 GIFT ITEMS	NY 06/18/92	48.95	maistás
	501175-1	009	BUDGET RENT A CAR SAN FRANCISCO 002005538 BUDGET RENT A CAR		167.37	1. austac
	501181-1	010	BUDGET RENT A CAR SAN FRANCISCO 002005535 BUDGET RENT A CAR		234.36	7
	501181-1	011	BUDGET RENT A CAR SAN FRANCISCO 002005537 BUDGET RENT A CAR		234.36	
	501181-1	012	BUDGET RENT A CAR SAN FRANCISCO 002005540 BUDGET RENT A CAR		234.36	
	501181-1	013	BUDGET RENT A CAR SAN FRANCISCO 002005544 BUDGET RENT A CAR		234.36	
	501181-1	014	BUDGET RENT A CAR SAN FRANCISCO 002005940 BUDGET RENT A CAR		234.36	Succession of
				AGE TOTAL	2,838.26	2,844.56

Payments or credits received after closing date above will appear on next month's statement.

Frequent Travelers - Earn more miles faster. For information on enrolling in the Membership Miles(SM) program call 1-800-338-4978.

Please see reverse side for important information regarding certain types of charges

Credits	Charges	Listing of Charges and Credits	Item No.	Amex Ref. No.
	234.36	BUDGET RENT A CAR SAN FRANCISCO CA	015	501181-1
		BUDGET RENT A CAR SAN FRANCISCO CA	016	501181-1
	66.92	002006693 BUDGET RENT A CAR 06/26/92 BUDGET RENT A CAR SAN FRANCISCO CA	017	501181-1
	66.92	002006695 BUDGET RENT A CAR 06/26/92 BUDGET RENT A CAR SAN FRANCISCO CA	018	501182-1
	33.46	002007067 BUDGET RENT A CAR 06/28/92		
.0	401.66	PAGE TOTAL		
\$2,844.5	\$3,239.92	ACCOUNT TOTAL		

ITEM OCI \$318.01 BUDGET RENT & CAR SAN FRANCISCO CA

Cardinamine Astmut Im	06/12	/92	derena Cinte Agersen) Cen 02003838
BUDGET RENT & CAR SAN	FRANCISC	D CA	
Ascord of Diarga			
LOCATION		DATE/TIME	
RENTAL SAN FRANCISCO	CA	05/24/92 1941	AGREEMENT 002003838
RETURN SAN FRANCISCO	CA	06/12/92	TR# 162146
	901		
S/E . 5043933134 PLAFKIN		TOTAL CHARGE AMOUNT	\$318.01

ITEM 003 BUDGET RENT & CAR SAN FRANCISCO \$192.14 CA 02004550 American's Carls Dete at Charge OB/12/92 next and Lo BUDGET RENT & CAR SAN FRANCISCO CA Assant of Charge LOCATION DATE/TIME RENTAL SAN FRANCISCO AGREEMENT 002004550 CA 08/01/92 807 RETURN TR# SAN FRANCISCO CA 06/12/92 901

S/E # 5043933134 TUTAL GOLDEN M SHARE \$192.14

ITEM 005 BUDGET RENT & CAR \$192.14 SAN FRANCISCO CA Approval Care Aptarenes Code 02004552 Carementer Ar 06/12/92 Service Extentionment and La BUDGET RENT & CAR SAN FRANCISCO CA Record of Charge LOCATION DATE/TIME RENTAL SAN FRANCISCO AGREEMENT 002004552 CA 06/01/92 811 RETURN SAN FRANCISCO TR# 182146 CA 08/12/92 901

\$192.14

S/E # 5043933134 GOLDEN M ITEM 002 BUDGET RENT & CAR SAN FRANCISCO \$318.01 CA PART PER 06/12/92 02003839 wal Cas vien Sat BUDGET RENT & CAR SAN FRANCISCO CA Sacard of Charge LOCATION DATE/TIME RENTAL SAN FRANCISCO AGREEMENT 002003839 CA 05/24/92 1945 RETURN SAN FRANCISCO TR# 162146 CA 06/12/92 901 S/E . 5043933134 PLAFKIN MARSHA TOTAL CHARGE AMOUNT \$318.01

Earsmambs	Access in	D6/12		02004551	Approval Co
	RENT A CAR SAN	FRANCISC	10 CA		
Bacana at 1					
	LOCATION		DATE/	TIME	
	RENTAL SAN FRANCISCO	CA	06/01/9	AGREEM	
	RETURN			TR#	
	SAN FRANCISCO	CA	08/12/9	182148	
		901			
S/	E # 5043933134		TOTAL		

ITEM OOB BUDGET RENT & CAR SAN FRAN	CISCO	CA	\$175.41	
Cardinamber Account No	Dein # 05/12		02004563	Appreval Cas
Service Establishment and Lacation BUDGET RENT & CAR SAN FR	ANCISC	to CA	100	
Resort of Charge				
LOCATION		DATE/T	ME	
RENTAL			AGREEME	INT
SAN FRANCISCO	CA	06/01/92 814	0020045	53
RETURN			TR#	
SAN FRANCISCO	CA	06/12/92	182146	
	901			
S/E # 5043933134			19614	
PLAFKIN MARSHA	1	TOTAL CRAAKER	\$17	5.41

The Gold Card Card Member Name

TEM 007 BUDGET RENT & CAR SAN FRAN	C1500	CA	\$62.29	
Caremember Attanut Ms	Date of	Diarge	Reference Code	Approval Cen
NUMBER OF STREET, STRE	C8/15	/92	02005542	
BUDGET RENT & CAR SAN FR	ANC ISC	D CA		
Actual of Darge		DATE/TIM	E	
RENTAL SAN FRANCISCO	CA	06/12/92 926	AGREEM	
RETURN SAN FRANCISCO	CA	06/15/92	TR# 158146	
	801			
S/E + 5043933134 PLAFKIN MARSHA		TOTAL DIARGE AMOUNT	\$6	2.29

TEM 009 BUDGET RENT & CAR SAN FRANCISCO

BUDGET RENT & CAR SAN FRANCISCO CA

Service Late

Reports of Charter

LOCATION

RENTAL

SAN FRANCISCO

RETURN SAN FRANCISCO

S/E # 5043933134

PLAFKIN MARSHA

\$167.37

02005538

AGREEMENT

002005538

\$167.37

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Approval Cede

CA

DATE/TIME

922

CA 06/12/92

CA 06/22/92

TUTAL DNAROE

901

06/22/92

TEM 008 00 FLOWERS INC	NESTBURY		NY	\$48.95	
Caramandar Assault In.		Data at Sharga		Referance Code	Appreval D
a far the state	-	08/18/92	_	85507 512	
BOO FLOWERS INC	WESTBUR	RY	NY		Sec. 1
facare of Diarga					
GIFT ITEMS					
ROC NUMBER OOT	99609924				
S/E # 6316742162					
		TOT CHA			48.95

Accent Number

Closing Date Page 3 of 4 FB80120

ITEM 010 \$234.38 BUDGET RENT & CAR SAN FRANCISCO CA

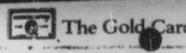
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CA	06/12/92 918	A0REEMENT 002006535
CA	06/26/92	TR# 178146
901		
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	CA	CA 06/26/92 901

Caraman	Aller Aller	0em # 06/26		2005537
· · BUOGE	Released and Langtian ET RENT A CAR SAN FR	ANCISC	D CA	
Augurd a	LOCATION		DATE/TIME	
	RENTAL SAN FRANCISCO	CA	06/12/92 921	AGREEMENT 002005537
	RETURN SAN FRANCISCO	CA	08/28/92	TR# 176146
		901		
	S/E # 5043933134 PLAFKIN MARSHA		TOTAL DHARDE AMOUNT	\$234.36

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Service Establishment and Location BUDGET RENT & CAR SAN FR	ANC ISC	10 CA		
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LOCATION		DATE/TIME		
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RETURN			TRU	
SAN FRANCISCO	CA	08/28/92	175148	
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S/E # 5043933134		1. 1. 1.	Contraction in	
PLAFKIN MARSHA		107AL	\$23	4.36

ITEM 012 BUDGET RENT & CAR SAN FRANCISCO \$234.35 CA Mr Ap -Date of Diarys 06/26/92 02005540 Approval Cede Carse -BUDGET RENT & CAR SAN FRANCISCO CA Record of Charge LOCATION DATE/TIME RENTAL SAN FRANCISCO AGREEMENT 002006540 CA 06/12/92 925 RETURN TR# 178145 SAN FRANCISCO CA 06/26/92 901 S/E # 5043933134 DHARDE AMOUNT PLAKIN MARSHAG \$234.36

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SAN FRANCISCO	CA	06/15/92 825	0020059	40
RETURN			TRe	
SAN FRANCISCO	CA	08/28/92		
	901			
S/E # 5043933134			State of the second	1912
MARSHA PLAFKIN		TOTAL	100	1.36



ď	Card Member Name	
•	MARSHA PLAFKIN	

ITEM 015 BUDGET RENT & CAR	SAN FRANCISCO	CA	\$234.36
Cardmannay Areast Str.	Bata al Char	-	Reference Code

BUDGET RENT & CAR SAN	PRANC I SC		2005941
LOCATION		DATE/TIME	
RENTAL SAN FRANCISCO	CA	08/15/92 830	AGREEMENT 002005941
RETURN SAN FRANCISCO	CA	06/26/92	TR# 176146
	901		
S/E # 5043933134		TOTAL	
M PLAFKIN		ANDUNT	\$234.36

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NAMES OF A PARTY AND	06/26	5/92 0	2006693
BUDGET RENT & CAR SAN FR	ANCISC	CA CA	
Receive of Charge			
LOCATION		DATE/TIM	6
RENTAL SAN FRANCISCO	CA	06/22/92	AGREEMENT 002006693
RETURN SAN FRANCISCO	CA	06/26/92	TR# 178146
	901		
S/E # 5043833134 PLAFKIN MARSHA		TOTAL DHARCE AMOUNT	\$66.92

\$33.46

Closing Date

07-08-92

F88012

392

TEM 017 BUDGET RENT & CAR SAN FRAN	cisco	CA	\$66.92	
AND DESCRIPTION OF	9ete er 0 06/25	/92	C2008895	Appreval Cade
Service Establishment and Lanction BUDGET RENT & CAR SAN FR	ANCISC	O CA		
Record of Charge			_	
LOCATION		DATE/TIM	E	
RENTAL SAN FRANCISCO	CA	06/22/92 913	AGREEME 0020066	
RETURN SAN FRANCISCO	CA	06/26/92	TR# 176146	
	901			
S/E + 5043933134 PLAFKIN MARSHA		TOTAL CHARGE AMOUNT	\$6	6.92

arenember Account No.	08/28	/92 0	2007067 Approval Co
BUDGET RENT & CAR SAN F	RANCISC	X) CA	
fectore of Diarge			
LOCATION		DATE/TIM	E
RENTAL SAN FRANCISCO	CA	06/26/92	AGREEMENT 002007067
RETURN SAN FRANCISCO	CA	06/28/92	176146
	1001		
S/E # 5043933134 PLAFKIN MARSHA	4	TOTAL CHARGE AMOUNT	\$33.46

ITEM 018

M 00 M 30 0 ~ 3 7 0 1 5

re analysis of Staff Advances under 11 C.F.R. 116.5 for--Pulani

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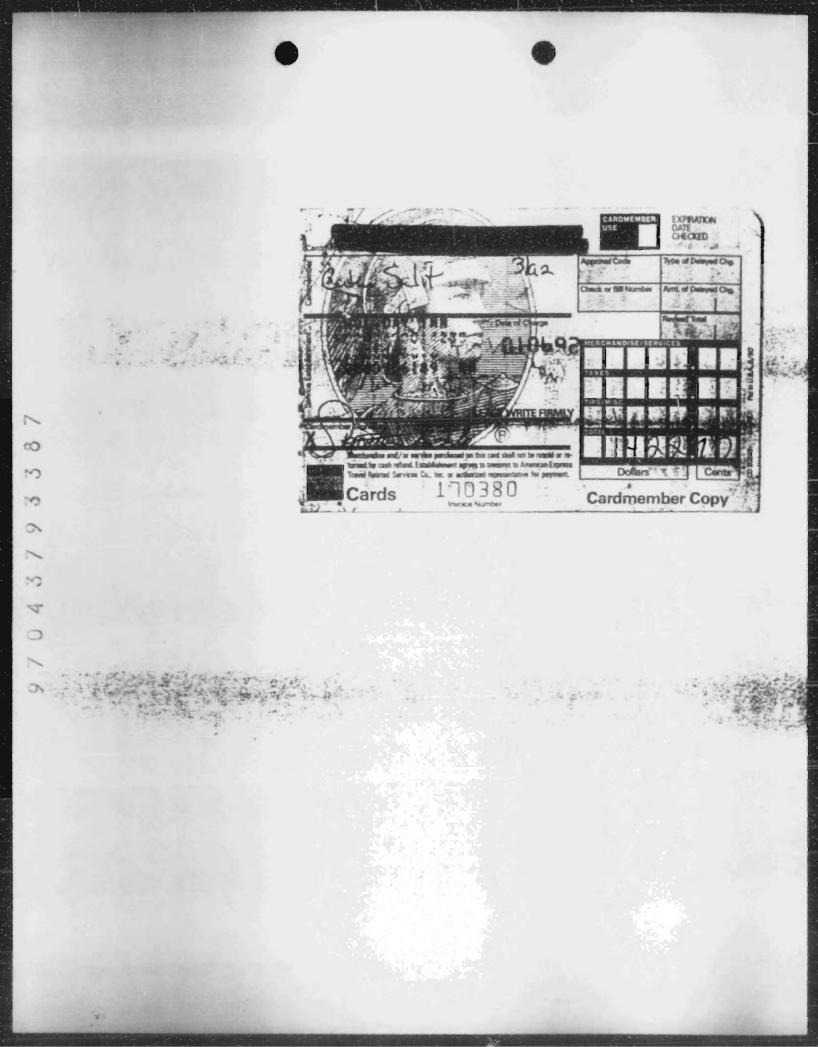
Run Date: 04/18/1994

	W/S					W/8		W/8				
	Vch		W/S Cont	W/S Contr	W/8		W/S Date		W/S Contr	W/S Run	W/S Excess	W/S Exc Bel
w/s Mame	NO	Inc Date	Calc Dte	Inc Amt	O/S ARE	cde		0/5	Amts	Contr Bal	Amount	Aft Reimb
Mershe Flafkin				**********								
nersus risteri		05/15/91 08/14/91		50.00	50.00	7		0	50.00	-950.00		
		09/04/91		35.00	85.00	7		0	35.00	-915.00		
		09/11/91		50.20	95.00 145.20	5	10/04/91		0.00	-915.00		
		09/17/91		16.19	161.39	4	10/04/91		50.20	-864.80		
		09/17/91		77.99	239.38	à	10/04/91 11/08/91	17	16.19	-848.61		
		09/26/91		1386.66	1626.04	4	01/17/92		77.99	-770.62		
	13	10/04/91	10/04/91	-77.99	1548.05	1	V.17 . 11 9 .	0	0.00	616.04 548.05	616.04	
		10/15/91		75.97	1624.02	4	01/28/92		75.97	624.02	548.05	548.05
	34	10/16/91	10/16/91	75.97	1699.99	4	01/28/92		75.97	699.99	699.99	
	29	11/08/91	11/08/91	-85.97	1614.02	1		0	0.00	614.02	614.02	614 03
		11/08/91		200.00	1814.02	7		0	200.00	814.02	814.02	614.02
	1	11/11/91	11/11/91	997.26	2811.28	4	01/28/92		997.26	1811.28	1811.28	
		11/14/91		25.00	2836.28	7		0	25.00	1836.28	1836.28	
		11/20/91		6.50	2842.78	4	01/28/92		6.50	1842.78	1842.78	
		11/22/91		25.00	2867.78	7		0	25.00	1867.78	1867.78	
		11/27/91		76.00	2943.78	7		0	76.00	1943.78	1943.78	
		12/02/91		25.00	2968.78	7		0	25.00	1968.78	1968.78	
		12/09/91		990.72	3959.50	6	02/22/92	45	0.00	1968.78	1968.78	
		12/11/91		15.00	3974.50	7		0	15.00	1983.78	1983.78	
	24	12/12/91	12/12/91	75.00	4049.50	7		0	75.00	2058.78	2058.78	
		12/13/91		38.96	4088.46	4	02/22/92	71	38.96	2097.74	2097.74	
		12/16/91		90.39	4178.85	4	02/22/92	68	90.39	2188.13	2188.13	
	25	12/16/91	12/16/91	31.75	4210.60	7		0	31.75	2219.88	2219.88	
		12/19/91		178.53	4389.13		02/22/92	45	0.00	2219.88	2219.88	
		12/26/91		- 38.96	4350.17	1		0	0.00	2180.92	2180.92	2180.92
		01/03/92 01/03/92		-90.39	4259.78	1		0	0.00	2090.53	2090.53	2090.53
		01/03/92		11.00	4270.78	4	02/22/92		11.00	2101.53	2101.53	
		01/06/92		15.00	4285.78	7		0	15.00	2116.53	2116.53	
		01/07/92		61.16	4346.94	4	02/22/92		61.16	2177.69	2177.69	
		01/07/92		51.85	3349.68	1		0	0.00	1180.43	1180.43	1180.43
		01/07/92		47.20	3401.53		02/29/92		51.85	1232.28	1232.28	
		01/07/92		402.69	3448.73	0	02/29/92		0.00	1232.28	1232.28	
		01/08/92		106.67	3851.42	-9	02/29/92		0.00	1232.28	1232.28	
		01/14/92		-150.00	1958.09 3808.09	1	02/29/92	21	0.00	1232.28	1232.28	
		01/15/92		177.53	3985.62	6	02/29/92		0.00	1082.28	1082.28	1082.28
		01/17/92		-159.86	3825.76	-	02/29/96	0	0.00	1082.28	1082.28	
		01/19/92		277.12	4102.88	4	02/29/92		277.12	922.42	922.42	922.42
		01/19/92		277.12	4380.00	6	02/29/92		0.00	1199.54	1199.54	
	3	01/21/92	02/08/92	277,12	4657.12	6	02/29/92		0.00	1199.54	1199.54	
	2	01/28/92	01/28/92	-1216.45	3440.67	T		0	0.00	103.23	103.23	103.23
	31	01/31/92	01/31/92	-61.16	3379.51	1		Ö	0.00	103.23	103.23	103.23
	3	02/04/92	02/04/92	298.77	3678.28	4	02/29/92		298.77	402.00	402.00	193.23
	3	02/04/92	02/08/92	298.77	3977.05	6	02/29/92	21	0.00	402.00	402.00	
	32	02/05/92	02/05/92	86.00	4063.05	6	02/29/92	24	0.00	402.00	402.00	
	3	02/06/92	02/08/92	135.16	4198.21	6	03/31/92	52	0.00	402.00	402.00	
		02/18/92		93.04	4291.25	4	03/31/92		93.04	495.04	495.04	
		02/22/92		-1236.66	3054.59	1		0	0.00	246.33	246.33	246.33
		02/29/92		-2302.80	751.79	1		0	0.00	-334.21	4404.3.3	
		03/03/92		10.43	762.22	4	03/31/92	0.7	10.43	-323.78		
		03/09/92		373.01	1135.23	_6	05/01/92	53	0.00	-323.78		
		03/18/92		234.36	1369.59	4	05/01/92	44	234.36	-89.42		
		03/18/92		234.36	1603.95	4	05/01/92	44	234.36	144.94	144.94	
		03/18/92		234.36	1838.31	6	05/01/92		0.00	144.94	144.94	
	4	03/31/92	03/31/92	-373.01	1465.30	1		0	0.00	41.47	41.47	41.47

Hun Date: 04/18/1994

	W/5					W/S						
	Vch	W/S Cont	W/S Cont	W/S Contr	W/S		W/S Date	W/S	W/E Franks	11.6 m. m.		
W/S Name			Calc Dte	Inc Amt	0/S Amt		Reimb	0/5	W/S Contr Amts	W/S Run	W/S Excess	W/S Exc BB1
		*******					Nermo .	0/8	ABCS	Contr Bal	Amount	Aft Reimb
Marsha Plafkin		04/01/92		262.57	1727.87	4	05/01/92	30	262.57	304.04	304.04	
	5	04/01/92	04/01/92	262.57	1990.44	4	05/01/92	30	262.57	566.61	566.61	
	5	04/01/92	04/08/92	262.57	2253.01	6	06/01/92	54	0.00	566.61	566.61	
	32	04/03/92	04/03/92	-86.00	2167.01	T		0	0.00	566.61	566.61	144 41
	6	04/15/92	04/15/92	262.57	2429.58	- 4	06/01/92	47	262.57	829.18	829.18	566.61
	6	04/15/92	04/15/92	262.57	2692.15	4	06/01/92	47	262.57	1091.75	1091.75	
	6	04/15/92	05/08/92	262.57		6	06/01/92	24	0.00	1091.75	1091.75	
	5	05/01/92	05/01/92	-1490.79	1463.93	1		0	0.00	97.89	97.89	97.89
	6	05/01/92	05/01/92	290.78	1754.71	4	06/01/92	31	290.78	388.67	388.67	21.02
	6	05/01/92	05/01/92	290.78	2045.49	4	06/01/92	31	290.78	679.45	679.45	
	6	05/01/92	05/08/92	290.78	2336.27	6	07/03/92	56	0.00	679.45	679.45	
	7	05/20/92	06/07/92	500,00	2836.27	6	07/03/92	26	0.00	679.45	679.45	
	7	05/24/92	05/24/92	465.47	3301.74	4	07/03/92	40	465.47	1144.92	1144.92	
	7	05/24/92	05/24/92	465.47	3767.21	4	07/03/92	40	465.47	1610.39	1610.39	
	7	05/24/92	06/07/92	465.47	4212.68	6	07/03/92	26	0.00	1610.39		
	33	05/29/92	05/29/92	-10.43	4222.25	1		0	0.00		1610.39	1610.30
		05/29/92		10.00	4232.25	7		õ	10.00	1610.39	1610.39	1610.39
		06/01/92		-1660.05	2572.20	- î		0	0.00	513.69	1620.39	
		06/01/92		644.49	3216.69	4	07/03/92	32	644.49	1158.18	513.69	513.69
		06/01/92		166.49	1181.18		07/03/92	26	0.00		1158.18	
		00/07/92		137.17	3520.35	6	07/10/92	33	0.00	1158.18	1158.18	
		06/12/92		1387.85	4908.20	4	07/24/92	42	1387.85	1158.18 2546.03	1158.18	
		06/15/92		62.29	4970.49	4	07/24/92	19	62.29		2546.03	
		06/22/92		167.37	5137.86	4	07/24/92	32		2608.32	2608.32	
		06/26/92		1540.00	6677.86	4	07/24/92	28	167.37	2775.69	2775.69	
		06/28/92		33.46	6711.32	4	07/24/92	26	33.46	4315.69	4315.69	
		07/03/92		-2844.56	3866.76	1	011 641 76	0		4349.15	4349.15	
		07/07/92		184.10	4050.86	4	09/04/92	59	0.00	2773.72	2773.72	2773.72
		07/10/92		-93.04	3957.82	1	03/04/32	0	184.10	2957.82	2957.82	
		07/10/92		234.36	4192.18	÷	09/04/92	56	0.00	2957.82	2957.82	2957.82
		07/10/92		1406.16	5598.34	- 2	09/04/92	56		3192.18	3192.18	
		07/23/92		1522.92	7121.26	1	09/04/92	43	1406.16	4598.34	4598.34	
		07/24/92		-3190.97	3930.29	1	03104135	0	1522.92	6121.26	6121.26	
		07/24/92		451.92	4382.21	â	09/04/92		0.00	2930.29	2930.29	2930.29
		08/06/92		217.56	4599.77	1		42	451.92	3382.21	3382.21	
		08/06/92		1640.50	6240.27	- 2	09/04/92	29	217.56	3599.77	3599.77	
		08/13/92		133.91	6374.18	-	10/19/92	74	1640.50	5240.27	5240.27	
		08/20/92		1288.98	7663.16	-	10/19/92	67	133.91	5374.18	5374.18	
		09/01/92		425.01	8088.17		10/19/92		1288.98	6663.16	6663.16	
		09/03/92		468.72	8556.89	-	10/19/92	48	425.01	7088.17	7088.17	
	9			-5440.00	3116.89	1	10/19/92	46	458.72	7556.89	(7556.89	
		09/16/92		937.44		â	10/25/03	0	0.00	2116.89	2116.89	2116.89
the second s		10/01/92		251.10	4054.33	- 2	10/25/92	39	937.44	3054.33	3054.33	
		10/03/92		33.46	4305.43		10/25/92	24	251.10	3305.43	3305.43	
		10/15/92			4338.89	4	10/25/92	22	33.46	3338.89	3338.89	
		10/19/92		468.72	4807.61	4	12/06/92	1.2.2	468.72	3807.61	3807.61	
		10/25/92		-2534.18	2273.43	1		0	0.00	1273.43	1273.43	1273.43
		11/02/92		-1221.96	1051.47			0	0.00	51.47	51.47	51.47
		12/06/92	the second s	602.66	1654.13	1	12/06/92	34	602.66	654.13	654.13	
		11100/92	11100/31	-1071.38	582.75	1		0	0.00	-417.25		

NEW YORK, NY 10019 3039 1680.58 1-32/264 encan appress' isand six heindred. eign MAIGAMATED BANK OF NEW YORK N.Y. 10019-TIABLE n 3010-920+13-71004 1003039" ::026003379: - Ander Surface 3-3 3 5 00 N 2.00 1.00



Holiday Inn

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				01	154

A NUMBER OF				
	DATE REFERENCE	CHARGES	CREDIT	BALANCE DUE
				A DESCRIPTION OF THE OWNER OWNER OF THE OWNER OWNER OF THE OWNER
				1
01/04	LNG DIST	2.05		3
	FROM 5543 BALLINGA			
01/04	LNG DIST 1001	.50		
	FROM 5543 SALITICA			
01/04	ROOM	80.00		
	FROM 5547 BALLIT CA			
01/04	RM TAX . 1105, 1	6.40		3
	FROM 5547 SALUTIDA			3
01/04	ROOM 1206. 1	80.00		1
01/04	FROM 5545 SALIT, CA			-
01/04	RM TAX 1206, 1	6.40		
01/04	FROM 5545 SALITICA ROOM 1208, 1			
01/04		195.00		1
01/04	RM TAX 1208, 1 LNG DIST L001-212	15.60		.1
0 4 7 0 4	FROM 5547 SALITICA	1.81		
01/04	LNG DIST L001-212	Charles and		3
	FROM 5547 SALIT,CA	2.70		
01/04	TRANSIT	Bandan		1
	FROM 5559 BRAUN, BE	1.40.00		
01/04	RM TAX	A Long Street		
	FROM 5559 BRAUN, BE	Contraintention		
017.54	LNG DIST LOO1-213			1
	FROM SEAT SALTT CALLS	and the second second		
	LNG 1195 L001-210			1
	SALIT.CA			
24 240	240 DESE L001-212			
	SAS SALITICA			1
01.65	L001-212			
	AS SALIT CAR			
	L001-317			
	SALIT,CA			
	L001-713	1 3.46		
	I SALIT,CA			

Engree that we are a structure could wave during a pre-club held personally when a the event that the indicated person company or a security and the task in the fast an our authenal dampin. This is pre-mail all changes contained in this account processory and any contained in requests for our excitor personal pre-club within the days after my departure.



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	DATE	REFERENCE	CHARGES	CREDIT	BALANCE DUE
2.1					
01/04	LNG DIST FROM 5543		.50		
01/04	LNG DIST	L001-212	3.77		
01/04	LNG DIST FROM 5543	L001-212	2.70		1
	CAFE CHG FROM 5545	225270	12.67		
	LNG DIST FROM 5545	L001-603	.50		
01/05	LNG DIST FROM 5545	L001-212	1.75		
01/05	LNG DIST FROM 5545	L001-212	1.75		
01/05	LNG DIST FROM 5545	L001-212	2.88		
01/05	LNG DIST FROM 5543	L001-603	1,20		
01/05	LNG DIST FROM 5543	L001-603	1.15		
01/05	LNG PIST	L001-603			
01-05	LNG DIST FROM 5547	L001-212	4.30		
01-05	LNG DIST	L001-212	201.75 T		
	LAG PIST CAFE CHG	22220873			
	Filen 5543	SALIT, CA			
	-un 1543				
		SALIT, CA			
	7. 7	SALIT,CA			

Lagree that my splinty for this bill is not waived and agree to be field before ally table in the event that the indicated person, odmpany of asset after thes to pay for any of the full amount of these thanges. I also agree that all changes contained in this account are correct and any departer or requests the obplets of imarges must be made within five days after my departure.

7043793389



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INVOICE

SALENA STRUCT

DATE	REFERENCE	CHARGES	CREDIT	BALANCE DUE
Second and the second				
AL LAS LNS STOT		~		1.1.6
01/05 LNG DIST 01/05 LNG DIST	29410800	3.14		
FROM 554		.50		
01/05 LNG DIST		1.77		
FROM 5547		1.11		
01/05 LNG DIST		.50		
FROM 5547		****		
01/05 LNG DIST		1.75		
FROM 5547				
01/05 LNG DIST		.50		
FROM 5543				
01/05 LNG DIST		.50		
FROM 5547	SALIT, CA			
01/05 LNG DIST	L001-603	.50		
01/05 CAFE CHG	225652	8.98		
FROM 5545				
01/05 LNG DIST		5.32		
FROM 5547				
01/05 LNG DIST		.50		
FROM 5547				
01/05 LNG BIST -		.50		
FROM 5547				
01/05 LNG DIST		1.961		
FROM 5543				
01705 LAG DIST FROM 5543		- 50		
OLICS LNG DIST				
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01 05 LPG DIST				
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01 03 46 0151	L001-603			
	L001-603			
05 547				
1. 2. 1. N. (1. ST		A		
wom 5543				
	The strength of the strength of the			

I agree that my liability for this bill is not waived and agree to be need personally liable in the event that the indicated person, company or esociation fails to pay for any or the full amount of these charges. If also agree that all charges contained in this account the correct and any disputes or requests for copies of uniques must be incide within five days after my departure.



10.25 M (2002) Second of Territ Advanced Marcanetti (2002) Marcanetti (2002)

1. J.	DATE	REFERENCE	CHARGES	CREDIT	BALANCE DUE
13					1
01/05	LNG DIST	1.001-503	.50		1. 1. 1
10 Mar.	FROM 554				
01/05	LNG DIST		4.13		
8 C	FROM 5543				
01/05	LNG DIST		.50		- 200
	FROM 5540				
01/05	CAFE CHG		136.17		
	FROM 5543	SALITICA			
01/05	LNG DIST	L001-718	1.77		
	FROM 5559	BRAUNIBE			
	LNG DIST		1.75		
	FROM 5559	BRAUN, BE			
01/05	LNG DIST	L001+603	.50		
	LNG DIST		1.77		
	LNG DIST				
01/05	LNG DIST		2.53		
	FROM 5559				
01/05	LNG DIST		1.75		
	FROM 5559	BRAUN, BE			
01/05	LNG DIST	L001-212	2.43		
01/05	LNG DIST	L001-212	2.39		
01/05	UNG DIST	L001-603			
11111123	UND 0151	L001-212	1.75		
	F405 117.21	L001-603	1.50		
81.65	LNG DIST .	L001-212	1.1.92		
	PR:00 5543				
01.03	MISC INC	23COPIES	4.70		
	20034	1105, 1	1.137.00		
	Fabr 5547				
105 103	996 (FA)	1105, 1	1 S. A.		
		SALIT, CA			
	1. S. 20	1109, 1			
	1.	BRAUN, BE			
		1109, 1	1		
_	7	BRAUN, BE		and the second second	

I agree that my closer for this bill is not waved, and agree to be herd paramany label in the event that the indicated person, company or incompany to basis to pay for any or the full amount of these charges. I also agree that all charges contained in this account are correct and any disputes or respects to comes of charges must be made within the days after my departure.



THE REPORT AND A CONTRACT

			in part for the	
	DATE REFERENCE	CHARGES	CREDIT	BALANCE DUE
20.000				
01/05	ROOM	80.00		
	FROM 5545 SALITINA			
01/05	RM TAX	6.40		
	FROM 5540 BALLING			
	R00M 1200 1 RM TAX 1200 1	195.00		
		15.60		
01/06	COMSAT 2MOVIES	13.90		
	FROM 554 SALITICA			
01/05	COMSAT	6.95		
	FROM 5545 SALITICA			
01/05	COMSAT 3HOVIES	20.85		
and the	FROM 5543 SALITICA			
01/08	LNG DIST . L001-503	.50		
10000000	FROM 5547 SALIT CA			
01/08	LNG DIST' LO01-212	1.75		
	FROM 5547 SALIF, CA			
	LNG DIST LOO1-603	.50		
	FROM 5547 SALIT, CA			
01708	LNG DIST LOC1-603	.50		
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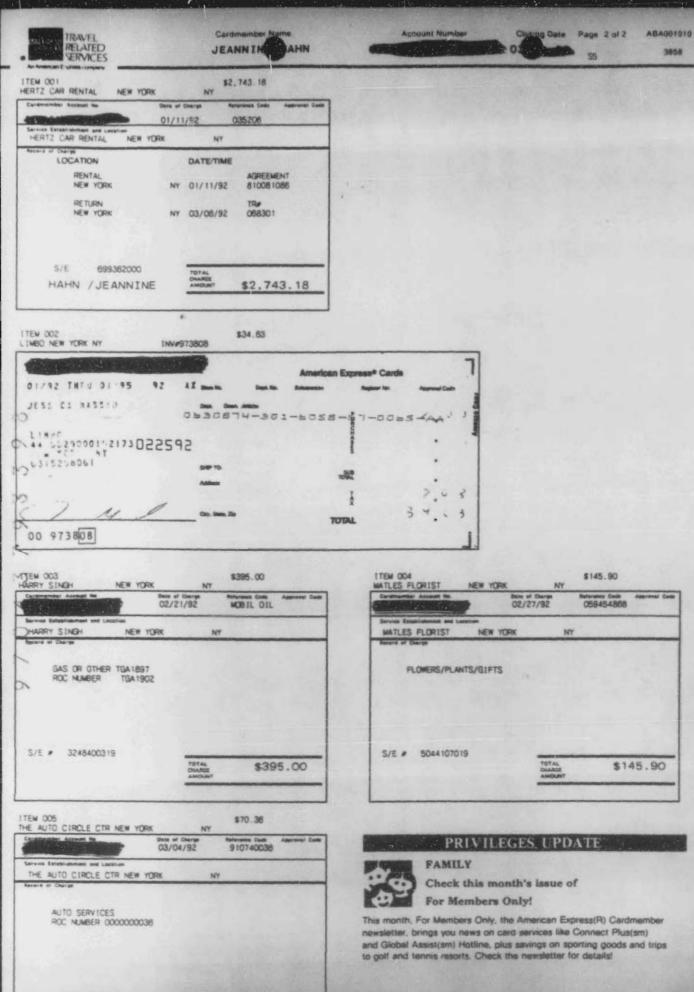
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RECEIVE \$5 OF FREE CALLING WITH MCI CONNECT PLUS. CALL 800-456-0545



Please see reverse side for important information.



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AGENDA DOCUMENT No. X97-15

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

28 U.S.C. § 2462 Statute of Limitations

GENERAL COUNSEL'S REPORT

EXECUTIVE SESSIO

I. INTRODUCTION

On December 26, 1996, the United States Court of Appeals for the Ninth Circuit issued a decision in *Federal Election Commission v. Williams*, No. 95-55320 (9th Cir. Filed Dec. 26, 1996). That decision held, *inter alia*, that the five-year statute of limitations for filing suit to enforce a civil penalty established at 28 U.S.C. § 2462 applies not only to judicial proceedings to enforce civil penalties already imposed, but also to proceedings seeking the imposition of these penalties, including the Commission's law enforcement suits under 2 U.S.C. § 437g(a)(6).

As noted in the memorandum regarding the filing of a petition for rehearing, the Office of General Counsel believes that the Commission should accept the court's core application of 28 U.S.C. § 2462 to its enforcement suits as the current state of the law. See Memorandum to the Commission, Petition for Rehearing, and Suggestion for Rehearing En Banc, In Federal Election Commission v. Williams, dated January 10, 1997. As also noted, however, we have sought further review of the court's decision relating to issues of equitable relief and equitable tolling.¹ Id. See also FEC v. NRSC, 877 F. Supp. 15, 21 (D.D.C. 1995).

This General Counsel's Report discusses the impact of 28 U.S.C. § 2462 on the Office of General Counsel's enforcement caseload.² This Report describes the active and inactive enforcement matters which are potentially affected by the application of the five-year statute of limitations under 28 U.S.C. § 2462, and makes recommendations for each of the potentially affected matters. This Report addresses all cases where the statute of limitations potentially expires, or partially expires, by the end of calendar year 1997 (December 31, 1997).

The Office of General Counsel is recommending that

18 matters be closed at this time. By doing so, this Office believes that it will be able to devote more resources toward more recent activity, particularly those matters that arose from the 1996 election cycle. To avoid potential statute of limitations problems in the future, this Office will track its cases against the relevant statute of limitations and will perform regular reviews of its caseload. In addition, this Office will be making periodic recommendations to the Commission with respect to matters that may be affected by the application of the five-year statute of limitations under 28 U.S.C. § 2462.

¹ Pending the court's decision, issues such as equitable relief, equitable tolling and ongoing violations, will remain open. In some instances, although issues such as equitable tolling and equitable relief may still be viable, this Office has cited other factors to support our recommendation to close the matter. See, e.g., cases involving apparent violations of 2 U.S.C. § 441a(f).

² This Report addresses enforcement matters assigned to the Public Financing, Ethics & Special Projects ("PFESP") and Enforcement areas.

III. RECOMMENDATIONS

The Office of General Counsel recommends that the Commission:

A. Decline to open a MUR, close the file, and approve the appropriate letters in Pre-MUR 344.

B. Take no action, close the file and approve the appropriate letters in the following matters:

MUR 4267
 MUR 4370
 MUR 4392
 MUR 4432
 MUR 4468
 MUR 4468
 MUR 4591
 MUR 4614

C. Take no further action, close the file and approve the appropriate letters in the following matters:

1.	MUR 3351
2.	MUR 3571
3.	MUR 3582
4.	MUR 3586
5.	MUR 3838
6.	MUR 3841
7.	MUR 3969
8.	MUR 4091
9.	MUR 4183
10.	MUR 4209

-3/4/97 Date

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Lawrence M. Noble General Counsel

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of) 28 U.S.C. § 2462,) Statute of Limitations)

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Agenda Document #X97-15

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on March 11, 1997, do hereby certify that the Commission took the following actions with respect to Agenda Document #X97-15:

1. Decided by a vote of 5-0 to -

A. Decline to open a MUR, close the file, and approve the appropriate letters in Pre-MUR 344.

B. Take no action, close the file, and approve the appropriate letters in the following matters:

1.	MUR	4267;
2.	MUR	4370;
3.	MUR	4392;
4.	MUR	4432;
5.	MUR	4468;
6.	MUR	4591;
7.	MUR	4614.

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Federal Election Commission Certification: Agenda Document #X97-15 March 11, 1997

C. Take no further action, close the file, and approve the appropriate letters in the following matters:

MUR 3351; 1. 2. MUR 3571; MUR 3582; 3. 4. MUR 3586; 5. MUR 3838; 6. MUR 3841; 7. MUR 3969; MUR 4091; 8. 9. MUR 4183; 10. MUR 4209.

Commissioners Aikens, Elliott, McDonald, McGarry,

and Thomas voted affirmatively for the decision.

(continued)



Federal Election Commission Certification: Agenda Document #X97-15 March 11, 1997

3-12-97 Date

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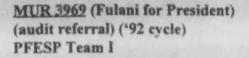
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Marjonie W. Emmone

Attest:

Marjorie W. Emmons Secretary of the Commission

Page 3



On May 24, 1996, the Commission found reason to believe that the Committee violated 2 U.S.C. § 441a(f) by accepting excessive contributions through staff advances and that the staff members violated 2 U.S.C. § 441a(a)(1)(A) by making the contributions (totaling \$105,114.82). The Commission also offered to enter into conciliation with the Committee prior to a finding of probable cause to believe. The Commission took no further action against the individual contributors. The Commission also took no action with respect to certain transactions between the Committee and one of its vendors, the International Peoples' Law Institution in light of the concurrent 11 C.F.R. § 9039.3 investigation of the Committee.

This Office recommends that the Commission exercise its prosecutorial discretion and take no further action, and close the file with respect to this matter. Most of the activity at issue occurred prior to September 1992. Thus, even though some of the activity is still not time-barred under 28 U.S.C. § 2462, this Office believes that pursuing those violations that occurred less than five years ago would, at this stage of the enforcement process, be an inefficient use of the agency's limited resources.



March 21, 1997

Marsha Plafkin 125 West 106th Street # 5B New York, New York 10025

> RE: MUR 3969 Marsha Plafkin

Dear Ms. Plafkin:

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This is to advise you that this matter is now closed. The confidentiality provisions at 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 before receiving your additional materials, any permissible submissions will be added to the public record upon receipt.

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

Sincerely,

Hull

Craig D. Reffner Attorney



March 21, 1997

Fred Newman 175 West 72nd Street New York, New York 10023

> RE: MUR 3969 Fred Newman

Dear Mr. Newman:

This is to advise you that this matter is now closed. The confidentiality provisions at 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 before receiving your additional materials, any permissible submissions will be added to the public record upon receipt.

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

Sincerely,

- Jyle Refly Craig D. Reffner



March 21, 1997

Eleanor Fain 390 Riverside Drive New York, New York 10025-1834

> RE: MUR 3969 Eleanor Fain

Dear Ms. Fain:

This is to advise you that this matter is now closed. The confidentiality provisions at 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 before receiving your additional materials, any permissible submissions will be added to the public record upon receipt.

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

and with

Craig D. Reffner Attorney



March 21, 1997

Jeanine Hahn 210 West 101 Street Apartment 11-C New York, New York 10025-5059

> RE: MUR 3969 Jeanine Hahn

Dear Ms. Hahn:

This is to advise you that this matter is now closed. The confidentiality provisions at 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 before receiving your additional materials, any permissible submissions will be added to the public record upon receipt.

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

Craig D. Reffner Attorney



March 21, 1997

Margaret Golden 180 Napoleon Street San Francisco, California 94124

> RE: MUR 3969 Margaret Golden

Dear Ms. Golden:

This is to advise you that this matter is now closed. The confidentiality provisions at 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 before receiving your additional materials, any permissible submissions will be added to the public record upon receipt.

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

Craig D. Reffiner

Attorney



March 21, 1997

Nancy Ross c/o Ross & Green 1010 Vermont Avenue, N.W. Washington D.C. 20005

> RE: MUR 3969 Nancy Ross

Dear Ms. Ross:

This is to advise you that this matter is now closed. The confidentiality provisions at 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 before receiving your additional materials, any permissible submissions will be added to the public record upon receipt.

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

Sincerely,

Craig D. Reffner



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 21, 1997

Cathy Stewart 240 Cabrini Boulevard New York, New York 10033

> RE: MUR 3969 Cathy Stewart

Dear Ms. Stewart:

This is to advise you that this matter is now closed. The confidentiality provisions at 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 before receiving your additional materials, any permissible submissions will be added to the public record upon receipt.

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

Sincerely,

Craig D. Reffner



March 21, 1997

Lawrence Grigsby 4116 Don Diablo Drive Los Angeles, California 90008-4306

> RE: MUR 3969 Lawrence Grigsby

Dear Mr. Grigsby:

This is to advise you that this matter is now closed. The confidentiality provisions at 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 before receiving your additional materials, any permissible submissions will be added to the public record upon receipt.

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

Sincerely,

Craig D. Reffner Attorney



March 21, 1997

James Ross RD 2 Box 540 Middlebury, Vermont 05753-9315

> RE: MUR 3969 James Ross

Dear Mr. Ross:

This is to advise you that this matter is now closed. The confidentiality provisions at 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 before receiving your additional materials, any permissible submissions will be added to the public record upon receipt.

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

Sincerely, Craig D. Reffner



March 21, 1997

Margert Tanzosh 285 Avenue C New York, New York 10009

> RE: MUR 3969 Margert Tanzosh

Dear Ms. Tanzosh:

This is to advise you that this matter is now closed. The confidentiality provisions at 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 before receiving your additional materials, any permissible submissions will be added to the public record upon receipt.

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

Sincerely, 100 1 Craig D/Reffner Attorney

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March 21, 1997

John Opdyke 4313 Larchwood Philadelphia, Pennsylvania 19104

> RE: MUR 3969 John Opdyke

Dear Mr. Opdyke:

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This is to advise you that this matter is now closed. The confidentiality provisions at 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 before receiving your additional materials, any permissible submissions will be added to the public record upon receipt.

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

Craig D. Reffner Attorney



March 21, 1997

Robert Levy 250 West 57th Street New York, New York 10019

> RE: MUR 3969 Robert Levy

Dear Mr. Levy:

This is to advise you that this matter is now closed. The confidentiality provisions at 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 before receiving your additional materials, any permissible submissions will be added to the public record upon receipt.

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

Sincerely,

Craig D. Reffner



March 21, 1997

David Belmont 5 West 107th Street Apartment 5-B New York, New York 10025

> RE: MUR 3969 David Belmont

Dear Mr. Belmont:

This is to advise you that this matter is now closed. The confidentiality provisions at 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 before receiving your additional materials, any permissible submissions will be added to the public record upon receipt.

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

Sincerely,

Craig D. Reffner



March 21, 1997

Jini Berman 210 West 101st Street New York, New York 10025-5059

> RE: MUR 3969 Jini Berman

Dear Ms. Berman:

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This is to advise you that this matter is now closed. The confidentiality provisions at 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 before receiving your additional materials, any permissible submissions will be added to the public record upon receipt.

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

hky Craig D. Reffner Attorney



FEDERAL ELECTION COMMISSION

March 21, 1997

Arthur R. Block, Esq. 14 Wall Street 28th Floor New York, New York 10005-2101

RE:

MUR 3969 Lenora B. Fulani for President and Francine Miller, as treasurer International Peoples' Law Institution

Dear Mr. Block:

On June 7, 1996, you were notified that the Federal Election Commission (the "Commission") found reason to believe that Lenora B. Fulani for President and Francine Miller, as treasurer (collectively referred to as the "Committee"), violated 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended (the "Act"). On August 2, 1997, you submitted a response on behalf of your clients to the Commission's reason-to-believe finding. After considering the circumstances of this matter, the Commission, on March 11, 1997, determined to exercise its prosecutorial discretion and take no further action against the Committee. See enclosed narrative.

In addition, please note that the Audit Division also referred an additional apparent violation of the Act to the Office of the General Counsel for possible enforcement action. That referral, which also emanated from an audit of the Committee undertaken pursuant to 26 U.S.C. § 9033(a)(3), concerned an apparent excessive contribution that the Committee received from the People's law Institution. The Commission, after considering the circumstances of this matter, has also determined to exercise its prosecutorial discretion and to take no action against the Committee. Accordingly, the Commission closed the file in this matter on March 11, 1997. See enclosed narrative.

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. Arthur R. Block, Esq. Page 2

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

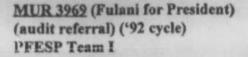
Sincerely,

Craig D. Reffner

Attorney

Enclosure

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On May 24, 1996, the Commission found reason to believe that the Committee violated 2 U.S.C. § 441a(f) by accepting excessive contributions through staff advances and that the staff members violated 2 U.S.C. § 441a(a)(1)(A) by making the contributions (totaling \$105,114.82). The Commission also offered to enter into conciliation with the Committee prior to a finding of probable cause to believe. The Commission took no further action against the individual contributors. The Commission also took no action with respect to certain transactions between the Committee and one of its vendors, the International Peoples' Law Institution in light of the concurrent 11 C.F.R. § 9039.3 investigation of the Committee.

This Office recommends that the Commission exercise its prosecutorial discretion and take no further action, and close the file with respect to this matter. Most of the activity at issue occurred prior to September 1992. Thus, even though some of the activity is still not time-barred under 28 U.S.C. § 2462, this Office believes that pursuing those violations that occurred less than five years ago would, at this stage of the enforcement process, be an inefficient use of the agency's limited resources.



FEDERAL ELECTION COMMISSION

THIS IS THE END OF MUR # _ 3969

DATE FILMED 4-25-97 CAMERA NO. 1 CAMERAMAN JM 1