



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.
WASHINGTON, D.C. 20543

THIS IS THE END OF MUR # 2248

Date Filmed 12/19/86 Camera No. --- 2

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FEDERAL ELECTION COMMISSION

FOIA

NUM 2248

Internal Communication, writing slips, 12 day
report, Comment sheet

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):

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

Signed

Charles W. Smith

date

Dec 16, 1986

FEC 9-21-77

1986
12/17/86

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MUR # 2248

MERGED WITH

CROFILM LOCATION

REEL/FRAME

REEL/FRAME

REEL/FRAME

COMPLAINANT NAMES

Planusky, Richard

☐ Continued

RESPONDENT NAMES

Whelan, Robert E.

Morgan Guaranty Trust Company

☐ Continued

MUR DATES

OPENED: 9-22-86

CLOSED: 11-6-86

U.S. CODE CITES

580- 441b

583- 441b(a)

C.F.R. CITES

☐ Continued

☐ Continued

SUBJECT TERMS

460- Contributions

491- * In-kind

514- * Prohibited Contributions

516- ** by corporations, labor organizations and national banks

538- Corporations / Labor Unions / Banks

540- * Contributions and expenditures by

☐ Continued

C. Snyder 12/17/86
CODER (Name and Date)

Thomas J. W. [Signature]
SUPERVISOR (Name and Date)

VERIFIED BY AND SIGNED OFF (Name and Date)



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 12, 1986

Edward C. Cosgrove, Esquire
Suite 1000 Main-Seneca Building
237 Main Street
Buffalo, New York 14203

RE: MUR 2248
Robert E. Whelan

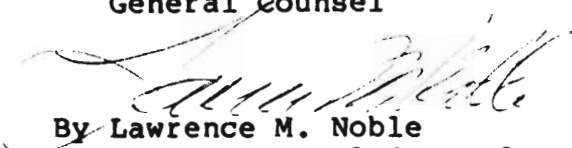
Dear Mr. Cosgrove:

On September 29, 1986, the Commission notified your client of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on November 6, 1986, determined that on the basis of the information in the complaint, and information provided by you, there is no reason to believe that a violation of any statute within its jurisdiction has been committed. Accordingly, the Commission closed its file in this matter. This matter will become a part of the public record within 30 days.

Sincerely,

Charles N. Steele
General Counsel


By Lawrence M. Noble
Deputy General Counsel

Enclosure
General Counsel's Report

86040522277



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 12, 1986

Richard Planavsky
City Hall Room 203
Buffalo, New York 14202

Re: MUR 2248

Dear Mr. Planavsky:

The Federal Election Commission has reviewed the allegations of your complaint dated September 19, 1986, and determined on November 6, 1986, that on the basis of the information provided in your complaint (and information provided by the Respondent) there is no reason to believe that a violation of the Federal Election Campaign Act of 1971, as amended ("the Act") has been committed. Accordingly, the Commission has decided to close the file in this matter. The Federal Election Campaign Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

Should additional information come to your attention which you believe establishes a violation of the Act, you may file a complaint pursuant to the requirements set forth in 2 U.S.C. § 437g(a)(1) and 11 C.F.R. § 111.4.

Sincerely,

Charles N. Steele
General Counsel


By Lawrence M. Noble
Deputy General Counsel

Enclosure
General Counsel's Report

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Edward C. Cosgrove, Esquire
Suite 1000 Main-Seneca Building
237 Main Street
Buffalo, New York 14203

RE: MUR 2248
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Sincerely,

Charles N. Steele
General Counsel

By Lawrence M. Noble
Deputy General Counsel

Enclosure
General Counsel's Report

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11/7/86

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

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City Hall Room 203
Buffalo, New York 14202

Re: MUR 2248

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Sincerely,

Charles N. Steele
General Counsel

By Lawrence M. Noble
Deputy General Counsel

Enclosure
General Counsel's Report

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11/7/86

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Richard Moe, Esquire
Davis Polk & Wardwell
1575 I Street, N.W.
Washington, D.C. 20005

RE: MUR 2248
Morgan Guaranty Trust Co.

Dear Mr. Moe:

On September 29, 1986, the Commission notified your client of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on , 1986, determined that on the basis of the information in the complaint, and information provided by you, there is no reason to believe that a violation of any statute within its jurisdiction has been committed. Accordingly, the Commission closed its file in this matter. This matter will become a part of the public record within 30 days.

Sincerely,

Charles N. Steele
General Counsel

By Lawrence M. Noble
Deputy General Counsel

Enclosure
General Counsel's Report

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 2248
Robert E. Whelan)
Morgan Guaranty Trust Company)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on November 6, 1986, the Commission decided by a vote of 6-0 to take the following actions in MUR 2248:

1. Find no reason to believe the Morgan Guaranty Trust Company violated 2 U.S.C. § 441b.
2. Find no reason to believe Robert E. Whelan violated 2 U.S.C. § 441b.
3. Approve and send the letter, as recommended in the First General Counsel's Report signed November 3, 1986.
4. Close the file.

Commissioners Aikens, Elliott, Josefiak, McDonald, McGarry and Thomas voted affirmatively for this decision.

Attest:

11-6-86

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary:	Tues.,	11-4-86,	12:45
Circulated on 48 hour tally basis:	Tues.,	11-4-86,	4:00
Deadline for vote:	Thurs.,	11-6-86,	4:00

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SENSITIVE

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

COMMISSION SECRETARY

FIRST GENERAL COUNSEL'S REPORT

88 NOV 4 12:45

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION:

MUR # 2248
DATE COMPLAINT RECEIVED
BY OGC: 9-22-86
DATE OF NOTIFICATION TO
RESPONDENT: 9-29-86
STAFF MEMBER: Snyder

COMPLAINANT'S NAME: Richard Planavsky

RESPONDENTS' NAMES: Robert E. Whelan
Morgan Guaranty Trust Company

RELEVANT STATUTE: 2 U.S.C. § 441b

INTERNAL REPORTS
CHECKED: None

FEDERAL AGENCIES
CHECKED: None

SUMMARY OF ALLEGATIONS

Richard Planavsky, Commissioner of Administration and Finance for the City of Buffalo, N.Y., filed this complaint on September 22, 1986 against Robert E. Whelan, the elected Comptroller of the City of Buffalo, and the Morgan Guaranty Trust Co. ("Morgan"), a banking organization. (Planavsky was Whelan's unsuccessful opponent for Comptroller in 1983). Whelan engaged Morgan as a financial advisor to the City of Buffalo in connection with a recent bond issue.

On June 16, 1986, the Friends of Bob Whelan ("FBW"), an unregistered committee, held a fundraising dinner for Mr. Whelan at the Lotos Club in Manhattan. According to press reports, the fundraiser was held because Mr. Whelan is considering running

either for re-election as Comptroller or as Erie County Executive in 1987. Invitations to the fundraiser included an RSVP telephone number in Morgan's financial section. In consequence of this gift of secretarial services for handling phone calls related to the fundraiser, FBW reported to the New York Board of Elections an in-kind contribution of \$150 from Morgan.

Under the Act, a national bank is prohibited from making any contribution to a candidate "in connection with any election."

2 U.S.C. § 441b. Complainant alleges that respondents violated

2 U.S.C. § 441b with respect to the foregoing activity.

LEGAL AND FACTUAL ANALYSIS

The pertinent statute states in part:

It is unlawful for any national bank ... to make a contribution or expenditure in connection with any election to any political office, or in connection with any primary election or political convention or caucus held to select candidates for any political office, or for any corporation whatever ... to make a contribution or expenditure in connection with any [federal] election.

2 U.S.C. § 441b(a). Since Whelan was not a candidate for any federal office, but may be a candidate for state office, a political contribution to Whelan by Morgan would violate 2 U.S.C. § 441b only if Morgan were a national bank.

Under the statute governing national banks,

The persons uniting to form such [a national banking] association shall, under their hands, make an organization certificate, which shall specifically state:

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First. The name assumed by such association; which name shall include the word "national."

12 U.S.C. § 22. Since Morgan's name does not include the word "national," it would not appear to be a national bank. Furthermore, Morgan's response states it is not a national bank, but is a state chartered trust company. (See Attachment 2).

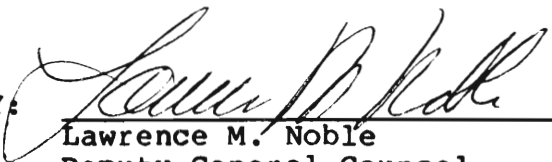
In conclusion, because Mr. Whelan is not a candidate for any Federal office, and because Morgan is not a national bank, a contribution from from Morgan to Robert E. Whelan would not violate 2 U.S.C. § 441b.

RECOMMENDATIONS

1. Find no reason to believe the Morgan Guaranty Trust Company violated 2 U.S.C. § 441b.
2. Find no reason to believe Robert E. Whelan violated 2 U.S.C. § 441b.
3. Approve and send the attached letter.
4. Close the file.

Charles N. Steele
General Counsel

11/3/86
Date

BY: 
Lawrence M. Noble
Deputy General Counsel

Attachments

1. Complaint
2. Letter from Richard Moe
3. Letter from Edward C. Cosgrove
4. Proposed letters to respondents
5. Proposed letter to complainant

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attachment 1

NR 2248



CITY OF BUFFALO
DEPARTMENT OF ADMINISTRATION AND FINANCE

203 CITY HALL BUFFALO, NEW YORK

RICHARD PLANAVSKY
COMMISSIONER

September 19, 1986

Joan D. Aikens
Chairman
Federal Election Commission
Washington, D.C. 20463

Dear Ms. Aikens:

On July 18, 1986 you received my letter requesting a Federal Election Commission investigation of a possible violation of the Federal Election Campaign Act. Your response of July 24, 1986 outlined the specific requirements which are a prerequisite to Commission action on the matter.

Enclosed is a formal complaint prepared in compliance with the specific requirements outlined in your July 24, 1986 letter. I trust the Commission now can undertake a full investigation of the matter described therein.

Your assistance in this matter is appreciated.

Yours truly,

Richard Planavsky

Richard Planavsky, Commissioner
of Administration and Finance

RP:dmc

Enclosure

To Cge

9-22-86

SEP 22 4:43 PM '86

Rec. 9-22-86
Cick

FEDERAL ELECTION COMMISSION
WASHINGTON, D. C.

In the Matter of the Complaint of
RICHARD PLANAVSKY,

Complainant,

-against-

MORGAN GUARANTY TRUST COMPANY
and
ROBERT E. WHELAN,

Respondents.

AFFIDAVIT

SEP 22 04:51

STATE OF NEW YORK)
COUNTY OF ERIE : ss:-
CITY OF BUFFALO)

RICHARD PLANAVSKY, being duly sworn, deposes and says:

1. I am the Commissioner of Administration and Finance for the City of Buffalo, New York, and as such, I supervise and manage the City's Division of the Budget, Division of Management Services, Division of Labor Relations, Division of Parking Enforcement, and Division of the Treasury.

2. My business address is Room 203 City Hall, Buffalo, New York, 14202. My business telephone is (716) 855-5710.

3. Upon information and belief, the Respondent, MORGAN GUARANTY TRUST COMPANY, is a bank or corporation subject to the provisions of Chapter 14 of Title 2 of the United States Code. Its business address is 15 Broad Street, New York City, New York, 10015.

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4. The Respondent, **ROBERT E. WHELAN**, is the elected Comptroller of the City of Buffalo, New York. His business address is Room 1225 City Hall, Buffalo, New York, 14202.

5. The Respondent, **ROBERT E. WHELAN**, for the last several years, has engaged the services of the other Respondent, **MORGAN GUARANTY TRUST COMPANY**, to act as the financial advisor to the City in matters relating to the sale of bonds and notes.

6. The cost of such services to the City of Buffalo during fiscal year 1985-86 was \$94,791.00.

7. The allegations which I make herein are based upon the following sources of information, copies of which are attached hereto:

- (a) The financial disclosure statement filed by the Respondent, **ROBERT E. WHELAN**, with the New York State Board of Elections (Exhibit "1");
- (b) The preliminary official statement of the City, in connection with the sale of City of Buffalo bonds (Exhibit "2", pp. 1 and 59 only);
- (c) The statements of the Respondent, **ROBERT E. WHELAN**, contained in a news-

paper story in the July 9, 1986 edition
of the Buffalo News (Exhibit "3").

8. It is my complaint to Your Honorable Commission that the Respondents have combined during the early part of 1986 to solicit, to receive and to contribute things of value in New York City for election campaign purposes in apparent violation of Section 441(b) of Title II of the U.S. Code, and of other applicable provisions.

9. It is my request that Your Honorable Commission investigate this matter to determine if such a violation has occurred and to take appropriate action thereon.

Richard Planavsky

RICHARD PLANAVSKY

Subscribed and Sworn to before me
this 19 day of September, 1986.

Gene A. Mazusa

Commissioner of Deeds, Buffalo, N. Y.
My commission expires 12/31/86

JJMcL/sc

STATE OF NEW YORK
BOARD OF ELECTIONS

FINANCIAL DISCLOSURE STATEMENT

IDENTIFICATION

FRIENDS OF BOB WHITMAN

Full name of Candidate or Committee — print or type

Ste. 700, 37 Franklin Street

Address — number and street

Buffalo,

New York

14202

City

State

Zip

ID Number — if known

Comptroller, City of Buffalo

Office and District

Democrat

Name of Political Party

☐ Check box
if address has
changed since
last report

TYPE OF REPORT

Check Appropriate Boxes

Date of Election _____

Statement is being filed by:

☐ Candidate☒ Political
Committee☐ Party
Committee☐ Constituted
Committee

Statement reports activities for:

☐ One Candidate☐ More than one CandidateStatement is a Termination Report (you cannot terminate if any funds or debts remain): ☐Statement is an Amendment Report ☐

Amends report previously submitted for period _____

Date

to

Date

REPORTING PERIOD SCHEDULES

Statement period — from

1/15/86

Date

to

7/15/86

Date

Check Appropriate Box

☐ 32 day Pre Primary☐ 32 day Pre General☐ 32 day Pre Special☐ Periodic Jan. 15, 19____☐ 11 day Pre Primary☐ 11 day Pre General☐ 11 day Pre Special☒ Periodic July 15, 1986☐ 27 day Post Primary*☐ 27 day Post General*☐ 27 day Post Special*

*Campaign material must be submitted with 27 day Post-Election statements

VERIFICATION

Must have original signature — sign in pen

ITEMIZED STATEMENT

I state that the information contained in this statement pursuant to the Election Law, is in all respects true and complete to the best of my knowledge, information and belief.

Signature

THOMAS J. CASEY

Treasurer

7/15/86

Title

Date Signed

(Proceed to complete this report on the following pages and schedules.)

IN-LIEU-OF STATEMENT (IF APPLICABLE)

I state that neither the aggregate receipts nor the aggregate expenditures, has exceeded or will exceed one thousand dollars in connection with this campaign.

Signature

Title

Date Signed

(If you qualify to submit this IN-LIEU OF STATEMENT, you may now STOP,
SIGN and SUBMIT it as your report.)Any false information made in this statement may be punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.
For further information, contact the New York State Board of Elections or your local Board of Elections.NEW YORK STATE BOARD OF ELECTIONS
99 WASHINGTON AVENUE
ALBANY, NEW YORK 12210

EXHIBIT "1"

85040522900

GENERAL INSTRUCTIONS

This financial statement must be prepared in ink or typed. A statement prepared in pencil may not be accepted for filing. The form is designed for use by either a Candidate or a Committee. Entries on the statement should come from the accounting records maintained by the preparer. Refer to the instructions in the financial disclosure guide booklet, regarding the jurisdiction to which this report must be filed.

The ID Number will be assigned by the State Board of Elections to all candidates and committees filing with the State Board. It should be shown on all reports filed and referred to on all correspondence and inquiries addressed to the State Board of Elections.

This statement must be submitted for each appropriate filing period, and must report the activities of each period itself — separate periods may not be combined into a single report.

All pertinent sections and supporting schedules must be completed — except that an "In-Lieu-Of" statement may be submitted in only the following cases:

- a. A Candidate may submit an "In-Lieu-Of" statement if less than \$1,000 will be expended for the entire campaign.
- b. A Committee may submit an "In-Lieu-Of" statement if less than \$1,000 will be expended for the entire campaign, and the committee is supporting only one candidate, and that Candidate has authorized the Committee to engage in the campaign.

The verification section, whether it be the Itemized Statement or the In-Lieu-Of Statement, must have an original signature.

Contributions: Monetary contributions include all cash, checks, money orders, etc., received, and they must be detailed in *Schedule 2A*.

Non-cash contributions are campaign contributions accepted via property received, certain personal services or facilities provided for campaign use. These must be detailed and valued in the appropriate section of *Schedule 2B*. Line 2B and Line 5B are offset against each other, so that the cash fund balance will not be distorted for purposes of reporting.

Transfers in and Transfers out: For purposes of financial statement reporting, transfers are deemed to occur by passing a sum of money from any campaign fund held by any Committee, to any campaign fund held by any other Committee or other Committee's Candidate. Certain of these interchanges, while considered transfers for reporting purposes, may effect maximum contribution limitations. Refer to the Election Law or to the instructional guide booklet for the legal considerations involved.

The Status of Campaign Costs section must be completed for each report submitted. It accumulates campaign costs for this election campaign, and should not accumulate costs of more than a single election campaign. This campaign is as indicated on the Date of Election line on Page 1, in the section captioned Type of Report.

The Allocation of Campaign Costs section must be completed for each report submitted. (Note that it need not be completed in the instance of supporting only one Candidate, as it is obvious that the entire cost of such campaign is chargeable to that single Candidate.) The campaign costs shall be allocated among the Candidates in accord with any percentage based upon reasonable standards established by the Committee. Inasmuch as this section allocates the accumulating totals of campaign costs throughout the campaign, from Line 31 of the Status of Campaign Costs section, it thereby represents the total financial support given to each Candidate from the beginning of the campaign through the period covered by this report.

SUMMARY OF RECEIPTS AND EXPENDITURES THIS PERIOD

1. Cash balance at beginning of period—must be same as ending balance Line 7 of preceding report		\$29,039.53
2. Receipts during period:		
A. Monetary contributions received (Schedule 2A)	21,490.00	
B. Non-cash contributions—must be same as Line 5B (Schedule 2B)	400.00	
C. Total contributions—Line 2A plus Line 2B	21,890.00	
D. Loan(s) received (Schedule 2D)	0.00	
E. Transfers in (Schedule 2E)	0.00	
F. Refunds of campaign expenditures (Schedule 2F)	0.00	
G. Other receipts (Schedule 2G)	926.84	
3. Add Lines 2C through 2G		22,816.84
4. Add Line 1 plus Line 3		51,856.39
5. Expenditures during period:		
A. Campaign expenses paid (Schedule 5A)	8,763.28	
B. Non-cash contribution adjustment—must be same as Line 2B	400.00	
C. Contributions refunded to contributors (Schedule 5C)	0.00	
D. Loan(s) repayments (Schedule 5D)	0.00	
E. Transfers out (Schedule 5E)	10,567.37	
F. Non-campaign housekeeping expenses—only a Party Committee or a Constituted Committee may have an entry on this line—to report ordinary activities which are not for the express purpose of promoting any Candidate	0.00	
6. Add Line 5A through 5F		19,730.65
7. Cash balance at end of period—Line 4 less Line 6		32,125.74

STATUS OF LOANS

8. Loan(s) balance at beginning of period—must be same as ending balance Line 14 of preceding report		0.00
9. Loan(s) received this period—from Line 2D		0.00
10. Add Line 8 plus Line 9		0.00
11. Loan(s) repayments this period—from Line 5D	0.00	
12. Loan(s) forgiven this period (Schedule 12)	0.00	
13. Add Line 11 plus Line 12		0.00
14. Loan(s) balance at end of period—Line 10 less Line 13		0.00

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STATUS OF UNPAID BILLS

15. Unpaid bills at beginning of period—must be same as ending total Line 21 of preceding report
16. Previous unpaid bills paid this period
17. Unpaid bills still unpaid from previous periods—Line 15 less Line 16
18. Unpaid bills incurred this period (Schedule 18)
19. Add Line 17 plus Line 18
20. Unpaid bills forgiven this period (Schedule 20)
21. Unpaid bills payable at end of period—Line 19 less Line 20

STATUS OF CONTRIBUTIONS

22. Contributions this period—from Line 2C
23. Contributions accumulated from previous periods—must be same as Line 24 of preceding report except that this line must be zero if this is the first financial report for this election campaign
24. Total contributions to date—Line 22 plus Line 23

STATUS OF CAMPAIGN COSTS

25. Campaign costs paid this period—from Line 5A _____ plus campaign costs via non-cash contributions this period—from Line 5B _____
26. Campaign payments accumulated for previous periods—must be same as Line 29 of preceding report except that this line must be zero if this is the first financial report for this election campaign
27. Add Line 25 plus Line 26
28. Campaign costs refunded this period—from Line 2F
29. Subtract—Line 27 less Line 28
30. Unpaid bills payable at end of period—from Line 21
31. Total campaign costs to date—Line 29 plus Line 30

ALLOCATION OF CAMPAIGN COSTS TO CANDIDATE(S)

This section need only be completed by a Committee in support of more than one Candidate

[illegible]

Statement period — from 1/15/86 to 7/15/86
Date Date

NON-CASH CONTRIBUTIONS

SCHEDULE 2B

DATE	FULL NAME	MAILING ADDRESS	PURPOSE OF PAYMENT OR DESCRIPTION OF ITEM	AMOUNT PAID OR VALUE OF ITEM
Campaign expenses paid by:				
Property given by:				
Services or facilities provided by:				
6/16/86	Morgan Guaranty Co.	23 Wall Street New York, N.Y. 10015	secretarial services, handling phone calls for fundraiser in N.Y.C. on 6/16/86	150.00
6/16/86	Packard Press	475 Park Avenue South New York, N.Y. 10016	postage and stationery	250.00
(FORGIVENESS OF LOANS OR UNPAID BILLS SHOULD NOT BE SHOWN ON THIS SCHEDULE—SEPARATE SCHEDULES ARE USED FOR SUCH TRANSACTIONS)				TOTAL 400.00

REFUNDS OF CAMPAIGN EXPENDITURES

SCHEDULE 2F

DATE RECEIVED	FULL NAME	MAILING ADDRESS	AMOUNT REFUNDED
TOTAL			0.00

OTHER RECEIPTS

SCHEDULE 2G

DATE RECEIVED	FULL NAME	MAILING ADDRESS	AMOUNT	TYPE OF RECEIPT
2/28/86	Chase Lincoln First	One Lincoln First Square Rochester, New York 14643	175.66	Int. CD Acct. #67005769
3/31/86	Chase Lincoln First	One Lincoln First Square Rochester, New York 14643	151.19	Int. CD Acct. #67005769
4/30/86	Chase Lincoln First	One Lincoln First Square Rochester, New York 14643	146.30	Int. CD Acct. #67005769
5/31/86	Chase Lincoln First	One Lincoln First Square Rochester, New York 14643	151.19	Int. CD Acct. #67005769
6/30/86	Chase Lincoln First	One Lincoln First Square Rochester, New York 14643	146.30	Int. CD Acct. #67005769
1-7/86	Key Bank	17 Court Street Buffalo, New York 14202	156.20	Int. Savings #530-007198
TOTAL			926.84	

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Statement period — from 1/15/86 to 7/15/86
Date Date

LOANS RECEIVED

SCHEDULE 2D

DATE RECEIVED	FULL NAME	MAILING ADDRESS	AMOUNT
---------------	-----------	-----------------	--------

SCHEDULE 2D — List any loans received during the reporting period. A copy of the evidence of indebtedness for each loan must be attached to the statement. If the loan was received from a lending institution, there must be included on the evidence of indebtedness the name and address of the obligor of the loan or any other person who endorses, co-signs, guarantees, or otherwise provides security for such loan. The name of this person should also be recorded on the schedule under the name of the lending institution.

(EVIDENCE OF INDEBTEDNESS FOR LOANS LISTED ABOVE MUST BE ATTACHED)			TOTAL 0.00

LOAN REPAYMENTS

SCHEDULE 3D

DATE PAID	FULL NAME	MAILING ADDRESS	AMOUNT	DATE OF LOAN
			TOTAL 0.00	

LOANS FORGIVEN

SCHEDULE 12

DATE FORGIVEN	FULL NAME	MAILING ADDRESS	AMOUNT	DATE OF LOAN
(EVIDENCE FROM LENDERS INDICATING FORGIVENESS MUST BE ATTACHED)			TOTAL	

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Statement period — from 1/15/86 to 7/15/86
Date Date

MONETARY CONTRIBUTIONS

SCHEDULE 2A

List all monetary contributions which exceed \$99. The date of receipt, full name and mailing address must be given. Do not report receipts from other political committees on this schedule.

Identify contributions from relatives or corporations by placing a check-mark in the appropriate column. For this purpose, a relative is the candidate's child, parent, grandparent, brother, sister, and the spouse of any of those.

It is not required that contributions of less than \$100 be individually listed. These contributors may be grouped together in a single amount and reported on the line provided in the summary section of this schedule. However, if a contributor in this period has contributed an amount, which when added to his previous contributions for this campaign now exceeds \$99, such contributor must now be individually listed.

For each listed contributor, who has made previous contributions to this campaign, show the total previous contributions in the box provided for this purpose.

DATE RECEIVED	Relative	Corp.	FULL NAME	MAILING ADDRESS	AMOUNT	PREVIOUS AMOUNTS -IF ANY
1/17/86			Morgan Companies New York PAC	23 Wall Street New York, New York 10015	200.00	
1/17/86			Stephen Zappia	20 York Street Buffalo, New York 14213	150.00	
2/6/86			Shearson Lehman Peter A. Avalone	World Financial Center New York, New York 10285	200.00	
2/26/86		X	Prudential Bache	4900 Merrick Road Massapequa Park, N.Y. 11762	500.00	
2/26/86			Edward C. Cosgrove	237 Main Street, Ste. 1000 Buffalo, New York 14202	1,000.00	
4/14/86		X	E.F. Hutton CO.	One Battery Park Plaza New York, New York 10004	500.00	
5/1/86			William J. Gillard	52 Brush Hill Rd. Kinnelon, N.J. 07405	1,000.00	
5/2/86			Stephen D. Goddard	333 South Grand, Suite 2400 Los Angeles, Cal. 90071	1,000.00	
5/2/86			Robert F. Goldhammer	74 Arlington Street Winchester, VA. 01890	1,000.00	
5/17/86			Peter D. Goodson	52 Prescott Avenue Bronxville, New York 10706	1,000.00	
4/30/86			A. H. Gordon	10 Gracie Square New York, New York 10028	1,000.00	
4/7/86			David M. McAuliffe	736 Mildred Street Teaneck, N.J. 07666	300.00	
4/16/86			Paul A. Maffeo	2600 Seattle First Bldg. Seattle, Washington 98154	300.00	
6/9/86			William P. Maloney	New York, New York	300.00	
4/12/86			Richard C. Makin	New York, New York	300.00	
3/21/86			John A. McColl	5942 Henley Drive San Diego, Cal. 92120	300.00	
3/24/86			Joseph W. Martin, Jr.	2 Hesketh Court Menlo Park, CA. 94025	300.00	
4/1/86			Kenneth C. Markley	1225 Carriage Lane La Grange, IL. 60525	300.00	
5/12/86			Joseph P. Markey	472 Tenth Street Brooklyn, New York 11215	300.00	
Sub- TOTAL					9,950.00	

SUMMARY (To be completed on last page of schedule 2A)

Total unitemized contributions this period _____

Total itemized contributions this period — all pages _____

Total contributions received this period _____

DO NOT COMPLETE UNLESS THIS IS LAST CONTRIBUTION PAGE

One

Statement period — from 1/15/86
 Date

7/15/86
 Date

MONETARY CONTRIBUTIONS
SCHEDULE 2A

DATE RECEIVED	Relative	Corp.	FULL NAME	MAILING ADDRESS	AMOUNT	PREVIOUS AMOUNTS -IF ANY
4/29/86			Peter G. Mastrangelo	New York, New York	300.00	
3/24/86			Carter C. Mathies	1245 S.W. 84th Avenue Portland, Oregon 97225	300.00	
3/24/86			Joseph P. Martorella	81 Lahey Street New Hyde Park, New York 11040	300.00	
3/30/86			Bernard C. Grigsby, II	P.O. Box 645, Wall St. Station New York, New York 10005	700.00	
3/31/86			T. G. Carbonar	12115 San Vicente Blvd. West Los Angeles, CA. 90049	700.00	
6/3/86			Raymond Matison	127 Ralston Avenue South Orange, N.J. 07079	300.00	
6/16/86			Sandra Mokuvus Bellush	c/o Chemical Bank, 380 Madison Ave., N.Y., N.Y. 10017	200.00	
6/16/86			George Borris, Frank Soltis & Greg Hickock	c/o Chase PAC, 1 Chase Man- hattan Plaza, N.Y., N.Y. 10081	600.00	
6/16/86			Robert F. Grimmig	New York, New York	200.00	
6/16/86			Maurice Sonnenberg	New York, New York	200.00	
6/16/86			William N. Hudson, Jr.	4985 Sheridan Drive Williamsville, N.Y. 14221	200.00	
6/13/86			Stephen Kohlmann	26 Cedar Avenue Coram, New York 11727	100.00	
6/10/86			Raymond V. DiScala	24 Harbor Hill Drive Lloyd Harbor, N.Y. 11743	100.00	
6/12/86		X	First Albany Corp.	41 State St., P.O. Box 52 Albany, N.Y. 12201	200.00	
6/17/86			Larry R. Hammond	167c New Freedom Berlin, N.J. 08009	200.00	
6/16/86			John K. Dierkes	285 Riverside Drive, 13C New York, New York 10025	200.00	
6/16/86			Amos T. Beason	26 Ox Bow Lane Summit, N.J. 07901	200.00	
6/16/86		X	I.D.B.I. Managers, Inc.	175 Water Street New York, New York 10038	200.00	
6/16/86			Dillon Read Political Action Committee	19 Rector Street, 8th Floor New York, New York 10006	400.00	
6/11/86		X	Rogers & Wells, P.C.	200 Park Avenue New York, New York 10166	400.00	
6/5/86			Robert B. Nolan, Jr.	20 Park Avenue Bronxville, N.Y. 10708	100.00	
6/16/86		X	United Daniels Securities, Inc.	170 Broadway, Suite 1200 New York, New York 10038	400.00	
Sub - TOTAL					16,450.00	

SUMMARY (To be completed on last page of schedule 2A)

Total unitemized contributions this period

Total itemized contributions this period — all pages

Total contributions received this period

DO NOT COMPLETE UNLESS THIS IS LAST CONTRIBUTION PAGE

Statement period — from 1/15/86 to 7/15/86
Date Date

MONETARY CONTRIBUTIONS

DATE RECEIVED	Relative	Corp.	FULL NAME	MAILING ADDRESS	AMOUNT	PREVIOUS AMOUNTS -IF ANY
6/12/86			Committee for Effective Government	Morgan PAC New York, New York	500.00	
6/11/86			Walter T. Kicinski	32 Woodhollow Road Lawrenceville, N.J. 08648	200.00	
6/16/86			John Maus	42 W. 87th Street, No. 48 New York, New York 10024	100.00	
6/14/86			Courtney A. Haff	16 Hudson Street New York, New York 10013	200.00	
6/10/86			Bernard R. Bober	16 Colts Foot Glen Road Saddle River, N.J. 07458	250.00	
6/10/86			Charyl E. Jones	215 West 91 Street, Apt. 64 New York, New York 10024	200.00	
6/3/86			Chester J. Straub	One Citicorp Center, 153 E. 53rd St., N.Y., N.Y. 10022	200.00	
6/16/86			William Pinakiewicz	249 Kimball Avenue Westfield, N.J. 07090	800.00	
6/16/86			Jeremiah C. Whalen	503 Seabrook Drive Williamsville, N.Y. 14221	200.00	
6/9/86			Burt R. Ehrlich	80 Pine Street New York, New York 10005	250.00	
6/17/86			Gedale Bob Horowitz	One New York Plaza New York, New York 10004	400.00	
6/16/86			Nelson D. Civello	140 Broadway New York, New York	200.00	
6/18/86			Ronald E. Curvin	140 Broadway New York, New York	200.00	
6/9/86			John H. Dyson	c/o Wakefield National, Inc. 2 Park Ave., N.Y., N.Y. 10016	500.00	
Miscellaneous contributions					140.00	
6/11/86			J. Chester Johnson	32 Woodhollow Road Lawrenceville, N.J. 08648	200.00	
6/23/86	X		Brown & Wood, P.C.	One World Trade Center New York, New York 10048	500.00	
TOTAL					21,490.00	

SUMMARY (To be completed on last page of schedule 2A)

Total unitemized contributions this period

140.00

Total itemized contributions this period — all pages

21,350.00

Total contributions received this period

21,490.00

DO NOT COMPLETE UNLESS THIS IS LAST CONTRIBUTION PAGE

95040522203

Statement period — from 1/15/86 to 7/15/86
Date Date

CAMPAIGN EXPENSES PAID

SCHEDULE 5A

DATE PAID	FULL NAME	MAILING ADDRESS	AMOUNT	PURPOSE OF DISBURSEMENT
1/22/86	Amherst Democratic Committee	333 Dick Road Depew, New York 14043	10.00	raffle tickets
1/24/86	Accurate Campaign Lists	3997 Genesee Street Cheektowaga, New York 14225	250.00	contribution lists
1/24/86	Wiechec's Social Club	1748 Clinton Street Buffalo, New York	65.00	4 pg. ad program
1/24/86	Sunrise Press	574 Fillmore Avenue Buffalo, New York 14212	211.60	printing of tickets
1/27/86	Mercy Hospital Foundation	565 Abbott Road Buffalo, New York 14220	100.00	2 tickets
1/27/86	The Cane Fund	Grand Island, New York	500.00	donation
1/30/86	Blackthorns	245 Abbott Road Buffalo, New York 14220	15.00	1986 annual dues
1/30/86	Friends of Sheriff Tom F. Higgins	56 Mumford Avenue Buffalo, New York 14220	50.00	advertising
1/30/86	Cynthia A. Wojtanik	76 Wood Street Lackawanna, New York 14218	75.00	secretarial services, Jan.
1/31/86	New Democratic Coalition	New York, New York	100.00	1 ticket
2/4/86	U.S. Postmaster	Niagara Square Station Buffalo, New York 14202	44.00	2 rolls of stamps
2/4/86	N.Y. Telephone Co.	1600 Rand Building Buffalo, New York 14203	91.16	car phone 1/25 - 2/24
2/6/86	Robert E. Whelan	1111 Amherst Street Buffalo, New York 14216	265.00	Jan. out-of-pocket exp.
2/6/86	Kathy Gregorie	156 Weyand Street Buffalo, New York 14210	37.80	reimbursement scrapbook
2/10/86	Amherst Gaelic League	5707 Main Street Williamsville, New York 14221	120.00	10 tickets
2/14/86	Bishop Timon High School	601 McKinley Parkway Buffalo, New York 14220	25.00	4 page - advertising
2/21/86	Easter Seal Society	974 Kenmore Avenue Buffalo, New York 14216	50.00	5 tickets
2/21/86	U.S. Postmaster	Niagara Square Station Buffalo, New York 14202	66.00	3 rolls stamps
2/26/86	Larry Goldberg	Buffalo, New York	65.00	reimbursement St. Pat cards
2/28/86	Cynthia A. Wojtanik	76 Wood Street Lackawanna, New York 14218	75.00	secretarial services - Feb.
2/29/86	Benefit for Tom & Jane O'Malley	245 Abbott Road Buffalo, New York 14220	60.00	4 tickets
2/28/86	The Hyatt Regency	2 Fountain Plaza Buffalo, New York 14202	270.60	luncheon meeting 2/25
3/4/86	Forum Restaurant	Buffalo, New York	21.74	breakfast meeting 3/4
3/5/86	Robert E. Whelan	1111 Amherst Street Buffalo, New York 14216	215.00	out-of-pocket exp. - Feb.
3/11/86	Internal Revenue Service	Lowell Street Andover, Mass.	30.00	payment of 1120 POL tax
3/12/86	Vilardo Printing	326 Connecticut Street Buffalo, New York 14213	653.40	letterhead & stationery
Sub - TOTAL			3,466.30	

Statement period — from 1/15/86 to 7/15/86
Date Date

CAMPAIGN EXPENSES PAID

SCHEDULE 3A

DATE PAID	FULL NAME	MAILING ADDRESS	AMOUNT	PURPOSE OF DISBURSEMENT
DO NOT report Transfers Out, use Schedule SE				
3/24/86	Buffalo Telephone Co.	1600 Rand Building Buffalo, New York 14203	85.48	car phone 2 mcs.
3/31/86	Erie County Committee Conservative Party N.Y.	263 Statler Building Buffalo, New York 14202	80.00	2 tickets
3/31/86	Cynthia A. Wojtanik	76 Wood Street Lackawanna, New York 14218	75.00	secretarial services - Ma
3/31/86	Erie County Committee - Conservative Party N.Y.	263 Statler Building Buffalo, New York 14202	45.00	1/2 pg. ad
3/31/86	Zone 16 Democratic Comm.	232 E. Amherst Street Buffalo, New York 14214	5.00	5 raffle tickets
4/7/86	Robert E. Whelan	1111 Amherst Street Buffalo, New York 14215	205.00	Mar. out of pocket expen.
4/7/86	University District Democratic Club	163 Marth Avenue Buffalo, New York 14215	12.00	2 tickets
4/7/86	University District Democratic Club	163 Marth Avenue Buffalo, New York 14215	15.00	1/2 pg. ad
4/8/86	Committee to Re-Elect Joanne L. Skorka	546 Richmond Avenue Buffalo, New York 14222	20.00	1 ticket
4/8/86	Trocaine College	110 Red Jacket Parkway Buffalo, New York 14220	35.00	1 ticket
4/14/86	Frontier Democratic Club	210 Voorhees Avenue Buffalo, New York 14214	25.00	1/2 page ad
4/14/86	Community Action Organi- zation of Erie Co.	70 Harvard Place Buffalo, New York 14209	18.50	1/8 pg. ad
4/14/86	Buffalo-Dortmund Sister City Committee	91 Pine Street East Aurora, N.Y. 14052	15.00	3 tickets
4/15/86	U.S. Postmaster	Niagara Square Buffalo, New York 14202	88.00	4 rolls of stamps
4/18/86	Greater Buffalo Demo- cratic Women's Club	9040 Main Street Clarence, New York 14031	24.00	2 tickets
4/18/86	Frontier Democratic Club	24 Ross Avenue Buffalo, New York 14207	40.00	2 tickets
4/23/86	North Buffalo Jaycees	P.O. Box 252 Buffalo, New York 14216	15.00	1/2 pg. ad
4/23/86	Hillery Memorial Scholarship Foundation	601 McKinley Parkway Buffalo, New York 14220	10.00	honorary patron ad
4/30/86	W.N.Y. Chapter of Arthritis Foundation	Niagara Falls Blvd. Tonawanda, New York 14150	250.00	donation
5/1/86	Ronald McDonald House of Buffalo	780 West Ferry Street Buffalo, New York 14222	50.00	special patron ad
5/1/86	Mercy Hospital Men's Sustaining Society	565 Abbott Road Buffalo, New York 14220	20.00	membership due & 3 raffle tck
5/6/86	Robert E. Whelan	1111 Amherst Street Buffalo, New York 14216	270.00	out-of-pocket expenses-April
Sub -TOTAL			4,869.28	

SUMMARY (To be completed on last page of schedule 3A)

Total unitemized expenses this period _____

Total itemized expenses this period — all pages _____

Total campaign expenses expended this period _____

DO NOT COMPLETE UNLESS THIS IS LAST CAMPAIGN EXPENSE PAGE

Statement period — from 1/15/86 to 7/15/86
Date Date

CAMPAIGN EXPENSES PAID

SCHEDULE 5A

DATE PAID	FULL NAME	MAILING ADDRESS	AMOUNT	PURPOSE OF DISBURSEMENT
DO NOT report Transfers Out, use Schedule 5E				
5/7/86	Erie County Democratic Town Chairmen's Assoc.	87 Clark Street Orchard Park, N.Y. 14127	20.00	1 ticket
5/7/86	W.N.Y. Chapter of Arthritis Foundation	Niagara Falls Blvd. Tonawanda, New York 14150	80.00	1 ticket
5/19/86	Puerto-Rican American Community Association	110 Hartwell Road Buffalo, New York 14216	25.00	4 pg. ad
5/20/86	Preservation Coalition of Erie County	20 Angle Street Buffalo, New York 14214	15.00	membership dues
5/22/86	Lotus Club	5 East 66th Street New York, New York 10021	500.00	deposit for room-fundrais in N.Y.C. on 6/16/86
5/28/86	Cynthia A. Wojtanik	76 Wood Street Lackawanna, New York 14218	150.00	secretarial services, Apr
5/28/86	Inner City Concerned Citizens	56 North Parade Avenue Buffalo, New York 14211	25.00	1 ticket
5/28/86	Frontier Democratic Club	24 Ross Avenue Buffalo, New York 14207	15.00	membership dues
5/29/86	Robert E. Whelan	1111 Amherst Street Buffalo, New York 14216	370.00	out-of-pocket expenses, May
5/30/86	Women's Division of Erie Co. Democratic Committee	220 Delaware Avenue, #425 Buffalo, New York 14202	20.00	4 pg. ad
5/30/86	Citizens for Hoyt	Buffalo, New York	30.00	1 ticket
6/5/86	Committee to Re-Elect Mazurek	1202 Broadway Buffalo, New York 14212	40.00	2 tickets
6/5/86	Erie ARC	Buffalo, New York	25.00	contribution Walkathon 6/7
6/6/86	U.S. Air	Greater Bflo. Int. Airport Cheektowaga, N.Y. 14225	672.00	Airfare for committee for fundraiser in N.Y.C. 6/16
6/9/86	U.S. Postmaster	Niagara Square Station Buffalo, New York 14202	44.00	2 rolls stamps
6/9/86	Nicholas Sargent	15 Court Street Buffalo, New York 14202	49.00	reimbursement; expenses for fundraiser 6/1
6/17/86	Robert E. Whelan	1111 Amherst Street Buffalo, New York 14216	620.00	reimbursement; for hotel, transportation N.Y.C. fundrai
6/17/86	Lotus Club	5 East 66th Street New York, New York 10021	935.00	balance due 6 N.Y.C. fundrai
Sub -TOTAL			8,504.28	

SUMMARY (To be completed on last page of schedule 5A)

Total unitemized expenses this period _____

Total itemized expenses this period — all pages _____

Total campaign expenses expended this period _____

DO NOT COMPLETE UNLESS THIS IS LAST CAMPAIGN EXPENSE PAGE

8504062302

BOARD OF ELECTIONS
ERIE COUNTY, N.Y.

Jun 4 4 55 PM '86

FRIENDS OF BOB WHELAN
c/o 700 Cathedral Park Tower
37 Franklin Street
Buffalo, New York 14202

May 30, 1986

Democratic Headquarters
Erie County Board of Elections
134 West Eagle Street
Buffalo, New York 14202

RE: FRIENDS OF BOB WHELAN

Dear Sirs:

Per your instructions in Paragraph "A" of Campaign Finance Guide for Candidates and Political Committees, please be advised that five contributions in the amount of \$1,000 each have been received by our committee, which are as follows:

1) William J. or Dorothy D. Gillard	\$1,000.00
2) Stephen D. and Deborah G. Goddard	1,000.00
3) Robert F. Goldhammer	1,000.00
4) Peter D. and Terry D. Goodson	1,000.00
5) A. H. Gordon	1,000.00

I have enclosed photocopies of those checks.

If any additional information is requested, please do not hesitate to contact me.

Very truly yours,

FRIENDS OF BOB WHELAN

Cynthia A. Wojtanik

By

Cynthia A. Wojtanik

CW
Enclosure

95040522304

8 5 0 4 0 3 2 2 3 0 5

No. 3657

A. H. GORDON
10 Grace Square
New York, NY 10028

April 30 19 36

PAY TO THE ORDER OF Friends of Bob Whelan \$1,000.00

One Thousand and no/100 DOLL.

THE BANK OF NEW YORK
60 WALL STREET, NEW YORK, N.Y. 10005

Attn

⑆015576⑆ ⑆0210000181⑆ ⑆24 8606⑆

WILLIAM J. OR DOROTHY D. GILLARD
32 BRUSH HILL RD. PH. 201-480-2488
KINNELON, NJ 07405

2207

Pay to the Order of Friends of Bob Whelan \$1,000- DOLL.

One Thousand

U.S. Trust UNITED STATES TRUST CO. OF NEW YORK
46 Wall Street
New York, N.Y. 10005

Date 5/1 1986

Kathleen Gillard

⑆0210013181⑆ 61 4065 31⑆ 2207

STEPHEN D. GODDARD
DEBORAH GODDARD
333 SOUTH GRAND, SUITE 2400
LOS ANGELES, CA 90071

316

May 2 1986

PAY TO THE ORDER OF Friends of Bob Whelan \$1000 CC/100

One Thousand and no/100 DOLLAR

BANK ONE. ⑆
BANK ONE OF COLUMBUS, MA
Columbus, Ohio 43271

Stephen D. Goddard

⑆044000804⑆ 4229052034⑆ 0316

85040522306

ROBERT F. GOLDHAMMER
74 Arlington Street
Winchester, MA 01890

2666

PAY TO THE ORDER OF

Frank J. Goldhammer 1986
Five Thousand and no DOLLAR

 BANK OF NEW ENGLAND NA
BOSTON, MASSACHUSETTS

Memo:

Robert F. Goldhammer

⑆016000138⑆ 1168 3828 2666

PETER D. GOODSON
TERRY D. GOODSON
32 PRESCOTT AVE.
BRONXVILLE, NY 10708

5553

Pay to the
Order of

Frank J. Goldhammer Date May 17, 1986
One Thousand and no DOLLAR

U.S. Trust

UNITED STATES TRUST CO.
OF NEW YORK
48 Wall Street
New York, N.Y. 10005

Memo:

Peter D. Goodson

⑆021001318⑆ 610325 5553

PRELIMINARY OFFICIAL STATEMENT DATED AUGUST 5, 1986

NEW ISSUES

Ratings: See "Ratings" herein

In the opinion of Bond Counsel, interest on the Bonds is exempt, under existing statutes, from federal income taxes and, under existing statutes, interest on the Bonds is exempt from personal income taxes of New York State and its political subdivisions, including The City of New York. For information regarding certain legislation which may affect the exemption of interest on the Bonds from federal income taxation, see "Pending Federal Tax Legislation", herein.

\$55,424,000***City of Buffalo, New York**

Dated: August 1, 1986

Due: February 1, as shown below

**\$40,684,000 General Improvement Serial Bonds—1986-D and
\$2,390,000 General Improvement Water Supply Serial Bonds—1986-F**

Series D Amount	Series F Amount	Maturity	Interest Rate	Price	Series D Amount	Maturity	Interest Rate	Price
\$ 300,000		1987	%	%	\$1,160,000	2003		
1,714,000	\$160,000	1988			1,160,000	2004		
1,710,000	160,000	1989			1,185,000	2005		
1,725,000	160,000	1990			1,205,000	2006		
1,900,000	160,000	1991			705,000	2007		
1,860,000	135,000	1992			705,000	2008		
1,920,000	135,000	1993			705,000	2009		
1,965,000	135,000	1994			730,000	2010		
2,010,000	155,000	1995			750,000	2011		
2,115,000	155,000	1996			750,000	2012		
2,065,000	155,000	1997			750,000	2013		
2,100,000	165,000	1998			775,000	2014		
2,115,000	175,000	1999			775,000	2015		
2,070,000	180,000	2000			775,000	2016		
1,680,000	180,000	2001						
1,305,000	180,000	2002						

\$12,350,000 School Serial Bonds—1986-E

Amount	Maturity	Interest Rate	Price	Amount	Maturity	Interest Rate	Price
\$ 535,000	1988	%	%	\$ 600,000	1998	%	%
535,000	1989			600,000	1999		
535,000	1990			600,000	2000		
535,000	1991			600,000	2001		
580,000	1992			600,000	2002		
590,000	1993			680,000	2003		
660,000	1994			680,000	2004		
660,000	1995			680,000	2005		
660,000	1996			680,000	2006		
660,000	1997			680,000	2007		

Accrued Interest to be added

The Bonds will be issued in fully registered form in denominations of \$5,000 or any integral multiple thereof for any single maturity, except that one bond for the 1988 maturity of the General Improvement Serial Bonds-1986-D may be issued in a denomination which is or includes an amount less than the authorized multiple. Principal, when due, will be payable at the principal corporate trust office of The Chase Manhattan Bank, N.A., New York, New York, the Fiscal Agent for the Bonds. Interest on the Bonds will be payable on February 1, 1987, August 1, 1987 and semi-annually thereafter on February 1 and August 1 in each year to maturity. Such interest is payable by check mailed on each such interest payment date to the registered owner at his address as shown on the registration books of the Fiscal Agent as of the fifteenth day of the month next preceding each such interest payment date. The Bonds maturing in the years 1987 through 1996 are not subject to prior redemption. The Bonds maturing in 1997 and thereafter are redeemable at the option of the City on February 1, 1996, and thereafter on any interest payment date at declining redemption prices not exceeding 101%, as described herein.

The Bonds will constitute general obligations of the City and will contain a pledge of its faith and credit for the payment of the principal of and interest on the Bonds and all the taxable real property within the City is subject to the levy of ad valorem taxes, without limitation as to rate or amount, for such purpose.

The Bonds are offered when, as and if issued and received by the Underwriters and subject to the final approving opinion of Hawkins, Delafield & Wood, Bond Counsel, New York, New York and certain other conditions.

Certain legal matters will be passed upon for the Underwriters by Rogers & Wells, New York, New York. It is expected that delivery of the Bonds in definitive form will be made on or after August 27, 1986, in New York, New York.

Shearson Lehman Brothers Inc.**The First Boston Corporation****E.F. Hutton & Company Inc.****Marine Midland Bank, N.A.****Dillon, Read & Co. Inc.****PaineWebber
Incorporated****Kidder, Peabody & Co.
Incorporated**

August 1, 1986

* Preliminary, subject to change

EXHIBIT "2"

This Preliminary Official Statement and the information contained herein are subject to completion, amendment or other change without any notice. The securities described herein may not be sold nor may offers to buy be accepted prior to the time the Official Statement is delivered in final form. Under no circumstances shall this Preliminary Official Statement constitute an offer to sell or the solicitation of an offer to buy nor shall there be any sale of these securities in any jurisdiction in which such offer, solicitation or sale would be unlawful prior to registration or qualification under the applicable securities laws of any such jurisdiction.

UNDERWRITING

The Bonds are being purchased for reoffering by the Underwriters set forth on the cover page hereof, for whom Shearson Lehman Brothers Inc. is acting as Managing Underwriter, at an aggregate purchase price for the Bonds of \$ _____ plus accrued interest. The aggregate initial offering price for the Bonds will be \$ _____ plus accrued interest. The Contract of Purchase provides that the Underwriters will purchase all of the Bonds if any Bonds are purchased.

The Underwriters may offer and sell Bonds to certain dealers and others at prices other than the initial offering prices. The offering prices may be changed from time to time by the Underwriters.

ADDITIONAL INFORMATION

The Official Statement is not to be construed as a contract or agreement between the City and the purchasers or holders of any of the Bonds. Any statements made in this Official Statement involving matters of opinion, whether or not expressly so stated, are intended merely as an opinion and not as representations of fact. The information and expressions of opinion herein are subject to change without notice and neither the delivery of this Official Statement nor any sale made hereunder shall, under any circumstances, create any implication that there has been no change in affairs in the City since the date hereof.

Morgan Guaranty Trust Company of New York has served as financial advisor to the City of Buffalo in certain matters with respect to the sale of the Bonds.

Additional information may be obtained upon request from the office of the City Comptroller, Robert E. Whelan, Room 1225 City Hall, Buffalo, New York 14202 (716-855-5255) or from Frances L. Miley, Morgan Guaranty Trust Company, 10th Floor, 15 Broad Street, New York, New York 10015, (212) 483-7272.

The execution of this Official Statement and its delivery have been duly authorized by the Comptroller.

CITY OF BUFFALO

August , 1986

By: _____
ROBERT E. WHELAN, *Comptroller*

Whelan Used City-Tied Bank To Raise Funds

By GEORGE BORRELLI
News Political Reporter

Buffalo Comptroller Robert E. Whelan, who has called for strict enforcement of codes of ethics for public officials, used a bank that does business with the city to help arrange a fund-raiser held for him last month.

Whelan said Tuesday the bank, Morgan Guaranty Trust Co. of New York City, accepted some telephone reservations for his \$200-a-ticket fund-raiser held June 16 in the Lotus Club in Manhattan.

But Whelan insisted there was "no conflict of interest, nothing improper" in the role played by the bank, which serves as financial adviser to Buffalo in the sale of bonds and revenue notes.

However, Richard Planavsky, commissioner of administration and finance in the administration of Mayor Griffin, disagreed.

Planavsky, who unsuccessfully challenged Whelan in the Democratic primary for city comptroller in 1983, said the bank's role in the fund-raiser poses "serious questions of propriety," since the power to hire the bank as financial adviser to the city rests solely with Whelan.

He noted that Whelan recently recommended the creation of the Ethics in Government and Elections Committee of Erie County to enforce a code of ethics for all elected officials in the county.

"If the committee is formed, I think it would be appropriate for the panel to look into this kind of activity," said Planavsky of the Whelan fund-raiser.

Whelan said in a press release issued Monday that the fund-raiser had "brought together 40 to 50 personal friends and business associates" to help celebrate his birthday and "assist his future political activities."

The party netted about \$2,000, according to Whelan, whose political options for 1987 include running for re-election or for Erie County executive.

Invitations for the fund-raiser were sent out by the New York Friends of Robert E. Whelan. The committee listed an RSVP telephone number in the Public Finance Section of Morgan Guaranty Trust Co.

Whelan said the service was provided by the bank as a courtesy and would be reported on his financial disclosure statement as an "in-kind contribution" valued at about \$150.

The bank had no role of any consequence, asserted Whelan, who said three employees of the bank attended his fund-raiser on a combined contribution of \$300.

Whelan said he has been in the forefront of efforts to reform election campaign laws, especially in the area of expenditures, which he wants curtailed, and in the amount of contributions, which he wants limited to \$1,000 from individuals and \$2,000 from corporations.

The comptroller said he gives no credence to Planavsky's suggestions of a possible conflict, asserting:

"Mr. Planavsky doesn't have the facts and is re-living the defeat he suffered three years ago."

Attachment 2

DAVIS POLK & WARDWELL

1575 I STREET, N. W.

WASHINGTON, D. C. 20005

202-789-7100

TELEX: ITT-440889

TELEGRAM: 202-789-7129

WRITER'S DIRECT NUMBER:

1 CHASE MANHATTAN PLAZA, NEW YORK, N. Y. 10005
TELEPHONE: 212-530-4000

400 PARK AVENUE, NEW YORK, N. Y. 10022
TELEPHONE: 212-530-4000

4, PLACE DE LA CONCORDE, 75008 PARIS
TELEPHONE: (1) 48. 66. 14. 01

1 FREDERICK'S PLACE, LONDON EC2R 8AB
TELEPHONE: 01-726 6250

October 14, 1986

Re: MUR 2248

Charles N. Steele, Esq.
Lawrence M. Noble, Esq.
Federal Election Commission
Washington, D.C. 20463

Dear Sirs:

As indicated by the enclosed Statement of Designation of Counsel, we are acting as counsel to Morgan Guaranty Trust Company of New York ("MGT") in connection with the above referenced matter and, in that capacity, write this letter in response to the complaint filed by Richard Planavsky against MGT. The complaint is plainly deficient because MGT is not a national bank and the complaint and its attachments indicate that the alleged contributions relate to either local or county elections, not federal elections. MGT is simply not in violation of the provision cited by Mr. Planavsky or any other provision of the federal election campaign laws.

Mr. Planavsky states as follows in his affidavit: "Upon information and belief . . . Morgan Guaranty Trust Company, is a bank or corporation subject to the provisions of Chapter 14 of Title 2 of the United States Code." He further states that MGT acted as financial advisor to the City of Buffalo in matters relating to the sale of bonds and notes and also contributed things of value to a political committee organized to support Mr. Robert Whelan, the Comptroller of the City of Buffalo. Mr. Planavsky states that such contribution to the Whelan political committee by MGT constituted a violation of Section 316 of the Federal Election Campaign Act of 1971, as amended (the "FECA"), 2 U.S.C.A. § 441b (1985), "and of other applicable provisions."

97: 2110

Charles N. Steele, Esq.
Lawrence M. Noble, Esq.

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October 14, 1986

There is only one provision of the FECA that could apply to the alleged contribution at issue in Mr. Planavsky's complaint, Section 316(a), 2 U.S.C.A. § 441b(a) (1985), which reads:

(a) It is unlawful for any national bank, or any corporation organized by authority of any law of Congress, to make a contribution or expenditure in connection with any election to any political office, or in connection with any primary election or political convention or caucus held to select candidates for any political office, or for any corporation whatever, or any labor organization, to make a contribution or expenditure in connection with any election at which presidential and vice presidential electors or a Senator or Representative in, or a Delegate or Resident Commissioner to, Congress are to be voted for, or in connection with any primary election or political convention or caucus held to select candidates for any of the foregoing offices "

The section creates a dual prohibition. First, national banks and other corporations organized under federal law are prohibited from making contributions or expenditures in connection with any election whatsoever. Second, all corporations are prohibited from making contributions or expenditures in connection with elections to federal office. This interpretation of the section is confirmed by the regulations issued by the Federal Election Commission which clearly distinguish between the prohibition imposed on national banks and federally chartered corporations and the narrower prohibition imposed on other corporations. Compare 11 C.F.R. § 114.2(a) (1986) with 11 C.F.R. § 114.2(b) (1986).

Even assuming that MGT made a payment constituting a "contribution" or an "expenditure" (an issue which MGT does not concede), it is not possible for MGT to be in violation of the first branch of Section 316(a) because MGT is neither a "national bank nor a corporation organized by authority of any law of Congress." MGT is a state-chartered trust company and has been ever since its predecessor was organized in 1864 as "New York Guaranty & Indemnity Co." Indeed, its name alone, "Morgan Guaranty Trust Company of New York," is proof that it is not a national bank, because a national bank must

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Charles N. Steele, Esq.
Lawrence M. Noble, Esq.

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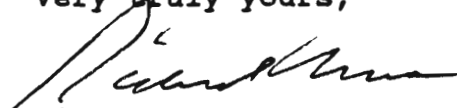
October 14, 1986

have the word "national" as part of its official name.
12 U.S.C.A. § 22 (Supp. 1986). As evidence of MGT's official
name and status as a state-chartered trust company, an
excerpt from Moody's Bank & Finance Manual is attached
hereto.

Neither can the acts allegedly committed by MGT
constitute a violation of the second branch of Section
316(a). Even if the allegations of Mr. Planavsky's complaint
were accepted as true, those allegations pertain only to the
solicitation of funds for a political committee called
Friends of Bob Whelan. Mr. Whelan is the present Comptroller
of the City of Buffalo and there is no indication anywhere in
Mr. Planavsky's complaint that Friends of Bob Whelan has or
intends to have any connection with any federal election
whatsoever. In fact, the newspaper article attached by
Mr. Planavsky to his complaint states that Mr. Whelan's
"political options for 1987 include running for re-election
or for Erie County executive." As the above discussion makes
clear, the prohibition imposed by Section 316(a) of the FECA
on corporations other than national banks and federally
chartered corporations applies only to elections to federal
office and not to state or local elections.

No action by the Commission is warranted because
there has been no violation of the federal election campaign
laws.

Very truly yours,



Richard Moe

Attachment

cc: Richard Planavsky
Commissioner of Administration
and Finance of the City of Buffalo
Room 203
City Hall
Buffalo, New York 14202

85040622312

1986
VOL. 1

BANKS • TRUST COMPANIES
SAVINGS & LOAN ASSOCIATIONS
FEDERAL CREDIT AGENCIES

MOODY'S.

BANK & FINANCE MANUAL

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MORGAN GUARANTY TRUST CO. OF NEW YORK

(Controlled by J.P. Morgan & Co. Incorporated)
Incorporated in New York April 13, 1864, as New York Guaranty & Indemnity Co., name changed to Guaranty Trust Co. of New York Jan. 1, 1890; present name adopted Apr. 24, 1910 on merger with J.P. Morgan & Co., Inc. see below.

On Jan. 27, 1910 the Morton Trust Co. which in 1900 absorbed the State Trust Co. on a share for share basis, and the Fifth Avenue Trust Co. were merged with the Guaranty Trust Co. On Oct. 16, 1912, Standard Trust Co. of New York was merged. On May 6, 1919, merged Bank of Commerce in New York, formerly National Bank of Commerce in New York (chartered in 1853 originally incorporated in 1839).

On Apr. 24, 1939 merged with J.P. Morgan & Co., Inc., incorporated Mar. 21, 1940 under New York State banking law as successor to partnership of J.P. Morgan & Co. (originally established in 1861). Commenced business under new designation on Apr. 1, 1940. Under merger plan Morgan stockholders received 4 1/2 shares for each share held. Guaranty Trust stock was exchanged share for share.

In Nov. 1979, Morgan Guaranty International Finance Corp., a subsidiary of The Morgan Bank acquired 20% interest in Inversiones Finaiven S.A. of Venezuela for an undisclosed amount. Morgan announced it also plans to sell its 20% interest in Sociedad Financiera Valunvenca, a Venezuelan investment bank to Inversiones.

In May 1981, sold 29.32% interest in Morgan Grenfell Holdings Ltd.

Divisions: Banking, Financial and Information Systems Operations, Treasurer's Private Banking, and Administration.

Member of Federal Reserve System and Federal Deposit Insurance Corp.

Operates four banking offices in New York, and one each in Antwerp, Brussels, Buenos Aires, Frankfurt, Hong Kong, London, Madrid, Milan, Nassau, Paris, Rome, St. Helier, Seoul, Singapore, Taipei, Tokyo and Zurich.

Also has representative offices in Beirut, Caracas, Jakarta, Kuala Lumpur, Los Angeles, Manila, Melbourne, Mexico City, San Francisco, Sao Paulo and Sydney.

Also has a regional office in Tokyo.

Subsidiaries:

Wholly owned:

J.P. Morgan Interfunding Corp. Manages a portfolio of capital equipment leases and intermediate-term loans.

Morprop Incorporated. Holds real estate acquired in connection with loans.

Morgan Guaranty International Bank with offices in Miami, Houston, San Francisco, Los Angeles and Nassau. "Edge Act" bank, headquartered in Miami, performing international services for clients in the United States and abroad.

Morgan Trust Company of the Cayman Islands. Cayman Ltd. subsidiary of Morgan Guaranty International Bank, providing international services for clients.

Morgan Trust Company of The Bahamas Limited. Provides international banking and trust services for clients.

Morgan Guaranty International Finance Corp. "Edge Act" company holding interests in overseas banks, investment firms, and other businesses.

J.P. Morgan Overseas Capital Corp. Incorporated in Delaware to finance overseas activities with funds raised in international capital markets.

Morgan Bank of Canada, Toronto. Chartered bank—accepts deposits and makes loans in local and foreign currencies.

J.P. Morgan (Suissse) S.A., Geneva, provides banking services, including investment management for individuals.

J.P. Morgan Investment Management Pacific Limited. Markets international investment services, manages portfolios, and conducts regional investment research.

Morgan Bank Nederland N.V., Amsterdam. Merchant bank.

Morgan & Cie S.A., Paris. Merchant bank.

Morgan Guaranty Finance Ltd., Hamilton, Bermuda. Euro-dollar investment facility.

Morgan Guaranty Pacific Limited. Merchant bank.

Morgan Guaranty S.A.E., Madrid. Merchant bank.

Morgan Guaranty (Switzerland) Ltd. Zurich. Finance company; also engages in underwritings.

Morgan International Finance (Italy) S.p.A., Milan. Finance company.

N.V. Morgan Finance (Belgium) S.A., Brussels. Finance company.

Morgan Guaranty GmbH, Investment bank.

Morgan Guaranty Ltd with offices in Delaware and London. Underwrites and trades in Eurobonds and arranges syndicated loans and private placements.

Associated companies (% ownership in parentheses):

Banco Inter-Atlantico de Inverimento S.A., Rio de Janeiro (50%). Investment banking and through affiliated companies provides leasing and brokerage.

Saudi International Bank (Al-Bank Al-Saudi Al-Alami Ltd.), London (20%). Merchant bank.

MDM-Sociedad de Inverimentos S.A.R.L., Lisbon (33.3%). Financial services company.

AUC Holdings Limited, Melbourne (67.5%). Merchant bank.

National Discount Company Limited, Singapore (35%). Discount house investing and dealing in Singapore dollar money-market securities.

Bank of the Philippine Islands, Manila (20.4%). Commercial bank.

P.T. Merchant Investment Corporation, Jakarta (25%). Merchant bank.

ICON Limited (Merchant Bankers), Lagos (25%). Merchant bank.

Inversiones Finaiven S.A., Caracas (20%). Finance company.

Banco Morgan Finanza, Santiago (50%). Commercial bank.

Arrendadora Somez S.A., Mexico City (44%). Leasing company.

Computer Systems Leasing, Ltd., Tokyo (29%). Leasing company.

Senior Officers

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R.V. Lindsay, Pres.

Dennis Weatherstone, Chmn. of Exec. Comm.
J.P. Ruffie, Vice Chmn.

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D.E. Symecko, Senior Vice-Pres. & Comptroller

Penelope A. Flieger, Senior Vice-Pres. & Auditor

K.F. Viermetz, Treas.

Directors: See under J.P. Morgan & Co. Inc. incorporated, preceding statement.

Offices:

Banking, 23 Wall St., New York, N.Y. 10015.

Private Banking, 9 West 47th St., New York, N.Y. 10019.

Stock Transfer Dept., 30 W. Broadway, N.Y. 10015. Tel.: (212) 483-2323.

J.F. Loughran

P.H. Madden

M.J.G. Maeniant

R.M. Mastrangelo

J.A. Mayer, Jr.

W.J. McGoldrick

R.D. McKechnie

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COMPARATIVE STATEMENT OF CONDITION, AS OF DEC. 31

	1985	1984	1983	1982	1981	1980	1979
Resources							
Cash & due from banks	4,381,000	4,961,000	4,649,000	4,356,000	4,433,000	8,094,753	7,054,444
Interest-bearing deposits at banks	7,073,000	6,644,000	7,639,000	7,924,000	8,406,000	7,417,739	6,009,477
U.S. Treasury securities							
Securities of U.S. Govt. agencies	9,916,000	7,372,000	6,161,000	5,723,000	4,788,000	4,434,300	3,174,265
Securities of states and political subdivisions							
Other investment securities							
Trading account assets, net	2,870,000	1,091,000	906,000	1,060,000	645,000	382,457	481,635
Fixed fund and secur. purch. under							
Agreements to resell	2,406,000	2,019,000	754,000	627,000	938,000	432,062	192,461
Loans and lease financing	34,307,000	33,356,000	31,529,000	30,432,000	28,434,000	25,217,464	21,517,461
Fees and equipment, net	466,000	273,000	233,000	203,000	191,000	168,178	46,141
Allowance receivable, net	1,041,000	2,811,000	1,837,000	3,998,000	3,079,000	2,543,144	2,166,307
Accrued interest	994,000	1,028,000	907,000	1,085,000	2,175,000	1,271,182	1,420,811
Other assets	1,715,000	1,669,000	968,000	1,466,000			
Total	65,771,000	61,224,000	55,683,000	56,778,000	55,111,000	51,640,789	42,284,426
Liabilities							
Non-interest-bearing deposits in offices in the U.S.	7,945,000	8,209,000	7,519,000	7,162,000	6,704,000	6,066,000	9,876,477
Non-interest-bearing deposits in offices outside the U.S.	644,000	421,000	433,000	471,000			
Interest-bearing deposits in offices in the U.S.	5,397,000	5,647,000	5,473,000	8,188,000	7,344,000	6,402,467	4,776,154
Interest-bearing deposits in offices outside the U.S.	27,106,000	25,720,000	23,648,000	24,084,000	22,944,000	19,427,739	6,771,812
Total deposits	41,192,000	39,997,000	36,673,000	39,855,000	37,092,000	31,936,606	21,424,443
Fixed fund and secur. sold under							
Agreements to repurchase	9,168,000	8,903,000	5,822,000	6,270,000	7,204,000	4,852,144	3,326,646
Other liabilities for borrowed money	6,166,000	4,094,000	4,544,000	5,823,000	5,032,000	4,901,000	2,954,270
Accrued taxes and expenses	1,020,000	1,367,000	1,048,000	1,036,000	1,061,000	1,066,524	699,499
Reserve for contingencies	64,000	24,000	1,837,000	3,998,000	3,079,000	2,543,144	2,166,307
Other liabilities	74,000	66,000	90,000	45,000	15,000	15,000	35,000
Total liabilities	47,488,000	42,660,000	39,830,000	43,308,000	42,891,000	40,411,174	30,681,169
Unallocated capital	18,283,000	18,564,000	15,853,000	13,470,000	12,219,000	11,204,183	11,603,257

	1985	1984	1983	1982	1981	1980
Subord. note pay. to parent						
Constit. primary cap.	450,000	250,000	250,000	250,000	250,000	250,000
Other liabilities	1,714,000	719,000	592,000	1,039,000	506,000	742,276
Total liabilities	62,294,000	58,104,000	52,777,000	54,324,000	50,817,000	48,611,176
Stockholder's Equity:						
Preferred stock	250,000	250,000	250,000	250,000	250,000	250,000
Capital stock	250,000	250,000	250,000	250,000	250,000	250,000
Surplus	492,000	592,000	592,000	592,000	592,000	592,000
Undivided profits	2,402,000	2,053,000	1,828,000	1,622,000	1,417,000	1,249,285
Eq. adj. from ign. curr. trans.	22,000	25,000	(14,000)	(10,000)	(5,000)	(5,000)
Total stockholder's equity	3,122,000	3,120,000	2,906,000	2,454,000	2,254,000	2,017,670
Total liabilities and stockholders equity	65,416,000	61,224,000	55,683,000	56,778,000	53,111,000	50,650,780

General Notes: (a) Principles of consolidation: Financial statements include foreign subsidiaries in excess of 50% ownership. The consolidated financial statements include the accounts of the parent company and all subsidiaries; in addition, the equity method accounting is utilized in determining the carrying values of certain investments in affiliates in which the proportion of ownership is 20% or more.

Long Term Debt: 1. 8% Capital Notes, due 1982: AUTH.—\$100,000,000; outstanding, Dec. 31, 1985, \$47,000,000.

DATED—Feb. 1, 1967. DUE—Feb. 1, 1992.

INTEREST—F&A 1.

TRUSTEE—Marine Midland Bank, N.A., NYC.

DENOMINATION—Fully registered, \$1,000 and authorized multiples thereof. Notes may be transferred, combined or split up without payment of any charge other than stamp taxes or other governmental charge.

CALLABLE—As a whole or in part on or after Feb. 1, 1972 on at least 30 days' notice to each Jan. 31, incl., as follows:

1985 100.325 1986 100.350 1987 100.375

Thereafter at 100.

Also callable for sinking fund (which see) at par.

SINKING FUND—Annually, each Feb. 1, 1972-91, cash (or notes), to retire notes at par, equal to \$3,000,000 notes outstg. plus similar optional payments. Sinking fund payments calculated to retire 60% of issue prior to maturity.

SECURITY—Notes are subordinated and junior in right of payment to obligations to depositors and other creditors and certain other conditions as described in the indenture.

Indenture provides that Bank will not create or incur any funded debt except long term debt (whether secured or unsecured) ranking on a par or prior to the capital notes.

RIGHTS ON DEFAULT—Trustee, or 25% of notes outstg. may declare principal due and payable 30 days' grace for payment of interest.

INDENTURE MODIFICATION—Indenture may be modified, except as provided, with consent of 66-2/3% of notes outstg.

PURPOSE—Proceeds added to general funds of bank.

OFFERED—\$100,000,000 at 98 1/2 on Feb. 1, 1967 thru Morgan Stanley & Co., NYC, and associates.

PRICE RANGE—

	1985	1984	1983	1982	1981	1980	1979
High	74 1/2	64 1/2	78	61	68		
Low	69	64 1/2	78	60	62		

2. Other Debt: Outstanding Dec. 31, 1985, \$187,000,000 comprising:

(1) \$11,000,000 various rate mortgage payable \$1,062,500 annually thru 1995.

(2) \$31,000,000 floating rate French franc notes, due 1989.

(3) \$52,000,000 floating rate French franc notes, due 1992.

(4) \$41,000,000 Australian dollar notes issued by Morgan Guaranty Australia Ltd. due 1990. The notes may be redeemed, at the option of the issuer, as a whole at any time if certain tax events occur. Payment of principal and interest is unconditionally guaranteed by J.P. Morgan. Concurrently with the issuance of the notes, Morgan Guaranty Australia Ltd. entered into an interest rate swap which effectively converted the interest rate on a portion of the debt from a fixed to a floating rate tied to the floating ninety-day Australian bank bill rate.

(5) \$32,000,000 floating rate French franc notes issued by Morgan & Cie SA, due 1990-93. The notes will be redeemed in four equal annual installments starting on Feb. 20, 1990. However, up to notes one-twentieth of the notes may be retired each year until Feb. 19, 1989, through the repurchase of the notes at market price by Morgan & Cie S.A. Payment of principal and interest is unconditionally guaranteed by J.P. Morgan.

Subsidiary Debt: Morgan (J.P.) Overseas Capital Corp. guaranteed convertible debenture 4 1/2%, 1987:

AUTH.—\$50,000,000; outstg., Dec. 31, 1985, \$2,000,000.

DATED—June 14, 1972. DUE—June 15, 1987.

INTEREST—Annually, commencing June 15, 1973, at offices of paying agents listed below.

TRUSTEE—Manufacturers Hanover Trust Co., NYC.

PAYING AGENTS—Manufacturers Hanover Trust Co., NYC, Brussels, Frankfurt, London, Paris, Tokyo, and Zurich; Banca Morgan Vonwiller S.p.A., Milan; Bank Mees & Hope N.V., Amsterdam; Caisse d'Epargne de l'Etat, Luxembourg.

DENOMINATION—Bearer, \$1,000.

CALLABLE—As a whole or in part at any time after July 15, 1975 at 100.

Not callable, however, prior to June 15, 1977 unless market price for J.P. Morgan com. stock, into which debts are convertible, on each day on which there was such a market price within 30 days' immediately preceding the 15th day preceding the date upon which notice of redemption is first published is at least 150% of the conversion price in effect on each such day.

If, as a result in any change in tax laws of U.S. effective after June 14, 1972, Co. would be required to pay additional interest (see Taxes on Principal, Premium or Interest), debts may be redeemed only as a whole at any time on or after July 15, 1973 on at least 30 days' notice at 100.

CONVERTIBLE—Into com. stock of J.P. Morgan & Co., Inc., parent, at any time prior to maturity (if called, redemption date) at \$26.125 a sh. No adjustment for interest or divs. Cash paid in lieu of fractional shs. Conversion privilege protected against dilution.

GUARANTEED—Unconditionally, by J.P. Morgan & Co., Inc., as to payment of principal premium or interest.

TAXES ON PRINCIPAL, PREMIUM OR INTEREST—Co. will pay as additional interest such amounts as may be necessary to reimburse non-resident alien holders for any present or future U.S. withholding tax.

RIGHTS ON DEFAULT—Trustee, or 25% of debts outstg. may declare principal due and payable.

INDENTURE MODIFICATION—Indenture may be modified, except as provided, with consent of a majority of debts outstg.

PURPOSE—Proceeds for investments and loans outside the United States.

OFFERED—(\$50,000,000) at 100 (proceeds to Co., 97 1/2) on June 14, 1972 thru Morgan & Cie

International S.A. and Morgan Grenfell & Co. Ltd. and associates.

Capital Stock: 1. Series A Adjustable Rate Cumulative Preferred Stock; no par (stated value \$100):

Outstg., 2,500,000 shs.; no par.

Issued in March 1983 to J.P. Morgan & Co., Inc.

The dividend rate for the initial dividend period ended June 30, 1983, was 9 1/2% per annum. For each quarterly period thereafter the dividend rate is set at 4 1/2% less than the highest of the per annum three-month U.S. Treasury bill rate, the U.S. Treasury note ten-year constant maturity rate, or in the U.S. Treasury bond twenty-year constant maturity rate. The quarterly rate in no event will be less than 3% per annum or greater than 11 1/2% per annum. Dividends are payable quarterly. The preferred stock is generally nonvoting, has a dividend preference, and has a liquidation preference of \$100 per share plus accrued and unpaid dividends.

2. Common Stock: \$250,000,000; par \$25.

All owned by J.P. Morgan & Co., Incorporated.

Par changed from \$100 to \$20 Jan. 22, 1959 by 5-for-1 split; changed to \$25 Apr. 24, 1959 on merger of J.P. Morgan & Co., Inc. (see above).

Original capital stock was \$100,000,000; increased to \$2,000,000 in 1891, to \$5,000,000 in 1910; to \$10,000,000 in 1912; to \$20,000,000 in 1916; to \$25,000,000 in 1917; to \$100,000,000 in Mar., 1927; to \$40,000,000 in June, 1928; to \$70,000,000 in May, 1929 by merger of National Bank of Commerce; to \$90,000,000 in Feb., 1929; to \$100,000,000 in Feb., 1947; to \$120,000,000 Feb. 21, 1957 by 20% stock dividend; to \$188,500,000 Apr. 24, 1959 on merger of J.P. Morgan & Co., Inc. to \$207,350,000 Feb. 21, 1963 by 10% stock dividend; to \$228,085,000 Apr. 15, 1965 by 10% stock dividend; to \$237,500,000 Nov. 8, 1967 by sale of stock to parent.

Dividends: (Morgan Guaranty Trust Co. On \$25 par shares:

1959 \$1.60 1960 \$4.40 1961-67 \$4.40 1968 4.40 1969 2.30

Also stock dividends: Feb. 21, 1963 and Apr. 15, 1965, 10%.

To Apr. 16, last publicly paid dividend: Dividends (Guaranty Trust Co. of N.Y.—payments from 1891 to Apr. 24, 1959):

On \$100 par shares:

1892 \$6.00 1893 \$7.00 1894 \$6.00 1895 9.00 1896 10.00 1897 7.00 1898 12.00 1899 12.00 1900-01 7.00 1902 17.00 1903-09 20.00 1910 32.00 1911 40.00 1912 38.00 1913 32.00 1914-15 28.00 1916 32.50 1917 22.00 1918-20 20.00 1921 16.00 1922-26 12.00 1927-28 16.00 1929 19.00 1930-33 20.00 1934 15.00 1935 14.00 1936-49 12.00 1950-51 14.00 1952 15.00 1953 6.00

On \$20 par shares:

1953 2.25 1954 3.55 1955 2.40 1956-58 4.00 1959 2.40

Also stock dividends: Feb. 1947 11 1/2%; Feb. 1957, 20%.

STATEMENT OF DESIGNATION OF COUNSEL

NR 2248

NAME OF COUNSEL: Davis Polk & Wardwell

ADDRESS: 1575 I Street, N.W. /Suite 400


Washington, D.C. 20005

Attention: Richard Moe, Esq.

TELEPHONE: 202-789-7190

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.

10/2/86
Date


Signature Edmund P. Rogers III
Senior Vice President and
Resident Counsel

RESPONDENT'S NAME: Morgan Guaranty Trust Company of New York

ADDRESS: 23 Wall Street

New York, NY 10015

Attention: Edmund P. Rogers III, Senior Vice President and
Resident Counsel

HOME PHONE: _____

BUSINESS PHONE: 212-483-3166

86040522316

attachment 3

EDWARD C. COSGROVE

ATTORNEY AT LAW

SUITE 1000 MAIN-SENECA BUILDING

237 MAIN STREET

BUFFALO, NEW YORK 14203

716-854-2211

HAND DELIVERED
OCT 17 1986

EDWARD C. COSGROVE

JOHN P. FREEDENBERG

OF COUNSEL

JUDITH BLAKE MANZELLA

EUGENE P. O'CONNOR

October 16, 1986

Charles N. Steele, Esq.
Lawrence M. Noble, Esq.
Federal Election Commission
Washington, D.C. 20463

Re: MUR 2248

Gentlemen:

I have been retained by Robert E. Whelan, Comptroller of the City of Buffalo and a Respondent in the above-referenced Matter Under Review, to prepare a response on his behalf to the petitioner's complaint herein. The Statement of Designation of Counsel is enclosed herewith.

As set forth in the response of Davis, Polk & Wardwell, attorneys for respondent Morgan Guaranty Trust Company of New York, dated October 14, 1986, petitioner's complaint is jurisdictionally deficient.

Petitioner alleges an "apparent violation" of 2 U.S.C. §441 (b) and other applicable provisions. An examination of this statute reveals that its applicability is limited to, and thus this Commission's jurisdiction is presumably limited to, contributions made by any national bank, and contributions made by any corporation in connection with presidential or congressional elections.

As the aforementioned response of Davis, Polk & Wardwell clearly demonstrates, Morgan Guaranty Trust Company of New York is not a national bank, and thus it is not strictly forbidden from making political contributions.

Furthermore, respondent Robert E. Whelan is not a candidate for any of the federal offices set forth in the applicable statute.

Even if the complaint herein were not jurisdictionally deficient, its underlying "facts" give rise to no cause for controversy.

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20010104122

Charles N. Steele, Esq.
Lawrence M. Noble, Esq.
Page 2
October 16, 1986

Morgan Guaranty was incorrectly designated as a contributor of services on the Financial Disclosure Statement of "Friends of Bob Whelan." In actuality, one or two individuals employed by Morgan Guaranty contributed their personal secretarial and clerical services valued at \$150.00.

For all of the above reasons, no action by the Commission is warranted with respect to the subject complaint. Thank you for your attention to this matter.

Yours truly,


EDWARD C. COSGROVE

ECC/jmp
Enclosure

85340622318

STATEMENT OF DESIGNATION OF COUNSEL

NR 2248

NAME OF COUNSEL: EDWARD C. COSGROVE, ESQ.


ADDRESS: Suite 1000, Main-Seneca Building
237 Main St., Buffalo, NY 14203

TELEPHONE: (716) 854-2211

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.

October 16, 1986

Date


Signature

RESPONDENT'S NAME: ROBERT E. WHELAN

ADDRESS: 1200 City Hall
Buffalo, NY 14202

HOME PHONE: 876-8952

BUSINESS PHONE: 855-5255

85040522319

attachment 4
(part 1)



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Richard Moe, Esquire
Davis Polk & Wardwell
1575 I Street, N.W.
Washington, D.C. 20005

RE: MUR 2248
Morgan Guaranty Trust Co.

Dear Mr. Moe:

On September 29, 1986, the Commission notified your client of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on , 1986, determined that on the basis of the information in the complaint, and information provided by you, there is no reason to believe that a violation of any statute within its jurisdiction has been committed. Accordingly, the Commission closed its file in this matter. This matter will become a part of the public record within 30 days.

Sincerely,

Charles N. Steele
General Counsel

By Lawrence M. Noble
Deputy General Counsel

Enclosure
General Counsel's Report

85040522320



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Edward C. Cosgrove, Esquire
Suite 1000 Main-Seneca Building
237 Main Street
Buffalo, New York 14203

RE: MUR 2248
Robert E. Whelan

Dear Mr. Cosgrove:

On September 29, 1986, the Commission notified your client of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

The Commission, on , 1986, determined that on the basis of the information in the complaint, and information provided by you, there is no reason to believe that a violation of any statute within its jurisdiction has been committed. Accordingly, the Commission closed its file in this matter. This matter will become a part of the public record within 30 days.

Sincerely,

Charles N. Steele
General Counsel

By Lawrence M. Noble
Deputy General Counsel

Enclosure
General Counsel's Report

85040522321

Attachment 5



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Richard Planavsky
City Hall Room 203
Buffalo, New York 14202

Re: MUR 2248

Dear Mr. Planavsky:

The Federal Election Commission has reviewed the allegations of your complaint dated September 19, 1986, and determined on , 1986, that on the basis of the information provided in your complaint (and information provided by the Respondent) there is no reason to believe that a violation of the Federal Election Campaign Act of 1971, as amended ("the Act") has been committed. Accordingly, the Commission has decided to close the file in this matter. The Federal Election Campaign Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

Should additional information come to your attention which you believe establishes a violation of the Act, you may file a complaint pursuant to the requirements set forth in 2 U.S.C. § 437g(a)(1) and 11 C.F.R. § 111.4.

Sincerely,

Charles N. Steele
General Counsel

By Lawrence M. Noble
Deputy General Counsel

Enclosure
General Counsel's Report

85040522322



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *ped*
DATE: November 4, 1986
SUBJECT: MUR 2248 - First General Counsel's Rpt.

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

CIRCULATIONS

48 Hour Tally Vote	<input checked="" type="checkbox"/>
Sensitive	<input checked="" type="checkbox"/>
Non-Sensitive	<input type="checkbox"/>
24 Hour No Objection	<input type="checkbox"/>
Sensitive	<input type="checkbox"/>
Non-Sensitive	<input type="checkbox"/>
Information	<input type="checkbox"/>
Sensitive	<input type="checkbox"/>
Non-Sensitive	<input type="checkbox"/>
Other	<input type="checkbox"/>

DISTRIBUTION

Compliance	<input checked="" type="checkbox"/>
Audit Matters	<input type="checkbox"/>
Litigation	<input type="checkbox"/>
Closed MUR Letters	<input type="checkbox"/>
Status Sheets	<input type="checkbox"/>
Advisory Opinions	<input type="checkbox"/>
Other (see distribution below)	<input type="checkbox"/>

86040522323

GCC 1755

DAVIS POLK & WARDWELL

1575 I STREET, N. W.

WASHINGTON, D. C. 20005

202-789-7100

1 CHASE MANHATTAN PLAZA, NEW YORK, N. Y. 10008
TELEPHONE: 212-530-4000

TELEX: ITT-440888

TELECOPIER: 202-789-7120

WRITER'S DIRECT NUMBER:

4, PLACE DE LA CONCORDE, 75008 PARIS
TELEPHONE: (1) 48. 00. 14. 01

400 PARK AVENUE, NEW YORK, N. Y. 10022
TELEPHONE: 212-530-4000

1 FREDERICK'S PLACE, LONDON EC2R 8AS
TELEPHONE: 01-726 6860

October 14, 1986

Re: MUR 2248

Charles N. Steele, Esq.
Lawrence M. Noble, Esq.
Federal Election Commission
Washington, D.C. 20463

Dear Sirs:

As indicated by the enclosed Statement of Designation of Counsel, we are acting as counsel to Morgan Guaranty Trust Company of New York ("MGT") in connection with the above referenced matter and, in that capacity, write this letter in response to the complaint filed by Richard Planavsky against MGT. The complaint is plainly deficient because MGT is not a national bank and the complaint and its attachments indicate that the alleged contributions relate to either local or county elections, not federal elections. MGT is simply not in violation of the provision cited by Mr. Planavsky or any other provision of the federal election campaign laws.

Mr. Planavsky states as follows in his affidavit: "Upon information and belief . . . Morgan Guaranty Trust Company, is a bank or corporation subject to the provisions of Chapter 14 of Title 2 of the United States Code." He further states that MGT acted as financial advisor to the City of Buffalo in matters relating to the sale of bonds and notes and also contributed things of value to a political committee organized to support Mr. Robert Whelan, the Comptroller of the City of Buffalo. Mr. Planavsky states that such contribution to the Whelan political committee by MGT constituted a violation of Section 316 of the Federal Election Campaign Act of 1971, as amended (the "FECA"), 2 U.S.C.A. § 441b (1985), "and of other applicable provisions."

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RECEIVED
GENERAL COUNSEL
OCT 17 1986

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There is only one provision of the FECA that could apply to the alleged contribution at issue in Mr. Planavsky's complaint, Section 316(a), 2 U.S.C.A. § 441b(a) (1985), which reads:

(a) It is unlawful for any national bank, or any corporation organized by authority of any law of Congress, to make a contribution or expenditure in connection with any election to any political office, or in connection with any primary election or political convention or caucus held to select candidates for any political office, or for any corporation whatever, or any labor organization, to make a contribution or expenditure in connection with any election at which presidential and vice presidential electors or a Senator or Representative in, or a Delegate or Resident Commissioner to, Congress are to be voted for, or in connection with any primary election or political convention or caucus held to select candidates for any of the foregoing offices "

The section creates a dual prohibition. First, national banks and other corporations organized under federal law are prohibited from making contributions or expenditures in connection with any election whatsoever. Second, all corporations are prohibited from making contributions or expenditures in connection with elections to federal office. This interpretation of the section is confirmed by the regulations issued by the Federal Election Commission which clearly distinguish between the prohibition imposed on national banks and federally chartered corporations and the narrower prohibition imposed on other corporations. Compare 11 C.F.R. § 114.2(a) (1986) with 11 C.F.R. § 114.2(b) (1986).

Even assuming that MGT made a payment constituting a "contribution" or an "expenditure" (an issue which MGT does not concede), it is not possible for MGT to be in violation of the first branch of Section 316(a) because MGT is neither a "national bank nor a corporation organized by authority of any law of Congress." MGT is a state-chartered trust company and has been ever since its predecessor was organized in 1864 as "New York Guaranty & Indemnity Co." Indeed, its name alone, "Morgan Guaranty Trust Company of New York," is proof that it is not a national bank, because a national bank must

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Charles N. Steele, Esq.
Lawrence M. Noble, Esq.

-3-

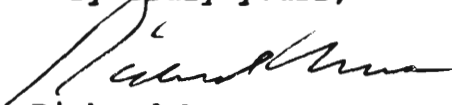
October 14, 1986

have the word "national" as part of its official name. 12 U.S.C.A. § 22 (Supp. 1986). As evidence of MGT's official name and status as a state-chartered trust company, an excerpt from Moody's Bank & Finance Manual is attached hereto.

Neither can the acts allegedly committed by MGT constitute a violation of the second branch of Section 316(a). Even if the allegations of Mr. Planavsky's complaint were accepted as true, those allegations pertain only to the solicitation of funds for a political committee called Friends of Bob Whelan. Mr. Whelan is the present Comptroller of the City of Buffalo and there is no indication anywhere in Mr. Planavsky's complaint that Friends of Bob Whelan has or intends to have any connection with any federal election whatsoever. In fact, the newspaper article attached by Mr. Planavsky to his complaint states that Mr. Whelan's "political options for 1987 include running for re-election or for Erie County executive." As the above discussion makes clear, the prohibition imposed by Section 316(a) of the FECA on corporations other than national banks and federally chartered corporations applies only to elections to federal office and not to state or local elections.

No action by the Commission is warranted because there has been no violation of the federal election campaign laws.

Very truly yours,



Richard Moe

Attachment

cc: Richard Planavsky
Commissioner of Administration
and Finance of the City of Buffalo
Room 203
City Hall
Buffalo, New York 14202

86040522326

1986
VOL. 1

BANKS • TRUST COMPANIES
SAVINGS & LOAN ASSOCIATIONS
FEDERAL CREDIT AGENCIES

MOODY'S®

BANK & FINANCE MANUAL

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MORGAN GUARANTY TRUST CO. OF NEW YORK

(Controlled by J.P. Morgan & Co. Incorporated)
Incorporated in New York April 13, 1864 as New York Guaranty & Indemnity Co., name changed to Guaranty Trust Co. of New York Jan. 1, 1896; present name adopted Apr. 24, 1910 on merger with J.P. Morgan & Co., Inc. see below.

On Jan. 27, 1910, the Morton Trust Co. which in 1900 absorbed the State Trust Co. on a share for share basis, and the Fifth Avenue Trust Co. were merged with the Guaranty Trust Co. On Oct. 16, 1912, Standard Trust Co. of New York was merged. On May 6, 1919, merged Bank of Commerce in New York, formerly National Bank of Commerce in New York (chartered in 1865 originally incorporated in 1819).

On Apr. 24, 1939 merged with J.P. Morgan & Co., Inc., incorporated Mar. 21, 1940 under New York State banking law as successor to partnership of J.P. Morgan & Co. (originally established in 1861). Commenced business under new designation on Apr. 1, 1940. Under merger plan Morgan stockholders received 4 1/2 shares for each share held Guaranty Trust stock was exchanged share for share.

In Nov. 1979, Morgan Guaranty International Finance Corp., a subsidiary of The Morgan Bank acquired 20% interest in Inversiones Finaiven S.A. of Venezuela for an undisclosed amount. Morgan announced it also plans to sell its 20% interest in Sociedad Financiera Valinvenca, a Venezuelan investment bank to Inversiones.

In May 1981, sold 29.32% interest in Morgan Grenfell Holdings Ltd.
Divisions: Banking, Financial and Information Systems Operations, Treasurer's Private Banking, and Administration.

Member of Federal Reserve System and Federal Deposit Insurance Corp.

Operates four banking offices in New York, and one each in Antwerp, Brussels, Buenos Aires, Frankfurt, Hong Kong, London, Madrid, Milan, Nassau, Paris, Rome, St. Helier, Seoul, Singapore, Taipei, Tokyo and Zurich.

Also has representative offices in Beirut, Caracas, Jakarta, Kuala Lumpur, Los Angeles, Manila, Melbourne, Mexico City, San Francisco, Sao Paulo and Sydney.

Also has a regional office in Tokyo.

Subsidiaries:

Wholly owned

J.P. Morgan Interfunding Corp. Manages a portfolio of capital equipment leases and intermediate-term loans.

Morprop Incorporated. Holds real estate acquired in connection with loans.

Morgan Guaranty International Bank with offices in Miami, Houston, San Francisco, Los Angeles and Nassau. "Edge Act" bank, headquartered in Miami, performing international banking services for clients in the United States and abroad.

Morgan Trust Company of the Cayman Islands, Cayman, Ltd., subsidiary of Morgan Guaranty International Bank, providing international services for clients.

Morgan Trust Company of The Bahamas Limited. Provides international banking and trust services for clients.

Morgan Guaranty International Finance Corp. "Edge Act" company holding interests in overseas banks, investment firms, and other businesses.

J.P. Morgan Overseas Capital Corp. Incorporated in Delaware to finance overseas activities with funds raised in international capital markets.

Morgan Bank of Canada, Toronto. Chartered bank—accepts deposits and makes loans in local and foreign currencies.

J.P. Morgan (Swiss) S.A., Geneva, provides banking services, including investment management for individuals.

J.P. Morgan Investment Management Pacific Limited. Markets international investment services, manages portfolios, and conducts regional investment research.

Morgan Bank Nederland N.V., Amsterdam. Merchant bank.

Morgan & Cie S.A., Paris. Merchant bank.

Morgan Guaranty Finance Ltd., Hamilton, Bermuda. Euro-dollar investment facility.

Morgan Guaranty Pacific Limited. Merchant bank.

Morgan Guaranty S.A.E., Madrid. Merchant bank.

Morgan Guaranty (Switzerland) Ltd. Zurich. Finance company; also engages in underwriting.

Morgan International Finance (Italy) S.p.A., Milan. Finance company.

N.V. Morgan Finance (Belgium) S.A., Brussels. Finance company.

Morgan Guaranty GmbH, Investment bank.

Morgan Guaranty Ltd. with offices in Delaware and London. Underwrites and trades in Eurobonds and arranges syndicated loans and private placements.

Associated companies (% ownership in parentheses):

Banco Inter-Atlantico de Investimento S.A., Rio de Janeiro (50%). Investment banking and through affiliated companies provides leasing and brokerage.

Saudi International Bank (Al-Bank Al-Saudi Al-Alami Ltd.), London (20%). Merchant bank.

MDM-Sociedad de Inversiones S.A.R.L., Lisbon (33.3%). Financial services company.

AUC Holdings Limited, Melbourne (67.3%). Merchant bank.

National Discount Company Limited, Singapore (35%). Discount house investing and dealing in Singapore dollar money-market securities.

Bank of the Philippine Islands, Manila (20.4%). Commercial bank.

P.T. Merchant Investment Corporation, Jakarta (25%). Merchant bank.

ICON Limited (Merchant Bankers), Lagos (25%). Merchant bank.

Inversiones Finaiven S.A., Caracas (20%). Finance company.

Banco Morgan Finansa, Santiago (50%). Commercial bank.

Arrendadora Somex S.A., Mexico City (44%). Leasing company.

Computer Systems Leasing, Ltd., Tokyo (20%). Leasing company.

Senior Officers

L.T. Preston, Chmn.

R.V. Lindsay, Pres.

Dennis Weatherstone, Chmn. of Exec. Comm.
J.F. Ruffie, Vice Chmn.

Executive Vice Presidents

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J.T. Flynn

D.L. Hopkins, Jr.

R.G. Mendosa, Jr.

R.G. Engel, Group Exec. Corp. Fin.

W.E. Pike, Chmn., Credit Policy Comm.

D.B. Riefler, Chmn., Sources & Uses of Funds Comm.

A.B. Brackenridge, Chmn., Admin. Policy Comm.

P.B. Smith, Chmn., Credit Policy Comm.

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Eric Bourdais de

Charbonniere

D.L. Brigham

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G.D.E. Chaloner

N.D. Chrisman

S.C. Chugh

P.P. Conlin

M.R. Corey

D.M. Cromwell

P.H.R. Daviron

R.J. de la

Gueronniere

Conrado de las Heras

Richard Delbridge

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Rimmer de Vries

Bruno Eberli

W.C. Eisenman

A.C. Eschenlauer

Guy Field

J.W. Field, Jr.

D.W. Fisher

Fock Siew-Wah

T.H. Fox

A.E. Fusina

J.F. Garry

Antonio Gebauer

W.A. Gubert

Paul De F. Hicks, Jr.

M.W. Hudson

Ettore Landi

J.W. Lapsley

G.B. Levey

J.J. Lewis

R.F. Longley

E.P. Rogers III, Senior Vice-Pres. Sec. & Res. ident Counsel

D.E. Symecko, Senior Vice-Pres. & Comptroller

Penelope A. Flieger, Senior Vice-Pres. & Auditor

K.F. Viernmetz, Treas.

Directors: See under J.P. Morgan & Co. Inc. incorporated, preceding statement.

Offices:

Banking, 23 Wall St., New York, N.Y. 10015.

Private Banking, 9 West 57th St., New York, N.Y. 10019.

Stock Transfer Dept., 30 W. Broadway, N.Y. 10015. Tel: (212) 483-2323.

A.M. Rogers, Jr.

D.L. Roscoe III

H.J. Roundell

G.W. Rowe

J.A. Scully

R.G. Selig

R.L. Siebe

J.A. Snyder

Richard Speciale

W.A. Stange

T.W. Stanley

T.J. Sweeney

F.E. Teitzel

Osamu Toba

K.F. Viernmetz

A.M. Vinton, Jr.

F.K. vom Hote

Jorgen Wagner

Knudsen

D.D. Wakefield

D.A. Warner III

M.J. Webb

F.C. Wittell, Jr.

R.J. Wynn

COMPARATIVE STATEMENT OF CONDITION, AS OF DEC. 31

	1985	1984	1983	1982	1981	1980	1979
Resources							
Assets & due from banks	4,381,000	4,961,000	4,649,000	4,356,000	4,433,000	8,095,753	7,954,914
Interest-bearing deposits at banks	7,073,000	6,644,000	7,659,000	7,924,000	8,408,000	7,411,739	6,009,917
U.S. Treasury securities							
Securities of U.S. Govt. agencies	9,918,000	7,372,000	6,161,000	5,725,000	4,788,000	4,434,300	3,174,265
Securities states and political subdivisions							
Other investment securities							
Trading account assets, net	2,870,000	1,091,000	906,000	1,060,000	645,000	382,557	481,635
Loans sold and secur. purch. under agreements to resell	2,406,000	2,019,000	754,000	627,000	958,000	432,062	492,968
Net loans and lease financing	34,307,000	33,356,000	31,529,000	30,432,000	28,434,000	25,211,484	21,957,662
Fees and equipment, net	466,000	273,000	233,000	203,000	191,000	168,318	146,191
Customers' acceptance liability	1,641,000	2,811,000	1,837,000	3,898,000	3,079,000	2,443,194	2,066,007
Accrued interest	994,000	1,028,000	967,000	1,085,000	2,175,000	1,971,182	1,429,814
Other assets	1,715,000	1,669,000	988,000	1,468,000			
Total	65,771,000	61,224,000	55,683,000	56,778,000	59,111,000	50,650,789	42,284,526
Liabilities							
Non-interest-bearing deposits in offices in the U.S.	7,985,000	8,209,000	7,519,000	7,162,000	6,796,000	10,666,914	9,876,976
Non-interest-bearing deposits in offices outside the U.S.	644,000	421,000	433,000	173,000			
Interest-bearing deposits in offices in the U.S.	5,397,000	5,647,000	5,873,000	8,188,000	7,115,000	7,402,480	5,796,758
Interest-bearing deposits in offices outside the U.S.	27,106,000	25,720,000	25,648,000	24,085,000	21,941,000	14,527,743	6,711,812
Total deposits	41,132,000	39,997,000	39,473,000	39,503,000	35,852,000	32,597,137	32,385,546
Fees due to banks and secur. sold under agreements to resell	9,168,000	8,903,000	5,822,000	6,270,000	5,216,000	4,852,000	3,326,696
Other liabilities for borrowed money	6,141,000	4,094,000	1,544,000	1,823,000	1,032,000	1,360,000	2,954,270
Accrued taxes and expenses	1,029,000	1,087,000	1,048,000	1,030,000	1,061,000	968,525	699,499
Other liabilities, net	1,641,000	2,413,000	1,837,000	3,902,000	1,619,000	2,544,072	2,067,335
Total liabilities	61,111,000	56,706,000	51,683,000	52,338,000	46,770,000	42,342,634	38,824,746
Reserves	4,660,000	4,518,000	4,000,000	4,440,000	12,341,000	8,308,155	3,459,780
Total	65,771,000	61,224,000	55,683,000	56,778,000	59,111,000	50,650,789	42,284,526

	1985	1984	1983	1982	1981	1980
Subord. note pay. to parent						
Const. primary cap.	450,000	250,000	250,000	250,000		
Other liabilities	1,714,000	719,000	592,000	1,039,000	506,000	742,276
Total liabilities	62,299,000	58,104,000	52,777,000	54,324,000	50,857,000	48,633,119
Stockholder's Equity:						
Preferred stock	250,000	250,000	250,000	250,000	250,000	250,000
Capital stock	250,000	250,000	250,000	250,000	250,000	250,000
Surplus	592,000	592,000	592,000	592,000	592,000	518,184
Undivided profits	2,402,000	2,053,000	1,828,000	1,022,000	1,417,000	1,249,285
Eq. adj. from fn. curr. transl.	(22,000)	(25,000)	(14,000)	(10,000)	(5,000)	(1,056,300)
Total stockholder's equity	5,172,000	5,120,000	2,906,000	2,454,000	2,254,000	2,017,670
Total liabilities and stockholders equity	65,771,000	61,224,000	55,683,000	56,778,000	53,111,000	50,650,789

General Notes: (a) Principles of consolidation: Financial statements include foreign subsidiaries in excess of 50% ownership. The consolidated financial statements include the accounts of the parent company and all subsidiaries. In addition, the equity method accounting is utilized in determining the carrying values of certain investments in affiliates in which the proportion of ownership is 20% or more.

Long Term Debt: 1. 6% Capital Notes, due 1992:
AUTH.—\$100,000,000; outstanding, Dec. 31, 1985, \$47,000,000.

DATED—Feb. 1, 1967. DUE—Feb. 1, 1992.

INTEREST—F&A 1

TRUSTEE—Marine Midland Bank, N.A., NYC.

DENOMINATION—Fully registered, \$1,000 and authorized multiples thereof. Notes may be transferred, combined or split up without payment of any charge other than stamp taxes or other governmental charge.

CALLABLE—As a whole or in part on or after Feb. 1, 1972 on at least 30 days' notice to each Jan. 31, incl., as follows:

1985 100,525 1986 100,350 1987 100,175

Thereafter at 100.

Also callable for sinking fund (which see) at par.

SINKING FUND—Annually, each Feb. 1, 1972-91, cash (or notes), to retire notes at par, equal to \$3,000,000 notes outstg. plus similar optional payments. Sinking fund payments calculated to retire 60% of issue prior to maturity.

SECURITY—Notes are subordinated and junior in right of payment to obligations to depositors and other creditors and certain other conditions as described in the indenture.

Indenture provides that Bank will not create or incur any funded debt except long term debt (whether secured or unsecured) ranking on a par or prior to the capital notes.

RIGHTS ON DEFAULT—Trustee, or 25% of notes outstg., may declare principal due and payable (30 days' grace for payment of interest).

INDENTURE MODIFICATION—Indenture may be modified, except as provided, with consent of 66 2/3% of notes outstg.

PURPOSE—Proceeds added to general funds of bank.

OFFERED—(\$100,000,000) at 98 1/2 on Feb. 1, 1967 thru Morgan Stanley & Co., NYC, and associates.

PRICE RANGE—

	1985	1984-83	1982-81	1980	1979
High	74 1/2	64 1/2	78	61	68
Low	69 1/2	64 1/2	78	60	62

2. Other Debt: Outstanding Dec. 31, 1985, \$187,000,000 comprising:

(1) \$11,000,000 variable rate mortgage payable \$1,062,500 annually thru 1995.

(2) \$41,000,000 floating rate French franc notes, due 1989.

(3) \$52,000,000 floating rate French franc notes, due 1992.

(4) \$41,000,000 Australian dollar notes issued by Morgan Guaranty Australia Ltd. due 1990. The notes may be redeemed, at the option of the issuer, as a whole at any time if certain tax events occur. Payment of principal and interest is unconditionally guaranteed by J.P. Morgan. Concurrently with the issuance of the notes, Morgan Guaranty Australia Ltd. entered into an interest rate swap which effectively converted the interest rate on a portion of the debt from a fixed to a floating rate tied to the floating ninety-day Australian bank bill rate.

(5) \$52,000,000 floating rate French franc notes issued by Morgan & Cie SA, due 1990-93. The notes will be redeemed in four equal annual installments starting on Feb. 20, 1990. However, up to notes one-twentieth of the notes may be retired each year until Feb. 19, 1989, through the repurchase of the notes at market price by Morgan & Cie S.A. Payment of principal and interest is unconditionally guaranteed by J.P. Morgan.

Subsidiary Debt: Morgan (J.P.) Overseas Capital Corp. guaranteed convertible debenture 4 1/2%, 1987:

AUTH.—\$50,000,000; outstg., Dec. 31, 1985, \$2,000,000.

DATED—June 14, 1972. DUE—June 15, 1987.

INTEREST—Annually, commencing June 15, 1973, at offices of paying agents listed below.

TRUSTEE—Manufacturers Hanover Trust Co., NYC.

PAYING AGENTS—Manufacturers Hanover Trust Co., NYC, Brussels, Frankfurt, London, Paris, Tokyo, and Zurich; Banca Morgan Vonwiller S.p.A., Milan; Bank Mees & Hope NV, Amsterdam; Caisse d'Epargne de l'Etat, Luxembourg.

DENOMINATION—Bearer, \$1,000

CALLABLE—As a whole or in part at any time after July 15, 1975 at 100.

Not callable, however, prior to June 15, 1977 unless market price for J.P. Morgan common stock, into which debts are convertible, on each day on which there was such a market price within 30 days' immediately preceding the 15th day preceding the date upon which notice of redemption is first published is at least 150% of the conversion price in effect on each such day.

If, as a result in any change in tax laws of U.S. effective after June 14, 1972, Co. would be required to pay additional interest (see Taxes on Principal, Premium or Interest), debts may be redeemed only as a whole at any time on or after July 15, 1973 on at least 30 days' notice at 100.

CONVERTIBLE—Into com. stock of J.P. Morgan & Co., Inc. parent, at any time prior to maturity (if called, redemption date) at \$26.125 a sh. No adjustment for interest or divs. Cash paid in lieu of fractional shs. Conversion privilege protected against dilution.

GUARANTEED—Unconditionally, by J.P. Morgan & Co., Inc., as to payment of principal premium or interest.

TAXES ON PRINCIPAL, PREMIUM OR INTEREST—Co. will pay as additional interest such amounts as may be necessary to reimburse non-resident alien holders for any present or future U.S. withholding tax.

RIGHTS ON DEFAULT—Trustee, or 25% of debts, outstg., may declare principal due and payable.

INDENTURE MODIFICATION—Indenture may be modified, except as provided, with consent of a majority of debts, outstg.

PURPOSE—Proceeds for investments and loans outside the United States.

OFFERED—(\$50,000,000) at 100 (proceeds to Co., 97 1/2) on June 14, 1972 thru Morgan & Cie

International S.A. and Morgan Grenfell & Co. Ltd. and associates.

Capital Stock: 1. Series A Adjustable Rate Cumulative Preferred Stock; no par (stated value \$100):

Outstg., 2,500,000 shs.; no par.

Issued in March 1983 to J.P. Morgan & Co., Inc.

The dividend rate for the initial dividend period ended June 30, 1983, was 9 1/2% per annum. For each quarterly period thereafter, the dividend rate is set at 4 1/2% less than the highest of the per annum three-month U.S. Treasury bill rate, the U.S. Treasury note ten-year constant maturity rate, or in the U.S. Treasury bond twenty-year constant maturity rate. The quarterly rate in no event will be less than 5% per annum or greater than 11 1/2% per annum. Dividends are payable quarterly. The preferred stock is generally nonvoting, has a dividend preference, and has a liquidation preference of \$100 per share, plus accrued and unpaid dividends.

2. Common Stock: \$250,000,000; par \$25.

All owned by J.P. Morgan & Co., Incorporated.

Par changed from \$100 to \$20 Jan. 22, 1929 by 5-for-1 split; changed to \$25 Apr. 24, 1929 on merger of J.P. Morgan & Co., Inc. (see above).

Original capital stock was \$100,000,000, increased to \$2,000,000 in 1891; to \$5,000,000 in 1910; to \$10,000,000 in 1912; to \$20,000,000 in 1916; to \$25,000,000 in 1917; to \$30,000,000 in Mar., 1927; to \$40,000,000 in June, 1929; to \$70,000,000 in May, 1929 by merger of National Bank of Commerce; to \$90,000,000 in Jan., 1929; to \$100,000,000 in Feb., 1947; to \$120,000,000 Feb. 21, 1957 by 20% stock dividend; to \$188,500,000 Apr. 24, 1959 on merger of J.P. Morgan & Co., Inc. to \$207,350,000 Feb. 21, 1963 by 10% stock dividend; to \$228,085,000 Apr. 15, 1965 by 10% stock dividend; to \$237,500,000 Nov. 8, 1967 by sale of stock to parent.

Dividends: (Morgan Guaranty Trust Co.)

On \$25 par shares:

1959	\$1.60 1960	\$4.40	1961-67	\$4.00
1968	4.40	1969	2.30	

Also stock dividends: Feb. 21, 1963 and Apr. 15, 1965, 10%.

To Apr. 16, last publicly paid dividend.

Dividends: (Guaranty Trust Co. of N.Y. — payments from 1891 to Apr. 24, 1959):

On \$100 par shares:

1892	\$6.00 1894	\$7.00 1894	\$8.00
1895	9.00 1896	10.00 1897	11.00
1898	12.00 1899	12.00 1900-01	16.00
1902	17.00 1903-09	20.00 1910	32.00
1911	40.00 1912	38.00 1913	32.00
1914-15	28.00 1916	32.50 1917	27.00
1918-20	20.00 1921	16.00 1922-26	12.00
1927-28	16.00 1929	19.00 1930-33	20.00
1934	15.00 1935	14.00	1936-49
1950-51	14.00 1952	15.00 1953	6.00

On \$20 par shares:

1953	2.25 1954	3.55 1955	3.70
1956-58	4.00 1959	2.40	

Also stock dividends: Feb. 1947, 11 1/2%; Feb. 21, 1957, 20%.

STATEMENT OF DESIGNATION OF COUNSEL

NO. 2248

NAME OF COUNSEL: Davis Polk & Wardwell

ADDRESS: 1575 I Street, N.W. /Suite 400

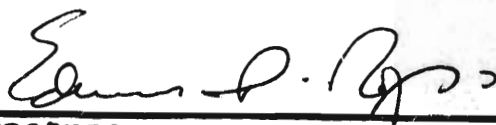
Washington, D.C. 20005

Attention: Richard Moe, Esq.

TELEPHONE: 202-789-7190

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.

10/2/86
Date


Signature Edmund P. Rogers III
Senior Vice President and
Resident Counsel

RESPONDENT'S NAME: Morgan Guaranty Trust Company of New York

ADDRESS: 23 Wall Street

New York, NY 10015

Attention: Edmund P. Rogers III, Senior Vice President and
Resident Counsel

HOME PHONE: _____

BUSINESS PHONE: 212-483-3166

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 29, 1986

Mr. Richard Planavsky
City Hall Room 203
Buffalo, NY 14202

Dear Mr. Planavsky:

This letter will acknowledge receipt of a complaint filed by you which we received on September 22, 1986, alleging possible violations of the Federal Election Campaign Act of 1971, as amended (the "Act"), by the Morgan Guaranty Trust Company and Mr. Robert E. Whelan. The respondents will be notified of this complaint within five days.

You will be notified as soon as the Commission takes final action on your complaint. Should you receive any additional information in this matter, please forward it to this office. We suggest that this information be sworn to in the same manner as the original complaint. For your information, we have attached a brief description of the Commission's procedures for handling complaints. We have numbered this matter under review MUR 2248. Please refer to this number in all future correspondence. If you have any questions, please contact Retha Dixon at (202) 376-3110.

Sincerely,

Charles N. Steele
General Counsel

Lawrence M. Noble (LH)
By: Lawrence M. Noble
Deputy General Counsel

Enclosure

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 29, 1986

Mr. Robert E. Whelan
City Hall Room 1225
Buffalo, NY 14202

Re: MUR 2248

Dear Mr. Whelan:

The Federal Election Commission received a complaint which alleges that you may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2248. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

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.

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 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 a statement authorizing such counsel to receive any notifications and other communications from the Commission.

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If you have any questions, please contact Charles Snyder, the attorney assigned to this matter, at (202) 376-8200. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

Lawrence M Noble (JH)
By: Lawrence M. Noble
Deputy General Counsel

Enclosures
Complaint
Procedures
Designation of Counsel Statement

86040522333



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 29, 1986

Morgan Guaranty Trust Company
15 Broad Street
New York, NY 10015

Re: MUR 2248

Gentlemen:

The Federal Election Commission received a complaint which alleges that you may have violated the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2248. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

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.

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 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 a statement authorizing such counsel to receive any notifications and other communications from the Commission.

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O.G.C. [unclear]
SENSITIVE



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: THE COMMISSION
FROM: MARJORIE W. EMMONS/ Darlene Small *[Signature]*
DATE: September 24, 1986
SUBJECT: MUR 2248 - COMPLAINT

The attached has been circulated for your information.

Attachment

86040622335



CITY OF BUFFALO

DEPARTMENT OF ADMINISTRATION AND FINANCE

203 CITY HALL

BUFFALO, NEW YORK

RICHARD PLANAVSKY
COMMISSIONER

September 19, 1986

Joan D. Aikens
Chairman
Federal Election Commission
Washington, D.C. 20463

Dear Ms. Aikens:

On July 18, 1986 you received my letter requesting a Federal Election Commission investigation of a possible violation of the Federal Election Campaign Act. Your response of July 24, 1986 outlined the specific requirements which are a prerequisite to Commission action on the matter.

Enclosed is a formal complaint prepared in compliance with the specific requirements outlined in your July 24, 1986 letter. I trust the Commission now can undertake a full investigation of the matter described therein.

Your assistance in this matter is appreciated.

Yours truly,

Richard Planavsky

Richard Planavsky, Commissioner
of Administration and Finance

RP:dmc

Enclosure

To cge

9-22-86

SEP 22 P 4:43

Rec. 9-22-86
Cick

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SEP 22 P 3:02

210 155
MWR 2248

FEDERAL ELECTION COMMISSION
WASHINGTON, D. C.

In the Matter of the Complaint of
RICHARD PLANAVSKY,

Complainant,

-against-

MORGAN GUARANTY TRUST COMPANY
and
ROBERT E. WHELAN,

Respondents.

STATE OF NEW YORK)
COUNTY OF ERIE : ss:-
CITY OF BUFFALO)

AFFIDAVIT

SEP 22 10:45:51

RICHARD PLANAVSKY, being duly sworn, deposes and says:

1. I am the Commissioner of Administration and Finance for the City of Buffalo, New York, and as such, I supervise and manage the City's Division of the Budget, Division of Management Services, Division of Labor Relations, Division of Parking Enforcement, and Division of the Treasury.

2. My business address is Room 203 City Hall, Buffalo, New York, 14202. My business telephone is (716) 855-5710.

3. Upon information and belief, the Respondent, **MORGAN GUARANTY TRUST COMPANY**, is a bank or corporation subject to the provisions of Chapter 14 of Title 2 of the United States Code. Its business address is 15 Broad Street, New York City, New York, 10015.

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4. The Respondent, **ROBERT E. WHELAN**, is the elected Comptroller of the City of Buffalo, New York. His business address is Room 1225 City Hall, Buffalo, New York, 14202.

5. The Respondent, **ROBERT E. WHELAN**, for the last several years, has engaged the services of the other Respondent, **MORGAN GUARANTY TRUST COMPANY**, to act as the financial advisor to the City in matters relating to the sale of bonds and notes.

6. The cost of such services to the City of Buffalo during fiscal year 1985-86 was \$94,791.00.

7. The allegations which I make herein are based upon the following sources of information, copies of which are attached hereto:

- (a) The financial disclosure statement filed by the Respondent, **ROBERT E. WHELAN**, with the New York State Board of Elections (Exhibit "1");
- (b) The preliminary official statement of the City, in connection with the sale of City of Buffalo bonds (Exhibit "2", pp. 1 and 59 only);
- (c) The statements of the Respondent, **ROBERT E. WHELAN**, contained in a news-

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paper story in the July 9, 1986 edition
of the Buffalo News (Exhibit "3").

8. It is my complaint to Your Honorable Commission that the Respondents have combined during the early part of 1986 to solicit, to receive and to contribute things of value in New York City for election campaign purposes in apparent violation of Section 441(b) of Title II of the U.S. Code, and of other applicable provisions.

9. It is my request that Your Honorable Commission investigate this matter to determine if such a violation has occurred and to take appropriate action thereon.

Richard Planavsky

RICHARD PLANAVSKY

Subscribed and Sworn to before me

this 19 day of September, 1986.

John A. Mazusa

Commissioner of Deeds, Buffalo, N. Y.
My commission expires 12/31/86

JJMcL/sc

STATE OF NEW YORK
BOARD OF ELECTIONS

FINANCIAL DISCLOSURE STATEMENT

IDENTIFICATION

FRIENDS OF BOB WHELAN

Full name of Candidate or Committee — print or type

Sta. 700, 37 Franklin Street

Address — number and street

Buffalo,

New York

14202

City

State

Zip

☐ Check box
if address has
changed since
last report

ID Number — if known

Comptroller, City of Buffalo

Office and District

Democrat

Name of Political Party

TYPE OF REPORT

Check Appropriate Boxes

Date of Election _____

Statement is being filed by:

☐ Candidate☒ Political
Committee☐ Party
Committee☐ Constituted
Committee

Statement reports activities for:

☐ One Candidate☐ More than one CandidateStatement is a Termination Report (you cannot terminate if any funds or debts remain): ☐Statement is an Amendment Report ☐

Amends report previously submitted for period _____

Date

to

Date

REPORTING PERIOD SCHEDULES

Statement period — from

1/15/86

to

7/15/86

Date

Date

Check Appropriate Box

☐ 32 day Pre Primary☐ 32 day Pre General☐ 32 day Pre Special☐ Periodic Jan. 15, 19____☐ 11 day Pre Primary☐ 11 day Pre General☐ 11 day Pre Special☒ Periodic July 15, 1986☐ 27 day Post Primary*☐ 27 day Post General*☐ 27 day Post Special*

*Campaign material must be submitted with 27 day Post-Election statements

VERIFICATION

Must have original signature — sign in pen

ITEMIZED STATEMENT

I state that the information contained in this statement pursuant to the Election Law, is in all respects true and complete to the best of my knowledge, information and belief.

Signature

THOMAS J. CASEY

Treasurer

Title

7/15/86

Date Signed

(Proceed to complete this report on the following pages and schedules.)

IN-LIEU-OF STATEMENT (IF APPLICABLE)

I state that neither the aggregate receipts nor the aggregate expenditures, has exceeded or will exceed one thousand dollars in connection with this campaign.

Signature

Title

Date Signed

(If you qualify to submit this IN-LIEU-OF STATEMENT, you may now STOP,
SIGN and SUBMIT it as your report.)

Any false information made in this statement may be punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law. For further information, contact the New York State Board of Elections or your local Board of Elections.

NEW YORK STATE BOARD OF ELECTIONS
99 WASHINGTON AVENUE
ALBANY, NEW YORK 12210

EXHIBIT "1"

9604022340

GENERAL INSTRUCTIONS

This financial statement must be prepared in ink or typed. A statement prepared in pencil may not be accepted for filing. The form is designed for use by either a Candidate or a Committee. Entries on the statement should come from the accounting records maintained by the preparer. Refer to the instructions in the financial disclosure guide booklet, regarding the jurisdiction to which this report must be filed.

The ID Number will be assigned by the State Board of Elections to all candidates and committees filing with the State Board. It should be shown on all reports filed and referred to on all correspondence and inquiries addressed to the State Board of Elections.

This statement must be submitted for each appropriate filing period, and must report the activities of each period itself — separate periods may not be combined into a single report.

All pertinent sections and supporting schedules must be completed — except that an "In-Lieu-Of" statement may be submitted in only the following cases:

- a. A Candidate may submit an "In-Lieu-Of" statement if less than \$1,000 will be expended for the entire campaign.
- b. A Committee may submit an "In-Lieu-Of" statement if less than \$1,000 will be expended for the entire campaign, and the committee is supporting only one candidate, and that Candidate has authorized the Committee to engage in the campaign.

The verification section, whether it be the Itemized Statement or the In-Lieu-Of Statement, must have an original signature.

Contributions: Monetary contributions include all cash, checks, money orders, etc., received, and they must be detailed in *Schedule 2A*.

Non-cash contributions are campaign contributions accepted via property received, certain personal services or facilities provided for campaign use. These must be detailed and valued in the appropriate section of *Schedule 2B*. Line 2B and Line 5B are offset against each other, so that the cash fund balance will not be distorted for purposes of reporting.

Transfers in and Transfers out: For purposes of financial statement reporting, transfers are deemed to occur by passing a sum of money from any campaign fund held by any Committee, to any campaign fund held by any other Committee or other Committee's Candidate. Certain of these interchanges, while considered transfers for reporting purposes, may effect maximum contribution limitations. Refer to the Election Law or to the instructional guide booklet for the legal considerations involved.

The Status of Campaign Costs section must be completed for each report submitted. It accumulates campaign costs for this election campaign, and should not accumulate costs of more than a single election campaign. This campaign is as indicated on the Date of Election line on Page 1, in the section captioned Type of Report.

The Allocation of Campaign Costs section must be completed for each report submitted. (Note that it need not be completed in the instance of supporting only one Candidate, as it is obvious that the entire cost of such campaign is chargeable to that single Candidate.) The campaign costs shall be allocated among the Candidates in accord with any percentage based upon reasonable standards established by the Committee. Inasmuch as this section allocates the accumulating totals of campaign costs throughout the campaign, from Line 31 of the Status of Campaign Costs section, it thereby represents the total financial support given to each Candidate from the beginning of the campaign through the period covered by this report.

SUMMARY OF RECEIPTS AND EXPENDITURES THIS PERIOD

1. Cash balance at beginning of period—must be same as ending balance Line 7 of preceding report		\$29,039.55
2. Receipts during period:		
A. Monetary contributions received (Schedule 2A)	21,490.00	
B. Non-cash contributions—must be same as Line 5B (Schedule 2B)	400.00	
C. Total contributions—Line 2A plus Line 2B	21,890.00	
D. Loan(s) received (Schedule 2D)	0.00	
E. Transfers in (Schedule 2E)	0.00	
F. Refunds of campaign expenditures (Schedule 2F)	0.00	
G. Other receipts (Schedule 2G)	926.84	
3. Add Lines 2C through 2G		22,816.84
4. Add Line 1 plus Line 3		51,856.39
5. Expenditures during period:		
A. Campaign expenses paid (Schedule 5A)	8,763.28	
B. Non-cash contribution adjustment—must be same as Line 2B	400.00	
C. Contributions refunded to contributors (Schedule 5C)	0.00	
D. Loan(s) repayments (Schedule 5D)	0.00	
E. Transfers out (Schedule 5E)	10,567.37	
F. Non-campaign housekeeping expenses—only a Party Committee or a Constituted Committee may have an entry on this line—to report ordinary activities which are not for the express purpose of promoting any Candidate	0.00	
6. Add Line 5A through 5F		19,730.65
7. Cash balance at end of period—Line 4 less Line 6		32,125.74

STATUS OF LOANS

8. Loan(s) balance at beginning of period—must be same as ending balance Line 14 of preceding report		0.00
9. Loan(s) received this period—from Line 2D		0.00
10. Add Line 8 plus Line 9		0.00
11. Loan(s) repayments this period—from Line 5D	0.00	
12. Loan(s) forgiven this period (Schedule 12)	0.00	
13. Add Line 11 plus Line 12		0.00
14. Loan(s) balance at end of period—Line 10 less Line 13		0.00

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- ## STATUS OF CONTRIBUTIONS

- ## STATUS OF CAMPAIGN COSTS

- ALLOCATION OF CAMPAIGN COSTS TO CANDIDATE(S)**

[illegible]

Statement period — from 1/15/86 to 7/15/86
Date Date

NON-CASH CONTRIBUTIONS

SCHEDULE 2B

DATE	FULL NAME	MAILING ADDRESS	PURPOSE OF PAYMENT OR DESCRIPTION OF ITEM	AMOUNT PAID OR VALUE OF ITEM
Campaign expenses paid by:				
Property given by:				
Services or facilities provided by:				
6/16/86	Morgan Guaranty Co.	23 Wall Street New York, N.Y. 10015	secretarial services, handling phone calls for fundraiser in N.Y.C. on 6/16/86	150.00
6/16/86	Packard Press	475 Park Avenue South New York, N.Y. 10016	postage and stationery	250.00
(FORGIVENESS OF LOANS OR UNPAID BILLS SHOULD NOT BE SHOWN ON THIS SCHEDULE—SEPARATE SCHEDULES ARE USED FOR SUCH TRANSACTIONS)				TOTAL 400.00

REFUNDS OF CAMPAIGN EXPENDITURES

SCHEDULE 2F

DATE RECEIVED	FULL NAME	MAILING ADDRESS	AMOUNT REFUNDED
TOTAL			0.00

OTHER RECEIPTS

SCHEDULE 2G

DATE RECEIVED	FULL NAME	MAILING ADDRESS	AMOUNT	TYPE OF RECEIPT
2/28/86	Chase Lincoln First	One Lincoln First Square Rochester, New York 14643	175.66	Int. CD Acct. J #67005769 &
3/31/86	Chase Lincoln First	One Lincoln First Square Rochester, New York 14643	151.19	Int. CD Acct. Marc
4/30/86	Chase Lincoln First	One Lincoln First Square Rochester, New York 14643	146.30	Int. CD Acct. Apri
5/31/86	Chase Lincoln First	One Lincoln First Square Rochester, New York 14643	151.19	Int. CD Acct. May
6/30/86	Chase Lincoln First	One Lincoln First Square Rochester, New York 14643	146.30	Int. CD Acct. June
1-7/86	Key Bank	17 Court Street Buffalo, New York 14202	156.20	Int. Savings #530-007198
TOTAL			926.84	

85040322314

Statement period — from 1/15/86 to 7/15/86
Date Date

LOANS RECEIVED

SCHEDULE 2D

DATE RECEIVED	FULL NAME	MAILING ADDRESS	AMOUNT
---------------	-----------	-----------------	--------

SCHEDULE 2D — List any loans received during the reporting period. A copy of the evidence of indebtedness for each loan must be attached to the statement. If the loan was received from a lending institution, there must be included on the evidence of indebtedness the name and address of the obligor of the loan or any other person who endorses, co-signs, guarantees, or otherwise provides security for such loan. The name of this person should also be recorded on the schedule under the name of the lending institution.

(EVIDENCE OF INDEBTEDNESS FOR LOANS LISTED ABOVE MUST BE ATTACHED)			TOTAL 0.00

LOAN REPAYMENTS

SCHEDULE 5D

DATE PAID	FULL NAME	MAILING ADDRESS	AMOUNT	DATE OF LOAN
			TOTAL 0.00	

LOANS FORGIVEN

SCHEDULE 12

DATE FORGIVEN	FULL NAME	MAILING ADDRESS	AMOUNT	DATE OF LOAN
(EVIDENCE FROM LENDERS INDICATING FORGIVENESS MUST BE ATTACHED)			TOTAL 0.00	

86040522345

Statement period — from 1/15/86 to 7/15/86
Date Date

MONETARY CONTRIBUTIONS

SCHEDULE 2A

List all monetary contributions which exceed \$99. The date of receipt, full name and mailing address must be given. Do not report receipts from other political committees on this schedule.

Identify contributions from relatives or corporations by placing a check-mark in the appropriate column. For this purpose, a relative is the candidate's child, parent, grandparent, brother, sister, and the spouse of any of those.

It is not required that contributions of less than \$100 be individually listed. These contributors may be grouped together in a single amount and reported on the line provided in the summary section of this schedule. However, if a contributor in this period has contributed an amount, which when added to his previous contributions for this campaign now exceeds \$99, such contributor must now be individually listed.

For each listed contributor, who has made previous contributions to this campaign, show the total previous contributions in the box provided for this purpose.

DATE RECEIVED	Relative	Corp.	FULL NAME	MAILING ADDRESS	AMOUNT	PREVIOUS AMOUNTS -IF ANY
1/17/86			Morgan Companies New York PAC	23 Wall Street New York, New York 10015	200.00	
1/17/86			Stephen Zappia	20 York Street Buffalo, New York 14213	150.00	
2/6/86			Shearson Lehman Peter A. Avalone	World Financial Center New York, New York 10285	200.00	
2/26/86		X	Prudential Bache	4900 Merrick Road Massapequa Park, N.Y. 11762	500.00	
2/26/86			Edward C. Cosgrove	237 Main Street, Ste. 1000 Buffalo, New York 14202	1,000.00	
4/14/86		X	E.F. Hutton CO.	One Battery Park Plaza New York, New York 10004	500.00	
5/1/86			William J. Gillard	52 Brush Hill Rd. Kinnelon, N.J. 07405	1,000.00	
5/2/86			Stephen D. Goddard	333 South Grand, Suite 2400 Los Angeles, Cal. 90071	1,000.00	
5/2/86			Robert F. Goldhammer	74 Arlington Street Winchester, MA. 01890	1,000.00	
5/17/86			Peter D. Goodson	52 Prescott Avenue Bronxville, New York 10706	1,000.00	
4/30/86			A. H. Gordon	10 Gracie Square New York, New York 10028	1,000.00	
4/7/86			David M. McAuliffe	736 Mildred Street Teaneck, N.J. 07666	300.00	
4/16/86			Paul A. Maffeo	2600 Seattle First Bldg. Seattle, Washington 98154	300.00	
6/9/86			William P. Maloney	New York, New York	300.00	
4/12/86			Richard C. Makin	New York, New York	300.00	
3/21/86			John A. McColl	5942 Henley Drive San Diego, Cal. 92120	300.00	
3/24/86			Joseph W. Martin, Jr.	2 Hesketh Court Menlo Park, CA. 94025	300.00	
4/1/86			Kenneth C. Markley	1225 Carriage Lane La Grange, Il. 60525	300.00	
5/12/86			Joseph P. Markey	472 Tenth Street Brooklyn, New York 11215	300.00	
Sub-TOTAL					9,950.00	

SUMMARY (To be completed on last page of schedule 2A)

Total unitemized contributions this period _____

Total itemized contributions this period — all pages _____

Total contributions received this period _____

DO NOT COMPLETE UNLESS THIS IS LAST CONTRIBUTION PAGE

Over

95040022346

Statement period — from 1/15/86
Date7/15/86
Date

MONETARY CONTRIBUTIONS

SCHEDULE 2A

DATE RECEIVED	Relative	Corp.	FULL NAME	MAILING ADDRESS	AMOUNT	PREVIOUS AMOUNTS -IF ANY
4/29/86			Peter G. Mastrangelo	New York, New York	300.00	
3/24/86			Carter C. Mathies	1245 S.W. 84th Avenue Portland, Oregon 97225	300.00	
3/24/86			Joseph P. Martorella	81 Lahey Street New Hyde Park, New York 11040	300.00	
3/30/86			Bernard C. Grigsby, II	P.O. Box 645, Wall St. Station New York, New York 10005	700.00	
3/31/86			T. G. Carbonar	12115 San Vicente Blvd. West Los Angeles, CA. 90049	700.00	
6/3/86			Raymond Matison	127 Ralston Avenue South Orange, N.J. 07079	300.00	
6/16/86			Sandra Mokuvus Bellush	c/o Chemical Bank, 380 Madison Ave., N.Y., N.Y. 10017	200.00	
6/16/86			George Borris, Frank Soltis & Greg Hickock	c/o Chase PAC, 1 Chase Man- hattan Plaza, N.Y., N.Y. 10081	600.00	
6/16/86			Robert F. Grimmig	New York, New York	200.00	
6/16/86			Maurice Sonnenberg	New York, New York	200.00	
6/16/86			William N. Hudson, Jr.	4985 Sheridan Drive Williamsville, N.Y. 14221	200.00	
6/13/86			Stephen Kohlmann	26 Cedar Avenue Coram, New York 11727	100.00	
6/10/86			Raymond V. DiScala	24 Harbor Hill Drive Lloyd Harbor, N.Y. 11743	100.00	
6/12/86		X	First Albany Corp.	41 State St., P.O. Box 52 Albany, N.Y. 12201	200.00	
6/17/86			Larry R. Hammond	167c New Freedom Berlin, N.J. 08009	200.00	
6/16/86			John K. Dierkes	285 Riverside Drive, 13C New York, New York 10025	200.00	
6/16/86			Amos T. Reason	26 Ox Bow Lane Summit, N.J. 07901	200.00	
6/16/86		X	I.D.B.I. Managers, Inc.	175 Water Street New York, New York 10038	200.00	
6/16/86			Dillon Read Political Action Committee	19 Rector Street, 8th Floor New York, New York 10006	400.00	
6/11/86		X	Rogers & Wells, P.C.	200 Park Avenue New York, New York 10166	400.00	
6/5/86			Robert B. Nolan, Jr.	20 Park Avenue Bronxville, N.Y. 10708	100.00	
6/16/86		X	United Daniels Securities, Inc.	170 Broadway, Suite 1200 New York, New York 10038	400.00	
Sub - TOTAL					16,450.00	

SUMMARY (To be completed on last page of schedule 2A)

Total unitemized contributions this period _____

Total itemized contributions this period — all pages _____

Total contributions received this period _____

DO NOT COMPLETE UNLESS THIS IS LAST CONTRIBUTION PAGE

Statement period — from 1/15/86 to 7/15/86
Date Date

MONETARY CONTRIBUTIONS

DATE RECEIVED	Relative	Corp.	FULL NAME	MAILING ADDRESS	AMOUNT	PREVIOUS AMOUNTS -IF ANY
6/12/86			Committee for Effective Government	Morgan PAC New York, New York	500.00	
6/11/86			Walter T. Kicinski	32 Woodhollow Road Lawrenceville, N.J. 08648	200.00	
6/16/86			John Maus	42 W. 87th Street, No. 48 New York, New York 10024	100.00	
6/14/86			Courtney A. Haff	16 Hudson Street New York, New York 10013	200.00	
6/10/86			Bernard R. Bober	16 Colts Foot Glen Road Saddle River, N.J. 07458	250.00	
6/10/86			Cheryl E. Jones	215 West 91 Street, Apt. 64 New York, New York 10024	200.00	
6/3/86			Chester J. Straub	One Citicorp Center, 153 E. 53rd St., N.Y., N.Y. 10022	200.00	
6/16/86			William Pinakiewicz	249 Kimball Avenue Westfield, N.J. 07090	800.00	
6/16/86			Jeremiah C. Whalen	503 Seabrook Drive Williamsville, N.Y. 14221	200.00	
6/9/86			Burt R. Ehrlich	80 Pine Street New York, New York 10005	250.00	
6/17/86			Gedale Bob Horowitz	One New York Plaza New York, New York 10004	400.00	
6/16/86			Nelson D. Civello	140 Broadway New York, New York	200.00	
6/18/86			Ronald E. Curvin	140 Broadway New York, New York	200.00	
6/9/86			John H. Dyson	c/o Wakefield National, Inc. 2 Park Ave., N.Y., N.Y. 10016	500.00	
Miscellaneous contributions					140.00	
6/11/86			J. Chester Johnson	32 Woodhollow Road Lawrenceville, N.J. 08648	200.00	
6/23/86		X	Brown & Wood, P.C.	One World Trade Center New York, New York 10048	500.00	
TOTAL					21,490.00	

SUMMARY (To be completed on last page of schedule 2A)

Total unitemized contributions this period

140.00

Total itemized contributions this period — all pages

21,350.00

Total contributions received this period

21,490.00

DO NOT COMPLETE UNLESS THIS IS LAST CONTRIBUTION PAGE

850402348

Statement period — from 1/15/86 to 7/15/86
Date Date

CAMPAIGN EXPENSES PAID

SCHEDULE 5A

DATE PAID	FULL NAME	MAILING ADDRESS	AMOUNT	PURPOSE OF DISBURSEMENT
1/22/86	Amherst Democratic Committee	333 Dick Road Depew, New York 14043	10.00	raffle tickets
1/24/86	Accurate Campaign Lists	3997 Genesee Street Cheektowaga, New York 14225	250.00	contribution lists
1/24/86	Wiechec's Social Club	1748 Clinton Street Buffalo, New York	65.00	4 pg. ad program
1/24/86	Sunrise Press	574 Fillmore Avenue Buffalo, New York 14212	211.60	printing of tickets
1/27/86	Mercy Hospital Foundation	565 Abbott Road Buffalo, New York 14220	100.00	2 tickets
1/27/86	The Cane Fund	Grand Island, New York	500.00	donation
1/30/86	Blackthorns	245 Abbott Road Buffalo, New York 14220	15.00	1986 annual dues
1/30/86	Friends of Sheriff Tom F. Higgins	56 Mumford Avenue Buffalo, New York 14220	50.00	advertising
1/30/86	Cynthia A. Wojtanik	76 Wood Street Lackawanna, New York 14218	75.00	secretarial services, Jan.
1/31/86	New Democratic Coalition	New York, New York	100.00	1 ticket
2/4/86	U.S. Postmaster	Niagara Square Station Buffalo, New York 14202	44.00	2 rolls of stamps
2/4/86	N.Y. Telephone Co.	1600 Rand Building Buffalo, New York 14203	91.16	car phone 1/25 - 2/24
2/6/86	Robert E. Whelan	1111 Amherst Street Buffalo, New York 14216	265.00	Jan. out-of-pocket exp.
2/6/86	Kathy Gregorie	156 Weyand Street Buffalo, New York 14210	37.80	reimbursement scrapbook
2/10/86	Amherst Gaelic League	5707 Main Street Williamsville, New York 14221	120.00	10 tickets
2/14/86	Bishop Timon High School	601 McKinley Parkway Buffalo, New York 14220	25.00	4 page - advertising
2/21/86	Easter Seal Society	974 Kenmore Avenue Buffalo, New York 14216	50.00	5 tickets
2/21/86	U.S. Postmaster	Niagara Square Station Buffalo, New York 14202	66.00	3 rolls stamps
2/26/86	Larry Goldberg	Buffalo, New York	65.00	reimbursement St. Pat cards
2/28/86	Cynthia A. Wojtanik	76 Wood Street Lackawanna, New York 14218	75.00	secretarial services - Feb.
2/28/86	Benefit for Tom & Jane O'Malley	245 Abbott Road Buffalo, New York 14220	60.00	4 tickets
2/28/86	The Hyatt Regency	2 Fountain Plaza Buffalo, New York 14202	270.60	luncheon meeting 2/25
3/4/86	Forum Restaurant	Buffalo, New York	21.74	breakfast meeting 3/4
3/5/86	Robert E. Whelan	1111 Amherst Street Buffalo, New York 14216	215.00	out-of-pocket exp. - Feb.
3/11/86	Internal Revenue Service	Lowell Street Andover, Mass.	30.00	payment of 1120 POL tax
3/12/86	Vilardo Printing	326 Connecticut Street Buffalo, New York 14213	653.40	letterhead & stationery
Sub - TOTAL			3,466.30	

93010522349

Payment period — from 1/15/86
Date

 to 7/15/86
Date

TRANSFERS—IN

SCHEDULE 2E

DATE RECEIVED	FULL NAME	MAILING ADDRESS	AMOUNT
TOTAL			0.00

TRANSFERS OUT

SCHEDULE 5E

DATE PAID	FULL NAME	MAILING ADDRESS	AMOUNT
1/24/86	Chase Lincoln First Bank	One Lincoln First Square Rochester, New York 14643	10,567.37
TOTAL			10,567.37

95040522350

Statement period — from 1/15/86 to 7/15/86
Date Date

CAMPAIGN EXPENSES PAID

SCHEDULE 5A

DATE PAID	FULL NAME	MAILING ADDRESS	AMOUNT	PURPOSE OF DISBURSEMENT
DO NOT report Transfers Out, use Schedule 5E				
3/24/86	Buffalo Telephone Co.	1600 Rand Building Buffalo, New York 14203	85.48	car phone 2 mos.
3/31/86	Erie County Committee Conservative Party N.Y.	263 Statler Building Buffalo, New York 14202	80.00	2 tickets
3/31/86	Cynthia A. Woitanik	76 Wood Street Lackawanna, New York 14218	75.00	secretarial services - Ma
3/31/86	Erie County Committee - Conservative Party N.Y.	263 Statler Building Buffalo, New York 14202	45.00	1/4 pg. ad
3/31/86	Zone 16 Democratic Comm.	232 E. Amherst Street Buffalo, New York 14214	5.00	5 raffle tickets
4/7/86	Robert E. Whelan	1111 Amherst Street Buffalo, New York 14216	205.00	Mar. out of pocket expen.
4/7/86	University District Democratic Club	163 Marth Avenue Buffalo, New York 14215	12.00	2 tickets
4/7/86	University District Democratic Club	163 Marth Avenue Buffalo, New York 14215	15.00	1/4 pg. ad
4/8/86	Committee to Re-Elect Joanne I. Skorka	546 Richmond Avenue Buffalo, New York 14222	20.00	1 ticket
4/8/86	Trocaire College	110 Red Jacket Parkway Buffalo, New York 14220	35.00	1 ticket
4/14/86	Frontier Democratic Club	210 Voorhees Avenue Buffalo, New York 14214	25.00	1/4 page ad
4/14/86	Community Action Organi- zation of Erie Co.	70 Harvard Place Buffalo, New York 14209	18.50	1/8 pg. ad
4/14/86	Buffalo-Dortmund Sister City Committee	91 Pine Street East Aurora, N.Y. 14052	15.00	3 tickets
4/15/86	U.S. Postmaster	Niagara Square Buffalo, New York 14202	88.00	4 rolls of stamps
4/18/86	Greater Buffalo Demo- cratic Women's Club	9040 Main Street Clarence, New York 14031	24.00	2 tickets
4/18/86	Frontier Democratic Club	24 Ross Avenue Buffalo, New York 14207	40.00	2 tickets
4/23/86	North Buffalo Jaycees	P.O. Box 252 Buffalo, New York 14216	15.00	1/4 pg. ad
4/23/86	Hillery Memorial Scholarship Foundation	601 McKinley Parkway Buffalo, New York 14220	10.00	honorary patron ad
4/30/86	W.N.Y. Chapter of Arthritis Foundation	Niagara Falls Blvd. Tonawanda, New York 14150	250.00	donation
5/1/86	Ronald McDonald House of Buffalo	780 West Ferry Street Buffalo, New York 14222	50.00	special patron ad
5/1/86	Mercy Hospital Men's Sustaining Society	565 Abbott Road Buffalo, New York 14220	20.00	membership due & 3 raffle tick
5/6/86	Robert E. Whelan	1111 Amherst Street Buffalo, New York 14216	270.00	out-of-pocket expenses-April
Sub -TOTAL			4,869.28	

SUMMARY (To be completed on last page of schedule 5A)

Total unitemized expenses this period _____

Total itemized expenses this period — all pages _____

Total campaign expenses expended this period _____

DO NOT COMPLETE UNLESS THIS IS LAST CAMPAIGN EXPENSE PAGE

Statement period — from 1/15/86 to 7/15/86
Date Date

CAMPAIGN EXPENSES PAID

SCHEDULE 5A

DATE PAID	FULL NAME	MAILING ADDRESS	AMOUNT	PURPOSE OF DISBURSEMENT
DO NOT report Transfers Out, use Schedule 5E				
5/7/86	Erie County Democratic Town Chairmen's Assoc.	87 Clark Street Orchard Park, N.Y. 14127	20.00	1 ticket
5/7/86	W.N.Y. Chapter of Arthritis Foundation	Niagara Falls Blvd. Tonawanda, New York 14150	80.00	1 ticket
5/19/86	Puerto-Rican American Community Association	110 Hartwell Road Buffalo, New York 14216	25.00	4 pg. ad
5/20/86	Preservation Coalition of Erie County	20 Angle Street Buffalo, New York 14214	15.00	membership dues
5/22/86	Lotus Club	5 East 66th Street New York, New York 10021	500.00	deposit for room-fundraise in N.Y.C. on 6/16/86
5/28/86	Cynthia A. Wojtanik	76 Wood Street Lackawanna, New York 14218	150.00	secretarial services, Apr
5/28/86	Inner City Concerned Citizens	56 North Parade Avenue Buffalo, New York 14211	25.00	1 ticket
5/28/86	Frontier Democratic Club	24 Ross Avenue Buffalo, New York 14207	15.00	membership dues
5/29/86	Robert E. Whelan	1111 Amherst Street Buffalo, New York 14216	370.00	out-of-pocket expenses, May
5/30/86	Women's Division of Erie Co. Democratic Committee	220 Delaware Avenue, #425 Buffalo, New York 14202	20.00	4 pg. ad
5/30/86	Citizens for Hoyt	Buffalo, New York	30.00	1 ticket
6/5/86	Committee to Re-Elect Mazurek	1202 Broadway Buffalo, New York 14212	40.00	2 tickets
6/5/86	Erie ARC	Buffalo, New York	25.00	contribution Walkathon 6/7
6/6/86	U.S. Air	Greater Bflo. Int. Airport Cheektowaga, N.Y. 14225	672.00	Airfare for committee for fundraiser in N.Y.C. 6/16
6/9/86	U.S. Postmaster	Niagara Square Station Buffalo, New York 14202	44.00	2 rolls stamps
6/9/86	Nicholas Sargent	15 Court Street Buffalo, New York 14202	49.00	reimbursement, c expenses for N.Y.C. fundraiser 6/16
6/17/86	Robert E. Whelan	1111 Amherst Street Buffalo, New York 14216	620.00	reimbursement for hotel, meal transportation N.Y.C. fundrais
6/17/86	Lotus Club	5 East 66th Street New York, New York 10021	935.00	balance due 6/ N.Y.C. fundrais
Sub-TOTAL			8,504.28	

SUMMARY (To be completed on last page of schedule 5A)

Total unitemized expenses this period _____

Total itemized expenses this period — all pages _____

Total campaign expenses expended this period _____

DO NOT COMPLETE UNLESS THIS IS LAST CAMPAIGN EXPENSE PAGE

BOARD OF ELECTIONS
ERIE COUNTY, N.Y.

JUN 4 4 55 PM '86

FRIENDS OF BOB WHELAN
c/o 700 Cathedral Park Tower
37 Franklin Street
Buffalo, New York 14202

May 30, 1986

Democratic Headquarters
Erie County Board of Elections
134 West Eagle Street
Buffalo, New York 14202

RE: FRIENDS OF BOB WHELAN

Dear Sirs:

Per your instructions in Paragraph "A" of Campaign Finance Guide for Candidates and Political Committees, please be advised that five contributions in the amount of \$1,000 each have been received by our committee, which are as follows:

1) William J. or Dorothy D. Gillard	\$1,000.00
2) Stephen D. and Deborah G. Goddard	1,000.00
3) Robert F. Goldhammer	1,000.00
4) Peter D. and Terry D. Goodson	1,000.00
5) A. H. Gordon	1,000.00

I have enclosed photocopies of those checks.

If any additional information is requested, please do not hesitate to contact me.

Very truly yours,

FRIENDS OF BOB WHELAN

Cynthia A. Wojtanik

BY

Cynthia A. Wojtanik

CW
Enclosure

9501052354

No. 3657

A. H. GORDON
10 Grace Square
New York, NY 10028

April 30 1986

PAY TO THE ORDER OF Friends of Bob Whelan \$ 1,000.00

One Thousand and no/100 DOLLAR

THE BANK OF NEW YORK

60 WALL STREET, NEW YORK, N.Y. 10005

Ad In

⑆036576⑆ ⑆021000018⑆

⑈24 8606⑈

WILLIAM J. OR DOROTHY D. GILLARD
52 BRUSH HILL RD. PH. 201-488-2488
KINNELON, NJ 07405

2207

Pay to the Order of

Friends of Bob Whelan

Date 5/1 1986

\$ 1,000 -

One Thousand

Dollar

U.S. Trust

UNITED STATES TRUST CO.
OF NEW YORK
45 Wall Street
New York, N.Y. 10005



MEMO

William J. Gillard

⑆021001318⑆

⑈66 4065 3⑈ 2207

WILLIAM J. GILLARD

Premium Account

STEPHEN D. GODDARD
DEBORAH GODDARD
333 SOUTH GRAND, SUITE 2400
LOS ANGELES, CA 90071

316

May 2 1986 25-30/440

PAY TO THE ORDER OF

Friends of Bob Whelan

\$ 1000 ⁰⁰/₁₀₀

One Thousand Dollars

DOLLAR

BANK ONE.

BANK ONE OF COLUMBUS, MA
Columbus, Ohio 43271

MEMO

Stephen D. Goddard

⑆044000804⑆

⑈4229052034⑈ 0316

95040522355

ROBERT F. GOLDHAMMER
74 Arlington Street
Winchester, MA 01890

2666

PAY TO THE ORDER OF

Frank J. Goldhamer 1976 5.15
Five thousand and no/100 5,150.00
Five thousand and no/100 DOLLAR

① BANK OF NEW ENGLAND
BOSTON, MASSACHUSETTS

Memo:

R. F. Goldhamer

⑆01000138⑆ 1168 38 28 2666

PETER D. GOODSON
TERRY D. GOODSON
32 PRESCOTT AVE.
BRONXVILLE, NY 10708

5553

Pay to the
Order of

Friends of St. Elizabeth May 17 1976 5.15
One thousand and no/100 1,150.00
One thousand and no/100 DOLLAR

U.S. Trust

UNITED STATES TRUST CO.
OF NEW YORK
48 Wall Street
New York, N.Y. 10005

Memo:

Peter Goodson

⑆02100138⑆ 61 0325 11 5553

35040322356

PRELIMINARY OFFICIAL STATEMENT DATED AUGUST 5, 1986

NEW ISSUES

Ratings: See "Ratings" herein

In the opinion of Bond Counsel, interest on the Bonds is exempt, under existing statutes, from federal income taxes and, under existing statutes, interest on the Bonds is exempt from personal income taxes of New York State and its political subdivisions, including The City of New York. For information regarding certain legislation which may affect the exemption of interest on the Bonds from federal income taxation, see "Pending Federal Tax Legislation", herein.

\$55,424,000***City of Buffalo, New York**

Dated: August 1, 1986

Due: February 1, as shown below

**\$40,684,000 General Improvement Serial Bonds—1986-D and
\$2,390,000 General Improvement Water Supply Serial Bonds—1986-F**

Series D Amount	Series F Amount	Maturity	Interest Rate	Price	Series D Amount	Maturity	Interest Rate	Price
\$ 300,000		1987	%	%	\$1,160,000	2003		
1,714,000	\$160,000	1988			1,160,000	2004		
1,710,000	160,000	1989			1,185,000	2005		
1,725,000	160,000	1990			1,205,000	2006		
1,900,000	160,000	1991			705,000	2007		
1,860,000	135,000	1992			705,000	2008		
1,920,000	135,000	1993			705,000	2009		
1,965,000	135,000	1994			730,000	2010		
2,010,000	155,000	1995			750,000	2011		
2,115,000	155,000	1996			750,000	2012		
2,065,000	155,000	1997			750,000	2013		
2,100,000	165,000	1998			775,000	2014		
2,115,000	175,000	1999			775,000	2015		
2,070,000	180,000	2000			775,000	2016		
1,680,000	180,000	2001						
1,305,000	180,000	2002						

\$12,350,000 School Serial Bonds—1986-E

Amount	Maturity	Interest Rate	Price	Amount	Maturity	Interest Rate	Price
\$ 535,000	1988	%	%	\$ 600,000	1998	%	%
535,000	1989			600,000	1999		
535,000	1990			600,000	2000		
535,000	1991			600,000	2001		
580,000	1992			600,000	2002		
590,000	1993			680,000	2003		
660,000	1994			680,000	2004		
660,000	1995			680,000	2005		
660,000	1996			680,000	2006		
660,000	1997			680,000	2007		

Accrued Interest to be added

The Bonds will be issued in fully registered form in denominations of \$5,000 or any integral multiple thereof for any single maturity, except that one bond for the 1988 maturity of the General Improvement Serial Bonds—1986-D may be issued in a denomination which is or includes an amount less than the authorized multiple. Principal, when due, will be payable at the principal corporate trust office of The Chase Manhattan Bank, N.A., New York, New York, the Fiscal Agent for the Bonds. Interest on the Bonds will be payable on February 1, 1987, August 1, 1987 and semi-annually thereafter on February 1 and August 1 in each year to maturity. Such interest is payable by check mailed on each such interest payment date to the registered owner at his address as shown on the registration books of the Fiscal Agent as of the fifteenth day of the month next preceding each such interest payment date. The Bonds maturing in the years 1987 through 1996 are not subject to prior redemption. The Bonds maturing in 1997 and thereafter are redeemable at the option of the City on February 1, 1996, and thereafter on any interest payment date at declining redemption prices not exceeding 101%, as described herein.

The Bonds will constitute general obligations of the City and will contain a pledge of its faith and credit for the payment of the principal of and interest on the Bonds and all the taxable real property within the City is subject to the levy of ad valorem taxes, without limitation as to rate or amount, for such purpose.

The Bonds are offered when, as and if issued and received by the Underwriters and subject to the final approving opinion of Hawkins, Delafield & Wood, Bond Counsel, New York, New York and certain other conditions.

Certain legal matters will be passed upon for the Underwriters by Rogers & Wells, New York, New York. It is expected that delivery of the Bonds in definitive form will be made on or after August 27, 1986, in New York, New York.

Shearson Lehman Brothers Inc.**The First Boston Corporation****E.F. Hutton & Company Inc.****Marine Midland Bank, N.A.****Dillon, Read & Co. Inc.****PaineWebber
Incorporated****Kidder, Peabody & Co.
Incorporated**

August 1, 1986

* Preliminary, subject to change

EXHIBIT "2"

This Preliminary Official Statement and the information contained herein are subject to completion, amendment or other change without any notice. The securities described herein may not be sold nor may offers to buy be accepted prior to the time the Official Statement is delivered in final form. Under no circumstances shall this Preliminary Official Statement constitute an offer to sell or the solicitation of an offer to buy nor shall there be any sale of these securities in any jurisdiction in which such offer, solicitation or sale would be unlawful prior to registration or qualification under the applicable securities laws of any such jurisdiction.

UNDERWRITING

The Bonds are being purchased for reoffering by the Underwriters set forth on the cover page hereof, for whom Shearson Lehman Brothers Inc. is acting as Managing Underwriter, at an aggregate purchase price for the Bonds of \$ _____ plus accrued interest. The aggregate initial offering price for the Bonds will be \$ _____ plus accrued interest. The Contract of Purchase provides that the Underwriters will purchase all of the Bonds if any Bonds are purchased.

The Underwriters may offer and sell Bonds to certain dealers and others at prices other than the initial offering prices. The offering prices may be changed from time to time by the Underwriters.

ADDITIONAL INFORMATION

The Official Statement is not to be construed as a contract or agreement between the City and the purchasers or holders of any of the Bonds. Any statements made in this Official Statement involving matters of opinion, whether or not expressly so stated, are intended merely as an opinion and not as representations of fact. The information and expressions of opinion herein are subject to change without notice and neither the delivery of this Official Statement nor any sale made hereunder shall, under any circumstances, create any implication that there has been no change in affairs in the City since the date hereof.

Morgan Guaranty Trust Company of New York has served as financial advisor to the City of Buffalo in certain matters with respect to the sale of the Bonds.

Additional information may be obtained upon request from the office of the City Comptroller, Robert E. Whelan, Room 1225 City Hall, Buffalo, New York 14202 (716-855-5255) or from Frances L. Miley, Morgan Guaranty Trust Company, 10th Floor, 15 Broad Street, New York, New York 10015, (212) 483-7272.

The execution of this Official Statement and its delivery have been duly authorized by the Comptroller.

CITY OF BUFFALO

August , 1986

By: _____
ROBERT E. WHELAN, *Comptroller*

Whelan Used City-Tied Bank To Raise Funds

By GEORGE BORRELLI

News Political Reporter

Buffalo Comptroller Robert E. Whelan, who has called for strict enforcement of codes of ethics for public officials, used a bank that does business with the city to help arrange a fund-raiser held for him last month.

Whelan said Tuesday the bank, Morgan Guaranty Trust Co. of New York City, accepted some telephone reservations for his \$200-a-ticket fund-raiser held June 16 in the Lotos Club in Manhattan.

But Whelan insisted there was "no conflict of interest, nothing improper" in the role played by the bank, which serves as financial adviser to Buffalo in the sale of bonds and revenue notes.

However, Richard Planavsky, commissioner of administration and finance in the administration of Mayor Griffin, disagreed.

Planavsky, who unsuccessfully challenged Whelan in the Democratic primary for city comptroller in 1983, said the bank's role in the fund-raiser poses "serious questions of propriety," since the power to hire the bank as financial adviser to the city rests solely with Whelan.

He noted that Whelan recently recommended the creation of the Ethics in Government and Elections Committee of Erie County to enforce a code of ethics for all elected officials in the county.

"If the committee is formed, I think it would be appropriate for the panel to look into this kind of activity," said Planavsky of the Whelan fund-raiser.

Whelan said in a press release issued Monday that the fund-raiser had "brought together 40 to 50 personal friends and business associates" to help celebrate his birthday and "assist his future political activities."

The party netted about \$2,000, according to Whelan, whose political options for 1987 include running for re-election as for Erie County executive.

Invitations for the fund-raiser were sent out by the New York Friends of Robert E. Whelan. The committee listed an RSVP telephone number in the Public Finance Section of Morgan Guaranty Trust Co.

Whelan said the service was provided by the bank as a courtesy and would be reported on his financial disclosure statement as an "in-kind contribution" valued at about \$150.

"The bank had no role of any consequence," asserted Whelan, who said three employees of the bank attended his fund-raiser on a combined contribution of \$500.

Whelan said he has been in the forefront of efforts to reform election campaign laws, especially in the area of expenditures, which he wants curtailed, and in the amount of contributions, which he wants limited to \$1,000 from individuals and \$2,000 from corporations.

The comptroller said he gives no credence to Planavsky's suggestions of a possible conflict, asserting:

"Mr. Planavsky doesn't have the facts and is re-living the defeat he suffered three years ago."



CITY OF BUFFALO

DEPARTMENT OF ADMINISTRATION AND FINANCE

203 CITY HALL

BUFFALO, NEW YORK

RICHARD PLANAVSKY
COMMISSIONER

September 19, 1986

Joan D. Aikens
Chairman
Federal Election Commission
Washington, D.C. 20463

Dear Ms. Aikens:

On July 18, 1986 you received my letter requesting a Federal Election Commission investigation of a possible violation of the Federal Election Campaign Act. Your response of July 24, 1986 outlined the specific requirements which are a prerequisite to Commission action on the matter.

Enclosed is a formal complaint prepared in compliance with the specific requirements outlined in your July 24, 1986 letter. I trust the Commission now can undertake a full investigation of the matter described therein.

Your assistance in this matter is appreciated.

Yours truly,

Richard Planavsky
Richard Planavsky, Commissioner
of Administration and Finance

RP:dmc

Enclosure

To Oge

9-22-86

SEP 22 1986

Rec. 9-22-86
Cikeme

FEDERAL ELECTION COMMISSION
WASHINGTON, D. C.

In the Matter of the Complaint of
RICHARD PLANAVSKY,

Complainant,

-against-

MORGAN GUARANTY TRUST COMPANY
and
ROBERT E. WHELAN,

Respondents.

AFFIDAVIT

SEP 22 10:45:51

STATE OF NEW YORK)
COUNTY OF ERIE : ss:-
CITY OF BUFFALO)

RICHARD PLANAVSKY, being duly sworn, deposes and says:

1. I am the Commissioner of Administration and Finance for the City of Buffalo, New York, and as such, I supervise and manage the City's Division of the Budget, Division of Management Services, Division of Labor Relations, Division of Parking Enforcement, and Division of the Treasury.

2. My business address is Room 203 City Hall, Buffalo, New York, 14202. My business telephone is (716) 855-5710.

3. Upon information and belief, the Respondent, **MORGAN GUARANTY TRUST COMPANY**, is a bank or corporation subject to the provisions of Chapter 14 of Title 2 of the United States Code. Its business address is 15 Broad Street, New York City, New York, 10015.

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4. The Respondent, **ROBERT E. WHELAN**, is the elected Comptroller of the City of Buffalo, New York. His business address is Room 1225 City Hall, Buffalo, New York, 14202.

5. The Respondent, **ROBERT E. WHELAN**, for the last several years, has engaged the services of the other Respondent, **MORGAN GUARANTY TRUST COMPANY**, to act as the financial advisor to the City in matters relating to the sale of bonds and notes.

6. The cost of such services to the City of Buffalo during fiscal year 1985-86 was \$94,791.00.

7. The allegations which I make herein are based upon the following sources of information, copies of which are attached hereto:

- (a) The financial disclosure statement filed by the Respondent, **ROBERT E. WHELAN**, with the New York State Board of Elections (Exhibit "1");
- (b) The preliminary official statement of the City, in connection with the sale of City of Buffalo bonds (Exhibit "2", pp. 1 and 59 only);
- (c) The statements of the Respondent, **ROBERT E. WHELAN**, contained in a news-

paper story in the July 9, 1986 edition
of the Buffalo News (Exhibit "3").

8. It is my complaint to Your Honorable Commission that the Respondents have combined during the early part of 1986 to solicit, to receive and to contribute things of value in New York City for election campaign purposes in apparent violation of Section 441(b) of Title II of the U.S. Code, and of other applicable provisions.

9. It is my request that Your Honorable Commission investigate this matter to determine if such a violation has occurred and to take appropriate action thereon.

Richard Planavsky

RICHARD PLANAVSKY

Subscribed and Sworn to before me
this 19 day of September, 1986.

Genia A. Mazusa

Commissioner of Deeds, Buffalo, N. Y.
My commission expires 12/31/86

JJMcL/sc

STATE OF NEW YORK
BOARD OF ELECTIONS

FINANCIAL DISCLOSURE STATEMENT

IDENTIFICATION

FRIENDS OF BOB WHELAN

Full name of Candidate or Committee — print or type

Ste. 700, 37 Franklin Street

Address — number and street

Buffalo,

New York

14202

City

State

Zip

ID Number — if known

Comptroller, City of Buffalo

Office and District

Democrat

Name of Political Party

☐ Check box
if address has
changed since
last report

TYPE OF REPORT

Check Appropriate Boxes

Date of Election _____

Statement is being filed by:

☐ Candidate☒ Political
Committee☐ Party
Committee☐ Constituted
Committee

Statement reports activities for:

☐ One Candidate☐ More than one CandidateStatement is a Termination Report (you cannot terminate if any funds or debts remain): ☐Statement is an Amendment Report ☐

Amends report previously submitted for period _____

Date

to

Date

REPORTING PERIOD SCHEDULES

Statement period — from 1/15/86
Dateto 7/15/86
Date

Check Appropriate Box

☐ 32 day Pre Primary☐ 32 day Pre General☐ 32 day Pre Special☐ Periodic Jan. 15, 19____☐ 11 day Pre Primary☐ 11 day Pre General☐ 11 day Pre Special☒ Periodic July 15, 1986☐ 27 day Post Primary*☐ 27 day Post General*☐ 27 day Post Special*

*Campaign material must be submitted with 27 day Post-Election statements

VERIFICATION

Must have original signature — sign in pen

ITEMIZED STATEMENT

I state that the information contained in this statement pursuant to the Election Law, is in all respects true and complete to the best of my knowledge, information and belief.

Signature

THOMAS J. CASEY

Treasurer

7/15/86

Title

Date Signed

(Proceed to complete this report on the following pages and schedules.)

IN-LIEU-OF STATEMENT (IF APPLICABLE)

I state that neither the aggregate receipts nor the aggregate expenditures, has exceeded or will exceed one thousand dollars in connection with this campaign.

Signature

Title

Date Signed

(If you qualify to submit this IN-LIEU-OF STATEMENT, you may now STOP, SIGN and SUBMIT it as your report.)

Any false information made in this statement may be punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law. For further information, contact the New York State Board of Elections or your local Board of Elections.

NEW YORK STATE BOARD OF ELECTIONS
99 WASHINGTON AVENUE
ALBANY, NEW YORK 12210

EXHIBIT "1"

35040522334

GENERAL INSTRUCTIONS

This financial statement must be prepared in ink or typed. A statement prepared in pencil may not be accepted for filing. The form is designed for use by either a Candidate or a Committee. Entries on the statement should come from the accounting records maintained by the preparer. Refer to the instructions in the financial disclosure guide booklet, regarding the jurisdiction to which this report must be filed.

The ID Number will be assigned by the State Board of Elections to all candidates and committees filing with the State Board. It should be shown on all reports filed and referred to on all correspondence and inquiries addressed to the State Board of Elections.

This statement must be submitted for each appropriate filing period, and must report the activities of each period itself — separate periods may not be combined into a single report.

All pertinent sections and supporting schedules must be completed — except that an "In-Lieu-Of" statement may be submitted in only the following cases:

- a. A Candidate may submit an "In-Lieu-Of" statement if less than \$1,000 will be expended for the entire campaign.
- b. A Committee may submit an "In-Lieu-Of" statement if less than \$1,000 will be expended for the entire campaign, and the committee is supporting only one candidate, and that Candidate has authorized the Committee to engage in the campaign.

The verification section, whether it be the Itemized Statement or the In-Lieu-Of Statement, must have an original signature.

Contributions: Monetary contributions include all cash, checks, money orders, etc., received, and they must be detailed in *Schedule 2A*.

Non-cash contributions are campaign contributions accepted via property received, certain personal services or facilities provided for campaign use. These must be detailed and valued in the appropriate section of *Schedule 2B*. Line 2B and Line 5B are offset against each other, so that the cash fund balance will not be distorted for purposes of reporting.

Transfers in and Transfers out: For purposes of financial statement reporting, transfers are deemed to occur by passing a sum of money from any campaign fund held by any Committee, to any campaign fund held by any other Committee or other Committee's Candidate. Certain of these interchanges, while considered transfers for reporting purposes, may effect maximum contribution limitations. Refer to the Election Law or to the instructional guide booklet for the legal considerations involved.

The Status of Campaign Costs section must be completed for each report submitted. It accumulates campaign costs for this election campaign, and should not accumulate costs of more than a single election campaign. This campaign is as indicated on the Date of Election line on Page 1, in the section captioned Type of Report.

The Allocation of Campaign Costs section must be completed for each report submitted. (Note that it need not be completed in the instance of supporting only one Candidate, as it is obvious that the entire cost of such campaign is chargeable to that single Candidate.) The campaign costs shall be allocated among the Candidates in accord with any percentage based upon reasonable standards established by the Committee. Inasmuch as this section allocates the accumulating totals of campaign costs throughout the campaign, from Line 31 of the Status of Campaign Costs section, it thereby represents the total financial support given to each Candidate from the beginning of the campaign through the period covered by this report.

SUMMARY OF RECEIPTS AND EXPENDITURES THIS PERIOD

1. Cash balance at beginning of period—must be same as ending balance Line 7 of preceding report		<u>\$29,039.55</u>
2. Receipts during period:		
A. Monetary contributions received (Schedule 2A)	<u>21,490.00</u>	
B. Non-cash contributions—must be same as Line 5B (Schedule 2B)	<u>400.00</u>	
C. Total contributions—Line 2A plus Line 2B	<u>21,890.00</u>	
D. Loan(s) received (Schedule 2D)	<u>0.00</u>	
E. Transfers in (Schedule 2E)	<u>0.00</u>	
F. Refunds of campaign expenditures (Schedule 2F)	<u>0.00</u>	
G. Other receipts (Schedule 2G)	<u>926.84</u>	
3. Add Lines 2C through 2G		<u>22,816.84</u>
4. Add Line 1 plus Line 3		<u>51,856.39</u>
5. Expenditures during period:		
A. Campaign expenses paid (Schedule 5A)	<u>8,763.28</u>	
B. Non-cash contribution adjustment—must be same as Line 2B	<u>400.00</u>	
C. Contributions refunded to contributors (Schedule 5C)	<u>0.00</u>	
D. Loan(s) repayments (Schedule 5D)	<u>0.00</u>	
E. Transfers out (Schedule 5E)	<u>10,567.37</u>	
F. Non-campaign housekeeping expenses—only a Party Committee or a Constituted Committee may have an entry on this line—to report ordinary activities which are not for the express purpose of promoting any Candidate	<u>0.00</u>	
6. Add Line 5A through 5F		<u>19,730.65</u>
7. Cash balance at end of period—Line 4 less Line 6		<u>32,125.74</u>

STATUS OF LOANS

8. Loan(s) balance at beginning of period—must be same as ending balance Line 14 of preceding report		<u>0.00</u>
9. Loan(s) received this period—from Line 2D		<u>0.00</u>
10. Add Line 8 plus Line 9		<u>0.00</u>
11. Loan(s) repayments this period—from Line 5D	<u>0.00</u>	
12. Loan(s) forgiven this period (Schedule 12)	<u>0.00</u>	
13. Add Line 11 plus Line 12		<u>0.00</u>
14. Loan(s) balance at end of period—Line 10 less Line 13		<u>0.00</u>

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STATUS OF UNPAID BILLS

15. **Unpaid bills at beginning of period—must be same as ending total Line 21 of preceding report**
16. **Previous unpaid bills paid this period**
17. **Unpaid bills still unpaid from previous periods—Line 15 less Line 16**
18. **Unpaid bills incurred this period (Schedule 18)**
19. **Add Line 17 plus Line 18**
20. **Unpaid bills forgiven this period (Schedule 20)**
21. **Unpaid bills payable at end of period—Line 19 less Line 20**

STATUS OF CONTRIBUTIONS

22. Contributions this period—from Line 2C
23. Contributions accumulated from previous periods—must be same as Line 24 of preceding report except that this line must be zero if this is the first financial report for this election campaign
24. Total contributions to date—Line 22 plus Line 23

STATUS OF CAMPAIGN COSTS

25. Campaign costs paid this period—from Line 5A _____, plus campaign costs via non-cash contributions this period—from Line 5B _____
26. Campaign payments accumulated for previous periods—must be same as Line 29 of preceding report except that this line must be zero if this is the first financial report for this election campaign
27. Add Line 25 plus Line 26
28. Campaign costs refunded this period—from Line 2F
29. Subtract—Line 27 less Line 28
30. Unpaid bills payable at end of period—from Line 2I
31. Total campaign costs to date—Line 29 plus Line 30

ALLOCATION OF CAMPAIGN COSTS TO CANDIDATE(S)

This section need only be completed by a Committee in support of more than one Candidate

[illegible]

Statement period — from 1/15/86 to 7/15/86
Date Date

NON CASH CONTRIBUTIONS

SCHEDULE 2B

DATE	FULL NAME	MAILING ADDRESS	PURPOSE OF PAYMENT OR DESCRIPTION OF ITEM	AMOUNT PAID OR VALUE OF ITEM
Campaign expenses paid by:				
Property given by:				
Services or facilities provided by:				
6/16/86	Morgan Guaranty Co.	23 Wall Street New York, N.Y. 10015	secretarial services, handling phone calls for fundraiser in N.Y.C. on 6/16/86	150.00
6/16/86	Packard Press	475 Park Avenue South New York, N.Y. 10016	postage and stationery	250.00
(FORGIVENESS OF LOANS OR UNPAID BILLS SHOULD NOT BE SHOWN ON THIS SCHEDULE—SEPARATE SCHEDULES ARE USED FOR SUCH TRANSACTIONS)				TOTAL 400.00

REFUNDS OF CAMPAIGN EXPENDITURES

SCHEDULE 2F

DATE RECEIVED	FULL NAME	MAILING ADDRESS	AMOUNT REFUNDED
TOTAL			0.00

OTHER RECEIPTS

SCHEDULE 2G

DATE RECEIVED	FULL NAME	MAILING ADDRESS	AMOUNT	TYPE OF RECEIPT
2/28/86	Chase Lincoln First	One Lincoln First Square Rochester, New York 14643	175.66	Int. CD Acct. J #67005769 &
3/31/86	Chase Lincoln First	One Lincoln First Square Rochester, New York 14643	151.19	Int. CD Acct. #67005769 Marc
4/30/86	Chase Lincoln First	One Lincoln First Square Rochester, New York 14643	146.30	Int. CD Acct. #67005769 Apri
5/31/86	Chase Lincoln First	One Lincoln First Square Rochester, New York 14643	151.19	Int. CD Acct. #67005769 May
6/30/86	Chase Lincoln First	One Lincoln First Square Rochester, New York 14643	146.30	Int. CD Acct. #67005769 June
1-7/86	Key Bank	17 Court Street Buffalo, New York 14202	156.20	Int. Savings #530-007198
TOTAL			926.84	

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Statement period — from 1/15/86

Date

7/15/86

Date

LOANS RECEIVED

SCHEDULE 2D

DATE RECEIVED	FULL NAME	MAILING ADDRESS	AMOUNT
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SCHEDULE 2D — List any loans received during the reporting period. A copy of the evidence of indebtedness for each loan must be attached to the statement. If the loan was received from a lending institution, there must be included on the evidence of indebtedness the name and address of the obligor of the loan or any other person who endorses, co-signs, guarantees, or otherwise provides security for such loan. The name of this person should also be recorded on the schedule under the name of the lending institution.

(EVIDENCE OF INDEBTEDNESS FOR LOANS LISTED ABOVE MUST BE ATTACHED)			TOTAL 0.00

LOAN REPAYMENTS

SCHEDULE 5D

DATE PAID	FULL NAME	MAILING ADDRESS	AMOUNT	DATE OF LOAN
			TOTAL 0.00	

LOANS FORGIVEN

SCHEDULE 12

DATE FORGIVEN	FULL NAME	MAILING ADDRESS	AMOUNT	DATE OF LOAN
(EVIDENCE FROM LENDERS INDICATING FORGIVENESS MUST BE ATTACHED)			TOTAL 0.00	

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Statement period — from 1/15/86 to 7/15/86
Date Date

MONETARY CONTRIBUTIONS

SCHEDULE 2A

List all monetary contributions which exceed \$50. The date of receipt, full name and mailing address must be given. Do not report receipts from other political committees on this schedule.

Identify contributions from relatives or corporations by placing a check-mark in the appropriate column. For this purpose, a relative is the candidate's child, parent, grandparent, brother, sister, and the spouse of any of those.

It is not required that contributions of less than \$100 be individually listed. These contributors may be grouped together in a single amount and reported on the line provided in the summary section of this schedule. However, if a contributor in this period has contributed an amount, which when added to his previous contributions for this campaign now exceeds \$50, such contributor must now be individually listed.

For each listed contributor, who has made previous contributions to this campaign, show the total previous contributions in the box provided for this purpose.

DATE RECEIVED	Relative	Corp.	FULL NAME	MAILING ADDRESS	AMOUNT	PREVIOUS AMOUNTS -IF ANY
1/17/86			Morgan Companies New York PAC	23 Wall Street New York, New York 10015	200.00	
1/17/86			Stephen Zappia	20 York Street Buffalo, New York 14213	150.00	
2/6/86			Shearson Lehman Peter A. Avalone	World Financial Center New York, New York 10285	200.00	
2/26/86		X	Prudential Bache	4900 Merrick Road Massapequa Park, N.Y. 11762	500.00	
2/26/86			Edward C. Cosgrove	237 Main Street, Ste. 1000 Buffalo, New York 14202	1,000.00	
4/14/86		X	E.F. Hutton CO.	One Battery Park Plaza New York, New York 10004	500.00	
5/1/86			William J. Gillard	52 Brush Hill Rd. Kinnelon, N.J. 07405	1,000.00	
5/2/86			Stephen D. Goddard	333 South Grand, Suite 2400 Los Angeles, Cal. 90071	1,000.00	
5/2/86			Robert F. Goldhammer	74 Arlington Street Winchester, MA. 01890	1,000.00	
5/17/86			Peter D. Goodson	52 Prescott Avenue Bronxville, New York 10706	1,000.00	
4/30/86			A. H. Gordon	10 Gracie Square New York, New York 10028	1,000.00	
4/7/86			David M. McAuliffe	736 Mildred Street Teaneck, N.J. 07666	300.00	
4/16/86			Paul A. Maffeo	2600 Seattle Fris Bldg. Seattle, Washington 98154	300.00	
6/9/86			William P. Maloney	New York, New York	300.00	
4/12/86			Richard C. Makin	New York, New York	300.00	
3/21/86			John A. McColl	5942 Henley Drive San Diego, Cal. 92120	300.00	
3/24/86			Joseph W. Martin, Jr.	2 Hesketh Court Menlo Park, CA. 94025	300.00	
4/1/86			Kenneth C. Markley	1225 Carriage Lane La Grange, Il. 60525	300.00	
5/12/86			Joseph P. Markey	472 Tenth Street Brooklyn, New York 11215	300.00	
Sub-TOTAL					9,950.00	

SUMMARY (To be completed on last page of schedule 2A)

Total unitemized contributions this period

Total itemized contributions this period — all pages

Total contributions received this period

DO NOT COMPLETE UNLESS THIS IS LAST CONTRIBUTION PAGE

Over

25040622370

Statement period — from 1/15/86
Date7/15/86
Date

MONETARY CONTRIBUTIONS

SCHEDULE 2A

DATE RECEIVED	Relative	Corp.	FULL NAME	MAILING ADDRESS	AMOUNT	PREVIOUS AMOUNTS -IF ANY
4/29/86			Peter G. Mastrangelo	New York, New York	300.00	
3/24/86			Carter C. Mathies	1245 S.W. 84th Avenue Portland, Oregon 97225	300.00	
3/24/86			Joseph P. Martorella	81 Lahey Street New Hyde Park, New York 11040	300.00	
3/30/86			Bernard C. Grigsby, II	P.O. Box 645, Wall St. Station New York, New York 10005	700.00	
3/31/86			T. G. Carbonar	12115 San Vicente Blvd. West Los Angeles, CA. 90049	700.00	
6/3/86			Raymond Matison	127 Ralston Avenue South Orange, N.J. 07079	300.00	
6/16/86			Sandra Mokurus Bellush	c/o Chemical Bank, 380 Madison Ave., N.Y., N.Y. 10017	200.00	
6/16/86			George Borris, Frank Soltis & Greg Hickock	c/o Chase PAC, 1 Chase Man- hattan Plaza, N.Y., N.Y. 10081	600.00	
6/16/86			Robert F. Grimmig	New York, New York	200.00	
6/16/86			Maurice Sonnenberg	New York, New York	200.00	
6/16/86			William N. Hudson, Jr.	4985 Sheridan Drive Williamsville, N.Y. 14221	200.00	
6/13/86			Stephen Kohlmann	26 Cedar Avenue Coram, New York 11727	100.00	
6/10/86			Raymond V. DiScala	24 Harbor Hill Drive Lloyd Harbor, N.Y. 11743	100.00	
6/12/86		X	First Albany Corp.	41 State St., P.O. Box 52 Albany, N.Y. 12201	200.00	
6/17/86			Larry R. Hammond	167c New Freedom Berlin, N.J. 08009	200.00	
6/16/86			John K. Dierkes	285 Riverside Drive, 13C New York, New York 10025	200.00	
6/16/86			Amos T. Beason	26 Ox Bow Lane Summit, N.J. 07901	200.00	
6/16/86		X	I.D.B.I. Managers, Inc.	175 Water Street New York, New York 10038	200.00	
6/16/86			Dillon Read Political Action Committee	19 Rector Street, 8th Floor New York, New York 10006	400.00	
6/11/86		X	Rogers & Wells, P.C.	200 Park Avenue New York, New York 10166	400.00	
6/5/86			Robert B. Nolan, Jr.	20 Park Avenue Bronxville, N.Y. 10708	100.00	
6/16/86		X	United Daniels Securities, Inc.	170 Broadway, Suite 1200 New York, New York 10038	400.00	
Sub - TOTAL					16,450.00	

SUMMARY (To be completed on last page of schedule 2A)

Total unitemized contributions this period

Total itemized contributions this period — all pages

Total contributions received this period

DO NOT COMPLETE UNLESS THIS IS LAST CONTRIBUTION PAGE

Statement period — from 1/15/86 to 7/15/86
Date Date

MONETARY CONTRIBUTIONS

DATE RECEIVED	Relative	Corp.	FULL NAME	MAILING ADDRESS	AMOUNT	PREVIOUS AMOUNTS -IF ANY
6/12/86			Committee for Effective Government	Morgan PAC New York, New York	500.00	
6/11/86			Walter T. Kicinski	32 Woodhollow Road Lawrenceville, N.J. 08648	200.00	
6/16/86			John Maus	42 W. 87th Street, No. 48 New York, New York 10024	100.00	
6/14/86			Courtney A. Haff	16 Hudson Street New York, New York 10013	200.00	
6/10/86			Bernard R. Bober	16 Colts Foot Glen Road Saddle River, N.J. 07458	250.00	
6/10/86			Cheryl E. Jones	215 West 91 Street, Apt. 64 New York, New York 10024	200.00	
6/3/86			Chester J. Straub	One Citicorp Center, 153 E. 53rd St., N.Y., N.Y. 10022	200.00	
6/16/86			William Pinakiewicz	249 Kimball Avenue Westfield, N.J. 07090	800.00	
6/16/86			Jeremiah C. Whalen	503 Seabrook Drive Williamsville, N.Y. 14221	200.00	
6/9/86			Burt R. Ehrlich	80 Pine Street New York, New York 10005	250.00	
6/17/86			Gedale Bob Horowitz	One New York Plaza New York, New York 10004	400.00	
6/16/86			Nelson D. Civello	140 Broadway New York, New York	200.00	
6/18/86			Ronald E. Curvin	140 Broadway New York, New York	200.00	
6/9/86			John H. Dyson	c/o Wakefield National, Inc. 2 Park Ave., N.Y., N.Y. 10016	500.00	
Miscellaneous contributions					140.00	
6/11/86			J. Chester Johnson	32 Woodhollow Road Lawrenceville, N.J. 08648	200.00	
6/23/86		X	Brown & Wood, P.C.	One World Trade Center New York, New York 10048	500.00	
TOTAL					21,490.00	

SUMMARY (To be completed on last page of schedule 2A)

Total unitemized contributions this period

140.00

Total itemized contributions this period — all pages

21,350.00

Total contributions received this period

21,490.00

DO NOT COMPLETE UNLESS THIS IS LAST CONTRIBUTION PAGE

33040622372

Statement period — from 1/15/86 to 7/15/86
Date Date

CAMPAIGN EXPENSES PAID

SCHEDULE 5A

DATE PAID	FULL NAME	MAILING ADDRESS	AMOUNT	PURPOSE OF DISBURSEMENT
1/22/86	Amherst Democratic Committee	333 Dick Road Depew, New York 14043	10.00	raffle tickets
1/24/86	Accurate Campaign Lists	3997 Genesee Street Cheektowaga, New York 14225	250.00	contribution lists
1/24/86	Wiechec's Social Club	1748 Clinton Street Buffalo, New York	65.00	* pg. ad program
1/24/86	Sunrise Press	574 Fillmore Avenue Buffalo, New York 14212	211.60	printing of tickets
1/27/86	Mercy Hospital Foundation	565 Abbott Road Buffalo, New York 14220	100.00	2 tickets
1/27/86	The Cane Fund	Grand Island, New York	500.00	donation
1/30/86	Blackthorns	245 Abbott Road Buffalo, New York 14220	15.00	1986 annual dues
1/30/86	Friends of Sheriff Tom F. Higgins	56 Mumford Avenue Buffalo, New York 14220	50.00	advertising
1/30/86	Cynthia A. Wojtanik	76 Wood Street Lackawanna, New York 14218	75.00	secretarial services, Jan.
1/31/86	New Democratic Coalition	New York, New York	100.00	1 ticket
2/4/86	U.S. Postmaster	Niagara Square Station Buffalo, New York 14202	44.00	2 rolls of stamps
2/4/86	N.Y. Telephone Co.	1600 Rand Building Buffalo, New York 14203	91.15	car phone 1/25 - 2/24
2/6/86	Robert E. Whelan	1111 Amherst Street Buffalo, New York 14216	265.00	Jan. out-of-pocket exp.
2/6/86	Kathy Gregorie	156 Weyand Street Buffalo, New York 14210	37.80	reimbursement scrapbook
2/10/86	Amherst Gaelic League	5707 Main Street Williamsville, New York 14221	120.00	10 tickets
2/14/86	Bishop Timon High School	601 McKinley Parkway Buffalo, New York 14220	25.00	* page - advertising
2/21/86	Easter Seal Society	974 Kenmore Avenue Buffalo, New York 14216	50.00	5 tickets
2/21/86	U.S. Postmaster	Niagara Square Station Buffalo, New York 14202	66.00	3 rolls stamps
2/26/86	Larry Goldberg	Buffalo, New York	65.00	reimbursement St. Pat cards
2/28/86	Cynthia A. Wojtanik	76 Wood Street Lackawanna, New York 14218	75.00	secretarial services - Feb.
2/28/86	Benefit for Tom & Jane O'Malley	245 Abbott Road Buffalo, New York 14220	60.00	4 tickets
2/28/86	The Hyatt Regency	2 Fountain Plaza Buffalo, New York 14202	270.60	luncheon meeting 2/25
3/4/86	Forum Restaurant	Buffalo, New York	21.74	breakfast meeting 3/4
3/5/86	Robert E. Whelan	1111 Amherst Street Buffalo, New York 14216	215.00	out-of-pocket exp. - Feb.
3/11/86	Internal Revenue Service	Lowell Street Andover, Mass.	30.00	payment of 1120 POL tax
3/12/86	Vilardo Printing	326 Connecticut Street Buffalo, New York 14213	653.40	letterhead & stationery
Sub - TOTAL			3,466.30	

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Statement period — from 1/15/86

to 7/15/86

Date

Date

CAMPAIGN EXPENSES PAID

SCHEDULE 5A

DATE PAID	FULL NAME	MAILING ADDRESS	AMOUNT	PURPOSE OF DISBURSEMENT
DO NOT report Transfers Out, use Schedule 5E				
3/24/86	Buffalo Telephone Co.	1600 Rand Building Buffalo, New York 14203	85.48	car phone 2 mos.
3/31/86	Erie County Committee Conservative Party N.Y.	263 Statler Building Buffalo, New York 14202	80.00	2 tickets
3/31/86	Cynthia A. Woitanik	76 Wood Street Lackawanna, New York 14218	75.00	secretarial services - Ma
3/31/86	Erie County Committee - Conservative Party N.Y.	263 Statler Building Buffalo, New York 14202	45.00	1/4 pg. ad
3/31/86	Zone 16 Democratic Comm.	232 E. Amherst Street Buffalo, New York 14214	5.00	5 raffle tickets
4/7/86	Robert E. Whelan	1111 Amherst Street Buffalo, New York 14216	205.00	Mar. out of pocket expen.
4/7/86	University District Democratic Club	163 Marth Avenue Buffalo, New York 14215	12.00	2 tickets
4/7/86	University District Democratic Club	163 Marth Avenue Buffalo, New York 14215	15.00	1/4 pg. ad
4/8/86	Committee to Re-Elect Joanne I. Skorka	546 Richmond Avenue Buffalo, New York 14222	20.00	1 ticket
4/8/86	Trocaire College	110 Red Jacket Parkway Buffalo, New York 14220	35.00	1 ticket
4/14/86	Frontier Democratic Club	210 Voorhees Avenue Buffalo, New York 14214	25.00	1/4 page ad
4/14/86	Community Action Organi- zation of Erie Co.	70 Harvard Place Buffalo, New York 14209	18.50	1/8 pg. ad
4/14/86	Buffalo-Dortmund Sister City Committee	91 Pine Street East Aurora, N.Y. 14052	15.00	3 tickets
4/15/86	U.S. Postmaster	Niagara Square Buffalo, New York 14202	88.00	4 rolls of stamps
4/18/86	Greater Buffalo Demo- cratic Women's Club	9040 Main Street Clarence, New York 14031	24.00	2 tickets
4/18/86	Frontier Democratic Club	24 Ross Avenue Buffalo, New York 14207	40.00	2 tickets
4/23/86	North Buffalo Jaycees	P.O. Box 252 Buffalo, New York 14216	15.00	1/4 pg. ad
4/23/86	Hillery Memorial Scholarship Foundation	601 McKinley Parkway Buffalo, New York 14220	10.00	honorary patron ad
4/30/86	W.N.Y. Chapter of Arthritis Foundation	Niagara Falls Blvd. Tonawanda, New York 14150	250.00	donation
5/1/86	Ronald McDonald House of Buffalo	780 West Ferry Street Buffalo, New York 14222	50.00	special patron ad
5/1/86	Mercy Hospital Men's Sustaining Society	565 Abbott Road Buffalo, New York 14220	20.00	membership due & 3 raffle tick
5/6/86	Robert E. Whelan	1111 Amherst Street Buffalo, New York 14216	270.00	out-of-pocket expenses-April
Sub -TOTAL			4,869.28	

SUMMARY (To be completed on last page of schedule 5A)

Total unitemized expenses this period

Total itemized expenses this period — all pages

Total campaign expenses expended this period

DO NOT COMPLETE UNLESS THIS IS LAST CAMPAIGN EXPENSE PAGE

Statement period — from 1/15/86 to7/15/86
Date Date

CAMPAIGN EXPENSES PAID

SCHEDULE 5A

DATE PAID	FULL NAME	MAILING ADDRESS	AMOUNT	PURPOSE OF DISBURSEMENT
DO NOT report Transfers Out, use Schedule 5E				
5/7/86	Erie County Democratic Town Chairmen's Assoc.	87 Clark Street Orchard Park, N.Y. 14127	20.00	1 ticket
5/7/86	W.N.Y. Chapter of Arthritis Foundation	Niagara Falls Blvd. Tonawanda, New York 14150	80.00	1 ticket
5/19/86	Puerto-Rican American Community Association	110 Hartwell Road Buffalo, New York 14216	25.00	4 pg. ad
5/20/86	Preservation Coalition of Erie County	20 Angle Street Buffalo, New York 14214	15.00	membership dues
5/22/86	Lotus Club	5 East 66th Street New York, New York 10021	500.00	deposit for room-fundraise in N.Y.C. on 6/16/86
5/28/86	Cynthia A. Wojtanik	76 Wood Street Lackawanna, New York 14218	150.00	secretarial services, Apr
5/28/86	Inner City Concerned Citizens	56 North Parade Avenue Buffalo, New York 14211	25.00	1 ticket
5/28/86	Frontier Democratic Club	24 Ross Avenue Buffalo, New York 14207	15.00	membership dues
5/29/86	Robert E. Whelan	1111 Amherst Street Buffalo, New York 14216	370.00	out-of-pocket expenses, May
5/30/86	Women's Division of Erie Co. Democratic Committee	220 Delaware Avenue, #425 Buffalo, New York 14202	20.00	4 pg. ad
5/30/86	Citizens for Hoyt	Buffalo, New York	30.00	1 ticket
6/5/86	Committee to Re-Elect Mazurek	1202 Broadway Buffalo, New York 14212	40.00	2 tickets
6/5/86	Erie ARC	Buffalo, New York	25.00	contribution Walkathon 6/7
6/6/86	U.S. Air	Greater Bflo. Int. Airport Cheektowaga, N.Y. 14225	672.00	Airfare for committee for fundraiser in N.Y.C. 6/16
6/9/86	U.S. Postmaster	Niagara Square Station Buffalo, New York 14202	44.00	2 rolls stamps
6/9/86	Nicholas Sargent	15 Court Street Buffalo, New York 14202	49.00	reimbursement c expenses for N. fundraiser 6/16
6/17/86	Robert E. Whelan	1111 Amherst Street Buffalo, New York 14216	620.00	reimbursement for hotel, meal transportation N.Y.C. fundrais
6/17/86	Lotus Club	5 East 66th Street New York, New York 10021	935.00	balance due 6/ N.Y.C. fundrais
Sub-TOTAL			8,504.28	

SUMMARY (To be completed on last page of schedule 5A)

Total unitemized expenses this period _____

Total itemized expenses this period — all pages _____

Total campaign expenses expended this period _____

DO NOT COMPLETE UNLESS THIS IS LAST CAMPAIGN EXPENSE PAGE

95040522376

BOARD OF ELECTIONS
ERIE COUNTY, N.Y.

JUN 4 4 55 PM '86

FRIENDS OF BOB WHELAN
c/o 700 Cathedral Park Tower
37 Franklin Street
Buffalo, New York 14202

May 30, 1986

Democratic Headquarters
Erie County Board of Elections
134 West Eagle Street
Buffalo, New York 14202

RE: FRIENDS OF BOB WHELAN

Dear Sirs:

Per your instructions in Paragraph "A" of Campaign Finance Guide for Candidates and Political Committees, please be advised that five contributions in the amount of \$1,000 each have been received by our committee, which are as follows:

1) William J. or Dorothy D. Gillard	\$1,000.00
2) Stephen D. and Deborah G. Goddard	1,000.00
3) Robert F. Goldhammer	1,000.00
4) Peter D. and Terry D. Goodson	1,000.00
5) A. H. Gordon	1,000.00

I have enclosed photocopies of those checks.

If any additional information is requested, please do not hesitate to contact me.

Very truly yours,

FRIENDS OF BOB WHELAN

Cynthia A. Wojtanik

BY

Cynthia A. Wojtanik

CW
Enclosure

8 7 3 2 2 0 4 0 5 9

95040322379

No. 3657

A. H. GORDON
10 Grace Square
New York, NY 10028

April 30 1986

PAY TO THE ORDER OF Friends of Bob Whelan \$1,000.00

One Thousand and no/100

DOLLAR

BANK OF NEW YORK

60 WALL STREET, NEW YORK, N.Y. 10005

Adm

⑆036576⑆ ⑆021000018⑆

⑆24 8606⑆

WILLIAM J. OR DOROTHY D. GILLARD
52 BRUSH HILL RD. PH. 201-468-2488
KINNELON, NJ 07405

2207

Pay to the Order of

Friends of Bob Whelan

Date 5/1 1986

\$1,000-

Dolla

U.S. Trust

UNITED STATES TRUST CO.
OF NEW YORK
46 Wall Street
New York, N.Y. 10005



Memo

William J. Gillard

⑆021001318⑆

66 4065 3⑆ 2207

TRUST
Premium Account

STEPHEN D. GODDARD
DEBORAH GODDARD
333 SOUTH GRAND, SUITE 2400
LOS ANGELES, CA 90071

316

May 2 1986 25-30/440

PAY TO THE ORDER OF

Friends of Bob Whelan

\$1000 ⁰⁰/₁₀₀

One Thousand Dollars ⁰⁰/₁₀₀

DOLLAR

BANK ONE.

BANK ONE OF COLUMBUS, NA
Columbus, Ohio 43271

MEMO

Stephen D. Goddard

⑆044000804⑆ 4229052034⑆ 0316

ROBERT F. GOLDHAMMER
74 Arlington Street
Winchester, MA 01890

2666

PAY TO THE ORDER OF

Frank & Bob Williams 11-1-76 1976 \$100.00
One hundred and 00/100 DOLLAR

① BANK OF NEW ENGLAND, NA
BOSTON, MASSACHUSETTS

Memo:

R. F. Goldhammer

⑆011000138⑆ 1168 3828 2666

PETER D. GOODSON
TERRY D. GOODSON
52 PRESCOTT AVE.
BRONXVILLE, NY 10708

5553

Pay to the
Order of

Friends of Cat Hospital May 17 1976 \$100.00
One hundred and 00/100 DOLLAR

U.S. Trust

UNITED STATES TRUST CO.
OF NEW YORK
48 Wall Street
New York, N.Y. 10005

Memo

Peter Goodson

⑆02100138⑆ 61 0325 5553

86040522380

PRELIMINARY OFFICIAL STATEMENT DATED AUGUST 5, 1986

NEW ISSUES

Ratings: See "Ratings" herein

In the opinion of Bond Counsel, interest on the Bonds is exempt, under existing statutes, from federal income taxes and, under existing statutes, interest on the Bonds is exempt from personal income taxes of New York State and its political subdivisions, including The City of New York. For information regarding certain legislation which may affect the exemption of interest on the Bonds from federal income taxation, see "Pending Federal Tax Legislation", herein.

\$55,424,000***City of Buffalo, New York**

Dated: August 1, 1986

Due: February 1, as shown below

**\$40,684,000 General Improvement Serial Bonds—1986-D and
\$2,390,000 General Improvement Water Supply Serial Bonds—1986-F**

Series D Amount	Series F Amount	Maturity	Interest Rate	Price	Series D Amount	Maturity	Interest Rate	Price
\$ 300,000		1987	%	%	\$1,160,000	2003		
1,714,000	\$160,000	1988			1,160,000	2004		
1,710,000	160,000	1989			1,185,000	2005		
1,725,000	160,000	1990			1,205,000	2006		
1,900,000	160,000	1991			705,000	2007		
1,860,000	135,000	1992			705,000	2008		
1,920,000	135,000	1993			705,000	2009		
1,965,000	135,000	1994			730,000	2010		
2,010,000	155,000	1995			750,000	2011		
2,115,000	155,000	1996			750,000	2012		
2,065,000	155,000	1997			750,000	2013		
2,100,000	165,000	1998			775,000	2014		
2,115,000	175,000	1999			775,000	2015		
2,070,000	180,000	2000			775,000	2016		
1,680,000	180,000	2001						
1,305,000	180,000	2002						

\$12,350,000 School Serial Bonds—1986-E

Amount	Maturity	Interest Rate	Price	Amount	Maturity	Interest Rate	Price
\$ 535,000	1988	%	%	\$ 600,000	1998	%	%
535,000	1989			600,000	1999		
535,000	1990			600,000	2000		
535,000	1991			600,000	2001		
580,000	1992			600,000	2002		
590,000	1993			680,000	2003		
660,000	1994			680,000	2004		
660,000	1995			680,000	2005		
660,000	1996			680,000	2006		
660,000	1997			680,000	2007		

Accrued Interest to be added

The Bonds will be issued in fully registered form in denominations of \$5,000 or any integral multiple thereof for any single maturity, except that one bond for the 1988 maturity of the General Improvement Serial Bonds-1986-D may be issued in a denomination which is or includes an amount less than the authorized multiple. Principal, when due, will be payable at the principal corporate trust office of The Chase Manhattan Bank, N.A., New York, New York, the Fiscal Agent for the Bonds. Interest on the Bonds will be payable on February 1, 1987, August 1, 1987 and semi-annually thereafter on February 1 and August 1 in each year to maturity. Such interest is payable by check mailed on each such interest payment date to the registered owner at his address as shown on the registration books of the Fiscal Agent as of the fifteenth day of the month next preceding each such interest payment date. The Bonds maturing in the years 1987 through 1996 are not subject to prior redemption. The Bonds maturing in 1997 and thereafter are redeemable at the option of the City on February 1, 1996, and thereafter on any interest payment date at declining redemption prices not exceeding 101%, as described herein.

The Bonds will constitute general obligations of the City and will contain a pledge of its faith and credit for the payment of the principal of and interest on the Bonds and all the taxable real property within the City is subject to the levy of ad valorem taxes, without limitation as to rate or amount, for such purpose.

The Bonds are offered when, as and if issued and received by the Underwriters and subject to the final approving opinion of Hawkins, Delafield & Wood, Bond Counsel, New York, New York and certain other conditions.

Certain legal matters will be passed upon for the Underwriters by Rogers & Wells, New York, New York. It is expected that delivery of the Bonds in definitive form will be made on or after August 27, 1986, in New York, New York.

Shearson Lehman Brothers Inc.**The First Boston Corporation****E.F. Hutton & Company Inc.****Marine Midland Bank, N.A.****Dillon, Read & Co. Inc.****PaineWebber
Incorporated****Kidder, Peabody & Co.
Incorporated**

August 1, 1986

* Preliminary, subject to change

EXHIBIT "2"

This Preliminary Official Statement and the information contained herein are subject to completion, amendment or other change without any notice. The securities described herein may not be sold nor may offers to buy be accepted prior to the time the Official Statement is delivered in final form. Under no circumstances shall this Preliminary Official Statement constitute an offer to sell or the solicitation of an offer to buy nor shall there be any sale of these securities in any jurisdiction in which such offer, solicitation or sale would be unlawful prior to registration or qualification under the applicable securities laws of any such jurisdiction.

UNDERWRITING

The Bonds are being purchased for reoffering by the Underwriters set forth on the cover page hereof, for whom Shearson Lehman Brothers Inc. is acting as Managing Underwriter, at an aggregate purchase price for the Bonds of \$ _____ plus accrued interest. The aggregate initial offering price for the Bonds will be \$ _____ plus accrued interest. The Contract of Purchase provides that the Underwriters will purchase all of the Bonds if any Bonds are purchased.

The Underwriters may offer and sell Bonds to certain dealers and others at prices other than the initial offering prices. The offering prices may be changed from time to time by the Underwriters.

ADDITIONAL INFORMATION

The Official Statement is not to be construed as a contract or agreement between the City and the purchasers or holders of any of the Bonds. Any statements made in this Official Statement involving matters of opinion, whether or not expressly so stated, are intended merely as an opinion and not as representations of fact. The information and expressions of opinion herein are subject to change without notice and neither the delivery of this Official Statement nor any sale made hereunder shall, under any circumstances, create any implication that there has been no change in affairs in the City since the date hereof.

Morgan Guaranty Trust Company of New York has served as financial advisor to the City of Buffalo in certain matters with respect to the sale of the Bonds.

Additional information may be obtained upon request from the office of the City Comptroller, Robert E. Whelan, Room 1225 City Hall, Buffalo, New York 14202 (716-855-5255) or from Frances L. Miley, Morgan Guaranty Trust Company, 10th Floor, 15 Broad Street, New York, New York 10015, (212) 483-7272.

The execution of this Official Statement and its delivery have been duly authorized by the Comptroller.

CITY OF BUFFALO

August , 1986

By: _____
ROBERT E. WHELAN, *Comptroller*

Whelan Used City-Tied Bank To Raise Funds

By GEORGE BORRELLI

New Political Reporter

Buffalo Comptroller Robert E. Whelan, who has called for strict enforcement of codes of ethics for public officials, used a bank that does business with the city to help arrange a fund-raiser held for him last month.

Whelan said Tuesday the bank, Morgan Guaranty Trust Co. of New York City, accepted some telephone reservations for his \$200-a-ticket fund-raiser held June 16 in the Lotos Club in Manhattan.

But Whelan insisted there was "no conflict of interest, nothing improper" in the role played by the bank, which serves as financial adviser to Buffalo in the sale of bonds and revenue notes.

However, Richard Planavsky, commissioner of administration and finance in the administration of Mayor Griffin, disagreed.

Planavsky, who unsuccessfully challenged Whelan in the Democratic primary for city comptroller in 1983, said the bank's role in the fund-raiser poses "serious questions of propriety," since the power to hire the bank as financial adviser to the city rests solely with Whelan.

He noted that Whelan recently recommended the creation of the Ethics in Government and Elections Committee of Erie County to enforce a code of ethics for all elected officials in the county.

"If the committee is formed, I think it would be appropriate for the panel to look into this kind of activity," said Planavsky of the Whelan fund-raiser.

Whelan said in a press release issued Monday that the fund-raiser had "brought together 40 to 50 personal friends and business associates" to help celebrate his birthday and "assist his future political activities."

The party netted about \$2,000, according to Whelan, whose political options for 1987 include running for re-election or for Erie County executive.

Invitations for the fund-raiser were sent out by the New York Friends of Robert E. Whelan. The committee listed an RSVP telephone number in the Public Finance Section of Morgan Guaranty Trust Co.

Whelan said the service was provided by the bank as a courtesy and would be reported on his financial disclosure statement as an "in-kind contribution" valued at about \$150.

"The bank had no role of any consequence," asserted Whelan, who said three employees of the bank attended his fund-raiser on a combined contribution of \$300.

Whelan said he has been in the forefront of efforts to reform election campaign laws, especially in the area of expenditures, which he wants curtailed, and in the amount of contributions, which he wants limited to \$1,000 from individuals and \$2,000 from corporations.

The comptroller said he gives no credence to Planavsky's suggestions of a possible conflict, asserting:

"Mr. Planavsky doesn't have the facts and is re-living the defeat he suffered three years ago."

GCC 1585



CITY OF BUFFALO
DEPARTMENT OF ADMINISTRATION AND FINANCE

203 CITY HALL

BUFFALO, NEW YORK

RICHARD PLANAVSKY
COMMISSIONER

September 19, 1986

Joan D. Aikens
Chairman
Federal Election Commission
Washington, D.C. 20463

Dear Ms. Aikens:

On July 18, 1986 you received my letter requesting a Federal Election Commission investigation of a possible violation of the Federal Election Campaign Act. Your response of July 24, 1986 outlined the specific requirements which are a prerequisite to Commission action on the matter.

Enclosed is a formal complaint prepared in compliance with the specific requirements outlined in your July 24, 1986 letter. I trust the Commission now can undertake a full investigation of the matter described therein.

Your assistance in this matter is appreciated.

Yours truly,

Richard Planavsky, Commissioner
of Administration and Finance

RP:dmc

Enclosure

03 SEP 22 8 3: 02

FEDERAL ELECTION COMMISSION
WASHINGTON, D. C.

In the Matter of the Complaint of
RICHARD PLANAVSKY,

Complainant,

-against-

MORGAN GUARANTY TRUST COMPANY
and
ROBERT E. WHELAN,

Respondents.

AFFIDAVIT

6 SEP 22 P 4: 51

RECEIVED
GENERAL INVESTIGATIVE
DIVISION
SEP 22 1964

STATE OF NEW YORK)
COUNTY OF ERIE : ss:-
CITY OF BUFFALO)

RICHARD PLANAVSKY, being duly sworn, deposes and says:

1. I am the Commissioner of Administration and Finance for the City of Buffalo, New York, and as such, I supervise and manage the City's Division of the Budget, Division of Management Services, Division of Labor Relations, Division of Parking Enforcement, and Division of the Treasury.

2. My business address is Room 203 City Hall, Buffalo, New York, 14202. My business telephone is (716) 855-5710.

3. Upon information and belief, the Respondent, **MORGAN GUARANTY TRUST COMPANY**, is a bank or corporation subject to the provisions of Chapter 14 of Title 2 of the United States Code. Its business address is 15 Broad Street, New York City, New York, 10015.

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4. The Respondent, **ROBERT E. WHELAN**, is the elected Comptroller of the City of Buffalo, New York. His business address is Room 1225 City Hall, Buffalo, New York, 14202.

5. The Respondent, **ROBERT E. WHELAN**, for the last several years, has engaged the services of the other Respondent, **MORGAN GUARANTY TRUST COMPANY**, to act as the financial advisor to the City in matters relating to the sale of bonds and notes.

6. The cost of such services to the City of Buffalo during fiscal year 1985-86 was \$94,791.00.

7. The allegations which I make herein are based upon the following sources of information, copies of which are attached hereto:

- (a) The financial disclosure statement filed by the Respondent, **ROBERT E. WHELAN**, with the New York State Board of Elections (Exhibit "1");
- (b) The preliminary official statement of the City, in connection with the sale of City of Buffalo bonds (Exhibit "2", pp. 1 and 59 only);
- (c) The statements of the Respondent, **ROBERT E. WHELAN**, contained in a news-

paper story in the July 9, 1986 edition
of the Buffalo News (Exhibit "3").

8. It is my complaint to Your Honorable Commission that the Respondents have combined during the early part of 1986 to solicit, to receive and to contribute things of value in New York City for election campaign purposes in apparent violation of Section 441(b) of Title II of the U.S. Code, and of other applicable provisions.

9. It is my request that Your Honorable Commission investigate this matter to determine if such a violation has occurred and to take appropriate action thereon.

Richard Planavsky

RICHARD PLANAVSKY

Subscribed and Sworn to before me

this 19 day of September, 1986.

Gina A. Mazuca

Commissioner of Deeds, Buffalo, N. Y.
My commission expires 12/31/86

JJMcL/sc

STATE OF NEW YORK
BOARD OF ELECTIONS

FINANCIAL DISCLOSURE STATEMENT

IDENTIFICATION

FRIENDS OF BOB WHITMAN

Full name of Candidate or Committee — print or type

Ste. 700, 37 Franklin Street

Address — number and street

Buffalo,

New York

14202

City

State

Zip

ID Number — if known

Comptroller, City of Buffalo

Office and District

Democrat

Name of Political Party

TYPE OF REPORT

Check Appropriate Boxes

Date of Election _____

Statement is being filed by:

☐ Candidate☒ Political
Committee☐ Party
Committee☐ Constituted
Committee

Statement reports activities for:

☐ One Candidate☐ More than one CandidateStatement is a Termination Report (you cannot terminate if any funds or debts remain): ☐Statement is an Amendment Report ☐

Amends report previously submitted for period _____

Date

to

Date

REPORTING PERIOD SCHEDULES

Statement period — from 1/15/86 to 7/15/86
Date Date

Check Appropriate Box

☐ 32 day Pre Primary☐ 32 day Pre General☐ 32 day Pre Special☐ Periodic Jan. 15, 19____☐ 11 day Pre Primary☐ 11 day Pre General☐ 11 day Pre Special☒ Periodic July 15, 1986☐ 27 day Post Primary*☐ 27 day Post General*☐ 27 day Post Special*

*Campaign material must be submitted with 27 day Post-Election statements

VERIFICATION

Must have original signature — sign in pen

ITEMIZED STATEMENT

I state that the information contained in this statement pursuant to the Election Law, is in all respects true and complete to the best of my knowledge, information and belief.

Signature

THOMAS J. CASEY

Treasurer

7/15/86

Title

Date Signed

(Proceed to complete this report on the following pages and schedules.)

IN-LIEU-OF STATEMENT (IF APPLICABLE)

I state that neither the aggregate receipts nor the aggregate expenditures, has exceeded or will exceed one thousand dollars in connection with this campaign.

Signature

Title

Date Signed

(If you qualify to submit this IN-LIEU-OF STATEMENT, you may now STOP, SIGN and SUBMIT it as your report.)

Any false information made in this statement may be punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law. For further information, contact the New York State Board of Elections or your local Board of Elections.

NEW YORK STATE BOARD OF ELECTIONS
99 WASHINGTON AVENUE
ALBANY, NEW YORK 12210

EXHIBIT "1"

95040522398

GENERAL INSTRUCTIONS

This financial statement must be prepared in ink or typed. A statement prepared in pencil may not be accepted for filing. The form is designed for use by either a Candidate or a Committee. Entries on the statement should come from the accounting records maintained by the preparer. Refer to the instructions in the financial disclosure guide booklet, regarding the jurisdiction to which this report must be filed.

The ID Number will be assigned by the State Board of Elections to all candidates and committees filing with the State Board. It should be shown on all reports filed and referred to on all correspondence and inquiries addressed to the State Board of Elections.

This statement must be submitted for each appropriate filing period, and must report the activities of each period itself — separate periods may not be combined into a single report.

All pertinent sections and supporting schedules must be completed — except that an "In-Lieu-Of" statement may be submitted in only the following cases:

- a. A Candidate may submit an "In-Lieu-Of" statement if less than \$1,000 will be expended for the entire campaign.
- b. A Committee may submit an "In-Lieu-Of" statement if less than \$1,000 will be expended for the entire campaign, and the committee is supporting only one candidate, and that Candidate has authorized the Committee to engage in the campaign.

The verification section, whether it be the Itemized Statement or the In-Lieu-Of Statement, must have an original signature.

Contributions: Monetary contributions include all cash, checks, money orders, etc., received, and they must be detailed in *Schedule 2A*.

Non-cash contributions are campaign contributions accepted via property received, certain personal services or facilities provided for campaign use. These must be detailed and valued in the appropriate section of *Schedule 2B*. Line 2B and Line 5B are offset against each other, so that the cash fund balance will not be distorted for purposes of reporting.

Transfers in and Transfers out: For purposes of financial statement reporting, transfers are deemed to occur by passing a sum of money from any campaign fund held by any Committee, to any campaign fund held by any other Committee or other Committee's Candidate. Certain of these interchanges, while considered transfers for reporting purposes, may effect maximum contribution limitations. Refer to the Election Law or to the instructional guide booklet for the legal considerations involved.

The Status of Campaign Costs section must be completed for each report submitted. It accumulates campaign costs for this election campaign, and should not accumulate costs of more than a **single election campaign**. This campaign is as indicated on the Date of Election line on Page 1, in the section captioned Type of Report.

The Allocation of Campaign Costs section must be completed for each report submitted. (Note that it need not be completed in the instance of supporting only one Candidate, as it is obvious that the entire cost of such campaign is chargeable to that single Candidate.) The campaign costs shall be allocated among the Candidates in accord with any percentage based upon reasonable standards established by the Committee. Inasmuch as this section allocates the accumulating totals of campaign costs throughout the campaign, from Line 31 of the Status of Campaign Costs section, it thereby represents the total financial support given to each Candidate from the **beginning of the campaign** through the period covered by this report.

SUMMARY OF RECEIPTS AND EXPENDITURES THIS PERIOD

1. Cash balance at beginning of period—must be same as ending balance Line 7 of preceding report		<u>\$29,039.55</u>
2. Receipts during period:		
A. Monetary contributions received (Schedule 2A)	<u>21,490.00</u>	
B. Non-cash contributions—must be same as Line 5B (Schedule 2B)	<u>400.00</u>	
C. Total contributions—Line 2A plus Line 2B	<u>21,890.00</u>	
D. Loan(s) received (Schedule 2D)	<u>0.00</u>	
E. Transfers in (Schedule 2E)	<u>0.00</u>	
F. Refunds of campaign expenditures (Schedule 2F)	<u>0.00</u>	
G. Other receipts (Schedule 2G)	<u>926.84</u>	
3. Add Lines 2C through 2G		<u>22,816.84</u>
4. Add Line 1 plus Line 3		<u>51,856.39</u>
5. Expenditures during period:		
A. Campaign expenses paid (Schedule 5A)	<u>8,763.28</u>	
B. Non-cash contribution adjustment—must be same as Line 2B	<u>400.00</u>	
C. Contributions refunded to contributors (Schedule 5C)	<u>0.00</u>	
D. Loan(s) repayments (Schedule 5D)	<u>0.00</u>	
E. Transfers out (Schedule 5E)	<u>10,567.37</u>	
F. Non-campaign housekeeping expenses—only a Party Committee or a Constituted Committee may have an entry on this line—to report ordinary activities which are not for the express purpose of promoting any Candidate	<u>0.00</u>	
6. Add Line 5A through 5F		<u>19,730.65</u>
7. Cash balance at end of period—Line 4 less Line 6		<u>32,125.74</u>

STATUS OF LOANS

8. Loan(s) balance at beginning of period—must be same as ending balance Line 14 of preceding report		<u>0.00</u>
9. Loan(s) received this period—from Line 2D		<u>0.00</u>
10. Add Line 8 plus Line 9		<u>0.00</u>
11. Loan(s) repayments this period—from Line 5D	<u>0.00</u>	
12. Loan(s) forgiven this period (Schedule 12)	<u>0.00</u>	
13. Add Line 11 plus Line 12		<u>0.00</u>
14. Loan(s) balance at end of period—Line 10 less Line 13		<u>0.00</u>

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STATUS OF UNPAID BILLS

15. **Unpaid bills at beginning of period**—must be same as ending total Line 21 of preceding report
16. Previous unpaid bills paid this period
17. Unpaid bills still unpaid from previous periods—Line 15 less Line 16
18. Unpaid bills incurred this period (*Schedule 18*)
19. **Add Line 17 plus Line 18**
20. Unpaid bills forgiven this period (*Schedule 20*)
21. **Unpaid bills payable at end of period**—Line 19 less Line 20

STATUS OF CONTRIBUTIONS

22. Contributions this period—from Line 2C
23. Contributions accumulated from previous periods—must be same as Line 24 of preceding report except that this line must be zero if this is the first financial report for this election campaign
24. Total contributions to date—Line 22 plus Line 23

STATUS OF CAMPAIGN COSTS

25. Campaign costs paid this period—from Line 5A _____, plus campaign costs via non-cash contributions this period—from Line 5B _____
26. Campaign payments accumulated for previous periods—must be same as Line 29 of preceding report except that this line must be zero if this is the first financial report for this election campaign
27. Add Line 25 plus Line 26
28. Campaign costs refunded this period—from Line 2F
29. Subtract—Line 27 less Line 28
30. Unpaid bills payable at end of period—from Line 21
31. Total campaign costs to date—Line 29 plus Line 30

ALLOCATION OF CAMPAIGN COSTS TO CANDIDATE(S)

This section need only be completed by a Committee in support of more than one Candidate

[illegible]

Statement period — from 1/15/86 to 7/15/86
Date Date

NON CASH CONTRIBUTIONS

SCHEDULE 2B

DATE	FULL NAME	MAILING ADDRESS	PURPOSE OF PAYMENT OR DESCRIPTION OF ITEM	AMOUNT PAID OR VALUE OF ITEM
Campaign expenses paid by:				
Property given by:				
Services or facilities provided by:				
6/16/86	Morgan Guaranty Co.	23 Wall Street New York, N.Y. 10015	secretarial services, handling phone calls for fundraiser in N.Y.C. on 6/16/86	150.00
6/16/86	Packard Press	475 Park Avenue South New York, N.Y. 10016	postage and stationery	250.00
(FORGIVENESS OF LOANS OR UNPAID BILLS SHOULD NOT BE SHOWN ON THIS SCHEDULE—SEPARATE SCHEDULES ARE USED FOR SUCH TRANSACTIONS)				TOTAL 400.00

REFUNDS OF CAMPAIGN EXPENDITURES

SCHEDULE 2F

DATE RECEIVED	FULL NAME	MAILING ADDRESS	AMOUNT REFUNDED
TOTAL			0.00

OTHER RECEIPTS

SCHEDULE 2G

DATE RECEIVED	FULL NAME	MAILING ADDRESS	AMOUNT	TYPE OF RECEIPT
2/28/86	Chase Lincoln First	One Lincoln First Square Rochester, New York 14643	175.66	Int. CD Acct. Jc #67005769 & F
3/31/86	Chase Lincoln First	One Lincoln First Square Rochester, New York 14643	151.19	Int. CD Acct. March #67005769
4/30/86	Chase Lincoln First	One Lincoln First Square Rochester, New York 14643	146.30	Int. CD Acct. April #67005769
5/31/86	Chase Lincoln First	One Lincoln First Square Rochester, New York 14643	151.19	Int. CD Acct. May #67005769
6/30/86	Chase Lincoln First	One Lincoln First Square Rochester, New York 14643	146.30	Int. CD Acct. June #67005769
1-7/86	Key Bank	17 Court Street Buffalo, New York 14202	156.20	Int. Savings #530-007198
TOTAL			926.84	

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Statement period — from 1/15/86 to 7/15/86
Date Date

LOANS RECEIVED

SCHEDULE 2D

DATE RECEIVED	FULL NAME	MAILING ADDRESS	AMOUNT
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SCHEDULE 2D — List any loans received during the reporting period. A copy of the evidence of indebtedness for each loan must be attached to the statement. If the loan was received from a lending institution, there must be included on the evidence of indebtedness the name and address of the obligor of the loan or any other person who endorses, co-signs, guarantees, or otherwise provides security for such loan. The name of this person should also be recorded on the schedule under the name of the lending institution.

(EVIDENCE OF INDEBTEDNESS FOR LOANS LISTED ABOVE MUST BE ATTACHED)			TOTAL 0.00

LOAN REPAYMENTS

SCHEDULE 5D

DATE PAID	FULL NAME	MAILING ADDRESS	AMOUNT	DATE OF LOAN
			TOTAL 0.00	

LOANS FORGIVEN

SCHEDULE 12

DATE FORGIVEN	FULL NAME	MAILING ADDRESS	AMOUNT	DATE OF LOAN
(EVIDENCE FROM LENDERS INDICATING FORGIVENESS MUST BE ATTACHED)			TOTAL 0.00	

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Statement period — from 1/15/86 to 7/15/86
Date Date

MONETARY CONTRIBUTIONS

SCHEDULE 2A

List all monetary contributions which exceed \$99. The date of receipt, full name and mailing address must be given. Do not report receipts from other political committees on this schedule.

Identify contributions from relatives or corporations by placing a check-mark in the appropriate column. For this purpose, a relative is the candidate's child, parent, grandparent, brother, sister, and the spouse of any of those.

It is not required that contributions of less than \$100 be individually listed. These contributors may be grouped together in a single amount and reported on the line provided in the summary section of this schedule. However, if a contributor in this period has contributed an amount, which when added to his previous contributions for this campaign now exceeds \$99, such contributor must now be individually listed.

For each listed contributor, who has made previous contributions to this campaign, show the total previous contributions in the box provided for this purpose.

DATE RECEIVED	Relative	Corp.	FULL NAME	MAILING ADDRESS	AMOUNT	PREVIOUS AMOUNTS -IF ANY
1/17/86			Morgan Companies New York PAC	23 Wall Street New York, New York 10015	200.00	
1/17/86			Stephen Zappia	20 York Street Buffalo, New York 14213	150.00	
2/6/86			Shearson Lehman Peter A. Avalone	World Financial Center New York, New York 10285	200.00	
2/26/86		X	Prudential Bache	4900 Merrick Road Massapequa Park, N.Y. 11762	500.00	
2/26/86			Edward C. Cosgrove	237 Main Street, Ste. 1000 Buffalo, New York 14202	1,000.00	
4/14/86		X	E.F. Hutton CO.	One Battery Park Plaza New York, New York 10004	500.00	
5/1/86			William J. Gillard	52 Brush Hill Rd. Kinnelon, N.J. 07405	1,000.00	
5/2/86			Stephen D. Goddard	333 South Grand, Suite 2400 Los Angeles, Cal. 90071	1,000.00	
5/2/86			Robert F. Goldhammer	74 Arlington Street Winchester, MA. 01890	1,000.00	
5/17/86			Peter D. Goodson	52 Prescott Avenue Bronxville, New York 10706	1,000.00	
4/30/86			A. H. Gordon	10 Gracie Square New York, New York 10028	1,000.00	
4/7/86			David M. McAuliffe	736 Mildred Street Teaneck, N.J. 07666	300.00	
4/16/86			Paul A. Maffeo	2600 Seattle Frist Bldg. Seattle, Washington 98154	300.00	
6/9/86			William P. Maloney	New York, New York	300.00	
4/12/86			Richard C. Makin	New York, New York	300.00	
3/21/86			John A. McColl	5942 Henley Drive San Diego, Cal. 92120	300.00	
3/24/86			Joseph W. Martin, Jr.	2 Hesketh Court Menlo Park, CA. 94025	300.00	
4/1/86			Kenneth C. Marklev	1225 Carriage Lane La Grange, Il. 60525	300.00	
5/12/86			Joseph P. Markey	472 Tenth Street Brooklyn, New York 11215	300.00	
Sub- TOTAL					9,950.00	

SUMMARY (To be completed on last page of schedule 2A)

Total unitemized contributions this period

Total itemized contributions this period — all pages

Total contributions received this period

DO NOT COMPLETE UNLESS THIS IS LAST CONTRIBUTION PAGE

Over

Statement period — from 1/15/86
Dateto 7/15/86
Date

MONETARY CONTRIBUTIONS

SCHEDULE 2A

DATE RECEIVED	Relative	Corp.	FULL NAME	MAILING ADDRESS	AMOUNT	PREVIOUS AMOUNTS -IF ANY
4/29/86			Peter G. Mastrangelo	New York, New York	300.00	
3/24/86			Carter C. Mathies	1245 S.W. 84th Avenue Portland, Oregon 97225	300.00	
3/24/86			Joseph P. Martorella	81 Lahey Street New Hyde Park, New York 11040	300.00	
3/30/86			Bernard C. Grigsby, II	P.O. Box 645, Wall St. Station New York, New York 10005	700.00	
3/31/86			T. G. Carbonar	12115 San Vicente Blvd. West Los Angeles, CA. 90049	700.00	
6/3/86			Raymond Matison	127 Ralston Avenue South Orange, N.J. 07079	300.00	
6/16/86			Sandra Mokuvus Bellush	c/o Chemical Bank, 380 Madison Ave., N.Y., N.Y. 10017	200.00	
6/16/86			George Borris, Frank Soltis & Greg Hickock	c/o Chase PAC, 1 Chase Man- hattan Plaza, N.Y., N.Y. 10081	600.00	
6/16/86			Robert F. Grimmig	New York, New York	200.00	
6/16/86			Maurice Sonnenberg	New York, New York	200.00	
6/16/86			William N. Hudson, Jr.	4985 Sheridan Drive Williamsville, N.Y. 14221	200.00	
6/13/86			Stephen Kohlmann	26 Cedar Avenue Coram, New York 11727	100.00	
6/10/86			Raymond V. DiScala	24 Harbor Hill Drive Lloyd Harbor, N.Y. 11743	100.00	
6/12/86		X	First Albany Corp.	41 State St., P.O. Box 52 Albany, N.Y. 12201	200.00	
6/17/86			Larry R. Hammond	167c New Freedom Berlin, N.J. 08009	200.00	
6/16/86			John K. Dierkes	285 Riverside Drive, 13C New York, New York 10025	200.00	
6/16/86			Amos T. Beason	26 Ox Bow Lane Summit, N.J. 07901	200.00	
6/16/86		X	I.D.B.I. Managers, Inc.	175 Water Street New York, New York 10038	200.00	
6/16/86			Dillon Read Political Action Committee	19 Rector Street, 8th Floor New York, New York 10006	400.00	
6/11/86		X	Rogers & Wells, P.C.	200 Park Avenue New York, New York 10166	400.00	
6/5/86			Robert B. Nolan, Jr.	20 Park Avenue Bronxville, N.Y. 10708	100.00	
6/16/86		X	United Daniels Securities, Inc.	170 Broadway, Suite 1200 New York, New York 10038	400.00	
Sub - TOTAL					16,450.00	

SUMMARY (To be completed on last page of schedule 2A)

Total unitemized contributions this period _____

Total itemized contributions this period — all pages _____

Total contributions received this period _____

DO NOT COMPLETE UNLESS THIS IS LAST CONTRIBUTION PAGE

Statement period — from 1/15/86 to 7/15/86
Date Date

MONETARY CONTRIBUTIONS

DATE RECEIVED	Relative	Corp.	FULL NAME	MAILING ADDRESS	AMOUNT	PREVIOUS AMOUNTS -IF ANY
6/12/86			Committee for Effective Government	Morgan PAC New York, New York	500.00	
6/11/86			Walter T. Kicinski	32 Woodhollow Road Lawrenceville, N.J. 08648	200.00	
6/16/86			John Mus	42 W. 87th Street, No. 48 New York, New York 10024	100.00	
6/14/86			Courtney A. Haff	16 Hudson Street New York, New York 10013	200.00	
6/10/86			Bernard R. Bober	16 Colts Foot Glen Road Saddle River, N.J. 07458	250.00	
6/10/86			Cheryl E. Jones	215 West 91 Street, Apt. 64 New York, New York 10024	200.00	
6/3/86			Chester J. Straub	One Citicorp Center, 153 E. 53rd St., N.Y., N.Y. 10022	200.00	
6/16/86			William Pinakiewicz	249 Kimball Avenue Westfield, N.J. 07090	800.00	
6/16/86			Jeremiah C. Whalen	503 Seabrook Drive Williamsville, N.Y. 14221	200.00	
6/9/86			Burt R. Ehrlich	80 Pine Street New York, New York 10005	250.00	
6/17/86			Gedale Bob Horowitz	One New York Plaza New York, New York 10004	400.00	
6/16/86			Nelson D. Civello	140 Broadway New York, New York	200.00	
6/18/86			Ronald E. Curvin	140 Broadway New York, New York	200.00	
6/9/86			John H. Dyson	c/o Wakefield National, Inc. 2 Park Ave., N.Y., N.Y. 10016	500.00	
Miscellaneous contributions					140.00	
6/11/86			J. Chester Johnson	32 Woodhollow Road Lawrenceville, N.J. 08648	200.00	
6/23/86		X	Brown & Wood, P.C.	One World Trade Center New York, New York 10048	500.00	
TOTAL					21,490.00	

SUMMARY (To be completed on last page of schedule 2A)

Total unitemized contributions this period

140.00

Total itemized contributions this period — all pages

21,350.00

Total contributions received this period

21,490.00

DO NOT COMPLETE UNLESS THIS IS LAST CONTRIBUTION PAGE

35040522395

Statement period — from 1/15/86 to 7/15/86
Date Date

CAMPAIGN EXPENSES PAID

SCHEDULE 5A

DATE PAID	FULL NAME	MAILING ADDRESS	AMOUNT	PURPOSE OF DISBURSEMENT
1/22/86	Amherst Democratic Committee	333 Dick Road Depew, New York 14043	10.00	raffle tickets
1/24/86	Accurate Campaign Lists	3997 Genesee Street Cheektowaga, New York 14225	250.00	contribution lists
1/24/86	Wiechec's Social Club	1748 Clinton Street Buffalo, New York	65.00	* pg. ad program
1/24/86	Sunrise Press	574 Fillmore Avenue Buffalo, New York 14212	211.60	printing of tickets
1/27/86	Mercy Hospital Foundation	565 Abbott Road Buffalo, New York 14220	100.00	2 tickets
1/27/86	The Cane Fund	Grand Island, New York	500.00	donation
1/30/86	Blackthorns	245 Abbott Road Buffalo, New York 14220	15.00	1986 annual dues
1/30/86	Friends of Sheriff Tom F. Higgins	56 Mumford Avenue Buffalo, New York 14220	50.00	advertising
1/30/86	Cynthia A. Wojtanik	76 Wood Street Lackawanna, New York 14218	75.00	secretarial services, Jan.
1/31/86	New Democratic Coalition	New York, New York	100.00	1 ticket
2/4/86	U.S. Postmaster	Niagara Square Station Buffalo, New York 14202	44.00	2 rolls of stamps
2/4/86	N.Y. Telephone Co.	1600 Rand Building Buffalo, New York 14203	91.16	car phone 1/25 - 2/24
2/6/86	Robert E. Whelan	1111 Amherst Street Buffalo, New York 14216	265.00	Jan. out-of-pocket exp.
2/6/86	Kathy Gregorie	156 Weyand Street Buffalo, New York 14210	37.80	reimbursement scrapbook
2/10/86	Amherst Gaelic League	5707 Main Street Williamsville, New York 14221	120.00	10 tickets
2/14/86	Bishop Timon High School	601 McKinley Parkway Buffalo, New York 14220	25.00	* page - advertising
2/21/86	Easter Seal Society	974 Kenmore Avenue Buffalo, New York 14216	50.00	5 tickets
2/21/86	U.S. Postmaster	Niagara Square Station Buffalo, New York 14202	66.00	3 rolls stamps
2/26/86	Larry Goldberg	Buffalo, New York	65.00	reimbursement St. Pat cards
2/28/86	Cynthia A. Wojtanik	76 Wood Street Lackawanna, New York 14218	75.00	secretarial services - Feb.
2/28/86	Benefit for Tom & Jane O'Malley	245 Abbott Road Buffalo, New York 14220	60.00	4 tickets
2/28/86	The Hyatt Regency	2 Fountain Plaza Buffalo, New York 14202	270.60	luncheon meeting 2/25
3/4/86	Forum Restaurant	Buffalo, New York	21.74	breakfast meeting 3/4
3/5/86	Robert E. Whelan	1111 Amherst Street Buffalo, New York 14216	215.00	out-of-pocket exp. - Feb.
3/11/86	Internal Revenue Service	Lowell Street Andover, Mass.	30.00	payment of 1120 POL tax
3/12/86	Vilando Printing	326 Connecticut Street Buffalo, New York 14213	653.40	letterhead & stationery
Sub - TOTAL			3,466.30	

95040522307

Statement period — from 1/15/86
Dateto 7/15/86
Date

TRANSFERS IN

SCHEDULE 2E

DATE RECEIVED	FULL NAME	MAILING ADDRESS	AMOUNT
TOTAL			0.00

TRANSFERS OUT

SCHEDULE 5E

DATE PAID	FULL NAME	MAILING ADDRESS	AMOUNT
1/24/86	Chase Lincoln First Bank	One Lincoln First Square Rochester, New York 14643	10,567.37
TOTAL			10,567.37

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Statement period — from 1/15/86 to 7/15/86
Date Date

CAMPAIGN EXPENSES PAID

SCHEDULE 5A

DATE PAID	FULL NAME	MAILING ADDRESS	AMOUNT	PURPOSE OF DISBURSEMENT
DO NOT report Transfers Out, use Schedule 5E				
3/24/86	Buffalo Telephone Co.	1600 Rand Building Buffalo, New York 14203	85.48	car phone 2 mos.
3/31/86	Erie County Committee Conservative Party N.Y.	263 Statler Building Buffalo, New York 14202	80.00	2 tickets
3/31/86	Cynthia A. Woitanik	76 Wood Street Lackawanna, New York 14218	75.00	secretarial services - Mar
3/31/86	Erie County Committee - Conservative Party N.Y.	263 Statler Building Buffalo, New York 14202	45.00	1/4 pg. ad
3/31/86	Zone 16 Democratic Comm.	232 E. Amherst Street Buffalo, New York 14214	5.00	5 raffle tickets
4/7/86	Robert E. Whelan	1111 Amherst Street Buffalo, New York 14216	205.00	Mar. out of pocket expen.
4/7/86	University District Democratic Club	163 Marth Avenue Buffalo, New York 14215	12.00	2 tickets
4/7/86	University District Democratic Club	163 Marth Avenue Buffalo, New York 14215	15.00	1/4 pg. ad
4/8/86	Committee to Re-Elect Joanne I. Skorka	546 Richmond Avenue Buffalo, New York 14222	20.00	1 ticket
4/8/86	Trocaire College	110 Red Jacket Parkway Buffalo, New York 14220	35.00	1 ticket
4/14/86	Frontier Democratic Club	210 Voorhees Avenue Buffalo, New York 14214	25.00	1/4 page ad
4/14/86	Community Action Organi- zation of Erie Co.	70 Harvard Place Buffalo, New York 14209	18.50	1/8 pg. ad
4/14/86	Buffalo-Dortmund Sister City Committee	91 Pine Street East Aurora, N.Y. 14052	15.00	3 tickets
4/15/86	U.S. Postmaster	Niagara Square Buffalo, New York 14202	88.00	4 rolls of stamps
4/18/86	Greater Buffalo Demo- cratic Women's Club	9040 Main Street Clarence, New York 14031	24.00	2 tickets
4/18/86	Frontier Democratic Club	24 Ross Avenue Buffalo, New York 14207	40.00	2 tickets
4/23/86	North Buffalo Jaycees	P.O. Box 252 Buffalo, New York 14216	15.00	1/4 pg. ad
4/23/86	Hillery Memorial Scholarship Foundation	601 McKinley Parkway Buffalo, New York 14220	10.00	honorary patron ad
4/30/86	W.N.Y. Chapter of Arthritis Foundation	Niagara Falls Blvd. Tonawanda, New York 14150	250.00	donation
5/1/86	Ronald McDonald House of Buffalo	780 West Ferry Street Buffalo, New York 14222	50.00	special patron ad
5/1/86	Mercy Hospital Men's Sustaining Society	565 Abbott Road Buffalo, New York 14220	20.00	membership due & 3 raffle tck
5/6/86	Robert E. Whelan	1111 Amherst Street Buffalo, New York 14216	270.00	out-of-pocket expenses-April
Sub -TOTAL			4,869.28	

SUMMARY (To be completed on last page of schedule 5A)

Total unitemized expenses this period _____

Total itemized expenses this period — all pages _____

Total campaign expenses expended this period _____

DO NOT COMPLETE UNLESS THIS IS LAST CAMPAIGN EXPENSE PAGE

95040522399

Statement period — from 1/15/86 to 7/15/86
Date Date

CAMPAIGN EXPENSES PAID

SCHEDULE 5A

DATE PAID	FULL NAME	MAILING ADDRESS	AMOUNT	PURPOSE OF DISBURSEMENT
DO NOT report Transfers Out, use Schedule 5E				
5/7/86	Erie County Democratic Town Chairmen's Assoc.	87 Clark Street Orchard Park, N.Y. 14127	20.00	1 ticket
5/7/86	W.N.Y. Chapter of Arthritis Foundation	Niagara Falls Blvd. Tonawanda, New York 14150	80.00	1 ticket
5/19/86	Puerto-Rican American Community Association	110 Hartwell Road Buffalo, New York 14216	25.00	1 pg. ad
5/20/86	Preservation Coalition of Erie County	20 Angle Street Buffalo, New York 14214	15.00	membership dues
5/22/86	Lotus Club	5 East 66th Street New York, New York 10021	500.00	deposit for room-fundraiser in N.Y.C. on 6/16/86
5/28/86	Cynthia A. Wojtanik	76 Wood Street Lackawanna, New York 14218	150.00	secretarial services, April 11
5/28/86	Inner City Concerned Citizens	56 North Parade Avenue Buffalo, New York 14211	25.00	1 ticket
5/28/86	Frontier Democratic Club	24 Ross Avenue Buffalo, New York 14207	15.00	membership dues
5/29/86	Robert E. Whelan	1111 Amherst Street Buffalo, New York 14216	370.00	out-of-pocket expenses, May
5/30/86	Women's Division of Erie Co. Democratic Committee	220 Delaware Avenue, #425 Buffalo, New York 14202	20.00	1 pg. ad
5/30/86	Citizens for Hoyt	Buffalo, New York	30.00	1 ticket
6/5/86	Committee to Re-Elect Mazurek	1202 Broadway Buffalo, New York 14212	40.00	2 tickets
6/5/86	Erie ARC	Buffalo, New York	25.00	contribution Walkathon 6/7
6/6/86	U.S. Air	Greater Bflo. Int. Airport Cheektowaga, N.Y. 14225	672.00	Airfare for committee for fundraiser in N.Y.C. 6/16
6/9/86	U.S. Postmaster	Niagara Square Station Buffalo, New York 14202	44.00	2 rolls stamps
6/9/86	Nicholas Sargent	15 Court Street Buffalo, New York 14202	49.00	reimbursement of expenses for N.Y.C. fundraiser 6/16
6/17/86	Robert E. Whelan	1111 Amherst Street Buffalo, New York 14216	620.00	reimbursement for hotel, meal, transportation N.Y.C. fundraiser
6/17/86	Lotus Club	5 East 66th Street New York, New York 10021	935.00	balance due 6/16 N.Y.C. fundraiser
Sub-TOTAL			8,504.28	

SUMMARY (To be completed on last page of schedule 5A)

Total unitemized expenses this period _____

Total itemized expenses this period — all pages _____

Total campaign expenses expended this period _____

DO NOT COMPLETE UNLESS THIS IS LAST CAMPAIGN EXPENSE PAGE

BOARD OF ELECTIONS
ERIE COUNTY, N.Y.

JUN 4 4 55 PM '86

FRIENDS OF BOB WHELAN
c/o 700 Cathedral Park Tower
37 Franklin Street
Buffalo, New York 14202

May 30, 1986

Democratic Headquarters
Erie County Board of Elections
134 West Eagle Street
Buffalo, New York 14202

RE: FRIENDS OF BOB WHELAN

Dear Sirs:

Per your instructions in Paragraph "A" of Campaign Finance Guide for Candidates and Political Committees, please be advised that five contributions in the amount of \$1,000 each have been received by our committee, which are as follows:

1) William J. or Dorothy D. Gillard	\$1,000.00
2) Stephen D. and Deborah G. Goddard	1,000.00
3) Robert F. Goldhammer	1,000.00
4) Peter D. and Terry D. Goodson	1,000.00
5) A. H. Gordon	1,000.00

I have enclosed photocopies of those checks.

If any additional information is requested, please do not hesitate to contact me.

Very truly yours,

FRIENDS OF BOB WHELAN

Cynthia A. Wojtanik
By

Cynthia A. Wojtanik

cw
Enclosure

85040522402

No. 36576

A. H. GORDON
10 Gracie Square
New York, NY 10028

April 30 19 86

PAY TO THE ORDER OF Friends of Bob Whelan \$ 1,000.00

One Thousand and no/100 DOLLAR

NEW YORK

NEW YORK, N.Y. 10008

A. H. Gordon

⑆01576⑆ ⑆021000018⑆

⑈24 8606⑈

WILLIAM J. OR DOROTHY D. GILLARD
52 BRUSH HILL RD. PH. 201-495-3488
KINNELON, NJ 07405

2207

Pay to the Order of

Friends of Bob Whelan

Date 5/1 1986

\$ 1,000.00

Dollar

U.S. Trust

UNITED STATES TRUST CO.
OF NEW YORK
46 Wall Street
New York, N.Y. 10005

Memo

William J. Gillard

⑆021001318⑆

61 4065 3⑈ 2207

STEPHEN D. GODDARD
Premium Account

STEPHEN D. GODDARD
DEBORAH GODDARD
333 SOUTH GRAND, SUITE 2400
LOS ANGELES, CA 90071

316

May 2 1986 25-30/440

PAY TO THE ORDER OF

Friends of Bob Whelan

\$ 1000.00

One Thousand and no/100

DOLLARS

BANK ONE.

BANK ONE OF COLUMBUS, NA
Columbus, Ohio 43271

MEMO

Stephen D. Goddard

⑆044000804⑆ 4229052034⑈ 0316

85040622403

ROBERT F. GOLDHAMMER
74 Arlington Street
Winchester, MA 01890

2666

PAY TO THE ORDER OF

Frank J. Bob Whitman 10-1-2 1986 3-13
One thousand and no 110
DOLLARS

 BANK OF NEW ENGLAND, N.A.
BOSTON, MASSACHUSETTS

Memo:

Robert F. Goldhammer

⑆011000138⑆ 1168 3828 2666

PETER D. GOODSON
TERRY D. GOODSON
52 PRESCOTT AVE.
BRONXVILLE, NY 10708

5553

Pay to the
Order of

Friends of East Hill School 1-131
One thousand and no 200
Dollars

U.S. Trust

UNITED STATES TRUST CO.
OF NEW YORK
45 Wall Street
New York, N.Y. 10005

Memo:

Terry Goodson

⑆02100138⑆ 61 0325 5553

86040522404

PRELIMINARY OFFICIAL STATEMENT DATED AUGUST 5, 1986

NEW ISSUES

Ratings: See "Ratings" herein

In the opinion of Bond Counsel, interest on the Bonds is exempt, under existing statutes, from federal income taxes and, under existing statutes, interest on the Bonds is exempt from personal income taxes of New York State and its political subdivisions, including The City of New York. For information regarding certain legislation which may affect the exemption of interest on the Bonds from federal income taxation, see "Pending Federal Tax Legislation", herein.

\$55,424,000***City of Buffalo, New York**

Dated: August 1, 1986

Due: February 1, as shown below

\$40,684,000 General Improvement Serial Bonds—1986-D and**\$2,390,000 General Improvement Water Supply Serial Bonds—1986-F**

Series D Amount	Series F Amount	Maturity	Interest Rate	Price	Series D Amount	Maturity	Interest Rate	Price
\$ 300,000		1987	%	%	\$1,160,000	2003		
1,714,000	\$160,000	1988			1,160,000	2004		
1,710,000	160,000	1989			1,185,000	2005		
1,725,000	160,000	1990			1,205,000	2006		
1,900,000	160,000	1991			705,000	2007		
1,860,000	135,000	1992			705,000	2008		
1,920,000	135,000	1993			705,000	2009		
1,965,000	135,000	1994			730,000	2010		
2,010,000	155,000	1995			750,000	2011		
2,115,000	155,000	1996			750,000	2012		
2,065,000	155,000	1997			750,000	2013		
2,100,000	165,000	1998			775,000	2014		
2,115,000	175,000	1999			775,000	2015		
2,070,000	180,000	2000			775,000	2016		
1,680,000	180,000	2001						
1,305,000	180,000	2002						

\$12,350,000 School Serial Bonds—1986-E

Amount	Maturity	Interest Rate	Price	Amount	Maturity	Interest Rate	Price
\$ 535,000	1988	%	%	\$ 600,000	1998	%	%
535,000	1989			600,000	1999		
535,000	1990			600,000	2000		
535,000	1991			600,000	2001		
580,000	1992			600,000	2002		
590,000	1993			680,000	2003		
660,000	1994			680,000	2004		
660,000	1995			680,000	2005		
660,000	1996			680,000	2006		
660,000	1997			680,000	2007		

Accrued Interest to be added

The Bonds will be issued in fully registered form in denominations of \$5,000 or any integral multiple thereof for any single maturity, except that one bond for the 1988 maturity of the General Improvement Serial Bonds-1986-D may be issued in a denomination which is or includes an amount less than the authorized multiple. Principal, when due, will be payable at the principal corporate trust office of The Chase Manhattan Bank, N.A., New York, New York, the Fiscal Agent for the Bonds. Interest on the Bonds will be payable on February 1, 1987, August 1, 1987 and semi-annually thereafter on February 1 and August 1 in each year to maturity. Such interest is payable by check mailed on each such interest payment date to the registered owner at his address as shown on the registration books of the Fiscal Agent as of the fifteenth day of the month next preceding each such interest payment date. The Bonds maturing in the years 1987 through 1996 are not subject to prior redemption. The Bonds maturing in 1997 and thereafter are redeemable at the option of the City on February 1, 1996, and thereafter on any interest payment date at declining redemption prices not exceeding 101%, as described herein.

The Bonds will constitute general obligations of the City and will contain a pledge of its faith and credit for the payment of the principal of and interest on the Bonds and all the taxable real property within the City is subject to the levy of ad valorem taxes, without limitation as to rate or amount, for such purpose.

The Bonds are offered when, as and if issued and received by the Underwriters and subject to the final approving opinion of Hawkins, Delafield & Wood, Bond Counsel, New York, New York and certain other conditions.

Certain legal matters will be passed upon for the Underwriters by Rogers & Wells, New York, New York. It is expected that delivery of the Bonds in definitive form will be made on or after August 27, 1986, in New York, New York.

Shearson Lehman Brothers Inc.**The First Boston Corporation****E.F. Hutton & Company Inc.****Marine Midland Bank, N.A.****Dillon, Read & Co. Inc.****PaineWebber**
Incorporated**Kidder, Peabody & Co.**
Incorporated

August 1, 1986

* Preliminary, subject to change

EXHIBIT "2"

This Preliminary Official Statement and the information contained herein are subject to completion, amendment or other change without any notice. The securities described herein may not be sold nor may offers to buy be accepted prior to the time the Official Statement is delivered in final form. Under no circumstances shall this Preliminary Official Statement constitute an offer to sell or the solicitation of an offer to buy nor shall there be any sale of these securities in any jurisdiction in which such offer, solicitation or sale would be unlawful prior to registration or qualification under the applicable securities laws of any such jurisdiction.

UNDERWRITING

The Bonds are being purchased for reoffering by the Underwriters set forth on the cover page hereof, for whom Shearson Lehman Brothers Inc. is acting as Managing Underwriter, at an aggregate purchase price for the Bonds of \$ _____ plus accrued interest. The aggregate initial offering price for the Bonds will be \$ _____ plus accrued interest. The Contract of Purchase provides that the Underwriters will purchase all of the Bonds if any Bonds are purchased.

The Underwriters may offer and sell Bonds to certain dealers and others at prices other than the initial offering prices. The offering prices may be changed from time to time by the Underwriters.

ADDITIONAL INFORMATION

The Official Statement is not to be construed as a contract or agreement between the City and the purchasers or holders of any of the Bonds. Any statements made in this Official Statement involving matters of opinion, whether or not expressly so stated, are intended merely as an opinion and not as representations of fact. The information and expressions of opinion herein are subject to change without notice and neither the delivery of this Official Statement nor any sale made hereunder shall, under any circumstances, create any implication that there has been no change in affairs in the City since the date hereof.

Morgan Guaranty Trust Company of New York has served as financial advisor to the City of Buffalo in certain matters with respect to the sale of the Bonds.

Additional information may be obtained upon request from the office of the City Comptroller, Robert E. Whelan, Room 1225 City Hall, Buffalo, New York 14202 (716-855-5255) or from Frances L. Miley, Morgan Guaranty Trust Company, 10th Floor, 15 Broad Street, New York, New York 10015, (212) 483-7272.

The execution of this Official Statement and its delivery have been duly authorized by the Comptroller.

CITY OF BUFFALO

By: _____
ROBERT E. WHELAN, *Comptroller*

August , 1986

Whelan Used City-Tied Bank To Raise Funds

By GEORGE BORRELLI
News Political Reporter

Buffalo Comptroller Robert E. Whelan, who has called for strict enforcement of codes of ethics for public officials, used a bank that does business with the city to help arrange a fund-raiser held for him last month.

Whelan said Tuesday the bank, Morgan Guaranty Trust Co. of New York City, accepted some telephone reservations for his \$200-a-ticket fund-raiser held June 16 in the Lotos Club in Manhattan.

But Whelan insisted there was "no conflict of interest, nothing improper" in the role played by the bank, which serves as financial adviser to Buffalo in the sale of bonds and revenue notes.

However, Richard Planavsky, commissioner of administration and finance in the administration of Mayor Griffin, disagreed.

Planavsky, who unsuccessfully challenged Whelan in the Democratic primary for city comptroller in 1983, said the bank's role in the fund-raiser poses "serious questions of propriety" since the power to hire the bank as financial adviser to the city rests solely with Whelan.

He noted that Whelan recently recommended the creation of the Ethics in Government and Elections Committee of Erie County to enforce a code of ethics for all elected officials in the county.

"If the committee is formed, I think it would be appropriate for the panel to look into this kind of activity," said Planavsky of the Whelan fund-raiser.

Whelan said in a press release issued Monday that the fund-raiser had "brought together 40 to 50 personal friends and business associates" to help celebrate his birthday and "assist his future political activities."

The party netted about \$8,000, according to Whelan, whose political options for 1987 include running for re-election or for Erie County executive.

Invitations for the fund-raiser were sent out by the New York Friends of Robert E. Whelan. The committee listed an RSVP telephone number in the Public Finance Section of Morgan Guaranty Trust Co.

Whelan said the service was provided by the bank as a courtesy and would be reported on his financial disclosure statement as an "in-kind contribution" valued at about \$150.

"The bank had no role of any consequence," asserted Whelan, who said three employees of the bank attended his fund-raiser on a combined contribution of \$500.

Whelan said he has been in the forefront of efforts to reform election campaign laws, especially in the area of expenditures, which he wants curtailed, and in the amount of contributions, which he wants limited to \$1,000 from individuals and \$2,000 from corporations.

The comptroller said he gives no credence to Planavsky's suggestions of a possible conflict, asserting:

"Mr. Planavsky doesn't have the facts and is re-living the defeat he suffered three years ago."

86040622408



Joan D. Aikens
Chairman
Federal Election Commission
Washington, D.C. 20463



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 24, 1986

Richard Planavsky
Commissioner of Administration and Finance
203 City Hall
Buffalo, NY 14202

Dear Sir:

This will acknowledge receipt of your letter which we received on July 18, 1986, inquiring about a possible violation of the Federal Election Campaign Act of 1971, as amended ("the Act").

The 1976 amendments to the Act and Commission regulations require that a complaint meet certain specific requirements. Since your letter does not meet these requirements, the commission can take no action at this time to investigate this matter.

However, if you desire the Commission to look into the matter discussed in your letter, to determine if the FECA has been violated, a formal complaint as described in 2 U.S.C. 437g(a) (1) must be filed. Requirements of this section of the law and Commission regulations at 11 C.F.R. 111.4 which are a prerequisite to Commission action are detailed below:

- (1) A complaint must be in writing. (2 U.S.C. 437g(a) (1)).
- (2) Its contents must be sworn to and signed in the presence of a notary public and shall be notarized. (2 U.S.C. 437g(a) (1)).
- (3) A formal complaint must contain the full name and address of the person making the complaint. This information will be made known to any and all respondents upon the notification of the complaint.
- (4) A formal complaint should clearly identify as a respondent each person or entity who is alleged to have committed a violation. (11 C.F.R. 111.4).

86040522409

- 86040522410
- (5) A formal complaint should identify the source of information upon which the complaint is based. (11 C.F.R. 111.4).
 - (6) A formal complaint should contain a clear and concise recitation of the facts describing the violation of a statute or law over which the Commission has jurisdiction. (11 C.F.R. 111.4).
 - (7) A formal complaint should be accompanied by supporting documentation if known and available to the person making the complaint. (11 C.F.R. 111.4).

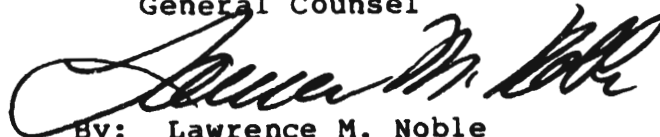
Finally, please include your phone number, as well as the full names and addresses of all respondents.

Enclosed are excerpts of the Commission regulations, and your attention is directed to 11 C.F.R. 111.4 through 111.10 that deal with preliminary enforcement procedures. I trust these materials will be helpful to you should you wish to file a legally sufficient complaint with the Commission. The file regarding this correspondence will remain confidential for a fifteen day time period during which you may file an amended complaint as specified above. Please forward to us any additional information or correspondence that you may have regarding this matter.

If we can be of any further assistance, please do not hesitate to call me at (202) 376-8200.

Sincerely,

Charles N. Steele
General Counsel


By: Lawrence M. Noble
Deputy General Counsel

Enclosures
Excerpts
Procedures

cc: Respondents



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 24, 1986

Mr. Robert E. Whelan
City Comptroller
City Hall
Buffalo, NY 14202

Dear Sir:

On July 18, 1986, the Federal Election Commission received a letter alleging that you may have violated sections of the Federal Election Campaign Act, as amended. As indicated from the copy of the enclosed letter addressed to the complainant, those allegations do not meet certain specific requirements for the proper filing of a complaint. Thus, no action will be taken on this matter unless the allegations are refiled meeting the requirements for a properly filed complaint. If the matter is refiled, you will be notified at that time.

This matter will remain confidential for 15 days to allow for the correction of the defects. If the defects are not cured and the allegations are not refiled, no additional notification will be provided and the file will be closed.

If you have any questions, please call Lorraine Ramos, Docket Chief, at (202) 376-3110.

Sincerely,

Charles N. Steele
General Counsel

A handwritten signature in dark ink, appearing to read "Lawrence M. Noble", is written over the typed name of the Deputy General Counsel.

By: Lawrence M. Noble
Deputy General Counsel

Enclosures

Copy of Improper Complaint
Copy of letter to the Improper Complainant

95740622411

CCC# 975



CITY OF BUFFALO
DEPARTMENT OF ADMINISTRATION AND FINANCE

203 CITY HALL BUFFALO, NEW YORK

RICHARD PLANAVSKY
COMMISSIONER

July 15, 1986

Joan D. Aikens
Chairman
Federal Election Commission
Washington, D.C. 20463

Dear Ms. Aikens:

I hereby request that the Federal Elections Commission investigate a matter that was reported on July 9, 1986 in a front page story in the Buffalo News (attached).

The story disclosed that City of Buffalo Comptroller Robert E. Whelan held a \$200-a-ticket fund-raising party in New York City on June 16, 1986, and that Morgan Guaranty Trust Co., a bank which provides fiscal advisory service to the City of Buffalo, helped to arrange the fund-raiser. The invitations to the party listed a telephone number for reservations which is a phone number of the Public Finance Section of Morgan Guaranty.

Mr. Whelan is quoted in the story as defending the bank's services with respect to arranging the party by saying that it was an "in-kind contribution," valued at about \$150. Would this "in-kind contribution" be prohibited by 2 U.S.C. Section 441. b(a) of federal election law. Also, if tickets to this fund-raising party were sold in New York City to certain banks and corporations, would this also be a violation of the above statute?

The City of Buffalo Comptroller has the authority to negotiate City bond sales and uses Morgan Guaranty to advise him. Hundreds of thousands of dollars in bond sale expense to the City are involved. I believe the public interest requires a full investigation of this matter.

Sincerely,

Richard Planavsky

Richard Planavsky, Commissioner
of Administration and Finance

RP:dmc

Attachment

96 JUL 18 P 5: 29
96 JUL 18 P 5: 13

Whelan Used City-Tied Bank To Raise Funds

By GEORGE BORRELLI

News Political Reporter

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But Whelan insisted there was "no conflict of interest, nothing improper" in the role played by the bank, which serves as financial adviser to Buffalo in the sale of bonds and revenue notes.

However, Richard Planavsky, commissioner of administration and finance in the administration of Mayor Griffin, disagreed.

Planavsky, who unsuccessfully challenged Whelan in the Democratic primary for city comptroller in 1983, said the bank's role in the fund-raiser poses "serious questions of propriety," since the power to hire the bank as financial adviser to the city rests solely with Whelan.

He noted that Whelan recently recommended the creation of the Ethics in Government and Elections Committee of Erie County to enforce a code of ethics for all elected officials in the county.

"If the committee is formed, I think it would be appropriate for the panel to look into this kind of activity," said Planavsky of the Whelan fund-raiser.

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The party netted about \$8,000, according to Whelan, whose political options for 1987 include running for re-election or for Erie County executive.

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Whelan said the service was provided by the bank as a courtesy and would be reported on his financial disclosure statement as an "in-kind contribution" valued at about \$150.

"The bank had no role of any consequence," asserted Whelan, who said three employees of the bank attended his fund-raiser on a combined contribution of \$500.

Whelan said he has been in the forefront of efforts to reform election campaign laws, especially in the area of expenditures, which he wants curtailed, and in the amount of contributions, which he wants limited to \$1,000 from individuals and \$2,000 from corporations.

The comptroller said he gives no credence to Planavsky's suggestions of a possible conflict, asserting:

"Mr. Planavsky doesn't have the facts and is re-living the defeat he suffered three years ago."

Department of Administration and Finance

203 CITY HALL

BUFFALO, NEW YORK 14202



Ms. Joan D. Aikens
Chairman
Federal Election Commission
Washington, D.C. 20463

5040522414

26 JUL 86 4:11 PM



86040622415



FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 2248

Date Filmed 12/19/86 Camera No. --- 2

Cameraman AS



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

2/13/87

THE FOLLOWING MATERIAL IS BEING ADDED TO THE
PUBLIC FILE OF CLOSED MUR 3345.

97017341249

EDWARD C. COSGROVE

ATTORNEY AT LAW

SUITE 1000 MAIN-SENECA BUILDING

237 MAIN STREET

BUFFALO, NEW YORK 14203

716-854-2211

EDWARD C. COSGROVE

JOHN P. FREEDENBERG

OF COUNSEL

JUDITH BLAKE MANZELLA

EUGENE P. O'CONNOR

October 16, 1986

Charles N. Steele, Esq.
Lawrence M. Noble, Esq.
Federal Election Commission
Washington, D.C. 20463

Re: MUR 2248

Gentlemen:

I have been retained by Robert E. Whelan, Comptroller of the City of Buffalo and a Respondent in the above-referenced Matter Under Review, to prepare a response on his behalf to the petitioner's complaint herein. The Statement of Designation of Counsel is enclosed herewith.

As set forth in the response of Davis, Polk & Wardwell, attorneys for respondent Morgan Guaranty Trust Company of New York, dated October 14, 1986, petitioner's complaint is jurisdictionally deficient.

Petitioner alleges an "apparent violation" of 2 U.S.C. §441 (b) and other applicable provisions. An examination of this statute reveals that its applicability is limited to, and thus this Commission's jurisdiction is presumably limited to, contributions made by any national bank, and contributions made by any corporation in connection with presidential or congressional elections.

As the aforementioned response of Davis, Polk & Wardwell clearly demonstrates, Morgan Guaranty Trust Company of New York is not a national bank, and thus it is not strictly forbidden from making political contributions.

Furthermore, respondent Robert E. Whelan is not a candidate for any of the federal offices set forth in the applicable statute.

Even if the complaint herein were not jurisdictionally deficient, its underlying "facts" give rise to no cause for controversy.

RECEIVED AT THE REC
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OCT 17 1986
10:25

6 OCT 21 PM 4:22

670400420

Charles N. Steele, Esq.
Lawrence M. Noble, Esq.
Page 2
October 16, 1986

Morgan Guaranty was incorrectly designated as a contributor of services on the Financial Disclosure Statement of "Friends of Bob Whelan." In actuality, one or two individuals employed by Morgan Guaranty contributed their personal secretarial and clerical services valued at \$150.00.

For all of the above reasons, no action by the Commission is warranted with respect to the subject complaint. Thank you for your attention to this matter.

Yours truly,


EDWARD C. COSGROVE

ECC/jmp
Enclosure

87040642251

STATEMENT OF DESIGNATION OF COUNSEL

NR 2248

NAME OF COUNSEL: EDWARD C. COSGROVE, ESQ.

ADDRESS: Suite 1000, Main-Seneca Building
237 Main St., Buffalo, NY 14203

TELEPHONE: (716) 854-2211

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.

October 16, 1986

Date


Signature

RESPONDENT'S NAME: ROBERT E. WHELAN

ADDRESS: 1200 City Hall
Buffalo, NY 14202

HOME PHONE: 876-8952

BUSINESS PHONE: 855-5255

37117542252