



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 2764

DATE FILMED 9/13/90 CAMERA NO. 2

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BEFORE THE FEDERAL ELECTION COMMISSION
OF THE UNITED STATES

88 NOV -3 PM 3:26

IN THE MATTER OF:

Herb Kohl

Herb Kohl for United States Senate, Inc.

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MUR

I. INTRODUCTION

Herb Kohl is accepting special interest group PAC contributions and illegally hiding their source from public view, according to pre-election reports filed with the Federal Election Commission (FEC).

Despite asserting that being "Nobody's Senator But Yours" means that he will not accept contributions from special interest PACs, the October 1 - 19 report filed by the liberal disarmament PAC Council for a Livable World shows more than \$20,000 in bundled contributions sent to Kohl's Senate campaign committee. Exhibit 1.

In an apparent effort to cover up receipt of these special interest PAC contributions, Kohl and his campaign committee are violating the Federal Election Campaign Act (Act) by failing to show these contributions as coming through the PAC. In hiding these special interest PAC contributions, Kohl ignored the filing of the Council for a Livable World whose FEC report clearly described the contributions as ones which must be reported as

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being transmitted through the PAC. 2 U.S.C. 441a(a)(7)(A);
11 C.F.R. 110.6.

Full disclosure is the basic tenet of federal election law. Kohl's cover up of his contributions from PACs means he is depriving the public of its statutory right to know who Herb Kohl is and who is giving him money for his United States Senate campaign. The fact that he is deliberately disguising his PAC contributions in violation of the Act's disclosure requirements is a hypocritical decision to avoid public accountability that must be investigated by the FEC.

The bundled money from the Council for a Livable World's special interest PAC is not the only time information on other PAC's FEC reports has unmasked Kohl's hypocrisy. By this complaint, the National Republican Senatorial Committee also asks the FEC to investigate:

* the involvement of Kohl and members of his campaign in independent expenditures undertaken by the Wisconsin Action Coalition (WAC) against Kohl's Senate opponent, Susan Engleiter. WAC receives nearly all of its funding from the PACs of organized labor unions. Exhibits 2 (PAC chart), 3 (WAC chart) and 4 (1988 FEC report). If there is any coordination between WAC and the Kohl campaign (especially his assistant campaign manager William Christofferson), it is a violation of the Act. At the very least, Kohl's statements about rejecting help from special interests

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mandate that he publicly repudiate WAC and its efforts against Engeleiter which aid Kohl.

* Kohl's excessively large personal contributions to the 1986 Senate campaign of Alan Cranston violate the Act and demonstrate, in conjunction with the other counts of this complaint, that Kohl knows how to manipulate the campaign disclosure laws if it serves his own special interests. Kohl gave two contributions totaling \$1,900 (\$900 over the allowable limit) to Cranston's general election campaign, and in an apparent effort to avoid detection, made his second contribution in the fictitious name of "Mrs. Herbert Kohl" at Kohl's home address. Exhibit 5.

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II. LEGAL DISCUSSION

A. Bundled PAC Contributions

Facts: Herb Kohl has repeatedly asserted during the course of his campaign for the United States Senate that he is free of special interest influence and the evils of the current system of campaign finance. He insists that he is not accepting any contributions from PACs.

But the pre-election report filed by the Council for a Livable World, a PAC registered with the FEC, shows that this special interest group sent \$20,357.45 in bundled contributions to

Kohl's campaign committee. Exhibit 1. The PAC's solicitation for Kohl includes a donation form under the heading, "How does giving through the Council for a Livable World double my political clout?" It explains: "We combine your check with thousands of contributions from our other supporters and present them to the candidates. You get credit for your individual contributions, the peace movement gets credit, and our lobbying strength for genuine arms control is increased." This PAC mailing also solicits contributions on behalf of the Council and one other Senate candidate, Mike Lowry of Washington.

The campaign finance reform bills sponsored by both Democrats and Republicans during the last session of Congress banned "bundled" contributions such as the ones Kohl has received from the Council for a Livable World PAC.

A comparison of the PAC's and Kohl's pre-election reports shows how Kohl has violated the law by accepting the PAC's money but not disclosing the source. The PAC's report lists contributions sent to Kohl's campaign, Exhibit 1, but Kohl's report fails to show the contributions as coming from the PAC. Unlike Kohl, Lowry's FEC report does identify all the Council's contributions as being transmitted through it. Exhibit 8. The Act requires that this information be sent to recipient campaigns so it can include it in their reports.

As the chart below demonstrates, Kohl has accepted the money sent him by the PAC and, in an artful attempt to cover-up his

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receipt and use of these special interest contributions, illegally listed them randomly in his FEC report as regular contributions from individuals. The chart is a partial listing of the contributions sent by the PAC on October 6, 1988 to Kohl's campaign and which page of his report Kohl listed them on:

<u>NAME OF PAC CONTRIBUTOR</u>	<u>PAGE LISTED ON KOHL FEC REPORT</u>
Robert Adams (Calif)	95 (Line 11 a ii)
James Arnold (Calif)	20 (Line 11 a i)
Louise Arnold (Calif)	20 (Line 11 a i)
Joan H. Blumenkranz (Calif)	68 (Line 11 a ii)
Abner Brodie (Wis)	49 (Line 11 a ii)
Sheila E. Erlach (Nev)	82 (Line 11 a ii)
Elizabeth Gurney (Utah)	52 (Line 11 a ii)
Norman Hirsh (Wash)	23 (Line 11 a ii)
Lean Larson (Wis)	5 (Line 11 a ii)
Alice Lazerowitz (Mass)	38 (Line 11 a ii)
Keith Miller (Calif)	11 (Line 11 a ii)
Robert Olmstead	5 (Line 11 a i)
Jean Pauline	94 (Line 11 a ii)
Paul Scheifer (Calif)	51 (Line 11 a ii)
Kate Selover (Calif)	81 (Line 11 a ii)
Harlan J. Smith (Texas)	10 (Line 11 a i)
Sandor Straus (Calif)	67 (Line 11 a ii)
George Wallerstein (Wash)	13 (Line 11 a i)
Louise Wilson (Calif)	37 (Line 11 a ii)
Lore Young (Calif)	22 (Line 11 a ii)

In addition, the campaign had fair notice that the Council considers its contributions to Kohl as bundled PAC contributions which must be reported as such. In an October 20, 1988 article in the Appleton Post-Crescent, FEC press spokesman Fred Eiland disputed Kohl aide's Christofferson's explanation of the PAC's contributions. The news account, which also quotes Christofferson, reports that Eiland described the PACs

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contributions as a "practice known as 'bundling.' It is legal but both the PAC and the candidate must report that the individual contributions were collected by the PAC." Exhibit 7. In other words, Lowry followed the law but Kohl did not.

Law: "Bundled" contributions are permitted under the Act and occur when a PAC solicits its members to write checks payable to a specific candidate but to send the checks to the PAC. The PAC then collects or "bundles" the checks before sending them to the candidate. As the Council states in its solicitations, this allows the PAC to "combine your check with thousands of contributions from our other supporters and present them to candidates. You get credit for your individual contributions, the peace movement gets credit, and our lobbying strength for genuine arms control is increased."

The practice of bundling is permissible under the Act as long as the reporting requirements of the Act and the Regulations are met. 2 U.S.C. 441a(a)(7)(A); 11 C.F.R. 110.6. The law does require that the bundler list all such contributions on its FEC reports. 11 C.F.R. 110.6(c). In addition, the bundler must send a full report on all the contributions to the recipient committee, in this case Kohl's. 11 C.F.R. 110.6(c)(2).

The recipient committee's next FEC report must include information on all bundled contributions. In other words, Kohl's pre-election report had to include information on the contributor and contribution, as well as "each conduit through which the

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contribution passed." 11 C.F.R. 110.6(c)(3).

Discussion: Kohl's FEC report does not include this information, a violation of the law. Id.; 2 U.S.C. 432(b)(2); 434. This omission is particularly insidious in light of the fact that it hides from public view information that shows Kohl is not abiding by his own statements on special interest contributions and campaign financing.

B. Wisconsin Action Coalition Independent Expenditures:

Facts: WAC has conducted independent expenditures against Kohl's Senate opponent. Exhibit 4. These actions are, by WAC's admission, designed to influence the defeat of Susan Engeleiter. Kohl benefits from these independent expenditures.

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WAC, which is the subject of a pending FEC enforcement matter concerning the group's illegal corporate contributions to federal candidates and an Internal Revenue Service investigation concerning its alleged abuse of its favored tax status for partisan political purposes, is funded almost exclusively by money funneled through labor union PACs. Exhibits 2 and 3. In 1986, \$14,500 of the \$14,850 it spent came from labor union PACs. In 1988, \$5,000 of the \$5,350 it has raised has come from the Machinists union PAC in Washington, D.C., which also funded it last year. Exhibit 4.

LAW: The Act defines an independent expenditure as one which advocates the election or defeat of a clearly identified

candidate "without cooperation or consultation with any candidate, or any authorized committee or agent of such candidate, and which is not made in concert with, or at the request or suggestion of, any candidate, or any authorized committee or agent of such candidate." 2 U.S.C. 431(17).

Discussion: Kohl assistant campaign manager Christofferson has benefited from WAC contributions in the past through his work for other WAC-supported candidates. The FEC should investigate whether any coordination has taken place between WAC and the Kohl campaign that would violate 2 U.S.C. 431(17).

Kohl has steadfastly criticized the influence of special interests in American elections. But he has not told WAC to stay out of the Wisconsin Senate race. Kohl obviously believes that WAC's special influence in the campaign is different, perhaps because he is the beneficiary. To avoid being hypocritical, Kohl must tell WAC to discontinue its activities in Wisconsin. At the very least, he must explain who WAC is and why it wants Herb Kohl in the United States Senate.

C. Illegal Personal Contributions

Facts: According to the 1986 FEC reports of Alan Cranston's Senate campaign, Herbert H. Kohl of 825 N. Jefferson St., Milwaukee, WI. made a \$900 general election contribution on August 6, 1986. See Exhibit 6. And, according to the reports,

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Mrs. Herbert Kohl of 825 N. Jefferson St., Milwaukee, WI. made a \$1,000 general election contribution on November 3, 1986. See Attachment 7. Kohl is not married.

Law: Federal election law allows individuals to contribute a maximum of \$1,000 to a candidate's general election campaign. 2 U.S.C. 441a(a)(1). In addition, a person may not make contributions in the name of another. 2 U.S.C. 441f.

Discussion: Kohl is a candidate for the Senate of the United States. Yet his own personal giving violates the law's contributions limits by almost 100 percent. And in order to support his candidates, Kohl appears willing to give money in the name of the wife he does not have.

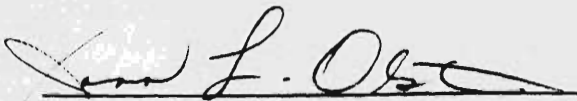
III. Prayer for Relief

In order to rectify this situation, the FEC must investigate Herb Kohl and his campaign contribution practices. Kohl should be made to explain to the voters of Wisconsin before the November 8, 1988 election why he disguised in his FEC report contributions he said he would never accept. In addition, the FEC should discover whether Kohl is linked to the independent expenditures of Citizen Action and how the Cranston for Senate Committee came to report a contribution for a nonexistent person.

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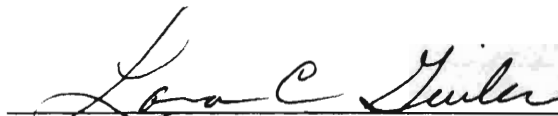
IV. Verification

The undersigned swears that the allegations and facts set forth herein in this Complaint are true to the best of his knowledge, information and belief.



Jann L. Olsten
Executive Director
National Republican Senatorial Comm.
440 First Street, N.W.
Suite 600
Washington, D.C. 20001

Subscribed to and sworn
to before me this 31 day
of October 1988



Notary Public

My Commission Expires:

July 14 1992

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EXHIBIT 1

Council for a Livable WORLD

Pre-Election Report

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

SECRETARY OF THE SENATE
OCT 27 AM 3 32
HAND DELIVERED

USE PREVIOUS EDITION OR PRINT TYPE OR PRINT

1. NAME OF COMMITTEE (in full) Council for a Livable World ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported 20 Park Plaza CITY, STATE (and ZIP CODE) Boston, MA 02116	2. FEC IDENTIFICATION NUMBER C0029165 3. <input type="checkbox"/> This committee qualified as a multiballot committee DURING THIS Reporting Period on _____ (State).
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4. TYPE OF REPORT

(a) April 15 Quarterly Report
 July 15 Quarterly Report
 October 15 Quarterly Report
 January 31 Year End Report
 July 31 Mid Year Report (Non-election Year Only)
 Termination Report

Monthly Report Due On:
 February 20 June 20 October 20
 March 20 July 20 November 20
 April 20 August 20 December 20
 May 20 September 20 January 31

Twelfth day report preceding General
 (Type of Election)
 election on 11/8/88 in the State of _____

Thirtieth day report following the General Election on _____ in the State of _____

(b) Is this Report an Amendment? YES NO

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period <u>10/1/88</u> through <u>0/19/88</u>		
6. (a) Cash on Hand January 1, 19 <u>88</u>		\$ 111,828.17
(b) Cash on Hand at Beginning of Reporting Period	\$ 133,970.83	
(c) Total Receipts (from Line 18)	\$ 31,411.57	\$ 417,547.34
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 165,382.40	\$ 529,375.51
7. Total Disbursements (from Line 28)	\$ 42,605.20	\$ 406,598.31
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 122,777.20	\$ 122,777.20
9. Debts and Obligations Owed TO the Committee (itemize all on Schedule C and/or Schedule D)	\$	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9630 Local 202-576-3120
10. Debts and Obligations L. BY the Committee (itemize all on Schedule C and/or Schedule D)	\$	

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

Type or Print Name of Treasurer
Jerome Grossman

Signature of Treasurer
Jerome Grossman

Date
10/19/88

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

DETAILED SUMMARY PAGE

of Receipts and Disbursements
(Page 8, FRS FORM 33)

Name of Committee (in full)	Report Covering the Period	
COUNCIL for a Livable World	From: 10/1/88	To: 10/19/88
I. RECEIPTS	COLUMN A	COLUMN B
	Total This Period	Calendar Year-To-Date
11. CONTRIBUTIONS (other than loans) FROM:		
(a) Individuals/Persons Other Than Political Committees		
(i) Itemized (use Schedule A)	14,230.00	107,999.97
(ii) Unitemized	17,064.54	279,634.07
(iii) Total of contributions from individuals	31,294.54	387,634.04
(b) Political Party Committees		
(c) Other Political Committees (such as PACs)		
(d) TOTAL CONTRIBUTIONS (add 11(a)(iii), (b), and (c))	31,294.54	387,634.04
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES		
13. ALL LOANS RECEIVED		
14. LOAN REPAYMENTS RECEIVED		
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)		23,524.19
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		
17. OTHER RECEIPTS (Dividends, Interest, etc.)	117.03	6369.11
18. TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)	71,411.57	417,547.34
II. DISBURSEMENTS		
19. OPERATING EXPENDITURES	18,375.20	244,685.71
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES	5,000	80,000
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	19,230	81,912.60
22. INDEPENDENT EXPENDITURES (use Schedule E)		
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (use Schedule F)		
24. LOAN REPAYMENTS MADE		
25. LOANS MADE		
26. REFUNDS OF CONTRIBUTIONS TO:		
(a) Individuals/Persons Other Than Political Committees		
(b) Political Party Committees		
(c) Other Political Committees (such as PACs)		
(d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c))		
27. OTHER DISBURSEMENTS		
28. TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	42,605.20	406,598.31
III. NET CONTRIBUTIONS/OPERATING EXPENDITURES		
29. TOTAL CONTRIBUTIONS (other than loans) (from Line 11(d))	31,294.54	387,634.04
30. TOTAL CONTRIBUTION REFUNDS (from Line 26(d))		
31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from 29)	31,294.54	387,634.04
32. TOTAL OPERATING EXPENDITURES (from Line 19)	18,375.20	244,685.71
33. OFFSETS TO OPERATING EXPENDITURES (from Line 15)		18,044.29
34. NET OPERATING EXPENDITURES (subtract Line 33 from 32)	18,375.20	225,641.42

Contributions included for receipt by

Mr. MICHAEL CARRIER
HERB KONT for U.S. Senate
825 North Jefferson Street
MILWAUKEE, WI 53202

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Name / Address of Contributor	Date-Rec	Date-Paid	Amount	Occupation / Business
Robert H. Adams 2511 Motor Avenue, Los Angeles, CA 90064	10/06/68	10/06/68	50.00	professor U.C.L.A.
Steve Andreas 3221 Left Hand Canyon Dr Jct, Boulder, CO 80302	10/06/68	10/06/68	200.00	journalist
James Arnold 2425 Ellington Road, La Jolla, CA 92037	10/06/68	10/06/68	1000.00	professor University of California
Louise Arnold 2425 Ellington Road, La Jolla, CA 92037	10/06/68	10/06/68	1000.00	housewife
Rick E Berger 7027 Settlers Ridge, San Antonio, TX 78230-2154	10/06/68	10/06/68	15.00	Information Requested Not Provided
John H. Blumkrantz 7312 Woodrow Wilson Drive, Hollywood, CA 90046	10/06/68	10/06/68	25.00	Retired
Adair Brodie 3700 Council Crest, Madison, WI 53711	10/05/68	10/06/68	75.00	retired law professor University of Wisconsin
Hamilton B. Brown 318 Tulane Place NE, Albuquerque, NM 87100	10/05/68	10/06/68	50.00	Physician
David M. Coftan 130 NW 114th, Portland, OR 97229	10/06/68	10/06/68	30.00	teacher Cathedral School
Arthur J. Deiman 15 Muir Avenue, Mill Valley, CA 94941	10/06/68	10/06/68	100.00	Psychiatrist Self-employed
Elizabeth Diebold Route 3 Box 330, Los Lunas, NM 87031	10/05/68	10/06/68	50.00	Information Requested Not Provided
Charles F. Driscoll 4420 Red Deer St, San Diego, CA 92122	10/06/68	10/06/68	25.00	Information Requested Not Provided
Gregory J. Erickson 509 1/2 2nd Street, Hudson, WI 54016	10/06/68	10/06/68	50.00	Information Requested Not Provided
Shella E. Ertach 226 Moore Lane, Reno, NV 89549	10/06/68	10/06/68	10.00	Information Requested Not Provided

TRANSMISSION REPORT

Ms. MICHELE CARRIAR
 Ward Room for U.S. Senate
 825 North Jefferson Street
 Milwaukee, WI 53202

Contributions Intended for Receipt By

Name / Address of Contributor	Date-Rec	Date-Pay	\$ Amount	Occupation / Business
Jay M. Freeman 300 1/2 S Reeves Dr, Beverly Hills, CA 90212	10/03/68	10/06/68	2.00	Information Requested Not Provided
James E. Fisher 6645 N. Douglas Hwy, Joplin, MO 64601	10/06/68	10/06/68	100.00	Retired Lawyer State of Alaska
Robert D. Goff 1099 Sycamore Lane, Salt Lake City, UT 84117	10/06/68	10/06/68	20.00	Retired
Elizabeth Burney 203 4th Ave., Salt Lake City, UT 84103	10/06/68	10/06/68	25.00	Scientist-Biology University of Utah
Larry Ellen Hamilton 12025 130 Avenue SE, Renton, WA 98054	10/03/68	10/06/68	20.00	Interviewer Washington State
Norman Hirsch 7042 23rd NE, Seattle, WA 98115	10/06/68	10/06/68	5.00	Road Temple Beth Am
Louis B. Jackson 7365 Umba Road, Pacific Palisades, CA 90272	10/06/68	10/06/68	100.00	Builder
Cherie Kaplan 1118 Village Blvd, Camarillo, CA 93610	10/06/68	10/06/68	10.00	Information Requested Not Provided
Mary Jean Knowles 1226 Danfield Way, Vacaville, CA 95648	10/06/68	10/06/68	30.00	Information Requested Not Provided
William Koni 2710 Sierra Blvd., Sacramento, CA 95844	10/05/68	10/06/68	25.00	Physician Self
Jeffrey Kroot 222 Crescent Dr, San Anselmo, CA 94960	10/05/68	10/06/68	25.00	Information Requested Not Provided
Lean Larson 4620 St Clair Street, Racine, WI 53402	10/06/68	10/06/68	5.00	Information Requested Not Provided
Henry D. Lawson 215 Willow Bend, Kiel, WI 53042	10/06/68	10/06/68	100.00	Retired Professor
Alice Lazorenitz 126 Vernon Street, Northampton, MA 01060	10/03/68	10/06/68	5.00	Retired Teacher Smith College

Contributions included for Receipt by

Ms. Michelle Carrier
Herb Kohl for U S Senate
625 North Jefferson Street
Milwaukee, WI 53202

Name / Address of Contributor	Date-Rec	Date-Pay	\$ Amount	Occupation / Business
Vivian S. Lifshutz 363 East Terra Alta Drive, San Antonio, TX 78209	10/03/88	10/06/88	\$ 20.00	investments self-employed
Milton Lozoff 1830 Sand Hill Rd., 452, Palo Alto, CA 94304	10/06/88	10/06/88	\$ 25.00	Physician self-employed
Strother B. Marshall MD 841 S Elizabeth Street, Salt Lake City, UT 84102	10/06/88	10/06/88	\$ 100.00	Physician FOP UMAN
Eitha Miller 1824 Shattuck Avenue, Berkeley, CA 94707	10/06/88	10/06/88	\$ 100.00	professor UCB
Walter Boordlinger 6702 Mayman Ave, La Canada, CA 91011	10/06/88	10/06/88	\$ 20.00	information Requested Not Provided
Josephine O'Neill 2404 Loring Street, San Diego, CA 92106	10/06/88	10/06/88	\$ 25.00	Retired
Robert Oimstead 2642 May Court, Palo Alto, CA 94303	10/06/88	10/06/88	\$ 1000.00	Executive Specialty Camp West
Jean Pauline 29 Liberty St, San Francisco, CA 94110	10/06/88	10/06/88	\$ 15.00	information Requested Not Provided
Caranna Plant 125 Red Gate Lane, Amherst, MA 01002	10/06/88	10/06/88	\$ 25.00	information Requested Not Provided
John R Poinsett 7821 East D Street 88, Tacoma, WA 98445	10/20/88	10/06/88	\$ 25.00	AT&T operator AT&T
Llene Prichard 716 Laguna Lane, Santa Barbara, CA 93100	10/05/88	10/06/88	\$ 50.00	Ford writer Self-employed
Reneeta Reiner 1455 La Perla Avenue, Long Beach, CA 90815	10/05/88	10/06/88	\$ 50.00	Businessman
Trevor Robinson 63 Pine Street, Amherst, MA 01002	10/06/88	10/06/88	\$ 25.00	professor U Mass
Mary A. Ross 958 Moreno Ave, Palo Alto, CA 94303	10/06/88	10/06/88	\$ 20.00	Retired R.P.T
Sub-Total		Page 00070	\$ 1,510.00	

Group 9 - 0007

Ms. Michelle Carrier
Hard Koni for U.S. Senate
625 North Jefferson Street
Milwaukee, WI 53202

CONTRIBUTIONS INCOME FOR RECEIPT BY ---

Name / Address of Contributor	Date-Acc	Date-Pay	Amount	Occupation / Business
Lee L. Rosman 630 North Orlando Avenue, Los Angeles, CA 90069-4205	10/05/88	10/06/88	20.00	Insurance Broker Self-employed
Arthur J. Rindig 11970 Redmill Avenue, Santa Ana, CA 92705	10/06/88	10/06/88	100.00	Retired physician
John Seaman 415 Dullman Ave 024, Oakland, CA 94610-0957	10/05/88	10/06/88	3.00	Retired
Ethel M. Sanjines 938 Clayton Street, San Francisco, CA 94117	10/06/88	10/06/88	200.00	Retired
Paul E. Schaffer 282 Indie Drive, Pismo Beach, CA 93449	10/06/88	10/06/88	30.00	Retired
Larry Scambell 1510 Blue Jay Way, Los Angeles, CA 90069-1215	10/05/88	10/06/88	50.00	Information Requested Not Provided
Robert Schultz 7899 St Helena Road, Santa Rosa, CA 95404	10/04/88	10/06/88	20.00	Retired
Late Seiver 203 E Valley Street, Willits, CA 95490	10/05/88	10/06/88	10.00	Retired
Sandra A Silver 640 Granite Creek Road, Santa Cruz, CA 95065-9733	10/06/88	10/06/88	20.00	Homemaker
Marian J. Smith 2705 Pecos Street, Austin, TX 78703	10/05/88	10/06/88	300.00	Astronomer/professor University of Texas, Aust
M. Brewster Smith 316 Escalona Drive, Santa Cruz, CA 95060	10/05/88	10/06/88	50.00	Retired professor University of California
Pearl M. Snider 20430 Bartel Drive, Walnut, CA 91789	10/05/88	10/06/88	3.00	Information Requested Not Provided
Sherman E. Stein 811 Oak Avenue, Davis, CA 95616	10/05/88	10/06/88	20.00	Teacher
Red Stone 830 Galvin Drive, El Cerrito, CA 94530	10/06/88	10/06/88	5.00	Retired Civil Service

Sub-Total Page 00071 1,041.00

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Ms. Michelle Carrier
 Herb Kohl for U.S. Senate
 625 North Jefferson Street
 Milwaukee, WI 53202

Contributions intended for receipt by _____

8
7
0
3
0
0
0
3
0
3
0
8

NAME / ADDRESS OF CONTRIBUTOR	Date-REC	Date-PAY	\$	AMOUNT	OCCUPATION / BUSINESS
Sander Struss 4212 Cairnwood Drive, Huntington Beach, CA 92646-3030	10/06/00	10/06/00	0	25.00	Capacity TRADER
Edna P. Sutton 1936 6th Street, Laverne, CA 91750	10/05/00	10/06/00	0	100.00	Housewife
Pauline T. Seanson 650 W. Harrison Avenue, Claremont, CA 91711-6536	10/06/00	10/06/00	0	10.00	Retired
Martie Terplan 400 Post Street, San Francisco, CA 94102	10/06/00	10/06/00	0	50.00	Physician
Jean H Tezer 1076 Merritt Dr, El Cajon, CA 92020	10/06/00	10/06/00	0	20.00	Information Requested Not Provided
Jan Venolia PO Box 694, Oxnard, CA 93445	10/05/00	10/06/00	0	50.00	Self-employed publisher
Richard C. Wagner 330 Woodland Drive, Whitefish, WI 53193	10/05/00	10/06/00	0	10.00	Retired
MARIE WALBA 3070 Carancho Street, La Mesa, CA 92041	10/06/00	10/06/00	0	25.00	chemistry professor San Diego State Univ.
George Wallerstein 538 NE 92nd Street, Seattle, WA 98115	10/06/00	10/06/00	0	1000.00	Professor of Astronomy University of Washington
Florence Oran Warner 6455 Hayes Drive, Los Angeles, CA 90048	10/06/00	10/06/00	0	25.00	Information Requested Not Provided
Nancy J. Waterman Box 020993, Juneau, AK 99802	10/06/00	10/06/00	0	50.00	Information Requested Not Provided
Frederick T. Weiss 3 Indian Gulch Road, Piedmont, CA 94611	10/06/00	10/06/00	0	20.00	Retired Chemist
Louise Wilson 235 Churchill Ave, Palo Alto, CA 94301	10/05/00	10/06/00	0	100.00	Retired Social Worker
Boris Volper 660 Woodside Drive, Woodside, CA 94062	12/06/00	10/06/00	0	50.00	Realtor Volper Ltd.

.....
PMS-2 1.6-2 2 Senate Trans Funds
Batch 0 : 3000V

Transmittal Report

DATE : 05-OCT-88
Page : 00073

.....
MS. Michelle Carrier
Herb Kohl for U.S. Senate
825 North Jefferson Street
Milwaukee, WI 53202
.....

Contributions Intended for Receipt by _____

NAME / ADDRESS OF CONTRIBUTOR	DATE-REC	DATE-PAY	\$	AMOUNT	OCCUPATION / BUSINESS
Lois Young 100 San Jose Court, San Luis Obispo, CA 93401	10/05/88	10/05/88	\$	10.00	retiree

Sub-Total Page 00073 \$ 10.00

Sub-Total 3000K \$ 7,260.00

8300403080790

Contributions intended for receipt by _____

Name / Address of Contributor	Date-Rec	Date-Pay	0	Amount	Occupation / Business
Miriam J. V. Anovos 200 East Highland Road, Baltimore, MD 21210	10/20/88	10/21/88	0	500.00	Rabbi
Richard E. Harrison 3203 Woodland Avenue, Western Springs, IL 60550	10/20/88	10/21/88	0	100.00	Salesman Self-employed
Aron Bernstein 67 Highland Avenue, Cambridge, MA 02139	10/20/88	10/21/88	0	50.00	Professor M.I.T.
Stephen T. Cray PO Box 6, Lyme, NH 03768	10/20/88	10/21/88	0	105.00	Retired Professor Prof Emeritus-Drew U
Eate Culver 2 Baker Bridge Road, Lincoln, MA 01773	10/20/88	10/21/88	0	25.00	Home Management Self-employed
Alice H. Engelbach 7499 Round Avenue, Jacksonville, IL 62650	10/20/88	10/21/88	0	50.00	Housewife
Richard Gabel 3401 S Utah Street, Arlington, VA 22204	10/20/88	10/21/88	0	20.00	retired
Jasna H. Goldberg 6207 Maniet Crest, Jamesville, NY 13078	10/20/88	10/21/88	0	25.00	Professor Syracuse University
Arnold Golodetz MD 47 Kingsland Terrace, Burlington, VT 05401	10/20/88	10/21/88	0	200.00	Physician-retired
Murray Greenberg 132 E Broadway 06-1704, New York, NY 10002	10/20/88	10/21/88	0	15.00	teacher Baruch College
Rochelle F. Grossman 84-54 Baxter Avenue, 820, Elmhurst, NY 11373	10/20/88	10/21/88	0	25.00	Retired
Judith C. Hafflach 20 Buno Drive, Chatham, MA 02633	10/20/88	10/21/88	0	10.00	Housewife
Sydil Holtzer 3542 Hamilton Street, Philadelphia, PA 19104	10/20/88	10/21/88	0	100.00	Information Requested Not Provided
Marion P. Hyman P.O. Box 240, Market Station, Buffalo, NY 14216-0240	10/20/88	10/21/88	0	50.00	Housewife

Sub-Total Page 00014 0 1,325.00

Contributions intended for Receipt by Kohl

Name / Address of Contributor	Date-Rec	Date-Pay	Amount	Occupation / Business
Mrs Willers 20 Whit's End Road, Concord, MA 01742	10/20/00	10/21/00	0 100.00	Information Requested Not Provided
Ronala Wasserman 2204 Manchester, Ann Arbor, MI 48104	10/20/00	10/21/00	0 25.00	Information Requested Not Provided
Fay B. Walls 46 Usonia Road, Pleasantville, NY 10570	10/20/00	10/21/00	0 30.00	Retired
Harold Weiss 1100 Drop Forge Lane, Reston, VA 22091	10/20/00	10/21/00	0 30.00	Physician SAGE Technologies
Constance Williams 18 Bedford Court, Bedford, MA 01730	10/20/00	10/21/00	0 30.00	retired city planner

63020032

Sub-Total Page 00017 0 235.00
Sub-Total 59000 0 2,005.00

Contributions Intended for Receipt by L. Chel

Name / Address of Contributor	Date-Rec	Date Pld	Amount	Occupation / Business
Guy C. Quinlan 200 Park Ave., Rm. 5200, New York, NY 10166	10/20/88	10/21/88	0 25.00	Lawyer-Rogers and Wells Rogers and Wells
Donald A. Ross 978 Beelers Rd., Yardley, PA 19067-4603	10/20/88	10/21/88	0 100.00	Director of Clinical Develop. Johnson & Johnson
Richard Ricely 77 Honduras Isle, Ft. Lauderdale, FL 33301	10/20/88	10/21/88	0 20.00	property manager Father
Arnold G. Bitterband 915 Northumberland Drive, Schenectady, NY 12309	10/20/88	10/21/88	0 20.00	Physician
Alvin O. Ross 2 Windswept Lane, E Setauket, NY 11733	10/20/88	10/21/88	0 20.00	Professor State University of New Y
Marc Ross 350 Martin Place, Ann Arbor, MI 48104	10/20/88	10/21/88	0 100.00	professor University of Michigan
Ann Shafer 10432 Ten Mile Road, Battle Creek, MI 49017	10/20/88	10/21/88	0 20.00	County Commissioner Calhoun County, MI
JAMES O. Siegel 109 Franklin Street, Newton, MA 02158	10/20/88	10/21/88	0 20.00	Information Requested Not Provided
Judy W. Saffier 8 Termakay Drive, New City, NY 10954	10/20/88	10/21/88	0 20.00	Homemaker
Elizabeth R. Starlevant 20 Wakefield Road, Branford, CT 06403	10/20/88	10/21/88	0 50.00	Information Requested Not Provided
Martha Taft 22 Oakhill Rd., Wayland, MA 01778	10/20/88	10/21/88	0 10.00	Information Requested Not Provided
Frank Teagle Jr. PO Box 329, Woodstock, VT 05091	10/20/88	10/21/88	0 50.00	Retired
Henry Trapp 99 Sunset Drive, New Hope, PA 18938	10/20/88	10/21/88	0 15.00	Hydrologist
John Tutour 1393 Green Valley Road, Napa, CA 94558	10/20/88	10/21/88	0 25.00	Assessor Napa County
	Sub-Total	Page 00016	0 515.00	

Contributions intended for Receipt by Froh

Name / Address of Contributor	Date-Rec	Date-Pay	0	Amount	Occupation / Business
Thomas J. Sans 2 Van Rensselaer Avenue, Stamford, CT 06902	10/20/88	10/21/88	0	20.00	Executive Sans & Sons
Arjann I. Levine MD 28 Wilson Ave, Southington, CT 06083	10/20/88	10/21/88	0	25.00	Physician
Morris Meehan 7280 Milvers Ave, Philadelphia, PA 19151	10/20/88	10/21/88	0	10.00	retired
Raymond Hester 815 Rockdale Circle, Lombard, IL 60148	10/20/88	10/21/88	0	25.00	retired
Walter T. Nyberg 1234 31st Avenue South, Minneapolis, MN 55417	10/20/88	10/21/88	0	200.00	Retired
Lucille Olson 7045 Bryant Avenue S 0200, Minneapolis, MN 55409	10/20/88	10/21/88	0	20.00	retired
Jack L. Paradise MD 4211 Bigelow Blvd, Pittsburgh, PA 15213	10/20/88	10/21/88	0	20.00	Physician University of Pittsburgh
Robert E. Parkinson Paine Hollow Road, Rd 2, Wallingford, MA 02647	10/20/88	10/21/88	0	20.00	Retired Chemist
Ruth H Penner 5426 Bromwich Drive, Dayton, OH 45426-1914	10/20/88	10/21/88	0	15.00	Retired Social Worker
Stefan Peters 80 Upland Road, Cambridge, MA 02140	10/20/88	10/21/88	0	25.00	Actuary MA Div of Insurance
Robert Plonsey 613 Kensington Drive, Chapel Hill, NC 27514-2031	10/20/88	10/21/88	0	20.00	Professor Duke University
Esther C. Penock Route 2, Box 1200, Putney, VT 05344	10/20/88	10/21/88	0	20.00	Farming
Eugene Prange 303 Sumner Street, E Boston, MA 02128	10/20/88	10/21/88	0	20.00	retired
William H. Preston 131 Weston Road, Lincoln Center, MA 01773	10/20/88	10/21/88	0	200.00	Retired

Sub-Total Page 00015 0 700.00

Contributions intended for receipt by total

Name / Address of Contributor	Date-Rec	Date-Pay	Amount	Occupation / Business
Shelley Berlin 320 East 64th Street, New York, NY 10022	10/20/68	10/21/68	30.00	Head of Household
Bartram, Staff 1100 Madison Ave, New York, NY 10028	10/20/68	10/21/68	10.00	Physician self-employed
Irving Garraw Worme MD 62-53 164 Street, Jamaica, NY 11432	10/20/68	10/21/68	25.00	Physician

Sub-Total Page 00006 65.00
Sub-Total 00006 622.00

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Contributions intended for receipt by Fohl

NAME / Address of Contributor	Date-Rec	Date-Pay		Amount	Occupation / Business
Robert L. Blane Jr 2322 Meadow Lark Lane, Columbia, MD 21031	10/20/88	10/21/88	0	20.00	physician, U. of MD
Ralph Clark 4307 N 30th Street, Arlington, VA 22207	10/20/88	10/21/88	0	100.00	retired
Roger Gilmore 4371 Central Ave, Western Spgs, IL 60558	10/20/88	10/21/88	0	20.00	college admin. Art Institute of Chicago
Eoger Grossman 40 Wendell Road, Newton Center, MA 02159	10/20/88	10/21/88	0	50.00	Treasurer Med. Envelope Co.
Richard A. Morvitz 7610 Lima Hollow Se, Grand Rapids, MI 49506	10/20/88	10/21/88	0	50.00	Information Requested Not Provided
Elliot Hubbard Ste 14 Winter Street, Lincoln, MA 01773	10/20/88	10/21/88	0	150.00	Retired
Dorothy Lazar 806 Southern Avenue, Dubuque, IA 52001	10/20/88	10/21/88	0	20.00	Information Requested Not Provided
Don E. Morhain 422 Garrison Forest Road, Owings Mills, MD 21117	10/20/88	10/21/88	0	20.00	physician Professional Emergency Physi
Edna T. Roman 1308 Denniston Avenue, Pittsburgh, PA 15217	10/20/88	10/21/88	0	75.00	physicist University of Pittsburgh
Egar A. Pearstein 532 Eastborough Lane, Lincoln, NE 68505	10/20/88	10/21/88	0	50.00	Professor Univ. of Nebraska
Terry Platt 1340 Highland Avenue, Rochester, NY 14620	10/20/88	10/21/88	0	50.00	teacher Univ. of Rochester Med. C
Helen H. Prince 1644 S Bryant St, Denver, CO 80219	10/20/88	10/21/88	0	2.00	Clerical County Court
Mary Schmid 20 School Street, Hanover, NH 03755	10/20/88	10/21/88	0	75.00	retired
Barbara Scherzschli 12 Ober Road, Princeton, NJ 08540	10/20/88	10/21/88	0	125.00	housewife

Sub-Total Page 00025 8 857.00

Contributions intended for receipt by John

Name / Address of Contributor	Date-Paid	Date-Paid	Amount	Occupation / Business
Earl Weigl 264 Cannon Street, San Francisco, CA 94107-2345	10/19/68	10/20/68	50.00	Information Requested Not Provided
George B. Worden 155 North 3rd Street, Olybia, CA 92223	10/19/68	10/20/68	15.00	Retired
Irene H. Womers 1423 W. 46th St. SE, Bismarck, IA 52004	10/19/68	10/20/68	20.00	Retired
Elizabeth W. Zall 1711 Leman Street, South Pasadena, CA 91030	10/19/68	10/20/68	15.00	Librarian Huntington Library
	Sub-Total	Page 00005	97.00	
	Sub-Total	00000	97.00	

8302020320

Contributions intended for receipt by Fohl

Name / Address of Contributor	Date-Rec	Date-Pay	Amount	Occupation / Business
Berolby B. Perkins Stanford Univ, Biology Dept, Stanford, CA 94305	10/19/68	10/20/68	0 200.00	Biologist Stanford University
Engene F. Peterson POBox 73400, Honolulu, HI 96826-0400	10/19/68	10/20/68	0 10.00	retired
Charles Rosen 20 Biogo Road, Uxalan, MA 02166	10/19/68	10/20/68	0 200.00	Information Requested Not Provided
John Rosenberg 1002 Guerrero Street, San Francisco, CA 94110	10/19/68	10/20/68	0 20.00	Computer Programmer U. C. S. F.
Wayne Sklar 22125 Dean Court, Cupertino, CA 95014-2723	10/19/68	10/20/68	0 20.00	Information Requested Not Provided
Martin Thrope 840 Gray Street, Arlington, MA 02174	10/19/68	10/20/68	0 25.00	Information Requested Not Provided
Peter H Von Hippel 1000 Cross Drive, Eugene, OR 97403	10/19/68	10/20/68	0 50.00	professor University of Oregon
Margery T. Ware 6300 East Halbert Road, Bethesda, MD 20817	10/19/68	10/20/68	0 20.00	retired
Carl Weisberg 310 East Sixth Street, Northfield, MN 55057	10/19/68	10/20/68	0 10.00	Professor Carleton College
F. W. Went 33775 SW Old Scholls Ferry Rd, Beaverton, OR 97005	10/19/68	10/20/68	0 200.00	professor emeritus Univ of WY
Don Wittanen 2000 London Road, Apt 110, Duluth, MN 55804	10/19/68	10/20/68	0 10.00	Retired Business Consultant

Sub-Total Page 00010 0 845.00

Sub-Total 8994K 0 1,250.00

TRIMESTRAL REPORT
 CONTRIBUTOR CONTRIBUTIONS

Contributions intended for receipt by Kell

NAME / ADDRESS OF CONTRIBUTOR	DATE-REC	DATE-PAY	AMOUNT	OCCUPATION / BUSINESS
Jonathan Altman 511 Camino Real, Santa Fe, NM 87501	10/19/88	10/20/88	50.00	Artist Self-employed
Jane Griffin 20 Greencrest, Champaign, IL 61821	10/20/88	10/20/88	50.00	Retired
Royal L. Brockway 9720 Cove Drive 0270, North Royalton, OH 44133	10/19/88	10/20/88	5.00	Retired
Stuart E. Collie 20 Stanfield Street, New Britain, CT 06053	10/19/88	10/20/88	10.00	Retired Professor
Richard E. Friedlander 444 Woodridge Road, Gaysville, CA 95441	10/19/88	10/20/88	20.00	Retired
Tom O. Gilbert Pinecone Dr, Westbrook, CT 06498	10/19/88	10/20/88	20.00	Programmer
Robert Alan Mueller 1329 6th Street, Boulder, CO 80306-8123	10/19/88	10/20/88	15.00	Teacher Putnam City Schools
Barbara A. Johnson 3704 NW 87th, Oklahoma City, OK 73132	10/19/88	10/20/88	10.00	Housewife
Mary B. Kiefer 4339 Brainard Rd, Chagrin Falls, OH 44022	10/19/88	10/20/88	50.00	Retired
Charlotte Lichterman 3557 Hilgard Ave., Berkeley, CA 94709	10/19/88	10/20/88	10.00	Retired teacher
Lillian P. Long 1025 Longleaf Circle, Monroeville, AL 36460	10/19/88	10/20/88	20.00	Professor San Bernardino Comm. Collie
Terry Hunt 6155 Bluffwood Drive, Riverside, CA 92506	10/19/88	10/20/88	30.00	Retired
Clare Millikan 60 Kingston Road, Kensington, CA 94707	10/19/88	10/20/88	15.00	Maintenance repairs
J. M. Rufus 5643 Brooklyn Ave NE, Seattle, WA 98105				

Sub-Total Page 00013 345.00

Contributions intended for receipt by Field

Name / Address of Contributor	Date-Rec	Date-Pay	\$ Amount	Occupation / Business
Elaine Allen MD 47 Cortina Place, Staten Island, NY 10301	10/13/68	10/14/68	\$ 20.00	physician
Henry B. Saliba 540 Evergreen Dr., Morristown, NJ 08857	10/13/68	10/14/68	\$ 10.00	Information Requested Not Provided
John F. Faxon 1510 South 272nd, Kent, WA 98032	10/13/68	10/14/68	\$ 2.00	Engineer-Animal Lab, Seattle
William A. Cannon 870 61 Box 15A, Chilmark, MA 02535	10/13/68	10/14/68	\$ 20.00	Sociologist Boston College

Sub-Total Page 00000 \$ 82.00
Sub-Total 00000 \$ 82.00

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Contributions intended for receipt by Koll

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Name / Address of Contributor	Date-Rec	Date-Pay	\$	Amount	Occupation / Business
Lawrence Berger 210-22 60th Avenue, Bayside, NY 11364	10/17/00	10/18/00	0	10.00	Retired
Lester A. Eirhemall 43706 SE River Road Apt 700-C, Portland, OR 97222	10/17/00	10/18/00	0	20.00	Retired
Walter V. Gonn 226 Farman Road, Haverloun, PA 19063-0725	10/17/00	10/18/00	0	25.00	Retired
Michael Larkin 4715 Beverport Avenue, Oakland, CA 94619	10/17/00	10/18/00	0	20.00	Teacher Oakland Schools
Joan B. Marks 6646 SW Petaluma Hill Road, Portland, OR 97219	10/17/00	10/18/00	0	100.00	Professor Oregon Health Science Uni
Eivyn Kay Packham 3046 Park Street, San Francisco, CA 94109	10/17/00	10/18/00	0	50.00	Taxi Driver Self
Agnes Priody 125 Voorhis Avenue, Rockville Center, NY 11570	10/17/00	10/18/00	0	10.00	Housewife
Marilie Robertson 24306 Sarousbury Cir., Canoga Park, CA 91307	10/17/00	10/18/00	0	15.00	Teacher L.A. Unified School Distr
Mary E. Russell 1942 Camino del Sol, Sun City West, AZ 85375	10/17/00	10/18/00	0	10.00	retired
Murray Scheibe 1133 Palomide Rd, Santa Barbara, CA 93105	10/17/00	10/18/00	0	15.00	Information Requested Not Provided
John V. Spence 1565 Vinton, Memphis, TN 38104	10/17/00	10/18/00	0	30.00	investor-farmer
R. E. Wilson W 2301 Clark Avenue, Spokane, WA 99201	10/17/00	10/18/00	0	15.00	Information Requested Not Provided

Sub-Total Page 00033 0 320.00

Sub-Total 00000 0 320.00

Contributions Intended for Receipt by Kohl

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Name / Address of Contributor	Date-Rec	Date-Pay	\$ Amount	Occupation / Business
Frank C. Andrews 1025 Lombard Street, Santa Cruz, CA 95060	10/17/88	10/18/88	0 60.00	Professor Univ of California
D. B. Armstrong 2036 Sundance Square, Boulder, CO 80301	10/17/88	10/18/88	0 20.00	Electrical Engr AT&T I.C.
Ernest Beckir 5711 Warm Springs Road, Houston, TX 77033	10/17/88	10/18/88	0 10.00	Geophysicist
Earl L. Bridges 1713 B. Patton Avenue, San Pedro, CA 90731	10/17/88	10/18/88	0 25.00	Retired
Arthur W. Briston Rd 1 - Monticello Edge, Ludlow, VT 05140	10/17/88	10/18/88	0 20.00	Retired
John C. Brown 316 Grace Ave, 03, Ingleswood, CA 90301	10/17/88	10/18/88	0 5.00	UMCR Retired
G. G. Campbell 2317 Hawthorne Drive, Amarillo, TX 79109-4920	10/17/88	10/18/88	0 1000.00	Retired
Joel Douglas PO Box 5426, Kalamazoo, MI 49045	10/17/88	10/18/88	0 25.00	Retired
Louis V. Ernest 2623 Kenwood Street, Salt Lake City, UT 84106	10/17/88	10/18/88	0 5.00	retired
Bernard D. Fischman Shaw & Gould, New York, NY 10020-1193	10/17/88	10/18/88	0 20.00	Information Requested Not Provided
Lucille E. Flood Box 637, Paradise, CA 95969	10/17/88	10/18/88	0 125.00	Information Requested Not Provided
Mildred Gardner 210 Birch Drive, Roslyn, NY 11576	10/17/88	10/18/88	0 25.00	Librarian Five Towns College
Gloria Green 805 Buckingham Drive, Silver Spring, MD 20901	10/17/88	10/18/88	0 5.00	Homemaker
Louis C. Green 791 College Avenue, Haverford, PA 19041	10/17/88	10/18/88	0 100.00	retired professor
Sub-Total			0 1,485.00	

reduced

Contributions intended for Receipt by Kishi

03020203210123

Name / Address of Contributor	Date-Rec	Date-Pay	0	Amount	Occupation / Business
Emy P. Allen 1100 Sharon Park Drive 00, Rancho Park, CA 94023	10/14/88	10/14/88	0	20.00	Retired
Charles Bloomer Jr 1001 Gilroy Drive, Concord, CA 94510	10/14/88	10/14/88	0	10.00	Retired
Nancy Boyce 2022 Evelyn Avenue, San Leandro, CA 94577	10/14/88	10/14/88	0	12.00	Retired
Robin Brooks 600 Kennedy Dr, Capitola, CA 95010	10/14/88	10/14/88	0	20.00	professor San Jose State Univ.
Don Buchanan 20 East Billito St. USA, Tucson, AZ 85705	10/14/88	10/14/88	0	3.00	Groundskeeper Self-employed
Don H. Clarno 1337 Oriole Lane, Los Angeles, CA 90040	10/14/88	10/14/88	0	20.00	retired
Gilbert Cohen 73 State Street, Springfield, MA 01103	10/14/88	10/14/88	0	25.00	Executive Century Investment Co.
Jan Gist 4474 Anita Street 04, Long Beach, CA 90815	10/14/88	10/14/88	0	10.00	professor of voice & speech Cal State Univ. Long Beach
Jeanne M. Grether 1017 Cypress Drive, Fort Collins, CO 80521	10/14/88	10/14/88	0	10.00	Information Requested Not Provided
John Gruba 2077 Queensberry Rd, Pasadena, CA 91104-3354	10/14/88	10/14/88	0	20.00	Scientist Psychogen
Merry Haisley 2444 Golden Ave, Long Beach, CA 90804	10/14/88	10/14/88	0	10.00	Information Requested Not Provided
Marilyn H. Hutter MD 25 Corte Ledate, Greenbrae, CA 94904	10/14/88	10/14/88	0	25.00	physician
Viva C. Irwin 250 E Alameda Apt 620, Santa Fe, NM 87501	10/14/88	10/14/88	0	20.00	retired
S. H. Kaiman 2200 Tasso Street, Palo Alto, CA 94301	10/14/88	10/14/88	0	20.00	Professor Stanford Univ.

Sub-Total Page 00018 0 325.50

Contributions intended for receipt by Y. J. J.

03030212

Name / Address of Contributor	Date-Rec	Date-Pay	\$ Amount	Occupation / Business
James E. Abick 2310-C Royal Pines Circle, Clearwater, FL 34623-0113	10/14/80	10/14/80	0 10.00	Retired
Art (A) Angloff 4034 1st Avenue NE, Seattle, WA 98105	10/14/80	10/14/80	0 15.00	Retired
Shepherd Brooks 24 Berkeley Street, Cambridge, MA 02138	10/14/80	10/14/80	0 50.00	Information Requested Not Provided
James Clario 2305 Balfour Street, Denver, CO 80207	10/14/80	10/14/80	0 100.00	professor Univ of Denver
Mary Bruce Deibrock 1510 Oakdale Street, Pasadena, CA 91106	10/14/80	10/14/80	0 200.00	Housewife
Morton Z. Faiman 11200 Nuneata Street, Los Angeles, CA 90049	10/14/80	10/14/80	0 10.00	Retired chemist self-employed
Gloria S. Kaplan 6363 Christie Ave 92504, Emeryville, CA 94608	10/14/80	10/14/80	0 25.00	Legal Secretary Coblenz Cohen McCabe & S
Irene Katz 611 Elm Street, El Cerrito, CA 94530	10/14/80	10/14/80	0 3.75	teacher
Joseph V. Langford 1290 S East Street, Amherst, MA 01002	10/14/80	10/14/80	0 25.00	retired teacher
Edward S. Lewis 805 Winthrop Road, San Marino, CA 91108	10/14/80	10/14/80	0 50.00	college professor Cal. Tech
Robert B. Livingston USCB H-624, La Jolla, CA 92093	10/14/80	10/14/80	0 30.00	Professor UCSD
Florence Malcolm 1009 54th Street, Oakland, CA 94608	10/14/80	10/14/80	0 15.00	Retired teacher
Dele D. Nesbitt 1712 Marin Avenue, Berkeley, CA 94707	10/14/80	10/14/80	0 250.00	Engineer U of C (LBL)
U. L. Parker 434 Pope Street, San Francisco, CA 94112	10/14/80	10/14/80	0 10.00	Editor Self-employed

Contributions intended for receipt by Field

Name / Address of Contributor	Date-Rec	Date-Pay		Amount	Occupation / Business
Ralph Knight 608 E Dale Street, Colorado Springs, CO 80903	10/07/68	10/14/68	0	100.00	Appraiser Self-employed
Harbert Offner 248 Coronado Avenue, Long Beach, CA 90803	10/07/68	10/14/68	0	100.00	Retired
John W. Coveringham MD U Cal Med Center, Box 1306, San Francisco, CA 94143	10/07/68	10/14/68	0	50.00	Physician U. Cal. Med. S. F.
Lewis Shalmer 101 Morning Sun Avenue, Mill Valley, CA 94041	10/07/68	10/14/68	0	50.00	professor U.C.S.F.
Alan Storey 7022 Wilshire Blvd., Suite 201, Los Angeles, CA 90036	10/07/68	10/14/68	0	50.00	Attorney
Dr. L. Stein 149 Red Gate Lane, Amherst, MA 01002	10/07/68	10/14/68	0	25.00	Professor of Botany
Stephen L. Tallor 743 Spruce Street, Berkeley, CA 94707	10/07/68	10/14/68	0	25.00	M.D. TMS INC
	Sub-Total	Page 00020	1	400.00	
	Sub-Total	90462	1	400.00	

0
2
0
3
0
8

Contributions released for receipt by Kelch

Name / Address of Contributor	Date-Rec	Date-Pay	Amount	Occupation / Business
Bela Maday 1361 E Cypress, Glendora, CA 91740	10/17/88	10/18/88	0 100.00	EM, Coordinator With One Pennon State Dist
Lucy Mosnier 1125 Felix Street 06, Santa Cruz, CA 95060	10/17/88	10/18/88	0 20.00	Retired
Robert Malicious 31026 Huntley Square East, Birmingham, MI 48009	10/17/88	10/18/88	0 20.00	retired
Robert T. Hart 6428 Westchester Pt. Dr. 0302, College Park, MD 20740	10/17/88	10/18/88	0 20.00	teacher P.S. Co. Public Schools
14 1 2 3 0 0 C 0 0 3 8 Judith A. Humphreys P O Box 917, Santa Monica, CA 90406	10/17/88	10/18/88	0 20.00	retired
Tom Humphreys 2139 Chamberlain Street, Honolulu, HI 96822	10/17/88	10/18/88	0 20.00	scientist Univ Of Hawaii
Albert Kaspin 1410 Paseo Del Ocaso, Santa Barbara, CA 93103	10/17/88	10/18/88	0 25.00	Professor--retired
Robert L. Kenngett 8 Highview Terrace, Pleasantville, NY 10570	10/17/88	10/18/88	0 20.00	Retired
Charles L. Korstein 845A Heritage Village, Southbury, CT 06488	10/17/88	10/18/88	0 20.00	Retired
Marion S. Kundiger 804 More Street, Manhattan, KS 66502	10/17/88	10/18/88	0 20.00	Biology Instructor Kansas State University
Elizabeth Langenkamp Fieldcrest Road, Sister Bay, WI 54234	10/17/88	10/18/88	0 15.00	retired
Irmgard Lenel 829 11th Street 03, Santa Monica, CA 90403-1630	10/17/88	10/18/88	0 20.00	retired
Nobum Lewis 2 Birch Hill Road, Loudonville, NY 12211	10/17/88	10/18/88	0 15.00	Self-employed Bearing Distributors
Barbara Miller 30 Usonia Road, Pleasantville, NY 10570	10/17/88	10/18/88	0 20.00	homemaker

Contributions returned for receipt by Kobli

Name / Address of Contributor	Date-Rec	Date-Pay	Q	Amount	Occupation / Business
Stuart Gekamp Claremont Graduate School, Claremont, CA 91711	10/10/68	10/10/68	Q	20.00	Professor Claremont Grad School
	Sub-Total:	Page 0000	Q	20.00	
	Sub-Total:	0000	Q	20.00	

8 3 0 2 0 2 0 3 2 1 5

Contributions intended for receipt by Kalk

Name / Address of Contributor	Date-Rec	Date-Paid	C	Amount	Occupation / Business
Arthur A. Benson II 2637 Campbell Street, Kansas City, MO 64109	10/10/00	10/10/00	0	30.00	attorney self-employed
Richard H. Goodwin PO Box 2040, Salem, CT 06415	10/10/00	10/10/00	0	30.00	retired professor
Eurt A. C. Hannon 4704 W. Stamen Drive, Everett, WA 98203	10/10/00	10/10/00	0	30.00	Retired
Betty Silverman PO Box 42, Badger, CA 93603	10/10/00	10/10/00	0	7.00	retired
Livia S Szekely 343 W 'B' St, Springfield, OR 97477	10/10/00	10/10/00	0	30.00	Information Requested Not Provided
	Sub-Total	Page 00010	0	107.00	
	Sub-Total	5000K	0	107.00	

030203216

Contributions intended for Receipt by Kohle

8 0 0 0 0 3 2 1 7

Name / Address of Contributor	Date-Rec	Date-Pay		Amount	Occupation / Business
V. Dale Carlson 1133 Veranda Drive, Cupertino, CA 95014	10/14/88	10/14/88	0	25.00	Computer programmer Kerox
Martin Ledowitz 700 West J Street, San Jose, CA 95110	10/14/88	10/14/88	0	15.00	physician self-employed
Elliott Levinthal 50 Sutherland Drive, Atherton, CA 94025	10/14/88	10/14/88	0	100.00	physicist Stanford University
George G. McEllion 101 Westfield Circle, San Jose, CA 95128	10/14/88	10/14/88	0	30.00	Teacher
Robert S. Means 1421 Yellowstone Ave., Milpitas, CA 95035	10/14/88	10/14/88	0	30.00	Programmer Amahi Corp.
Mary Nicholson 3785 Wright Place, Palo Alto, CA 94306	10/14/88	10/14/88	0	10.00	psychologist Oak Grove School District
James A. Norton 4138 N. Pennsylvania, Indianapolis, IN 46205	10/14/88	10/14/88	0	30.00	professor Ind University Med Center
John J. O'Hare 16289 Greenwood Road, Monte Sereno, CA 95020	10/14/88	10/14/88	0	10.00	retired
Harvin P. Osman MD 316 South McCarty Drive, Beverly Hills, CA 90212	10/14/88	10/14/88	0	30.00	Physician self-employed
C. May Overton 543 Glenwood Avenue, Prescott, AZ 86303	10/14/88	10/14/88	0	30.00	retired mission teacher
Sam Raber 5300 Newcastle 043, Encino, CA 91310	10/14/88	10/14/88	0	10.00	retired
Sam Raber 5300 Newcastle 043, Encino, CA 91310	10/14/88	10/14/88	0	30.00	retired
Gerry W. Reece 2814 Thornwood Drive, Sacramento, CA 95821	10/14/88	10/14/88	0	10.00	Information Requested Not Provided
Lloyd Reeves POBox 0900, Los Osos, CA 93412	10/14/88	10/14/88	0	30.00	Information Requested Not Provided

Sub-Total Page 00010 0 430.00

Contributions intended for receipt by Kohl

000003218

Name / Address of Contributor	Date-Roc	Date-Pay	0	Amount	Occupation / Business
Albert Swerlow 3100 Partridge Lane 020, Farmington HI, HI 00016-3061	10/17/80	10/18/80	0	20.00	Engineer Component Tech Inc.
Richard H. Tallaforte Jr. 3219 S 10th Road, Arlington, VA 22204	10/17/80	10/18/80	0	20.00	Teacher/Commissioner/Administr St Stephen's School
Malen H. Tapperman 7004 Stoneledge Lane, Manlius, NY 13164	10/17/80	10/18/80	0	20.00	Retired
Duane R. Terry 113 Presidential Drive, GA, Greenville, DE 19007-3203	10/17/80	10/18/80	0	20.00	retired
Tom Trilling 3240 Inglewood Blvd, Los Angeles, CA 90064	10/17/80	10/18/80	0	10.00	Information Requested Not Provided
Ann B. Valentini 1633 N 52nd Street 009, Jacksonville, OR 97330	10/17/80	10/18/80	0	10.00	retired
Marion S. Vachtel 2642 Magnolia Drive, Palo Alto, CA 94306	10/17/80	10/18/80	0	10.00	Retired
Robert Weinlock 171 East College Street, Oberlin, OH 44074	10/17/80	10/18/80	0	100.00	professor emeritus Oberlin College
Albert E. Whitford 220 Morrissey Blvd., Santa Cruz, CA 95062	10/17/80	10/18/80	0	20.00	Retired astronomer
Grace H Williams 27 Cypress Way, Rolling Hills Es, CA 90274	10/17/80	10/18/80	0	15.00	Information Requested Not Provided
Berolby H. Wilson 21 Hillside Terrace, Belmont, MA 02170	10/17/80	10/18/80	0	20.00	Information Requested Not Provided
Gordon J. Wozniak 141 Parkside Drive, Berkeley, CA 94705	10/17/80	10/18/80	0	100.00	Scientist Lawrence Berkeley Lab

Sub-Total Page C9016 0 473.00
 Sub-Total 900ME 0 3,443.22

Contributions intended for receipt by Kohl

8303219

Name / Address of Contributor	Date-Rec	Date-Pay	Amount	Occupation / Business
Waldemar Schmitz 1908 South 72nd Street, West Allis, WI 53219	10/17/68	10/18/68	20.00	Retired
Ferrant E. Scott 4801 Massachusetts Avenue NW, Washington, DC 20016	10/17/68	10/18/68	25.00	Retired
Robert Scott 2770 Pleasant Hill Road, 0120, Pleasant Hill, CA 94523	10/17/68	10/18/68	20.00	Retired
Donald J. Saldon 3000 Spad Place, Silver City, CA 96230	10/17/68	10/18/68	20.00	Information Requested Not Provided
Alfred Sheets 1801 Anapa Place, Miami, FL 33133	10/17/68	10/18/68	100.00	Retired
Ray Short 305 South Miller, Lafayette, CO 80006	10/17/68	10/18/68	285.22	Professor, author, lecturer U of Wisconsin
Michael F. Silver 7301 Myrtle Vista Avenue, Sacramento, CA 95831	10/17/68	10/18/68	20.00	Education consultant State of California
Dorcas M. Smith 4120 Natty Dr, Concord, CA 94521	10/17/68	10/18/68	10.00	Information Requested Not Provided
Dorothy B. Smith 1627 Copperfield, San Antonio, TX 78231	10/17/68	10/18/68	25.00	retired teacher
William B. Spofford 1800 Shaw Mountain Road, Boise, ID 83712-6636	10/17/68	10/18/68	20.00	Tutor Self-employed
Andy Starr 6281 Garvie Hill Road, Danville, NV 14427	10/17/68	10/18/68	20.00	real estate
C. H. Steindorger Box 441, Storrs, CT 06269	10/17/68	10/18/68	20.00	Retired
Bertram Stillier 1879 Wyandring Ave NW Apt 604, Washington, DC 20009	10/17/68	10/18/68	20.00	Retired
Andrew A. Sweet 1150 Cook Street, Denver, CO 80204	10/17/68	10/18/68	15.00	Psychologist Self-employed

Contributions intended for receipt by Kohl

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Name / Address of Contributor	Date-Rec	Date-Pay	0	Amount	Occupation / Business
Florence J Miller 543 Bayton Ave, San Antonio, TX 78210	10/17/80	10/18/80	0	10.00	Information Requested Not Provided
Edith B. Morales 1220 30th Street West, Bradenton, FL 34209	10/17/80	10/18/80	0	5.00	Retired
Boulard H. Gray 2300 Floral Hill Drive, Eugene, OR 97403	10/17/80	10/18/80	0	25.00	retired
Robert Panzer 7704 West 48th Place, Lyons, IL 60534	10/17/80	10/18/80	0	20.00	teacher Univ. of IL
Hugh H. Pondleton III 207 Florence Road, Waltham, MA 02154	10/17/80	10/18/80	0	20.00	physicist Brandeis University
Daniel Perlmutter 634 West Clivedon Street, Philadelphia, PA 19110	10/17/80	10/18/80	0	20.00	Professor Univ. Penn.
Jerome Pina 3445 Ellington Villa Drive, Altadena, CA 91001	10/17/80	10/18/80	0	20.00	physicist CalTech
Judith Rameyer 1320 Ward Avenue 6301, Honolulu, HI 96822	10/17/80	10/18/80	0	25.00	Physician University of Hawaii
Irving Rappaport 200 Waverly Road, Scarsdale, NY 10583	10/17/80	10/18/80	0	20.00	professor N. Y. Medical College
Frances P. Riley 4934 Arbor Ridge, San Antonio, TX 78228	10/17/80	10/18/80	0	15.00	Student
Carolyn Atlog Ross 8 Westminster Drive, Lake Oswego, OR 97034	10/17/80	10/18/80	0	50.00	Information Requested Not Provided
Alan Salaschi 2116 Harrison Street, Evanston, IL 60201	10/17/80	10/18/80	0	15.00	Information Requested Not Provided
Evelyn E. Schmirhorn 2510 Gardner Place, Glendale, CA 91206	10/17/80	10/18/80	0	50.00	teacher L.A.U.S.D.
Mitchell Schoenbrun 1133 Guerrero St, San Francisco, CA 94110	10/17/80	10/18/80	0	25.00	Information Requested Not Provided

Contributions intended for receipt by Kellu

Name / Address of Contributor	Date-Rec	Date-Pay	0	Amount	Occupation / Business
Richard Raimorson MD 1400 30th Street, Sacramento, CA 95810	10/14/88	10/14/88	0	25.00	Physician Self-employed
John D. Rice 1085 Amite Avenue, Berkeley, CA 94708	10/14/88	10/14/88	0	25.00	Retired
Naomi Rippl 604 Sanicla Drive 049, Santa Rosa, CA 95405-3007	10/14/88	10/14/88	0	25.00	Retired Teacher
Barbara C. Robson 5671 E. Whittier, Tucson, AZ 85711	10/14/88	10/14/88	0	30.00	Information Requested Not Provided
Phyllis Rosendorn 114 Camino Del Sol, Santa Cruz, CA 95065	10/14/88	10/14/88	0	30.00	Data Processing Supervisor
Evelyn Schaefer 32 Crest Road, San Anselmo, CA 94960	10/14/88	10/14/88	0	30.00	Information Requested Not Provided
Thomas Schofer 10610 East Estates Drive, Cupertino, CA 95014	10/14/88	10/14/88	0	90.00	Programmer VLSI Technology, Inc.
Marvin V. Schlegel 476 Limborn Drive, Virginia Beach, VA 23451	10/14/88	10/14/88	0	20.00	Retired
Robert E. Schreiner 1440 East Quincy Ave, Englewood, CO 80110	10/14/88	10/14/88	0	20.00	Real estate author
Bernard Seinfeld 107 Pointsettia Gardens Dr, Ventura, CA 93004	10/14/88	10/14/88	0	15.00	cpa
Kathryn Smick 1115 Oakhill Road, Lafayette, CA 94549	10/14/88	10/14/88	0	30.00	Retired physician
Ronald B. Smith 10220 SE 21st, Bellevue, WA 98004	10/14/88	10/14/88	0	50.00	retired
Mary S. Snyder 870 Bay Road, Amherst, MA 01002	10/14/88	10/14/88	0	15.00	Secretary Amherst College
Berothy Stephens 1021 Arlington Rd, Redwood City, CA 94062	10/14/88	10/14/88	0	30.00	Information Requested Not Provided

Sub-Total Page 00020 0 425.00

03030303222

0 FTR-2.1.0-0
Date: 01/01

Contra Trans Form

Transmittal Report
EARNINGS CONTRIBUTIONS

Date: 10-OCT-88
Page: 00004

CONTRIBUTORS LISTED FOR RECEIPT BY Handwritten Signature

Name / Address of Contributor	Date-RET	Date-POS	0	Amount	Occupation / BUSINESS
Norm H. Proell 1200 Norfolk Avenue, West Sacramento, CA 95601	10/14/88	10/14/88	0	20.00	retired
Howard H. Tania 3067 Lane Mendota Dr., Madison, WI 53705	10/14/88	10/14/88	0	100.00	PROFESSOR / U of WIS
Mervin A. Weisberg MD 1077 Corte Gorda, Santa Fe, NM 87501	10/14/88	10/14/88	0	20.00	retired physician
H. Welch 10313 Pepper Street, Castro Valley, CA 94546	10/14/88	10/14/88	0	10.00	information requested not provided

Sub-Total Page 00004 0 170.00

Sub-Total 00004 0 043.75

830203223

EXHIBIT 2

Wisconsin Action Coalition Funding, 1986

90040300106

501 (c) PAC

TOTAL
DISBURSEMENTS

LABOR PAC
CONTRIBUTIONS

9
0
0
4
0
3
0
0
1
0
7

Citizen Action PAC \$37,600

Machinists..... (\$5,000)
 UAW (\$5,000)
 Engineers (\$5,000)
 Communications Workers ... (\$5,000)
 NEA (\$5,000)
 Cit/Labor Energy Coal..... (\$3,450)
 Nat'l. Coun. Sr. Citizens (\$2,000)
 Bakery, Confectionery (\$2,000)
 *
TOTAL \$37,450

* One \$5,000 PAC contribution missing from detailed pages of post-election report

Citizen/Labor Energy Coalition (CLEC) PAC \$16,000

Machinists..... (\$5,000)
 NEA (\$5,000)
 Communications Workers ... (\$3,000)
 Committee for Good Gov't (\$3,000)
TOTAL \$16,000

Wisconsin Action Coalition PAC \$14,823.94

Machinists..... (\$5,000)
 CLEC (\$5,000)
 Citizen Action (\$2,200)
 Citizens PAC* (\$2,300)
TOTAL \$14,500

*Same address as Citizen Action and CLEC, same Treasurer as Citizen Action. Contribution does not appear on Citizens PAC FEC report

Illinois Public Action Council PAC \$26,745.91

Machinists..... (\$5,000)
 * Lane Evans for Cong. (\$20,800)
TOTAL \$25,800

* Contribution appears to violate legal limits

90040300108

Pennsylvania Public Interest Coalition PAC \$10,992.95

Machinists (\$5,000)
CLEC (\$2,500)
Citizen Action (\$2,000)

TOTAL \$9,500

Washington Fair Share PAC \$37,522.10

Machinists (\$5,000)
AFSCME (\$3,000)
Wash. St. Labor Comm. (\$250)

TOTAL \$8,250

Maryland Citizen Action Coalition PAC \$360

AFSCME (\$300)
Stuart Bainum for Cong. (\$360)

TOTAL \$660

Citizen Action of Indiana PAC \$5,064.76

UAW (\$5,000)
Lodge 2040 Pae-Evansville (\$500)

TOTAL \$5,500

Ohio Public Interest Campaign PAC \$0

\$0

Florida Consumers Federation PAC \$0

\$0

Iowa Citizen Action Network PAC \$0

\$0

TOTAL CITIZEN ACTION DISBURSEMENTS \$149, 109.66 *\$111,587.56

TOTAL LABOR PAC CONTRIBUTIONS \$117,660.00 *\$109,410.00

PERCENT LABOR PAC MONEY 79% 98%

*Minus Washington Fair Share

EXHIBIT 3

WAC Activities

90040300109

National Labor's "Grassroots" Effort in Wisconsin

20040000110

**Machinists
PAC**

**NEA
PAC**

\$5,000 (12/6/85)
\$5,000 (3/6/86)

\$5,000 (5/9/86)
\$5,000 (9/24/88)

\$5,000 (10/7/86)

\$5,000 (10/7/85)

**Garvey
For Senate**

**Citizen
Action
PAC**

**CLEC
PAC**

\$14,371.19
Independent
Expenditures
Opposing
Sen. Kasten
(10/16 - 11/3)

\$2,200 (10/8/86)

\$5,000 (10/8/86)

**Wisconsin
Action Coalition
PAC**

\$5,000 (8/15/86)

EXHIBIT 4

Wisconsin Action Coalition Report, 1988

90040300111

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee
(Summary Page)

RECEIVED
FEDERAL ELECTION COMMISSION

88 SEP -9 PM 2:57

USE FEC MAILING LABEL
OR
TYPE OR PRINT

1. NAME OF COMMITTEE (in full) WISCONSIN ACTION CAMPAIGN PAC		2. FEC IDENTIFICATION NUMBER 030788
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported 152 W. WISCONSIN AVE SUITE 633		3. <input type="checkbox"/> This committee qualified as a multiscandidate committee DURING THIS Reporting Period on _____ (Date)
CITY, STATE and ZIP CODE MILWAUKEE, WI 53203		

4. TYPE OF REPORT

- (a) April 15 Quarterly Report
 July 15 Quarterly Report
 October 15 Quarterly Report
 January 31 Year End Report
 July 31 Mid Year Report (Non-election Year Only)
 Termination Report
- Monthly Report Due On
 February 20 June 20 October 20
 March 20 July 20 November 20
 April 20 August 20 December 20
 May 20 September 20 January 31
- Twelfth day report preceding PRIMARY
 (Type of Election)
 election on 9/13/88 in the State of WI
- Thirtieth day report following the General Election on _____
 in the State of _____
- (b) Is this Report an Amendment? YES NO

SUMMARY		COLUMN A	COLUMN B
		This Period	Calendar Year-to-Date
5. Covering Period	<u>1/15/88</u> through <u>8/4/88</u>		
6. a) Cash on Hand January 1, 19 <u>88</u>		\$ <u>0</u>	\$ <u>0</u>
b) Cash on Hand at Beginning of Reporting Period		\$ <u>0</u>	\$ <u>0</u>
c) Total Receipts (from Line 18)		\$ <u>5,345.00</u>	\$ <u>5,345.00</u>
d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)		\$ <u>5,345.00</u>	\$ <u>5,345.00</u>
7. Total Disbursements (from Line 28)		\$ <u>336.04</u>	\$ <u>336.04</u>
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))		\$ <u>5,008.96</u>	\$ <u>5,008.96</u>
9. Debts and Obligations Owed TO the Committee (itemize all on Schedule C and/or Schedule D)		\$ <u>0</u>	
10. Debts and Obligations Owed BY the Committee (itemize all on Schedule C and/or Schedule D)		\$ <u>0</u>	

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

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

Type or Print Name of Treasurer: JAMES T. EAGAN
 Signature of Treasurer: James T. Eagan
 Date: 9/1/88

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

FEC FORM 3X
revised 4-87

33105112975

DETAILED SUMMARY PAGE

of Receipts and Disbursements
(Page 2, FEG FORM 31)

Name of Committee (in full) WAC PAC - WIS. ACTION COALITION PAC	Report Covering the Period	
	From: 6/30/88	To: 8/24/88
I. RECEIPTS	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date
11 CONTRIBUTIONS (other than loans) FROM:		
(a) Individuals/Persons Other Than Political Committees		
(i) Itemized (use Schedule A)		
(ii) Unitemized	345.00	345.00
(iii) Total of contributions from individuals	345.00	345.00
(b) Political Party Committees		
(c) Other Political Committees (such as PACs)	5000.00	5000.00
(d) TOTAL CONTRIBUTIONS (add 11(i)(iii), (b), and (c))	5,345.00	5,345.00
12 TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES	0	0
13 ALL LOANS RECEIVED	0	0
14 LOAN REPAYMENTS RECEIVED	0	0
15 OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	0	0
16 REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	0	0
17 OTHER RECEIPTS (Dividends, Interest, etc.)	0	0
18 TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)	5,345.00	5,345.00
II. DISBURSEMENTS		
19 OPERATING EXPENDITURES	0	0
20 TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES	0	0
21 CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	0	0
22 INDEPENDENT EXPENDITURES (use Schedule E)	336.04	336.04
23 COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (use Schedule F)	0	0
24 LOAN REPAYMENTS MADE	0	0
25 LOANS MADE	0	0
26 REFUNDS OF CONTRIBUTIONS TO		
(a) Individuals/Persons Other Than Political Committees		
(b) Political Party Committees		
(c) Other Political Committees (such as PACs)		
(d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c))	0	0
27 OTHER DISBURSEMENTS	0	0
28 TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	336.04	336.04
III. NET CONTRIBUTIONS/OPERATING EXPENDITURES		
29 TOTAL CONTRIBUTIONS (other than loans) (from Line 11(d))	5,345.00	5,345.00
30 TOTAL CONTRIBUTION REFUNDS (from Line 26(d))	0	0
31 NET CONTRIBUTIONS (other than loans) (subtract Line 30 from 29)	5,345.00	5,345.00
32 TOTAL OPERATING EXPENDITURES (from Line 19)	336.04	336.04
33 OFFSETS TO OPERATING EXPENDITURES (from Line 15)	0	0
34 NET OPERATING EXPENDITURES (subtract Line 33 from 32)	336.04	336.04

SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedules for each category of the Detailed Summary Page

PAGE 1 OF 1
FOR LINE NUMBER 12

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

WISCONSIN ACTION COALITION P.A.C.

A Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
MACHINIST NON PARTISAN LEAGUE 1300 CONNECTICUT AVE WASHINGTON, DC 20036		7/28/88	\$5000.00
Receipt For <input type="checkbox"/> Other (specify) <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General	Occupation	Aggregate Year-to-Date > \$	\$5000.00
B Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For <input type="checkbox"/> Other (specify) <input type="checkbox"/> Primary <input type="checkbox"/> General	Occupation	Aggregate Year-to-Date > \$	
C Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For <input type="checkbox"/> Other (specify) <input type="checkbox"/> Primary <input type="checkbox"/> General	Occupation	Aggregate Year-to-Date > \$	
D Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For <input type="checkbox"/> Other (specify) <input type="checkbox"/> Primary <input type="checkbox"/> General	Occupation	Aggregate Year-to-Date > \$	
E Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For <input type="checkbox"/> Other (specify) <input type="checkbox"/> Primary <input type="checkbox"/> General	Occupation	Aggregate Year-to-Date > \$	
F Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For <input type="checkbox"/> Other (specify) <input type="checkbox"/> Primary <input type="checkbox"/> General	Occupation	Aggregate Year-to-Date > \$	
G Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For <input type="checkbox"/> Other (specify) <input type="checkbox"/> Primary <input type="checkbox"/> General	Occupation	Aggregate Year-to-Date > \$	

SUBTOTAL (if Receipts This Page optional)

TOTAL (if Receipts on last page this line number only)

5000.00

2305177

ITEMIZED INDEPENDENT EXPENDITURES

(See Reverse Side for Instructions)

Name of Committee (or Party)		ID No.		
WISCONSIN ACTION COALITION P.A.C.		030788		
Name, Mailing Address & ZIP Code of Each Party	Purpose of Expenditure	Date (month, day, year)	Amount	Name of Federal Candidate supported or opposed by the expenditure & office sought
WISCONSIN ACTION COALITION 152 W. WISCONSIN MILWAUKEE, WI 53208	CONTRACT FOR CONSULTATION BY TOM CONRAD 4 DAYS	7/28	267. ⁵⁴	S. ENGBLETT US SENATE <input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose
TOM CONRAD 5013 FARMHILL WATSON, WI 53714	TRAVEL EXPENSE REIMBURSEMENT	8/11	68. ⁵⁰	S. ENGBLETT US SENATE <input type="checkbox"/> Support <input checked="" type="checkbox"/> Oppose
				<input type="checkbox"/> Support <input type="checkbox"/> Oppose
				<input type="checkbox"/> Support <input type="checkbox"/> Oppose
				<input type="checkbox"/> Support <input type="checkbox"/> Oppose
				<input type="checkbox"/> Support <input type="checkbox"/> Oppose
a. SUBTOTAL of Itemized Independent Expenditures			\$336. ⁰⁴	
b. SUBTOTAL of Unitemized Independent Expenditures			\$	
c. TOTAL Independent Expenditures			\$	336. ⁰⁴

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

Signature: [Signature] Date: 8/2/58

Subscribed and sworn to before me this 21th day of August 1958

Notary Commission No. [Signature]

NOTARY PUBLIC

EXHIBIT 5

Herb Kohl Illegal Contributions to Alan Cranston

90040300116

SCHEDULE A
Line 11a

ITEMIZED RECEIPTS
CRANSTON FOR SENATE '86

Name & Address	Employer & Occupation	Date	Amount \$/G
McFadden, Howard M 16538 Ventura Blvd, Ste 500 Encino, CA 91436	Integrated Financial President	07/02/86	1000 G **
		Aggregate YTD =	1600
McLean, R 1000 Holman Phoenix, AZ 85076	Builders Plumbing Supply Executive	07/13/86	1000 G
		Aggregate YTD =	1000
McNeil, Allan D 4170 W Brown Deer Rd, #120 Milwaukee, WI 53223	Self-employed Real Estate	07/24/86	1000 G
		Aggregate YTD =	1000
McNeil, Barbara 1440 W Dean Rd Green Hills, WI 53217	Self-employed Artist	08/11/86	1000 G
		Aggregate YTD =	1000
McNeil, Dorothy 1072 North Lakeway Palm Beach, FL 33480	Self-employed Real Estate	07/28/86	1000 G
		Aggregate YTD =	1000
McNeil, Herbert M 225 N Jefferson St Milwaukee, WI 53202	Self-employed Real Estate	08/08/86	300 G
		Aggregate YTD =	300
McNikotronics, Matina R 2250 University Ave Sacramento, CA 95825	Law Student	09/04/86	250 G
		Aggregate YTD =	250
Meisberg, Franklin D 275 11340 San Vicente Blvd Los Angeles, CA 90049	Self Film Producer	07/22/86	500 G
		Aggregate YTD =	500
Meinwasser, Joe 145 S Fairfax Ave Los Angeles, CA 90036	K & F Commercial Properties Partner	07/17/86	500 G
		Aggregate YTD =	800
Merritt, Maurice M 1225 N Crescent Dr Beverly Hills, CA 90210	Kraines Enterprises, Inc. CEO	07/29/86	1000 G
		Aggregate YTD =	1100
Moran, Betty W 3111 Kelton Ave Los Angeles, CA 90034	Information Requested	08/13/86	320 G in kind
		Aggregate YTD =	320
Moran, Marion L 1342 S Sigma Dr Annona, CA 91756	Globe Plastics President	07/23/86	500 G
		Aggregate YTD =	1500

Page Total 8,970

** \$ 20 refunded 7/86

8702001.1731

SCHEDULE A
line 11a

ITEMIZED RECEIPTS
CRANSTON FOR SENATE '86

Name & Address	Employer & Occupation	Date	Amount P/G
Herr, Dolleen G 1175 Muirlands Dr La Jolla, CA 92037	Homemaker Aggregate YTD =	10/23/86 1000	1000 g
Herr, James R 1175 Muirlands Dr La Jolla, CA 92037	Avco Financial Executive Aggregate YTD =	10/23/86 1000	1000 g
Hessler, Irvin R 421 S LaSalle, Ste 1300 Chicago, IL 60605	Self-employed Market Maker Aggregate YTD =	10/20/86 1000	1000 g
Hadden, Randolph A 200 New Camb. Ave, N.W., #1504 Atlanta, GA 30307	Information Requested Aggregate YTD =	10/21/86 300	300 g
Helmman, Henry L Box 1725 St. Thomas, VI 00801	Charlotte Realty Corp Executive Aggregate YTD =	10/24/86 1000	1000 g
Hladshorn, Samuel C 1210 5th Ave New York, NY 10028	Information requested Aggregate YTD =	10/30/86 500	500 g
Hladshorn, Elizabeth B 1505 Rosellibo Lane Santa Barbara, CA 93106	CAF Arts Admin. Aggregate YTD =	10/20/86 400	400 g
Hieiner, Eugene 10.88 La Cresta Dr Los Altos Hills, CA 94022	Hieiner, Perkins et al Attorney Aggregate YTD =	10/31/86 1000	1000 g
Hieinman, Tula 1742 Sand Hill Rd. #305 Redwood City, CA 94064	Retired Aggregate YTD =	10/23/86 250	250 g
Krauer, Fred 2200 Sacramento St San Francisco, CA 94115	Krauer Computer Consulting Consultant Aggregate YTD =	10/17/86 500	500 g
Kraus, John F 126 The Embarcadero, 3rd Flr San Francisco, CA 94105	Nossaman et al Attorney Aggregate YTD =	10/27/86 750	500 g
Kraus, Lynn M 14348 Monte Mar Los Angeles, CA 90064	Self-employed CPA Aggregate YTD =	10/31/86 250	250 g
Kohn, Ansherbent 625 N Jefferson St Milwaukee, WI 53202	Information Requested Aggregate YTD =	11/03/86 1000	1000 g

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EXHIBIT 6

Mike Lowry Contributions from Council for Livable World

90040300119

Warning: Any information copied from this list may not be used by any person for the purpose of soliciting contributions, or for any commercial purposes.

Mike Lowry for US Senate Committee; Mary Lowry, Treasurer

NAME & ADDR	EMPLOYER & OCCUP	RECEIPTS FOR PERIOD 10/01/88 - 10/19/88	
		DATE	AMOUNT
OSCAR R HERNANDEZ 212 SUDBURY DR ATLANTIS, FL 33462 Rcvd for: General 1988	INFO REQUESTED VIA MAIL Aggr. to date: \$500.00	10/19/88	\$500.00
DOROTHY M HESTER 12014 PALATINE AVE N SEATTLE, WA 98133 Rcvd for: General 1988	Emp BOEING Occ TELEPHONE OPERATOR Aggr. to date: \$610.00	10/19/88 10/19/88 10/05/88	\$100.00 \$100.00 \$100.00
FRITZ HIRSCHMANN 6427 SANDPOINT WAY NE SEATTLE, WA 98115 Rcvd for: General 1988	Occ RETIRED Aggr. to date: \$225.00	10/06/88	\$100.00
JOHN HODEL 4710 SOUTHWEST DR FRIDAY HARBOR, WA 98250 Rcvd for: General 1988	Retired Aggr. to date: \$300.00	10/17/88	\$250.00
GERALD F HORNOF 11921 LAWLER ST LOS ANGELES, CA 90066 Rcvd for: General 1988	Emp DOC/NOAA/NMFS Occ SYST. ANALYST Aggr. to date: \$250.00	10/13/88	\$50.00
EDWARD W HOYT 54 GREYTER RD ROSLINDALE, MA 02131 Rcvd for: General 1988	Emp UNIV. OF MASS. Occ TEACHER Con COUNCIL FOR LIVABLE WORLD Aggr. to date: \$1,000.00	10/19/88	\$1,000.00
MARION M HUNT 27 SEA COLONY DR SANTA MONICA, CA 90405 Rcvd for: General 1988	INFO REQUESTED VIA MAIL Aggr. to date: \$1,000.00	10/07/88	\$1,000.00

**PAGE SUBTOTAL: \$3,200.00

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10/26/88

MODULE A - FOR ITEMIZED RECEIPTS

PAGE 18 OF 40
FOR LINE NO. 11A

Warning: Any information copied from this list may not be used by any person for the purpose of soliciting contributions, or for any commercial purposes.

Mike Lowry for US Senate Committee; Mary Lowry, Treasurer

NAME & ADDR		EMPLOYER & OCCUP	RECEIPTS FOR PERIOD 10/01/88 - 10/19/88	
			DATE	AMOUNT
JOHN R HUNTING 2130 P ST NW WASHINGTON, DC 20037 Rcvd for: General 1988		Emp ASSET INVESTMENT MGMT. Aggr. to date: \$1,025.00	10/07/88	\$1,000.00
JANE H. HUNTINGTON 1514 NE RAVENNA BLVD SEATTLE, WA 98105 Rcvd for: General 1988		INFO REQUESTED VIA MAIL Aggr. to date: \$225.00	10/13/88	\$75.00
KIICHIRO INOUYE 4123 13TH AVE S SEATTLE, WA 98108 Rcvd for: General 1988		Emp BOEING Occ ENGINEER Aggr. to date: \$250.00	10/18/88	\$50.00
NANCY S INUI 6206 WILSON AVE SEATTLE, WA 98118 Rcvd for: General 1988		Emp UNIV. OF WASH. Occ ENGINEER Aggr. to date: \$450.00	10/06/88	\$250.00
KEITH IOSSO 125 NE 63RD STREET SEATTLE, WA 98115 Rcvd for: General 1988		Emp ARI Occ SOFTWARE ENGINEER Aggr. to date: \$250.00	10/06/88	\$200.00
CHRISTOPHER JENCKS 1710 ASBURY AVE EVANSTON, IL 60201 Rcvd for: General 1988		Emp NORTHWESTERN UNIV. Occ SOCIOLOGY PROF. Con COUNCIL FOR LIVABLE WORLD Aggr. to date: \$500.00	10/19/88	\$500.00
ANNE B JOHNSTON 822 31ST SEATTLE, WA 98122 Rcvd for: General 1988		Occ RETIRED Aggr. to date: \$750.00	10/12/88	\$500.00
			**PAGE SUBTOTAL:	\$2,575.00

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10/26/88

SCHEDULE A - FOR ITEMIZED RECEIPTS

PAGE 19 OF 40
FOR LINE NO. 11A

Warning: Any information copied from this list may not be used by any person for the purpose of soliciting contributions, or for any commercial purposes.

Mike Lowry for US Senate Committee; Mary Lowry, Treasurer

NAME & ADDR	EMPLOYER & OCCUP	RECEIPTS FOR PERIOD 10/01/88 - 10/19/88	
		DATE	AMOUNT
PATRICIA JOLIN 6826 - 36TH NW SEATTLE, WA 98117 Rcvd for: General 1988	Occ STUDENT Aggr. to date: \$300.00	10/17/88	\$100.00
SARA D KAPLAN 3873 80TH AVE S E MERCER ISLAND WA 98040 Rcvd for: General 1988	Occ RETIRED TEACHER Aggr. to date: \$310.00	10/19/88	\$100.00
LYDIA S KARHU RCR 77 2 10 101 001 COSMOPOLIS, WA 98537 Rcvd for: General 1988	Occ RETIRED Aggr. to date: \$205.00	10/07/88	\$100.00
HELENA KARINEN 2705 NE 6TH PL RENTON, WA 98056 Rcvd for: General 1988	Occ RETIRED Aggr. to date: \$225.00	10/12/88	\$225.00
THOMAS PATRICK KEEFE, JR P.O. BOX 4447 SEATTLE, WA 98104 Rcvd for: General 1988	Occ ATTORNEY AT LAW Aggr. to date: \$1,120.00	10/07/88	\$1,000.00
KARL W KENYON 11990 LAKESIDE PL NE SEATTLE, WA 98125 Rcvd for: General 1988	Occ RETIRED Con COUNCIL FOR LIVABLE WORLD Aggr. to date: \$230.00	10/19/88 10/18/88 10/15/88	\$25.00 \$50.00 \$25.00
NEAL A. KOMEDAL 2615 S DE LAPPE PL SEATTLE, WA 98144 Rcvd for: General 1988	Emp SEATTLE CITY LIGHT Occ ASSISTANT GARDENER Aggr. to date: \$260.00	10/19/88 10/06/88	\$50.00 \$20.00

**PAGE SUBTOTAL: \$1,490.00

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10/26/88

SCHEDULE A - FOR ITEMIZED RECEIPTS

PAGE 23 OF 40
FOR LINE NO. 11A

Warning: Any information copied from this list may not be used by any person for the purpose of soliciting contributions, or for any commercial purposes.

Mike Lowry for US Senate Committee; Mary Lowry, Treasurer

NAME & ADDR	EMPLOYER & OCCUP	RECEIPTS FOR PERIOD 10/01/88 - 10/19/88	
		DATE	AMOUNT
MANTON FOR CONGRESS GERARD SWEENEY 6221 29TH ST, NW WASHINGTON, DC 20015 Rcvd for: General 1988	Aggr. to date: \$500.00	10/08/88	\$500.00
PAUL H MARCH 4402 S 166TH SEATTLE, WA 98188 Rcvd for: General 1988	Occ RETIRED Aggr. to date: \$400.00	10/18/88	\$200.00
EDGAR K. MARCUSE, M.D. 2153 E SHELBY SEATTLE, WA 98112 Rcvd for: General 1988	Emp CHILDREN'S HOSPITAL Occ PHYSICIAN Aggr. to date: \$250.00	10/07/88	\$50.00
BOB MARKHOLT 4851 S RAYMOND SEATTLE, WA 98118 Rcvd for: General 1988	Emp THE MEAT SHOP Occ MEAT CUTTER Aggr. to date: \$275.00	10/07/88	\$25.00
GUY R MARTIN 1124 EAST CAPITAL ST NE WASHINGTON DC, WA 20002 Rcvd for: General 1988	Emp PERKINS COIE Occ LAWYER Aggr. to date: \$250.00	10/05/88	\$250.00
GEORGE MARTIN 7823 PARK AVE ELKINS PARK, PA 19117 Rcvd for: General 1988	Emp SELF Occ LAWYER Con COUNCIL FOR LIVABLE WORLD Aggr. to date: \$250.00	10/19/88	\$250.00
MARTIN OLAV SABO FOR CONGRESS-VOLUNTEERS 4832 ELLIOT AVE S MINNEAPOLIS, MN 55417 Rcvd for: General 1988	Aggr. to date: \$1,000.00	10/08/88	\$1,000.00

**PAGE SUBTOTAL: \$2,275.00

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Mike Lowry for US Senate Committee; Mary Lowry, Treasurer

NAME & ADDR	EMPLOYER & OCCUP	RECEIPTS FOR PERIOD 10/01/88 - 10/19/88	
		DATE	AMOUNT
HUGH MIRACLE PO BOX 31235 WALLINGFORD ST. SEATTLE, WA 98103 Rcvd for: General 1988	Occ RETIRED LAWYER	10/06/88	\$100.00
	Aggr. to date: \$575.00		
TOMIO MORIGUCHI 903 E LYNN SEATTLE, WA 98102 Rcvd for: General 1988	Emp UWAJIMAYA CO. Occ PRESIDENT	10/06/88	\$250.00
	Aggr. to date: \$600.00		
DOROTHY MORRELL 2460 WESTLAKE AVE N #E SEATTLE, WA 98109 Rcvd for: General 1988	Emp SELF Occ INVESTOR Con COUNCIL FOR LIVABLE WORLD	10/18/88 10/15/88	\$250.00 \$250.00
	Aggr. to date: \$900.00		
1133 FIFTH AVENUE NEW YORK, NY 10128 Rcvd for: General 1988	Occ SELF EMPLOYED		
	Aggr. to date: \$1,000.00		
SABURO NAKAGAWA 4122 - 24TH PL S SEATTLE, WA 98108 Rcvd for: General 1988	Occ RETIRED	10/05/88	\$50.00
	Aggr. to date: \$240.00		
TERRY T NAKANO 1825 S JACKSON ST SUITE 100 SEATTLE WA 98144 Rcvd for: General 1988	Emp SELF Occ RESTAURANTEUR	10/12/88	\$200.00
	Aggr. to date: \$300.00		
DALE D. NESBITT 1712 MARIN AVE BERKELEY, CA 94707 Rcvd for: General 1988	Emp UNIV OF CALIF (LBL) Occ ENGINEER	10/18/88	\$250.00
	Aggr. to date: \$250.00		
		**PAGE SUBTOTAL:	\$2,350.00

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10/26/88

SCHEDULE A - FOR ITEMIZED RECEIPTS

PAGE 26 OF 40
FOR LINE NO. 11A

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Mike Lowry for US Senate Committee; Mary Lowry, Treasurer

NAME & ADDR EMPLOYER & OCCUP RECEIPTS FOR PERIOD
10/01/88 - 10/19/88

		DATE	AMOUNT
LEWIS W NOLLETTE 9600 NE 113TH AVE VANCOUVER, WA 98662 Rcvd for: General 1988	Occ RETIRED Aggr. to date: \$250.00	10/06/88	\$250.00

RICHARD D NORLING 1217 E STREET, SE WASHINGTON, DC 20003 Rcvd for: General 1988	Emp LANGUAGE SYSTEMS CORP. Occ SOFTWARE DEVELOPER Aggr. to date: \$1,400.00	10/07/88	\$1,000.00
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CHIZUKO T NORTON 4115 51ST AVE NE SEATTLE, WA 98105 Rcvd for: General 1988	Occ SOCIAL WORKER Aggr. to date: \$215.00	10/19/88	\$50.00
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CAROLINE A. NUSSBAUM 7531 DIBBLE AVE. NW SEATTLE, WA 98117 Rcvd for: General 1988	Emp LAKE WASH. SCH. DIST. Occ TEACHER Aggr. to date: \$250.00	10/05/88	\$50.00
--	---	----------	---------

ELWYN H. ODELL 2569 24TH AVE. W SEATTLE, WA 98199 Rcvd for: General 1988	Occ RETIRED PROFESSOR Aggr. to date: \$205.00	10/06/88	\$15.00
---	--	----------	---------

F.X. OLANIE 1018 SUMMIT AVE E SEATTLE, WA 98102 Rcvd for: General 1988	Emp SELF Occ CONSULTANT Aggr. to date: \$1,000.00	10/05/88	\$500.00
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ROBERT D. OLMSTEAD 3862 MAY CT. PALO ALTO, CA 94303 Rcvd for: General 1988	Emp SPECIALTY CAMPS WEST Occ EXECUTIVE Con COUNCIL FOR LIVABLE WORLD Aggr. to date: \$1,000.00	10/18/88	\$1,000.00
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**PAGE SUBTOTAL: \$2,865.00

239A03024754

plan



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 4, 1988

SPECIAL DELIVERY

Mr. Jann L. Disten
Executive Director
National Republican Senatorial
Committee
440 First Street, NW
Suite 600
Washington, DC 20001

RE: MUR 2764

Dear Mr. Disten:

This letter acknowledges receipt on November 3, 1988, of your complaint against Herb Kohl For United States Senate, Inc. and Herb Kohl For Senate, as treasurer, Herb Kohl, and the Wisconsin Action Coalition For Sen James Jeffrey Egan, as treasurer, alleging violations of the Federal Election Campaign Law. A staff member has been assigned to analyze your allegations. The respondents will be notified of this complaint within 24 hours. You will be notified as soon as the Commission takes final action on your complaint. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Please be advised that this matter shall remain confidential in accordance with 2 U.S.C. Sections 4371(a)(5) and 4371(b)(2) unless the respondents notify the Commission in writing that they wish the matter to be made public.

Sincerely,

Lawrence M. Noble
General Counsel

By: Lois E. Lerner
Associate General Counsel

Enclosure
Procedures

90040300126



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 4, 1988

SPECIAL DELIVERY

Linda de la Mora, Treasurer
Herb Kohl For United States
Senate, Inc.
625 N. Jefferson
Milwaukee, WI 53202 =

RE: MUR 2764
Herb Kohl For United
States Senate, Inc.
and Linda de la Mora,
as treasurer

Dear Ms. Mora:

This letter is to notify you that on November 3, 1988, the Federal Election Commission received a complaint which alleges that you and Herb Kohl For United States Senate, Inc. and you, as Treasurer, Inc. have violated certain sections of the Federal Election Campaign Act of 1971, as amended (the Act). A copy of the complaint is enclosed. We have numbered this matter MUR 2764. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no violation of the Act has taken place against you and Herb Kohl For United States Senate, Inc. in this matter. Please submit any evidence or legal materials that you believe are relevant to the Commission's determination of this matter. Where appropriate, state the reasons why you believe no violation of the Act has occurred. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. You are encouraged to respond to this notification promptly. In order to facilitate an expeditious response, we have enclosed a pre-addressed, postage paid, special delivery envelope. If no response is received within 15 days, the Commission may take further action based on the available information.

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

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

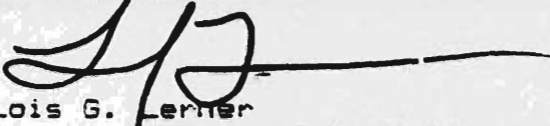
90040300127

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

If you have any questions, please contact Robert Raich at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel


By: Lois G. Lerner
Associate General Counsel

Enclosures
Complaint
Procedures
Envelope
Form

90040360128



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 4, 1988

SPECIAL DELIVERY

Mr. Herb Kohl
825 N. Jefferson
Milwaukee, WI 53202

RE: MUR 2764
Herb Kohl

Dear Mr. Kohl:

This letter is to notify you that on November 3, 1988, the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2764. Please refer to this number in all future correspondence.

In order for you to have the opportunity to demonstrate in writing that no action should be taken against you in this matter, please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your responses, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. You are encouraged to respond to this notification promptly. In order to facilitate an expeditious response, we will accept a check for postage paid, special delivery mail. If no response is received within 15 days, the Commission will take further action based on the available information.

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

This matter will remain confidential in accordance with Section 552(a)(4)(B) and Section 552g(a)(12)(G) of Title 5 unless you notify the Commission in writing that you wish the matter to be made public.

90040300129

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

If you have any questions, please contact Robert Raich at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

By: 
Lois G. Lerner
Associate General Counsel

Enclosures
Complaint
Procedures
Envelope
Form

90040360130



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 4, 1988

SPECIAL DELIVERY

James Jeffrey Eagan, Treasurer
Wisconsin Action Coalition PAC
- WACPAC
610 N. Water Street
Milwaukee, WI 53202

RE: MUR 2764
Wisconsin Action Coalition
PAC - WACPAC and James
Jeffrey Eagan, as
treasurer

Dear Mr. Eagan:

This letter is to notify you that on November 3, 1988, the Federal Election Commission received a complaint which alleges that the Wisconsin Action Coalition PAC - WACPAC and you, as treasurer, may have violated certain sections of the Federal Election Campaign Act of 1971, as amended, and the Federal Election Commission's regulations thereunder. We are concerned with this matter and please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no violation of the Act occurred and that you and the Wisconsin Action Coalition PAC are innocent of the matter. Please submit your response to the Commission as soon as possible. Your response, which should be accompanied by the necessary evidence, must be received by the Commission within 15 days of the date of this letter. You are encouraged to respond to this notification promptly. In order to facilitate an expeditious response, we have enclosed a pre-addressed, postage paid, special delivery envelope. If no response is received within 15 days, the Commission may take further action based on the available information.

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

This matter will remain confidential in accordance with Section 437g(a)(4)(B) and Section 437g(a)(1)(A) of Title 2 unless you notify the Commission in writing that you wish the matter to be made public.

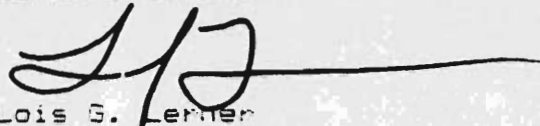
90040300131

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

If you have any questions, please contact Robert Raich at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel


By: Lois G. Lerner
Associate General Counsel

Enclosures
Complaint
Procedures
Envelope
Form

91040300132.

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIA

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

88 NOV -7 PH 1:05

EXPEDITED FIRST GENERAL COUNSEL'S REPORT

SENSITIVE

MUR: 2764

STAFF MEMBER: R. Raich

COMPLAINANT: Jann L. Olsten, Executive Director, National
Republican Senatorial Committee

RESPONDENTS: Herb Kohl for United States Senate, Inc. and Linda
de la Mora, as treasurer
Herb Kohl
Wisconsin Action Coalition PAC - WACPAC and
James Jeffrey Eagan, as treasurer

SUMMARY OF ALLEGATIONS

The complaint alleges three separate sets of violations:
1) that Herb Kohl for United States Senate, Inc. (the
"Committee") failed to report that it was the recipient of
earmarked contributions that passed through a conduit, namely
Council for a Livable World; 2) that independent expenditures by
Wisconsin Action Coalition PAC - WACPAC may have been conducted
in coordination with the Committee; and 3) that Herb Kohl made
improper contributions to Cranston for Senate '86.

PRELIMINARY LEGAL ANALYSIS

A. Earmarked Contributions

The intended recipient of an earmarked contribution shall
disclose on his next report each conduit through which the
contribution passed. 11 C.F.R. § 110.6(c)(3).

The complaint alleges the Committee failed to report that
earmarked contributions it received through Council for a Livable
World had in fact passed through that conduit.

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B. Independent Expenditures

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The term "independent expenditure" means an express advocacy expenditure not made in concert with, at the request or suggestion of, or in cooperation or consultation with any authorized committee or agent of a candidate. 2 U.S.C. § 431(17). Every person who makes independent expenditures aggregating in excess of \$250 per year must report that activity. 2 U.S.C. § 434(c). Any political committee not authorized by a candidate must report the name and address of each political committee that has received a contribution from the reporting committee, together with the date and amount of the contribution. 2 U.S.C. §§ 434(b)(6)(B)(i) and 434(b)(4)(H)(i). Each political committee must report the total amount of all receipts, the total amount of all contributions from other political committees, and the identification of each political committee that makes a contribution to the reporting committee, together with the date and amount of such contribution. 2 U.S.C. §§ 434(b)(2)(D) and 434(b)(3)(B).

The complaint suggests there may have been coordination between the Committee and WACPAC concerning \$336.04 of disbursements WACPAC reported as independent expenditures opposing Herb Kohl's opponent. The basis for that allegation in the complaint is that "Kohl assistant campaign manager

Christofferson has benefitted from WAC contributions in the past through his work for other WAC-supported candidates." If there were coordination, the disbursements in question would not have been independent expenditures, but rather would have been in-kind contributions, requiring disclosure as such by both WACPAC and the Committee.

C. Improper Contributions

No person may make contributions aggregating in excess of \$1,000 per election to any authorized political committee.

2 U.S.C. § 441a(a)(1)(A). No person shall make a contribution in the name of another person. 2 U.S.C. § 441f.


The complaint alleges that Herb Kohl contributed \$900 to Cranston for Senate '86 in his own name on August 8, 1986, for the 1986 general election, and that Mr. Kohl also contributed \$1,000 to Cranston for Senate '86 in the name of Mrs. Herbert Kohl on November 3, 1986, for the same election. The complaint states that Mr. Kohl is not married.

D. Conclusion

The complaint raises a number of factual issues. Accordingly, the respondents will have an opportunity to reply before this Office makes recommendations in this matter.

Lawrence M. Noble
General Counsel

90040300135
Date 11/2/88

BY: 
Lois G. Lerner
Associate General Counsel



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL & ETHICS OFFICER

FROM: SCOTT E. THOMAS *ST*
COMMISSIONER

SUBJECT: RECUSAL IN MUR 2764

DATE: NOVEMBER 8, 1988

I have recused myself from any consideration or action in connection with MUR 2764, Wisconsin Action Coalition PAC.

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06CH1069

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

MANATT, PHELPS, ROTHENBERG & EVANS
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
ATTORNEYS AT LAW

88 NOV 16 AM 9:27

1200 NEW HAMPSHIRE AVENUE, N.W.
SUITE 200
WASHINGTON, D.C. 20006
TELEPHONE (802) 463-4300

LOS ANGELES
11386 WEST OLYMPIC BOULEVARD
LOS ANGELES, CALIFORNIA 90084
(818) 318-4000

November 15, 1988

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

Re: MUR 2764

88 NOV 16 AM 11:58

Dear Mr. Raich:

This letter is in reference to the above referenced complaint. The complaint was received by Jeffrey Eagan of Wisconsin Action Coalition PAC ("WAC PAC") on November 8, 1988, and their response would be due on November 23, 1988. Due to the scheduling of depositions in another matter, I will be unable to begin preparation of a response on behalf of WAC PAC until December. For this reason, I request a twenty day extension of time until December 13, 1988, in which to respond to the complaint.

If you have any questions, please contact me at 463-4320.
Thank you.

Sincerely,

Lyn Utrecht Oliphant
Lyn Utrecht Oliphant
Manatt, Phelps, Rothenberg
& Evans

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STATEMENT OF DESIGNATION OF COUNSEL

0041158

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

MUR 2764

88 NOV 23 AM 9:46

NAME OF COUNSEL: LYNN OLIPHANT

ADDRESS: MANATT PHELPS
SUITE 200

1200 NEW HAMPSHIRE, NW
WASHINGTON, DC 20036

TELEPHONE:

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.

11/15/88
Date

James J. Eagan
Signature

89 NOV 23 PM 1:45

RESPONDENT'S NAME:

JAMES J. EAGAN
WISCONSIN ACTION COALITION PAC

ADDRESS:

SUITE 633
152 W WISCONSIN AVE
MILWAUKEE, WI 53203

HOME PHONE:

(414) 961-2184

BUSINESS PHONE:

(414) 272-2562

20040360138

RECEIVED
FEDERAL ELECTION COMMISSION

411 East Wisconsin Avenue
Milwaukee, Wisconsin 53202
414/277-6000
Telecopier 414/271-3552

FEDERAL ELECTION COMMISSION
West Palm Beach and Naples, Florida
Phoenix, Arizona
88 NOV 28 AM 11:24

UCC #1195

Quarles & Brady

November 23, 1988

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

Attention: Mr. Robert Raich

Re: **MUR2764**
Herb Kohl and Herb Kohl for United States Senate, Inc

88 NOV 29 AM 11:20

Dear Mr. Raich:

Enclosed you will find the original and two copies of the response of Herb Kohl and Herb Kohl for United States Senate, Inc. to the complaint in the above-referenced matter. The response includes an Exhibit 1, an Affidavit of William Christofferson, and exhibits and attachments to Mr. Christofferson's affidavit. Also enclosed is a statement of designation of counsel executed by Herb Kohl and Herb Kohl for United States Senate, Inc.

Please advise us if there is any other material that is required to be filed as part of a response to the complaint. Thank you very much for your consideration.

Very truly yours,

QUARLES & BRADY

Samuel Recht
Samuel J. Recht

SJR/mjs
enclosures

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STATEMENT OF DESIGNATION OF COUNSEL

RECEIVED
DESIGNATION COMMISSION
TRAIN ROOM

88 NOV 28 AM 11:24

MUR 2764

NAME OF COUNSEL: Samuel J. Recht

ADDRESS: Quarles & Brady

411 East Wisconsin Avenue

Milwaukee WI 53202

TELEPHONE: 414-277-5000

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.

November 23, 1988
Date


Signature Herbert Kohl

RESPONDENT'S NAME: Herbert Kohl

ADDRESS: 825 North Jefferson Street

Milwaukee WI 53202

HOME PHONE: 414-273-3161

BUSINESS PHONE: 414-271-6600

90040300140

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2764

NAME OF COUNSEL: Samuel J. Recht

ADDRESS: Quarles & Brady

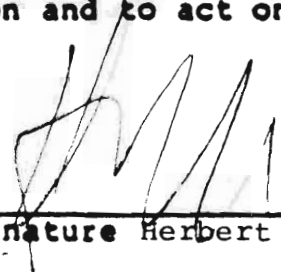
411 East Wisconsin Avenue

Milwaukee WI 53202

TELEPHONE: 414-277-5000

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.

November 23, 1988
Date


Signature Herbert Kohl, President

RESPONDENT'S NAME: Herb Kohl for United States Senate, Inc.

ADDRESS: 825 North Jefferson Street

Milwaukee WI 53202

HOME PHONE: _____

BUSINESS PHONE: 414-276-5645; 414-271-6600

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printing and other costs relating to securing the individual contributions in question were paid for by the Kohl campaign. Based on these facts and discussions, Mr. Christofferson made a good faith determination that the individual contributions in question were not "earmarked contributions." Rather, they were to be reported and were reported as individual contributions on the Kohl campaign reports filed with the Federal Election Commission. Mr. Christofferson's understanding was that individual contributor checks transmitted and received in response to a solicitation, the costs of which were paid by the candidate specifically named in the check, did not come within the definition of "earmarked contributions" in the applicable regulations.

Regulation section 110.6 references 2 U.S.C. section 441(a)(7)(A) as authority for requiring reports of "Earmarked contributions." While the regulation defines "earmarked," it does not specifically state that checks made payable by an individual contributor to a specific named payee candidate are "earmarked." The regulation does not define "conduit" or "intermediary." The only reference in the regulation to the individual contributor's check appears in section 110.6(c)(1)(ii) and this reference is arguably applicable only to an individual contributor's check made payable to the "conduit" and passed on by the conduit's endorsement of the check.

The only Kohl campaign FEC report that is relevant in this matter was the report prepared as of October 19, 1988 and filed

with the Federal Election Commission on October 27, 1988. As of the time of the report filed by the Kohl campaign, the relevant contributions totaled \$7,248.00. (See pages 3 - 8 of Exhibit 1 to complaint.) The balance of the contributions referred to in the complaint, some \$14,000, were not received by the Kohl campaign until after October 21, 1988, were not required to be included in the report filed on October 27, 1988 and will be included in the Kohl campaign report due to be filed on December 8, 1988.

The basic tenet of the federal election law being disclosure (see page 2 of complaint), it is of primary importance that the matters complained of had received widespread publicity in the State of Wisconsin beginning October 20, 1988, well before the November 8, 1988 general election, and before the time when the Kohl campaign report for the period involved was filed with the Federal Election Commission on October 27, 1988. Exhibit 7 referred to in the complaint herein is an example of the widespread media attention and the consequent pervasive public awareness of the contributions involved in this matter. Similar articles appeared in many other Wisconsin newspapers. (See attachment to Christofferson affidavit which reflect many but far from all of the newspaper articles on the subject.) The public was fully aware that the individual contributions were transmitted by the Council for a Livable World. There was not and there could not be a "cover-up" of the facts. There was no intent or reason to "cover-up" the facts. It was in this setting of widespread and thorough

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media coverage that the filing of the Kohl campaign FEC report on October 27, 1988, was seized upon by the National Republican Senatorial Committee as an opportunity to again generate and secure widespread publicity of these known facts. The making and release of the complaint in this matter on October 31, 1988 of course made headline news in Wisconsin. (See Exhibit 1, attached hereto.)

Even if one were to assume that the National Republican Senatorial Committee's interpretation of the applicable regulations was correct and required the Kohl campaign FEC report filed on October 27, 1988 to include a notation that the individual contributions involved in this matter were transmitted by the Council for a Livable World, the public disclosure that the notation would have generated would have merely repeated widespread publicity referred to.

If it is the Federal Election Commission's position that the good faith determination made by the Kohl campaign with respect to the reporting of the individual contributions involved in this matter was incorrect, the Kohl campaign will file an amended report with respect to the relevant time period involved. In view of the filing of the complaint herein the Kohl campaign intends to note in its next report which is due to be filed on December 8, 1988, that the individual contributions were transmitted by the Council for a Livable World, although the Kohl campaign continues to maintain the position that the applicable regulations do not require such a notation and that

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such a notation is made without prejudice to the position set forth in this matter.

The complaint filed in this matter goes on to ask the Federal Election Commission to investigate two other matters. The first relates to certain independent expenditures undertaken by the Wisconsin Action Coalition with respect to Susan Engeleiter. The affidavit of Mr. Christofferson makes clear there was no coordination between the Kohl campaign, Herbert Kohl, any authorized committee for Kohl nor anyone who was an agent for or otherwise associated with the Kohl campaign and Wisconsin Action Coalition with respect to any independent expenditures undertaken by the Wisconsin Action Coalition relating to Susan Engeleiter and that neither Mr. Christofferson nor any other person associated with the Kohl campaign cooperated with, consulted with, acted in consort with, requested or suggested that any expenditures be made by Wisconsin Action Coalition with respect to Susan Engeleiter.

The second matter relates to campaign contributions made by Mr. Kohl to the Cranston for Senate campaign in 1986. The checks representing those contributions are attached to the Christofferson affidavit. They disclose that on August 8, 1986, Herbert H. Kohl drew a check payable to Cranston for Senator for the amount of \$900, and, on October 24, 1986, Herbert H. Kohl drew a check payable to Cranston for Senate in the amount of \$1,000. Neither of the checks refer to, imply, or in any other manner indicate that the contributor was anyone other than Herbert H. Kohl. They in no way indicate or imply that the

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contributor was a Mrs. Herbert Kohl. Since the federal election law imposes reporting requirements, not on contributors, but, on the recipients of the contributions the erroneous manner in which the Cranston campaign report reported the Kohl contributions is not referable to Mr. Kohl. In fact, Mr. Kohl's contributions to the Cranston campaign were fully within the contribution limitations for primary and general election contributions to the candidate.

A final word is appropriate with respect to the manner in which, in this matter, the National Republican Senatorial Committee has used the procedures established by the Federal Election Campaign Act for partisan political purposes. Both the Act and the applicable regulations mandate confidentiality with respect to complaints filed with the FEC. 2 U.S.C. 437(g)(a)(12); 11 C.F.R. 111.21. Rather than respect this mandate, the National Republican Senatorial Committee chose to make a public press release of its complaint before filing it with the Commission. (See Exhibit 1, Milwaukee Journal November 1, 1988). Both the rhetoric of the complaint and the manner in which it was publicized in the eleventh hour of the campaign raise serious questions which should concern the Commission. Persons should not be encouraged to utilize procedures established under the federal election laws in a manner which is inconsistent with the intent and purpose of such laws.

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Herb Kohl for United States Senate, Inc. and Herb Kohl
respectfully request that the complaint of the National
Republican Senatorial Committee be dismissed.

Dated this 23rd day of November, 1988.

Respectfully submitted,

Samuel J. Recht
Samuel J. Recht
Quarles & Brady
411 East Wisconsin Avenue
Milwaukee WI 53202
414-277-5000

Attorneys for Herb Kohl for
United States Senate, Inc.,
and Herb Kohl

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Exhibit 1

312

GOP group says Kohl violated election laws

The National Republican Senatorial Committee, which is giving more than \$300,000 to Susan Engeleter's Senate campaign, has charged her opponent, Herb Kohl, with improper election practices.

With a week to go in the race, the partisan committee from Washington, D.C., has prepared a federal elections complaint against the Milwaukee Democrat. It released the complaint to reporters Monday, though as of Tuesday morning it had not yet filed it with the Federal Elections Commission.

Its main charge is that Kohl didn't properly report several thousand dollars in contributions raised through an anti-nuclear political action committee.

Kohl's campaign listed the contributions in its Oct. 1-19 campaign report, but it didn't identify them as having come through the anti-nuclear PAC, the Council for a Livable World. Kohl has said he won't take any money from PACs or special interests.

Kohl's spokesman, Bill Christofferson, labeled the complaint "the usual last-minute kind of baseless charges people make. They do it to make a headline. They know they get thrown out after the election."

Under the FEC's procedures, there is little chance the complaint would be resolved before next Tuesday's election.

The anti-nuclear contributions were first publicized last month, prompting Engeleter to accuse Kohl of hypocrisy on the PAC issue. Christofferson has denied the contributions constitute PAC money, because the checks in question were written to the Kohl campaign from individuals, not from the PAC. Those individuals, however, were solicited by the PAC, which collected the checks and passed them on to Kohl.

According to Fred Eiland, a

spokesman for the Federal Elections Commission, contributions that pass through an intermediary may be listed as individual contributions. But the candidate who receives them also must show in his or her reports that they came through an intermediary.

The complaint also suggests that the Kohl campaign is coordinating its campaign efforts with the Wisconsin Action Coalition, a non-profit group that is supposed to be acting independently of candidates' campaigns. The committee, which exists to get Republican senators elected, offered no direct evidence of that.

In the past two years, the coalition has been the target of several complaints by Republicans who charge it has been operating improperly as a political entity. The group is an umbrella organization of church, labor, community and senior citizen groups that espouse a progressive brand of politics.

The final charge in its complaint is that in 1986 Kohl personally made an illegal contribution to Sen. Alan Cranston (D-Calif.). According to the complaint, Kohl made contributions of \$900 and \$1,000 to Cranston during his general election campaign. An individual can give only \$1,000 per general election campaign to a congressional candidate.

The complaint also charged that one of the contributions was credited in Cranston's finance reports to a "Mrs. Herbert Kohl." A check of election records confirmed the complaint. Kohl is not married.

Kohl listed both contributions as his own in a list of his past political contributions that he released to reporters this summer. Christofferson said Kohl had never written a check from "Mrs. Herbert Kohl" and had no explanation for the way the check was credited. He also said it was the responsibility of Cranston's campaign to return any excess contributions.

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702 Midvale Blvd.
Madison, Wis. 53705

Chicago Bureau Division

Milwaukee Sentinel

1988

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GOP panel claims Kohl made improper donation

By **NICK ROMELL**
Sentinel staff writer

Democratic US Senate candidate Herbert Kohl made an improper campaign contribution in 1986 and has failed to properly identify more than \$20,000 he received through a political action committee, the National Republican Senatorial Committee alleged Monday.

The committee filed a complaint with the Federal Election Commission, asking it to investigate the charges.

Kohl faces Republican Susan Engleleiter in the Nov. 8 election. It is

unlikely the FEC could investigate and issue a decision by then.

That prompted Kohl's deputy campaign manager, William Christofferson, to charge that the complaint deliberately was filed "at the last minute, when they know that there's no way the complaint will be resolved, or any decision will be reached, before the election."

Christofferson also disputed the substance of the allegations.

The Republican committee alleged Kohl made two general election contributions, totaling \$1,900, to the 1986 campaign of Sen. Alan Cranston

(D-Calif.)

Cranston's campaign finance reports listed the second of the contributions as coming from Mrs. Herbert Kohl, the Republicans alleged. Kohl is unmarried.

Individuals may give a candidate no more than \$1,000 per election. Primary and general elections are counted separately.

The first of Kohl's checks, according to the complaint, was dated two months after the 1986 California primary.

Kohl did make two contributions to Cranston in 1986 totaling \$1,900,

Christofferson said.

He said one check may have been designated for primary campaign expenses, even though it was written after the primary.

The responsibility to keep track of and return any excess contributions rests with the campaign committee, not the donor, Christofferson said.

He said Kohl had never written any check for "Mrs. Kohl."

The Republican committee also alleged Kohl received \$20,357 in "bundled contributions" from the Council for a Livable World, an anti-nuclear organization registered as a PAC.

"Bundled contributions" are individual donations grouped together and channeled through a PAC. Candidates must report on bundled contributions as such.

The Republicans charged that Kohl failed to do that.

Christofferson said the contributions were individual donations.

"We got advice on how to report those," he said. "Our understanding is that we have complied with the law."

Other Senate candidates have received similar contributions and reported them the same way Kohl did, Christofferson said.

702 Midvale Blvd.
Madison, Wis. 53705
Clipping Bureau Division
Madison, The Capital Times

312 GOP's late complaint draws Kohl aide's ire

MILWAUKEE (AP) — An aide to U.S. Senate candidate Herbert Kohl charged that a Republican committee waited until the last minute to file a complaint against Kohl so that the issue could not be settled before the election.

The National Republican Senatorial Committee filed the complaint Monday with the Federal Election Commission.

The complaint asked the commission to investigate charges that Kohl, the Democratic nominee for Senate, made an improper campaign contribution in 1986 and has not properly identified more than \$20,000 he received through a political action committee for an anti-nuclear group.

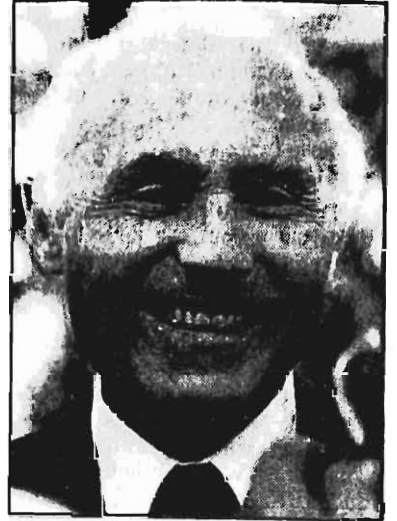
William Christofferson, Kohl's

deputy campaign manager, said the complaint (deliberately) was filed "at the last minute, when they know that there's no way the complaint will be resolved, or any decision will be reached, before the election."

He also disputed the charges themselves.

The GOP committee said Kohl made two donations, totaling \$1,900, to the 1986 campaign of Sen. Alan Cranston, D-Calif., but the second donation was listed in Cranston's reports as coming from Mrs. Herbert Kohl, even though Kohl is unmarried.

Individuals may donate no more than \$1,000 to a candidate per election, although primary and general elections are counted separately.



Herbert Kohl

However, the first check was dated two months after the California primary.

Christofferson confirmed that

Please see KOHL, Page 22

Kohl

From Page 21

Kohl made the two contributions, but he said one check may have been designated for primary campaign expenses, even though written after the primary.

He also said Kohl never wrote a check for "Mrs. Kohl."

The responsibility for keeping track of and returning excess contributions rests with the campaign committee, not the donor, Christofferson said.

The GOP committee also claimed Kohl's Senate campaign has received so-called "bundled contributions" from the Council for a Livable World, an anti-nuclear organization registered as a PAC. Such donations are individual contributions grouped together and channeled through a PAC, and they must be reported by candidates as bundled contributions.

Christofferson said the contributions were individual ones and did not have to be labeled as bundled contributions.

"We got advice on how to report those," he said. "Our understanding is that we have complied with the law."

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GOP raps Kohl over donations

By Doug Mell
Wisconsin State Journal

Senate candidate Herbert Kohl is being accused of violating the federal election law by not properly reporting about \$20,000 in special-interest contributions and for giving \$900 to another Senate candidate in the name of his wife, although he isn't married.

A Kohl campaign spokesman said the charges are unfounded and are an attempt to discredit Kohl in the waning days of his campaign against Republican Susan Engeleiter.

Tom Mason, director of communications and research for the National Republican Senatorial Committee, said a complaint will be filed, probably today, with the Federal Elections Commission alleging Kohl:

✓ Accepted \$20,000 in "bundled contributions" from the Council for a Liveable World, an anti-nuclear group, without declaring the details of the contributions with the election commission.

Bundled contributions are those from individual members of a group that are mailed en masse to the candidate. Mason said federal law requires a candidate to report these contributions "as coming through" a political-action committee, but Kohl didn't.

"If they come from a PAC, they have to be declared as such," Mason said. But Kohl, whose campaign theme is "nobody's senator but yours," wants to "keep his hands clean" of PAC contributions, Mason said, and has put the bundled contributions "elsewhere in the (FEC) report."

✓ Gave \$1,000 in his name and \$900 in the name of Mrs. Herbert Kohl to Sen. Alan Cranston, D-Calif., in 1986.

Mason said federal law allows an individual to give a maximum of \$1,000 in a general-election campaign, which Kohl did. The second contribution from Kohl is listed to Mrs. Kohl, whose address is listed as the same as Kohl's.

Kohl has never been married.
✓ Has received some independent support from the Wisconsin Action Coalition, which the group has reported to the FEC. Mason said the Republican committee wants the



Herbert Kohl

FEC to investigate the relationship between the coalition and William Christofferson, Kohl's deputy campaign manager, because "he has a history of having WAC independent contributions follow him."

The Senatorial campaign committee works for the election of Republicans to the Senate and has committed more than \$300,000 to support Engeleiter.

"It's not surprising that they (Republicans) are continuing to throw unfounded charges at us," Christofferson said when told of the complaint. "They have been doing it for a couple of weeks. In some cases, Sue Engeleiter has been willing to do it herself, (but now is) hiding behind the National Republican Senatorial Committee."

Christofferson said the Kohl committee has "checked diligently" how to report bundled contributions. Many candidates have received similar contributions and "no one has reported them any differently from the way we have. We are perfectly within the law."

About the contribution from a Mrs. Kohl, Christofferson said he couldn't explain why the Cranston committee reported it that way. Kohl has said he made two 1986 contributions to Cranston, one for \$1,000 and one for \$900.

"I would say it's a reporting error by the Cranston committee," Christofferson said.

Christofferson also rejected any notion that he has ties to the action coalition, which calls itself the state's largest consumer protection organization with more than 190 affiliated groups and 75,000 family members.

"I have not had one conversation with anyone from WAC since the first of June" when Kohl entered the race, he said.

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AFFIDAVIT

STATE OF WISCONSIN)
)
MILWAUKEE COUNTY)

William Christofferson being first duly sworn under oath deposes and says:

1) That he was the Assistant Campaign Manager for the campaign of Herbert Kohl for election as United States Senator for the State of Wisconsin.

2) That he makes this affidavit in response to the allegations set forth in the complaint filed by the National Republican Senatorial Committee, MUR 2764.

3) That there was no coordination between the Kohl campaign, Herbert Kohl, any authorized committee for Kohl, nor anyone who was an agent for or otherwise associated with the Kohl campaign and Wisconsin Action Coalition with respect to any independent expenditures undertaken by the Wisconsin Action Coalition relating to Susan Engeleiter and that neither he nor any other person associated with the Kohl campaign cooperated with, consulted with, acted in consort with, requested or suggested that any expenditures be made by Wisconsin Action Coalition with respect to either Susan Engeleiter or Herbert Kohl.

4) That at the time of the receipt of the individual contributor's checks, all of which were signed by the individual contributor and all of which were made payable to Herbert Kohl for United States Senate, Inc., which are listed on pages 3 - 8 of Exhibit 1 attached to the complaint herein, he contacted Mr.

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Jerome Grossman, the treasurer of Council for a Livable World, and confirmed with Mr. Grossman that the Council for a Livable World had not expended any funds on behalf of the Kohl Campaign, that the individual contributions referred to were not "earmarked contributions", and that no other candidates who had received similar types of individual contributions in the past had reported such contributions as "earmarked contributions".

5) That all mailing, printing and other costs related to securing the individual contributions referred to above were paid by the Kohl Campaign.

6) That based on these facts and discussions he made a good faith determination that the individual contributions referred to above were not "earmarked contributions" and were to be reported as individual contributions on the Kohl campaign reports to be filed with the Federal Election Commission.

7) That the matters discussed in the complaint filed by the National Republican Senatorial Committee herein received widespread publicity in the State of Wisconsin beginning October 20, 1988, before the November 8, 1988 general election, and before the time when the Kohl campaign report for the period ending October 19, 1988 was filed with the Federal election Commission on October 27, 1988, so the public was fully aware of the relationship between the individual contributions referred to above and the Council for a Livable World and there could be no "cover-up" nor was there any intent or reason to "cover up"

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such relationship. Attached hereto are copies of newspaper articles from numerous state publications that covered the matter.

8) Attached hereto as Exhibit A and B are copies of two checks drawn by Herbert Kohl and payable to Cranston for Senate campaign.

Dated at Milwaukee, Wisconsin this 18th day of November, 1988.


William Christofferson

Subscribed and sworn to before me this 18th day of November, 1988.

Samuel J. Recht
Notary Public
Milwaukee County, Wisconsin

My commission ~~expires~~ is permanent.

90040300156

HERBERT H. KOHL
825 N. JEFFERSON ST.
MILWAUKEE, WI 53202

10737

August 8 1986 12-2 750 19

PAY TO THE ORDER OF Cranston for Senator** \$ 900.00*

Nine Hundred Dollars and No/Cents----- DOLLARS

FIRST WISCONSIN • MILWAUKEE
FIRST WISCONSIN NATIONAL BANK OF MILWAUKEE

[Handwritten Signature]
HERBERT H. KOHL

FOR
⑆075000022⑆ ⑆14068⑆⑆484⑆ 0737 ⑆0000090000⑆

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748 PAY TO THE ORDER OF
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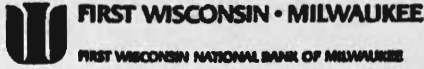
HERBERT H. KOHL
825 N. JEFFERSON ST.
MILWAUKEE, WI 53202

10966

Oct. 24 1986 $\frac{12-2}{750}$ 19

PAY TO THE ORDER OF ***Cranston for Senate*** \$*1,000.00

*One thousand-----DOLLARS



HERBERT H. KOHL

Herb Kohl

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Exhibit B

OCT 20 1988

PAC helps Kohl collect donations

By Cliff Miller

Post-Crescent staff writer

MADISON — Herb Kohl, whose slogan, "Nobody's Senator But Yours," signifies his freedom from political action committee financial influence, is seeking campaign money through an anti-nuclear PAC.

Rosalie Anders, assistant executive director of the Council for a Livable World in Boston, Mass., said Wednesday that the organization in two weeks through Oct. 10 had collected and turned over to Kohl's campaign committee "about \$7,500."

The effort will continue through the Nov. 8 election, she said.

Kohl campaign spokesman William Christofferson insisted that the contributions are not PAC money.

Christofferson and Anders said Kohl's campaign committee paid for printing and mailing fund-raising letters dated Sept. 23 and mailed by the organization to potential contributors.

That cost Kohl more than \$3,000, Christofferson said.

A spokesman for the Federal Elections Commission in Washington said CLW is registered as a PAC for federal election purposes.



Kohl

The fund-raising letter includes a donation form under the heading, "How does giving through Council for a Livable World double my political clout?"

It explains, "We combine your check-with-thousands of contributions from our other supporters and present them to the candidates. You get credit for your individual contributions, the peace movement gets credit, and our lobbying strength for genuine arms control is increased."

Donors are urged to divide themselves into three groups alphabetically. Those whose names begin with the letters A-G are asked to give to the Council, H-O to Mike Lowry, a Democratic Senate candidate from Washington state, and P-Z to Kohl.

Checks intended for Kohl are to be made payable to his campaign committee but are to be sent to CLW.

Christofferson argued that the donations are made out by individuals to Kohl's campaign. Typically, a PAC collects money from individuals too, but gives a single check to the candidate in the name of the PAC.

"The checks are written to us. They (CLW) just collect them and forward them to us," Christofferson said, explaining the distinction.

Fred Eiland, a press spokesman for the Federal Elections Commission, said the practice is known as "bundling." It is legal but both the PAC and the candidate must report that the individual contributions were collected by the PAC.

"This isn't bundling," Christofferson said.

Continued on page 2

Kohl

Christofferson countered, "These are all individual contributions. They're all reported that way."

He said he was unsure whether Kohl had paid the full cost of the solicitation or whether Lowry and CLW shared in the bills.

Kohl's FEC report dated Oct. 14 listed \$4,282,691 funds raised this year, including \$3,835,071 from Kohl personally.

Christofferson said CLW is the only PAC that Kohl has a fundraising arrangement with, but the Wisconsin Nuclear Weapons Freeze committee will announce a similar effort on Friday.

The Wisconsin group, a state-regis-

tered PAC, was organized to back passage of the statewide referendum on a nuclear freeze in 1982.

Christofferson said Kohl also will pay all costs of that group's solicitation.

He said Kohl's position on interest-group influence is misunderstood.

"What is wrong is when those groups, instead of trying to make their case on the merits, try to make it on the basis of how big a check they're going to write."

Christofferson said Kohl "will talk to anybody, he will listen to anybody. He wants support and endorsements from anybody that he agrees with." But he has refused endorsements tied to PAC campaign contributions, he said.

Kohl's Republican opponent, state Senate Minority Leader Susan Engelder, called the Democrat "extremely hypocritical" and said the contributions are "special interest money" despite the Kohl denial.

Kohl has criticized Engelder as well as the Democrats he defeated in the Sept. 13 primary for accepting PAC contributions.

Engelder was reached by telephone in Milwaukee where she was campaigning this morning.

"I think that is extremely hypocritical of him," said Engelder. She said refusal to accept special interest money "is the central theme of his entire campaign. It sounds like PAC money to me. That's special interest money if I've ever seen it."

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207 21 1988

6 PAC funds accepted —

(Continued from page 1)
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pay all costs of that group's solicitation.

Christofferson, who worked for Democrat Ed Garvey in his 1986 U.S. Senate campaign, said he believed CLW raised \$100,000 for Garvey.

He said Kohl's position on interest group influence is misunderstood.

"He has criticized their financial participation in the political process," Christofferson said. "What is wrong is when those groups, instead of trying to make their case on the merits, try to make it on the basis of how big a check they're going to write."

Kohl has criticized especially defense contractors for making campaign contributions.

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But he has refused endorsements tied to PAC campaign contributions, he said.

Kohl's Republican opponent, State Sen. Susan Engeleiter, called the Democrat "extremely hypocritical" and said the contributions are "special interest money," despite the Kohl denial.

Engeleiter was reached by telephone in Milwaukee, where she was campaigning Thursday morning.

Kohl's fundraising arrangement with CLW and Christofferson's explanation were described to her by a reporter.

"Their name (the council's) is on the letterhead. Who pays for the mailing is really immaterial," said Engeleiter. "That is special interest money. I think that is extremely hypocritical of him (Kohl)."

She said refusal to accept special interest money "is the central theme of his entire campaign. It sounds like PAC money to me. That's special interest money if I've ever seen it."

312 Jim ...
— Accepts compromise

Kohl took PAC funds, paper says

MADISON, Wis. (AP) — Herb Kohl, whose slogan, "Nobody's Senator But Yours," emphasizes his refusal of contributions from political action committees, is seeking campaign money through an anti-nuclear PAC, the Appleton Post-Crescent reported.

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The effort will continue through the Nov. 8 election, she said.

The Post-Crescent reported the contributions Thursday.

Kohl campaign spokesman William Christofferson said the contributions are from individuals and are not PAC money.

Christofferson and Anders said Kohl's campaign committee paid for printing and mailing fund-raising (Continued on page 8, col. 1)

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Madison, Wis. 53705
Clipping Bureau Division

Wausau, Daily Herald

Oct 21 1980

312

**Articles claim Kohl
seeking PAC money**

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West Bend Daily News

OCT 21 1988

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312
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That cost Kohl more than \$3,000, Christofferson said.

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312

Herald Times Reporter

Kohl on anti-nuke PAC list

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Oshkosh Northwestern

312
OCT 21 1988

Newspaper says Kohl getting PAC money

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Kohl

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702 Midvale Blvd.
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Clipping Bureau Division

Beloit, Daily News

OCT 22 1988

312
**Kohl campaign denies
violating funding claim**

By The Associated Press

U.S. Senate candidate Herbert H. Kohl received support from California Sen. Alan Cranston as they traveled the Wisconsin campaign trail, denying Kohl has violated his claim of accepting no political funds from special-interest groups.



Kohl

Friday's activity included an announcement that Democratic presidential nominee Michael Dukakis planned a one-hour visit Sunday at an Eau Claire airport while en route from Boston to Los Angeles.

Kohl, a millionaire Democrat from Milwaukee, has argued his self-supported candidacy contrasts with that of his Republican opponent, state legislator Susan Engeleiter.

It was disclosed Thursday that Kohl had a fund-raising arrangement with a Boston-based anti-nuclear organization, the Council for a Livable World.

Kohl campaign director William Christofferson said Friday that Kohl received about \$7,000 from members of the council but not from the organization itself.

Cranston said in Madison that

Kohl's help with the council's fund-raising did not break his pledge to refuse special-interest money.

"That's a general interest, in my mind," Cranston said. "If he had to turn down any money from anybody that belonged to any organization, there wouldn't be any money. Everybody belongs to some organization."

Meanwhile, Mrs. Engeleiter's campaign manager, Jill Hanson, denied her candidate cheated by using notes or prepared statements during a televised debate with Kohl Oct. 12.

Kohl campaign manager Michelle Carrier said Mrs. Engeleiter had insisted that no notes be used, yet made statements from printed matter and should not have had a "need to rely on crib notes or cheat sheets."

Ms. Hanson accused Ms. Carrier of being trivial.

The Engeleiter campaign said a campaign visit she expected next week from President Reagan has been called off because of White House schedules.

She campaigned this week with former President Gerald Ford. In Green Bay, he criticized Dukakis' stand on military spending.

Ford also took aim at Kohl, accusing him of an irresponsible position by proposing to reduce the defense budget by 10 percent, or about \$30 billion.

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Milwaukee, Sentinel

OCT 22 1988

312

Kohl insists he hasn't taken PAC money

By NEIL H. SHIVELY
Sentinel Madison Bureau

Madison — Democrat Herbert H. Kohl insisted Friday he was not violating his vow against taking political action committee funds by accepting support from anti-nuclear weapons groups.

Kohl, with anti-nuclear weapons leader Sen. Alan Cranston (D-Calif.) on hand, accepted the endorsement of the 10,000-member Wisconsin Nuclear Weapons Freeze Campaign in his bid for the US Senate.

Republican State Sen. Susan Engeleiter (R-Brookfield) and Kohl are vying for the Senate seat held by

William Proxmire (D-Wis.), who is retiring.

Engeleiter has been critical of Kohl's defense-cutting posture and recently stepped up her pro-defense rhetoric.

William Christofferson, Kohl's campaign director, said Kohl was not taking money from an anti-nuclear Boston PAC called Council for a Livable World, but that Kohl's campaign had received about \$7,000 from individual members of the group.

In addition, he said, the Kohl campaign will pay the \$3,000 cost of mailing the endorsement notice to members of the Wisconsin freeze movement.

Cranston, a leading proponent of the freeze who won a straw poll for president at the 1983 Wisconsin Democratic convention, said that if Kohl gained Proxmire's seat, Democrats stood a good chance of retaining control of the Senate.

He said Kohl, a multimillionaire businessman, had the experience to make good on his pledge to cut the \$300 billion-a-year defense budget by 10%.

"This is the first time the freeze campaign has endorsed a defense contractor," said the Rev. Timothy Kehl, a Madison minister who is board president of the Wisconsin Nuclear Weapons Freeze Campaign.

Kehl was referring to Engeleiter's coffeecake campaign charge. She said a company Kohl formerly owned had a contract to sell coffeecakes to the military.

The freeze group sprouted from the 1982 statewide referendum in which voters called for a freeze.

(The referendum helped Democrat Anthony S. Earl win nomination for governor in the September 1982 primary, and subsequently the general election.)

Kohl said he wasn't relying on Wisconsin tradition or any polls in linking up with the freeze group.

"This is Herb Kohl being Herb Kohl," he said.

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Wisconsin Rapids Tribune

OCT 21 1988

317 PAC is helping Kohl

MADISON (AP) — Herb Kohl, whose slogan, "Nobody's Senator But Yours," emphasizes his refusal of contributions from political action committees, is seeking campaign money through an anti-nuclear PAC; the Appleton Post-Crescent reported.

Rosalie Anders, assistant executive director of the Council for a Livable World in Boston, Mass., said Wednesday that the organization in two weeks through Oct. 10 had collected and turned over to Kohl's campaign committee "about \$7,500."

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Milwaukee, Journal

OCT 22 1988

312
**Kohl defends \$7,268 gift
from nuclear-freeze group**

By STEVE SCHULTZE
Journal Madison bureau

Madison, Wis. — Democratic Senate candidate Herb Kohl accepted the endorsement of the state Nuclear Weapons Freeze Campaign Friday and defended his acceptance of \$7,268 in contributions from members of a national anti-nuclear weapons group.

Kohl said there was nothing wrong with taking the money, and that doing so was not at odds with his campaign pledge to reject special-interest contributions.

"Obviously I don't think so or I wouldn't do it," Kohl said, following a news conference at the Madison Civic Center.

The \$7,268 came from 71 contributors who are members of the Council for a Livable World, a Boston-based anti-nuclear group.

The council endorsed Kohl last spring and sent letters to its 10,000 members, partially at Kohl's expense. The council itself is registered as a political action committee, but the contributions are legally individual ones, said Bill Christofferson, Kohl's deputy campaign manager.

Said Kohl of the council:

"The fact they endorsed my candidacy is their business. What they requested people around the country to do is their business. These are individual contributions that have come from people around the country."

But Susan Engeleiter, Kohl's Republican opponent, blasted him as

**Dukakis to visit state;
Reagan may cancel out**

Democratic presidential candidate Michael Dukakis will visit Eau Claire at 5:45 p.m. Sunday for an airport rally.

The rally is scheduled during a refueling stop as Dukakis flies between Boston and California.

Meanwhile, President Reagan may not visit Milwaukee on Thursday after all. He had been tentatively scheduled to make an appearance on behalf of Republican US Senate candidate Susan Engeleiter. However, he may be campaigning on behalf of the Republican presidential candidate, George Bush, on that day instead, according to Engeleiter campaign manager Jill Hanson.

a hypocrite.

"This is the worst case of Herb's hypocrisy to date," Engeleiter said in a prepared statement. Kohl has criticized her for taking special interest money, she said, and "now we learn Mr. Kohl has been using a well-known political action committee to collect donations for his campaign."

Even though Kohl's acceptance of the contributions from nuclear freeze supporters was legal, it amounts to the same thing as taking money from special interests, said Jill Hanson, Engeleiter's campaign manager.

"This guy, who has made his whole campaign moral superiority and no special interest money, has taken money from special interests," Hanson said.

The Wisconsin Nuclear Weapons Freeze Campaign endorsed Kohl because of his support for a ban on testing new nuclear weapons and his support for making deep cuts in military spending. Timothy Kehl, freeze campaign chairman, said at the news conference.

The national freeze group's letter urged members to donate either to the Council for a Livable World, to Kohl, or to Mike Lowry, a Democratic Senate candidate from Washington state, according to an article in the Appleton Post-Crescent.

The checks to Kohl that resulted from the solicitation were collected by the national group and forwarded to Kohl's campaign.

Kohl said the peace group endorsements were "very consistent with the kind of campaign I'm going to run."

Sen. Alan Cranston (D-Calif.), a prominent supporter of the nuclear freeze movement, stumped for Kohl Friday in Madison, saying that Kohl would bring a businessman's expertise to the battle against excessive military spending.

"Herb Kohl as a businessman knows how to balance a budget," Cranston said.

Kohl headed the family company that formerly owned Kohl's stores. He also owns the Milwaukee Bucks basketball team.

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Madison, The Capital Times

1977 04 28

Kohl

From Page 23

312
**Kohl says
\$7,268 not
PAC funds**

**Peace organization's
contribution questioned**

From staff, news service reports

Herbert Kohl said today he still is not accepting political action committee money and that it was not inconsistent to solicit funds from members of a peace organization that has a PAC.

The Council for a Livable World, based in Boston, Mass., often sends its members letters asking them to vote for candidates it has endorsed and to contribute to their campaigns.

However, the cost of such mailings by a PAC is considered an in-kind contribution to the candidate. To avoid even an in-kind PAC contribution, the Kohl campaign paid for all the costs of the mailing, said Kohl's press secretary, Bill Christofferson.

The cost for postage, printing, typesetting and materials totaled more than \$3,000, and the Kohl campaign so far has received \$7,268 in contributions from members of CLW, Christofferson said.

Kohl said he has "not in any way been involved with accepting special interest money, and I do not think that is inconsistent."

Kohl spoke at a news conference in Madison at which he received the endorsements of the Wisconsin Nuclear Weapons Freeze Campaign and of U.S. Sen. Alan Cranston, D-Calif., a leading Senate sup-

porter of a nuclear freeze.

The Federal Election Commission in Washington said CLW is registered as a PAC for federal election purposes.

The fund-raising letter on behalf of Kohl includes a donation form under the heading, "How does giving through Council for a Livable World double my political clout?"

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He said CLW is the only PAC that Kohl had a fund-raising arrangement with.

A similar arrangement is being made with the state Freeze Campaign, which claims 10,000 members in Wisconsin, with two differences: the Freeze is not a PAC, and a mailing to its members by the Kohl campaign will not solicit contributions, only their votes, said acting Freeze director Marcia



Herbert Kohl

Slackman.

Christofferson said the mailing will cost 25 cents to 30 cents for each of the 10,000 letters that will go to Freeze members. The Kohl campaign will pay all of the costs, he said.

Christofferson said Kohl's position on interest group influence is misunderstood.

"He has criticized their financial participation in the political process," Christofferson said. "What is wrong is when those groups, instead of trying to make their case on the merits, try to make it on the basis of how big a check they're going to write."

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312

Newspaper reports Kohl seeking money from anti-nuclear PAC

By The Associated Press
Herb Kohl, whose slogan, "Nobody's Senator But Yours," emphasizes his refusal of contributions from political action committees, is seeking campaign money through an anti-nuclear PAC, the Appleton Post-

Peep show store won't remove doors, gets fine

DELAFIELD (AP) — An adult video store faces more than \$3,000 in daily fines for declining to remove the doors of its 14 peep-show booths to comply with a city health ordinance, police said.

But Robert Lerner, an attorney for the owner of Superb Video, said store officials have no intention of removing the doors and will challenge the citations issued by police.

"It seems to me the Delafield Police Department should have higher priorities than this," Lerner said.

Store manager Mark C. Phillips, 35, was cited at the store Oct. 14 while owner Gloria Bishop, of Racine, was cited by certified mail Oct. 17, Police Chief James Vanderwerker said.

The citations ordered the two to remove the doors from the booths, pay \$ 325 each day they fail to comply, or contest the tickets in municipal court on Monday.

Vanderwerker said City Attorney William Chapman wrote store officials earlier this month to inform them they had one week to comply with the ordinance.

Lerner said Bishop and Phillips will mail in innocent pleas and demand a jury trial.

The health ordinance was enacted by the city council in February to prevent the spread of sexually transmitted diseases to those who use the booths.

Suburban creek

Crescent reported.

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"Their name (the council's) is on the letterhead. Who pays for the mail-

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SEP 21 1988

Opinion

Herb Kohl acting suspiciously like a politician

It looks like PAC money.
It walks like PAC money.
It even quacks like PAC money.
But Herb Kohl says it isn't PAC money.
What is it?

According to Kohl, it's just individual campaign contributions from people around the country who are on the PAC's mailing list (which Kohl spent \$3,000 on to help defray printing and mailing costs). The PAC in question, the Boston-based Council for a Livable World, is a liberal, anti-nuke organization that normally wouldn't prove much of an embarrassment to a Democratic candidate such as Kohl, although it probably is more liberal than Kohl would like known.

There are two obvious problems, however:

✓ **The organization is a bona fide political-action committee.** It is registered with the federal government as a PAC, and its literature smells suspiciously like a PAC, especially where it boasts of "our lobbying strength for genuine arms control."

How, one ought to ask, does this square with Kohl's own boast all summer and autumn that he will accept no PAC money in his campaign for the U.S. Senate? If it's not PAC money, what is it? The money is solicited by the PAC, it is sent to the PAC by people whose names are on the PAC mailing list, and the PAC sends the money directly to Kohl. So far it has sent \$7,500, and more is promised.

More pertinent questions center on how Kohl would relate to the PAC after his election to the Senate. Would he succumb to its "lobbying strength"? Would he allow his Senate votes to be affected by the organization? How does that jibe with Kohl's campaign vow to be "nobody's senator but yours"?

✓ **Kohl has made considerable political hay in his campaign against Susan Engeleiter by insisting that he's not a politician, as his opponent clearly is.** If he isn't a politician, he is beginning to look like a politician, sound like a politician and split hairs like a politician.

In an interview at The Post-Crescent last month, Kohl was asked how, if he were elected, he would avoid becoming a politician, as people who work on Capitol Hill inevitably seem to become.

His reply, that he hadn't been a politician for all 53 years of his life and wouldn't start being one now, sounded every bit like someone who is urging voters to shut their eyes when they enter the ballot booth...and vote for him. It is as if he's saying, "Trust me."

Trust usually has to be earned, Mr. Kohl. And talking out of both sides of one's mouth has a nasty habit of causing the evaporation of any that has been earned.

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702 Midvale Blvd.
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Clipping Bureau Division
Appleton, Post-Crescent

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...and jobs with well-wishers as the subject of recent news to greet the former president.

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Foe raps Kohl's 'hypocrisy'

By Tom Fischer-Smith
Post-Crescent staff writer

Herb Kohl's fund-raising collaboration with an anti-nuclear political action committee is "the height of hypocrisy," his U.S. Senate opponent said Thursday in Appleton.

Kohl has touted the fact that he will not accept contributions from political action committees. But Post-Crescent reporter Cliff Miller reported Thursday that a Massachusetts activist group has helped collect and hand over about \$7,500 to the Kohl campaign.

"This is the worst," Susan Engeleiter said during a fund-raiser at Butte des Morts Golf Club. "To have a PAC helping him collect money when he's been bashing all of us."

"A man who questioned my integrity ... and he's had special interests collecting money for him."

Kohl, a Milwaukee Democrat, and Engeleiter, a Republican state senator from Brookfield, are vying for the U.S. Senate seat being vacated by William Proxmire.

An official with the Council for a Livable World in Boston, Mass., said Wednesday that the group collected and turned over about \$7,500 to the Kohl campaign in the two weeks through Oct. 10.

The fundraising will continue through the Nov. 8 election, said Rosalie Anders, CLW's assistant executive director.

Kohl campaign officials said the contributions are not PAC money.



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— Susan Engeleiter

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But Engeleiter said the moves fit "quite a pattern of hypocrisy."

She said Kohl sold his family business to a foreign investor, who cut wages and benefits, but he has frequently criticized allowing foreign buyouts of American companies.

"He's running TV ads saying how terrible it is that foreign governments are buying companies," she said.

Kohl made a \$1,000 contribution to a Wyoming Republican senator while owning land in Wyoming, Engeleiter said.

And he owned a company that sold bakery goods to the Defense Department, she said, a company that received preferential treatment as a small business.

"He's been bashing defense contractors all summer," she said.

Engeleiter's recent offensive against Kohl continued in her Appleton appearance. She harped on Kohl's refusal to appear together before groups or on radio shows, with their only joint appearances the four televised debates.

"I tell you, I've got my Irish up in this race," she said.

The Kohl campaign paid for printing and mailing fund-raising letters that the council mailed to potential contributors.

The letters asked potential donors to make individual contributions to candidates who will help the peace movement and arms control efforts. Checks are made payable to the Kohl campaign but are sent to the CLW, a group registered as a political action committee for federal election purposes.

William Christofferson, Kohl's campaign spokesman, said the contributions are from individuals and

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702 Midvale Blvd.
Madison, Wis. 53705
Clipping Bureau Division
Ashland Daily Press

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Kohl took PAC money, report says



Herb Kohl

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Kohl

(Continued From Page 1)

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The Federal Elections Commission in Washington said CLW is registered as a PAC for federal election purposes.

The fund-raising letter includes a donation form under the heading, "How does giving through Council for a Livable World double my political clout?"

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check with thousands of contributions from our other supporters and present them to the candidates. You get credit for your individual contributions, the peace movement gets credit, and our lobbying strength for genuine arms control is increased."

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702 Midvale Blvd.
Madison, Wis. 53705
Clipping Bureau Division

Eau Claire, Leader-Telegram

21 1988

312

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OCT 21 1988

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ACCORDING TO NEWSPAPER REPORTS

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Newspaper Association

702 Midvale Blvd.
Madison, Wis. 53705
Clipping Bureau Division
Green Bay, Press Gazette

Oct 1 1986

312

Kohl reportedly accepts anti-nuclear group funds

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Janesville Gazette

OCT 21 1988

317 Kane said Thursday. It enables people "to buy and sell little children (and) to exploit women," she said.

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312

PAC man?

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See KOHL, B-3

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Clipping Bureau Division

La Crosse, Tribune

1989

Kohl funding

Continued from B-1

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Clipping Bureau Division

Waukesha, Freeman

OCT 21 1988

312
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funding from an anti-nuke PAC**

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"These are all individual contributions. They're all reported that way."

He said he was unsure whether Kohl had paid the full cost of the solicitation or whether Lowry and CLW shared in the bills.

Kohl's FEC report dated Oct. 14 listed \$4,282,661 raised this year including \$3,835,071 from Kohl personally.

Christofferson said CLW is the only PAC that Kohl had a fundraising arrangement with, but the Wisconsin Nuclear Weapons Freeze committee will announce similar effort on Friday at a news conference in Madison.

The Wisconsin group, a state-registered PAC, was organized to back passage of the statewide referendum on a nuclear freeze in 1982.

Christofferson said Kohl also will pay all costs of that group's solicitation.

Christofferson, who worked for Democrat Ed Garvey in his 1966 U.S. Senate campaign, said he believed CLW raised \$100,000 for Garvey.

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 5, 1988

Lynn Oliphant, Esquire
Manatt, Phelps, Rothenberg & Evans
1200 New Hampshire Avenue, N.W., Suite 200
Washington, D.C. 20036

RE: MUR 2764
Wisconsin Action
Coalition PAC - WACPAC

Dear Ms. Oliphant:

Following receipt of your Designation of Counsel Statement, which we received on November 23, 1988, this letter responds to yours dated November 15, requesting an extension until December 13 to respond to the complaint in this matter. After considering the circumstances presented in you letter, I have granted the requested extension. Accordingly, your response is due by the close of business on December 13, 1988.

If you have any questions, please contact Robert Raich, the attorney handling this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

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MANATT, PHELPS, ROTHENBERG & EVANS

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

ATTORNEYS AT LAW

1200 NEW HAMPSHIRE AVENUE, N.W.

SUITE 200

WASHINGTON, D.C. 20036

TELEPHONE (202) 463-4300

LOS ANGELES

1385 WEST OLYMPIC BOULEVARD

LOS ANGELES, CALIFORNIA 90064

(213) 245-4000

December 13, 1988

Lawrence M. Noble
General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 2764

Dear Mr. Noble:

This response is submitted on behalf of the Wisconsin Action Coalition Political Action Committee (WACPAC) to the complaint filed in the above-referenced matter. For the reasons set forth below, the Commission should find no reason to believe that WACPAC has violated the Federal Election Campaign Act of 1971, as amended (FECA or the Act).

This complaint filed by the National Republican Senatorial Committee (NRSC) suggests that there may have been coordination between WACPAC and the campaign of Herb Kohl for Senate that might have destroyed the independence of WACPAC's independent expenditures against Susan Engeleiter in the 1988 Wisconsin primary. First, the complaint does not set forth any specific facts or evidence supporting the assertion that there may have been coordination between the Kohl campaign and WACPAC. Second, there was no coordination between WACPAC and the Kohl campaign. As WACPAC's FEC reports clearly reflect, WACPAC did not support Kohl in the primary or general election and in fact supported Kohl's primary opponent (Ed Garvey) at the time the expenditures were made against Engeleiter.

I. The Complaint Does Not Set Forth Any Facts Establishing A Violation Of Any Provision Of The Act By WACPAC.

This complaint does not state even a single fact or describe a single situation which suggests coordination between WACPAC and the Kohl campaign. Nor does the complaint provide a shred of evidence to support a conclusion of coordination. In its discussion of this alleged violation, the NRSC states simply that an assistant campaign manager for Kohl previously worked for other candidates who were supported by WACPAC in the past, without even providing the names of any such candidates or the

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Lawrence M. Noble
December 13, 1988
Page 2

circumstances or dates of those elections. This statement provides no basis for even an inference of coordination between WACPAC and Kohl.

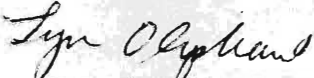
Under the FEC regulations, a complaint is supposed to set forth "a clear and concise recitation of the facts which describes a violation of a statute or regulation over which the Commission has jurisdiction." 11 C.F.R. § 111.4(d)(3). This complaint does not set forth any facts at all with respect to WACPAC and its activities and should be dismissed.

II. WACPAC Did Not Coordinate With Kohl's Campaign.

In fact, the complaint's assertions that WACPAC's expenditures benefitted Kohl and were coordinated with Kohl's campaign are absurd.^{1/} A review of the same FEC reports reviewed by the complainant in preparing this complaint reveals that WACPAC endorsed Kohl's opponent, Ed Garvey, in the Wisconsin primary campaign and made expenditures on his behalf against Kohl. Exhibit A, Affidavit of James J. Eagan. At the very time WACPAC made the expenditures against Engeleiter, it had endorsed Garvey and was actively supporting him in his race against Kohl. As set forth in Mr. Eagan's affidavit, there was no coordination whatsoever with the Kohl campaign. Exhibit A.

For these reasons, this complaint should be dismissed immediately insofar as it alleges any violation of the Act against WACPAC.

Sincerely,


Lyn Utrecht Oliphant
Manatt, Phelps, Rothenberg
& Evans

^{1/} The complaint challenges expenditures made by WACPAC against Engeleiter which were made during the Republican primary campaign. Kohl and Engeleiter were not even opponents, so there is no basis in fact for the unsubstantiated assertion in the complaint that Kohl benefited from WACPAC's expenditures, particularly in light of the fact that WACPAC was at the same time actively supporting Kohl's opponent.

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EXHIBIT A

THE WISCONSIN ACTION COALITION POLITICAL ACTION COMMITTEE

WAC-PAC

Suite 633

152 W. Wisconsin Ave.

Milwaukee, Wisconsin 53203

I, the undersigned, hereby swear that WAC-PAC did not coordinate or cooperate in any manner with the Kohl for Senate Campaign, Mr. William Christofferson, or any campaign employees.

WAC-PAC never endorsed Senator Kohl's candidacy.

In fact, WAC-PAC endorsed the candidacy of his opponent, Mr. Edward Garvey, and expended funds to elect Mr. Garvey and defeat Mr. Kohl in the September Senate Primary. These expenditures were properly reported to the FEC.

Any anti-Engleleiter activities were carried out in an independent matter, as reported to the FEC. There was certainly no coordination with the Kohl campaign before or after the primary.

When funds were expended to oppose the candidacy of Susan Engleleiter, WAC-PAC was actively opposing the candidacy of Herb Kohl and had endorsed his opponent.

WAC-PAC has operated in an open and legal matter, with all expenditures reported to the FEC as required.

James J. Eagan

James J. Eagan, WAC-PAC Treasurer

December 12, 1988

*Dated this 12th Day of December
Rita A. James Notary
My Commission Expires
7-9-89*

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Nov 27 64

CAMPAIGN FINANCE REPORT
Short Form
State of Wisconsin

OFFICE USE:

500542 g

- Spring Fall Special Pre-Primary 19 ___ Continuing Report due Jan. 31, 19 ___
 Spring Fall Special Pre-Election 19 ___ Continuing Report due July 10, 19 82

Name of Candidate or Committee (in full)

WIS Nuclear Weapons Freeze Campaign

Address (number and street)

Box 169

City, State and ZIP Code

Madison WI 53701

I declare that the above named committee or candidate did not receive contributions, make disbursements or incur obligations during the period covered by this report and that the cash balance remains the same as previously reported. This report fulfills filing requirements pursuant to Sec. 11.06(9), Wisconsin Statutes

Signature of Committee Treasurer or Candidate

[Handwritten Signature]

Date

3/1/82

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COMMISSIONERS BOARD

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FEDERAL RESERVE BANK OF CHICAGO

CAMPAIGN FINANCE REPORT

Short Form

State of Wisconsin

OFFICE USE:

500542

Spring Fall Special Pre-Primary 19

Continuing Report due Jan. 31, 19 89

Spring Fall Special Pre-Election 19

Continuing Report due July 10, 19

Name of Candidate or Committee (in full)

WI Nuclear Weapons Freeze Campaign

Address (number and street)

c/o Matt Herrick, Box 169

City, State and ZIP Code

Madison WI 53701

I declare that the above named committee or candidate did not receive contributions, make disbursements or incur obligations during the period covered by this report and that the cash balance remains the same as previously reported. This report fulfills filing requirements pursuant to Sec. 11.06(9), Wisconsin Statutes

Signature of Committee Treasurer or Candidate

Date

1/2/89

(EB 214 80)

CAMPAIGN FINANCE REPORT

Short Form

State of Wisconsin

OFFICE USE:

500542

Spring Fall Special Pre-Primary 19

Continuing Report due Jan. 31, 19 89

Spring Fall Special Pre-Election 19

Continuing Report due July 10, 19

Name of Candidate or Committee (in full)

WI Nuclear Weapons Freeze Campaign

Address (number and street)

c/o Matt Herrick, Box 169

City, State and ZIP Code

Madison WI 53701

I declare that the above named committee or candidate did not receive contributions, make disbursements or incur obligations during the period covered by this report and that the cash balance remains the same as previously reported. This report fulfills filing requirements pursuant to Sec. 11.06(9), Wisconsin Statutes

Signature of Committee Treasurer or Candidate

Date

1/8/88

(EB-2a 4/80)

3 6/9/88

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

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT

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FIRST GENERAL COUNSEL'S REPORT

SENSITIVE

MUR #: 2764
DATE COMPLAINT RECEIVED
BY OGC: 11/4/88
DATE OF NOTIFICATION TO
RESPONDENTS: 11/4/88
STAFF MEMBER: R. Raich

EXECUTIVE SESSION
JUN 27 1989

COMPLAINANT: Jann L. Olsten, Executive Director, National
Republican Senatorial Committee

RESPONDENTS: Herb Kohl for United States Senate, Inc. and Linda
de la Mora, as treasurer
Herb Kohl
Wisconsin Action Coalition PAC - WACPAC and
James Jeffrey Eagan, as treasurer
Cranston for Senate '92, Inc. and Solomon M. Kamm,
as treasurer
Council for a Livable World and Eliot Hubbard, as
treasurer

RELEVANT STATUTES: 11 C.F.R. § 110.6(c)(3)
11 C.F.R. § 110.6(a)
2 U.S.C. § 434(b)
2 U.S.C. § 441a(a)(1)(A)
2 U.S.C. § 441f
11 C.F.R. § 110.1(b)
2 U.S.C. § 441a(f)
2 U.S.C. § 434(b)(3)(A)

INTERNAL REPORTS CHECKED: Index of Disclosure Documents
Committees' Disclosure Reports
MUR 2633
MUR 1028

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

The complaint alleges three separate sets of violations:

1) that Herb Kohl for United States Senate, Inc. (the
"Committee") failed to report it was the recipient of earmarked
contributions that passed through a conduit, namely Council for a
Livable World; 2) that independent expenditures by Wisconsin
Action Coalition PAC - WACPAC may have been conducted in

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coordination with the Committee; and 3) that Herb Kohl made improper contributions to Cranston for Senate '86 (the "Cranston Committee").^{1/} The Committee, its treasurer, and Herb Kohl have all filed responses to the complaint. (Attachments I and II)

Pursuant to the discussion at the Commission's executive session of February 28, 1989, the General Counsel's Office has now analyzed the payments for solicitations by Council for a Livable World ("CLW") in which it sought earmarked contributions to the Committee, and the Committee's financial arrangements for a communication to Wisconsin Nuclear Weapons Freeze committee ("Freeze committee") members. On April 17, 1989, this Office received Wisconsin campaign finance reports regarding this latter organization.

II. FACTUAL AND LEGAL ANALYSIS

A. Earmarked Contributions

1. Reporting of Contributions Received through CLW

The intended recipient of an earmarked contribution shall disclose on its next report each conduit through which the contribution passed. 11 C.F.R. § 110.6(c)(3).

The parties agree that the Committee failed to report certain contributions it received from individuals as having been transmitted to it through Council for a Livable World, a multicandidate political committee registered with the Commission. Rather, the Committee reported receipt of those contributions as if they had been received directly from the

^{1/} On January 13, 1988, the Cranston Committee changed its name to Cranston for Senate '92, Inc.

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individual contributors. On its own FEC report, Council for a Livable World did report that it acted as a conduit for those earmarked contributions.

In its response to the complaint, the Committee notes that the contributions at issue total \$7,248; the remainder of the contributions mentioned in the complaint (totaling approximately \$14,000) was received by the Committee after the expiration of the period covered by the Pre-General Election Report. The Committee has reported those contributions as earmarked contributions on its Post-General Election Report, the first report due following the filing of the complaint.

The contributions at issue were in the form of checks directed and made payable to the Committee but sent by the contributors to Council for a Livable World, which then bundled those contributions and delivered them to the Committee. The Committee argues that it did not need to report the contributions it received as earmarked contributions because the Committee paid all mailing, printing, and other costs for the solicitations that generated those contributions. The question of who paid for solicitation costs, however, is not a meaningful area of inquiry into whether resulting contributions are earmarked. The regulations governing earmarked contributions address "all contributions" which are "in any way . . . directed to" a candidate through an intermediary or conduit. See 11 C.F.R. § 110.6(a).

Accordingly, the contributions at issue, totaling \$7,248, were earmarked contributions requiring disclosure as such.

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Because the Committee failed to report those contributions as earmarked contributions, this Office recommends that the Commission find reason to believe the Committee and its treasurer violated 11 C.F.R. § 110.6(c)(3).

2. Reporting of In-Kind Contributions

Each report of receipts and disbursements shall disclose all contributions from other political committees, as well as the identification of each political committee which makes a contribution to the reporting committee, together with the date and amount of any such contribution. 2 U.S.C. §§ 434(b)(2)(D) and (3)(B).

According to newspaper articles submitted with the Committee's response to the complaint, in the solicitation, dated September 23, 1988, CLW asked contributors to divide themselves alphabetically into three groups. Those whose last names began with the letters A-G were asked to contribute to CLW, H-O to Mike Lowry (a Senatorial candidate from Washington state), and P-Z to Herb Kohl. Some of the articles quote a Kohl Committee spokesman as saying Kohl's cost for the solicitations was more than \$3,000. As is next discussed, the public record indicates there were certain Kohl Committee payments approximating that amount.

The Kohl Committee reports making a \$1,666.67 disbursement on September 15, 1988 to S & S Mailing of Hyattsville, Maryland for "POSTAGE." On that same date, the Kohl Committee also reports making a \$400 disbursement to CLW for "ENVELOPES & POSTAGE," as well as another disbursement to S & S Mailing of \$290 for "MAILING SERVICES," a \$50 disbursement to Grimwoods of

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Washington, D.C. for "TYPESETTING," and an \$816.67 disbursement to Cantrell/Cutler Printing of Washington, D.C. for "PRINTING." Together those disbursements total \$3,223.34, but we cannot be certain they were all in connection with the CLW solicitation.

Also on September 15, 1988, CLW itself reports making a single \$1,666.66 disbursement to S & S Mailing Service as an in-kind contribution to the Lowry Committee for "mailing service" (with a memo entry stating the contribution was to repay a primary debt). Because CLW reports no other disbursements that appear to relate to this mailing and because the Kohl Committee's apparent expenditures for the solicitation are nearly double those of CLW on behalf of the Lowry Committee, the Kohl Committee may have paid more than its proportionate share of the solicitation's costs, possibly resulting in in-kind contributions to CLW. CLW, however, reports receiving no in-kind contributions from the Kohl Committee. Accordingly, this Office recommends that the Commission find reason to believe CLW and its treasurer, and the Kohl Committee and its treasurer, violated 2 U.S.C. § 434(b).^{2/} This Office further recommends that the Commission approve the attached discovery requests, which concern the allocation of costs for the solicitation.^{3/}

^{2/} The available evidence suggests that the Lowry Committee acknowledged as an in-kind contribution what appears to have been its share of the solicitation costs. Therefore, this Office does not recommend making the Lowry Committee a respondent at this time.

^{3/} The complaint did not include a copy of the solicitation letter itself and there is no information regarding what, if any, disclaimer appeared on the letter. The attached discovery requests call for production of the solicitation. Should scrutiny of the solicitation indicate a disclaimer problem, this Office will make appropriate recommendations.

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3. Wisconsin Nuclear Weapons Freeze

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A number of the newspaper articles accompanying the response state that in addition to the CLW bundling activity, "the Wisconsin Nuclear Weapons Freeze committee will announce a similar effort," and that the group is "a state-registered PAC." Reports on file with the Commission indicate that a federal political committee, the Wisconsin Nuclear Weapons Freeze PAC, was inactive during 1988. Further, reports filed with the State of Wisconsin indicate that WI Nuclear Weapons Freeze Campaign, a non-federal committee, was also inactive during 1988. Statements in the newspaper articles thus suggest the possibility that an unregistered entity may have made contributions or expenditures in connection with a federal election by soliciting and bundling contributions, and raise the possibility that the Kohl Committee may have accepted prohibited in-kind contributions. Another published description of the Freeze committee's effort, however, indicates that no such solicitation of contributions took place. According to The Capital Times of Madison, Wisconsin (Attachment I, page 31):

A similar arrangement is being made with the state Freeze Campaign, which claims 10,000 members in Wisconsin, with two differences: the Freeze is not a PAC, and a mailing to i[t]s members by the Kohl campaign will not solicit contributions, only their votes, said acting Freeze director Marcia Slackman.

Christofferson said the mailing will cost 25 cents to 30 cents for each of the 10,000 letters that will go to Freeze members. The Kohl campaign will pay all the costs, he said.

This Office notes that the Kohl Committee reports paying the Wisconsin Nuclear Weapons Freeze campaign \$386.80 on November 28, 1988 for "MAILING LABELS," but no other receipts or disbursements can be linked to that organization. The Kohl Committee does report making numerous other disbursements to vendors on that same date. Though some of those disbursements were for printing and postage, this Office cannot tell whether they concerned the communication to Freeze members.

Because the Kohl Committee's "similar effort" with the Freeze committee apparently involved no earmarked contributions, but rather a communication to persons on its mailing list, paid for entirely by the Kohl Committee, the General Counsel's Office makes no recommendations with respect to this issue.

B. Independent Expenditures

The term "independent expenditure" means payment for an express advocacy communication which is not made in concert with, at the request or suggestion of, or in cooperation or consultation with any authorized committee or agent of a candidate. 2 U.S.C. § 431(17). An expenditure made in cooperation, consultation, or concert with, or at the request or suggestion of, a candidate, his authorized committees, or their agents, is considered to be a contribution to such candidate. 2 U.S.C. § 441a(a)(7)(B)(i). Any political committee not authorized by a candidate must report all independent expenditures it makes, as well as the name and address of each political committee that has received a contribution from the reporting committee, together with the date and amount of such

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contribution. 2 U.S.C. §§ 434(b)(4)(H)(iii), 434(b)(6)(B)(i), and 434(b)(4)(H)(i). Each political committee must report the total amount of all receipts, the total amount of all contributions from other political committees, and the identification of each political committee that makes a contribution to the reporting committee, together with the date and amount of such contribution. 2 U.S.C. §§ 434(b)(2)(D) and 434(b)(3)(B).

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The complaint suggests there may have been coordination between the Committee and WACPAC concerning \$336.04 of disbursements WACPAC reported as independent expenditures opposing Herb Kohl's opponent, Susan Engeleiter. Those expenditures were for consultant fees and travel expenses. If the expenditures were coordinated with the campaign, the disbursements in question would not have been independent expenditures, but rather would have been in-kind contributions, requiring disclosure as such by both WACPAC and the Committee. The basis in the complaint for the allegation that the disbursements were in-kind contributions is that "Kohl assistant campaign manager Christofferson has benefitted from WAC contributions in the past through his work for other WAC-supported candidates." The Respondents' submissions, however, indicate that there was no coordination, and that WACPAC's expenditures were in fact independent. In his sworn affidavit, the Committee's Assistant Campaign Manager states

That there was no coordination between the Kohl campaign, Herbert Kohl, any authorized committee for Kohl, nor anyone who was an agent for or otherwise associated with

the Kohl campaign and Wisconsin Action Coalition with respect to any independent expenditures undertaken by the Wisconsin Action Coalition relating to Susan Engeleiter and that neither he nor any other person associated with the Kohl campaign cooperated with, consulted with, acted in consort with, requested or suggested that any expenditures be made by Wisconsin Action Coalition with respect to either Susan Engeleiter or Herbert Kohl.

Moreover, WACPAC's treasurer swears that WACPAC "did not coordinate or cooperate in any manner with the Kohl for Senate Campaign, Mr. William Christofferson, or any campaign employees."

In view of the insubstantiality of the complaint's allegation and these sworn statements, this Office recommends that the Commission find no reason to believe WACPAC and its treasurer, or the Committee and its treasurer, violated 2 U.S.C. § 434(b) with regard to this issue.

C. Excessive Contribution

No person may make a contribution in the name of another person. 2 U.S.C. § 441f. No person may make contributions to any authorized political committee aggregating in excess of \$1,000 with respect to any election. 2 U.S.C. § 441a(a)(1)(A). "With respect to any election" means the next election for federal office after the contribution is made, unless the contribution is designated in writing by the contributor for a particular election. 11 C.F.R. § 110.1(b)(2)(ii). A contribution designated in writing for a particular election, but made after that election, shall be made only to the extent that the contribution does not exceed net debts outstanding from such

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election. 11 C.F.R. § 110.1(b)(3). No political committee may knowingly accept any excessive contribution. 2 U.S.C. § 441a(f). Each disclosure report filed by a political committee must disclose the identification of each person who makes a contribution to the committee in excess of \$200. 2 U.S.C. § 434(b)(3)(A).

The Cranston Committee reported receiving \$900 for the general election on August 8, 1986 from Herbert H. Kohl. The Cranston Committee also reported receiving \$1,000 on November 3, 1986 from a "Mrs. Herbert Kohl." Mr. Kohl has never been married. Copies of Mr. Kohl's checks constituting those contributions (Attachment I, p. 19-20) indicate that both checks were drawn on only Mr. Kohl's bank account and were signed only by Mr. Kohl. Accordingly, this Office recommends finding no reason to believe Herb Kohl violated 2 U.S.C. § 441f.

There is no indication on either check suggesting that Mr. Kohl designated his contributions for any particular election. The 1986 California senatorial primary election was on June 3, 1986. The 1986 general election was on November 4, 1986. In addition, both the 1986 Pre-Primary Election Report and the following Quarterly Report filed by the Cranston Committee suggest that it had a very large cash on hand surplus and no net outstanding debts or obligations from the 1986 primary election. Accordingly, it appears that Mr. Kohl made both contributions with respect to the 1986 general election. Because those contributions totaled \$1,900, Mr. Kohl may have made a \$900 excessive contribution. Therefore, this Office recommends that

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the Commission find reason to believe Herb Kohl violated 2 U.S.C. § 441a(a)(1)(A).

Similarly, it appears that the Cranston Committee may have knowingly accepted a \$900 excessive contribution. Moreover, it appears that the Cranston Committee incorrectly reported receiving a \$1,000 contribution from a "Mrs." Kohl. Accordingly, this Office recommends that the Commission find reason to believe the Cranston Committee and its treasurer violated 2 U.S.C. §§ 441a(f) and 434(b)(3)(A). On the basis of the information in the complaint, the Cranston Committee did not appear to be a proper respondent, but in light of the currently available information this Office recommends making the Cranston Committee a respondent and sending it a Factual and Legal Analysis.

III. RECOMMENDATIONS

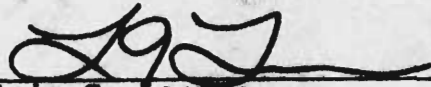
1. Find reason to believe Herb Kohl for United States Senate, Inc. and Linda de la Mora, as treasurer, violated 11 C.F.R. § 110.6(c)(3).
2. Find reason to believe Herb Kohl for United States Senate, Inc. and Linda de la Mora, as treasurer, violated 2 U.S.C. § 434(b) with regard to solicitations for earmarked contributions through Council for a Livable World.
3. Find reason to believe Council for a Livable World and Eliot Hubbard, as treasurer, violated 2 U.S.C. § 434(b).
4. Find no reason to believe Herb Kohl for United States Senate, Inc. and Linda de la Mora, as treasurer, violated 2 U.S.C. § 434(b) with regard to certain independent expenditures by Wisconsin Action Coalition PAC - WACPAC.
5. Find no reason to believe Wisconsin Action Coalition PAC - WACPAC and James Jeffrey Eagan, as treasurer, violated 2 U.S.C. § 434(b), and close the file with respect to those respondents.

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- 6. Find no reason to believe Herb Kohl violated 2 U.S.C. § 441f.
- 7. Find reason to believe Herb Kohl violated 2 U.S.C. § 441a(a)(1)(A).
- 8. Find reason to believe Cranston for Senate '92, Inc. and Solomon M. Kamm, as treasurer, violated 2 U.S.C. §§ 441a(f) and 434(b)(3)(A).
- 9. Approve the attached Factual and Legal Analyses and discovery requests.
- 10. Approve and send the attached letters.

Lawrence M. Noble
General Counsel

 6-13-89
Date

BY: 
Lois G. Lerner
Associate General Counsel

Attachments

- I. Committee and Kohl's response
- II. WACPAC's response
- III. Factual and Legal Analyses
- IV. Discovery requests
- V. Letters

90040800198



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: **LAWRENCE M. NOBLE**
 GENERAL COUNSEL

FROM: **MARJORIE W. EMMONS**

DATE: **JUNE 16, 1989**

SUBJECT: **OBJECTIONS TO MUR 2764 - 1st G.C. Report**
 Signed June 13, 1989.

The above-captioned document was circulated to the Commission on Wednesday, June 14, 1989 at 4:00 p.m.

Objections have been received from the Commissioners as indicated by the name(s) checked:

Commissioner Aikens	_____
Commissioner Elliott	_____
Commissioner Josefiak	_____
Commissioner McDonald	_____ XX _____
Commissioner McGarry	_____
Commissioner Thomas	_____

This matter will be placed on the Executive Session agenda for Tuesday, June 27, 1989.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

YJR

OFFICE OF THE CHAIRMAN

MEMORANDUM

FEDERAL ELECTION COMMISSION
SECRETARIAT
20 JUN 22 PM 5:06

TO: Marjorie W. Emmons
Commission Secretary

FROM: Danny L. McDonald
Chairman

RE: MUR 2764

DATE: June 22, 1989

Please note that I would like to withdraw my objection to MUR 2764 and cast my vote in the affirmative.

Thank you for your attention in this matter.

90040300200

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Herb Kohl for United States Senate, Inc.) MUR 2764
and Linda de la Mora, as treasurer)
Herb Kohl)
Wisconsin Action Coalition PAC - WACPAC and)
James Jeffrey Eagan, as treasurer)
Cranston for Senate '92, Inc. and Solomon M.)
Kamm, as treasurer)
Council for a Livable World and Eliot Hubbard,)
as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on June 22, 1989, the Commission decided by a vote of 5-0 to take the following actions in MUR 2764:

1. Find reason to believe Herb Kohl for United States Senate, Inc. and Linda de la Mora, as treasurer, violated 11 C.F.R. § 110.6(c) (3).
2. Find reason to believe Herb Kohl for United States Senate, Inc. and Linda de la Mora, as treasurer, violated 2 U.S.C. § 434(b) with regard to solicitations for earmarked contributions through Council for a Livable World.
3. Find reason to believe Council for a Livable World and Eliot Hubbard, as treasurer, violated 2 U.S.C. § 434(b).
4. Find no reason to believe Herb Kohl for United States Senate, Inc. and Linda de la Mora, as treasurer, violated 2 U.S.C. § 434(b) with regard to certain independent expenditures by Wisconsin Action Coalition PAC - WACPAC.

(Continued)

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5. Find no reason to believe Wisconsin Action Coalition PAC - WACPAC and James Jeffrey Eagan, as treasurer, violated 2 U.S.C. § 434(b), and close the file with respect to those respondents.
6. Find no reason to believe Herb Kohl violated 2 U.S.C. § 441f.
7. Find reason to believe Herb Kohl violated 2 U.S.C. § 441a(a)(1)(A).
8. Find reason to believe Cranston for Senate '92, Inc. and Solomon M. Kamm, as treasurer, violated 2 U.S.C. §§ 441a(f) and 434(b)(3)(A).
9. Approve the Factual and Legal Analyses and discovery requests, as recommended in the First General Counsel's report signed June 13, 1989.
10. Approve and send the letters, as recommended in the First General Counsel's report signed June 13, 1989.

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

Attest:

6-26-89

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in the Office of Commission Secretary:	Wed., 6-14-89,	10:16
Circulated on 48 hour tally basis:	Wed., 6-14-89,	4:00
Objection placed on agenda:	Fri., 6-16-89,	5:06
Objection withdrawn:	Thurs., 6-22-89,	5:04

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 5, 1989

Samuel J. Recht, Esquire
Quarles & Brady
411 East Wisconsin Avenue
Milwaukee, Wisconsin 53202

RE: MUR 2764
Herb Kohl for United
States Senate, Inc. and
Linda de la Mora, as
treasurer
Herb Kohl

Dear Mr. Recht:

On November 4, 1988, the Federal Election Commission notified your clients of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). Copies of the complaint were forwarded to your clients at that time.

Upon further review of the allegations contained in the complaint, and information supplied by you, the Commission, on June 22, 1989, found no reason to believe Herb Kohl for United States Senate, Inc. (the "Committee") and Linda de la Mora, as treasurer, violated 2 U.S.C. § 434(b) with regard to certain independent expenditures by Wisconsin Action Coalition PAC - WACPAC. On that same date, the Commission found reason to believe the Committee and its treasurer violated 11 C.F.R. § 110.6(c)(3), and 2 U.S.C. § 434(b) with regard to solicitations for earmarked contributions through Council for a Livable World. On that date the Commission also found no reason to believe Herb Kohl violated 2 U.S.C. § 441f, and reason to believe Herb Kohl violated 2 U.S.C. § 441a(a)(1)(A). The Factual and Legal Analysis, which formed a basis for the Commission's findings, is attached for your information.

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

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Samuel J. Recht
Page 2

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

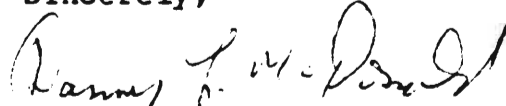
If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of the General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, the Commission will not entertain requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent.

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

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

If you have any questions, please contact Robert Raich, the attorney handling this matter, at (202) 376-8200.

Sincerely,


Danny L. McDonald
Chairman

Enclosure

Factual and Legal Analysis
Interrogatories and Requests for Production of Documents

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: Herb Kohl for United States Senate, Inc. and Linda de la Mora, as treasurer
Herb Kohl MUR: 2764

The complaint alleges three separate sets of violations:

1) that Herb Kohl for United States Senate, Inc. (the "Committee") failed to report it was the recipient of earmarked contributions that passed through a conduit, namely Council for a Livable World ("CLW"); 2) that independent expenditures by Wisconsin Action Coalition PAC - WACPAC may have been conducted in coordination with the Committee; and 3) that Herb Kohl made improper contributions to Cranston for Senate '86.

A. Earmarked Contributions

1. Reporting of contributions Received through CLW

The intended recipient of an earmarked contribution shall disclose on its next report each conduit through which the contribution passed. 11 C.F.R. § 110.6(c)(3).

The parties agree that the Committee failed to report certain contributions it received from individuals as having been transmitted to it through Council for a Livable World, a multicandidate political committee registered with the Commission. Rather, the Committee reported receipt of those contributions as if they had been received directly from the individual contributors. On its own FEC report, Council for a Livable World did report that it acted as a conduit for those earmarked contributions.

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In its response to the complaint, the Committee notes that the contributions at issue total \$7,248; the remainder of the contributions mentioned in the complaint (totaling approximately \$14,000) was received by the Committee after the expiration of the period covered by the Pre-General Election Report. The Committee has reported those contributions as earmarked contributions on its Post-General Election Report, the first report due following the filing of the complaint.

The contributions at issue were in the form of checks directed and made payable to the Committee but sent by the contributors to Council for a Livable World, which then bundled those contributions and delivered them to the Committee. The Committee argues that it did not need to report the contributions at issue as earmarked contributions because the Committee paid all mailing, printing, and other costs for the solicitations that generated those contributions. The question of who paid for solicitation costs, however, is not a meaningful area of inquiry into whether resulting contributions are earmarked. The regulations governing earmarked contributions address "all contributions" which are "in any way . . . directed to" a candidate through an intermediary or conduit. See 11 C.F.R. § 110.6(a).

Accordingly, the contributions at issue, totaling \$7,248, were earmarked contributions requiring disclosure as such. Because the Committee failed to report those contributions as

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earmarked contributions, there is reason to believe the Committee and its treasurer violated 11 C.F.R. § 110.6(c)(3).

2. Reporting of In-Kind Contributions

Each report of receipts and disbursements shall disclose all contributions from other political committees, as well as the identification of each political committee which makes a contribution to the reporting committee, together with the date and amount of any such contribution. 2 U.S.C. §§ 434(b)(2)(D) and (3)(B).

According to newspaper articles submitted with the Committee's response to the complaint, in the solicitation, dated September 23, 1988, CLW asked contributors to divide themselves alphabetically into three groups. Those whose last names began with the letters A-G were asked to contribute to CLW, H-O to Mike Lowry (a Senatorial candidate from Washington state), and P-Z to Herb Kohl. Some of the articles quote a Kohl Committee spokesman as saying Kohl's cost for the solicitations was more than \$3,000. As is next discussed, the public record indicates there were certain Kohl Committee payments approximating that amount.

The Kohl Committee reports making a \$1,666.67 disbursement on September 15, 1988 to S & S Mailing of Hyattsville, Maryland for "POSTAGE." On that same date, the Kohl Committee also reports making a \$400 disbursement to CLW for "ENVELOPES & POSTAGE," as well as another disbursement to S & S Mailing of \$290 for "MAILING SERVICES," a \$50 disbursement to Grimwoods of Washington, D.C. for "TYPESETTING," and an \$816.67 disbursement to

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Cantrell/Cutler Printing of Washington, D.C. for "PRINTING." Together those disbursements total \$3,223.34, but the Commission cannot be certain they were all in connection with the CLW solicitation.

Also on September 15, 1988, CLW itself reports making a single \$1,666.66 disbursement to S & S Mailing Service as an in-kind contribution to the Lowry Committee for "mailing service" (with a memo entry stating the contribution was to repay a primary debt). Because CLW reports no other disbursements that appear to relate to this mailing and because the Kohl Committee's apparent expenditures for the solicitation are nearly double those of CLW on behalf of the Lowry Committee, the Kohl Committee may have paid more than its proportionate share of the solicitation's costs, possibly resulting in in-kind contributions to CLW. CLW, however, reports receiving no in-kind contributions from the Kohl Committee. Accordingly, there is reason to believe the Committee and its treasurer violated 2 U.S.C. § 434(b).

B. Independent Expenditures

The term "independent expenditure" means payment for an express advocacy communication which is not made in concert with,

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at the request or suggestion of, or in cooperation or consultation with any authorized committee or agent of a candidate. 2 U.S.C. § 431(17). An expenditure made in cooperation, consultation, or concert with, or at the request or suggestion of, a candidate, his authorized committees, or their agents, is considered to be a contribution to such candidate. 2 U.S.C. § 441a(a)(7)(B)(i). Each political committee must report the total amount of all receipts, the total amount of all contributions from other political committees, and the identification of each political committee that makes a contribution to the reporting committee, together with the date and amount of such contribution. 2 U.S.C. §§ 434(b)(2)(D) and 434(b)(3)(B).

The complaint suggests there may have been coordination between the Committee and WACPAC concerning \$336.04 of disbursements WACPAC reported as independent expenditures opposing Herb Kohl's opponent, Susan Engeleiter. Those expenditures were for consultant fees and travel expenses. If the expenditures were coordinated with the campaign, the disbursements in question would not have been independent expenditures, but rather would have been in-kind contributions, requiring disclosure as such by both WACPAC and the Committee. The basis in the complaint for the allegation that the disbursements were in-kind contributions is that "Kohl assistant campaign manager Christofferson has benefitted from WAC contributions in the past through his work for other WAC-

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supported candidates." The Respondents' submissions, however, indicate that there was no coordination, and that WACPAC's expenditures were in fact independent. In his sworn affidavit, the Committee's Assistant Campaign Manager states

That there was no coordination between the Kohl campaign, Herbert Kohl, any authorized committee for Kohl, nor anyone who was an agent for or otherwise associated with the Kohl campaign and Wisconsin Action Coalition with respect to any independent expenditures undertaken by the Wisconsin Action Coalition relating to Susan Engeleiter and that neither he nor any other person associated with the Kohl campaign cooperated with, consulted with, acted in consort with, requested or suggested that any expenditures be made by Wisconsin Action Coalition with respect to either Susan Engeleiter or Herbert Kohl.

In view of the insubstantiality of the complaint's allegation and this sworn statement, there is no reason to believe the Committee and its treasurer violated 2 U.S.C. § 434(b) with regard to this issue.

C. Excessive Contribution

No person may make a contribution in the name of another person. 2 U.S.C. § 441f. No person may make contributions to any authorized political committee aggregating in excess of \$1,000 with respect to any election. 2 U.S.C. § 441a(a)(1)(A). "With respect to any election" means the next election for federal office after the contribution is made, unless the contribution is designated in writing by the contributor for a particular election. 11 C.F.R. § 110.1(b)(2)(ii). A contribution designated in writing for a particular election, but

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made after that election, shall be made only to the extent that the contribution does not exceed net debts outstanding from such election. - 11 C.F.R. § 110.1(b)(3).

Cranston for Senate '86 reported receiving \$900 for the general election on August 8, 1986 from Herbert H. Kohl. Cranston for Senate '86 also reported receiving \$1,000 on November 3, 1986 from a "Mrs. Herbert Kohl." Mr. Kohl has never been married. Copies of Mr. Kohl's checks constituting those contributions indicate that both checks were drawn on only Mr. Kohl's bank account and were signed only by Mr. Kohl. It thus appears that Cranston for Senate '86 incorrectly reported receiving a contribution from a "Mrs." Kohl. Accordingly, there is no reason to believe Herb Kohl violated 2 U.S.C. § 441f.

There is no indication on either check suggesting that Mr. Kohl designated his contributions for any particular election. The 1986 California senatorial primary election was on June 3, 1986. The 1986 general election was on November 4, 1986. In addition, both the 1986 Pre-Primary Election Report and the following Quarterly Report filed by Cranston for Senate '86 suggest that it had a very large cash on hand surplus and no net outstanding debts or obligations from the 1986 primary election. Accordingly, it appears that Mr. Kohl made both contributions with respect to the 1986 general election. Because those contributions totaled \$1,900, Mr. Kohl may have made a \$900 excessive contribution. Therefore, there is reason to believe Herb Kohl violated 2 U.S.C. § 441a(a)(1)(A).

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 5, 1989

Mr. Eliot Hubbard, Treasurer
Council for a Livable World
20 Park Plaza
Boston, Massachusetts 02116

RE: MJR 2764
Council for a Livable World
and Eliot Hubbard, as
treasurer

Dear Mr. Hubbard:

On June 22, 1989, the Federal Election Commission found that there is reason to believe Council for a Livable World (the "Committee") and you, as treasurer, violated 2 U.S.C. § 434(b), a provision of the Federal Election Campaign Act of 1971, as amended (the "Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

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

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

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of the General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, the Commission will not entertain requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent.

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Mr. Eliot Hubbard
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 the General Counsel ordinarily will not give extensions beyond 20 days.

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

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

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Robert Raich, the attorney handling this matter, at (202) 376-8200.

Sincerely,


Danny L. McDonald
Chairman

Enclosures

- Factual and Legal Analysis
- Interrogatories and Requests for Production of Documents
- Designation of Counsel Form
- Procedures

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: Council for a Livable World
and Eliot Hubbard, as treasurer

MUR: 2764

This issue arises as a result of information obtained by the Commission's General Counsel's Office during the course of carrying out its supervisory responsibilities under the Act.

Each report of receipts and disbursements shall disclose all contributions from other political committees, as well as the identification of each political committee which makes a contribution to the reporting committee, together with the date and amount of any such contribution. 2 U.S.C. §§ 434(b)(2)(D) and (3)(B).

According to newspaper articles obtained by the Commission, in a solicitation dated September 23, 1988, Council for a Livable World ("CLW") asked contributors to divide themselves alphabetically into three groups. Those whose last names began with the letters A-G were asked to contribute to CLW, H-O to Mike Lowry, and P-Z to Herb Kohl. Some of the articles quote a Kohl Committee spokesman as saying Kohl's cost for the solicitations was more than \$3,000. As is next discussed, the public record indicates there were certain Kohl Committee payments approximating that amount.

The Kohl Committee reports making a \$1,666.67 disbursement on September 15, 1988 to S & S Mailing of Hyattsville, Maryland for "POSTAGE." On that same date, the Kohl Committee also reports making a \$400 disbursement to CLW for "ENVELOPES &

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POSTAGE," as well as another disbursement to S & S Mailing of \$290 for "MAILING SERVICES," a \$50 disbursement to Grimwoods of Washington, D.C. for "TYPESETTING," and an \$816.67 disbursement to Cantrell/Cutler Printing of Washington, D.C. for "PRINTING." Together those disbursements total \$3,223.34, but the Commission cannot be certain they were all in connection with the CLW solicitation.

Also on September 15, 1988, CLW itself reports making a single \$1,666.66 disbursement to S & S Mailing Service as an in-kind contribution to the Lowry Committee for "mailing service" (with a memo entry stating the contribution was to repay a primary debt). Because CLW reports no other disbursements that appear to relate to this mailing and because the Kohl Committee's apparent expenditures for the solicitation are nearly double those of CLW on behalf of the Lowry Committee, the Kohl Committee may have paid more than its proportionate share of the solicitation's costs, possibly resulting in in-kind contributions to CLW. CLW, however, reports receiving no in-kind contributions from the Kohl Committee.

On the basis of the record presently before the Commission, the Commission cannot determine whether the committees properly allocated the costs of the solicitations and whether any resulting in-kind contributions were properly reported. Accordingly, there is reason to believe CLW and its treasurer violated 2 U.S.C. § 434(b).

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 5, 1989

**Solomon M. Kamm, Treasurer
Cranston for Senate '92, Inc.
400 South Hope Street, 18th Floor
Los Angeles, California 90071**

**RE: MUR 2764
Cranston for Senate '92,
Inc. and Solomon M.
Kamm, as treasurer**

Dear Mr. Kamm:

On June 22, 1989, the Federal Election Commission found that there is reason to believe Cranston for Senate '92, Inc. ("Committee") and you, as treasurer, violated 2 U.S.C. §§ 441a(f) and 434(b)(3)(A), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

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

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

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of the General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, the Commission will not entertain requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent.

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Solomon M. Kamm
Page 2

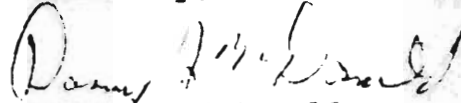
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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

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

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Robert Raich, the attorney handling this matter, at (202) 376-8200.

Sincerely,


Danny L. McDonald
Chairman

Enclosures
Factual and Legal Analysis
Procedures
Designation of Counsel Form

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: Cranston for Senate '92, Inc. MUR: 2764
and Solomon M. Kamm,
as treasurer

This issue arises as a result of information obtained by the Commission's General Counsel's Office during the course of carrying out its supervisory responsibilities under the Act.

No person may make contributions to any authorized political committee aggregating in excess of \$1,000 with respect to any election. 2 U.S.C. § 441a(a)(1)(A). "With respect to any election" means the next election for federal office after the contribution is made, unless the contribution is designated in writing by the contributor for a particular election. 2 U.S.C. § 110.1(b)(2)(ii). A contribution designated in writing for a particular election, but made after that election, shall be made only to the extent that the contribution does not exceed net debts outstanding from such election. 11 C.F.R. § 110.1(b)(3). No political committee may knowingly accept any excessive contribution. 2 U.S.C. § 441a(f). Each disclosure report filed by a political committee must disclose the identification of each person who makes a contribution to the committee in excess of \$200. 2 U.S.C. § 434(b)(3)(A).

Cranston for Senate '92, Inc. (the "Cranston Committee")^{*/} reported receiving \$900 for the 1986 general election on August 8, 1986 from Herbert H. Kohl. The Cranston Committee also reported receiving \$1,000 on November 3, 1986 from a "Mrs.

^{*/} On January 13, 1988 the Cranston Committee changed its name from Cranston for Senate '86.

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Herbert Kohl." Mr. Kohl has never been married. Mr. Kohl's checks constituting those contributions indicate that both checks were drawn on only Mr. Kohl's bank account and were signed only by Mr. Kohl.

There is no indication on either check suggesting Mr. Kohl designated his contribution for any particular election. The 1986 California senatorial primary election was on June 3, 1986. The 1986 general election was on November 4, 1986. In addition, both the 1986 Pre-Primary Election Report and the following Quarterly Report filed by the Cranston Committee suggest it had a very large cash on hand surplus and no net outstanding debts or obligations from the 1986 primary election. Accordingly, it appears that Mr. Kohl made both contributions with respect to the 1986 general election. Because those contributions totaled \$1,900, it appears that the Cranston Committee may have knowingly accepted a \$900 excessive contribution. Moreover, it appears that the Cranston Committee incorrectly reported receiving a \$1,000 contribution from a "Mrs." Kohl. Accordingly, there is reason to believe the Cranston Committee and its treasurer violated 2 U.S.C. §§ 441a(f) and 434(b)(3)(A).

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 5, 1989

Lynn Oliphant, Esquire
Manatt, Phelps, Rothenberg & Evans
1200 New Hampshire Avenue, N.W., Suite 200
Washington, D.C. 20036

RE: MUR 2764
Wisconsin Action Coalition PAC
- WACPAC and James Jeffrey
Eagan, as treasurer

Dear Ms. Oliphant:

On November 4, 1988, the Federal Election Commission notified your clients of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

On June 22, 1989, the Commission found, on the basis of the information in the complaint, and information provided by you and other persons, that there is no reason to believe your clients violated 2 U.S.C. § 434(b). Accordingly, the Commission closed its file in this matter as it pertains to your clients.

This matter will become a part of the public record within 30 days after the file has been closed with respect to all respondents. If you wish to submit any materials to appear on the public record, please do so within ten days. Please send such materials to the Office of the General Counsel.

The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
Factual and Legal Analysis

90040300220

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: Wisconsin Action Coalition MUR: 2764
PAC - WACPAC and James Jeffrey
Eagan, as treasurer

The complaint in this matter alleges, inter alia, that independent expenditures by Wisconsin Action Coalition PAC - WACPAC may have been conducted in coordination with Herb Kohl for United States Senate, Inc. (the "Committee").

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The term "independent expenditure" means payment for an express advocacy communication which is not made in concert with, at the request or suggestion of, or in cooperation or consultation with any authorized committee or agent of a candidate. 2 U.S.C. § 431(17). An expenditure made in cooperation, consultation, or concert with, or at the request or suggestion of, a candidate, his authorized committees, or their agents, is considered to be a contribution to such candidate. 2 U.S.C. § 441a(a)(7)(B)(i). Any political committee not authorized by a candidate must report all independent expenditures it makes, as well as the name and address of each political committee that has received a contribution from the reporting committee, together with the date and amount of such contribution. 2 U.S.C. §§ 434(b)(4)(H)(iii), 434(b)(6)(B)(i), and 434(b)(4)(H)(i).

The complaint suggests there may have been coordination between the Committee and WACPAC concerning \$336.04 of disbursements WACPAC reported as independent expenditures

opposing Herb Kohl's opponent, Susan Engeleiter. Those expenditures were for consultant fees and travel expenses. If the expenditures were coordinated with the Committee, the disbursements in question would not have been independent expenditures, but rather would have been in-kind contributions, requiring disclosure as such by WACPAC. The basis in the complaint for the allegation that the disbursements were in-kind contributions is that "Kohl assistant campaign manager Christofferson has benefitted from WAC contributions in the past through his work for other WAC-supported candidates." The Respondents' submissions, however, indicate that there was no coordination, and that WACPAC's expenditures were in fact independent. In a statement to the Commission, WACPAC's treasurer swears that WACPAC "did not coordinate or cooperate in any manner with the Kohl for Senate Campaign, Mr. William Christofferson, or any campaign employees."

In view of the insubstantiality of the complaint's allegation and this sworn statement, there is no reason to believe WACPAC and its treasurer violated 2 U.S.C. § 434(b) in this matter.

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RONALD C. PETERSON
FORTIETH FLOOR
355 SOUTH GRAND AVENUE
LOS ANGELES, CALIFORNIA 90071-3101
(213) 683-0600

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE SERVICES BRANCH

89 JUL 17 AM 10:25

CRANSTON V. KRAMER

July 12, 1989

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
89 JUL 17 PM 3:53

9004000223

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

Re: MUR 2764

Dear Mr. Raich:

Enclosed please find a Statement of Designation of Counsel designating me as attorney for Cranston for Senate '92, Inc. and Solomon M. Kamm, as Treasurer, in the above-referenced proceeding.

This letter confirms my request for an extension of time to submit any factual or legal materials relevant to the allegations so that such materials may be deposited in the U.S. mail on or before August 11, 1989.

Your professional courtesy and cooperation is greatly appreciated.

Sincerely,


Ronald C. Peterson

RCP:lv
Enclosure
(1215T)

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2764

NAME OF COUNSEL: Ronald C. Peterson, Esq.

ADDRESS: 355 South Grand Avenue

40th Floor

Los Angeles, CA 90071-3101

TELEPHONE: (213) 683-0649

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.

July 12, 1989
Date

Solomon M. Kamm
Signature

SOLOMON M. KAMM

RESPONDENT'S NAME: Solomon M. Kamm, Esq.

ADDRESS: 400 South Hope Street

Suite 1050

Los Angeles, CA 90071

HOME PHONE: _____

BUSINESS PHONE: (213) 669-6298

90040300224

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411 East Wisconsin Avenue
Milwaukee, Wisconsin 53202-4487
414/277-5000
Telecopier 414/271-3652

Offices in
Milwaukee and Madison, Wisconsin
West Palm Beach and Naples, Florida
Phoenix, Arizona

Quarles / Brady

July 18, 1989

VIA FACSIMILE

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

Attention: Robert Raich

Re: MUR 2764
Herb Kohl for United
States Senate, Inc. and
Linda de la Mora, as
Treasurer
Herb Kohl

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIL ROOM
89 JUL 18 AM 11:51

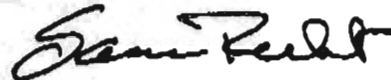
Dear Mr. Raich:

This letter will confirm our request today for an extension of time to respond to the Commission's Factual and Legal Analysis and the Interrogatories and Request for Production of Documents which were received in our office on July 7, 1989. Our request is to extend the time for such responses to July 31, 1989. We would appreciate confirmation of your granting this requested extension as we discussed on the telephone.

Thank you very much for your consideration in this matter.

Very truly yours,

QUARLES & BRADY



Samuel J. Recht

SJR/ed

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE
89 JUL 18 PM 12:15

90040600225



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 20, 1989

Ronald C. Peterson, Esquire
Fortieth Floor
355 South Grand Avenue
Los Angeles, California 90071

RE: MUR 2764
Cranston for Senate '92, Inc. and
Solomon M. Kamm, as
treasurer

Dear Mr. Peterson:

This is in response to your letter dated July 12, 1989, which we received on July 17, requesting an extension until August 11 to respond to the reason to believe notice in this matter. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by the close of business on August 11, 1989.

If you have any questions, please contact Robert Raich, the attorney handling this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

A handwritten signature in cursive script, appearing to read "Lois G. Lerner".

BY: Lois G. Lerner
Associate General Counsel

90040300226



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 20, 1989

Samuel J. Recht, Esquire
Quarles & Brady
411 East Wisconsin Avenue
Milwaukee, Wisconsin 53202

RE: MUR 2764
Herb Kohl for United States
Senate, Inc. and Linda de la
Mora, as treasurer
Herb Kohl

Dear Mr. Recht:

This is in response to your letter dated July 18, 1989, requesting an extension until July 31 to respond to the reason to believe notice in the matter. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by the close of business on July 31, 1989.

If you have any questions, please contact Robert Raich, the attorney handling to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

A handwritten signature in cursive script, appearing to read "Lois G. Lerner".

By: Lois G. Lerner
Associate General Counsel

90040300227

HAND DELIVERED
RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

06c 3630

411 East Wisconsin Avenue
Milwaukee, Wisconsin 53202-4497
414/277-5000
FAX 414/277-5591

Attorneys at Law in
Milwaukee and Madison, Wisconsin
West Palm Beach and Naples, Florida
Phoenix, Arizona

89 AUG -1 AM 10:45

Quarles & Brady

July 31, 1989

VIA FEDERAL EXPRESS

Federal Election Commission
999 E. Street, f N.W.
Washington DC 20463

Attention: Mr. Robert Raich

Re: MUR2764
Herb Kohl and Herb Kohl for United States Senate, Inc.

Dear Mr. Raich:

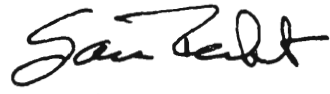
Enclosed you will find the original and a copy of the response of Herb Kohl and Herb Kohl for United States Senate, Inc. to the Reason to Believe Notice and the Factual and Legal Analysis in the above referenced matter. Also enclosed is the original and a copy of the Response to Interrogatories and Requests for Production of Documents.

Please advise if there is any other material that is required to be filed.

Thank you very much for your consideration in this matter.

Very truly yours,

QUARLES & BRADY



Samuel J. Recht

SJR/ed
Enclosures

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
89 AUG -1 PM 3:25

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BEFORE THE FEDERAL ELECTION COMMISSION
OF THE UNITED STATES

IN THE MATTER OF:

Herb Kohl for United States Senate, Inc. and
Lynda de la Mora, as Treasurer,

Herb Kohl

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MUR 2764

This is in response to the reason to believe notice and the Factual and Legal Analysis forwarded by the Federal Election Commission in the above matter. Its purpose is to demonstrate that no action should be taken against the respondents.

A. Alleged Earmarked Contributions.

1. Reporting of contributions.

Herb Kohl for United States Senate, Inc., continues to maintain the position that the relevant contributions were not "earmarked contributions" and were not improperly reported on the Committee's pre-general election report filed on October 27, 1988. The whole area of "earmarked contributions" and reporting procedures with respect thereto is hardly free of ambiguity, uncertainty and doubt. The relevant Section of the Act, 2 U.S.C. 441 a (a)(7), (8), does not define "earmarked," "intermediary" or "conduit," requires a report only by the

20040300229

intermediary or conduit and does not require any report from the recipient¹.

The Kohl Committee reasonably concluded that if it paid the full cost of the solicitation, its arrangement with the Council would not constitute "earmarking." In effect the Kohl Committee treated the Council as an agent; the Council contributed only effort, not money. In this respect the relationship between the Kohl Committee and the Council was no different from that of any political committee and an agent for fundraising purposes. At no time has the Commission suggested that an organization or individual functioning as an agent for those purposes must also, and automatically, assume the reporting responsibilities of an intermediary or conduit.

The Commission's regulations confirm that there is a difference between a fundraising "agent," on the one hand, and an intermediary or conduit, on the other, but those same regulations do not explain the difference. Section 102.8 refers to "persons" who receive contributions "for" authorized and unauthorized political committees. It charges them with the responsibility to transmit contributions that they receive within a specified period of time. In subsection (c), these transmittal requirements are stated to apply also to "earmarked contributions transmitted by an intermediary or conduit." Thus "persons" receiving contributions "for" political committees are

¹While it would be premature to raise the issue of the Commission's power to promulgate a regulation containing a new reporting requirement, with sanctions for non-compliance, on a subject where Congress has already spoken, that issue has contributed to uncertainty in this area.

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not synonymous with "intermediaries" or "conduits" but all three -- persons, intermediaries or conduits -- must comply with the transmittal time requirements.

In similar fashion Section 102.9 refers to the accounting requirements which must be followed by the Treasurer of a political committee "or an agent authorized by the Treasurer to receive contributions" Nowhere in Section 102.9 does there appear a reference to the earmarking regulations -- or any suggestion that "an agent authorized by the Treasurer to receive contributions" must follow reporting requirements applicable to intermediaries or conduits. The manner in which agents are distinguishable from an intermediary or conduit remains undefined under this regulation also.

When does an organization or an individual become an agent, and when an intermediary or conduit? The regulations provide no answer. The Kohl Committee operated on the assumption that the source of funding was significant in this regard.

With no motive or intent to deceive, the Kohl Committee proceeded on a reasonable understanding of the law. It is now entangled in a regulatory proceeding which turns on a forced interpretation of a regulation. The Factual and Legal Analysis cites only 11 CFR Section 110.6(a). It quotes from that regulation to support the position that the question of who paid for solicitation costs is not a meaningful area of inquiry into whether resulting contributions are earmarked. While the portions of the regulation quoted are correctly quoted, the emphasis made is not correct. The operative function of section

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110.6(a) is to establish, in accordance with the Act, that the contributions "are contributions from the person to the candidate." This is precisely the position taken in the respondent's original response.

Any ambiguity is not fairly resolved against the Kohl Committee particularly where there is no evidence of any scheme to violate the core purposes of the earmarking regulations²

The respondent's original response made clear that the involvement of the Council for a Livable World was the subject of repeated widespread publicity and the manner in which the respondent Committee reported the contributions was based on a good faith determination in this area which is, as stated above, hardly free from doubt. In this setting, we believe that it would be appropriate for the Commission to take no action against the respondents in this matter.

2. Reporting of In-Kind Contributions.

The solicitation of September 23, 1988 sought funds for three entities: Council for a Livable World, Mike Lowry for U.S. Senate and Herb Kohl for U.S. Senate. It was arranged prior to the mailing of the solicitation that the costs of the solicitation would be divided three ways and that the Kohl Committee would pay its one-third share of such costs. In addition the Kohl Committee desired an additional 15,000 of the

²On at least one other occasion (MUR 2282) in a highly publicized case brought under the earmarking regulations, the Commission was divided over the meaning of those regulations on a crucial point. It is respectfully submitted that the regulations are no clearer here and that any uncertainty should be no more glossed over in this case than in MUR 2282.

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printed candidate profiles and it was to pay the cost of such profiles. Estimates of the costs were secured and on September 15, 1988, the Kohl Committee made the following disbursements based on those estimates:

S&S Mailing of Hyattsville, Maryland for postage	\$1,666.67
S&S Mailing of Hyattsville, Maryland for mailing service	290.00
Counsel for A Livable World for envelopes and postage	400.00
Grimwoods of Washington D.C. for typesetting	50.00
Cantrell/Cutter Printing of Washington D.C. for printing	<u>816.67</u>
	<u>\$3,223.34</u>

The Kohl Committee has been informed that the total costs of the solicitation was \$8,910.47 made up of the following items:

S&S Mailing	\$5,514.60
Grimwoods	232.14
Envelopes	615.80
Cantrell/Cutter	<u>2,547.93*</u>
	<u>\$8,910.47</u>

*The Cantrell/Cutter invoices which are attached to the answers to interrogatories include 15,000 additional Kohl candidate profiles at a cost of \$565.10.

One-third of the costs of the solicitation turned out to be \$2,970.16; the cost of the extra candidate profiles turned out

20040300233

to be \$565.10; the total was \$3,535.26. The Kohl Committee paid a total of \$3,223.34 based on the estimates. The balance of \$311.92 resulted from minor variations in the estimates and the Kohl Committee has received an invoice from Counsel for a Livable World for the \$311.92.

The Kohl Committee has been informed that the Council for a Livable World paid the balance of the cost of the solicitation. Thus it is clear that the Kohl Committee did not pay more than its proportionate share of the costs of the solicitation and made no in-kind contribution to the Council.

B. Excessive Contribution.

The original complaint in this matter focused on a claim that a contribution to Alan Cranston's 1986 Senate Campaign was reported in the name of Mrs. Herbert Kohl and that Herbert Kohl was not married. The response established that the contributions involved were made by Herbert Kohl. It was obvious that the manner in which the Cranston Committee reported the contribution was an error and the Commission has so determined. However, the Factual and Legal Analysis goes on to point out that both contributions were made after the California primary election and that the reports of the Cranston Committee "suggest" that it had a large cash surplus and no outstanding debts from the 1986 primary.

While it is common knowledge that the \$1,000 contribution limitation applies separately to a candidate's primary and general election campaigns, it is virtually impossible for a contributor to know the specific financial

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status of the campaign on any particular day. No doubt this is why the regulations impose obligations on the recipient to return contributions which are determined to be in excess of the applicable limits and in most cases the recipients compliance machinery "catches" the error.

It is clear that the Cranston Committee made an error in the manner in which it reported the second contribution as coming from Mrs. Kohl. Perhaps this resulted in an error in accepting the full amount of the contribution without return.

A contributor's good faith belief that his contributions are within the limitations for contributions to primary and general election campaigns is not impugned by a failure of the recipient to return an excess contribution or by a subsequent analysis that suggests the campaign could no longer accept contributions to a primary campaign. The error was a simple mistake, it was not Mr. Kohl's, and no action should be taken against him.

Dated this 31st day of July, 1989.

Respectfully submitted,

Samuel J. Recht
Samuel J. Recht
Quarles & Brady
411 East Wisconsin Avenue
Milwaukee WI 53202

Attorneys for Herb Kohl for
United States Senate, Inc.,
and Herb Kohl

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**BEFORE THE FEDERAL ELECTION COMMISSION
OF THE UNITED STATES**

IN THE MATTER OF:

**Herb Kohl for United States Senate, Inc. and
Lynda de la mora, as Treasurer**

MUR 2764

**RESPONSE TO INTERROGATORIES AND
REQUESTS FOR PRODUCTION OF DOCUMENTS**

20040300236

Question 1. State the total amount of all disbursements that in any way pertain to the solicitation.

Answer 1. Herb Kohl for United States Senate, Inc. (the "Committee") disbursed a total amount of \$3,223.34. The Committee has received an invoice from the Council for a Livable World for \$311.92. The total of these two sums includes the \$565.10 cost of extra Kohl profiles that were not used in the solicitation. The Committee has been informed by the Council for a Livable World ("CLW") that it expended \$5,471.33 in cash and used envelopes it previously purchased having a cost of \$615.80. The invoices relating to the expenses are attached hereto as Exhibit A and consist of the following:

1. Four invoices from Cantrell/Cutter

Printing, Inc.	\$ 355.56
	1,351.82
	786.72
	<u>618.93</u>
Subtotal	\$3,113.03

Less extra Kohl Profiles 565.10

Total \$2,547.93

2. Invoice from Grimwoods \$232.14.

3. Invoice from S&S Mailing Service \$5,415.60.

4. Invoice showing CLW cost of envelopes \$615.80.

5. Invoice for \$311.92 from CLW including recap of expenditures. This recap contains a typographical error in the "Kohl Paid" column. The amount paid by Kohl to the Cantrell/Cutter firm was \$816.67 rather than \$616.67.

The total expenditures on the solicitation (not including the extra Kohl profiles not used in the solicitation at a cost of \$565.10) were \$8,910.47. The amounts disbursed by the Kohl Committee were based on the best available estimates of the costs at the time of disbursement.

Question 2. Separately with regard to every disbursement made in connection with the solicitation:

a. Identify the person who made each such disbursement.

b. Identify the person who received each such disbursement; and

c. State the date, amount, and purpose of each such disbursement.

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Answer 2.

<u>Disbursed By</u>	<u>Disbursements Rec'd By</u>	<u>Date</u>	<u>Amount</u>	<u>Purpose</u>
Kohl Committee	S&S Mailing Service	9/15/88	\$1666.67	Postage
Kohl Committee	S&S Mailing Service	9/15/88	290.00	Mailing Service
Kohl Committee	CLW	9/15/88	400.00	Envelopes and Postage
Kohl Committee	Grimwoods	9/15/88	50.00	Typesetting
Kohl Committee	Cantrell/Cutter	9/15/88	816.67	Printing
CLW	S&S Mailing Service	9/15/88	3333.33	Postage
CLW	S&S Mailing Service	10/24/88	224.60	Mailing Service
CLW	Grimwoods	10/24/88	182.14	Typesetting
CLW	Cantrell/Cutter	10/24/88	1731.26	Printing

Note: the information relating to disbursements by CLW was provided to the Kohl Committee by Rosalie Anders, assistant executive director of CLW.

Question 3. Explain the basis for allocating the costs of the solicitation among the persons who made disbursements in connection with it.

Answer 3. The solicitation sought funds for three entities: CLW, Mike Lowry for U.S. Senate and Herb Kohl for United States Senate, Inc. It was arranged that the costs of the solicitation would be divided three ways and that the Kohl Committee would pay its one-third share of such costs.

Question 4. Produce a complete example of the solicitation.

Answer 4. See Exhibit B attached.

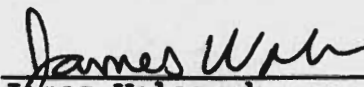
Question 5. Produce all documents that in any way relate, pertain, or refer to the solicitation.

Answer 5. See Exhibit A and B.

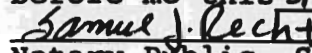
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Question 6. Identify the natural person answering these Interrogatories and Requests for Production of Documents, and identify each person who provided any information used in answering.

Answer 6. These interrogatories were answered by James Woloszyk, 825 N. Jefferson Street, Milwaukee, Wisconsin; 700 Meadow Lane, Elm Grove, WI 53122; (414) 271-6600, (414) 784-6393. Information relating to CLW was provided by Rosalie Anders, executive assistant of CLW.


James Woloszyk

Subscribed and sworn to
before me this 31st day of July, 1989.


Notary Public, State of Wisconsin.
My Commission is permanent.

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90040300240

EXHIBIT A.



04-9/27/88 C96
Johnson



Cantrell/Cutter Printing, Inc.



499 South Capitol St., S.W.
Suite 101
Washington, D.C. 20003
202-546-6332

TO [COUN./LIVABLE WORLD
100 MARYLAND AVE.
WASHINGTON , DC 20002]

INVOICE NO. 4212

AR00319

PURCHASE ORDER NO. NA		REQUISITIONED BY NA	TERMS 30 DAYS NET	JOB NO. 4212	DATE 9/26/88
ITEM	QUANTITY	DESCRIPTION		UNIT PRICE	TOTAL PRICE
	21,000	CONTRIBUTION CARD.			
		SUBTOTAL			335.44
		DC TAX.....			20.12
		TOTAL.....			355.56

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9/28/88
John Isaac

C9C

499 South Capitol St., S.W.
Suite 101
Washington, D.C. 20003
202-546-6332

TO

COUN./LIVABLE WORLD
100 MARYLAND AVE.
WASHINGTON, DC 20002

INVOICE NO. 4214

AR00319

PURCHASE ORDER NO. NA		REQUISITIONED BY JOHN	TERMS 30 DAYS NET	JOB NO. 4214	DATE 9/26/88
ITEM	QUANTITY	DESCRIPTION		UNIT PRICE	TOTAL PRICE
	36,000	KOHL PROFILE (C-96).			
			SUBTOTAL		1275.31
			DC TAX.....		76.51
			TOTAL.....		1351.82

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1462.54
1537.22 =
9/27
1139.60

3418.81
Total
~~3418.81~~
L318.37

1139.60
end
Kohl
816.67

1139.60 =
ink



on 9/28/88 C96
John Sosa

499 South Capitol St., S.W.
Suite 101
Washington, D.C. 20003
202-546-6332

TO
COUN./LIVABLE WORLD
100 MARYLAND AVE.
WASHINGTON, DC 20002

INVOICE NO. 4215

AR00319

PURCHASE ORDER NO. NA		REQUISITIONED BY NA	TERMS 30 DAYS NET	JOB NO. 4215	DATE 9/26/88
ITEM	QUANTITY	DESCRIPTION		UNIT PRICE	TOTAL PRICE
	21,000	LOWRY PROFILE (C-96).			
			SUBTOTAL		742.19
			DC TAX.....		44.53
			TOTAL.....		786.72

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Ch 9/28/88 C96
 Johnson
 499 South Capitol St., S.W.
 Suite 101
 Washington, D.C. 20003
 202-546-6332

TO [COUN./LIVABLE WORLD
 100 MARYLAND AVE.
 WASHINGTON , DC 20002]

INVOICE NO. 4213

AR00319

PURCHASE ORDER NO. NA		REQUISITIONED BY NA	TERMS 30 DAYS NET	JOB NO. 4213	DATE 9/26/88
ITEM	QUANTITY	DESCRIPTION		UNIT PRICE	TOTAL PRICE
	21,000	GROSSMAN LETTER. (C-96).			
			SUBTOTAL		583.90
			DC TAX.....		35.03
			TOTAL.....		618.93

21040300244

Grimwoods

PHOTOTYPESETTING • PASTEUP

OK
9/21/88
Jh [unclear]

NO.

DATE:

9/21/88

JOB NO:

PO NO:

1228 G STREET, S.E. • WASHINGTON, D.C. 20003 • 546-7205

TO: *Council for a Lindbergh World*

SUBJECT: *295 mailing - Sept. 88*

PAGES:

PRICE PER PAGE:

TYPESETTING:

3 profiles

LAYOUT:

Louery, Bonker, Wisc.

\$180

HEADLINE TYPE:

AUTHOR'S ALTERATIONS:

PHOTOSTATS:

3 at \$6.50

19.50

DELIVERY:

Fed Ex to Boston \$11.00

1 del. at \$8.50

19.50

SUBTOTAL:

\$219 -

TAX:

13.14

TOTAL:

\$232.14

TERMS: PAYMENT DUE UPON RECEIPT.

PAY THIS AMT ✓

3 0 0 4 0 0 2 4 5

check
154.76 = initial
77.38 = plus
77.38 = lowry
154.76

OK-10/3/88
 John Depp
 Larry Kohl/Marketing



S&S MAILING SERVICE

SERVING THE METROPOLITAN AREA SINCE 1948
 DIRECT MAIL SERVICES

5171 LAWRENCE PLACE
 HYATTSVILLE, MARYLAND 20781

779-3600

TO: Council for a Livable World
 100 Maryland Ave., NE
 Washington, DC 20002

INVOICE DATE 09-29-88

P.O. NUMBER

S & S JOB # 4298

TERMS: NET 30 DAYS

September Mailing

Quantity	Description	
18,135	Domestic 1st class by stamp @ .21	3,808.35
1,865	Domestic 1st class by stamp @ .25	466.25

000403000

7277

20,000 Fold, affix stamps, cheshire, insert, zip bundle, and mail 1,240.00

180.53
~~224.60~~
 100MY shad
 Kohl 290
 180.53 = 1/3

Total Postage 4,274.60

Total Service 1,240.00

Subtotal 5,514.60

Less Customer Advance - 5,000.00

Total Due 30 Days 514.60

CLW
 224.60
 44.07
 8/11
 180.53
 Larry



30 Cobble Hill Rd., Somerville, MA 02148 (617) 623-0000
 Toll-Free in MA 800-445-1380, Outside MA 800-288-1388

REMIT TO:

PO BOX 3871
 BOSTON, MA 02241

773530

Council for a Livable World
 20 Park Plaza (Statler Office Bldg.)
 Boston, Mass 02116

S & S Mailing
 5171 Lawrence Place
 Hyattsville, Maryland 20781

ORDER DATE	YOUR ORDER NO.	REQ. NO.	EST. SHIP. DATE	SHIP. METHOD	QUANTITY	UNIT PRICE	TOTAL	AMOUNT
1/13/87				Jerome Grossman	1		x	4/2/87
QUANTITY	PAPER	SIZE & STYLE & PRINTING				PRICE	AMOUNT	
265M	24 w. w. #10 spec poly outlook ptd left face black to copy offset Boston					15.73M	4,168.45	
255M	24 blue wove #7-3/4 official ptd face blk no code BRE to copy Boston					15.06M	3,840.30	
							8,008.75	

SEE REVERSE SIDE FOR TERMS AND CONDITIONS

TERMS NET

DUPLICATE INVOICE

PAY LAST AMOUNT IN THIS COLUMN

9 J U 4 0 3 0 0 2 4 7



To combat the menace
of nuclear war

Council for a Livable World

20 Park Plaza
Boston, Mass. 02116
Phone: (617) 542-2282

GEORGE RATHJENS
Chairman

JEROME S. WISNER
Honorary Chairman

JEROME GROSSMAN
President

ROSALIE ANDERS
Asst. Executive Director

100 Maryland Avenue, N.E.
Washington, D.C. 20002
Phone: (202) 543-4100

JOHN ISAACS
Legislative Director

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KOSTA TSIPIB
MIT

JEROME S. WISNER
MIT

HERBERT YORK
University of Ca.

Abbreviations For Identification Only

July 14, 1989

Bill Christofferson
Carrier, Christofferson & Assoc.
44 E. Mifflin St., suite 305
Madison, WI 53703

Dear Bill Christofferson:

Enclosed is an invoice for the balance due for the Kohl profiles as well as a copy of a chart explaining the expenses for the mailing.

I'm sorry for all the trouble this has put you to.

Let me know if you need additional information to clear up the matter.

Sincerely,

Rosalie Anders





INVOICE

To combat the menace
of nuclear war

**Council
for a
Livable
World**

20 Park Plaza
Boston, Mass. 02118
Phone: (617) 842-2282

GEORGE RATHJENS
Chairman
JEROME S. WISNER
Honorary Chairman
JEROME GROSSMAN
President
ROSALIE ANDERS
Asst. Executive Director

100 Maryland Avenue, N.E.
Washington, D.C. 20002
Phone: (202) 543-4100

JOHN ISAACS
Legislative Director

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Harvard University
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Johns Hopkins University
- JOHN KENNETH GALBRAITH
Harvard University
- JEROME GROSSMAN
Business Executive
- VERA KISTIAKOWSKY
MIT
- ADMIRAL JOHN M. LEE
U.S. Navy (Retired)
- MATTHEW NEBELSON
Harvard University
- GENE POKORNY
Cambridge Reports
- CHARLES PRICE
University of Pa.
- EDWARD PURCELL
Harvard University
- GEORGE RATHJENS
MIT
- ELI SAGAN
Writer
- JANE SHARP
Peace Research, SIPRI
- WILLIAM E. TARLOW
Business Executive
- KOSTA TSIPIB
MIT
- JEROME S. WISNER
MIT
- HERBERT YORK
University of Co.

Affiliations For Identification Only

July 14, 1989

Kohl share of September, 1988 mailing
extra candidate profiles

\$2970.16
565.10

3535.26

Kohl paid

3223.34

remainder due

311.92

Founded in 1962 by Leo Szilard



ALLOCATION OF EXPENSES FOR KOHL-LOWRY MAILING

EXPENSE	TOTAL COST	1/3	KOHL PAID	LOWRY INKIND REPORTED
S & S Mailing	5000.00	1666.67	1666.67	1666.66
S & S Mailing	514.60	171.53	290.00	180.53
Grimwoods	232.14	77.38	50.00	77.38
Mass. Envelope	615.80	205.27	200.00	200.00
Cantrell/Cutter	2547.93	849.31	616.67	1139.60
	<u>8910.47</u>	<u>2970.16</u>	<u>3023.34</u>	<u>3264.17</u>

additional profiles for Kohl----\$565.10

Kohl's share of mailing and profiles-----\$3535.25

Kohl paid----\$3023.34 plus \$200

EXHIBIT B.

90040300251

WHITEFIELD
PERMOTION FULL



To combat the menace
of nuclear war

Council for a Livable World

20 Park Plaza
Boston, Mass. 02116
Phone: (617) 542-2282

GEORGE RATHJENS
Chairman
JEROME B WIESNER
Honorary Chairman
JEROME GROSSMAN
President

ROSALIE ANDERS
Asst. Executive Director

100 Maryland Avenue, N.E.
Washington, D.C. 20002
Phone: (202) 543-4100

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ELIOT HUBBARD III
Business Executive

VERA KISTIAKOWSKY
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University of Pa

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MIT

ELI SAGAN
Writer

JANE SHARP
Peace Research, SIPRI

KOSTA TSIPIS
MIT

JEROME B WIESNER
MIT

HERBERT YORK
University of Ca

Affiliations For Identification Only

September 23, 1988

Dear Council supporter:

This is a political emergency.

Two very important Senate seats - in Wisconsin and Washington state - are up for grabs because the incumbents chose not to run for reelection.

Both states had late primaries - Wisconsin on September 13, Washington state on September 20.

In both states there is a classical hawk-dove confrontation.

In both states Council for a Livable World could not make pre-primary endorsements because all the candidates in the Democratic primaries were strongly committed to nuclear arms control.

In both states the winner of the Democratic primary has an empty campaign treasury with the general election only weeks away.

We endorse Mike Lowry for U.S. Senate in Washington state and Herb Kohl for U.S. Senate in Wisconsin.

The enclosed profiles explain our reasons and analyze the political situation in both states.

These contests are sure to be very close. We are convinced that our endorsed candidates can win if they can raise enough money to buy television spots for the last campaign weeks.

We urge you to make out your checks to these candidates with special generosity. This is an unusual situation and a genuine opportunity.

Sincerely,

Jerome Grossman
President



3 **How Does Giving Through Council for a Livable World Double My Political Clout?**

5 Since 1962 the Council has been the electoral arm of the peace movement . . . We combine your check
2 with thousands of contributions from our other supporters and present them to the candidates. You get
credit for your individual contribution, the peace movement gets credit, and our lobbying strength for
genuine arms control is increased.

3 **Why Should I Contribute to an Unfamiliar Candidate?**

0 Our research and interviews identify candidates who support nuclear disarmament . . . We back viable
4 challengers against incumbent hawks and deserving incumbents who are threatened by the hardline
right . . . Unless you have a particular preference, please make your contribution according to the
alphabetical arrangement below:

If your last name begins with:

A-G, check payable to COUNCIL FOR A
LIVABLE WORLD

H-O, check payable to MIKE LOWRY FOR
U.S. SENATE

P-Z, check payable to HERB KOHL FOR
U.S. SENATE

Please make checks payable **only** to the intended
recipient. If you make more than one contri-
bution, please write **separate** checks for each.

This solicitation is authorized by MIKE LOWRY FOR
U.S. SENATE COMMITTEE and HERB KOHL FOR
U.S. SENATE.

Occupation _____

Employer _____

(information required by federal law)

Contributions to the above are not deductible as charitable
contributions for federal income tax purposes

COUNCIL FOR A LIVABLE WORLD

20 Park Plaza
Boston, MA 02116

I enclose my contribution of \$30 \$50 \$100 \$250 Other _____

to COUNCIL FOR A LIVABLE WORLD

to MIKE LOWRY FOR U.S. SENATE

to HERB KOHL FOR U.S. SENATE

This solicitation is paid for by Council for a Livable World
and Herb Kohl for U.S. Senate

Please correct your mailing address

0103117

Council For A Livable World

BINDER COPY. DO NOT OPEN

20 Park plaza, suite 603

Boston, MA 02116

Please fold card and return in enclosed envelope



Mike Lowry of Washington

Democrat
Endorsed for U.S. Senate by
Council for a Livable World

Representative Mike Lowry faces a frantic six-week sprint to election day. He has just won a demanding Democratic primary victory in his second bid for the Senate. He will face former Senator Slade Gorton, who is trying for a comeback after an upset defeat two years ago.

Mike Lowry is one of the most aggressive, vocal and effective supporters of nuclear arms control in the U.S. House of Representatives. Lowry has a national reputation for his passion on the danger of nuclear weapons. His campaigns, his newsletters, and his speeches on Capitol Hill and in his home state have made arms control a central focus. In his first newsletter after President Reagan's March 1983 Star Wars speech, Lowry diagnosed the flaws in the President's fantasy. He has courageously opposed military projects that would provide jobs for the state of Washington, including the MX missile program and homeporting an aircraft carrier.

Lowry believes in the power of grassroots activity. He wrote in a July 1988 newsletter:

"There can be no doubt that the prospects for success in arms control are directly related to the work of thousands of grassroots arms control supporters, for only in response to their pressure did President Reagan take his first halting steps toward arms control."

In addition to his fiery speeches on the House floor, Lowry has a superb arms control voting record. He has strongly supported proposals for a mutual U.S.-Soviet nuclear freeze, a mutual nuclear testing moratorium, an end to anti-satellite weapons testing, the traditional interpretation of the ABM Treaty and the SALT II strategic arms ceilings. With his votes, speeches and amendments, he has opposed the MX missile, the Trident II missile, the B-1 bomber, the neutron bomb, Star Wars and chemical weapons. As a

member of the House Budget Committee, he has pressed for military spending restraint. He has received a 100 percent rating on the Council for a Livable World's House Nuclear Arms Race Index for the past three years. Lowry has consistently opposed U.S. military intervention in Nicaragua and supported sanctions on the repressive South African regime.

The Senate race is now between two candidates who have had their share of successes, but who each lost their most recent contests for the United States Senate. Mike Lowry ran a surprisingly strong race in the 1983 special Senate election after the death of Senator Henry Jackson. Early in the short campaign he seized the initiative against the moderate, very popular former governor of Washington, Dan Evans. The opinion polls were very close until the U.S. invasion of Grenada just before the special election swung sentiment behind Ronald Reagan and the Republican Party. Senator Evans won with 55 percent of the vote and has decided not to seek reelection for personal reasons.

Slade Gorton was defeated in 1986 in his first Senate reelection bid by Brock Adams. A series of missteps cost Gorton his strong early lead. He publicly flip-flopped on the nomination of federal judge Daniel Manion. Adams kept him on the defensive over the Department of Energy's decision to choose the state of Washington as a possible site for a nuclear waste dump. Gorton failed in his attempt to make Star Wars a winning issue in the closing weeks of the campaign.

After his 1986 loss, Gorton seemed to be through with politics and to disappear into the private sector. He changed his mind when the Republican Party could not find a strong candidate to run for the Senate seat. His problems from 1986 continue to haunt him: he worked with the Department of Energy on plans to convert the mothballed commercial nuclear reactor at Han-

ford to a nuclear weapons plant. He still suffers from a reputation for aloofness, arrogance and insensitivity. Those who oppose the weapons plant in Washington, he charged, are guilty of favoring "unilateral disarmament."

As Senator, Slade Gorton was a keen disappointment. Elected with a moderate image in 1980, he had a poor record on arms control and military budget issues. In 1985, for example, he voted for the MX missile, against a freeze on military spending, for anti-satellite weapons and for Star Wars nuclear programs. His position on chemical weapons production flip-flopped several times. Gorton did vote for U.S. compliance with SALT II, but refused to support a bilateral nuclear weapons freeze. Gorton received a 38 percent rating on the Council for a Livable World's Nuclear Arms Race Index in 1986, 25 percent in 1985 and 22 percent in 1984. On other matters Gorton voted against economic sanctions on South Africa and supported aid to the Contras in Nicaragua.

Mike Lowry has served five terms as U.S. Representative from Seattle. In the House of Representatives, he has a reputation for tireless work and outspoken advocacy on behalf of many progressive causes. His peers recognized his effectiveness by selecting him the current chairman of the prestigious Democratic Study Group, the leading organizing force for liberal Democrats, and head of the House leadership task force on

the homeless. Rumpled and rough-hewn, he is the antithesis of the modern, blow-dried, made-for-television candidate.

Mike Lowry fended off a tough primary challenge from the highly respected Representative Don Bonker. Lowry started the primary race ahead, and maintained that lead with an aggressive and grassroots-oriented campaign. However, on primary day he had nothing in the bank for the general election. In contrast, Slade Gorton has plenty of money and will be on television constantly through election day. Lowry needs a quick infusion of funds to match Gorton advertisement-for-advertisement.

Council for a Livable World is convinced that Lowry can defeat Gorton if he can raise enough money to be competitive. As Senator, Mike Lowry will immediately become one of our most important arms control leaders in a body desperately short of such leaders. His interest, drive and intellect will make him a major force in the Senate. Leadership is a precious commodity. If you agree, please make out your checks to:

MIKE LOWRY FOR U.S. SENATE

and mail to:

Council for a Livable World
20 Park Plaza
Boston, MA 02116

9 7 0 4 0 8 0 0 2 5 5





Herb Kohl of Wisconsin

Democrat
Endorsed for U.S. Senate by
Council for a Livable World

The United States Senate and the people of Wisconsin were stunned when Senator William Proxmire announced that he would not run for reelection in 1988. First elected in 1957, Proxmire has been a legendary hero who took on military contractors with flair and some success. He usually had a perfect voting record on nuclear arms control and disarmament. He will be missed.

While no one can really fill Proxmire's shoes, it is essential that his successor have a similar outlook on issues. This is the first Senate race in Wisconsin since 1957 without an incumbent seeking reelection. The open seat is up for grabs, and the conservative Republicans have an even chance to capture it. We must not let this happen.

In the September 13 Democratic primary, after a hard-fought campaign, Herb Kohl emerged the victor over a distinguished field. Kohl is a Wisconsin native and a graduate of the University of Wisconsin. Although he has been a political activist, Kohl has never run for political office before. However, his name is a household word in Wisconsin. Until 1979 he was president of the Kohl Corporation, operators of grocery and department stores throughout the state. When the Milwaukee Bucks professional basketball team appeared likely to leave Wisconsin, Kohl bought the team to make sure it stayed.

Kohl's political experience has been limited to two years as chair of the Democratic Party of Wisconsin. He says, "I'm not a professional politician. I'm a businessman and a citizen who cares deeply about this state and its people." Kohl is 53 years old, slight and soft-spoken, and the voters like his low-key approach.

Herb Kohl is forthright on issues. In his campaign literature and his speeches he says, "Arms control is not a political issue; it is a human issue. The arms race robs money from other needed programs and threatens our very existence. End-

ing it must be the highest priority of Wisconsin's next U.S. Senator. It certainly would be mine."

Kohl proposes the following steps to reduce nuclear forces:

Strategic Weapons

- Discontinue construction and deployment of the MX missile
- Abandon the single-warhead Midgetman missile program
- Cease appropriations for deployment of the Trident II (D-5) submarine
- Support legislation which prohibits spending on weapons systems inconsistent with the sublimits established by the SALT II Treaty, as long as the Soviets stay within these sublimits

Strategic Defenses

- Reduce funding for the Strategic Defense Initiative (SDI) to its pre-1983 levels, maintaining only basic research as a hedge against Soviet technological breakthrough
- Uphold the 1972 Anti-Ballistic Missile Treaty language which prohibits deployment of Star Wars missile systems
- Prohibit testing of anti-satellite (ASAT) missile systems
- Develop and seek ratification of a Strategic Arms Reduction Treaty which defines significant, mutually verifiable reductions in long-range nuclear forces

Intermediate Nuclear Forces

- Support the Intermediate-range Nuclear Forces (INF) Treaty which eliminates all ground-based nuclear missiles with ranges between 300 and 3500 miles
- Use the verification framework of the INF Treaty as a model for future negotiation of strategic nuclear force reductions

Nuclear Test Ban

- Work toward an immediate bilateral moratorium

- on all nuclear weapons tests
- Support bilateral ballistic-missile flight test ban treaty.

Long before she decided to run for office, Kohl supported ~~and~~ contributed to the Wisconsin Nuclear Freeze. He supports the Arias peace plan in Nicaragua ~~and~~ is opposed to military aid to the Contras, although he would vote for humanitarian aid.

The Republican nominee is State Senator Susan Engeleiter, a conservative professional politician and the minority leader in the State Senate. While she is nowhere ~~near~~ as specific on issues as Herb Kohl, what she ~~has~~ said indicates that her arms control votes ~~are~~ likely to be similar to conservative Wisconsin Republican incumbent Senator Robert Kasten. Kasten's voting record on the Council for a Livable World Index ranges from 0 to 25 per cent. Like Kasten, Engeleiter opposes cuts

in the military budget, supports Star Wars research and deployment, favors the production of chemical weapons and nerve gas, and opposes a moratorium on nuclear weapons testing. She is a firm supporter of the Reagan doctrine of peace through strength. She is for Contra aid, both military and non-military, and against imposing economic sanctions on South Africa.

Public opinion polls indicate that this important race will be very close. Council for a Livable World believes that Herb Kohl should be elected to continue the arms control tradition of William Proxmire. If you agree, please make out checks to:

HERB KOHL FOR U.S. SENATE

and mail to:

Council for a Livable World
20 Park Plaza
Boston, MA 02116

9 0 4 0 3 0 0 2 5 7





To combat the menace of nuclear war

Council for a Livable World

20 Park Plaza
Boston, Mass. 02116
Phone: (617) 542-2282

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Chairman
JEROME B. WIESNER
Honorary Chairman
JEROME GROSSMAN
President
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100 Maryland Avenue, N.E.
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U.S. Navy (Retired)
MATTHEW MESELSON
Harvard University
GENE POKORNY
Cambridge Reports
CHARLES PRICE
University of Pa.
EDWARD PURCELL
Harvard University
GEORGE RATHJENS
MIT
ELI SAGAN
Writer
JANE SHARP
Peace Research, SIPRI
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Business Executive
KOSTA TSIPIS
MIT
JEROME B. WIESNER
MIT
HERBERT YORK
University of Ca.

Affiliations For Identification Only

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

060 3496

89 JUL 20 AM 11:58

July 14, 1989

Re: MUR 2764

Danny L. McDonald, Chairman
Federal Election Commission
Washington, DC 20463

Dear Danny L. McDonald:

In response to your letter of July 5, 1989, the enclosed responses to your questions will show that we made an inadvertent error in the heat of the 1988 campaign amounting to \$311.92.

We do not intend to be represented by counsel in this matter at this time.

We are interested in pursuing pre-probable cause conciliation.

May we point out the following:

1. Herb Kohl for U.S. Senate paid in advance for his share of the solicitation mailing based on estimates of cost from our suppliers because he did not wish to accept PAC contributions. Lowry for U.S. Senate did not pay any solicitation costs because he accepted PAC contributions.
2. All expenses for the solicitation were reported to the FEC, in the report for September 1988 and the report for October 20 through November 28.
3. We divided mailing costs by thirds among the two candidates and Council for a Livable World. We estimated that the Council would get about a third of the contributions resulting from the mailing.

We have billed the Herb Kohl for U.S. Senate campaign for \$311.92, and we have amended our October 20 through November 28 report to correct the amount of our inkind contributions to the Lowry for U.S. Senate campaign.

Sincerely,

Rosalie Anders
Assistant Executive Director

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF THE DIRECTOR
89 JUL 20 PM 3:44

20040300258



Founded in 1962 by Leo Szilard



RE: MUR 2764

1. The solicitation on behalf of Kohl and Lowry cost \$8910.47. Rosalie Anders, assistant executive director of Council for a Livable World, has the information about the costs.

2. Disbursements made in connection with the solicitation:

S & S Mailing, 5171 Lawrence Place, Hyattsville, MD 20781

Two checks were sent to S & S Mailing to cover the postage costs for the solicitation--one from Herb Kohl for U.S. Senate for \$1666.67 and one from Council for a Livable World for \$3333.33. Both checks were written on September 15, 1988. The estimated postage cost was \$5000; the actual postage cost was \$4274.60. S & S Mailing applied the difference to the cost of folding the solicitation, stamping and putting labels on the envelopes, putting the solicitation in envelopes, putting the envelopes in zip-code ordered bundles and mailing. The cost for these services was \$1214. Deducting the overpayment for postage, the invoice from S & S was for \$514.60. Council for a Livable World paid \$224.60; Herb Kohl for U.S. Senate paid \$290. Herb Kohl for U.S. Senate paid in advance, based on an estimate, with a check dated September 15, 1989. Council for a Livable World paid on October 24, 1989.

Massachusetts Envelope Company, 30 Cobble Hill Rd., Somerville, MA 02143

Council for a Livable World ordered large quantities of envelopes from Massachusetts Envelope Company to cover a number of solicitations. The envelopes were paid for on May 12, 1987, by Council for a Livable World. At a cost of \$15.73/thousand for outside envelopes and \$15.06/thousand for business reply envelopes, the cost of envelopes for the solicitation was \$615.80. Herb Kohl for U.S. Senate paid us \$200 for envelopes, about a third of the cost.

Cantrell/Cutter, 499 S. Capitol St., SW, Washington, DC 20003

Cantrell/Cutter printed the mailing. The cost of the printing for the solicitation was \$2547.93. Herb Kohl for U.S. Senate paid \$816.67, based on an estimate, on September 15, 1989; Council for a Livable World paid \$1731.26 on October 24, 1989.

Grimwoods, 1228 G St., SE, Washington, DC 20003

Grimwoods did the typesetting for the solicitation. The total cost was \$232.14, of which Herb Kohl for U.S. Senate paid \$50, based on an estimate, on September 15, 1989. Council for a Livable World paid \$182.14 on October 24, 1989.

3. The basis for allocating the costs of the solicitation was to divide the costs in thirds, one third for Herb Kohl for U.S. Senate, one third for Mike Lowry for U.S. Senate, and one third for Council for a Livable World. In fact, Council for a Livable World made an error in paying the Cantrell/Cutter bill. The Council mistakenly included bills for other printing by

90040300259

Cantrell/Cutter in accounting for the cost of the solicitation. As a result, in its report for 10/20/88 through 11/28/88, the Council over-reported the amount of inkind contribution for printing to Mike Lowry for U.S. Senate.

One third of the cost of the mailing was \$2970.15. Additional candidate profiles for the Kohl campaign cost \$565.10. The additional \$200 that Herb Kohl for U.S. Senate paid the Council for expenses did not cover the entire cost of the extra profiles. Because we forgot to separate the cost of the profiles from the mailing cost, we did not pick this up. As a result, Council for a Livable World, by neglecting to charge the Kohl campaign enough to cover the cost of the printing, inadvertently made an error of \$311.92.

6. Rosalie Anders, assistant executive director of Council for a Livable World, who pays the Council's bills and prepares the FEC reports, has answered these questions.

Rosalie Anders

Rosalia Anders
Secretary
Comm. Expenses 8/15/94

9 0 0 4 0 3 0 0 2 6 0

ALLOCATION OF EXPENSES FOR KOHL-LOWRY MAILING

EXPENSE	TOTAL COST	1/3	KOHL PAID	LOWRY INKIND REPORTED
S & S Mailing	5000.00	1666.67	1666.67	1666.66
S & S Mailing	514.60	171.53	290.00	180.53
Grimwoods	232.14	77.38	50.00	77.38
Mass. Envelope	615.80	205.27	200.00	200.00
Cantrell/Cutter	2547.93	849.31	616.67	1139.60
	<u>8910.47</u>	<u>2970.16</u>	<u>3023.34</u>	<u>3264.17</u>

additional profiles for Kohl----\$565.10

Kohl's share of mailing and profiles----\$3535.25

Kohl paid----\$3023.34 plus \$200

5.

04-9/27/88 C96
John



Cantrell/Cutter Printing, Inc.



499 South Capitol St., S.W.
Suite 101
Washington, D.C. 20003
202-546-6332

TO

COUN. / LIVABLE WORLD
100 MARYLAND AVE.
WASHINGTON, DC 20002

INVOICE NO. 4212

AR00319

PURCHASE ORDER NO. NA		REQUISITIONED BY NA	TERMS 30 DAYS NET	JOB NO. 4212	DATE 9/26/88
ITEM	QUANTITY	DESCRIPTION		UNIT PRICE	TOTAL PRICE
	21,000	CONTRIBUTION CARD.			
		SUBTOTAL			335.44
		DC TAX.....			20.12
		TOTAL.....			355.56

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on 9/28/88 C96
John Szaa

Cantrell/Cutter Printing, Inc.



499 South Capitol St., S.W.
Suite 101
Washington, D.C. 20003
202-546-6332

TO

COUN. /LIVABLE WORLD
100 MARYLAND AVE.
WASHINGTON ,DC 20002

INVOICE NO. 4215

AR00319

PURCHASE ORDER NO. NA		REQUISITIONED BY NA	TERMS 30 DAYS NET	JOB NO. 4215	DATE 9/26/88
ITEM	QUANTITY	DESCRIPTION		UNIT PRICE	TOTAL PRICE
	21,000	LOWRY PROFILE (C-96).			
		SUBTOTAL			742.19
		DC TAX.....			44.53
		TOTAL.....			786.72

40800263

5.

9/29/88
John H. Haa

C9C

Contrell/Cutter Printing, Inc.



499 South Capitol St., S.W.
Suite 101
Washington, D.C. 20003
202-546-6332

TO

COUN./LIVABLE WORLD
100 MARYLAND AVE.
WASHINGTON, DC 20002

INVOICE NO. 4214

AR00319

PURCHASE ORDER NO. NA		REQUISITIONED BY JOHN	TERMS 30 DAYS NET	JOB NO. 4214	DATE 9/26/88
ITEM	QUANTITY	DESCRIPTION		UNIT PRICE	TOTAL PRICE
	36,000	KOHLE PROFILE (C-96)			
		SUBTOTAL			1275.31
		DC TAX.....			76.51
		TOTAL.....			1351.82

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Cantrell/Cutter Printing, Inc.



On 9/28/88 C96
Johnson
499 South Capitol St., S.W.
Suite 101
Washington, D.C. 20003
202-546-6332

TO
COUN. /LIVABLE WORLD
100 MARYLAND AVE.
WASHINGTON ,DC 20002

INVOICE NO. 4213

AR00319

PURCHASE ORDER NO. NA		REQUISITIONED BY NA	TERMS 30 DAYS NET	JOB NO. 4213	DATE 9/26/88
ITEM	QUANTITY	DESCRIPTION		UNIT PRICE	TOTAL PRICE
	21,000	GROSSMAN LETTER. (C-96).			
			SUBTOTAL		583.90
			DC TAX.....		35.03
			TOTAL.....		618.93

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5.
Grimwoods

PHOTOTYPESETTING • PASTEUP

OK
9/21/88
Jh [unclear]

NO.

DATE:

9/21/88

JOB NO:

PO NO:

1228 G STREET, S.E. • WASHINGTON, D.C. 20003 • 546-7205

TO: Council for a Lindbergh World

SUBJECT: 295 mailing - Sept. 88

PAGES:

PRICE PER PAGE:

TYPESETTING: 3 profiles

LAYOUT: Loney, Bonker, Wisc.

\$180

HEADLINE TYPE:

AUTHOR'S ALTERATIONS:

PHOTOSTATS: 3 at \$6.50

19.50

DELIVERY: Fed Ex to Boston \$11.00

1 del. at \$8.50

19.50

check
1st 76
2nd 38 = int
3rd 35 = 1/2
4th 77.35 = low
5th 76

SUBTOTAL: \$219 -

TAX: 13.14


TOTAL: \$232.14

TERMS: PAYMENT DUE UPON RECEIPT.

PAY THIS AMT ✓

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Massachusetts Envelope Company
 30 Cobble Hill Rd., Somerville, MA 02143 (617) 823-8000
 Toll-Free in MA 800-445-0900 Outside MA 800-368-1388

REMIT TO: 

P.O. BOX 241
BOSTON, MA 02111

No. 77353C

SOLD TO: Council for a Livable World
 20 Park Plaza (Statler Office Bldg.)
 Boston, Mass 02116

SHIP TO: S & S Mailing
 5171 Lawrence Place
 Hyattsville Maryland 20781

ORDER DATE	YOUR ORDER NO.	REQ. NO.	EST. SHIP. DATE	BUYER	SALESPERSON	#	PARTIAL	COMPLETE	INVOICE DATE
1/13/87				Jerome Grossman		1		X	4/2/87
QUANTITY	PAPER	SIZE & STYLE & PRINTING				PRICE	AMOUNT		
265M	24 w. w. #10 spec poly outlook ptd left face black to copy offset Boston					15.73M	4,168.45		
255M	24 blue wove #7-3/4 official ptd face blk no code BRE to copy Boston					15.06M	3,840.30		
							8,008.75		

SEE REVERSE SIDE FOR TERMS AND CONDITIONS TERMS NET DUPLICATE INVOICE PAY LAST AMOUNT IN THIS COLUMN

9 0 0 4 0 3 0 0 2 6 7

S&S MAILING SERVICE

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5171 LAWRENCE PLACE
HYATTSVILLE MARYLAND 20781

779-3600

S.
OK 10/3/88
Lavr. Kuhlman



TO: Council for a Livable World
100 Maryland Ave., NE
Washington, DC 20002

INVOICE DATE 09-29-88

P.O. NUMBER

S & S JOB # 4298

TERMS: NET 30 DAYS

September Mailing

8
6
2
18,135
1,865
0
0
3
0
0
4
0
0
0
0
20,000

Quantity	Description	
18,135	Domestic 1st class by stamp @ .21	3,808.35
1,865	Domestic 1st class by stamp @ .25	466.25

7277

20,000 Fold, affix stamps, cheshire, insert, zip bundle, and mail 1,240.00

Total Postage **4,274.60**

Total Service **1,240.00**

Subtotal **5,514.60**

Less Customer Advance - **5,000.00**

Total Due 30 Days **514.60**

~~18,135~~
~~224.60~~

44.07
224.60

COUNCIL FOR A LIVABLE WORLD
20 PARK PLAZA
BOSTON, MA 02116

EXPLANATION	AMOUNT
42.98	

6-133/110
BRANCH 08

727.7

PAY
AMOUNT
OF

Two hundred twenty-four & 60/100 DOLLARS

CHECK
AMOUNT

DATE	TO THE ORDER OF	DESCRIPTION	CHECK NUMBER
	S/S Mailing	MAIL SERVICE	727

UNITED STATES TRUST COMPANY
BOSTON, MASS.

James Brown

⑈007277⑈ ⑆011001331⑆ 889 2534505⑈

⑈0000022460⑈

90040300269

FOR DEPOSIT ONLY
S&S MAILING SERVICE
1-001-0545



10128-86 8239
0110-0001-5 4 530
08520055-88551484

1010278 102588 N.C.B.

32

ALL INFORMATION CONTAINED HEREIN IS UNCLASSIFIED

68957

824102024

90040300270

5.
COUNCIL FOR A LIVABLE WORLD
20 PARK PLAZA
BOSTON, MA 02116

EXPLANATION	AMOUNT

5-133/110
BRANCH 08

7278

PAY
AMOUNT
OF

Two Thousand Six hundred two ¹⁴/₁₀₀

DOLLARS

CHECK
AMOUNT

DATE	TO THE ORDER OF	DESCRIPTION	CHECK NUMBER
10/21/68	Centrell/Coxter	C 96	1218

UNITED STATES TRUST COMPANY
BOSTON, MASS.

Jane Brown

⑈007278⑈ ⑆011001331⑆ 889 2534505⑈

⑈0000260214⑈

90040300271



FOR DEPT
CENTRAL/COMM
OF CO
7
ONLY
C.

10-25-86
0110-0001-5 4 530
08-10226-1 82861485

1020265 102588 N.C.B.

1020265

90040600272

5.
COUNCIL FOR A LIVABLE WORLD
20 PARK PLAZA
BOSTON, MA 02118

EXPLANATION	AMOUNT

5-133/110
BRANCH 08

7276

PAY
AMOUNT
OF

One hundred eighty-two ⁴/₁₀₀ DOLLARS

0587

CHECK
AMOUNT

DATE	TO THE ORDER OF	DESCRIPTION	CHECK NUMBER

182

UNITED STATES TRUST COMPANY
BOSTON, MASS.

284150555 04 10-28-88 557 003709

Jane [Signature]

⑈007276⑈ ⑆011001331⑆ 889 2534505⑈

⑈0000018214⑈

20040300273

10-31-88
0110-0001-
00 10-31 581253003



Handwritten: 669
Handwritten: 699

SIGNET BANK/VA
051008778
284150888 10-28-88

Stamp box containing:
II
OCT 28 1988

21230866

Handwritten: 1233709
Handwritten: 606587

20040300274

5.

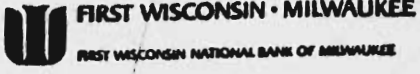
HERB KOHL FOR UNITED STATES SENATE, INC. 05-88

1600

9/15 19 88 $\frac{12-2}{750}$ 19

PAY TO THE ORDER OF Cantrell/Cutler Printing \$ 816⁶⁷/₁₀₀

Eight Hundred Sixteen and 67/100 DOLLARS



FOR [Signature]
⑈001600⑈ -⑈075000022⑈ 112755⑈096⑈

9004000215

HERB KOHL FOR UNITED STATES SENATE, INC. 05-88

1599

9/15 19 88 $\frac{12-2}{750}$ 19

PAY TO THE ORDER OF Greenwoods \$ 50⁰⁰/₁₀₀

Fifty and 00/100 DOLLARS



FOR [Signature]
⑈001599⑈ -⑈075000022⑈ 112755⑈096⑈

HERB KOHL FOR UNITED STATES SENATE, INC. 05-88

1597

9/15 19 88 $\frac{12-2}{750}$ 19

PAY TO THE ORDER OF S+S Printing \$ 290⁰⁰/₁₀₀

Two Hundred Ninety and 00/100 DOLLARS



FOR [Signature]
⑈001597⑈ -⑈075000022⑈ 112755⑈096⑈

HERB KOHL FOR UNITED STATES SENATE, INC. 05-88

1596

9/15 19 88 $\frac{12-2}{750}$ 19

PAY TO THE ORDER OF Council for a Livable World \$ 400⁰⁰/₁₀₀



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NECESSARY
IF MAILED
IN THE
UNITED STATES

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FIRST CLASS PERMIT NO. 482 BOSTON, MA

POSTAGE WILL BE PAID BY ADDRESSEE



COUNCIL FOR A LIVABLE WORLD
20 PARK PLAZA
BOSTON, MA 02116



combat the menace
of nuclear war

**Council
for a
Livable
World**

20 Park Plaza
Boston, MA 02116

-2

9 0 0 4 0 8 0 0 2 7 6



4.

September 23, 1988



To combat the menace
of nuclear war

Council for a Livable World

20 Park Plaza
Boston, Mass. 02116
Phone: (617) 542-2282

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Chairman

JEROME B. WIESNER
Honorary Chairman

JEROME GROSSMAN
President

ROSALIE ANDERS
Asst. Executive Director

100 Maryland Avenue, N.E.
Washington, D.C. 20002
Phone: (202) 543-4100

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Affiliations For Identification Only

Dear Council supporter:

This is a political emergency.

Two very important Senate seats - in Wisconsin and Washington state - are up for grabs because the incumbents chose not to run for reelection.

Both states had late primaries - Wisconsin on September 13, Washington state on September 20.

In both states there is a classical hawk-dove confrontation.

In both states Council for a Livable World could not make pre-primary endorsements because all the candidates in the Democratic primaries were strongly committed to nuclear arms control.

In both states the winner of the Democratic primary has an empty campaign treasury with the general election only weeks away.

We endorse Mike Lowry for U.S. Senate in Washington state and Herb Kohl for U.S. Senate in Wisconsin.

The enclosed profiles explain our reasons and analyze the political situation in both states.

These contests are sure to be very close. We are convinced that our endorsed candidates can win if they can raise enough money to buy television spots for the last campaign weeks.

We urge you to make out your checks to these candidates with special generosity. This is an unusual situation and a genuine opportunity.

Sincerely,

Jerome Grossman
President

2 0 0 4 0 0 0 0 2 7 7





Mike Lowry of Washington

Democrat
Endorsed for U.S. Senate by
Council for a Livable World

Representative Mike Lowry faces a frantic six-week sprint to election day. He has just won a demanding Democratic primary victory in his second bid for the Senate. He will face former Senator Slade Gorton, who is trying for a comeback after an upset defeat two years ago.

Mike Lowry is one of the most aggressive, vocal and effective supporters of nuclear arms control in the U.S. House of Representatives. Lowry has a national reputation for his passion on the danger of nuclear weapons. His campaigns, his newsletters, and his speeches on Capitol Hill and in his home state have made arms control a central focus. In his first newsletter after President Reagan's March 1983 Star Wars speech, Lowry diagnosed the flaws in the President's fantasy. He has courageously opposed military projects that would provide jobs for the state of Washington, including the MX missile program and homeporting an aircraft carrier.

Lowry believes in the power of grassroots activity. He wrote in a July 1988 newsletter:

"There can be no doubt that the prospects for success in arms control are directly related to the work of thousands of grassroots arms control supporters, for only in response to their pressure did President Reagan take his first halting steps toward arms control."

In addition to his fiery speeches on the House floor, Lowry has a superb arms control voting record. He has strongly supported proposals for a mutual U.S.-Soviet nuclear freeze, a mutual nuclear testing moratorium, an end to anti-satellite weapons testing, the traditional interpretation of the ABM Treaty and the SALT II strategic arms ceilings. With his votes, speeches and amendments, he has opposed the MX missile, the Trident II missile, the B-1 bomber, the neutron bomb, Star Wars and chemical weapons. As a

member of the House Budget Committee, he has pressed for military spending restraint. He has received a 100 percent rating on the Council for a Livable World's House Nuclear Arms Race Index for the past three years. Lowry has consistently opposed U.S. military intervention in Nicaragua and supported sanctions on the repressive South African regime.

The Senate race is now between two candidates who have had their share of successes, but who each lost their most recent contests for the United States Senate. Mike Lowry ran a surprisingly strong race in the 1983 special Senate election after the death of Senator Henry Jackson. Early in the short campaign he seized the initiative against the moderate, very popular former governor of Washington, Dan Evans. The opinion polls were very close until the U.S. invasion of Grenada just before the special election swung sentiment behind Ronald Reagan and the Republican Party. Senator Evans won with 55 percent of the vote and has decided not to seek reelection for personal reasons.

Slade Gorton was defeated in 1986 in his first Senate reelection bid by Brock Adams. A series of missteps cost Gorton his strong early lead. He publicly flip-flopped on the nomination of federal judge Daniel Manion. Adams kept him on the defensive over the Department of Energy's decision to choose the state of Washington as a possible site for a nuclear waste dump. Gorton failed in his attempt to make Star Wars a winning issue in the closing weeks of the campaign.

After his 1986 loss, Gorton seemed to be through with politics and to disappear into the private sector. He changed his mind when the Republican Party could not find a strong candidate to run for the Senate seat. His problems from 1986 continue to haunt him: he worked with the Department of Energy on plans to convert the mothballed commercial nuclear reactor at Han-

ford to a nuclear weapons plant. He still suffers from a reputation for aloofness, arrogance and insensitivity. Those who oppose the weapons plant in Washington, he charged, are guilty of favoring "unilateral disarmament."

As Senator, Slade Gorton was a keen disappointment. Elected with a moderate image in 1980, he had a poor record on arms control and military budget issues. In 1985, for example, he voted for the MX missile, against a freeze on military spending, for anti-satellite weapons and for Star Wars nuclear programs. His position on chemical weapons production flip-flopped several times. Gorton did vote for U.S. compliance with SALT II, but refused to support a bilateral nuclear weapons freeze. Gorton received a 38 percent rating on the Council for a Livable World's Nuclear Arms Race Index in 1986, 25 percent in 1985 and 22 percent in 1984. On other matters Gorton voted against economic sanctions on South Africa and supported aid to the Contras in Nicaragua.

Mike Lowry has served five terms as U.S. Representative from Seattle. In the House of Representatives, he has a reputation for tireless work and outspoken advocacy on behalf of many progressive causes. His peers recognized his effectiveness by selecting him the current chairman of the prestigious Democratic Study Group, the leading organizing force for liberal Democrats, and head of the House leadership task force on

the homeless. Rumpled and rough-hewn, he is the antithesis of the modern, blow-dried, made-for-television candidate.

Mike Lowry fended off a tough primary challenge from the highly respected Representative Don Bonker. Lowry started the primary race ahead, and maintained that lead with an aggressive and grassroots-oriented campaign. However, on primary day he had nothing in the bank for the general election. In contrast, Slade Gorton has plenty of money and will be on television constantly through election day. Lowry needs a quick infusion of funds to match Gorton advertisement-for-advertisement.

Council for a Livable World is convinced that Lowry can defeat Gorton if he can raise enough money to be competitive. As Senator, Mike Lowry will immediately become one of our most important arms control leaders in a body desperately short of such leaders. His interest, drive and intellect will make him a major force in the Senate. Leadership is a precious commodity. If you agree, please make out your checks to:

MIKE LOWRY FOR U.S. SENATE

and mail to:
Council for a Livable World
20 Park Plaza
Boston, MA 02116

9 7 0 4 0 8 0 0 2 7 9





Herb Kohl of Wisconsin

Democrat
Endorsed for U.S. Senate by
Council for a Livable World

The United States Senate and the people of Wisconsin were stunned when Senator William Proxmire announced that he would not run for reelection in 1988. First elected in 1957, Proxmire has been a legendary hero who took on military contractors with flair and some success. He usually had a perfect voting record on nuclear arms control and disarmament. He will be missed.

While no one can really fill Proxmire's shoes, it is essential that his successor have a similar outlook on issues. This is the first Senate race in Wisconsin since 1957 without an incumbent seeking reelection. The open seat is up for grabs, and the conservative Republicans have an even chance to capture it. We must not let this happen.

In the September 13 Democratic primary, after a hard-fought campaign, Herb Kohl emerged the victor over a distinguished field. Kohl is a Wisconsin native and a graduate of the University of Wisconsin. Although he has been a political activist, Kohl has never run for political office before. However, his name is a household word in Wisconsin. Until 1979 he was president of the Kohl Corporation, operators of grocery and department stores throughout the state. When the Milwaukee Bucks professional basketball team appeared likely to leave Wisconsin, Kohl bought the team to make sure it stayed.

Kohl's political experience has been limited to two years as chair of the Democratic Party of Wisconsin. He says, "I'm not a professional politician. I'm a businessman and a citizen who cares deeply about this state and its people." Kohl is 53 years old, slight and soft-spoken, and the voters like his low-key approach.

Herb Kohl is forthright on issues. In his campaign literature and his speeches he says, "Arms control is not a political issue; it is a human issue. The arms race robs money from other needed programs and threatens our very existence. End-

ing it must be the highest priority of Wisconsin's next U.S. Senator. It certainly would be mine."

Kohl proposes the following steps to reduce nuclear forces:

Strategic Weapons

- Discontinue construction and deployment of the MX missile
- Abandon the single-warhead Midgetman missile program
- Cease appropriations for deployment of the Trident II (D-5) submarine
- Support legislation which prohibits spending on weapons systems inconsistent with the sublimits established by the SALT II Treaty, as long as the Soviets stay within these sublimits

Strategic Defenses

- Reduce funding for the Strategic Defense Initiative (SDI) to its pre-1983 levels, maintaining only basic research as a hedge against Soviet technological breakthrough
- Uphold the 1972 Anti-Ballistic Missile Treaty language which prohibits deployment of Star Wars missile systems
- Prohibit testing of anti-satellite (ASAT) missile systems
- Develop and seek ratification of a Strategic Arms Reduction Treaty which defines significant, mutually verifiable reductions in long-range nuclear forces

Intermediate Nuclear Forces

- Support the Intermediate-range Nuclear Forces (INF) Treaty which eliminates all ground-based nuclear missiles with ranges between 300 and 3500 miles
- Use the verification framework of the INF Treaty as a model for future negotiation of strategic nuclear force reductions

Nuclear Test Ban

- Work toward an immediate bilateral moratorium

- on all nuclear weapons tests
- Support a bilateral ballistic-missile flight test ban treaty.

Long before he decided to run for office, Kohl supported and contributed to the Wisconsin Nuclear Freeze. He supports the Arias peace plan in Nicaragua and is opposed to military aid to the Contras, although he would vote for humanitarian aid.

The Republican nominee is State Senator Susan Engeleiter, a conservative professional politician and the minority leader in the State Senate. While she is nowhere near as specific on issues as Herb Kohl, what she has said indicates that her arms control votes are likely to be similar to conservative Wisconsin Republican incumbent Senator Robert Kasten. Kasten's voting record on the Council for a Livable World Index ranges from 0 to 25 per cent. Like Kasten, Engeleiter opposes cuts

in the military budget, supports Star Wars research and deployment, favors the production of chemical weapons and nerve gas, and opposes a moratorium on nuclear weapons testing. She is a firm supporter of the Reagan doctrine of peace through strength. She is for Contra aid, both military and non-military, and against imposing economic sanctions on South Africa.

Public opinion polls indicate that this important race will be very close. Council for a Livable World believes that Herb Kohl should be elected to continue the arms control tradition of William Proxmire. If you agree, please make out checks to:

HERB KOHL FOR U.S. SENATE

and mail to:
Council for a Livable World
20 Park Plaza
Boston, MA 02116

93040300281



How Does Giving Through Council for a Livable World Double My Political Clout?

Since 1962 the Council has been the electoral arm of the peace movement . . . We combine your check with thousands of contributions from our other supporters and present them to the candidates. You get credit for your individual contribution, the peace movement gets credit, and our lobbying strength for genuine arms control is increased.

Why Should I Contribute to an Unfamiliar Candidate?

Our research and interviews identify candidates who support nuclear disarmament . . . We back viable challengers against incumbent hawks and deserving incumbents who are threatened by the hardline right . . . Unless you have a particular preference, please make your contribution according to the alphabetical arrangement below:

If your last name begins with:
A-G, check payable to COUNCIL FOR A LIVABLE WORLD
H-O, check payable to MIKE LOWRY FOR U.S. SENATE
P-Z, check payable to HERB KOHL FOR U.S. SENATE

Please make checks payable **only** to the intended recipient. If you make more than one contribution, please write **separate** checks for each.

This solicitation is authorized by MIKE LOWRY FOR U.S. SENATE COMMITTEE and HERB KOHL FOR U.S. SENATE

Occupation _____
Employer _____
(information required by federal law)

Contributions to the above are not deductible as charitable contributions for federal income tax purposes.

COUNCIL FOR A LIVABLE WORLD

20 Park Plaza
Boston, MA 02116

Please use my contribution of \$30 \$50 \$100 \$250 Other _____
to COUNCIL FOR A LIVABLE WORLD
to MIKE LOWRY FOR U.S. SENATE
to HERB KOHL FOR U.S. SENATE

This solicitation is paid for by Council for a Livable World and Herb Kohl for U.S. Senate.

Please correct your mailing address.

0103117
Council For A Livable World
BINDER COPY DO NOT OPEN
20 Park Plaza, Suite 603
Boston, MA 02116

90040300232

Please fold card and return in envelope.

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

(Summary Page)

USE FEC MAILING LABEL OR TYPE OR PRINT

1. NAME OF COMMITTEE (in full) <u>Council for a Livable World</u>	2. FEC IDENTIFICATION NUMBER <u>C0029165</u>
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported <u>20 Park Plaza</u>	3. <input type="checkbox"/> This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (date).
CITY, STATE and ZIP CODE <u>Boston, MA 02116</u>	

4. TYPE OF REPORT

- (a) April 15 Quarterly Report
- July 15 Quarterly Report
- October 15 Quarterly Report
- January 31 Year End Report
- July 31 Mid Year Report (Non-election Year Only)
- Termination Report
- Monthly Report Due On:
- February 20 June 20 October 20
- March 20 July 20 November 20
- April 20 August 20 December 20
- May 20 September 20 January 31
- Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____
- Thirtieth day report following the General Election on 11/8/88 in the State of _____
- (b) Is this Report an Amendment? YES NO

SUMMARY

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period <u>10/20/88</u> through <u>11/28/88</u>		
6. (a) Cash on Hand January 1, 19 <u>88</u>		\$ 111,828.17
(b) Cash on Hand at Beginning of Reporting Period	\$ 117,777.20	
(c) Total Receipts (from Line 18)	\$ 62,631.87	\$ 480,179.21
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 180,409.07	\$ 592,007.38
7. Total Disbursements (from Line 28)	\$ 62,768.52	\$ 479,366.83
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 112,640.55	\$ 112,640.55
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	\$	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-376-3120
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	\$	

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

Type or Print Name of Treasurer <u>Jerome Grossman</u>	
Signature of Treasurer <u>Jerome Grossman</u>	Date <u>7/17/89</u>

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

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FEC FORM 3X

(revised 4/87)

20040300283

DETAILED SUMMARY PAGE

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

Name of Committee (in full) **Council for a Livable World** Report Covering the Period From: **10/20/88** To: **11/28/88**

I. RECEIPTS

	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date	
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees			
(i) Itemized (use Schedule A)	22,466.00	130,465.97	11(a)(i)
(ii) Unitemized	36,490.16	316,144.23	11(a)(ii)
(iii) Total of contributions from individuals	58,956.16	446,610.20	11(a)(iii)
(b) Political Party Committees			11(b)
(c) Other Political Committees (such as PACs)			11(c)
(d) TOTAL CONTRIBUTIONS (add 11(a)(iii), (b), and (c))	58,956.16	446,610.20	11(d)

12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES 12

13. ALL LOANS RECEIVED 13

14. LOAN REPAYMENTS RECEIVED 14

15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.) 15

16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES 16

17. OTHER RECEIPTS (Dividends, Interest, etc.) 17

18. TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17) 18

II. DISBURSEMENTS

19. OPERATING EXPENDITURES 19

20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES 20

21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES 21

22. INDEPENDENT EXPENDITURES (use Schedule E) 22

23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (use Schedule F) 23

24. LOAN REPAYMENTS MADE 24

25. LOANS MADE 25

26. REFUNDS OF CONTRIBUTIONS TO:

 (a) Individuals/Persons Other Than Political Committees 26(a)

 (b) Political Party Committees 26(b)

 (c) Other Political Committees (such as PACs) 26(c)

 (d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c)) 26(d)

27. OTHER DISBURSEMENTS 27

28. TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27) 28

III. NET CONTRIBUTIONS/OPERATING EXPENDITURES

29. TOTAL CONTRIBUTIONS (other than loans) (from Line 11(d)) 29

30. TOTAL CONTRIBUTION REFUNDS (from Line 26(d)) 30

31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from 29) 31

32. TOTAL OPERATING EXPENDITURES (from Line 19) 32

33. OFFSETS TO OPERATING EXPENDITURES (from Line 15) 33

34. NET OPERATING EXPENDITURES (subtract Line 33 from 32) 34

3040300234

SCHEDULE A

ITEMIZED RECEIPTS

Use this schedule for each category of the Detailed Summary Page

PAGE **1** OF
FOR LINE NUMBER **15**

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NAME OF COMMITTEE (in Full)

Council for a Livable World

30040300285

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Names in the News 530 Bush St. San Francisco, CA 94111 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) mail list rent	Occupation: Appropriate Year to Date: \$	10/23/88	\$2490.28
D. Ashley Brown III 1500 Locust St. Philadelphia, PA 19102 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) literature payment	Name of Employer: Occupation: Appropriate Year to Date: \$	10/23/88	7.50
E.R. Marshall 6194 Birch Row Drive East Lansing, MI 48823 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) literature payment	Name of Employer: Occupation: Appropriate Year to Date: \$	10/23/88	5.00
Barbara Katt Rte. 3, # 726 Pelican Rapids, MN 56572 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) literature payment	Name of Employer: Occupation: Appropriate Year to Date: \$	10/23/88	15.00
Suzanne Kennedy 2335 Unity Ave N Golden Valley, MN 55422 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) literature payment	Name of Employer: Occupation: Appropriate Year to Date: \$	10/23/88	25.00
Mrs. Jerry Newsom 10401 Prosperity Farms Rd. Palm Beach Gardens, FL 33410 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) literature payment	Name of Employer: Occupation: Appropriate Year to Date: \$	10/23/88	2.00
Louise E. Hoffman 519 Stanwich Rd. Greenwich, CT 06831 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) literature payment	Name of Employer: Occupation: Appropriate Year to Date: \$	10/23/88	3.42

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only)

SCHEDULE A

ITEMIZED RECEIPTS

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

PAGE 2 OF 6
FOR LINE NUMBER 15

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NAME OF COMMITTEE (in Full)

Council for a Livable World

90040300236

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Dr. Robert Gerard Westwood Mediacal Plaza 10921 Wishire Blvd, L.A., CA 90024		10/23/88	10.00
Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) literature payment			
Appropriate Year to Date: \$			
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)			
Appropriate Year to Date: \$			
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)			
Appropriate Year to Date: \$			
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)			
Appropriate Year to Date: \$			
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)			
Appropriate Year to Date: \$			
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)			
Appropriate Year to Date: \$			
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)			
Appropriate Year to Date: \$			

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only)

2558.20

SCHEDULE A

ITEMIZED RECEIPTS

(See instructions for the category of the Detailed Summary Page)

PAGE 1 OF 1
FOR LINE NUMBER 17

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NAME OF COMMITTEE (in Full)

Council for a Livable World

20040300237

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
US Trust 30 Court St. Boston, MA 02108 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify) interest	_____ Occupation _____ Aggregate Year to Date \$ _____	11/1/88	1117.51
B. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) _____	Name of Employer _____ Occupation _____ Aggregate Year to Date \$ _____	Date (month, day, year) _____	Amount of Each Receipt this Period _____
C. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) _____	Name of Employer _____ Occupation _____ Aggregate Year to Date \$ _____	Date (month, day, year) _____	Amount of Each Receipt this Period _____
D. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) _____	Name of Employer _____ Occupation _____ Aggregate Year to Date \$ _____	Date (month, day, year) _____	Amount of Each Receipt this Period _____
E. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) _____	Name of Employer _____ Occupation _____ Aggregate Year to Date \$ _____	Date (month, day, year) _____	Amount of Each Receipt this Period _____
F. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) _____	Name of Employer _____ Occupation _____ Aggregate Year to Date \$ _____	Date (month, day, year) _____	Amount of Each Receipt this Period _____
G. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) _____	Name of Employer _____ Occupation _____ Aggregate Year to Date \$ _____	Date (month, day, year) _____	Amount of Each Receipt this Period _____

SUBTOTAL of Receipts This Page (optional)	
TOTAL This Period (last page this line number only)	1117.51

SCHEDULE B

ITEMIZED DISBURSEMENTS

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

PAGE 1 OF 8

FOR LINE NUMBER 19

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NAME OF COMMITTEE (in Full)

Council for a Livable World

3
3
2
0
0
0
3
4
0
3
0
0
0
3
3
3

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
petty cash	office supplies, mail, lunches, travel	11/1/88	\$200.00
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General	11/15/88	200.00
	<input type="checkbox"/> Other (specify)	11/22/88	70.00
B. Full Name, Mailing Address and ZIP Code Andrew Siegal Council for a Livable World 100 Maryland Ave., NE Washington, DC 20002	Purpose of Disbursement reimbursement for xeroxing briefing book	Date (month, day, year) 11/14/88	Amount of Each Disbursement This Period \$487.20
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General		
	<input type="checkbox"/> Other (specify)		
C. Full Name, Mailing Address and ZIP Code D.C. DOES 500 C Street, NW Washington, DC 20001	Purpose of Disbursement DC unemployment tax	Date (month, day, year) 10/20/88	Amount of Each Disbursement This Period \$175.50
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General		
	<input type="checkbox"/> Other (specify)		
D. Full Name, Mailing Address and ZIP Code US Trust Company 30 Court Street Boston, MA 02108	Purpose of Disbursement FUT	Date (month, day, year) 10/20/88	Amount of Each Disbursement This Period \$61.29
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General		
	<input type="checkbox"/> Other (specify)		
E. Full Name, Mailing Address and ZIP Code Mass. Division Emp. Security Government Center Boston, MA 02114	Purpose of Disbursement MUT	Date (month, day, year) 10/20/88	Amount of Each Disbursement This Period \$183.00
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General		
	<input type="checkbox"/> Other (specify)		
F. Full Name, Mailing Address and ZIP Code John Isaacs 100 Maryland Ave, NE Washington, DC 20002	Purpose of Disbursement dependence assistance allowance	Date (month, day, year) 10/30/88	Amount of Each Disbursement This Period \$200.00
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General		
	<input type="checkbox"/> Other (specify)		
G. Full Name, Mailing Address and ZIP Code Sarah Barth (same address as above)	Purpose of Disbursement salary	Date (month, day, year) 10/30/88	Amount of Each Disbursement This Period \$412.79
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General	11/15/88	\$412.79
	<input type="checkbox"/> Other (specify)	11/20/88	\$412.79
H. Full Name, Mailing Address and ZIP Code John Isaacs (same address)	Purpose of Disbursement salary	Date (month, day, year) 10/30/88	Amount of Each Disbursement This Period \$632.13
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General	11/15/88	\$632.13
	<input type="checkbox"/> Other (specify)	11/20/88	\$632.13
I. Full Name, Mailing Address and ZIP Code Sarah Barth (same address)	Purpose of Disbursement health insurance	Date (month, day, year) 11/15/88	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General		
	<input type="checkbox"/> Other (specify)		

SUBTOTAL of Disbursements This Page (optional)	3666.82
TOTAL This Period (last page this line number only)	

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NAME OF COMMITTEE (in Full)

Council For A Livable World

40000232

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Rosalie Anders 20 Park Plaza, Suite 603 Boston, MA 02116	salary Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/30/88 11/15/88	\$244.56 \$244.56
B. Full Name, Mailing Address and ZIP Code Allen Joslin (same address as above)	salary Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/30/88 11/15/88	\$537.50 \$537.50
C. Full Name, Mailing Address and ZIP Code Paul Anders (same address as above)	salary Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/25/88 11/15/88	\$505.74 \$505.74
D. Full Name, Mailing Address and ZIP Code Aimee Close (same address as above)	salary Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/30/88 11/15/88	\$261.08 \$261.08
E. Full Name, Mailing Address and ZIP Code Jerome Grossman (same address as above)	salary Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/30/88 11/15/88	\$766.94 \$766.94
F. Full Name, Mailing Address and ZIP Code MCI Telecommunications 1100 King St. A1-3CC Ryebrook, NY 10573	Boston long-dist. phone Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	11/14/88	\$35.76
G. Full Name, Mailing Address and ZIP Code Diamond Office Supplies PO Box 189 Merrifield, VA 22116	office supplies Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	11/14/88	\$66.50
H. Full Name, Mailing Address and ZIP Code Federal Express Corp. PO Box 727 Memphis, TN 38194	delivery service Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	11/14/88 10/20/88	\$339.00 \$87.50
I. Full Name, Mailing Address and ZIP Code SIS, Inc. 90 Canal Street Boston, MA 02114	computer services Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	11/15/88 10/20/88	\$1069.33 \$1240.06

SUBTOTAL of Disbursements This Page (optional)

7469.79

TOTAL This Period (last page this line number only)

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use this schedule(s) for a summary of the Detailed Summary Page

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NAME OF COMMITTEE (in Full)
Council For A Livable World

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
American Express PO Box 13764 Phoenix, AZ 85002	travel & expenses Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	11/15/88	\$433.69
B. Full Name, Mailing Address and ZIP Code Grimwoods 1228 G. Street, SE Washington, DC 20003	typesetting Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	11/15/88 10/20/88	\$124.00 \$148.40 104.76
C. Full Name, Mailing Address and ZIP Code United Methodist Church Board of Church and Society 100 Maryland Ave, NE Washington, DC 20002	photocopying and mailing Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	11/15/88 10/20/88	\$171.13 \$104.76
D. Full Name, Mailing Address and ZIP Code TRW 8325-E Patuxent Range Road Jessup, MD 20794	maintenance DC computer Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	11/15/88	\$177.00
E. Full Name, Mailing Address and ZIP Code Cable & Wirelsee Communication 1920 Aline Ave. Vienna, VA 22180	DC phone Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/20/88 10/20/88	\$245.75 \$15.46
F. Full Name, Mailing Address and ZIP Code AT & T 1 Monarch Drive Quincy, MA 02171	phone maintenance Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/20/88 10/20/88	\$30.40 \$31.27
G. Full Name, Mailing Address and ZIP Code AT & T (same address)	phone lease Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/20/88 10/20/88	\$109.56 \$85.00
H. Full Name, Mailing Address and ZIP Code N.E. Telephone 185 Franklin St. Boston, MA 02107	Boston phone Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/20/88 11/10/88	\$84.21 \$74.46
I. Full Name, Mailing Address and ZIP Code New England Newsclip 5 Auburn Street Framingham, MA 01701	clipping service Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/20/88	\$205.73

SUBTOTAL of Disbursements This Page (optional)

2040.82

TOTAL This Period (last page this line number only)

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use (circles) for each category of the Detailed Summary Page

PAGE 4 OF 8
FOR LINE NUMBER 19

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NAME OF COMMITTEE (in Full)

Council For A Livable World

9904030029

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Harvard Community Health Ctr. 1 Fenway Plaza Boston, MA 02215	health insurance Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	11/15/88	\$151.20
B. Full Name, Mailing Address and ZIP Code Share Systems, Inc. 126 Rogers Street Cambridge, MA 02142	telemarketing Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	11/15/88	\$1973.33
C. Full Name, Mailing Address and ZIP Code Business Equipment Depot, Inc. 49 Dragon Court Woburn, MA 01801	copier supplies Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	11/15/88	\$67.00
D. Full Name, Mailing Address and ZIP Code Metropolitan Delivery Service 2327 Champlain St, NW Washington, DC 20009	delivery service Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	11/15/88 10/20/88	\$31.50 \$88.83
E. Full Name, Mailing Address and ZIP Code Pitney Bowes 6100 Lincolnia Road Alexandria, VA 22312-2705	DC meter Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	11/15/88	\$24.38
F. Full Name, Mailing Address and ZIP Code Massachusetts Envelope Co. 20 Cobble Hill Road Somerville, MA 02143	envelopes Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	11/15/88	\$1725.18
G. Full Name, Mailing Address and ZIP Code Postal Instant Press 4 Somerset St. Boston, MA 02108	[illegible] Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	11/15/88	\$115.00
H. Full Name, Mailing Address and ZIP Code S & S Mailing Service 5171 Lawrence Place Hyattsville, MD 20781	mailing Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	11/23/88 10/20/88	\$11,690.00 \$44.07
I. Full Name, Mailing Address and ZIP Code IBM PO Box 417 Philadelphia, PA 19105	typewriter maintenance Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	11/23/88	\$46.34

SUBTOTAL of Disbursements This Page (optional)

16,350.83

TOTAL This Period (last page this line number only)

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use this schedule for each category of the Detailed Summary Page

PAGE 5 OF 8
FOR LINE NUMBER 19

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NAME OF COMMITTEE (In Full)

Council For A Livable World

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
U.S. Trust Company 30 Court Street Boston, MA 02108	FICA/FWT- Oct. Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	11/1/88	\$2265.60 -
B. Full Name, Mailing Address and ZIP Code Commonwealth of Massachusetts PO Box 7004 Boston, MA 02204	Purpose of Disbursement MA w/h tax-Oct Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	11/1/88	\$229.56 .
C. Full Name, Mailing Address and ZIP Code D.C. Treasurer PO Box 39128 Washington, DC 20016	Purpose of Disbursement DC w/h tax-Oct. Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	11/1/88	\$157.60 .
D. Full Name, Mailing Address and ZIP Code W.A. Wilde 200 Summer St. Holliston, MA 01746	Purpose of Disbursement mailing postage Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	11/10/88 11/7/88	\$2100.00 . \$6250.00 .
E. Full Name, Mailing Address and ZIP Code Cable & Wireless Communication 1920 Aline Avenue Vienna, VA 22180	Purpose of Disbursement DC long dist. phone Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	11/9/88	\$88.49 .
F. Full Name, Mailing Address and ZIP Code IMS Leasing, Inc. 8 Brook St. Shelton, CT 06484	Purpose of Disbursement lease Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	11/10/88	\$34.98 .
G. Full Name, Mailing Address and ZIP Code Cantrell/Cutter 499 So. Capitol Street, SW Suite 402 Washington, DC 20003	Purpose of Disbursement printing Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/20/88 10/20/88	\$1752.83 . \$1876.69 .
H. Full Name, Mailing Address and ZIP Code Postal Instant Press 4 Somerset St Boston, MA 02108	Purpose of Disbursement printing Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/20/88	\$857.00 .
I. Full Name, Mailing Address and ZIP Code MCI Telecommunications 1100 King St. Al-3CC Ryebrook, NY 10573	Purpose of Disbursement Boston long dist. phone Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/20/88	\$102.71 .

SUBTOTAL of Disbursements This Page (optional)	15,425.17
TOTAL This Period (last page this line number only)	

SCHEDULE B

ITEMIZED DISBURSEMENTS

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

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NAME OF COMMITTEE (in Full)

Council For A Livable World

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Poulson Office Products 236 Brighton Ave Boston, MA 02134	office supplies Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/20/88	\$18.23 •
B. Full Name, Mailing Address and ZIP Code Allen Joslin 20 Park Plaza, Suite 603 Boston, MA 02116	petty cash Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/20/88	\$200.00 • \$100 00 •
C. Full Name, Mailing Address and ZIP Code Postmaster, Boston Permit Fee Window GMF Boston, MA 02205	meter refill Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/21/88	\$500.00 •
D. Full Name, Mailing Address and ZIP Code John Isaacs 100 Maryland Ave, NE Washington, DC 20002	reimbursement for travel Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/24/88	\$325.00 •
E. Full Name, Mailing Address and ZIP Code C & P Telephone PO Box 2123 Washington, DC 20003	DC phone Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/25/88	\$83.98 •
F. Full Name, Mailing Address and ZIP Code Share Systems, Inc. 126 Rogers Street Cambridge, MA 02142	telemarketing Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/25/88	\$1297.60 •
G. Full Name, Mailing Address and ZIP Code IMS Leasing, Inc. 8 Brook St Shelton, CT 06484	scale lease Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/20/88	\$49.95 •
H. Full Name, Mailing Address and ZIP Code Cloister Spring Water, CO 1060 S. State St Ephrate, PA 17522	water Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/20/88	\$11.13 •
I. Full Name, Mailing Address and ZIP Code Poland Spring 1500 Shawsheen St. Tewksbury, MA 01876	water Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/20/88	\$46.45 •

SUBTOTAL of Disbursements This Page (optional)

2632.34

TOTAL This Period (last page this line number only)

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedule(s) for each page of the Detailed Disbursement Page

PAGE 7 OF 8
FOR LINE NUMBER 19

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NAME OF COMMITTEE (in Full)

Council For A Livable World

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
American Express PO Box 13764 Phoenix, AZ 85002	travel and expenses Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/20/88	\$90.15 •
B. Full Name, Mailing Address and ZIP Code PeaceNet 3228 Sacramento Street San Francisco, CA 94115	subscription Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/20/88	\$85.16 •
C. Full Name, Mailing Address and ZIP Code Harvard Community Health Ctr. 1 Fenway Plaza Boston, MA 02215	health insurance Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/20/88 10/20/88	\$334.56 • \$151.20 •
D. Full Name, Mailing Address and ZIP Code New York Times Sales PO Box 37292 Washington, DC 20013	subscription Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/20/88	\$39.00 •
E. Full Name, Mailing Address and ZIP Code Jerome Grossman 20 Park Plaza, Suite 603 Boston, MA 02116	reimbursement for travel Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/20/88	\$87.90 •
F. Full Name, Mailing Address and ZIP Code Business Equipment Depot, Inc. 49 Dragon Court Woburn, MA 01801	paper Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/20/88	\$63.25 •
G. Full Name, Mailing Address and ZIP Code Board of Church & Society United Methodist Church 100 Maryland Ave, NE Washington, DC 20002	photocopying & mailing Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/20/88	\$64.38 •
H. Full Name, Mailing Address and ZIP Code T. Talbott Bond Co. 7140 Windsor Blvd. Baltimore, MD 21207	paper Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/20/88	\$13.08 •
I. Full Name, Mailing Address and ZIP Code Postmaster, Boston Permit Fee Window GMF Boston, MA 02205	BRM account Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/20/88	\$800.00 •

SUBTOTAL of Disbursements This Page (optional)

1728.68

TOTAL This Period (last page this line number only)

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use this schedule to
for category of the
Detailed Summary Page

PAGE 8 OF 8
FOR LINE NUMBER

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NAME OF COMMITTEE (in Full)

Council For A Livable World

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Laventhol and Horwath 2 Center Plaza, 6th Floor Boston, MA 02108	accounting Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/20/88	\$2805.00
B. Full Name, Mailing Address and ZIP Code Quill Corp. 100 S Schelter Road PO Box 4700 Lincolnshire, IL 60197	computer supplies Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/20/88	\$38.67
C. Full Name, Mailing Address and ZIP Code Cantrell/Cutter 499 So. Capitol St., SW Suite 402 Washington, DC 20003	printing Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/20/88 10/20/88	\$782.41 \$1055.97
D. Full Name, Mailing Address and ZIP Code Diamond Office Supplies PO Box 189 Merrifield, VA 22116	office supplies Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/20/88	\$115.56
E. Full Name, Mailing Address and ZIP Code State of Wisconsin Dept. of Regulation Licensing 1400 E Washington Ave. PO Box 8435, Madison, WI 53708	fees for filing Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/27/88	\$10.00
F. Full Name, Mailing Address and ZIP Code Lautenberg for U.S. Senate P.O. Box 2846 Washington, DC 20013	reimbursement for contribution to Lautenberg mistakenly deposited in CFW 2846 Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	11/1/88	150.00
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

5
2
0
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0
0

SUBTOTAL of Disbursements This Page (optional)	49,576.1
TOTAL This Period (last page this line number only)	54,571.36

SCHEDULE B

ITEMIZED DISBURSEMENTS

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

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FOR LINE NUMBER 20

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NAME OF COMMITTEE (in Full)

Council for a Livable World

9 0 4 0 8 0 0 2 2 6

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
<i>Peace Political Action (the transfer for affiliate) 20 Park Plaza Boston, MA 02116</i>	Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify)	<i>10/20/88 10/21/88</i>	<i>2000 10,000</i>
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only)

12,000

SCHEDULE B

ITEMIZED DISBURSEMENTS

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

PAGE 1 OF 2
FOR LINE NUMBER 21

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NAME OF COMMITTEE (in Full)

Council For A Livable World

20040300297

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement in-kind contrib. for Senato cand; see below	Date (month, day, year)	Amount of Each Disbursement This Period
Grimwoods 1228 G St., SE Washington, DC 20003	Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/20/88	\$98.94 (in-kind)
B. Full Name, Mailing Address and ZIP Code Robert Kerrey For US Senate 7602 Pacific St. Omaha, NE 68114	Purpose of Disbursement typesetting	Date (month, day, year) 10/20/88	Amount of Each Disbursement This Period \$49.47 (memo in-kind)
C. Full Name, Mailing Address and ZIP Code Mississippians For Wayne Dowdy c/o 240 Cannon House Office Bldg. Washington, DC 20515	Purpose of Disbursement typesetting	Date (month, day, year) 10/20/88	Amount of Each Disbursement This Period \$49.47 (memo in-kind)
D. Full Name, Mailing Address and ZIP Code Grimwoods (same address)	Purpose of Disbursement in-kind contributions see below	Date (month, day, year) 10/20/88	Amount of Each Disbursement This Period \$77.38 (in-kind)
E. Full Name, Mailing Address and ZIP Code Mike Lowry For US Senate 717 Virginia Street Seattle, WA 98101	Purpose of Disbursement typesetting	Date (month, day, year) 10/20/88	Amount of Each Disbursement This Period \$77.38 (memo in-kind)
F. Full Name, Mailing Address and ZIP Code S & S Mailing 5171 Lawrence Place Hyattsville, MD 20781	Purpose of Disbursement in-kind contribution; see below	Date (month, day, year) 10/20/88	Amount of Each Disbursement This Period \$171.53 (in-kind)
G. Full Name, Mailing Address and ZIP Code Mike Lowry For US Senate (same address)	Purpose of Disbursement postage for mailing	Date (month, day, year) 10/20/88	Amount of Each Disbursement This Period \$171.53 (memo in-kind)
H. Full Name, Mailing Address and ZIP Code Cantrell/Cutter 499 S. Capitol Street, SW Washington, DC 20003	Purpose of Disbursement in-kind contribution; see below	Date (month, day, year) 10/20/88	Amount of Each Disbursement This Period \$849.31 (in-kind)
I. Full Name, Mailing Address and ZIP Code Mike Lowry For US Senate (same address)	Purpose of Disbursement printing	Date (month, day, year) 10/20/88	Amount of Each Disbursement This Period \$849.31 (memo in-kind)

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only)

SCHEDULE B

ITEMIZED DISBURSEMENTS

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

PAGE 2 OF 2
FOR LINE NUMBER 21

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NAME OF COMMITTEE (in Full)

Council For A Livable World

30040300238

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Mass. Envelope Company 30 Cobble Hill Road Somerville, MA 02143	in-kind contribution; see below Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other specify:	10/20/88	\$200.00 (in-kind) (memo in-kind)
B. Full Name, Mailing Address and ZIP Code Mike Lowry For US Senate (same address)	envelopes Disbursement for <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other specify:	10/20/88	\$200.00 (memo in-kind)
C. Full Name, Mailing Address and ZIP Code Postmaster, Boston GMF Permit Fee Window Boston, MA 02115	in-kind contributions; see below Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other specify:	11/8/88	\$160.00 (in-kind) (memo in-kind)
D. Full Name, Mailing Address and ZIP Code Mississippians For Wayne Dowdy (same address)	business reply mail postage (BRM) Disbursement for <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other specify:	11/8/88	\$25.00 (memo in-kind)
E. Full Name, Mailing Address and ZIP Code Humphrey For US Senate 555 Park St., Room 310 St. Paul, MN 55103	BRM postage Disbursement for <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other specify:	11/8/88	\$45.00 (memo in-kind)
F. Full Name, Mailing Address and ZIP Code The Lautenberg Committee PO Box 2846 Washington, DC 20013	BRM postage Disbursement for <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other specify:	11/8/88	\$45.00 (memo in-kind)
G. Full Name, Mailing Address and ZIP Code Joe Lieberman For US Senate 30 Laurel Street Hartford, CT 06106	BRM postage Disbursement for <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other specify:	11/8/88	\$45.00 (memo in-kind)
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other specify:	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other specify:	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)

84

TOTAL This Period (last page this line number only)

1197.16

*Purchase of these items reported in earlier FEC reports.

Council Liv World

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Line#: 11A

Contributor Name & Mailing Address	Employer/Occupation/Aggr\$	Date	\$ Amount
Allegre Allen 14 Lockwood Rd West Newton, MA 02165	Information Requested Not Provided	10/26/88	\$ 150.00 C
__Prim __Genl __Othr	Aggr YTD \$ 225.00*		
Theresa F. Alt 208 Eddy Street Ithaca, NY 14850	Cornell University Secretary-Cornell Univers	10/20/88 10/24/88	\$ 100.00 C \$ 50.00 C
__Prim __Genl __Othr	Aggr YTD \$ 350.00*		
Churches, USA American Baptist c/o Robert W. Tiller 110 Maryland Ave. NE Washington, DC 20002-5888	Dir. of Govt. Relations	11/02/88	\$ 500.00 C
__Prim __Genl __Othr	Aggr YTD \$ 500.00		
Frank C. Andrews 1025 Laurent Street Santa Cruz, CA 95060	Univ of California Professor	10/21/88	\$ 100.00 C
__Prim __Genl __Othr	Aggr YTD \$ 300.00		
Gail E. Asel 205 Hickory Street Maysville, MO 64489	Presbyterian Church Retired Presby. Missioner	11/03/88	\$ 75.00 C
__Prim __Genl __Othr	Aggr YTD \$ 315.00*		
John C. Bailer Jr. 805 E Harding Drive Urbana, IL 61801	retired professor	11/02/88	\$ 30.00 C
__Prim __Genl __Othr	Aggr YTD \$ 250.00*		
Lois M. Barber 728 Ocean Blvd. Shell Beach, CA 93449	LMD Hand Rehab Prods Inc Occupational therapist	10/24/88 10/25/88	\$ 100.00 C \$ 50.00 C
__Prim __Genl __Othr	Aggr YTD \$ 295.00		

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Line#: 11A

Contributor Name & Mailing Address	Employer/Occupation/Aggr	Date	\$ Amount
Paul D. Bertlett 458 Belmont Street #9 Watertown, MA 02172-4933	retired professor	10/21/88	\$ 250.00 C
Prim Genl Othr	Aggr YTD \$ 250.00		
Doris Bato 80 Sutton Place S, Apt 9C8 New York, NY 10022	Information Requested Not Provided	10/21/88	\$ 250.00 C
Prim Genl Othr	Aggr YTD \$ 250.00		
James G. Birney R.R. 1, Box 52 Queenstown, MD 21858	Retired Clergyman	10/20/88	\$ 100.00 C
Prim Genl Othr	Aggr YTD \$ 300.00		
Marvin Boisjoly 8829 Kingsbury University City, MD 63130	retired	11/02/88	\$ 25.00 C
Prim Genl Othr	Aggr YTD \$ 250.00*		
Mary Boyer 448 Willow Street West Barnstable, MA 02688	retired	11/02/88	\$ 100.00 C
Prim Genl Othr	Aggr YTD \$ 360.00*		
Robert Shepard Brainerd 98 Fanno Street Wollaston, MA 02170	retired	10/21/88	\$ 100.00 C
Prim Genl Othr	Aggr YTD \$ 300.00		
Helen W. Brown 505 Old Orchard Rd Baltimore, MD 21202	retired	10/21/88	\$ 200.00 C
Prim Genl Othr	Aggr YTD \$ 290.00		

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Line: 11A

21040300301

Contributor Name & Mailing Address	Employer/Occupation/Aggr\$	Date	\$ Amount
Marie E. Burch PO Box 1884 Borrego Springs, CA 92004	Information Requested Not Provided	10/28/88	\$ 250.00 C
Prim Genl Othr	Aggr YTD \$ 250.00		
John H. Burchard 3311 Wake Drive Kensington, MD 20895	retired	10/28/88	\$ 25.00 C
Prim Genl Othr	Aggr YTD \$ 325.00*		
Nicholas R. Clifford RD 4 Box 515 Middlebury, VT 05753	Information Requested Not Provided	10/21/88	\$ 30.00 C
Prim Genl Othr	Aggr YTD \$ 230.00		
Paul D. Coleman 35 Atkinson Street Rochester, NY 14808	University of Rochester Professor	11/17/88	\$ 50.00 C
Prim Genl Othr	Aggr YTD \$ 205.00		
Frederic G. Corneel 21 Lehigh Road Wellesley Hills, MA 02181	Sullivan of Worcester Lawyer	11/07/88	\$ 250.00 C
Prim Genl Othr	Aggr YTD \$ 350.00		
Priecille Cornelison 8587 State Route 82 Hiram, OH 44234	Self-employed Musician	11/02/88	\$ 100.00 C
Prim Genl Othr	Aggr YTD \$ 335.00*		
Phyllis Byrne Cox 88 Garden Street Cambridge, MA 02138	Retired	10/25/88	\$ 250.00 C
Prim Genl Othr	Aggr YTD \$ 850.00		

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Line#: 11A

Contributor Name & Mailing Address	Employer/Occupation/Aggr	Date	\$ Amount
Peter H. Craig 22181 Chittenden Road Corning, CA 96021	Retired	10/21/88	\$ 25.00 C
__Prim __Gent __Othr	Aggr YTD \$ 205.00*		
Elinor B. Dayton 200 Leader Hill Drive #321 Hamden, CT 06517	Retired Housewife	10/25/88 11/08/88	\$ 200.00 C \$ 100.00 C
__Prim __Gent __Othr	Aggr YTD \$ 600.00*		
Jean Dehlinger 800 San Luis Road Berkeley, CA 94707	housewife	11/02/88	\$ 100.00 C
__Prim __Gent __Othr	Aggr YTD \$ 350.00		
Virginia H. Deknatel 148 Brettle Street Cambridge, MA 02138	Information Requested Not Provided	11/02/88	\$ 250.00 C
__Prim __Gent __Othr	Aggr YTD \$ 250.00		
Clifford J. Earle 314 Elmwood Avenue Ithaca, NY 14850	Cornell University Mathematics prof.	10/21/88	\$ 50.00 C
__Prim __Gent __Othr	Aggr YTD \$ 500.00*		
Janet S. Ele 2010 Van Hise Ave Madison, WI 53705	retired	10/21/88	\$ 50.00 C
__Prim __Gent __Othr	Aggr YTD \$ 250.00*		
Helen W. Ellsworth Selleck Hill Rd, Box 668 Salisbury, CT 06068	Information Requested Not Provided	10/20/88	\$ 100.00 C
__Prim __Gent __Othr	Aggr YTD \$ 300.00		

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Line#: 11A

Contributor Name & Mailing Address	Employer/Occupation/Aggr	Date	\$ Amount
Mary G. Faulconer 2320 Bee Ridge RD #149 Sarasota, FL 34239	Retired	10/20/88	\$ 50.00 C
__Pris __Gent __Othr	Aggr YTD \$ 215.00*		
William F. Fischer Jr Foulkeways, M-17 Gwynedd, PA 19438	Retired	10/21/88	\$ 200.00 C
__Pris __Gent __Othr	Aggr YTD \$ 885.00*		
William Goldman 532 Roosevelt Way San Francisco, CA 94114	Physician	10/21/88 10/25/88	\$ 30.00 C \$ 50.00 C
__Pris __Gent __Othr	Aggr YTD \$ 270.00		
Lawrence Grelle 33 Rockledge Road Hartshole, NY 10530	Magzn Pblshng-Grelle Publ	11/28/88	\$ 300.00 C
__Pris __Gent __Othr	Aggr YTD \$ 300.00		
John Gray 38 Larch Road Cambridge, MA 02138	retired	11/18/88	\$ 150.00 C
__Pris __Gent __Othr	Aggr YTD \$ 350.00*		
Robert N. Greenberg 7012 Braeburn Place Bethesda, MD 20817	Insurance Broker/Self	10/24/88	\$ 100.00 C
__Pris __Gent __Othr	Aggr YTD \$ 300.00		
Jerome Gross MD 77 Dorset Road Waban, MA 02168	Mass. General Hospital biologist	10/24/88	\$ 100.00 C
__Pris __Gent __Othr	Aggr YTD \$ 300.00		

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Line#: 11A

93040600304

Contributor Name & Mailing Address	Employer/Occupation/Aggr\$	Date	\$ Amount
Louis G. Hemed 178-80 Wexford Terrace Apt 4-G Jamaica, NY 11432	Arm, Inc. Personnel recruiter	10/25/88	\$ 30.00 C
__Prim __Genl __Othr	Aggr YTD \$ 250.00		
J. Andrew Harris 3770 21st St. San Francisco, CA 94114	Information Requested Not Provided	10/21/88	\$ 250.00 C
__Prim __Genl __Othr	Aggr YTD \$ 500.00*		
Robert M. Harrison 725 Roble #9 Menlo Park, CA 94025-4829	Retired	11/02/88	\$ 50.00 C
__Prim __Genl __Othr	Aggr YTD \$ 250.00*		
Adam Hochschild 84 Seward St. San Francisco, CA 94114	Self-employed	10/20/88	\$ 5,000.00 C
__Prim __Genl __Othr	Aggr YTD \$ 5,000.00		
Joseph Hoffman 410 Livingston Street New Haven, CT 06511	Yale University Professor of Physiology	10/25/88	\$ 500.00 C
__Prim __Genl __Othr	Aggr YTD \$ 500.00		
Pierre Hohenberg 5 Washington Mews New York, NY 10003	AT&T physicist	10/20/88	\$ 200.00 C
__Prim __Genl __Othr	Aggr YTD \$ 500.00		
Alan F. Key 83 Church Street, #17 Winchester, MA 01890-2003	business executive	10/21/88	\$ 250.00 C
__Prim __Genl __Othr	Aggr YTD \$ 350.00*		

Council Liv World

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Line#: 11A

Contributor Name & Mailing Address	Employer/Occupation/Aggr\$	Date	\$ Amount
Eleanor Nelson Lewis 103 St. Johns Road Baltimore, MD 21210	volunteer	10/21/88	\$ 1,000.00 C
__Prim __Genl __Othr	Aggr YTD \$ 1,150.00		
Elaine MacLachlan 18 Peabody Road Arlington, MA 02174-8120	Teacher	10/21/88	\$ 40.00 C
__Prim __Genl __Othr	Aggr YTD \$ 240.00		
Donald S. Maxwell 543 South Halbert Avenue Redondo Beach, CA 90277	Franklin Medical Group Physician	10/20/88	\$ 50.00 C
__Prim __Genl __Othr	Aggr YTD \$ 380.00*		
Hugh & Katharine McLean 18 Country Lane Windsor, CT 06095-3117	Information Requested Not Provided	11/02/88	\$ 100.00 C
__Prim __Genl __Othr	Aggr YTD \$ 300.00		
Margaret Weiss 43 Maxwell Lane Princeton, NJ 08540	not employed	10/25/88	\$ 50.00 C
__Prim __Genl __Othr	Aggr YTD \$ 4,650.00		
H. A. Maselson 5180 Los Encantos Way Los Angeles, CA 90027	retired	11/21/88	\$ 250.00 C
__Prim __Genl __Othr	Aggr YTD \$ 250.00		
Florence K. Miller 8410 Westmont Terrace Bethesda, MD 20817	Retired	10/21/88	\$ 125.00 C
__Prim __Genl __Othr	Aggr YTD \$ 245.00		

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Council Liv World

*** Confidential Information ***

Line#: 11A

Contributor Name & Mailing Address	Employer/Occupation/Aggr	Date	\$ Amount
Elizabeth Morse 4480 Springmoor Circle Raleigh, NC 27815	Information Requested Not Provided	10/21/88	\$ 500.00 C
__Prim __Genl __Othr	Aggr YTD \$ 1,000.00		
George W. Neumburg Jr 15 East 81st Street New York, NY 10128	self-employed Psychiatrist	11/07/88	\$ 200.00 C
__Prim __Genl __Othr	Aggr YTD \$ 700.00		
Harry S. Olin 55 Windsor Road Webster, MA 02168	Information Requested Not Provided	10/26/88	\$ 500.00 C
__Prim __Genl __Othr	Aggr YTD \$ 570.00		
Robert Olmstead 3882 May Court Palo Alto, CA 94303	Specialty Camps West executive	10/25/88	\$ 2,500.00 C
__Prim __Genl __Othr	Aggr YTD \$ 5,000.00*		
Helen L. Pedotti Arbolado Ranch Geviota, CA 93117	retired	10/26/88	\$ 100.00 C
__Prim __Genl __Othr	Aggr YTD \$ 250.00*		
Arno A. Petersen 208 Carrizo Street Ojai, CA 93023	Retired	10/24/88	\$ 25.00 C
__Prim __Genl __Othr	Aggr YTD \$ 210.00*		
Neal Potter 6801 Brookville Road Chevy Chase, MD 20815	Councilmember	11/03/88	\$ 200.00 C
__Prim __Genl __Othr	Aggr YTD \$ 400.00		

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Council Liv World

*** Confidential Information ***

Line#: 11A

Contributor Name & Mailing Address	Employer/Occupation/Aggr	Date	\$ Amount
Judith Ramseyer 1520 Ward Avenue #301 Honolulu, HI 96822	University of Hawaii Physician	10/24/88	\$ 200.00 C
<input type="checkbox"/> Prim <input type="checkbox"/> Genl <input type="checkbox"/> Othr	Aggr YTD \$ 275.00		
Doris Reed 414 Crestwood Court Endwell, NY 13760	Information Requested Not Provided	11/28/88	\$ 50.00 C
<input type="checkbox"/> Prim <input type="checkbox"/> Genl <input type="checkbox"/> Othr	Aggr YTD \$ 275.00		
John M. Reynolds 1349 Pine Tree Road McLean, VA 22101	retired	10/25/88	\$ 100.00 C
<input type="checkbox"/> Prim <input type="checkbox"/> Genl <input type="checkbox"/> Othr	Aggr YTD \$ 230.00		
Nathan Selwan 82 Day Street Jamaica Plain, MA 02130	Proteon Inc. electrical engineer	10/20/88	\$ 25.00 C
<input type="checkbox"/> Prim <input type="checkbox"/> Genl <input type="checkbox"/> Othr	Aggr YTD \$ 275.00*		
Norbert Selz 291 School Street Acton, MA 01720	Information Requested Not Provided	10/20/88	\$ 25.00 C
<input type="checkbox"/> Prim <input type="checkbox"/> Genl <input type="checkbox"/> Othr	Aggr YTD \$ 225.00*		
Martin Schwarzechild 12 Ober Road Princeton, NJ 08540	Prof Emeritus-Princeton U	10/20/88	\$ 250.00 C
<input type="checkbox"/> Prim <input type="checkbox"/> Genl <input type="checkbox"/> Othr	Aggr YTD \$ 250.00		
Thomas K. Seddon 910 E 22nd Avenue Eugene, OR 97405	physician	11/02/88	\$ 200.00 C
<input type="checkbox"/> Prim <input type="checkbox"/> Genl <input type="checkbox"/> Othr	Aggr YTD \$ 400.00*		

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Council Liv World

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Line#: 11A

Contributor Name & Mailing Address	Employer/Occupation/Aggr\$	Date	\$ Amount
Ray Short 505 South Miller Lafayette, CO 80028	U of Wisconsin Professor, author, lectur	11/03/88 11/03/88	\$ 18.00 C \$ 18.00 C
__Prim__ __Genl__ __Othr__	Aggr YTD \$ 275.90*		
Eather C. Poneck Route 2, Box 1280 Hill & Dale Farms Putney, VT 05348	Farming	10/20/88	\$ 30.00 C
__Prim__ __Genl__ __Othr__	Aggr YTD \$ 480.00*		
Virginia A. Spinney 22 Manchester Street Dorchester, MA 02126	City of Boston teacher	11/28/88	\$ 15.00 C
__Prim__ __Genl__ __Othr__	Aggr YTD \$ 210.00*		
Barry H. Steiner 11865 Mayfield Avenue #8 Los Angeles, CA 90048	CSULB political science profess	10/24/88	\$ 50.00 C
__Prim__ __Genl__ __Othr__	Aggr YTD \$ 250.00		
Gerald H. Stollman 4342 Remegate Lane Bloomfield Hills, MI 48013	Oakland Community College Teacher	10/24/88	\$ 25.00 C
__Prim__ __Genl__ __Othr__	Aggr YTD \$ 235.00*		
Norman C. Tanner 8100 Holladay Boulevard Salt Lake City, UT 84121	Information Requested Not Provided	11/02/88	\$ 100.00 C
__Prim__ __Genl__ __Othr__	Aggr YTD \$ 1,000.00*		
Frank Teagle Jr. PO Box 329 Woodstock, VT 05091	Retired	10/20/88	\$ 300.00 C
__Prim__ __Genl__ __Othr__	Aggr YTD \$ 700.00*		

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Council Liv World

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Line#: 11A

Contributor Name & Mailing Address	Employer/Occupation/Aggr\$	Date	\$ Amount
David Telfair 1858 South Round Barn Road Richmond, IN 47374	Retired	10/24/88	\$ 100.00 C
		11/09/88	\$ 50.00 C
Prim Genl Othr	Aggr YTD \$ 450.00*		
Edward P. Thatcher 1812 Villard Street Eugene, OR 97403	University of Oregon Professor Emeritus U of O	10/20/88	\$ 100.00 C
Prim Genl Othr	Aggr YTD \$ 400.00*		
Russ Toal 917 Barton Woods Road Atlanta, GA 30307	Information Requested Not Provided	10/25/88	\$ 50.00 C
Prim Genl Othr	Aggr YTD \$ 250.00		
Margeret C. Vanderveer 5100 Sharon Rd. Charlotte, NC 28210	Retired	10/21/88	\$ 150.00 C
Prim Genl Othr	Aggr YTD \$ 300.00		
Frank Von Hippel Princeton Univ - Ctr Env Study Princeton, NJ 08540	Physicist-Princeton Univ	10/21/88	\$ 200.00 C
Prim Genl Othr	Aggr YTD \$ 300.00		
Steven H. Waldbaum 230 Gerth Rd., Apt 5D1 Scarsdale, NY 10583-3923	Loeb&Troper CPA	10/24/88	\$ 50.00 C
Prim Genl Othr	Aggr YTD \$ 210.00*		
Robert Weinstock 171 East College Street Oberlin, OH 44074	Oberlin College professor emeritus	10/21/88	\$ 75.00 C
Prim Genl Othr	Aggr YTD \$ 305.00		

90040300309

Council Liv World

*** Confidential Information ***

Line#: 11A

23040600310

Contributor Name & Mailing Address	Employer/Occupation/Aggr\$	Date	\$ Amount
Helen P. Wertheimer RR 4, #4727 Shelburne, VT 05482-8817	landscape architect	11/08/88	\$ 250.00 C
__Prim __Gent __Othr	Aggr YTD \$ 250.00		
Jeanne F. Westheimer 3 Berkeley Street Cambridge, MA 02138	Information Requested Not Provided	11/03/88	\$ 250.00 C
__Prim __Gent __Othr	Aggr YTD \$ 250.00		
Ralph K. White 13801 York Rd, J-10 Cockeysville, MD 21030	George Washington Univers Retired	10/28/88	\$ 2,000.00 C
__Prim __Gent __Othr	Aggr YTD \$ 2,000.00		
Angele M. Williams 1730 Longshore Drive Ann Arbor, MI 48105	Ann Arbor Public Schools teacher	11/02/88	\$ 450.00 C
__Prim __Gent __Othr	Aggr YTD \$ 450.00		
Annie Lee Williams 143 E College Street #201 Oberlin, OH 44074	Retired	10/28/88	\$ 25.00 C
__Prim __Gent __Othr	Aggr YTD \$ 230.00*		
Charlotte F. Wing 48 Rimmon Road Woodbridge, CT 06525	Retired	10/21/88	\$ 50.00 C
__Prim __Gent __Othr	Aggr YTD \$ 225.00		
Richard B. Wolf 3965 E 10th Court Hialeah, FL 33013	Richland Mills, Inc. Executive	10/26/88	\$ 200.00 C
__Prim __Gent __Othr	Aggr YTD \$ 235.00*		

Council Liv World

*** Confidential Information ***

Line#: 11A

Contributor Name & Mailing Address	Employer/Occupation/Aggr	Date	\$ Amount
------------------------------------	--------------------------	------	-----------

Angela F Wylie 18 Larch Road Cambridge, MA 02138	Bed & Breakfast	10/24/88	\$ 150.00 C
Prim Genl Othr	Aggr YTD \$	250.00	

90040600311

*** FRS-4.19.0-2 ***
10/20/88 to 11/28/88

FUND RAISING SYSTEM
FEC Schedule A - Receipts

Date: 01-DEC-88
Page: 00014

Council Liv World

*** Confidential Information ***

Line#: 11A

=====

Total Contributors 00085

Total Households 00085

Number Contributions 00091

Total Dollars \$ 22,466.00

=====

90040300312

DEC 3745

RONALD C. PETERSON
FORTIETH FLOOR
355 SOUTH GRAND AVENUE
LOS ANGELES, CALIFORNIA 90071-3101
(213) 683-0800

August 8, 1989

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
09 AUG 14 PM 4 12

CONFIDENTIAL

Mr. Danny L. McDonald
Chairman
Federal Election Commission
Washington, D.C. 20463

Attention: Robert Raich

Re: MUR 2764
Cranston for Senate '92, Inc. and
Solomon M. Kamm, as Treasurer

Dear Chairman McDonald:

Responding to your July 5, 1989 letter to Solomon M. Kamm, Treasurer, Cranston for Senate '92, Inc., not surprisingly, Committee staffers involved in Senator Cranston's 1986 reelection campaign have no recollection of either the \$900 contribution or the \$1000 contribution referenced in MUR 2764. However, it appears that someone mistakenly thought the \$1000 contribution was from a Mrs. Kohl. My best information presently is that both contributions were from Mr. Kohl. The mistaken attribution of the contribution resulted in its not being identified as an excessive contribution and refunded, as well as its being inadvertently incorrectly reported.

Enclosed is a copy of a check refunding the \$900 excess contribution from Mr. Kohl. The Committee promptly will amend the incorrect report. The Committee regrets its failure to identify

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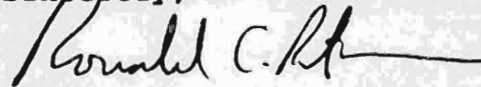
Mr. Danny L. McDonald
August 8, 1989
Page Two

and refund the excess contribution earlier, as well as the inadvertent incorrect reporting.

This situation must be evaluated in the context of a campaign that raised over \$11 million dollars from approximately 140,000 contributors. Overall, the Committee established an excellent record of timely identifying and refunding contributions that were excessive or otherwise impermissible. In the course of its own ongoing internal audit procedures, the Committee identified and refunded 57 contributions totalling approximately \$40,000.

The Committee's filings with the Commission and its conduct over the course of Senator Cranston's 1986 reelection campaign demonstrate substantial compliance with and a good faith effort to comply in all respects with both the letter and spirit of federal election law. I respectfully submit that no action should be taken by the Commission in this matter. However, if the Commission decides to proceed, the Committee and its current treasurer are interested in pursuing pre-probable cause conciliation. This letter constitutes a request in writing to do so. See 11 C.F.R. Section 111.18(d).

Sincerely,



Ronald C. Peterson
Attorney for
Cranston for Senate '92, Inc. and
Solomon M. Kamm, as Treasurer

RCP:lv
Enclosure
(1215T)
cc: Solomon M. Kamm, Esq.

90040300314

SECURITY PACIFIC NATIONAL BANK
400 South Hope Street, Los Angeles, Ca 90071

CRANSTON FOR SENATE 88 '92
GENERAL ACCOUNT
6380 WILSHIRE BLVD. STE. 1815
LOS ANGELES, CA 90048
(213) 882-0727

No 2895

August 7 19 89

16-4/1220

PAY NINE HUNDRED and no/100-----\$ 900.00
TO THE ORDER OF

Herbert H. Kohl

Sylvia M. Korman

⑈00002895⑈ ⑆122000043⑆748⑈003055⑈

DETACH AND RETAIN THIS STATEMENT

THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW

IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED

200408003

DATE	DESCRIPTION	AMOUNT
08/07/89	Refund of excess contribution	\$900.00

CRANSTON FOR SENATE 88

GENERAL ACCOUNT

SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
 Council for a Livable World and)
 Eliot Hubbard, as treasurer)
 Herb Kohl for United States)
 Senate, Inc. and Linda de la)
 Mora, as treasurer)
 Herb Kohl)
 Cranston for Senate '92, Inc. and)
 Solomon M. Kamm, as treasurer)

MUR 2764

09 AUG -3 AM 9:49

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Council for a Livable World ("CLW") and its treasurer have responded to the Commission's interrogatories and document requests in this matter (Attachment 1). Those respondents have also expressed an interest in pursuing pre-probable cause conciliation. Because all of the other respondents in this matter have received extensions of time to reply, this Office recommends that the Commission deny CLW's conciliation request at this time, so the Commission may first review the responses from the other respondents.

II. RECOMMENDATIONS

1. Deny at this time the conciliation request from Council for a Livable World and Eliot Hubbard, as treasurer.

2 J O 4 0 8 0 0 3 1 6

2. Approve and send the attached letter.

Lawrence M. Noble
General Counsel

Date 8/2/89

By: 
Lois G. Lerner
Associate General Counsel

Attachments

1. CLW's response
2. Letter

Staff Member: R. Raich

90040800317

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	
Council for a Livable World and)	
Eliot Hubbard, as treasurer)	
Herb Kohl for United States)	MUR 2764
Senate, Inc. and Linda de la)	
Mora, as treasurer)	
Herb Kohl)	
Cranston for Senate '92, Inc. and)	
Solomon M. Kamm, as treasurer)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on August 7, 1989, the Commission decided by a vote of 5-0 to take the following actions in MUR 2764:

1. Deny at this time the conciliation request from Council for a Livable World and Eliot Hubbard, as treasurer.
2. Approve and send the letter recommended in the General Counsel's Report dated August 2, 1989.

Commissioners Aikens, Elliott, Josefiak, McDonald, and McGarry voted affirmatively for the decision. Commissioner Thomas returned his ballot marked "no vote."

Attest:

8-8-89
Date

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

Received in the Secretariat:	Thursday, August 3, 1989	at 9:49
Circulated to the Commission:	Thursday, August 3, 1989	at 4:00
Deadline for vote:	Monday, August 7, 1989	at 4:00

9 5 0 4 0 3 0 0 3 1 8



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

August 15, 1989

Rosalie Anders
Assistant Executive Director
Council for a Livable World
20 Park Plaza
Boston, Massachusetts 02116

RE: MUR 2764
Council for a Livable World
Eliot Hubbard, as treasurer

Dear Ms. Anders:

On July 5, 1989, you were notified that the Federal Election Commission found reason to believe Council for a Livable World and Eliot Hubbard, as treasurer, violated 2 U.S.C. § 434(b). On July 14, 1989, you submitted a request to enter into conciliation negotiations prior to a finding of probable cause to believe

The Commission has considered your request and determined, because of the need to complete the investigation, to decline at this time to enter into conciliation prior to a finding of probable cause to believe.

At such time when the investigation in this matter has been completed, the Commission will reconsider your request to enter into conciliation prior to a finding of probable cause to believe.

If you have any questions, please contact Robert Raich, the attorney handling this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

90040300319

06 C3934

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

411 East Wisconsin Avenue
Milwaukee, Wisconsin 53202-4487
414/277-5000
FAX 414/277-5591

Attorneys at Law in
Milwaukee and Madison, Wisconsin
West Palm Beach and Naples, Florida
Phoenix, Arizona

89 SEP -5 AM 10:52

Quarles & Brady

August 31, 1989

VIA FACSIMILE

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

Attention: Mr. Robert Raich

Re: MUR2764
Herb Kohl and Herb Kohl for United States, Senate,
Inc.

Dear Mr. Raich:

As discussed in our previous telephone conversation, this will confirm that our clients Herb Kohl for United States Senate, Inc. and Herb Kohl desire to participate in a pre probable cause conciliation with respect to the above matter.

This will also confirm that I will be in touch with you early next week to discuss the manner of approaching the conciliation process so as to maximize the potential that we can arrive at an agreement acceptable to all parties.

Very truly yours,

QUARLES & BRADY

Samuel J. Recht
Samuel J. Recht

SJR/ed

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
89 SEP -5 PM 12:13

20040500320

89 OCT 13 AM 11:58

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
 Council for a Livable World and)
 Eliot Hubbard, as treasurer)
 Herb Kohl for United States)
 Senate, Inc. and Linda de la)
 Mora, as treasurer)
 Herb Kohl)
 Cranston for Senate '92, Inc. and)
 Solomon M. Kamm, as treasurer)

SENSITIVE

MUR 2764

GENERAL COUNSEL'S REPORT

I. BACKGROUND

The Commission has now received responses to the reason to believe findings from all of the respondents. The response from Council for a Livable World ("CLW") and its treasurer was included in the General Counsel's Report signed on August 2, 1989. The responses on behalf of Herb Kohl for United States Senate, Inc. and its treasurer (the "Kohl Committee") and Herb Kohl are attached to this Report as Attachment 1. The response on behalf of Cranston for Senate '92, Inc. and its treasurer (the "Cranston Committee") is attached to this Report as Attachment 2.

II. FACTUAL AND LEGAL ANALYSIS

A. Earmarked Contributions

1. Reporting of Contributions Received Through CLW

The Commission found reason to believe the Kohl Committee violated 11 C.F.R. § 110.6(c)(3) by failing to report that \$7,248 of contributions it received were earmarked contributions bundled through CLW. The Commission's Regulations provide that the intended recipient of an earmarked contribution must

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disclose each conduit through which the contribution passed.

The investigation has verified that the Kohl Committee received the earmarked contributions from CLW, and that CLW was a conduit.¹ The Kohl Committee has requested conciliation prior to a finding of probable cause to believe. (Attachment 1, page 31) Accordingly, this Office recommends that the Commission enter into conciliation negotiations with the Kohl Committee at this time.

2. Reporting of In-Kind Contributions

Each report of receipts and disbursements must disclose all contributions received from other political committees and the identification of each political committee which makes a contribution to the reporting committee, together with the date and amount of such contribution. 2 U.S.C. §§ 434(b)(2)(D) and (3)(B). Each report filed by an unauthorized committee must disclose all contributions made to other political committees and the name and address of each political committee which has received a contribution from the reporting committee, together with the date and amount of such contribution. 2 U.S.C. §§ 434(b)(4)(H)(i) and (6)(B)(i). Each report must also

1. The General Counsel's Office does not recommend that the Commission accede to counsel's argument that because the Kohl Committee paid for the solicitation, CLW did not act as a conduit. The fact that the Kohl Committee paid for certain solicitation costs merely indicates that those costs were not in-kind contributions by CLW to the Kohl Committee, but that fact alone does not transform CLW from a conduit into a fundraising agent of the Committee. Moreover, as the next section of this Report discusses, the Kohl Committee did not, in fact, pay for all costs of the solicitation. In addition, CLW itself properly reported that it was a conduit for the earmarked contributions.

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disclose the amount and nature of outstanding debts and obligations owed by or to the reporting committee. 2 U.S.C. § 434(b)(8).

The Commission found reason to believe the Kohl Committee and CLW violated 2 U.S.C. § 434(b) because it appeared the Kohl Committee may have made an unreported contribution to CLW in the form of expenses for the solicitation for the earmarked contributions.² This finding was based on an analysis of the Kohl Committee's and CLW's reports, which indicated that on September 15, 1988, the Kohl Committee paid more for the solicitation than did CLW. The investigation reveals, however, that the Kohl Committee pre-paid all of its costs for the solicitation on September 15, while CLW pre-paid only a portion of its costs on that date, and reported paying the remainder on October 24.

It appears, however, that CLW made a small unreported contribution to the Kohl Committee. After receiving the reason to believe notice, CLW discovered that its original calculations were mistaken; specifically, it had paid \$311.92 which the Kohl Committee should have paid for the solicitation. Upon discovering the error, CLW billed the Kohl Committee for the \$311.92, and the Kohl Committee has now paid that amount to CLW. (Attachment 1, pages 22-23)

Due to the inadvertent nature of the violation, its

2. The solicitation's disclaimers appear to be proper. They state that Mike Lowry for U.S. Senate Committee and the Kohl Committee authorized the solicitation, and that CLW and the Kohl Committee paid for it.

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relatively small size, and the fact that it has been refunded, this Office recommends that the Commission take no further action against CLW, and that the Commission close the file with respect to CLW. Because the General Counsel's Office is recommending entering into conciliation negotiations with the Kohl Committee, the attached Conciliation Agreement for the Kohl Committee includes references to this issue.

B. Excessive Contribution

No person may contribute more than \$1,000 per election to any federal candidate. 2 U.S.C. § 441a(a)(1)(A). No political committee may knowingly accept any excessive contribution. 2 U.S.C. § 441a(f). Each report filed by a political committee must disclose the identification of each person who makes a contribution to the committee in excess of \$200. 2 U.S.C. § 434(b)(3)(A).

In accord with the Commission's reason to believe findings, counsel concedes that Herb Kohl made contributions totaling \$1,900 to the Cranston Committee. (Attachment 1, pages 7-8) Similarly, counsel concedes that the Cranston Committee knowingly accepted the excessive portion of the contribution and incorrectly reported that it received \$1,000 from a "Mrs. Herbert Kohl." (Attachment 2, page 1) The Cranston Committee has now refunded \$900 to Mr. Kohl, and has amended its report.

In conformity with the respondents' requests, this Office recommends that the Commission enter into conciliation negotiations with the respondents at this time.

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III. DISCUSSION OF CONCILIATION PROVISIONS

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IV. RECOMMENDATIONS

1. Take no further action against Council for a Livable World and Eliot Hubbard, as treasurer, and close the file with respect to these respondents.
2. Enter into conciliation negotiations prior to findings of probable cause to believe with Herb Kohl for United States Senate, Inc. and Linda de la Mora, as treasurer, Herb Kohl, and Cranston for Senate '92, Inc. and Solomon M. Kamm, as treasurer.
3. Approve the attached conciliation agreements.

4. Approve and send the attached letters.

Lawrence M. Noble
General Counsel

10-12-89
Date

By: 
Lois G. Lerner
Associate General Counsel

Attachments

- 1. Kohl Committee's responses
- 2. Cranston Committee's response
- 3. Conciliation Agreements
- 4. Letters

Staff Member: R. Raich

90040300326

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

Council for a Livable World and Eliot)

Hubbard, as treasurer)

Herb Kohl for United States Senate, Inc.)

and Linda de la Mora, as treasurer)

Herb Kohl)

Cranston for Senate '92, Inc. and Solomon M.)

Kamm, as treasurer)

MUR 2764

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on October 18, 1989, the Commission decided by a vote of 4-0 to take the following actions in MUR 2764:

1. Take no further action against Council for a Livable World and Eliot Hubbard, as treasurer, and close the file with respect to these respondents.
2. Enter into conciliation negotiations prior to findings of probable cause to believe with Herb Kohl for United States Senate, Inc. and Linda de la Mora, as treasurer, Herb Kohl, and Cranston for Senate '92, Inc. and Solomon M. Kamm, as treasurer.
3. Approve the conciliation agreements attached to the General Counsel's Report dated October 12, 1989.
4. Approve and send the letters attached to the General Counsel's Report dated October 12, 1989.

(continued)

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FEDERAL ELECTION COMMISSION
CERTIFICATION FOR MUR 2764
OCTOBER 18, 1989

PAGE 2

Commissioners Aikens, Elliott, Josefiak and McDonald
voted affirmatively for the decision. Commissioner Thomas
recused himself from this matter and did not cast a vote.
Commissioner McGarry did not cast a vote.

Attest:

10-19-89
Date

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

Received in the Secretariat: Friday, October 13, 1989 11:58
Circulated to the Commission: Monday, October 16, 1989 11:00
Deadline for vote: Wednesday, October 18, 1989 11:00

90040300328



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 25, 1989

Rosalie Anders
Assistant Executive Director
Council for a Livable World
20 Park Plaza
Boston, Massachusetts 02116

RE: MUR 2764
Council for a Livable World
Eliot Hubbard, as treasurer

Dear Ms. Anders:

On July 5, 1989, you were notified that the Federal Election Commission found reason to believe that Council for a Livable World violated 2 U.S.C. § 434(b).

The Commission has reviewed your submission indicating Council for a Livable World made a \$311.92 in-kind contribution to Herb Kohl for United States Senate, Inc., but after considering the circumstances of the matter, the Commission determined on October 18, 1989 to take no further action against Council for a Livable World. Thus, the Commission has closed the file as it pertains to Council for a Livable World, and no conciliation will be necessary. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

The Commission reminds you that failing to report in-kind contributions appears to be a violation of 2 U.S.C. § 434(b). You should take immediate steps to insure that this activity does not occur in the future.

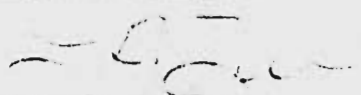
90040300329

Rosalie Anders
Page 2

If you have any questions, please contact Robert Raich, the attorney handling this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel


BY: Lois G. Lerner
Associate General Counsel

90040300330



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 25, 1989

Samuel J. Recht, Esquire
Quarles & Brady
411 East Wisconsin Avenue
Milwaukee, Wisconsin 53202

RE: MUR 2764
Herb Kohl for United States
Senate, Inc. and Linda de la
Mora, as treasurer
Herb Kohl

Dear Mr. Recht:

On June 22, 1989, the Federal Election Commission found reason to believe your clients violated the Federal Election Campaign Act of 1971, as amended, and Regulations promulgated pursuant thereto. At your request, on October 18, 1989, the Commission determined to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

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

If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Robert Raich, the attorney handling this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

By: Lois G. Lerner
Associate General Counsel

Enclosure
Conciliation Agreement

90040300331



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 25, 1989

Ronald C. Peterson, Esquire
Fortieth Floor
355 South Grand Avenue
Los Angeles, California 90071

RE: MUR 2764
Cranston for Senate '92, Inc. and
Solomon M. Kamm, as
treasurer

Dear Mr. Peterson:

On June 22, 1989, the Federal Election Commission found reason to believe Cranston for Senate '92, Inc. and Solomon M. Kamm, as treasurer, violated 2 U.S.C. §§ 441a(f) and 434(b)(3)(A). At your request, on October 18, 1989, the Commission determined to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

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

If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Robert Raich, the attorney handling this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

By: Lois G. Lerner
Associate General Counsel

Enclosure
Conciliation Agreement

90040300332

STATEMENT OF DESIGNATION OF COUNSEL

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

NO. 2764

90 JUN 16 PM 5:39

NAME OF COUNSEL: Robert Bauer

ADDRESS: Perkins & Coie

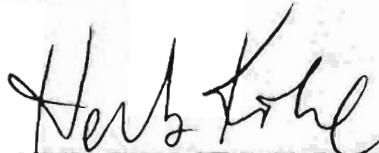
Suite 1200

1110 Vermont Ave. N.W.

TELEPHONE: Washington, D.C. 20005
(202) 956-5419

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.

January 11, 1990
Date



Signature Herbert Kohl

RESPONDENT'S NAME: Herbert Kohl

ADDRESS: 825 N. Jefferson Street

Milwaukee, WI 53202

HOME PHONE: (414) 273-3161

BUSINESS PHONE: (414) 271-6600

90040300333

STATEMENT OF DESIGNATION OF COUNSEL

RECEIVED
GENERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

OBC 5133

NR 2764

98 JAN 16 PM 5:39

NAME OF COUNSEL: Robert Bauer

ADDRESS: Perkins & Coie

Suite 1200

1110 Vermont Ave. N.W.

Washington, D.C. 20005

TELEPHONE: (202) 956-5419

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.

January 11, 1990
Date



Signature Herbert Kohl, President

RESPONDENT'S NAME: Herb Kohl for United States Senate, Inc.

ADDRESS: 825 N. Jefferson Street

Milwaukee, WI 53202

HOME PHONE: _____

BUSINESS PHONE: (414) 271-6600

9004030J334

BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of)
)
Herb Kohl for United States) MUR 2764
Senate, Inc. and Linda de la)
Mora, as treasurer)
Herb Kohl)
Cranston for Senate '92, Inc. and)
Solomon M. Kamm, as treasurer)

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On October 25, 1989, the Commission mailed the above-referenced respondents proposed conciliation agreements in settlement of this matter prior to findings of probable cause to believe.

II. DISCUSSION OF CONCILIATION PROVISIONS

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90040300337

90040300338

90040300339


9004030J340

III. RECOMMENDATIONS

1. Take no further action regarding the reason to believe finding that Herb Kohl for United States Senate, Inc. and Linda de la Mora, as treasurer, violated 2 U.S.C. § 434(b).
- 2.
3. Approve the attached conciliation agreement.
4. Accept the counterproposal submitted on behalf of Cranston for Senate '92, Inc. and Solomon M. Kamm, as treasurer.
5. Approve and send the attached letters.

Lawrence M. Noble
General Counsel

3/23/90
Date

By: 
Lois G. Lerner
Associate General Counsel

Attachments

1. Original Kohl Conciliation Agreement
- 2.
3. Letter from counsel
4. Proposed Kohl Conciliation Agreement
5. Original Cranston Conciliation Agreement
6. Cranston counterproposal
7. Proposed letters

Staff Member: R. Raich

90040300341

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Herb Kohl for United States)
Senate, Inc. and Linda de la) MUR 2764
Mora, as treasurer)
Herb Kohl)
Cranston for Senate '92, Inc. and)
Solomon M. Kamm, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on March 30, 1990, the Commission decided by a vote of 4-0 to take the following actions in MUR 2764:

1. Take no further action regarding the reason to believe finding that Herb Kohl United States Senate, Inc. and Linda de la Mora, as treasurer, violated 2 U.S.C. § 434(b).
- 2.
3. Approve the conciliation agreement, as recommended in the General Counsel's report dated March 23, 1990.

(continued)

9004030J342

4. Accept the counterproposal submitted on behalf of Cranston for Senate '92, Inc. and Solomon M. Kamm, as treasurer, as recommended in the General Counsel's report dated March 23, 1990.
5. Approve and send the letters, as recommended in General Counsel's report dated March 23, 1990.

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

Attest:

3-30-90

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in the Secretariat: Mon., March 26, 1990 11:06 a.m.
Circulated to the Commission: Mon., March 26, 1990 4:00 p.m.
Deadline for vote: Fri., March 30, 1990 4:00 p.m.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 4, 1990

Ronald C. Peterson, Esquire
Fortieth Floor
355 South Grand Avenue
Los Angeles, California 90071

RE: MUR 2764
Cranston for Senate '92, Inc. and
Solomon M. Kamm, as
treasurer

Dear Mr. Peterson:

On March 30, 1990, the Federal Election Commission accepted the signed conciliation agreement submitted on your clients' behalf in settlement of violations of 2 U.S.C. §§ 441a(f) and 434(b)(3)(A), provisions of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter as it pertains to your clients. This matter will become a part of the public record within 30 days after it has been closed with respect to all other respondents involved. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Please be advised that information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

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

Enclosed you will find a copy of the fully executed conciliation agreement for your files. If you have any

20040300344

Ronald C. Peterson, Esquire
Page 2

questions, please contact Robert Raich, the attorney handling
this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel



BY: Lois G. Lerner
Associate General Counsel

Enclosure
Conciliation Agreement

90040800345

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Cranston for Senate '92, Inc. and) MUR 2764
Solomon M. Kamm, as treasurer)

CONCILIATION AGREEMENT

This matter was initiated by a signed, sworn, and notarized complaint by Jann. L. Olsten, Executive Director of the National Republican Senatorial Committee. The Federal Election Commission (the "Commission") found reason to believe Cranston for Senate '92, Inc. and Solomon M. Kamm, as treasurer (the "Respondents") violated 2 U.S.C. §§ 441a(f) and 434(b)(3)(A).

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

I. The Commission has jurisdiction over the Respondents and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. § 437g(a)(4)(A)(i).

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

90040300346

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

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

1. Cranston for Senate '92, Inc. (the "Committee") is a political committee within the meaning of 2 U.S.C. § 431(4).

2. Solomon M. Kamm, is now the treasurer of the Committee. At the time of the violations in question, however, the Committee had a different treasurer and was named "Cranston for Senate '86 Committee."

3. The Committee and its treasurer accepted contributions totaling \$1,900 from Herb Kohl with respect to the 1986 general election.

4. The Committee and its treasurer incorrectly reported receiving a \$1,000 contribution from Mr. Kohl as a contribution from "Mrs. Herbert Kohl."

V. 1. a. Pursuant to 2 U.S.C. § 441a(a)(1)(A), no person may contribute more than \$1,000 per election to any authorized political committee. Pursuant to 2 U.S.C. § 441a(f), no political committee may knowingly accept any excessive contribution.

90040300347

b. The Committee and its treasurer accepted contributions totaling \$1,900 from Herb Kohl, in violation of 2 U.S.C. § 441a(f).

2. a. Pursuant to 2 U.S.C. § 434(b)(3)(A), each report of receipts and disbursements filed by a political committee must disclose the identification of each person who makes a contribution to the committee in excess of \$200.

b. The Committee and its treasurer reported a \$1,000 contribution received from Herb Kohl as coming from a "Mrs. Herbert Kohl," in violation of 2 U.S.C. § 434(b)(3)(A).

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of five hundred dollars (\$500), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

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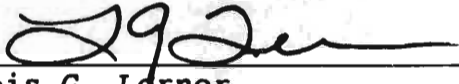
VIII. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

IX. Respondents shall have no more than 30 days from the date this agreement becomes effective to comply with and implement the requirement contained in this agreement.

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

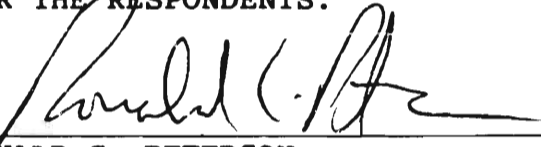
FOR THE COMMISSION:

Lawrence M. Noble
General Counsel

By: 
Lois G. Lerner
Associate General Counsel

4/3/90
Date

FOR THE RESPONDENTS:


RONALD C. PETERSON
Attorney for Respondents

January 25, 1990
Date

90040300349



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 4, 1990

Samuel J. Recht, Esquire
Quarles & Brady
411 East Wisconsin Avenue
Milwaukee, Wisconsin 53202

RE: MUR 2764
Herb Kohl for United States
Senate, Inc. and Linda de la
Mora, as treasurer
Herb Kohl

Dear Mr. Recht:

Moreover, on March 30, 1990, the Commission voted to take no further action regarding the reason to believe finding that Herb Kohl for United States Senate, Inc. and Linda de la Mora, as treasurer, violated 2 U.S.C. § 434(b) in connection with the in-kind contribution of mailing costs advanced by Council for a Livable World.

Enclosed herewith is the new conciliation agreement which we submit for your signature. The Commission is still hopeful that this matter can be settled through a conciliation agreement. Insofar as the 30-day period for pre-probable cause conciliation has elapsed, you should respond within fifteen days after your receipt of this notification. If a response is not received within this period, this matter will proceed to the next stage of the enforcement process.

90040300350

Samuel J. Recht, Esquire
Page 2

Should you have any further questions, please contact
Robert Raich, the attorney handling this matter, at (202)
376-8200.

Sincerely,

Lawrence M. Noble
General Counsel


BY: Lois G. Lerner
Associate General Counsel

Enclosure
Conciliation Agreement

90040300351

OGC 596d

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

RONALD C. PETERSON
FORTIETH FLOOR
355 SOUTH GRAND AVENUE
LOS ANGELES, CALIFORNIA 90071-3101
(213) 683-0800

90 APR 18 AM 10:55

HAND DELIVERED

April 17, 1990

BY FEDERAL EXPRESS

Mr. Danny L. McDonald
Chairman
Federal Election Commission
Washington, D.C. 20463

Attention: Robert Raich

Re: **MUR 2764; Conciliation Agreement**

Dear Chairman McDonald:

On behalf of Cranston for Senate '86, Inc. (the "Committee"), I am writing to request that this letter be included in the public record regarding the above-referenced Conciliation Agreement. Not surprisingly given the passage of time, Committee staffers involved in Senator Cranston's 1986 reelection campaign have no recollection of either the \$900 contribution or the \$1000 contribution referenced in MUR 2764. However, it appears that someone mistakenly thought the \$1000 contribution was from a Mrs. Kohl. The mistaken attribution of the contribution resulted in its not being identified as an excessive contribution and refunded, as well as its being incorrectly reported.

The \$900 excess contribution was refunded immediately upon its being discovered, and the Committee promptly amended its FEC report. The Committee regrets its failure to identify and refund the excess contribution earlier, as well as the inadvertent incorrect reporting.


RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 APR 19 AM 2:59

90040300352

Mr. Danny L. McDonald
April 17, 1990
Page Two

This situation must be evaluated in the context of a campaign that raised over \$11 million dollars from approximately 140,000 contributors. Overall, the Committee established an excellent record of timely identifying and refunding contributions that were excessive or otherwise impermissible. The Committee's filings with the Commission and its conduct over the course of Senator Cranton's 1986 reelection campaign demonstrate substantial compliance with and a good faith effort to comply in all respects with both the letter and spirit of federal election law.

Sincerely,



Ronald C. Peterson
Attorney for
Cranston for Senate '86, Inc.

RCP:lv
(1991T)

90040300353

411 East Wisconsin Avenue
Milwaukee, Wisconsin 53202-4497
414/277-5000
Telecopier 414/271-3552

COE 6249
Offices in
Milwaukee and Madison, Wisconsin
West Palm Beach and Naples, Florida
Phoenix, Arizona

Quarles & Brady

May 15, 1990

Lawrence M. Noble, Esq.
General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Attention: Bob Raich

Re: MUR 2764

Gentlemen:

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We do not believe that the alleged violation, committed inadvertently by Senator Kohl, on a simple misunderstanding of the operation of the per election limit in this instance, merits a civil penalty. Senator Kohl made the contribution in question in error. As we have advised, the Senator has, over the course of his career, devoted substantial resources to assuring that all of his affairs -- business or political -- are conducted in full compliance with the relevant laws. Errors can happen, however, but errors of a minimal nature should be addressed with remedies proportionate to the original problem. The assessment of a civil penalty adds to the public record a clear suggestion that his conduct was of such a nature that a "fine" was appropriately levied against him. This is a result that he does not deserve.

We recognize that the Commission is charged with the enforcement of this statute and that the error made by Senator Kohl arguably placed him in technical violation. But we recognize also that the Commission has broad discretion in determining how to treat violations of this nature and we have observed from a review of the agency's enforcement record that this discretion is fully and variously exercised in a wide range of cases, both minor and major. The sound exercise of

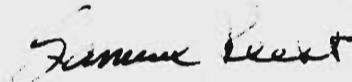
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Lawrence M. Noble, Esq.
May 15, 1990
Page 2

discretion in this instance should be directed toward maintaining for, public and other purposes, some perspective on Mr. Kohl's limited role in this matter. We firmly believe that a "no further action" finding, accompanied by full disclosure of the relevant facts, achieves that objective.

Very truly yours,

QUARLES & BRADY



Samuel J. Recht

SJR/ed
Enclosures
cc's:

Mr. Robert Raich
Robert Bauer, Esq.

90040800355

06-7067

RECEIVED
FEDERAL ELECTION COMMISSION

411 East Wisconsin Avenue
Milwaukee, Wisconsin 53202-4497
414/277-5000
FAX 414/277-5591

Attorneys at Law in
Milwaukee and Madison, Wisconsin
West Palm Beach and Naples, Florida
Phoenix, Arizona

90 JUL 26 AM 10:01

Quarles & Brady **HAND DELIVERED**

July 25, 1990

VIA FEDERAL EXPRESS

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

Attention: Robert Raich

Re: MUR 2764
Herbert Kohl for United States Senate, Inc.
and Herbert Kohl

Dear Mr. Raich:

Enclosed you will find the Conciliation Agreement forwarded with the Commission's letter dated July 6, 1990 which I have executed on behalf of the respondents. Please return a copy of the Agreement executed on behalf of the Commission.

As we discussed, we plan to file a final statement for inclusion in the file in this matter.

Thank you very much for your consideration in this matter.

Very truly yours,

QUARLES & BRADY

Samuel J. Recht
Samuel J. Recht

SJR/ed
Enclosure
cc: Robert Bauer, Esq.

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RECEIVED
FEDERAL ELECTION COMMISSION
90 JUL 26 AM 11:41

90 AUG -9 AM 7:26

BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of)	
)	
Herb Kohl for United States)	MUR 2764
Senate, Inc. and Linda de la)	
Mora, as treasurer)	
Herb Kohl)	

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On June 26, 1990 the Commission voted to approve a new Conciliation Agreement in this matter and to give the respondents five days to accept it before this Office would proceed to the next stage of the enforcement process. The respondents have now accepted that Conciliation Agreement without changes (Attachment 1). Accordingly, this Office recommends that the Commission accept the attached Conciliation Agreement and close the file in this matter.

II. RECOMMENDATIONS

1. Accept the attached Conciliation Agreement and close the file.
2. Approve the appropriate letter.

Lawrence M. Noble
General Counsel

Date 8/6/90

By: 
Lois G. Lerner
Associate General Counsel

Attachment
Conciliation Agreement

Staff Member: R. Raich

90040300357

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Herb Kohl for United States) MUR 2764
Senate, Inc. and Linda de la)
Mora, as treasurer;)
Herb Kohl.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on August 13, 1990, the Commission decided by a vote of 4-0 to take the following actions in MUR 2764:

1. Accept the Conciliation Agreement and close the file, as recommended in the General Counsel's Report dated August 6, 1990.
2. Approve the letter, as recommended in the General Counsel Report dated August 6, 1990.

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

Attest:

8-13-90
Date

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

Received in the Secretariat: Thurs., August 9, 1990 7:26 a.m.
Circulated to the Commission: Thurs., August 9, 1990 11:00 a.m.
Deadline for vote: Mon., August 13, 1990 11:00 a.m.

dr

90040300358



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 21, 1990

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Jann L. Olsten
Executive Director
National Republican Senatorial Committee
440 First Street, N.W., Suite 600
Washington, D.C. 20001

RE: MUR 2764

Dear Mr. Olsten:

This is in reference to the complaint you filed with the Federal Election Commission on November 3, 1988, concerning Herb Kohl for United States Senate, Inc. and Linda de la Mora, as treasurer; Herb Kohl; Wisconsin Action Coalition PAC - WACPAC and James Jeffrey Eagan, as treasurer; Cranston for Senate '92, Inc. and Solomon M. Kamm, as treasurer; and Council for a Livable World and Eliot Hubbard, as treasurer.

The Commission found that there was reason to believe most of the respondents violated provisions of the Federal Election Campaign Act of 1971, as amended, and Regulations promulgated pursuant thereto. Two Conciliation Agreements signed on behalf of respondents were accepted by the Commission. Accordingly, the Commission closed the file in this matter on August 13, 1990. Copies of the agreements are enclosed for your information.

If you have any questions, please contact Robert Raich, the attorney handling this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosures
Conciliation Agreements

90040600359



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 21, 1990

Samuel J. Recht, Esquire
Quarles & Brady
411 East Wisconsin Avenue
Milwaukee, Wisconsin 53202

RE: MUR 2764
Herb Kohl for United States
Senate, Inc. and Linda de la
Mora, as treasurer
Herb Kohl

Dear Mr. Recht:

On August 13, 1990, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on your clients' behalf in settlement of violations of 2 U.S.C. § 441a(a)(1)(A) and 11 C.F.R. § 110.6(c)(3). Accordingly, the file has been closed in this matter.

This matter will become a part of the public record within 30 days. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel. Please be advised that information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

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

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
Conciliation Agreement

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Herb Kohl for United States) MUR 2764
Senate, Inc. and Linda de la)
Mora, as treasurer)
Herb Kohl)

CONCILIATION AGREEMENT

This matter was initiated by a signed, sworn, and notarized complaint by Jann L. Olsten, Executive Director of the National Republican Senatorial Committee. The Federal Election Commission (the "Commission") found reason to believe that Herb Kohl for United States Senate, Inc. and Linda de la Mora, as treasurer (the "Committee") violated 11 C.F.R. § 110.6(c)(3), and that Herb Kohl violated 2 U.S.C. § 441a(a)(1)(A).

NOW, THEREFORE, the Commission and the Respondents, having participated in informal methods of conciliation as provided in 11 C.F.R. § 111.18(d), prior to a finding of probable cause to believe that a violation has occurred, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondents and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. § 437g(a)(4)(A)(i).

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

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

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

1. Herb Kohl for United States Senate, Inc. is a political committee within the meaning of 2 U.S.C. § 431(4).
2. Linda de la Mora is the treasurer of Herb Kohl for United States Senate, Inc.
3. The Committee reported on its 1988 Pre-General Election Report receipts including \$7,248 of contributions transmitted to it by the Council for a Livable World but did not identify such \$7,248 so received as earmarked contributions received through the Council for a Livable World (the "Council"). Rather, the Committee reported receipt of those contributions as if they had been received directly from the individual contributors.
4. Respondents contend that they relied on erroneous advice that their payments to the Council to cover costs of solicitation of the contributions obviated the necessity for reporting such contributions as "earmarked" and received through a conduit.
5. Herb Kohl made two contributions totaling \$1,900 to Cranston for Senate '86 with respect to the 1986 general election. Respondents contend that although both contributions were made after the primary election and neither contribution was designated for the primary election, Herb Kohl assumed he was making contributions with respect to both the primary and general elections and thus believed his contributions were not excessive.

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V. 1. Pursuant to 11 C.F.R. § 110.6(c)(3), the intended recipient of an earmarked contribution shall disclose each conduit through which the contribution passed. The Committee failed to disclose in its 1988 Pre-General Election Report that \$7,248 of contributions it accepted were earmarked contributions received through a conduit, in violation of 11 C.F.R. § 110.6(c)(3).

2. Pursuant to 2 U.S.C. § 441a(a)(1)(A), no person may make contributions to any authorized political committee aggregating in excess of \$1,000 with respect to any election. Herb Kohl made contributions totaling \$1,900 to an authorized committee with respect to a single election, in violation of 2 U.S.C. § 441a(a)(1)(A).

VI. 1. Respondent Committee will pay a civil penalty to the Federal Election Commission in the amount of fifteen hundred dollars (\$1,500), pursuant to 2 U.S.C. § 437g(a)(5)(A).

2. The Committee will amend its 1988 Pre-General Election Report to characterize the receipt of the \$7,248 as earmarked contributions transmitted by the Council acting as a conduit.

VII. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

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VIII. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

IX. Respondents shall have no more than 30 days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement.

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

FOR THE COMMISSION:

Lawrence M. Noble
General Counsel

BY:

Lois G. Lerner
Lois G. Lerner
Associate General Counsel

8/20/97
Date

FOR THE RESPONDENTS:

Samuel J. Recht
Samuel J. Recht
Attorney for Respondents

7-25-90
Date

90040800364

06C7669

411 East Wisconsin Avenue
Milwaukee, Wisconsin 53202-4487
414/277-5000
FAX 414/277-5581

Attorneys at Law in
Milwaukee and Madison, Wisconsin
West Palm Beach and Naples, Florida
Phoenix, Arizona

Quarles / Brady

CLOSED

August 27, 1990

90 AUG 30 AM 11:1

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 AUG 30 PM 2:48

Federal Election Commission
Office of General Council
999 E Street, NW
Washington D.C. 20463

Attention: Robert Raich

Re: MUR 2764, Herbert Kohl for United States Senate
and Herbert Kohl

Dear Mr. Raich:

As this matter comes to a close, and in accordance with your letter of August 21, 1990, I wish to make the following statement on behalf of the Kohl for Senate campaign committee, to be included in the FEC's public file.

The Kohl for Senate committee made every effort to comply with federal election laws during the 1988 campaign. The committee devoted an extraordinary amount of attention and resources in an attempt to make certain it was following both the spirit and letter of the law.

When the question arose as to how to report contribution checks written to Kohl for Senate, but collected and forwarded to the committee by the Council for a Livable World, we asked the advice of others who had handled such contributions in the past.

We were advised that those checks should be reported as individual contributions, just as if they had been sent to the committee directly by the donors. We were further advised that many other U.S. Senate candidates had followed that procedure in the past.

It is disappointing that a committee which took such pains to comply with the law should end up being embroiled in a proceeding involving technical provisions in regulations that go beyond the words of the statute itself. Under the current law, guidelines and verbal advice available from the FEC, even the most well-intentioned campaign can end up with technical violations. I might add that the advice one receives from the FEC's telephone hotline varies from one call to the next, depending upon which staff member takes the call.

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Federal Election Commission
August 27, 1990
Page 2

If the Kohl committee is "guilty" of anything, it is of receiving and following bad advice. To put the matter to rest, the Kohl for Senate committee has agreed to a conciliation agreement.

We urge the FEC to review its rules and instructions to candidates, to make it absolutely clear to candidates and their committee treasurers what is expected of them.

Very truly yours,

QUARLES & BRADY


Samuel J. Recht

SJR/ed
cc: Robert Bauer, Esq.
(w/enclosure)

2 1 0 4 0 0 3 6 6



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2764

DATE FILMED 9/13/90 CAMERA NO. 2

CAMERAMAN AS

90040800367



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THE FOLLOWING DOCUMENTATION IS ADDED TO

THE PUBLIC RECORD IN CLOSED MUR 2764.

4030794



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 24, 1990

Lynn Oliphant, Esquire
Manatt, Phelps, Rothenberg & Evans
1200 New Hampshire Avenue, N.W., Suite 200
Washington, D.C. 20036

RE: MUR 2764
Wisconsin Action Coalition
PAC - WACPAC and James
Jeffrey Eagan, as treasurer

Dear Ms. Oliphant:

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

Should you have any questions, contact Robert Raich, the attorney handling this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

A handwritten signature in dark ink, appearing to read "Lois G. Lerner".

BY: Lois G. Lerner
Associate General Counsel

40303725



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 24, 1990

Ronald C. Peterson, Esquire
Fortieth Floor
355 South Grand Avenue
Los Angeles, California 90071

RE: MUR 2764
Cranston for Senate '92, Inc. and
Solomon M. Kamm, as
treasurer

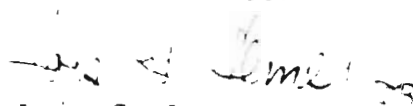
Dear Mr. Peterson:

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

Should you have any questions, contact Robert Raich, the attorney handling this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel


BY: Lois G. Lerner
Associate General Counsel

4000196



FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20463

September 24, 1990

Rosalie Anders
Assistant Executive Director
Council for a Livable World
20 Park Plaza
Boston, Massachusetts 02116

RE: MUR 2764
Council for a Livable World
Eliot Hubbard, as treasurer

Dear Ms. Anders:

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

Should you have any questions, contact Robert Raich, the attorney handling this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

A handwritten signature in cursive script, appearing to read "Lois G. Lerner".

BY: Lois G. Lerner
Associate General Counsel

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