



FEDERAL ELECTION COMMISSION

1125 K STREET NW  
WASHINGTON, D.C. 20543

THIS IS THE END OF MUR # 2044

Date Filmed 10/21/85 Camera No. --- 3

Cameraman AS

85040553946

# FEDERAL ELECTION COMMISSION

7 counting slips (5); 1 listing of permanent file materials (5);  
3 letters initiated by staff for accuracy; 3 avail-  
ation agreement (unsigned) (3); 1 page of General  
Council's Report discussing conciliation (3); EAD  
referral discussing review procedure (3);

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act, 5 U.S.C. Section 552(b):

- |  |   |
|--|---|
| <p><input type="checkbox"/> (1) Classified Information</p> <p><input type="checkbox"/> (2) Internal rules and practices</p> <p><input checked="" type="checkbox"/> (3) Exempted by other statute</p> <p><input type="checkbox"/> (4) Trade secrets and commercial or financial information</p> <p><input checked="" type="checkbox"/> (5) Internal Documents</p> | <p><input type="checkbox"/> (6) Personal privacy</p> <p><input type="checkbox"/> (7) Investigatory files</p> <p><input type="checkbox"/> (8) Banking Information</p> <p><input type="checkbox"/> (9) Well Information (geographic or geophysical)</p> |
|--|---|

Signed Duffy Reilly  
 date 10/9/85

*[Handwritten signature]*

FEC 9-21-77

85040553947



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 16, 1985

Ronald A. Duchin, Treasurer  
VFW Political Action Committee  
200 Maryland Avenue, N.E.  
Washington, D.C. 20002

RE: MUR 2044

VFW Political Action Committee;  
Ronald Duchin, as treasurer

Dear Mr. Duchin:

On October 10, 1985, the Commission accepted the conciliation agreement signed by you in settlement of a violation of 2 U.S.C. § 434(a)(4)(A)(ii), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files.

Sincerely,

Charles N. Steele  
General Counsel

  
BY: Kenneth A. Gross  
Associate General Counsel

Enclosure  
Conciliation Agreement

85040553948

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED AT THE FEC  
GCH# 9809  
85 SEP 23 P 1:19

In the Matter of

VFW Political Action Committee;  
Ronald A. Duchin, as treasurer

)  
) MUR 2044  
)

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission (hereinafter "the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that the VFW Political Action Committee and Ronald A. Duchin, as treasurer, (hereinafter "the Respondents") violated 2 U.S.C. § 434(a)(4)(A)(ii).

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.

III. Respondents enter voluntarily into this agreement with the Commission.

IV. The pertinent facts in this matter are as follows:

1. Respondent, VFW Political Action Committee, is a political committee registered with the Commission.

RECEIVED  
OFFICE OF THE  
GENERAL COUNSEL  
SEP 24 1985

85040553949



2. Respondent, Ronald A. Duchin, is the treasurer of the VFW Political Action Committee.

3. Respondents were required to file the 1984 Pre-General Election Report by October 25, 1984. The report was filed on November 16, 1984, twenty-two (22) days late.

V. Respondents violated 2 U.S.C. § 434(a)(4)(A)(ii) by failing to file timely the 1984 Pre-General Election Report.

VI. Respondents will pay a civil penalty to the Treasurer of the United States in the amount of One Hundred Seventy-Five Dollars (\$175), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. Respondents agree that they shall not undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq.

VIII. 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.

IX. This agreement shall become effective as of the date all parties hereto have executed same and the Commission has approved the entire agreement.

X. Respondents shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

85040553950

XI. 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 valid.

FOR THE COMMISSION:

Charles N. Steele  
General Counsel

BY:

  
Kenneth A. Gross  
Associate General Counsel

Date

October 15, 1985

FOR THE RESPONDENTS:

  
Ronald A. Duchin, Treasurer  
VFW Political Action Committee

Date

September 19, 1985

85040553951

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

VFW Political Action Committee;  
Ronald A. Duchin, as treasurer

)  
)  
) MUR 2044  
)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on October 10, 1985, the Commission decided by a vote of 5-0 to take the following actions in MUR 2044:

1. Accept the conciliation agreement with the VFW Political Action Committee and Ronald A. Duchin, as treasurer, as attached to the General Counsel's Report signed October 3, 1985.
2. Close the file.
3. Approve the letter attached to the General Counsel's Report signed October 3, 1985.

Commissioners Aikens, Elliott, Josefiak, McDonald, and McGarry voted affirmatively for this decision; Commissioner Harris did not cast a vote.

Attest:

10-11-85

Date

*Jody C. Ransom*

for Marjorie W. Emmons  
Secretary of the Commission

Received in Office of Commission Secretary: Mon., 10-7-85, 3:42  
Circulated on 48 hour tally basis: Tues., 10-8-85, 11:00  
Deadline for vote: Thurs., 10-10-85, 11:00

85040533952

VFW - PAC, INC.

SUITE 506

200 MARYLAND AVENUE, N.E., (201) 544-6868  
WASHINGTON, D.C. 20002-6798

FIRST AMERICAN BANK, N.A.  
WASHINGTON, D.C.

№

1570

154 10  
840

CHECK NO.

DATE

AMOUNT

9/19/85

\$175.00

TREASURER OF THE UNITED STATES

DIRECTOR

TREASURER

⑈001570⑈ -⑈054000043⑈

3 200 353⑈



BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

VFW Political Action Committee  
Ronald A. Duchin, as treasurer

)  
)  
)  
)

MUR 2044

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the  
Federal Election Commission executive session of  
September 4, 1985, do hereby certify that the Commission  
took the following actions in MUR 2044:

2. Decided by a vote of 4-2 to take the  
following actions:
  - a) Enter into conciliation with the  
VFW Political Action Committee and  
Ronald A. Duchin, as treasurer, prior  
to a finding of probable cause to  
believe.

(continued)

85040553954

Federal Election Commission  
Certification for MUR 2044  
September 4, 1985

Page 2

- b) Approve the proposed conciliation agreement and letter attached to the General Counsel's report dated August 19, 1985.

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

Attest:

9-6-85

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

85040553955

VETERANS OF FOREIGN WAR OF THE UNITED STATES

RECEIVED AT THE FEC

GCC# 7982

PR: 27

DIRECTOR  
Charles F. Ball, Jr.  
TREASURER  
Ronald A. Duchin

V  
F  
W



POLITICAL ACTION COMMITTEE

BOARD OF DIRECTORS  
John Stang, Kansas, Chairman  
Ted C. Connell, Texas  
Joseph A. Scerra, Massachusetts  
Charles Kinney, New Jersey  
Arthur J. Fellwock, Indiana  
Joe T. Wood, Georgia

July 10, 1985

Mr. Duane A. Brown  
Federal Election Commission  
Washington, D.C. 20463

RE: MUR 2044

Dear Mr. Brown:

This is in response to a letter from Joan D. Aikens, Vice Chairman of the Federal Election Commission dated July 1, 1985 alleging that the VFW Political Action Committee is in violation of the Federal Election Campaign Act of 1971.

A review of our files confirms that we did not file a 12 Day Pre-General Report by October 25, 1985. We did file a report on October 15, 1984 covering the period July 1 - September 30, 1984, and a report on November 18, 1984 for the period October 1 - November 18, 1984 which was later amended to cover October 1 to November 28, 1984. On January 16, 1985 we filed a final report to cover the period November 27 - December 31, 1984.

You will note that the attached correspondence from Lisa Stolaruk of your Reports Analysis Division made no mention of the required 12 Day Pre-General Report nor did we receive any notice that the report had not been received until the FEC letter of July 1. Although we neglected to submit the required report due to oversight, we have submitted factual and accurate accountings for the period in question.

We would like to settle this matter as quickly as possible. If this can be done by conciliation please advise us.

Sincerely yours,

Ronald A. Duchin, Treasurer  
VFW Political Action Committee

RAD:is

Enclosure

• Suite 506 • 200 Maryland Avenue, N.E. • Washington, D.C. 20002-5799

Copy of our report is filed with the Federal Election Commission and is available for purchase from the Federal Election Commission, Wash., D.C.

35 JUL 11 P 2: 20

RECEIVED  
GENERAL COUNSEL

85040553956





FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

NOV 20 1984 RQ-2

Charles F. Ball Jr., Treasurer  
VFW Political Action Committee  
200 Maryland Avenue, N.E.  
Suite 506  
Washington, DC 20002

Identification Number: C00113001

Reference: October Quarterly Report (7/1/84-9/30/84)

Dear Mr. Ball:

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

-Your calculations for Lines 6(b) through 8 appear to be incorrect. FEC calculations disclose this amount to be \$807,417.04. Please provide the corrected total(s) on the Summary Page. OK

-Schedule A of your report discloses receipts from VFW locals. Contributions received from collecting agents are to be attributed to the original contributors and should be disclosed according to the requirements of 11 CFR 104.3(a). If the amounts in question were contributed by individuals and transmitted to your committee by a collecting agent, the activity should be included on Line 11a of the Detailed Summary Page. Any contribution from an individual, that exceeds \$200 in the aggregate during the calendar year, should be itemized on a supporting schedule. Collecting agents need not be identified on your report. OK

To the extent that the funds received were not from entities serving as collecting agents, all non-voluntary contributions should be refunded and disclosed on Schedule B for Line 26a of your next report.

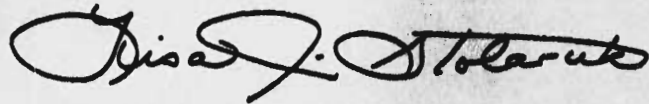
-Please amend Schedule B supporting Line 21 by providing the date for each contribution made to a Federal candidate or political committee. 11 CFR 104.3(b)(3)(ii) and (v). OK

85040553957



An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,



Lisa Stolaruk  
Senior Reports Analyst  
Reports Analysis Division

85040553958

# VETERANS OF FOREIGN WARS OF THE UNITED STATES

**DIRECTOR**  
Fred VonRambow

**TREASURER**  
Forrest H. Hargraves

Charles F. Ball, Jr.

V  
F  
W



P  
A  
C

POLITICAL ACTION COMMITTEE

**BOARD OF DIRECTORS**  
John Stang, Kansas, Chairman  
Ted C. Connell, Texas  
Joseph A. Scerra, Massachusetts  
Charles Kinney, New Jersey  
Ernest Stratyshuk, Michigan  
Arthur J. Fellwock, Indiana

November 26, 1984

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

Identification Number: C00113001

Reference: October Quarterly Report 7/1/84 - 9/30/84  
Pre Election Report - 10/1/84 - 11/18/84

Dear Ms. Stolaruk:

Enclosed please find the adjusted reports which you have requested.

It is understood that the contributions received from various Post's and Auxiliaries are collecting agents and are to be reported as regular contributions.

Thanking you for your assistance in this matter.

Sincerely,

*Charles F. Ball, Jr.*  
Charles F. Ball, Jr. Treasurer

CFB:jgh

85040553959



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

JAN 16 1985

Roland A. Duchin, Treasurer  
VFW Political Action Committee  
200 Maryland Avenue, NE, Suite 506  
Washington, DC 20002

Identification Number: C00113001

Reference: 30 day Post-General Amended Report (10/1/84-11/26/84)  
dated 12/19/84

Dear Mr. Duchin:

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

-Line 21 of the Detailed Summary Page of your report discloses a total of \$89,000 in contributions to Federal candidates. The sum of the entries itemized on Schedule B, however, indicates the total to be \$88,500. Please amend your report to clarify the discrepancy.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,

Lisa J. Stolaruk  
Senior Reports Analyst  
Reports Analysis Division

85040553960

# VETERANS OF FOREIGN WARS OF THE UNITED STATES

**DIRECTOR**  
Charles F. Ball, Jr.  
**TREASURER**  
Ronald A. Duchin



**BOARD OF DIRECTORS**  
John Stang, Kansas, Chairman  
Ted C. Connell, Texas  
Joseph A. Scorra, Massachusetts  
Charles Kinney, New Jersey  
Arthur J. Fellwock, Indiana  
Joe T. Wood, Georgia

January 17, 1985

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

Identification Number C00113001

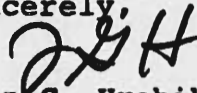
Reference: 30 day Post-General Amended Report (10/1/84-11/26/84)  
dated 12/19/84

Dear Ms. Stolaruk:

Enclosed please find a copy of the amended report of  
which I probably sent you the uncorrected copy.

Hoping this is sufficient.

Sincerely,

  
Jean G. Hrebik  
Bookkeeper  
VFW-Political Action Committee

JGH:jgh  
Enclosure

85040553961



Political Action Committee, Inc.  
Maryland Avenue, N.E. - Suite 506  
Washington, D.C. 20002-5799

85040553962



FROM



VETERANS OF FOREIGN WARS

OF THE UNITED STATES

200 MARYLAND AVENUE, N.E. - WASHINGTON, D.C. 20002

To

Mr. Duane A. Brown  
Federal Election Commission  
Washington, D.C. 20463

CONTENTS—MERCHANDISE. Sealed Parcel Privilege.  
Postmaster: This parcel may be opened for postal inspection if necessary.  
RETURN POSTAGE GUARANTEED



**FEDERAL ELECTION COMMISSION**  
WASHINGTON, D.C. 20463

July 1, 1985

Ronald A. Duchin, Treasurer  
VFW PAC  
200 Maryland Avenue, N.E.  
Suite 506  
Washington, D.C. 20002

Re: MUR 2044  
VFW PAC  
Ronald Duchin, as treasurer

Dear Mr. Duchin:

On June 19, 1985, the Federal Election Commission determined that there is reason to believe the VFW PAC and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's 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 you and the committee. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials, within ten days of your receipt of this letter.

In the absence of any additional information which demonstrates that no further action should be taken against your committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if so desired. See 11 C.F.R. § 111.18(d).

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form

8504053963

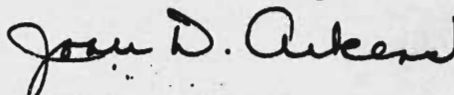
Letter to Ronald A. Duchin  
Page 2

stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

The investigation now being conducted will be 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 Duane A. Brown, the attorney assigned this matter, at (202) 523-4000.

Sincerely,



JOAN D. AIKENS  
Vice-Chairman

Enclosures

General Counsel's Factual and Legal Analysis  
Procedures  
Designation of Counsel Statement

85040553964



GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO. 2044

RESPONDENTS VFW PAC  
Ronald A. Duchin, as treasurer

SUMMARY OF ALLEGATIONS

5  
6  
9  
3  
5  
5  
0  
4  
0  
5  
0  
4  
3  
8

The VFW PAC is an unauthorized political committee which is registered with the Commission and files reports on a quarterly basis. Ronald A. Duchin is its designated treasurer ("respondents"). All unauthorized committees filing reports on a quarterly basis are required to submit a 12 Day Pre-General Report if the committee makes contributions to or expenditures on behalf of Federal candidates involved in the general election. All unauthorized committees were sent prior notification of the filing requirements on October 1, 1984. The respondents made seventy two contributions to Federal candidates involved in the general election but failed to file the 12 Day Pre-General Report in a timely manner.<sup>1/</sup>

FACTUAL BASIS AND LEGAL ANALYSIS

2 U.S.C. § 434(a)(4)(A)(ii) requires unauthorized committees to file:

a pre-election report, which shall be filed no later than the 12th day before... any election in which the committee makes a contribution to or expenditure on behalf of a candidate in such election, and which shall be complete as of the 20th day before the election;

<sup>1/</sup>The 12 Day Pre-General Report was due on October 25, 1985. The respondents filed a report which was characterized as its 12 Day Pre-General on November 16, 1984. That report was subsequently amended to include the period encompassing the 30 Day Post-General report period.



The respondents' failure to file the 12 Day Pre-General Report violates 2 U.S.C. § 434(a)(4)(A)(ii).

Accordingly, this Office recommends that the Commission open a MUR and find reason to believe the respondents violated U.S.C. § 434(a)(4)(A)(ii).

85040553966

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

VFW PAC

Ronald A. Duchin, as treasurer

)  
)  
)  
)  
)

RAD Referral 85NF-111

CERTIFICATION

I, Mary W. Dove, Administrative Assistant for the Federal Election Commission, do hereby certify that on June 19, 1985, the Commission decided by a vote of 6-0 to take the following actions in RAD Referral 85NF-111:

1. Open a MUR.
2. Find reason to believe The Veterans of Foreign Wars PAC and Ronald Duchin, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii).
3. Approve the letter and Factual and Legal Analysis attached to the First General Counsel's Report signed June 14, 1985.

Commissioners Aikens, Elliott, Harris, McDonald, McGarry, and Reiche voted affirmatively in this matter.

Attest:

6-20-85

Date

Mary W. Dove

Mary W. Dove  
Administrative Assistant

85040553967



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary  
FROM: Office of General Counsel *Cut*  
DATE: June 14, 1985  
SUBJECT: RAD 85NF-111: First General Counsel's Report

The attached is submitted as an Agenda document  
for the Commission Meeting of \_\_\_\_\_  
Open Session \_\_\_\_\_  
Closed Session \_\_\_\_\_

CIRCULATIONS

48 Hour Tally Vote [X]  
Sensitive [X]  
Non-Sensitive [ ]  
24 Hour No Objection [ ]  
Sensitive [ ]  
Non-Sensitive [ ]  
Information [ ]  
Sensitive [ ]  
Non-Sensitive [ ]

Other [ ]

DISTRIBUTION

Compliance [X]  
Audit Matters [ ]  
Litigation [ ]  
Closed MUR Letters [ ]  
Status Sheets [ ]  
Advisory Opinions [ ]

Other (see distribution below) [ ]

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

85040553968



RECEIVED  
OFFICE OF THE FEC  
COMMISSION SECRETARY

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

85 JUN 14 P4:11

**FIRST GENERAL COUNSEL'S REPORT**

**SENSITIVE**

DATE AND TIME OF TRANSMITTAL BY OGC TO THE COMMISSION 6/14/85 RAD REFERRAL 85N-111  
STAFF MEMBER D.A. Brown

SOURCE OF MUR: INTERNALLY GENERATED

RESPONDENTS NAMES: VFW PAC  
Ronald A. Duchin, as treasurer

RELEVANT STATUTE: 2 U.S.C. § 434(a)(4)(A)(ii)

INTERNAL REPORTS CHECKED: Respondents'

FEDERAL AGENCIES CHECKED: None

**GENERATION OF MATTER**

This matter was generated by the Reports Analysis Division ("RAD") based on a review of the respondents' 30 Day Post General Report (Attachment I).

**SUMMARY OF ALLEGATIONS**

The VFW PAC is an unauthorized political committee which is registered with the Commission and files reports on a quarterly basis. Ronald A. Duchin is its registered treasurer ("respondents"). All unauthorized committees filing reports on a quarterly basis are required to submit a 12 Day Pre-General Report if the committee makes contributions to or expenditures on behalf of Federal candidates involved in the general election. All unauthorized committees were sent prior notification of the

85040553969



filing requirements on October 1, 1984. The respondents made seventy two contributions to Federal candidates involved in the general election but failed to file the 12 Day Pre-General Report in a timely manner.<sup>1/</sup>

**FACTUAL AND LEGAL ANALYSIS**

2 U.S.C. § 434(a)(4)(A)(ii) requires unauthorized committees to file:

a pre-election report, which shall be filed no later than the 12th day before... any election in which the committee makes a contribution to or expenditure on behalf of a candidate in such election, and which shall be complete as of the 20th day before the election.

The respondents' failure to file the 12 Day Pre-General Report violates 2 U.S.C. § 434(a)(4)(A)(ii).

Accordingly, this Office recommends that the Commission open a MUR and find reason to believe the respondents violated U.S.C. § 434(a)(4)(A)(ii).

**RECOMMENDATIONS**

1. Open a MUR.
2. Find reason to believe The Veterans of Foreign Wars PAC and Ronald Duchin, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii).

<sup>1/</sup>The 12 Day Pre-General Report was due on October 25, 1984. The respondents filed a report which was characterized as its 12 Day Pre-General on November 16, 1984. That report was subsequently amended to include the period encompassing the 30 Day Post-General reporting period. The report indicted that the committee had made the general election contributions between October 12 and 15, 1984.

85040553970

3. Approve the attached letter and Factual and Legal Analysis.

Charles N. Steele  
General Counsel

June 14, 1968  
Date

Kenneth A. Gross  
By: Associate General Counsel

Attachments

1. RAD Referral
2. Factual and Legal Analysis
3. Letter to Ronald A. Duchin

85040553971



ATTACHMENT I

85NF-111

85040553972

VFW POLITICAL ACTION COMMITTEE

(Attachments 23a - 23c)

8 5 0 4 0 5 5 3 9 7 3  
FEDERAL ELECTION COMMISSION  
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (83-04)

DATE 2/24/85  
PAGE 33

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER	COVERAGE DATES	# OF PAGES	RECORDS LOCATION
VFW POLITICAL ACTION COMMITTEE							
CONNECTED ORGANIZATION:	VETERANS OF FOREIGN WARS OF THE UNITED						
	1983 STATEMENT OF ORGANIZATION - AMENDMENT			10JAN83		4	83FEC/200/5200
	STATEMENT OF ORGANIZATION - AMENDMENT			15NOV83		3	83FEC/201/0050
	MID-YEAR REPORT	97,492	15,113	1JAN83 -30JUN83		6	83FEC/211/3182
	YEAR-END	85,884	148,924	1JUL83 -31DEC83		12	84FEC/291/0014
	YEAR-END - AMENDMENT	85,884	148,924	1JUL83 -31DEC83		4	84FEC/301/3059
	REQUEST FOR ADDITIONAL INFORMATION			1JUL83 -31DEC83		2	84FEC/299/2530
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL83 -31DEC83		3	84FEC/301/1
1984	STATEMENT OF ORGANIZATION - AMENDMENT			15AUG84		2	84FEC/325/3
	STATEMENT OF ORGANIZATION - AMENDMENT			27SEP84		3	84FEC/329/51
	STATEMENT OF ORGANIZATION - AMENDMENT			6DEC84		3	84FEC/351/4000
	APRIL QUARTERLY	1,044,310	9,410	1JAN84 -31MAR84		8	84FEC/310/5409
	APRIL QUARTERLY - AMENDMENT	1,044,310	9,410	1JAN84 -31MAR84		8	84FEC/314/2091
	APRIL QUARTERLY - AMENDMENT	1,010,815	9,412	1JAN84 -31MAR84		8	84FEC/320/0012
	REQUEST FOR ADDITIONAL INFORMATION			1JAN84 -31MAR84		1	84FEC/313/4900
	JULY QUARTERLY	135,130	508,333	1APR84 -30JUN84		6	84FEC/320/0080
	OCTOBER QUARTERLY	32,912	99,219	1JUL84 -30SEP84		21	84FEC/343/4679
	OCTOBER QUARTERLY - AMENDMENT	32,912	99,219	1JUL84 -30SEP84		20	84FEC/349/6425
	REQUEST FOR ADDITIONAL INFORMATION			1JUL84 -30SEP84		2	84FEC/344/0915
	POST-GENERAL	1,724	100,836	1OCT84 -13NOV84		24	84FEC/347/2120
	POST-GENERAL - AMENDMENT	1,724	100,836	1OCT84 -13NOV84		23	84FEC/349/4440
	POST-GENERAL	10,107	104,544	1OCT84 -20NOV84		25	84FEC/351/1800
	POST-GENERAL - AMENDMENT	10,107	104,544	1OCT84 -20NOV84		25	84FEC/351/1823
	REQUEST FOR ADDITIONAL INFORMATION			1OCT84 -20NOV84		1	84FEC/350/0000
	YEAR-END	10,343	15,325	2/NOV84 -31DEC84		6	85FEC/301/1290
	TOTAL	1,388,723	0	900,930	0	229	TOTAL PAGES

All Reports Reviewed  
Ending Cash on Hand as of 12/31/84= \$714,038.28  
Outstanding Debts as of 12/31/84= \$0





FEDERAL ELECTION COMMISSION  
WASHINGTON, DC 20540

ATTACHMENT 236  
Page 1 of 2

October 1, 1984

GENERAL ELECTION FILING NOTICE  
FOR UNAUTHORIZED COMMITTEES

WHO MUST FILE THE PRE-GENERAL ELECTION REPORT

All committees that file monthly reports must file the pre-general election report due October 25, 1984.

In addition all quarterly filing committees that have made contributions or expenditures (including independent expenditures) in connection with the general election must file a pre-election report, if such activity has not previously been reported. See below for post-general filing information.

WHAT MUST BE REPORTED

The report must disclose all financial activity of the committee from the later of, the last report filed or the date of registration\* through October 17, 1984. (Monthly filers must disclose all financial activity from the later of October 1 or the date of registration\* through October 17, 1984.)

WHEN TO FILE

Pre-general election reports sent registered or certified mail must be postmarked no later than October 22, 1984. Reports hand delivered or mailed first class must be received no later than close of business October 25, 1984.

\* \* \* \* \*

WHO MUST FILE THE POST-GENERAL ELECTION REPORT

All committees must file the post-general election report due December 6, 1984, regardless of election activity.

WHAT MUST BE REPORTED

The post-general election report must cover all financial activity of the committee from either the date of the last report filed or the date of registration, whichever is later\* through November 26, 1984.

WHEN TO FILE

Post-general election reports sent by registered or certified mail must be postmarked no later than December 6, 1984. Reports hand delivered or mailed first class must be received no later than close of business December 6, 1984.

\*The first report filed by a committee shall include all amounts received or disbursed prior to becoming a political committee, even if such amounts were not received during the current reporting period. See 11 CFR 104.3(a) and (b).

-over-

85040553974

3

### WHERE AND HOW TO FILE

Committees should consult the instructions on the enclosed FEC form 3X, for details.

### QUARTERLY FILERS

Name of Report	Period Covered	Reg./Cert. Mailing Date	Filing Date
3rd Q-Report	07/01* - 09/30	10/15/84	10/15/84
Pre-General	10/01 - 10/17	10/22/84	10/25/84
Post-General**	10/18 - 11/26	12/06/84	12/06/84
Year-end	11/27 - 12/31	01/31/85	01/31/85

\*Or from date of registration, or the close of books of the last report filed, whichever is later.

\*\*Reports filed by committees that did not file the pre-General report should cover all financial activity from the last report filed through November 26, 1984.

\* \* \*

### MONTHLY FILERS

Name of Report	Period Covered	Reg./Cert. Mailing Date	Filing Date
Oct. Monthly	09/01 - 09/30	10/20/84	10/20/84
Pre-General	10/01 - 10/17	10/22/84	10/25/84
Post-General	10/18 - 11/26	12/06/84	12/06/84
Year-end	11/27 - 12/31	01/31/85	01/31/85

### COMPLIANCE

Political committees are fully liable for failure to file any report required under the Act. Failure to file in a timely fashion is a serious violation. Committees are subject to enforcement action for late filing. Illegible reports which can not be clearly reproduced and reports submitted on non-FEC forms will not be accepted. Committees filing such documents will be required to refile.

FOR INFORMATION CALL: Office Of Public Communications  
800/424-9530 or 202/523-4068

85040553975

**REPORT OF RECEIPTS AND DISBURSEMENTS**  
For a Political Committee Other Than an Authorized Committee

(Summary Page)

ALIGN AREA

24 NOV 23 1984

1. Name of Committee (In Full)

Veterans of Foreign Wars -  
Political Action Committee

Address (Number and Street)

200 Maryland Avenue, N.E.  
Suite 506

City, State and ZIP Code

Washington, D.C. 20002

☐ Check here if address is different than previously reported.

2. FEC Identification Number

C00113001

3 ☐ This committee qualified as a multicandidate committee during the Reporting Period on \_\_\_\_\_

4. TYPE OF REPORT (Check appropriate boxes)

(a) ☐ April 15 Quarterly Report ☐ October 15 Quarterly Report

☐ July 15 Quarterly Report ☐ January 31 Year End Report

☐ July 31 Mid Year Report (Non-Election Year Only)

☐ Monthly Report for \_\_\_\_\_

☒ Twelfth day report preceding \_\_\_\_\_  
Election on Nov. 6 in the State of Presidential

☐ Thirtieth day report following the General Election

on \_\_\_\_\_ in the State of \_\_\_\_\_

☐ Termination Report

(b) Is this Report an Amendment?

☐ YES

☒ NO

**SUMMARY**

5 Covering Period Oct 1, 1984 through Nov 18, 1984

6. (a) Cash on hand January 1, 19 84

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 10) Money Contributed

(d) Subtotal (add Lines 6(b) and 6(c) for Column A and  
Lines 6(b) and 6(c) for Column B)

7 Total Disbursements (from Line 28)

8 Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))

9 Debts and Obligations Owed TO The Committee

(Itemize all on Schedule C or Schedule D)

10 Debts and Obligations Owed BY the Committee

(Itemize all on Schedule C or Schedule D)

COLUMN A  
This Period

COLUMN B  
Calendar Year-to-Date

\$ 245,584.98

\$ 807,917.04

\$ 7,924.73

\$ 815,841.77

\$ 100,836.52

\$ 715,005.25

-0-

-0-

\$ 1,186,782.21

\$ 1,432,367.19

\$ 717,361.94

\$ 715,005.25

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

Charles P. Ball, Jr. Treasurer

Type or Print Name of Treasurer

SIGNATURE OF TREASURER

11/15/84

Date

For further information contact:

Federal Election Commission

Toll Free 800-424-9630

Local 702-623-6088

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

All previous editions of FEC FORM 2 and FEC FORM 2a are obsolete and should no longer be used.

FEC FORM 2X (3/80)

815040553976  
010331720



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

Report Covering the Period		From	To
		COLUMN A Total This Period	COLUMN B Calendar Year-To-Date
<b>I. RECEIPTS</b>			
<b>11. CONTRIBUTIONS (other than loans) FROM:</b>			
(a) Individuals/Persons Other Than Political Committees		4938.28	1,130,644.31
(b) Political Party Committees			
(c) Other Political Committees			
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c))		4938.28	1,130,644.31
<b>12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES</b>			
<b>13. ALL LOANS RECEIVED</b>			
<b>14. LOAN REPAYMENTS RECEIVED</b>			
<b>15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)</b>			
<b>16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES</b>			
<b>17. OTHER RECEIPTS (Dividends, Interest, etc.)</b>		2966.45	56,137.96
<b>18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)</b>		7924.73	1,186,782.21
<b>II. DISBURSEMENTS</b>			
<b>19. OPERATING EXPENDITURES</b>		13,236.52	55,811.94
<b>20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES</b>			
<b>21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES</b>		86,600.00	86,600.00
<b>22. INDEPENDENT EXPENDITURES (Use Schedule E)</b>			
<b>23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 9411 old) (Use Schedule F)</b>			
<b>24. LOAN REPAYMENTS MADE</b>			
<b>25. LOANS MADE</b>			
<b>26. REFUNDS OF CONTRIBUTIONS TO</b>			
(a) Individuals/Persons Other Than Political Committees			
(b) Political Party Committees			
(c) Other Political Committees			
<b>(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))</b>			
<b>27. OTHER DISBURSEMENTS</b>			
<b>28. TOTAL DISBURSEMENTS (Add Lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)</b>		99,836.52	716,361.94
<b>III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES</b>			
<b>29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)</b>		4938.28	1,130,644.31
<b>30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)</b>			
<b>31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)</b>		4938.28	1,130,644.31
<b>32. TOTAL OPERATING EXPENDITURES from Line 19</b>		13,236.52	55,811.94
<b>33. OFFSETS TO OPERATING EXPENDITURES from Line 15</b>			
<b>34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)</b>		13,236.52	55,811.94

8910340553977  
150340553977  
8910340553977

6

Pay 16 for  
Line Number 16  
(Use separate line for each  
entry of the Date of  
Summary Page)

SCHEDULE B

ITEMIZED DISBURSEMENTS

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 an individual committee to solicit contributions from such committee.

Name of Committee (in Full)

Veterans of Foreign Wars - Political Action Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
Thomas for Congress P.O. Box 1984 Jesup, GA 31545		10/12	\$1,000.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
Citizens for Mike Lowry P.O. Box 4246 Seattle, WA 98104		10/12	\$500.00
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
Hoyer for Congress 7700 Old Alexandria Ferry Road Clinton, MD 20735		10/12	\$1,000.00
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
Larry Smith for Congress Comm. P.O. Box 9256 PembrokePines, FL 33084		10/12	\$500.00
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
Jepsen '84 Committte P.O. Box 84 Davenport, Iowa 52805		10/12	\$500.00
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
Bill Chappell Campaign Fund 327 Orange Ave. Daytona Beach, FL 32014		10/12	\$1,000.00
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
Carroll Hubbard for Congress P.O. Box 562 Paducah, KY 42002		10/12	\$500.00
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
Daub for Congress P.O. Box 6333 Omaha, NE 68106		10/12	\$1,000.00
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
Congressman Major Owens 1125 Eastern Pkwy Brooklyn, NY 11213		10/12	\$500.00
SUBTOTAL of Disbursements This Page (optional)			\$6,500.00
TOTAL This Period (do not enter this line if no disbursements)			

SCHEDULE B

ITEMIZED DISBURSEMENTS

Page 2 of 16 for  
LINE NUMBER 2  
(Use separate schedule for each  
category of the Detailed  
Summary Page)

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)  
**Veterans of Foreign Wars - Political Action Committee**

	A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
FL	Committee to Re-Elect Congressman Dan Mica P.O. Box 41 Boynton Beach, FL 3345-0004	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/15/84	1,000
CA	B. Full Name, Mailing Address and ZIP Code Mel Levine for Congress 2210 Wilshire Blvd, Suite 316 Santa Monica, CA 90403	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/15	500
NY	C. Full Name, Mailing Address and ZIP Code Committee to Reelect Dave Martin P.O. Box 507 Canton, NY 13617 Attn: Roger Catlin, Treasurer	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/15	1,000
IN	D. Full Name, Mailing Address and ZIP Code Hillis for Congress Committee P.O. Box 5049 Kakomo, IN 46902 Attn: James Meck, Treasurer	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/15	1,000
TX	E. Full Name, Mailing Address and ZIP Code Hightower for Congress Committee P.O. Box 1973 Vernon, Texas 76384 Attn: Wilson Friberg, Treasurer	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/15	1,000
VA	F. Full Name, Mailing Address and ZIP Code Lent for Congress Committee P.O. Box 2305 Arlington, VA 22202	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/15	1,000
WV	G. Full Name, Mailing Address and ZIP Code Alan Mollohan for Congress Committee 807 First National Bank Bldg Fairmont, WV 26554	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/15	1,000
CA	H. Full Name, Mailing Address and ZIP Code Gene Chappie for Congress Marysville, CA 95901	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/15	1,000
FL	I. Full Name, Mailing Address and ZIP Code Larry Smith for Congress P.O. Box 9256 Pembroke, FL 33084	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/15	500
SUBTOTAL of Disbursements This Page (optional)				8,000.00
TOTAL This Period (list date this line number only)				

98150340353928

8



SCHEDULE B

ITEMIZED DISBURSEMENTS

Page 1 of 1  
11-15-88  
(Use table on each page for each category of the Detailed Summary Page)

Any information received 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)

Veterans of Foreign Wars - Political Action Committee

	A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
		Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
MN	Re-Elect Stangeland to Congress Committee P.O. Box 704 Moorhead, MN 56560 Attn: Wayne Puppe, Treasurer		10/15	500
VA	B. Full Name, Mailing Address and ZIP Code Friends of Frank Wolf P.O. Box 1055 Vienna, VA 22180	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/15	1,000
DC	C. Full Name, Mailing Address and ZIP Code James R. Jones Election Committee P.O. Box 2884 Washington, D.C. 20013	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/15	500
CT	D. Full Name, Mailing Address and ZIP Code Congressman Bruce A. Morrison Reelection Committee P.O. Box 303 New Haven, CT 06502-0303	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/15	500
NC	E. Full Name, Mailing Address and ZIP Code Helms for Senate P.O. Box 177000 Raleigh, NC 27619	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/15	500
GA	F. Full Name, Mailing Address and ZIP Code Sam Nunn Campaign Committee P.O. Box 56205 Atlanta, Georgia 30343	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/15	500
NY	G. Full Name, Mailing Address and ZIP Code Pease Campaign P.O. Box 808 Elyria, Ohio 44035	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/15	1,000
OH	H. Full Name, Mailing Address and ZIP Code McGrath for Congress P.O. Box 633 Valley Stream, NY 11580	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/15	500
NJ	I. Full Name, Mailing Address and ZIP Code Citizens for Minish 27 Henry Street Ploomfield, NJ 07003 Attn: Mr. Frank Roth	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/15	500

SUBTOTAL of Disbursements This Page (optional)

5,500.00

TOTAL This Period (last page this form number only)

SCHEDULE B

ITEMIZED DISBURSEMENTS

Page 4 of 16 for  
Line 23c  
Use or cross out for each  
category of the Listed  
Summary Page

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 attract contributions from such committee.

Name of Committee (in Full)

Veterans of Foreign Wars - Political Action Committee

AR	A. Full Name, Mailing Address and ZIP Code The David Pryor for U.S. Senate Committee P.O. Box 3334 Little Rock, Arkansas 72203	Purpose of Disbursement	Date (month, day, year) 10/15	Amount of Each Disbursement This Period 500
		Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
NE	B. Full Name, Mailing Address and ZIP Code Committee to Re-Elect Virginia Smith to Congress Box 548 Chappell, NE 69129	Purpose of Disbursement	Date (month, day, year) 10/15	Amount of Each Disbursement This Period 500
		Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
WI	C. Full Name, Mailing Address and ZIP Code The Sensenbrenner Committee P.O. Box 95 Mequon, Wisconsin 53092	Purpose of Disbursement	Date (month, day, year) 10/15	Amount of Each Disbursement This Period 500
		Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
DC	D. Full Name, Mailing Address and ZIP Code Mavroules for Congress Committee P.O. Box 37274 Washington, D.C. 20013	Purpose of Disbursement	Date (month, day, year) 10/15	Amount of Each Disbursement This Period 500
		Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
DC	E. Full Name, Mailing Address and ZIP Code Burton for Congress 120 Cannon Office Building Washington, D.C. 20515 Attn: Don Thompson	Purpose of Disbursement	Date (month, day, year) 10/15	Amount of Each Disbursement This Period 500
		Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
NJ	F. Full Name, Mailing Address and ZIP Code Howard for Congress Committee 902 Main Street Belmar, NJ 07719	Purpose of Disbursement	Date (month, day, year) 10/15	Amount of Each Disbursement This Period 500
		Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
TX	G. Full Name, Mailing Address and ZIP Code Michael A. Andrews for Congress Committee C/O Mr. John Sharman 1001 Fannin, Suite 2500 Houston, TX 77002	Purpose of Disbursement	Date (month, day, year) 10/15	Amount of Each Disbursement This Period 1,000
		Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
TN	H. Full Name, Mailing Address and ZIP Code Re-Elect Marilyn Lloyd to Congress Post Office Box 1568 Chattanooga, TN 37401	Purpose of Disbursement	Date (month, day, year) 10/15	Amount of Each Disbursement This Period 1,000
		Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
NY	I. Full Name, Mailing Address and ZIP Code Committee to Re-Elect LaFalce P.O. Box 383 Niagara Falls, NY 14302	Purpose of Disbursement	Date (month, day, year) 10/15	Amount of Each Disbursement This Period
		Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		

SUBTOTAL of Disbursements This Page (optional)

5

TOTAL This Period (last page this line number only)

10

SCHEDULE B

ITEMIZED DISBURSEMENTS

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)  
**Veterans of Foreign Wars - Political Action Committee**

State	Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
WI	Friends of Les Aspin Post Office Box 211 Racine, Wisconsin 53401	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/15	500
NY	Friends of Ham Fish, Jr. P.O. Box 4829 Poughkeepsie, NY 12602	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/15	1,000
CA	George Brown to Congress Committee P.O. Box 1421 Riverside, California 92502	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/15	500
CO	The Armstrong Committee 3900 Mexico Avenue, Suite 200 Denver, CO 80210 Attn: Pete Jacobson	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/15	500
WI	Toby Roth for Congress '84 P.O. Box 2673 Appleton, WI 54913 Attn: John Hennehy, Treasurer	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/15	500
TX	Steve Bartlett Congressional Campaign Committee P.O. Box 30680 Dallas, Texas 75230	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/15	500
PA	Doug Walgren for Congress Committee P.O. Box 2525 Pittsburgh, PA 15230	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/15	500
MN	Friends of Vin Weber Committee P.O. Box 1690 Willmar, MN 56201	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/15	500
OH	Latta for Congress Campaign R.R. 2, Box 1516 Paulding, Ohio 45879	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/15	500
SUBTOTAL of Disbursements This Page (optional)				5,000.00
TOTAL This Period (last page this line number only)				

8504055371  
917331

11



SCHEDULE B

ITEMIZED DISBURSEMENTS

Page 8 of 16  
LINE NUMBER 21  
(Use separate sheet for each category of disbursements Summary Page)

Any information received 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)

VFW-Political Action Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Stenholm for Congress P.O. Box 1032 Stamford, TX 79553	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/15	\$500.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Barbara Kennelly for Congress 664 Prospect Ave. Hartford, CT 06105	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/15	\$500.00
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Comm. to Reelect Clarence D. Long P.O. Box 6731 Towson, MD 21204	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/15	\$500.00
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
1984 Reelect Roe to Congress P.O. Box 407 Wayne, NJ 07470	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/15	\$500.00
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Parris for Congress P.O. Box 704 Springfield, VA 22150	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/15	\$1,000.00
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Comm. to Reelect Congresswoman Nancy Johnson P.O. Box 1930, New Britain, CT 06050	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/15	\$500.00
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Comm. to Reelect Congressman Mario Biaggi 299 Broadway, Suite 1500 New York, NY 10007	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/15	\$500.00
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Friends of Clay Shaw P.O. Box 11903 Ft. Lauderdale, FL 33339	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/15	\$1,000.00
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Citizens for Downey P.O. Box 91P Bayshore, NY 11706	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/15	\$500.00
SUBTOTAL of Disbursements This Page (optional)			\$4,600.00
TOTAL This Period (last page - line number only)			

9815349537923

16

SCHEDULE B

ITEMIZED DISBURSEMENTS

Page 2 of 11  
LINE NUMBER  
(Use separate sheets for each category of the Detailed Summary Page)

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)

VFW-Political Action Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Sabo Volunteer Committee 2425 E. Franklin Ave., Apt 310 Minn., MN 55406	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/15	\$500.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Bob Stump Election Comm. P.O. Box F Tolleson, AZ 85353	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/15	\$500.00
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Matt Hatchadorian Congress '84 4469 Mayfield Rd. S.Euclid, OH 44121	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/15	\$500.00
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Daschle for Congress Comm. PP.O. Box 1656 Sioux Falls, SD 57101	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/15	\$500.00
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Friends of Jay Rockefeller P.O. Box 840 Charleston, WV 25323	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/15	\$500.00
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Comm. to Reelect Congressman Carney P.O. Box 80 Farmingville, NY 11738	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/15	\$1,000.00
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Friends of Daniel Akaka P.O. Box 3169 Honolulu, HI 96802	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/15	\$500.00
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Ortiz for Congress Comm. P.O. Box 7806 Corpus Christi, TX 78415	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/15	\$1,000.00
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Volunteers for Chandler P.O. Box 5755 Bellevue, WV 98006	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	10/15	\$1,000.00

SUBTOTAL of Disbursements This Page (optional)

\$6,000.00

TOTAL This Period (list page this line number only)

**SCHEDULE B**

**ITEMIZED DISBURSEMENTS**

Page 12 of 16 for  
LINE NUMBER 21  
(Use address in column for each  
category of the Detailed  
Summary Page)

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 which contributions from such committee.

Name of Committee (in Full)

**Veterans of Foreign Wars - Political Action Committee**

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
CO Committee for Tim Wirth P.O. Box 576 Westminster, CO 80030		10/15	500
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
CA Lantos in Congress P.O. Box 611 Burlingame, CA 94011		10/15	500
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
NY Jerry Solomon for Congress Committee P.O. Box 459 Saratoga Springs, NY 12866		10/15	500
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
NY Committee for Congressman Bill Greyn P.O. Box 1505 Murray Hill Station New York, NY 10156		10/15	500
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
WI Citizens for Dave Obey Committee P.O. Box 1322 Wausau, Wisconsin 54401		10/15	500
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
CO Ken Kramer Committee P.O. Box 25848 Colorado Springs, CO 80936		10/15	500
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
NY People for Wortley P.O. Box 27 Syracuse, NY 13201		10/15	1,000
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
MD Friends of Marjorie Holt Committee P.O. Box 1827 Annapolis, MD 21404		10/15	1,000
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		
NY Stan Lundine for Congress Committee P.O. Box 674 Jamestown, NY 14701		10/15	500
SUBTOTAL of Disbursements This Page (optional) .....			5,500.00
TOTAL This Period (last page this line number only) .....			

14



Political Action Committee, Inc.  
Maryland Ave., N.E., Suite 606  
Washington, D.C. 20002-5799

8 5 0 4 0 5 5 3 9 8 6  
8 4 0 3 3 1 9 2 7 4 3

84 NOV 23 411 2

FEDERAL ELECTION COMMISSION  
1325 "K" STREET, N.W.  
WASHINGTON, DC 20463

ATTACHMENT 23c  
page 11 of 11

CERTIFIED

P18 8276185

15

# ATTACHMENT II

## GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO. \_\_\_\_\_

RESPONDENTS VFW PAC  
Ronald A. Duchin, as treasurer

### SUMMARY OF ALLEGATIONS

The VFW PAC is an unauthorized political committee which is registered with the Commission and files reports on a quarterly basis. Ronald A. Duchin is its designated treasurer ("respondents"). All unauthorized committees filing reports on a quarterly basis are required to submit a 12 Day Pre-General Report if the committee makes contributions to or expenditures on behalf of Federal candidates involved in the general election. All unauthorized committees were sent prior notification of the filing requirements on October 1, 1984. The respondents made seventy two contributions to Federal candidates involved in the general election but failed to file the 12 Day Pre-General Report in a timely manner.<sup>1/</sup>

### FACTUAL BASIS AND LEGAL ANALYSIS

2 U.S.C. § 434(a)(4)(A)(ii) requires unauthorized committees to file:

a pre-election report, which shall be filed no later than the 12th day before... any election in which the committee makes a contribution to or expenditure on behalf of a candidate in such election, and which shall be complete as of the 20th day before the election;

<sup>1/</sup>The 12 Day Pre-General Report was due on October 25, 1985. The respondents filed a report which was characterized as its 12 Day Pre-General on November 16, 1984. That report was subsequently amended to include the period encompassing the 30 Day Post-General report period.

The respondents' failure to file the 12 Day Pre-General Report violates 2 U.S.C. § 434(a)(4)(A)(ii).

Accordingly, this Office recommends that the Commission open a MUR and find reason to believe the respondents violated U.S.C. § 434(a)(4)(A)(ii).

85040553988





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Ronald A. Duchin, Treasurer  
VFW PAC  
200 Maryland Avenue, N.E.  
Suite 506  
Washington, D.C. 20002

Re: MUR  
VFW PAC  
Ronald Duchin, as treasurer

Dear Mr. Duchin:

On June , 1985, the Federal Election Commission determined that there is reason to believe the VFW PAC and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(ii), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's 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 you and the committee. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials, within ten days of your receipt of this letter.

In the absence of any additional information which demonstrates that no further action should be taken against your committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if so desired. See 11 C.F.R. § 111.18(d).

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form

8504053989

Letter to Ronald A. Duchin  
Page 2

stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

The investigation now being conducted will be 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 Duane A. Brown, the attorney assigned this matter, at (202) 523-4000.

Sincerely,

Enclosures

General Counsel's Factual and Legal Analysis  
Procedures  
Designation of Counsel Statement

85040553990



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.  
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 2044

Date Filmed 10/21/85 Camera No. ---3

Caneraman AS

85040553991