



FEDERAL ELECTION COMMISSION

1325 K STREET NW
WASHINGTON, D.C. 20463

THIS IS THE END OF TMR # 1151

Date Filmed 10/30/80 Camera No. --- 2

Cameraman SPC



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 8, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Inner City Broadcasting
Corporation Operating Account
801 Second Avenue
New York, New York 10017

Re: MUR 1151

Dear Sirs:

On April 7, 1980, the Commission notified you of a reason to believe determination that the Inner City Broadcasting Corporation violated 2 U.S.C. § 441b(a) by making a prohibited contribution to the Committee to Re-Elect Congressman Charles B. Rangel. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file regarding this matter. This matter will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The Commission reminds you that making such contributions is in violation of 2 U.S.C. § 441b(a) and you should take immediate steps to insure that this activity does not occur in the future. If you have any questions, please direct them to Carolyn Weeder at (202)523-4529.

Sincerely,

A handwritten signature in dark ink, appearing to read "Charles N. Steele", is written over the typed name.

Charles N. Steele
General Counsel

3004022303

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Inner City Broadcasting
Corporation Operating Account
801 Second Avenue
New York, New York 10017

Re: MUR 1151

Dear Sirs:

On April 7, 1980, the Commission notified you of a reason to believe determination that the Inner City Broadcasting Corporation violated 2 U.S.C. § 441b(a) by making a prohibited contribution to the Committee to Re-elect Congressman Charles B. Rangel. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file regarding this matter. This matter will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The Commission reminds you that making such contributions is in violation of 2 U.S.C. § 441b(a) and you should take immediate steps to insure that this activity does not occur in the future. If you have any questions, please direct them to Carolyn Weeder at (202)523-4529.

Sincerely,

Charles N. Steele
General Counsel



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 8, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Richard A. Brown, Treasurer
Committee to Re-Elect
Congressman Charles B. Rangel
2030 Allen Place, N.W.
Washington, D.C. 20009

Re: MUR 1151

Dear Mr. Brown:

On January 29, 1979, the Commission notified you of a reason to believe determination that your Committee violated § 441b(a) of the Federal Election Campaign Act of 1971, as amended (the "Act"), by accepting a corporate contribution from the Inner City Broadcasting Corporation. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file regarding this matter. This matter will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The Commission reminds you that accepting contributions from corporations is a violation of 2 U.S.C. § 441b(a) and you should take immediate steps to insure that this activity does not occur in the future. If you have any questions, please direct them to Carolyn Weeder at (202)523-4529.

Sincerely,

A handwritten signature in cursive script, appearing to read "Charles N. Steele".

Charles N. Steele
General Counsel

3004022305

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Richard A. Brown, Treasurer
Committee to Re-Elect
Congressman Charles B. Rangel
2030 Allen Place, N.W.
Washington, D.C. 20009


Re: MUR 1151

Dear Mr. Brown:

On January 29, 1979, the Commission notified you of a reason to believe determination that your Committee violated § 441b(a) of the Federal Election Campaign Act of 1971, as amended (the "Act"), by accepting a corporate contribution from the Inner City Broadcasting Corporation. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file regarding this matter. This matter will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The Commission reminds you that accepting contributions from corporations is a violation of 2 U.S.C. § 441b(a) and you should take immediate steps to insure that this activity does not occur in the future. If you have any questions, please direct them to Carolyn Weeder at (202)523-4529.

Sincerely,


Charles N. Steele
General Counsel

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Committee to Re-Elect Congressman) MUR 1151
Charles B. Rangel)
Inner City Broadcasting Corporation)

CERTIFICATION

I, Marjorie W. Emmons, Recording Secretary for the Federal Election Commission's Executive Session on October 7, 1980, do hereby certify that the Commission decided by a vote of 5-1 to take the following actions in MUR 1151:

1. Take no further action with regard to the Committee to Re-Elect Congressman Charles B. Rangel's violation of 2 U.S.C. §441b(a) by accepting a corporate contribution.
2. Take no further action with regard to the Inner City Broadcasting Corporation's violation of 2 U.S.C. §441b(a) by making a corporate contribution.
3. Approve and send the letters to Richard A. Brown, Treasurer of the Committee to Re-Elect Congressman Charles B. Rangel and to the Inner City Broadcasting Corporation, as submitted with the General Counsel's September 24, 1980 report in this matter.
4. Close the file.

Commissioners Aikens, Friedersdorf, Harris, McGarry, and Tiernan voted affirmatively for the decision; Commissioner Reiche dissented.

Attest:

10/7/80
Date

Marjorie W. Emmons
Marjorie W. Emmons
Secretary to the Commission



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS/MARGARET CHANEY *mw*

DATE: OCTOBER 1, 1980

SUBJECT: OBJECTION - MUR 1151 - General Counsel's
Report dated 9-24-80; Signed 9-29-80.
Received in OCS 9-30-80, 11:25

The above-named document was circulated on a 48
hour vote basis at 4:00, September 30, 1980.

Commissioner Reiche submitted an objection and comment
at 9:58, October 1, 1980.

This matter will be placed on the Executive Session
Agenda for Tuesday, October 7, 1980.

A copy of Commissioner Reiche vote sheet is attached.

ATTACHMENT:
Copy of Vote Sheet



FEDERAL ELECTION COMMISSION 58

1325 K STREET N.W.
WASHINGTON, D.C. 20463Date and Time Transmitted: TUESDAY, 9-30-80
4:00Commissioner FRIEDERSDORF, AIKENS, TIERNAN, McGARRY, REICHE, HARRISRETURN TO OFFICE OF COMMISSION SECRETARY BY: THURSDAY, OCTOBER 2, 1980
4:00MUR No. 1151 - General Counsel's Report dated 9-24-80; Signed
9-29-80

- () ☒ approve the recommendation
(☒) object to the recommendation

COMMENTS:

I cannot in good faith accept
the respondent's argument.Date: 10/1/80 Signature: Frank P. Reiche

A DEFINITE VOTE IS REQUIRED AND ALL SHEETS SIGNED AND DATED.
PLEASE RETURN ONLY THE VOTE SHEETS TO THE OFFICE OF THE
COMMISSION SECRETARY NO LATER THAN THE DATE AND TIME SHOWN
ABOVE.



~~September~~ 30, 1980

MEMORANDUM TO: Marjorie W. Emmons
FROM : Jane Colgrove
SUBJECT: MUR 1151

Please have the attached General Counsel's Report on MUR 1151 distributed ~~to~~ the Commission on a 48 hour tally basis.

Thank you.

3004022310

BEFORE THE FEDERAL ELECTION COMMISSION

September 24, 1980

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

80 SEP 30 11: 25

In the Matter of)
)
Committee to Re-Elect Congressman) MUR 1151
Charles B. Rangel)
Inner City Broadcasting Corporation)

GENERAL COUNSEL'S REPORT

I. Background

On April 7, 1980, the Commission found reason to believe that the Committee to Re-Elect Congressman Charles B. Rangel (the "Committee"), violated 2 U.S.C. § 441b(a) by accepting an unlawful contribution for \$1,000 from the Inner City Broadcasting Corporation ("ICBC") on September 15, 1978. Accordingly, the Commission also found reason to believe that the ICBC violated 2 U.S.C. § 441b(a) by making an unlawful contribution in connection with federal elections. The General Counsel's office sent a brief to each respondent on June 2, 1980.

II. Legal Analysis

In response to the General Counsel's Brief, the Committee submitted a letter which restates its position that an employee accepted the contribution without realizing it was from a prohibited source.^{*/} Thus, the Committee contends that the acceptance was merely a clerical error, and that it in no way intended to violate any provisions of the FECA.

^{*/} The Committee submitted a letter in response to the RTB notification on April 28, 1980 which explains the same circumstance.

3004022312
Inasmuch as a) the violation occurred two years ago; b) the Committee refunded the unlawful contribution on February 5, 1979; c) the Committee promptly made the refund within a week after being notified by RAD; d) the Committee submitted a copy of the check for the refund; and d) the Committee properly reported the contribution upon both its receipt and its refund, the Office of General Counsel recommends that the Commission take no further action with regard to the Committee's violation of 2 U.S.C. § 441b(a) by accepting a corporate contribution, as well as with regard to the ICBC's violation of 2 U.S.C. § 441b(a) by making a corporate contribution.

Accordingly, this office also recommends approving and sending the attached letters to each respondent, as well as closing the file in this matter.


III. Recommendations

1. Take no further action with regard to the Committee to Re-Elect Congressman Charles E. Rangel's violation of 2 U.S.C. § 441b(a) by accepting a corporate contribution.

2. Take no further action with regard to the Inner City Broadcasting Corporation's violation of 2 U.S.C. § 441b(a) by making a corporate contribution.

3. Approve and send the attached letters to Richard A. Brown, Treasurer of the Committee to Re-Elect Congressman Charles B. Rangel and to the Inner City Broadcasting Corporation.
4. Close the file

29 Sept 1980
Date



Charles N. Steele
General Counsel

Attachments

1. Respondent's Submission
2. Letter to Richard A. Brown, Treasurer
Committee to Re-Elect Congressman Charles B. Rangel
3. Letter to Inner City Broadcasting Corporation

80010222313

Weeder

Rangel For Congress Committee

2030 Allen Place, N.W.
Washington, D.C. 20009

2/18/80

FEC

... 12

July 9, 1980

Office of the General Counsel
Federal Election Commission
1325 "K" Street, NW
Washington, D.C. 20463

Attention: Carolyn Weeder

Re: MUR 1151 in connection with the acceptance of a
contribution by the Rangel for Congress Committee
of a check from the Inner City Broadcasting Corporation

Gentlemen:

30001022314

That check was inadvertently accepted by a secretary. It is easy to see how she could have overlooked the check since it was from an old friend of the Congressman, Percy Sutton, and because ABC and NBC have conditioned one to think of Corporation as a proper name in a broadcast organization rather than the Inc. which is usually attached to a Corporation.

Every time we, or I am sure any other committee, runs a fund raiser, we receive a number of small corporate checks which we return. It would not be surprising if from time to time a clerical error of acceptance was made. It is hard to believe that it was the intent of the law to punish, even mildly, minor infractions of this sort.

This Committee has always attempted to follow the spirit and letter of the law. There was no attempt at subterfuge or avoidance -- no hint of malfeasance. The contribution was from an old friend with no lobbying involvement.

I am of course prepared to meet with the Commission at any time, but I fail to see how pursuing this matter any further can serve the public good. I find it difficult to believe that this kind of error is not a common one. I would think that the immediate compliance by our Committee would satisfy the law, the Commission and their need to ensure effective compliance.

I hope that you will reconsider the need for further action.

Sincerely,

Richard A. Brown

Richard A. Brown

Attachment 1



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Richard A. Brown, Treasurer
Committee to Re-Elect
Congressman Charles B. Rangel
2030 Allen Place, N.W.
Washington, D.C. 20009

Re: MUR 1151

Dear Mr. Brown:

On January 29, 1979, the Commission notified you of a reason to believe determination that your Committee violated § 441b(a) of the Federal Election Campaign Act of 1971, as amended (the "Act"), by accepting a corporate contribution from the Inner City Broadcasting Corporation. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file regarding this matter. This matter will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The Commission reminds you that accepting contributions from corporations is a violation of 2 U.S.C. § 441b(a) and you should take immediate steps to insure that this activity does not occur in the future. If you have any questions, please direct them to Carolyn Weeder at (202)523-4529.

Sincerely,

Charles N. Steele
General Counsel

Attachment 2



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Inner City Broadcasting
Corporation Operating Account
801 Second Avenue
New York, New York 10017

Re: MUR 1151

Dear Sirs:

On April 7, 1980, the Commission notified you of a reason to believe determination that the Inner City Broadcasting Corporation violated 2 U.S.C. § 441b(a) by making a prohibited contribution to the Committee to Re-Elect Congressman Charles B. Rangel. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file regarding this matter. This matter will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The Commission reminds you that making such contributions is in violation of 2 U.S.C. § 441b(a) and you should take immediate steps to insure that this activity does not occur in the future. If you have any questions, please direct them to Carolyn Weeder at (202)523-4529.

Sincerely,

Charles N. Steele
General Counsel

Attachment 3

300-
2317

11/11/81

Rangel For Congress Committee

2030 Allen Place, N.W.
Washington, D.C. 20009

12 23

Richard A. Brown
Treasurer

11/11/81

August 8, 1980

Charles Steele
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Dear Mr. Steele:


300-10221317

This Committee inadvertently accepted a contribution on June 10, 1980 from the Resource Planning and Development Ltd. not realizing said corporation was incorporated.

In becoming aware of this, we have issued a committee check on August 8, 1980 in the full amount of \$400 to them.

I am sending a copy of the letter which accompanied the returned check. If there are any necessary forms we need to fill out, please let us know.

Sincerely,



RICHARD A. BROWN
Treasurer

RAB:b
Enclosure

00 12 8 81 10 00

2

Rangel For Congress Committee

2030 Allen Place, N.W.
Washington, D.C. 20009

August 8, 1980

Richard A. Brown
Treasurer

Resource Planning & Development Ltd.
79 Madison Avenue
New York, New York 10016


Gentlemen:

I am writing concerning the June 10, 1980 contribution of \$400 from "Resource Planning & Development Ltd." to the Committee to Re-Elect Congressman Charles B. Rangel.

Title 2 - Section 441.B of the U.S. Code prohibits the receipt of contributions made from the treasuries of national banks, corporations and unions. However, contributions can be accepted from separate segregated funds or a political action committee established by corporations, unions or national banks.

The individual who received and recorded your check did not realize that Ltd. indicated corporation. Therefore, I am returning your contribution in the amount of \$400 and look forward to receiving a replacement check in compliance with the rules and regulations of the Federal Election Campaign Act.

Sincerely,


RICHARD A. BROWN
Treasurer

RAB:b
Enclosure

RANGEL FOR CONGRESS COMMITTEE
2030 Allen Place, N.W.
Washington, D.C. 20009





FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE *mwe*
FROM: MARJORIE W. EMMONS/MARGARET CHANEY *mc*
DATE: AUGUST 1, 1980
SUBJECT: MUR 1151 - Interim Investigative Report
dated 7-30-80; Signed 7-29-80; Received
in OCS 7-31-80, 11:42

3004022320

The above-named document was circulated to the
Commission on a 24 hour no-objection basis at 4:00,
July 31, 1980.

There were no objections to the Interim Investigative Report
at the time of the deadline.

July 31, 1980

MEMORANDUM TO: Marjorie W. Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 1151

Please have the attached Interim Invest Report
distributed to the Commission. Thank you.

3004022321

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

July 30, 1980

80 JUL 31 AM: 42

In the Matter of)
)
Committee to Re-Elect Congressman)
Charles B. Rangel)
Inner City Broadcasting Corporation)


MUR 1151

INTERIM INVESTIGATIVE REPORT #1

On April 7, 1980, the Commission found reason to believe that the Committee to Re-Elect Congressman Charles B. Rangel violated 2 U.S.C. § 441b(a) by accepting an unlawful contribution from the Inner City Broadcasting Corporation ("ICBC"). Accordingly, the Commission also found reason to believe that the ICBC violated 2 U.S.C. § 441b(a) by making an unlawful contribution in connection with federal elections.

As respondents did not submit any information which demonstrated that the Commission should take no further action, the General Counsel's Office sent a brief to each respondent on June 2, 1980. The Office of General Counsel is in the process of preparing a further report for the Commission's review.

29 July 1980
Date


Charles N. Steele
General Counsel

Rangel For Congress Committee

2030 Allen Place, N.W.
Washington, D.C. 20009

FEC
2186
12
Richard A. Brown
Treasurer
JUL 14 PM 2 45
HOUSE OF REPRESENTATIVES

July 9, 1980

Office of the General Counsel
Federal Election Commission
1325 "K" Street, NW
Washington, D.C. 20463

Attention: Carolyn Weeder

Re: MUR 1151 in connection with the acceptance of a
contribution by the Rangel for Congress Committee
of a check from the Inner City Broadcasting Corporation

Gentlemen:

300102223
That check was inadvertently accepted by a secretary. It is easy to see how she could have overlooked the check since it was from an old friend of the Congressman, Percy Sutton, and because ABC and NBC have conditioned one to think of Corporation as a proper name in a broadcast organization rather than the Inc. which is usually attached to a Corporation.

Every time we, or I am sure any other committee, runs a fund raiser, we receive a number of small corporate checks which we return. It would not be surprising if from time to time a clerical error of acceptance was made. It is hard to believe that it was the intent of the law to punish, even mildly, minor infractions of this sort.

This Committee has always attempted to follow the spirit and letter of the law. There was no attempt at subterfuge or avoidance -- no hint of malfeasance. The contribution was from an old friend with no lobbying involvement.

I am of course prepared to meet with the Commission at any time, but I fail to see how pursuing this matter any further can serve the public good. I find it difficult to believe that this kind of error is not a common one. I would think that the immediate compliance by our Committee would satisfy the law, the Commission and their need to ensure effective compliance.

I hope that you will reconsider the need for further action.

Sincerely,

Richard A. Brown

Richard A. Brown

Richard A. Brown, Treasurer
Rangel for Congress Committee
2030 Allen Place, N.W.
Washington, D.C. 20009



Office of the General Counsel
Federal Election Commission
1325 "K" Street, NW
Washington, D.C. 20463

Attention: Carolyn Weeder

RECEIVED
FEDERAL ELECTION COMMISSION
JUL 14 PM 2:45
OFFICE OF THE CLERK
U.S. HOUSE OF REPRESENTATIVES

3



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 2, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Richard A. Brown, Treasurer
Committee to Re-Elect Congressman
Charles B. Rangel
2030 Allen Place, N.W.
Washington, D.C. 20009

Re: MUR 1151

Dear Mr. Brown:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on April 4, 1980, found reason to believe that your committee violated 2 U.S.C. § 441b(a), and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find probable cause to believe that a violation has occurred.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of General Counsel.) The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of probable cause to believe a violation has occurred.

A finding of probable cause to believe requires that the Office of General Counsel attempt for a period of not less than thirty, but not more than ninety days to settle this matter

Richard A. Brown, Treasurer
Page Two

through a conciliation agreement. This does not preclude settlement of this matter through informal conciliation prior to a finding of probable cause to believe, if you so desire.

Should you have any questions, please contact Carolyn Weeder at (202) 523-4529.

Sincerely,

Charles N. Steele
Charles N. Steele
General Counsel

Enclosure
Brief

PS Form 3811, Aug. 1978

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

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

2. ARTICLE ADDRESSED TO:
Richard A. Brown, Treasurer
Committee to Re-Elect Congressman
Charles B. Rangel, Washington, D.C.

3. ARTICLE DESCRIPTION:
REGISTERED NO. _____ CERTIFIED NO. 945024 INSURED NO. _____
(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
Mr. Richard A. Brown

4. DATE OF DELIVERY
6-4-80

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER REASON _____
6-1-80

CLERK'S INITIALS

RECEIVED - 1511

GPO: 1978-272-382



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 2, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Inner City Broadcasting Corporation
Operating Account
801 Second Avenue
New York, New York 10017

re: MUR 1151

Dear Sirs:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on March 20, 1980, found reason to believe that the Inner City Broadcasting Corporation violated 2 U.S.C. § 441b(a), and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of General Counsel is prepared to recommend that the Commission find probable cause to believe that a violation has occurred.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 Copies) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of General Counsel). The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of probable cause to believe a violation has occurred.

A finding of probable cause to believe requires that the Office of General Counsel attempt for a period of not less than thirty, but not more than ninety days to settle this matter through a conciliation agreement. This does not preclude

Inner City Broadcasting Corporation
Page Two

settlement of this matter through informal conciliation prior to a finding of probable cause to believe, if you so desire.

Should you have any questions, please contact Carolyn Weeder at (202)523-4529.

Sincerely,

Charles N. Steele
Charles N. Steele
General Counsel

Enclosure

Brief

PS Form 3817, Aug. 1978

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

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

2. ARTICLE ADDRESSED TO:
Inner City Broadcasting Corporation
Operating Account
801 Second Avenue
New York, N.Y. 10017

3. ARTICLE DESCRIPTION:
REGISTERED NO. CERTIFIED NO. INSURED NO.
945022

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
Alexander M. ...

4. DATE OF DELIVERY: 6/8 POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

WEEDER - 1151

U.S. GPO: 1978-272-342

June 2, 1980

MEMORANDUM TO: Marjorie W. Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 1151

Please have the 2 attached Memos and briefs distributed to the Commission on an informational basis. Thank you.

3074022339



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
OFFICE OF THE
COMMISSIONER
JUN 2 P 2: 54

June 2, 1980

MEMORANDUM

TO: The Commission

FROM: Charles N. Steele
General Counsel *CS*

SUBJECT: MUR 1151 - Committee to Re-Elect Congressman Charles B. Rangel

Attached for the Commission's review is a brief stating the position of the General Counsel on the legal and factual issues of the above-captioned matter. A copy of this brief and a letter notifying the Respondent of the General Counsel's intent to recommend to the Commission a finding of probable cause to believe was mailed on June 2, 1980. Following receipt of the Respondent's reply to this notice, this Office will make a further report to the Commission.

Attachments

1. Brief
2. Letter to Respondent

BEFORE THE FEDERAL ELECTION COMMISSION
May 29, 1980

In the Matter of)

Committee to Re-Elect Congressman)
Charles B. Rangel)

MUR 1151

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

Reports filed by the Committee to Re-Elect Congressman Charles B. Rangel ("the Committee") disclosed receipt of a contribution of \$1,000 from the Inner City Broadcasting Corporation on September 15, 1978 in violation of 2 U.S.C. § 441b(a). On January 29, 1979, the Commission advised the Committee of the apparent violation of 2 U.S.C. § 441b(a) by accepting a contribution prohibited by that section. The Committee refunded the unlawful contribution on February 5, 1980. The Commission notified the Committee of a reason to believe finding on April 7, 1980. The Committee responded to the notification on April 29, 1980.

II. Legal Analysis

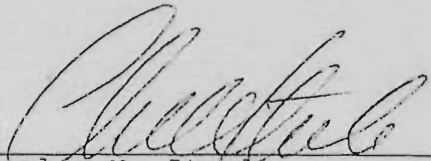
2 U.S.C. § 441b(a) prohibits political committees from accepting contributions from corporations. The Committee admits in its response as well as in an earlier letter, that it accepted in error a contribution of \$1,000 from the Inner City Broadcasting Corporation (incorporated on January 28, 1977, in New York State) on September 15, 1978. The Committee refunded the unlawful contribution within one week after notification by the Reports Analysis Division,

however the Committee violated 2 U.S.C. § 441b(a) upon its acceptance of the corporate contribution.

III. General Counsel's Recommendation

Based upon the foregoing facts, the Office of General Counsel recommends finding probable cause to believe that the Committee to Re-Elect Congressman Charles B. Rangel violated 2 U.S.C. § 441b(a) by accepting a corporate contribution.

30 May 1980
Date


Charles N. Steele
General Counsel

9001022132



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 2, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Richard A. Brown, Treasurer
Committee to Re-Elect Congressman
Charles B. Rangel
2030 Allen Place, N.W.
Washington, D.C. 20009

Re: MUR 1151

Dear Mr. Brown:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on April 4, 1980, found reason to believe that your committee violated 2 U.S.C. § 441b(a), and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find probable cause to believe that a violation has occurred.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of General Counsel.) The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of probable cause to believe a violation has occurred.


A finding of probable cause to believe requires that the Office of General Counsel attempt for a period of not less than thirty, but not more than ninety days to settle this matter

Richard A. Brown, Treasurer
Page Two

through a conciliation agreement. This does not preclude settlement of this matter through informal conciliation prior to a finding of probable cause to believe, if you so desire.

Should you have any questions, please contact Carolyn Weeder at (202) 523-4529.

Sincerely,



Charles N. Steele
General Counsel

Enclosure
Brief

3004022334



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 2, 1980

MEMORANDUM

TO: The Commission

FROM: Charles N. Steele *CS*
General Counsel

SUBJECT: MUR 1151 - Inner City Broadcasting Corporation

Attached for the Commission's review is a brief stating the position of the General Counsel on the legal and factual issues of the above-captioned matter. A copy of this brief and a letter notifying the respondent of the General Counsel's intent to recommend to the Commission a finding of probable cause to believe was mailed on June 2, 1980. Following receipt of the Respondent's reply to this notice, this Office will make a further report to the Commission.

Attachments

1. Brief
2. Letter to Respondent

30019212333

BEFORE THE FEDERAL ELECTION COMMISSION

May 22, 1980

In the Matter of)
)
Inner City Broadcasting Corporation) MUR 1151

GENERAL COUNSEL'S BRIEF

I. Statement of Case

Reports filed by the Committee to Re-Elect Congressman Charles B. Rangel (the "Committee") disclosed that the Inner City Broadcasting Corporation (the "ICBC") made a contribution of \$1,000 to the Committee on September 15, 1978 in violation of 2 U.S.C. § 441b(a).

On April 7, 1980 the Commission found reason to believe that the ICBC violated the Act and notified the respondent accordingly. To date, respondent has not submitted any information which demonstrates that the Commission should take no further action.


II. Legal Analysis

2 U.S.C. § 441b(a) prohibits corporations from making contributions in connection with federal elections. The ICBC filed papers of incorporation with the Secretary of State's Office of New York on January 28, 1977. On September 15, 1978, the ICBC made a \$1,000 contribution to the Committee. The ICBC received a refund from the Committee on February 5, 1979. Although the Committee returned the money, the ICBC violated 2 U.S.C. § 441b(a) at the time it made the contribution.

III. General Counsel's Recommendation

Based upon the foregoing facts, the Office of General Counsel recommends finding probable cause to believe that the Inner City Broadcasting Corporation violated 2 U.S.C. § 441b(a) by making a corporate contribution in connection with federal elections.

30 May 1980
DATE


CHARLES N. STEELE
GENERAL COUNSEL

3004022337



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

June 2, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Inner City Broadcasting Corporation
Operating Account
801 Second Avenue
New York, New York 10017

re: MUR 1151

Dear Sirs:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on March 20, 1980, found reason to believe that the Inner City Broadcasting Corporation violated 2 U.S.C. § 441b(a), and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of General Counsel is prepared to recommend that the Commission find probable cause to believe that a violation has occurred.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of General Counsel). The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of probable cause to believe a violation has occurred.

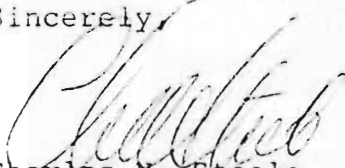
A finding of probable cause to believe requires that the Office of General Counsel attempt for a period of not less than thirty, but not more than ninety days to settle this matter through a conciliation agreement. This does not preclude

Inner City Broadcasting Corporation
Page Two

settlement of this matter through informal conciliation prior to a finding of probable cause to believe, if you so desire.

Should you have any questions, please contact Carolyn Weeder at (202)523-4529.

Sincerely,



Charles N. Steele
General Counsel

Enclosure

Brief

8004022337

RECEIVED
1182
80 APR 28 AM 11:47

Committee to Re-elect Congressman
Charles B. Rangel
2030 Allen Place, NW
Washington, D.C. 20009
April 25, 1980

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

Attention: Carolyn Weeder

Gentlemen:

This is in response to your letter referring to the acceptance of a corporate contribution by the Committee to Re-elect Congressman Charles B. Rangel.

The Committee to Re-elect Congressman Charles B. Rangel did accept in error a contribution from the Inner City Broadcasting Corporation on September 15th, 1978. When we received notification from the Federal Election Commission that we had acted erroneously in accepting this contribution we immediately returned the contribution on February 5th, 1979. The contribution was received at the time of a general fund raiser and the secretary who deposited the various checks received at that time failed to notice that she was recording a corporate contribution. There was not then or ever any attempt on the part of this committee to violate the law by accepting corporate contributions.

We believe we have done all that we possibly can to correct the violation and to see to it that such violation does not recur.

I would be glad to meet with any one you designate to discuss this matter further.

Sincerely,

Richard A. Brown

Richard A. Brown
Treasurer

RAB:p

20:30 P 3:02

RECEIVED
GENERAL
APR 28 1980



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 7, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Richard A. Brown, Treasurer
Committee to Re-Elect Congressman
Charles B. Rangel
2030 Allen Place, N.W.
Washington, D.C. 20009

Re: MUR 1151

Dear Mr. Brown:

The Federal Election Commission notified you in a surface violation letter dated January 29, 1979, that your committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended (the "Act").

Upon further review of the information available to the Commission, the Commission determined on April 4, 1980, that there is reason to believe that your committee violated 2 U.S.C. § 441b(a). A report on the Commission's finding is attached for your information. You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

In the absence of any additional information which demonstrates that no further action should be taken against your committee, the Commission may find probable cause to believe that a violation has occurred, and proceed with formal conciliation. Of course, this does not preclude the settlement of this matter through informal conciliation prior to a finding of probable cause to believe if you so desire.

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.

Letter to: Richard A. Brown
Page: 2

If you have any questions, please contact Carolyn Weeder,
the staff member assigned to this matter at (202)523-4529.

Sincerely,

Robert O. Tiernan
ROBERT O. TIERNAN
Chairman

Enclosures (2)

Reason to Believe Notification
Procedures

3004022343

● SENDER Complete items 1, 2, and 3 Add your address in the reverse		RETURN TO space on reverse	
1. The following service is requested (check one) <input type="checkbox"/> Show to whom and date delivered <input type="checkbox"/> Show to whom, date, and address of delivery <input type="checkbox"/> RESTRICTED DELIVERY <input type="checkbox"/> Show to whom and date delivered <input type="checkbox"/> RESTRICTED DELIVERY <input type="checkbox"/> Show to whom, date, and address of delivery \$ (CONSULT POSTMASTER FOR FEES)			
2. ARTICLE ADDRESSED TO: 2030 Allen Rd. NW Wash D.C. 20009		ARTICLE DESCRIPTION REGISTERED NO. 744395 CERTIFIED NO. 120 INSURED NO.	
(Always obtain signature of addressee or agent)			
I have received the article described above. SIGNATURE <input type="checkbox"/> Addressee <input type="checkbox"/> Authorized agent R. A. Brown			
4. DATE OF DELIVERY 7.10.82		POSTMARK APR 10 1982 CLERK'S INITIALS	
5. ADDRESS (Complete only if requested)			
6. UNABLE TO DELIVER BECAUSE:			

Form 3811, Apr. 1977 RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

1977-0-249-586
Mr 1151 C Weeder

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Richard A. Brown, Treasurer
Committee to Re-Elect Congressman
Charles B. Rangel
2030 Allen Place, N.W.
Washington, D.C. 20009

Re: MUR 1151

Dear Mr. Brown:

The Federal Election Commission notified you in a surface violation letter dated January 29, 1979, that your committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended (the "Act").

Upon further review of the information available to the Commission, the Commission determined on April 4, 1980, that there is reason to believe that your committee violated 2 U.S.C. § 441b(a). A report on the Commission's finding is attached for your information. You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

In the absence of any additional information which demonstrates that no further action should be taken against your committee, the Commission may find probable cause to believe that a violation has occurred, and proceed with formal conciliation. Of course, this does not preclude the settlement of this matter through informal conciliation prior to a finding of probable cause to believe if you so desire.

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.

CEW

Letter to: Richard A. Brown
Page: 2

If you have any questions, please contact Carolyn Weeder,
the staff member assigned to this matter at (202)523-4529.

Sincerely,

Enclosures (2)

Reason to Believe Notification

Procedures

3004022345

FEDERAL ELECTION COMMISSION

NOTIFICATION OF REASON TO BELIEVE FINDING

DATE:

APR 4 1980

MUR NO: 1151

STAFF MEMBER(S) & TEL. NO.

Carolyn Weeder

(202)523-4529

RESPONDENT: Committee to Re-Elect
Congressman Charles B. Rangel

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

BACKGROUND

On January 7, 1980, the Reports Analysis Division (RAD) referred to the Office of General Counsel the matter in which the Committee to Re-Elect Congressman Charles B. Rangel (the "Committee") may have violated 2 U.S.C. § 441b(a) by accepting a corporate contribution.

FACTUAL BASIS AND LEGAL ANALYSIS

During the course of normal review, RAD disclosed that the Committee accepted a \$1,000 corporate contribution from the Inner City Broadcasting Corporation on September 15, 1978. A surface violation letter was sent to the Committee on January 29, 1979 advising it of the possible 2 U.S.C. § 441b(a) violation. The Committee subsequently refunded the contribution to the Inner City Broadcasting Corporation on February 5, 1979.

2 U.S.C. § 441b(a) prohibits any political committee from accepting any contributions from corporations. The Committee accepted the \$1,000 contribution from the Inner City Broadcasting Corporation whose name clearly reveals its corporate status.

Based on the foregoing analysis, the Federal Election Commission has found reason to believe that the Committee to Re-Elect Congressman Charles B. Rangel violated 2 U.S.C. § 441b(a) by accepting a corporate contribution.



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 7, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Inner City Broadcasting Corporation
Operating Account
801 Second Avenue
New York, New York 10017

Re: MUR 1151

Dear Sirs:

In the normal course of its supervisory responsibilities, the Federal Election Commission has found reason to believe that the Inner City Broadcasting Corporation has violated section 441b(a) of the Federal Election Campaign Act of 1971, as amended (the "Act").

A report on the Commission's finding is enclosed for your information. You may submit any factual or legal materials which you believe to be relevant to the Commission's analysis of this matter.

In the absence of any information which demonstrates that no further action should be taken against you, the Commission may find probable cause to believe that a violation has occurred, and proceed with formal conciliation. Of course, this does not preclude the settlement of this matter through informal conciliation prior to a finding of probable cause to believe if you so desire. A brief description of the Commission's procedures for handling possible violations is enclosed.

If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications for the Commission.

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

Letter to: Inner City Broadcasting Corporation
Operating Account
Page: 2

If you have any questions, please contact Carolyn Weeder, the staff member assigned to this matter at (202)523-4529.

Sincerely,

Robert O. Tiernan

ROBERT O. TIERNAN
Chairman

Enclosures (2)

Reason to Believe Notification
Procedures

30040222319

● SENDER: Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.	
1. The following service is requested (check one). <input checked="" type="checkbox"/> Show to whom and date delivered..... 154 <input type="checkbox"/> Show to whom, date, & address of delivery.. 354 <input type="checkbox"/> RESTRICTED DELIVERY. <input type="checkbox"/> Show to whom and date delivered..... 654 <input type="checkbox"/> RESTRICTED DELIVERY. <input type="checkbox"/> Show to whom, date, and address of delivery 854	
2. ARTICLE ADDRESSED TO: <i>Inner City Broadcasting Corporation</i> <i>801 - Second Avenue</i> <i>New York, New York 10017</i>	
3. ARTICLE DESCRIPTION: REGISTERED NO. <i>6541347</i>	INSURED NO.
(Always obtain signature of addressee or agent) I have received the article described above. SIGNATURE <input type="checkbox"/> Addressee <input type="checkbox"/> Authorized agent <i>[Signature]</i>	
4. DATE OF DELIVERY <i>4-30-80</i>	POSTMARK
5. ADDRESS (Complete only if requested)	
6. UNABLE TO DELIVER BECAUSE: CLIENT'S INITIALS	

PS Form 3811, Mar. 1976

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

MW 1151 weeder

9001022319

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Inner City Broadcasting Corporation
Operating Account
801 Second Avenue
New York, New York 10017

Re: MUR1151

Dear Sirs:

In the normal course of its supervisory responsibilities, the Federal Election Commission has found reason to believe that the Inner City Broadcasting Corporation has violated section 441b(a) of the Federal Election Campaign Act of 1971, as amended (the "Act").

A report on the Commission's finding is enclosed for your information. You may submit any factual or legal materials which you believe to be relevant to the Commission's analysis of this matter.

In the absence of any information which demonstrates that no further action should be taken against you, the Commission may find probable cause to believe that a violation has occurred, and proceed with formal conciliation. Of course, this does not preclude the settlement of this matter through informal conciliation prior to a finding of probable cause to believe if you so desire. A brief description of the Commission's procedures for handling possible violations is enclosed.

If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications for the Commission.

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

W

Letter to: Inner City Broadcasting Corporation
Operating Account

Page: 2

If you have any questions, please contact Carolyn
Weeder, the staff member assigned to this matter at
(202)523-4529.

Sincerely,

Enclosures (2)

Reason to Believe Notification
Procedures

3001722330

FEDERAL ELECTION COMMISSION

NOTIFICATION OF REASON TO BELIEVE FINDING

DATE: APR 4 1980

MUR NO. 1151
STAFF MEMBER(S) & TEL. NO.
Carolyn Weeder
(202)523-4529

RESPONDENT: Inner City Broadcasting
Corporation

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

BACKGROUND

On January 7, 1980, the Reports Analysis Division (RAD) referred to the Office of General Counsel the matter in which the Inner City Broadcasting Corporation may have violated 2 U.S.C. § 441b(a) by making a corporate contribution to the Committee to Re-Elect Congressman Charles B. Rangel.

FACTUAL BASIS AND LEGAL ANALYSIS

During the course of normal review, RAD disclosed that the Inner City Broadcasting Corporation (incorporated in 1977) made a \$1,000 contribution to the Committee to Re-Elect Congressman Charles B. Rangel (the "Committee") on September 15, 1978. The Committee refunded the unlawful contribution to the Inner City Broadcasting Corporation on February 5, 1979 upon notification by RAD of the violation.

2 U.S.C. § 441b(a) prohibits corporations from making contributions to a political committee in connection with federal election activities. In that the Inner City Broadcasting Corporation made a \$1,000 contribution to the principal campaign committee of a federal candidate, the Federal Election Commission has found reason to believe that the Inner City Broadcasting Corporation violated 2 U.S.C. § 441b(a).

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1151
Committee to Re-Elect)
Congressman Charles B. Rangel)
)
Inner City Broadcasting Corporation)
Operating Account)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on April 4, 1980, the Commission decided by a vote of 6-0 to take the following actions regarding MUR 1151:

1. Find REASON TO BELIEVE that the Committee to Re-Elect Congressman Charles B. Rangel violated 2 U.S.C. § 441b(a) by accepting an unlawful contribution.
2. Approve and send the letter and notification of a reason to believe finding to the Committee to Re-Elect Congressman Charles B. Rangel, (Attachment 2, General Counsel's Report dated March 31, 1980).
3. Approve and send the letter and notification of a reason to believe finding to the Inner City Broadcasting Corporation, (Attachment 1 to the above-named report).

Voting for this determination were Commissioners Aikens, Friedersdorf, Harris, McGarry, Reiche, and Tiernan.

Attest:

4/7/80

Date

Marjorie W. Emmons
Marjorie W. Emmons
Secretary to the Commission

Received in Office of the Commission Secretary: 4-2-80, 4:37
Circulated on 48 hour vote basis: 4-3-80, 11:00

April 2, 1980

MEMORANDUM TO: Marjorie W. Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 1151

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

3004022333

BEFORE THE FEDERAL ELECTION COMMISSION
March 31, 1980

In the Matter of)
)
Committee to Re-Elect) MUR 1151
Congressman Charles B. Rangel)
)
Inner City Broadcasting Corporation)
Operating Account)

GENERAL COUNSEL'S REPORT

On March 20, 1980 the Commission voted to find reason to believe that the Inner City Broadcasting Corporation violated 2 U.S.C. § 441b(a) by making an unlawful contribution to the Committee to Re-Elect Congressman Charles B. Rangel (the "Committee") with regard to MUR 1151.

However, as the Commission has not made a reason to believe finding against the Committee, the Office of General Counsel recommends that the Commission find reason to believe that the Committee violated 2 U.S.C. § 441b by accepting a corporate contribution. We also recommend that the attached letters and notifications to the Inner City Broadcasting Corporation and to the Committee be approved and sent.

RECOMMENDATIONS

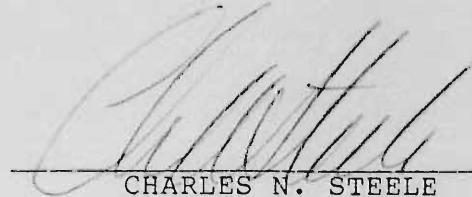
1. Find reason to believe that the Committee to Re-Elect Congressman Charles B. Rangel violated 2 U.S.C. § 441b(a) by accepting an unlawful contribution.
2. Approve and send the letter and notification of a reason to believe finding to the Committee to Re-Elect Congressman Charles B. Rangel.

3. Approve and send the letter and notification of a reason to believe finding to the Inner City Broadcasting Corporation.

Attachments:

1. Letter and notification of reason to believe finding to the Inner City Broadcasting Corporation.
2. Letter and notification of reason to believe finding to the Committee to Re-Elect Congressman Charles B. Rangel.

2 April 1980
DATE



CHARLES N. STEELE
GENERAL COUNSEL

8004022355



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Inner City Broadcasting Corporation
Operating Account
801 Second Avenue
New York, New York 10017

Re: MUR 1151

Dear Sirs:

In the normal course of its supervisory responsibilities, the Federal Election Commission has found reason to believe that the Inner City Broadcasting Corporation has violated section 441b(a) of the Federal Election Campaign Act of 1971, as amended (the "Act").

A report on the Commission's finding is enclosed for your information. You may submit any factual or legal materials which you believe to be relevant to the Commission's analysis of this matter.

In the absence of any information which demonstrates that no further action should be taken against you, the Commission may find probable cause to believe that a violation has occurred, and proceed with formal conciliation. Of course, this does not preclude the settlement of this matter through informal conciliation prior to a finding of probable cause to believe if you so desire. A brief description of the Commission's procedures for handling possible violations is enclosed.

If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications for the Commission.

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

Letter to: Inner City Broadcasting Corporation
Operating Account

Page: 2

If you have any questions, please contact Carolyn
Weeder, the staff member assigned to this matter at
(202)523-4529.

Sincerely,

Enclosures (2)

Reason to Believe Notification
Procedures

30040222337

FEDERAL ELECTION COMMISSION

NOTIFICATION OF REASON TO BELIEVE FINDING

DATE: _____

MUR NO. 1151
STAFF MEMBER(S) & TEL. NO.
Carolyn Weeder
(202)523-4529

RESPONDENT: Inner City Broadcasting
Corporation

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

BACKGROUND

On January 7, 1980, the Reports Analysis Division (RAD) referred to the Office of General Counsel the matter in which the Inner City Broadcasting Corporation may have violated 2 U.S.C. § 441b(a) by making a corporate contribution to the Committee to Re-Elect Congressman Charles B. Rangel.

FACTUAL BASIS AND LEGAL ANALYSIS

During the course of normal review, RAD disclosed that the Inner City Broadcasting Corporation (incorporated in 1977) made a \$1,000 contribution to the Committee to Re-Elect Congressman Charles B. Rangel (the "Committee") on September 15, 1978. The Committee refunded the unlawful contribution to the Inner City Broadcasting Corporation on February 5, 1979 upon notification by RAD of the violation.

2 U.S.C. § 441b(a) prohibits corporations from making contributions to a political committee in connection with federal election activities. In that the Inner City Broadcasting Corporation made a \$1,000 contribution to the principal campaign committee of a federal candidate, the Federal Election Commission has found reason to believe that the Inner City Broadcasting Corporation violated 2 U.S.C. § 441b(a).



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Richard A. Brown, Treasurer
Committee to Re-Elect Congressman
Charles B. Rangel
2030 Allen Place, N. W.
Washington, D.C. 20009

Re: MUR 1151

Dear Mr. Brown:

The Federal Election Commission notified you in a surface violation letter dated January 29, 1979, that your committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended (the "Act").

Upon further review of the information available to the Commission, the Commission determined on April , 1980, that there is reason to believe that you may have violated 2 U.S.C. § 441b(a). A report on the Commission's finding is attached for your information. You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

In the absence of any additional information which demonstrates that no further action should be taken against your committee, the Commission may find probable cause to believe that a violation has occurred, and proceed with formal conciliation. Of course, this does not preclude the settlement of this matter through informal conciliation prior to a finding of probable cause to believe if you so desire.

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.

Letter to: Richard A. Brown
Page: 2

If you have any questions, please contact Carolyn Weeder,
the staff member assigned to this matter at (202)523-4529.

Sincerely,

8004022360

FEDERAL ELECTION COMMISSION

NOTIFICATION OF REASON TO BELIEVE FINDING

DATE: _____

MUR NO: 1151
STAFF MEMBER(S) & TEL. NO.
Carolyn Weeder
(202)523-4529

RESPONDENT: Committee to Re-Elect
Congressman Charles B. Rangel

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

BACKGROUND

On January 7, 1980, the Reports Analysis Division (RAD) referred to the Office of General Counsel the matter in which the Committee to Re-Elect Congressman Charles B. Rangel (the "Committee") may have violated 2 U.S.C. § 441b(a) by accepting a corporate contribution.

FACTUAL BASIS AND LEGAL ANALYSIS

During the course of normal review, RAD disclosed that the Committee accepted a \$1,000 corporate contribution from the Inner City Broadcasting Corporation on September 15, 1978. A surface violation letter was sent to the Committee on January 29, 1979 advising it of the possible 2 U.S.C. § 441b(a) violation. The Committee subsequently refunded the contribution to the Inner City Broadcasting Corporation on February 5, 1979.

2 U.S.C. § 441b(a) prohibits any political committee from accepting any contributions from corporations. The Committee accepted the \$1,000 contribution from the Inner City Broadcasting Corporation whose name clearly reveals its corporate status.

Based on the foregoing analysis, the Federal Election Commission has found reason to believe that the Committee to Re-Elect Congressman Charles B. Rangel violated 2 U.S.C. § 441b(a) by accepting a corporate contribution.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Committee to Re-Elect Congressman) MUR 1151
Charles B. Rangel)
Inner City Broadcasting Corporation)

CERTIFICATION

I, Marjorie W. Emmons, Recording Secretary to the Federal Election Commission's Executive Session on February 20, 1980, do hereby certify that the Commission decided by a vote of 6-0 to reject the recommendations contained in the General Counsel's First Report on MUR 1151 and to find reason to believe that Inner City Broadcasting Corporation is in violation of 2 U.S.C. §441b(a) by making a corporate contribution.

Attest:

3/21/80

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO: CHARLES STEELE *mwe*
FROM: MARJORIE W. EMMONS/MARGARET CHANEY *me*
DATE: MARCH 7, 1980
SUBJECT: OBJECTIONS- MUR 1151 - First General
Report dated 3-5-80, Received in
OCS 3-5-80, 1:12

The above-named document was circulated on a 48
hour vote basis at 4:00, March 5, 1980.

Commissioners Aikens and Reiche have submitted
objections thereby placing MUR 1151 on the Executive
Session Agenda for Tuesday, March 11, 1980.

March 5, 1980

MEMORANDUM TO: Marjorie W. Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 1151

Pleas have the attached First GC Report on MUR 1151
distributed to the Commission onaa 48 hour tally basis.
Thank you.

3004022364

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

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION

3-5-80

MUR # 11151 P 1 : 12

STAFF MEMBER(S) -

Weeder

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

RESPONDENT'S NAME: Committee to Re-Elect Congressman Charles B. Rangel
Inner City Broadcasting Corporation

RELEVANT STATUTE: 2 U.S.C. § 441b(a)

INTERNAL REPORTS CHECKED: Committee to Re-Elect Congressman Charles
B. Rangel FEC Reports

FEDERAL AGENCIES CHECKED: None

SUMMARY OF ALLEGATIONS

On January 7, 1980, the Reports Analysis Division (RAD) referred to the Office of General Counsel the matter in which the Committee to Re-Elect Congressman Charles B. Rangel ("the Committee") may have violated 2 U.S.C. § 441b(a) by accepting a corporate contribution, and the Inner City Broadcasting Corporation may have violated the same provision by making an unlawful contribution.

During the course of normal review, RAD disclosed that the Committee accepted a \$1,000 corporate contribution on September 15, 1978, from the Inner City Broadcasting Corporation (incorporated on January 28, 1977). 1/ A surface violation letter was sent to the Committee on January 29, 1979, advising it of the possible 2 U.S.C. § 441b(a) violation.

FACTUAL AND LEGAL ANALYSIS

After notification by RAD, the Committee took prompt actions to rectify the violation by refunding the improper contribution within a week of the initial notice. In addition, the Committee submitted a copy of the check refunding the contribution in question. 2/

Inasmuch as the Committee properly reported the contribution upon both its receipt and its refund, and as the Committee responded

1/ See page 3 of attached RAD referral.

2/ See page 7 of referral.

promptly to Commission notification, the Office of General Counsel recommends taking no further action with regard to the Committee's possible violation of 2 U.S.C. § 441b(a) by accepting a corporate contribution. Accordingly, this Office recommends taking no further action with regard to the Inner City Broadcasting Corporation's possible violation of 2 U.S.C. § 441b(a) by making a corporate contribution. It is recommended, however, that the attached letters of admonition be approved by the Commission and sent to the respondents.

RECOMMENDATIONS

1. Take no further action with regard to the Committee to Re-Elect Congressman Charles B. Rangel's possible violation of 2 U.S.C. § 441b(a) by accepting a corporate contribution.
2. Take no further action with regard to the Inner City Broadcasting Corporation's possible violation of 2 U.S.C. § 441b(a) by making a corporate contribution.
3. Approve and send the attached letters to Richard A. Brown, Treasurer of the Committee to Re-Elect Congressman Charles B. Rangel and to the Inner City Broadcasting Corporation.
4. Close the file.

Attachments:

RAD Referral
Letter to Richard A. Brown, Treasurer
Committee to Re-Elect Congressman Charles B. Rangel
Letter to Inner City Broadcasting Corporation

REFER TO INSTRUCTIONS ON REVERSE SIDE BEFORE COMPLETING

REPORTS ANALYSIS REFERRAL SHEET

DATE 1-27-80 ANALYST Mike Filler
TO: OFFICE OF GENERAL COUNSEL TEAM CHIEF Peter Kell, Jr.
THROUGH: STAFF DIRECTOR OP COMPLIANCE REVIEW CB/RS
FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS JH

CANDIDATE COMMITTEE: COMMITTEE TO RE-ELECT CONGRESSMAN CHARLES B. RANGEL

TREASURER: Richard A. Brown
ADDRESS: 2030 Allen Place, N.W.
Washington, D.C. 20009
AFFILIATE(S): NONE

ALLEGATION(S): CITE: ATTACHMENT(S):
Receipt of corporate contribution 2 U.S.C. 441b 2

MANNER IN WHICH REVIEW WAS INITIATED (if other than normal review), AND DATE:

ATTACHMENT

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM January 1, 1978 TO November 27, 1978
TOTAL RECEIPTS \$ 47,606 TOTAL EXPENDITURES \$ 33,339
CASH ON HAND \$ 15,611 DEBTS \$ -0-

HISTORY:

RESULTS OF REVIEW: ATTACHMENT
Surface violation letter sent on January 29, 1979. 3

Response received February 5, 1979 stating that \$1,000 contribution had been refunded. 4

COMMUNICATIONS WITH CANDIDATE COMMITTEE ATTACHMENT

NONE

REASON(S) FOR REFERRAL ATTACHMENT

Refund of corporate contribution exceeds RAD threshold for referral to OGC.

OTHER PENDING ACTIONS INITIATED BY RAD: ATTACHMENT

OTHER RELEVANT INFORMATION:

Copy of check for contribution refund.

FEDERAL ELECTION COMMISSION
1972-1978
CANDIDATE INDEX OF SUPPORTING DOCUMENTS - (E)

DATE 7/20/79

CANDIDATE/COMMITTEE/DOCUMENT	OFFICE SOUGHT/	PARTY	RECEIPTS		EXPENDITURES		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
			PRIMARY	GENERAL	PRIMARY	GENERAL			
RANGEL, CHARLES B.	HOUSE	19 DEMOCRATIC PARTY			NEW YORK		1978 ELECTION	ID# H64Y19029	
1. STATEMENT OF CANDIDATE							8JUL77	1	77HSC/123/3949
1977 STATEMENT OF CANDIDATE									
2. CANDIDATE REPORTS OF RECEIPT & EXPENDITURES									
1977 APRIL 10 QUARTERLY	3A - POSTCARD						1JAN77 -31MAR77	1	77HSC/121/3224
APRIL 10 QUARTERLY	- AMENDMENT						1JAN77 -31MAR77	1	77HSC/125/0020
JULY 10 QUARTERLY	3A - POSTCARD						1APR77 -30JUN77	1	77HSC/123/3949
OCTOBER 10 QUARTERLY	3A - POSTCARD						1JUL77 -30SEP77	1	77HSC/125/3215
YEAR END REPORT			0		0		1OCT77 -31DEC77	1	78HSC/129/2354
1978 APRIL 10 QUARTERLY			0		0		1JAN78 -31MAR78	1	78HSC/132/3818
JULY 10 QUARTERLY			0		0		1APR78 -30JUN78	1	78HSC/142/1280
OCTOBER 10 QUARTERLY			0		0		1JUL78 -30SEP78	1	78HSC/151/2053
10 DAY PRE-GENERAL				0		0	1OCT78 -23OCT78	1	78HSC/151/3998
30 DAY POST-GENERAL				0		0	24OCT78 -27NOV78	1	78HSC/157/0020
YEAR END REPORT				0		0	28NOV78 -31DEC78	1	79HSC/161/0000
TOTAL			0	0	0	0		11	TOTAL PAGES
3. PRINCIPAL CAMPAIGN COMMITTEE									
COMMITTEE TO RE-ELECT CONGRESSMAN CHARLES B. RANGEL								ID# C00004242	
1977 MISCELLANEOUS REPORT							16JUN77 FROM FEC	1	77FEC/057/4252
MISCELLANEOUS REPORT							1JUL77 TO FEC	1	77HSC/123/3950
MISCELLANEOUS REPORT							19JUL77 TO FEC	2	77FEC/053/4465
STATEMENT OF ORGANIZATION - AMENDMENT							7NOV77	1	77HSC/127/0315
STATEMENT OF ORGANIZATION - AMENDMENT							8NOV77	1	77HSC/137/0301
STATEMENT OF ORGANIZATION - AMENDMENT							17NOV77	3	77HSC/127/1101
1978 48 HOUR CONTRIBUTION NOTICE							6OCT78	1	78HSC/155/3274
1977 APRIL 10 QUARTERLY				645		6,263	1JAN77 -31MAR77	4	77HSC/121/3956
REQUEST FOR ADDITIONAL INFORMATION								4	77FEC/053/3998
REQUEST FOR ADDITIONAL INFORMATION							1JAN77 -31MAR77	3	77FEC/053/3952
APRIL 10 QUARTERLY - AMENDMENT								3	77HSC/123/3955
JULY 10 QUARTERLY - 3A - POSTCARD							1APR77 -30JUN77	1	77HSC/123/3947
OCTOBER 10 QUARTERLY 3A - POSTCARD							1JUL77 -30SEP77	1	77HSC/125/3082
REQUEST FOR ADDITIONAL INFORMATION								1	77FEC/053/4218
REQUEST FOR ADDITIONAL INFORMATION								1	77FEC/053/4211
YEAR END REPORT				3,050		0	1OCT77 -31DEC77	5	78HSC/129/2358
REQUEST FOR ADDITIONAL INFORMATION							1OCT77 -31DEC77	3	78FEC/072/0000
YEAR END REPORT - AMENDMENT							1APR77 -31DEC77	1	78HSC/131/0000
YEAR END REPORT - AMENDMENT				3,850		0	1OCT77 -31DEC77	3	78HSC/145/4000
1978 APRIL 10 QUARTERLY			925		1,233		1JAN78 -31MAR78	5	78HSC/132/3811
JULY 10 QUARTERLY			28,831		13,175		1APR78 -30JUN78	17	78HSC/142/1268
REQUEST FOR ADDITIONAL INFORMATION							1APR78 -30JUN78	3	78FEC/086/1396
REQUEST FOR ADDITIONAL INFORMATION							1APR78 -30JUN78	1	78FEC/086/1400
REQUEST FOR ADDITIONAL INFO. 2ND							30JUN78	1	77FEC/112/0492
REQUEST FOR ADDITIONAL INFORMATION							30JUN78	1	79FEC/120/3644
JULY 10 QUARTERLY - AMENDMENT			26,281		13,975		1APR78 -30JUN78	5	78HSC/145/4000
JULY 10 QUARTERLY - AMENDMENT			26,681		12,825		1APR78 -30JUN78	5	78HSC/151/2048
JULY 10 QUARTERLY - AMENDMENT							1APR78 -30JUN78	1	79HSC/160/2038
OCTOBER 10 QUARTERLY				11,800		9,007	1JUL78 -30SEP78	9	78HSC/151/2077
REQUEST FOR ADDITIONAL INFORMATION							1JUL78 -30SEP78	3	79FEC/112/5124
REQUEST FOR ADDITIONAL INFORMATION							30SEP78	1	79FEC/118/1701
OCTOBER 10 QUARTERLY - AMENDMENT							30SEP78	1	79HSC/162/0971
OCTOBER 10 QUARTERLY - AMENDMENT							1OCT78 -23OCT78	2	79HSC/160/2042
10 DAY PRE-GENERAL				1,550		6,283	1OCT78 -23OCT78	5	79HSC/161/4021
30 DAY POST-GENERAL				6,650		3,908	24OCT78 -27NOV78	0	79HSC/157/0020
YEAR END REPORT				500		3,447	28NOV78 -31DEC78	4	79HSC/151/0766
TOTAL			27,606	24,995	14,058	29,180		113	TOTAL PAGES

REPORTS REVIEWED

Page 2

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution in Kind,
 Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a
 of FEC FORM 3

Page 2 of 3 for
 Line Number 14(a)

(Use these six Schedules for
 each numbered line)

Name of Candidate or Committee in Full

Committee to Re-elect Congressman Charles B. Rangel

Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
8/ Inner City Broadcasting Corp., Operating Account 801 Second Avenue New York, NY 10017	1/28/77 INC. Occupation	9/15/78	1,000.00
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date \$ 1,000.00		
5/ Full Name, Mailing Address and ZIP Code Orin Lehman 67 East 82nd Street New York, NY 10023	Commissioner of Parks and Recreation, New York, NY Occupation	9/25/78	250.00
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date \$ 250.00		
Full Name, Mailing Address and ZIP Code Valerie L. Levy 70 West 95th Street New York, NY 10025	Department of Aging New York, NY Occupation Human Services Administrator	8/10/78	100.00
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date \$ 100.00		
Full Name, Mailing Address and ZIP Code E. Odus Lowery 1250 Fifth Avenue New York, NY 10039	Education Opportunity Center State University of New York Occupation job placement officer	7/5/78	100.00
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date \$ 100.00		
Full Name, Mailing Address and ZIP Code William J. Lubie 139 West 94th Street New York, NY 10025	Kagan & Lubie New York, NY Occupation attorney	9/25/78	250.00
Receipt for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date \$ 250.00		
8/ Full Name, Mailing Address and ZIP Code Metropolitan Employees' Political Participation Fund One Madison Avenue New York, NY 10010	Occupation C00040923	7/17/78	200.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date \$ 200.00		
Full Name, Mailing Address and ZIP Code Leon R. McKinney 50 West 96th Street New York, NY 10025	New York, New York Occupation Medical Doctor	7/28/78	100.00
Receipt for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date \$ 100.00		
TOTAL of receipts (this page optional)			\$ 2,000.00
TOTAL this period (list page this line number only)			\$



FEDERAL ELECTION COMMISSION

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

29 January 1979

Mr. Richard A. Brown, Treasurer
Committee to Re-Elect Congressman Charles B. Rangel
2030 Allen Place, N.W.
Washington, D.C. 20009

Dear Mr. Brown:

This letter is prompted by the Commission's interest in assisting candidates and committees who wish to comply with the Federal Election Campaign Act, as amended. During review of the October 10, 1978 Report of Receipts and Expenditures, we noticed an entry indicating that you may have accepted a contribution from a corporation. Corporate contributions are prohibited by the Act, unless the contribution is made by a separate segregated fund established by the corporation. A copy of that portion of your report is attached for your review and clarification.

The Commission recommends that if you have accepted a prohibited contribution that you return the full amount to the donor. The return of the contribution should be reported immediately by letter and should be reflected as a contribution refund on your next report of receipts and expenditures. If the identification of the source of this contribution is incomplete or incorrect, on the original report, please submit a statement which would clarify this particular matter for the public record. You may do so by amending your original report by letter.

Please notify the Commission within fifteen (15) days from the date of this letter of the determination made on this matter. If you have any questions concerning this matter, please do not hesitate to contact Mike Filler (800)424-9530, our Reports Analyst assigned to you. Our local telephone number is 523-4175.

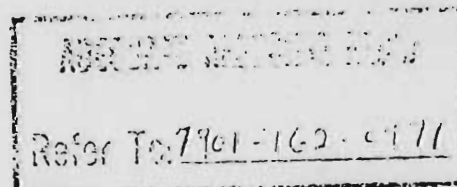
Sincerely,

Orlando B. Potter

Orlando B. Potter
Staff Director

Enclosure

Certified Mail:
Return Receipt Requested



HAND DELIVERED

1279FEB-5 PM 3:12

Committee to Re-elect
Congressman Charles B. Rangel
2030 Allen Place, NW
Washington, D.C. 20009
February 5, 1979

Mr. Mike Filler
Federal Election Commission
1325 K Street, NW
Washington, D.C. 20463

Dear Mr. Filler:

Pursuant to your recent correspondence concerning the contribution of \$1,000 from the "ICNC Operating Account - WELS/WLIB" to the Committee to Re-elect Congressman Charles B. Rangel which was reported to the Federal Election Commission in the October 10, 1978 Report of Receipts and Expenditures of the Committee, please be advised that the contribution in question was refunded by the Committee on this date, February 5, 1979.

Sincerely,

Richard A. Brown

RICHARD A. BROWN
Treasurer

RAB:p

Page 5

3001022271
7901 1620971

HAND DELIVERED

RECEIVED
OFFICE OF RECORDS & REGISTRATION

1979 JUL 10 PM 4:27

OFFICE OF THE CLERK
U.S. HOUSE OF REPRESENTATIVES

007382

Committee to Re-elect Cong.
Charles B. Rangel
2030 Allen Place, NW
Washington, D.C. 20009
July 10, 1979

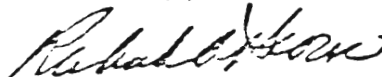
Federal Election Commission
1325 K Street, NW
Washington, D.C. 20463

Dear Sir:

In response to a request from your office, I am enclosing a copy of the cancelled check drawn on the Committee to Re-elect Congressman Charles B. Rangel Account on February 5, 1979 and made payable to the ICBC Operating Account-WBLS/WLIB.

This check represents a refund of a contribution received by the Committee on September 19th, 1978.

Sincerely,



Richard A. Brown
Treasurer

RAB:p
Enclosure

Page 6

C00004242

300402237
 70011553320

COMMITTEE TO RE-ELECT CONGRESSMAN CHARLES B. RANGEL 125 AFRONT AVENUE, N.W. WASHINGTON, D.C. 20005		971 $\frac{1,434}{200}$
PAY TO THE ORDER OF ICBC Operating Account		February 5, 1979
One thousand and no/100		\$ 1,000.00
X-A 6 1/100		DOLLARS
OCT Freedom National Bank 275 WEST 125th STREET NEW YORK, N.Y. 10028		
refund of 6/7/78 contribution General Contribution		"0000100000"



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Inner City Broadcasting Corporation
Operating Account
801 Second Avenue
New York, New York 10017

Re: MUR 1151

Dear Sirs:

Our records indicate that your corporation made a contribution of \$1,000 to the Committee to Re-Elect Congressman Charles B. Rangel ("the Committee") on September 15, 1978. Additionally, a refund was made to you by the Committee for the same amount on February 5, 1979.

Section 441b(a) of the Federal Election Campaign Act of 1971, as amended ("the Act"), makes it unlawful for any corporation to make contributions in connection with federal election activities. However, after considering the circumstances of this matter, the Commission has determined to take no further action and to close the file. This matter will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The Commission reminds you that making such contributions is in violation of 2 U.S.C. § 441b(a) and you should take immediate steps to insure that this activity does not occur in the future. If you have any questions, please direct them to Carolyn Weeder at (202) 523-4529.

Sincerely,

Charles N. Steele
General Counsel



FEDERAL ELECTION COMMISSION

WASHINGTON D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Richard A. Brown, Treasurer
Committee to Re-Elect Congressman
Charles B. Rangel
2030 Allen Place, N.W.
Washington, D.C. 20009

Re: MUR 1151

Dear Mr. Brown:

On January 29, 1979, the Commission notified you that your Committee may have violated § 441b(a) of the Federal Election Campaign Act of 1971, as amended ("the Act"), by accepting a corporate contribution from the Inner City Broadcasting Corporation. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file regarding this matter. This matter will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

The Commission reminds you that accepting contributions from corporations is a violation of 2 U.S.C. § 441b(a) and you should take immediate steps to insure that this activity does not occur in the future. If you have any questions, please direct them to Carolyn Weeder at (202) 523-4529.

Sincerely,

Charles N. Steele
General Counsel

3 0 0 1 0 2 2
REFER TO INSTRUCTIONS ON REVERSE SIDE BEFORE COMPLETING

REPORTS ANALYSIS REFERRAL SHEET

DATE 1-2-80

ANALYST Mike Filler *MF*

TO: OFFICE OF GENERAL COUNSEL

TEAM CHIEF Peter Kell, Jr. *PKS*

THROUGH: STAFF DIRECTOR *APL*

COMPLIANCE REVIEW LB/RS

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS *JH*

CANDIDATE/COMMITTEE: COMMITTEE TO RE-ELECT CONGRESSMAN CHARLES B. RANGEL

TREASURER: Richard A. Brown

ADDRESS: 2030 Allen Place, N.W.
Washington, D.C. 20009

AFFILIATE(S): NONE

ALLEGATION(S):	CITE:	ATTACHMENT(S)
Receipt of corporate contribution	2 U.S.C. 441b	2

MANNER IN WHICH REVIEW WAS INITIATED if other than normal review, AND DATE:

ATTACHMENT

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM January 1, 1978 TO November 27, 1978

TOTAL RECEIPTS \$ 47,606. TOTAL EXPENDITURES \$ 33,339.

CASH ON HAND \$ 15,611. DEBTS \$ -0-

HISTORY:

RESULTS OF REVIEW:	ATTACHMENT
Surface violation letter sent on January 29, 1979.	3

Response received February 5, 1979 stating that \$1,000 contribution had been refunded.

COMMUNICATIONS WITH CANDIDATE/COMMITTEE:	ATTACHMENT
--	------------

NONE

REASON(S) FOR REFERRAL:	ATTACHMENT
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Refund of corporate contribution exceeds RAD threshold for referral to OGC.

OTHER PENDING ACTIONS INITIATED BY RAD:	ATTACHMENT
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OTHER RELEVANT INFORMATION:

Copy of check for contribution refund.

5

Page 1

REFER TO INSTRUCTIONS ON REVERSE SIDE BEFORE COMPLETING

REPORTS ANALYSIS REFERRAL SHEET

DATE 1-27-80ANALYST Mike Filler

TO: OFFICE OF GENERAL COUNSEL

TEAM CHIEF Peter Kell, Jr.

THROUGH: STAFF DIRECTOR

COMPLIANCE REVIEW CB/RS

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS

CANDIDATE/COMMITTEE: COMMITTEE TO RE-ELECT CONGRESSMAN CHARLES B. RANGEL

TREASURER: Richard A. Brown

ADDRESS: 2030 Allen Place, N.W.
Washington, D.C. 20009

AFFILIATE(S): NONE

ALLEGATION(S):

CITE:

ATTACHMENT(S)

Receipt of corporate contribution 2 U.S.C. 441b

2

MANNER IN WHICH REVIEW WAS INITIATED if other than normal review, AND DATE:

ATTACHMENT

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM January 1, 1978 TO November 27, 1978TOTAL RECEIPTS \$ 47,606.TOTAL EXPENDITURES \$ 33,339.CASH ON HAND \$ 15,611.DEBTS \$ -0-

HISTORY:

RESULTS OF REVIEW:

ATTACHMENT

Surface violation letter sent on January 29, 1979.

3

Response received February 5, 1979 stating that \$1,000 contribution had been refunded.

4

COMMUNICATIONS WITH CANDIDATE/COMMITTEE:

ATTACHMENT

NONE

REASON(S) FOR REFERRAL:

ATTACHMENT

Refund of corporate contribution exceeds RAD threshold for referral to OGC.

OTHER PENDING ACTIONS INITIATED BY RAD:

ATTACHMENT

OTHER RELEVANT INFORMATION:

Copy of check for contribution refund.

FEDERAL ELECTION COMMISSION
3 0 0 1977-1978 7 3
CANDIDATE INDEX OF SUPPORTING DOCUMENTS - (E)

CANDIDATE/COMMITTEE/DOCUMENT	OFFICE SOUGHT/	PARTY	RECEIPTS		EXPENDITURES		COVERAGE DATES	# OF PAGES	LOCATION
			PRIMARY	GENERAL	PRIMARY	GENERAL			
RANGEL, CHARLES B.	HOUSE	19 DEMOCRATIC PARTY					NEW YORK		1978 ELECTION ID# HGRY19029
1. STATEMENT OF CANDIDATE									
1977 STATEMENT OF CANDIDATE							9JUL77	1	77HSE/123/3940
2. CANDIDATE REPORTS OF RECEIPT & EXPENDITURES									
1977 APRIL 10 QUARTERLY		3A - POSTCARD					1JAN77 -31MAR77	1	77HSE/121/3724
APRIL 10 QUARTERLY		- AMENDMENT					1JAN77 -31MAR77	1	77HSE/125/0220
JULY 10 QUARTERLY		3A - POSTCARD					1APR77 -30JUN77	1	77HSE/123/3940
OCTOBER 10 QUARTERLY		3A - POSTCARD					1JUL77 -30SEP77	1	77HSE/125/3215
YEAR END REPORT			0		0		1OCT77 -31DEC77	1	77HSE/129/2363
1978 APRIL 10 QUARTERLY			0		0		1JAN78 -31MAR78	1	78HSE/132/3819
JULY 10 QUARTERLY			0		0		1APR78 -30JUN78	1	78HSE/142/1280
OCTOBER 10 QUARTERLY			0		0		1JUL78 -30SEP78	1	78HSE/151/2953
10 DAY PRE-GENERAL				0		0	1OCT78 -23OCT78	1	78HSE/151/39
30 DAY POST-GENERAL				0		0	24OCT78 -27NOV78	1	78HSE/157/0200
YEAR END REPORT				0		0	28NOV78 -31DEC78	1	78HSE/161/0770
TOTAL			0	0	0	0		11	TOTAL PAGES
3. PRINCIPAL CAMPAIGN COMMITTEE									
COMMITTEE TO RE-ELECT CONGRESSMAN CHARLES B. RANGEL							ID# C00004242		
1977 MISCELLANEOUS REPORT							16JUN77 FROM FEC	1	77FEC/057/4252
MISCELLANEOUS REPORT							1JUL77 TO FEC	1	77HSE/123/2505
MISCELLANEOUS REPORT							19JUL77 TO FEC	2	77FEC/053/4425
STATEMENT OF ORGANIZATION - AMENDMENT							7NOV77	1	77HSE/127/0315
STATEMENT OF ORGANIZATION - AMENDMENT							3NOV77	1	77HSE/127/0331
STATEMENT OF ORGANIZATION - AMENDMENT							17NOV77	3	77HSE/127/1181
1978 48 HOUR CONTRIBUTION NOTICE							4OCT78	1	78HSE/155/3274
1977 APRIL 10 QUARTERLY				645		6,263	1JAN77 -31MAR77	4	77HSE/121/3956
REQUEST FOR ADDITIONAL INFORMATION								4	77FEC/053/3590
REQUEST FOR ADDITIONAL INFORMATION							1JAN77 -31MAR77	3	77FEC/052/3352
APRIL 10 QUARTERLY		- AMENDMENT						3	77HSE/123/3050
JULY 10 QUARTERLY		3A - POSTCARD					1APR77 -30JUN77	1	77HSE/123/3947
OCTOBER 10 QUARTERLY		3A - POSTCARD					1JUL77 -30SEP77	1	77HSE/125/3502
REQUEST FOR ADDITIONAL INFORMATION								1	77FEC/053/4213
REQUEST FOR ADDITIONAL INFORMATION								1	77FEC/053/4211
YEAR END REPORT				3,850		0	1OCT77 -31DEC77	5	78HSE/129/2358
REQUEST FOR ADDITIONAL INFORMATION							1OCT77 -31DEC77	3	78FEC/072/270
YEAR END REPORT		- AMENDMENT					1APR77 -31DEC77	1	78HSE/131/3820
YEAR END REPORT		- AMENDMENT		3,850		0	1OCT77 -31DEC77	3	78HSE/145/4005
1978 APRIL 10 QUARTERLY			925		1,233		1JAN78 -31MAR78	5	78HSE/132/3811
JULY 10 QUARTERLY			28,031		13,175		1APR78 -30JUN78	17	78HSE/142/1263
REQUEST FOR ADDITIONAL INFORMATION							1APR78 -30JUN78	3	78FEC/084/1306
REQUEST FOR ADDITIONAL INFORMATION							1APR78 -30JUN78	1	78FEC/084/1400
REQUEST FOR ADDITIONAL INFO. 2ND							30JUN78	1	78FEC/117/0402
REQUEST FOR ADDITIONAL INFORMATION							30JUN78	1	78FEC/120/3444
JULY 10 QUARTERLY		- AMENDMENT	26,281		13,975		1APR78 -30JUN78	5	78HSE/145/4000
JULY 10 QUARTERLY		- AMENDMENT	26,681		12,825		1APR78 -30JUN78	5	78HSE/151/2048
JULY 10 QUARTERLY		- AMENDMENT					1APR78 -30JUN78	1	78HSE/160/3636
OCTOBER 10 QUARTERLY				11,800		9,007	1JUL78 -30SEP78	2	78HSE/151/2039
REQUEST FOR ADDITIONAL INFORMATION							1JUL78 -30SEP78	3	78FEC/117/5124
REQUEST FOR ADDITIONAL INFORMATION							30SEP78	1	78FEC/118/1701
OCTOBER 10 QUARTERLY		- AMENDMENT					30SEP78	1	78HSE/162/0971
OCTOBER 10 QUARTERLY		- AMENDMENT					1OCT78 -23OCT78	3	78HSE/164/2043
10 DAY PRE-GENERAL				1,550		6,283	1OCT78 -23OCT78	6	78HSE/161/4031
30 DAY POST-GENERAL				6,650		3,980	24OCT78 -27NOV78	9	78HSE/157/0272
YEAR END REPORT				500		3,647	28NOV78 -31DEC78	4	78HSE/161/0766
TOTAL			27,606	24,995	14,058	29,188		113	TOTAL PAGES

REPORTS REVIEWED

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution in Kind,
 Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a
 of FEC FORM 3

Page 2 of 3 for

Line Number 14(a)

(Use these line schedules for
 each numbered line)

Name of Candidate or Committee in Full

Committee to Re-elect Congressman Charles B. Rangel

Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Inner City Broadcasting Corp. Operating Account 801 Second Avenue New York, NY 10017	1/28/77 INC. Occupation	9/15/78	1,000.00
Receipt for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date \$1,000.00		
Full Name, Mailing Address and ZIP Code Orin Lehman 67 East 82nd Street New York, NY 10023	Commissioner of Parks and Recreation, New York, NY Occupation	9/25/78	250.00
Receipt for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date \$ 250.00		
Full Name, Mailing Address and ZIP Code Valerie L. Levy 70 West 95th Street New York, NY 10025	Department of Aging New York, NY Occupation Human Services Administrator	8/10/78	100.00
Receipt for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date \$ 100.00		
Full Name, Mailing Address and ZIP Code Broadus Lowery 1250 Fifth Avenue New York, NY 10039	Education Opportunity Center State University of New York Occupation Job placement officer	7/5/78	100.00
Receipt for <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date \$ 100.00		
Full Name, Mailing Address and ZIP Code William J. Lubic 139 West 94th Street New York, NY 10025	Kagan & Lubic New York, NY Occupation attorney	9/25/78	250.00
Receipt for <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date \$ 250.00		
Full Name, Mailing Address and ZIP Code Metropolitan Employees' Political Participation Fund One Madison Avenue New York, NY 10010	Occupation C00040923	7/17/78	200.00
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date \$ 200.00		
Full Name, Mailing Address and ZIP Code Leon R. McKinney 50 West 96th Street New York, NY 10025	New York, New York Occupation Medical Doctor	7/28/78	100.00
Receipt for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date \$ 100.00		
SUBTOTAL of receipts this page (optional)			\$ 2,000.00
TOTAL this period (last page this line number only)			\$



FEDERAL ELECTION COMMISSION

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

29 January 1979

Mr. Richard A. Brown, Treasurer
Committee to Re-Elect Congressman Charles B. Rangel
2030 Allen Place, N.W.
Washington, D.C. 20009

Dear Mr. Brown:

30010222330
This letter is prompted by the Commission's interest in assisting candidates and committees who wish to comply with the Federal Election Campaign Act, as amended. During review of the October 10, 1978 Report of Receipts and Expenditures, we noticed an entry indicating that you may have accepted a contribution from a corporation. Corporate contributions are prohibited by the Act, unless the contribution is made by a separate segregated fund established by the corporation. A copy of that portion of your report is attached for your review and clarification.

The Commission recommends that if you have accepted a prohibited contribution that you return the full amount to the donor. The return of the contribution should be reported immediately by letter and should be reflected as a contribution refund on your next report of receipts and expenditures. If the identification of the source of this contribution is incomplete or incorrect, on the original report, please submit a statement which would clarify this particular matter for the public record. You may do so by amending your original report by letter.

Please notify the Commission within fifteen (15) days from the date of this letter of the determination made on this matter. If you have any questions concerning this matter, please do not hesitate to contact Mike Filler (800)424-9530, our Reports Analyst assigned to you. Our local telephone number is 523-4175.

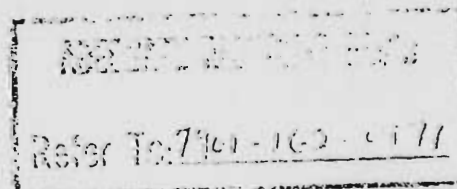
Sincerely,

Orlando B. Potter

Orlando B. Potter
Staff Director

Enclosure

Certified Mail:
Return Receipt Requested



● SENDER Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse				
1. The following service is requested (check one). <input type="checkbox"/> Show to whom and date delivered <input checked="" type="checkbox"/> Show to whom, date, and address of delivery <input type="checkbox"/> RESTRICTED DELIVERY Show to whom and date delivered <input type="checkbox"/> RESTRICTED DELIVERY Show to whom, date, and address of delivery \$..... (CONSULT POSTMASTER FOR FEES)				
2. ARTICLE ADDRESSED TO:				
3. ARTICLE DESCRIPTION: <table style="width: 100%; border: none;"> <tr> <td style="border: 1px solid black; width: 33%; padding: 5px;">REGISTERED NO.</td> <td style="border: 1px solid black; width: 33%; padding: 5px;">CERTIFIED NO. 943763</td> <td style="border: 1px solid black; width: 33%; padding: 5px;">INSURED NO.</td> </tr> </table>		REGISTERED NO.	CERTIFIED NO. 943763	INSURED NO.
REGISTERED NO.	CERTIFIED NO. 943763	INSURED NO.		
(Always obtain signature of addressee or agent)				
I have received the article described above.				
SIGNATURE <input type="checkbox"/> Addressee <input checked="" type="checkbox"/> Authorized agent 				
4. DATE OF DELIVERY	POSTMARK			
5. ADDRESS (Complete only if requested)				
6. UNABLE TO DELIVER BECAUSE:	CLERK'S INITIALS			

☆GPO 1977-0-249-59

HAND DELIVERED

1279 FEB -5 PM 3:12

Committee to Re-elect
Congressman Charles B. Rangel
2030 Allen Place, NW
Washington, D.C. 20009
February 5, 1979

667352

Mr. Mike Filler
Federal Election Commission
1325 K Street, NW
Washington, D.C. 20463

Dear Mr. Filler:

Pursuant to your recent correspondence concerning the contribution of \$1,000 from the "ICNC Operating Account - WBLB/WLIB" to the Committee to Re-elect Congressman Charles B. Rangel which was reported to the Federal Election Commission in the October 10, 1978 Report of Receipts and Expenditures of the Committee, please be advised that the contribution in question was refunded by the Committee on this date, February 5, 1979.

Sincerely,

Richard A. Brown

RICHARD A. BROWN
Treasurer

RAB:p

30040212332
7901 1620971

HAND DELIVERED

RECEIVED
OFFICE OF RECORDS & REGISTRATION

1979 JUL 10 PM 4:27

OFFICE OF THE CLERK
U.S. HOUSE OF REPRESENTATIVES

007382

Committee to Re-elect Cong.
Charles B. Rangel
2030 Allen Place, NW
Washington, D.C. 20009
July 10, 1979

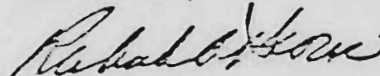
Federal Election Commission
1325 K Street, NW
Washington, D.C. 20463

Dear Sir:

In response to a request from your office, I am enclosing a copy of the cancelled check drawn on the Committee to Re-elect Congressman Charles B. Rangel Account on February 5, 1979 and made payable to the ICBC Operating Account-WBLS/WLIB.

This check represents a refund of a contribution received by the Committee on September 15th, 1978.

Sincerely,



Richard A. Brown
Treasurer

RAB:p
Enclosure

C00004242

3 0 0 4 0 2 2 5 3
 7 0 0 1 1 5 5 3.2 0

DATE	DESCRIPTION	AMOUNT
	refund of 6/7/78	
	contribution	
	to	
	General Contribution	

COMMITTEE TO RE-ELECT
 CONGRESSMAN CHARLES B. RANGEL
 1328 VERMONT AVENUE, N.W.
 WASHINGTON, D.C. 20005

971
 $\frac{1.434}{260}$
 February 5, 1979

PAY TO THE ORDER OF ICBC Operating Account WBLB/WLIB \$ 1,000.00

One thousand and no/100 ----- DOLLARS

FREEDOM NATIONAL BANK
 275 WEST 125th STREET NEW YORK, N.Y. 10019

0260000310 102 89870 0000100000

0260000310 102 89870 0000100000



FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR #

1151

Date Filmed 10/30/80 Camera No. --- 2

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