



FEDERAL ELECTION COMMISSION

1125 A STREET N.W.
WASHINGTON, D.C. 20461

THIS IS THE END OF TMR # 1183

Date Filmed 11/30/81 Camera No. --- 2

Cameraman LPC

FEDERAL ELECTION COMMISSION

Letters, Reports, Memos, Consultation
Agreements, Certifications, Voting
Sheets, Routing Slips

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

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

Signed

date

James Medford
Sept. 19, 1981

FEC 9-21-77

81840302114



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 18, 1981

Patrick A. Trueman
230 North Michigan Avenue
Suite 915
Chicago, Illinois 60601

RE: MUR 1183

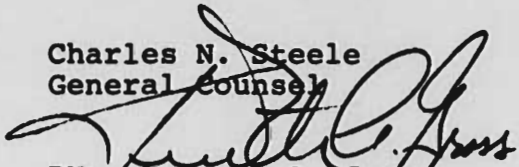
Dear Mr. Trueman:

On September 17, 1981, the Commission accepted the conciliation agreement signed by Joan Solms and the \$100 civil penalty check as settlement of a violation of 2 U.S.C. § 441b(a), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become a part of the public record, please advise us in writing.

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

Sincerely,

Charles N. Steele
General Counsel

BY: 
Kenneth A. Gross
Associate General Counsel

Enclosure:
Conciliation Agreement

81040302115



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Patrick A. Trueman
230 North Michigan Avenue
Suite 915
Chicago, Illinois 60601

RE: MUR 1183

Dear Mr. Trueman:

On , 1981, the Commission accepted the conciliation agreement signed by Joan Solms and the \$100 civil penalty check as settlement of a violation of 2 U.S.C. § 441b(a), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become a part of the public record, please advise us in writing.

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

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Enclosure:
Conciliation Agreement

JA
9-17-81

81040302116

BEFORE THE FEDERAL ELECTION COMMISSION

July 31, 1981

RECEIVED
 800#5435
 81 SEP 11 P12:21

In the Matter of)
)
 Family/Life League)

MUR 11891

01 SEP 11 P4:38

GENERAL COUNSEL

CONCILIATION AGREEMENT

This matter having been initiated by a signed, sworn, and notarized complaint by Marcena W. Love, an investigation having been conducted, and probable cause to believe having been found that Family/Life League ("Respondent") violated 2 U.S.C. § 441b(a) by making an expenditure in connection with a federal election.

NOW, THEREFORE, the Commission and Respondent, having duly entered into conciliation pursuant to 2 U.S.C. § 437g(a) (4)(A)(i) do hereby agree as follows:

I. The Commission has jurisdiction over the Respondent and the subject matter of this proceeding.

II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondent enters voluntarily into this Agreement with the Commission.

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

1. Respondent, Family/Life League, is a non-profit corporation.

2. Respondent conducted a survey of the three candidates who were running for the U.S. House of Representatives in the Illinois special election on December 11, 1979.

81042302117

3. Respondent published the results of its survey in three local newspapers. The cost of publishing the survey was \$599.14.

4. Respondent's publishing of the results of its survey in the newspapers constitutes the making of an expenditure in connection with a federal election.

WHEREFORE, Respondent agrees:

V. Respondent violated 2 U.S.C. § 441b(a) by making an expenditure in connection with a federal election.

VI. Respondent contends that it did not knowingly and willfully violate 2 U.S.C. § 441b(a).

VII. Respondent contends its intent of publishing results of its survey was to educate the public on the positions of candidates on issues of importance.

VIII. Respondent agrees that it shall not undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq.

IX. Respondent will pay a civil penalty to the Treasurer of the United States in the amount of one hundred dollars (\$100), pursuant to 2 U.S.C. § 437g(a)(5)(A).

GENERAL CONDITIONS

X. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it

81040302118

may institute a civil action for relief in the United States District Court for the District of Columbia.

X1. It is agreed that respondent shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirement contained in this agreement and to so notify the Commission.

September 17, 1981
Date

for Charles N. Steele
General Counsel
Federal Election Commission

Aug. 27, 1981
Date

Family/Life League

BY: Joan Solms
ITS: Director -

81040302119

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Family/Life League)

MUR 1183

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on September 17, 1981, the Commission decided by a vote of 6-0 to take the following actions regarding MUR 1183:

1. Accept the conciliation agreement and the \$100 civil penalty as settlement of this matter.
2. Close the file.
3. Send the letter, as attached to the General Counsel's memorandum dated September 14, 1981, to the respondent's counsel, Patrick Trueman.

Commissioners Aikens, Harris, McGarry, Reiche, Thomson and Tiernan voted affirmatively in this matter.

Attest:

9/17/81

Date

Jody A. Custer

for Marjorie W. Emmons
Secretary of the Commission

Received in Office of the Commission Secretary: 9-14-81, 5:33
Circulated on 48 hour vote basis: 9-15-81, 11:00

81040302120

September 14, 1981

MEMORANDUM TO: Marjorie W. Emmons
FROM: Phyllis A. Kayson
SUBJECT: MUR 1183

Please have the attached Memo to the Commission
distributed to the Commission on a 48 hour tally basis.
Thank you.

Attachment

cc: Thedford

81010302121

SENSITIVE



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

81 SEP 14 P 5: 33

September 14, 1981

MEMORANDUM TO: The Commission

FROM: Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel *KAG*

SUBJECT: MUR 1183 Conciliation Agreement

Attached is a conciliation agreement which has been signed by the director of the Family/Life League, Joan Solms.

The agreement contains no changes from the agreement previously approved by the Commission on August 10, 1981. The \$100 civil penalty imposed by the Commission was submitted by check to the Commission with the signed conciliation agreement (see attachments 1 and 2).

The Office of the General Counsel recommends the Commission accept the conciliation agreement and the \$100 civil penalty as settlement of this matter, close the file, and send the attached letter to the respondent's counsel, Patrick Trueman (see attachment 3).

Attachments:

- 1 -Signed Conciliation Agreement
- 2 -Civil Penalty Check
- 3 -Proposed Letter to Counsel

81090302122

July 31, 1981

Case # 5435
SEP 11 12:21

In the Matter of
Family/Life League

MUR 11

SEP 11 4:38

GENERAL COUNSEL

CONCILIATION AGREEMENT

This matter having been initiated by a signed, sworn, and notarized complaint by Marcena W. Love, an investigation having been conducted, and probable cause to believe having been found that Family/Life League ("Respondent") violated 2 U.S.C. § 441b(a) by making an expenditure in connection with a federal election.

NOW, THEREFORE, the Commission and Respondent, having duly entered into conciliation pursuant to 2 U.S.C. § 437g(a) (4)(A)(i) do hereby agree as follows:

I. The Commission has jurisdiction over the Respondent and the subject matter of this proceeding.

II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondent enters voluntarily into this Agreement with the Commission.

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

1. Respondent, Family/Life League, is a non-profit corporation.

2. Respondent conducted a survey of the three candidates who were running for the U.S. House of Representatives in the Illinois special election on December 11, 1979.

Attachment 1 pg 2

81040302123

3. Respondent published the results of its survey in three local newspapers. The cost of publishing the survey was \$599.14.

4. Respondent's publishing of the results of its survey in the newspapers constitutes the making of an expenditure in connection with a federal election.

WHEREFORE, Respondent agrees:

V. Respondent violated 2 U.S.C. § 441b(a) by making an expenditure in connection with a federal election.

VI. Respondent contends that it did not knowingly and willfully violate 2 U.S.C. § 441b(a).

VII. Respondent contends its intent of publishing results of its survey was to educate the public on the positions of candidates on issues of importance.

VIII. Respondent agrees that it shall not undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq.

IX. Respondent will pay a civil penalty to the Treasurer of the United States in the amount of one hundred dollars (\$100), pursuant to 2 U.S.C. § 437g(a)(5)(A).

GENERAL CONDITIONS

X. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it

81040302124

may institute a civil action for relief in the United States District Court for the District of Columbia.

X1. It is agreed that respondent shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirement contained in this agreement and to so notify the Commission.

Date

Charles N. Steele
General Counsel
Federal Election Commission

81040302125

Date Aug. 27, 1981

Family/Life League

BY: _____

ITS: _____

Joan Solms
Director

81040302126

FAMILY / LIFE LEAGUE
P. O. BOX 203
RIVER FOREST, ILL. 60305

746

70-142
719

PAY
TO THE
ORDER OF

Treasurer of the United States \$ *100.00*
One hundred and 00/100 DOLLARS



OAK PARK TRUST & SAVINGS BANK
VILLAGE MALL PLAZA
OAK PARK, ILLINOIS 60301

FOR

Dr John A Kelly
Patricia A Corti

⑈000746⑈ ⑆1071901426⑈

0311 857⑈

Attachment 2 pgs



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Patrick A. Trueman
230 North Michigan Avenue
Suite 915
Chicago, Illinois 60601

RE: MUR 1183

Dear Mr. Trueman:

On , 1981, the Commission accepted the conciliation agreement signed by Joan Solms and the \$100 civil penalty check as settlement of a violation of 2 U.S.C. § 441b(a), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become a part of the public record, please advise us in writing.

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

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Enclosure:
Conciliation Agreement

Attachment 3 pg 6

81040302127

81040302128

FAMILY / LIFE LEAGUE
P. O. BOX 293
RIVER FOREST, ILL. 60305

746

70-142
719

PAY
TO THE
ORDER OF

Treasurer of the United States \$ 100.00
One hundred and 00/100 DOLLARS



OAK PARK TRUST & SAVINGS BANK
VILLAGE MALL PLAZA
OAK PARK, ILLINOIS 60301

FOR

Dr John A Kelly
Patricia A Corti

⑈000746⑈ ⑆071901426⑆

0311 857⑈

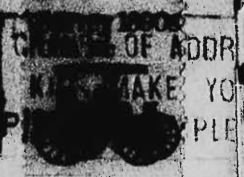
810423219

FAMILY LIFE LEAGUE

P.O. BOX 293 RIVER FOREST, ILLINOIS 60093



RECEIVED



Charles N. Steele
General Counsel
Federal Elections Commission
Washington, D.C. - 20463



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 15, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Patrick Trueman
230 N. Michigan
Suite 515
Chicago, Illinois 60601

Re: MUR 1183

Dear Mr. Trueman:

Based on a complaint filed with the Commission on February 25, 1980, the Commission determined on April 15, 1980, that there was reason to believe that your client, Family/Life League, may have violated the Federal Election Campaign Act of 1971, as amended, specifically 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 settlement of this matter through informal conciliation prior to a finding of probable cause to believe, if you so desire.

81040302130

Letter to: Patrick Trueman
Page Two

Should you have any questions, please contact Judy
Thedford at (202) 523-4057.

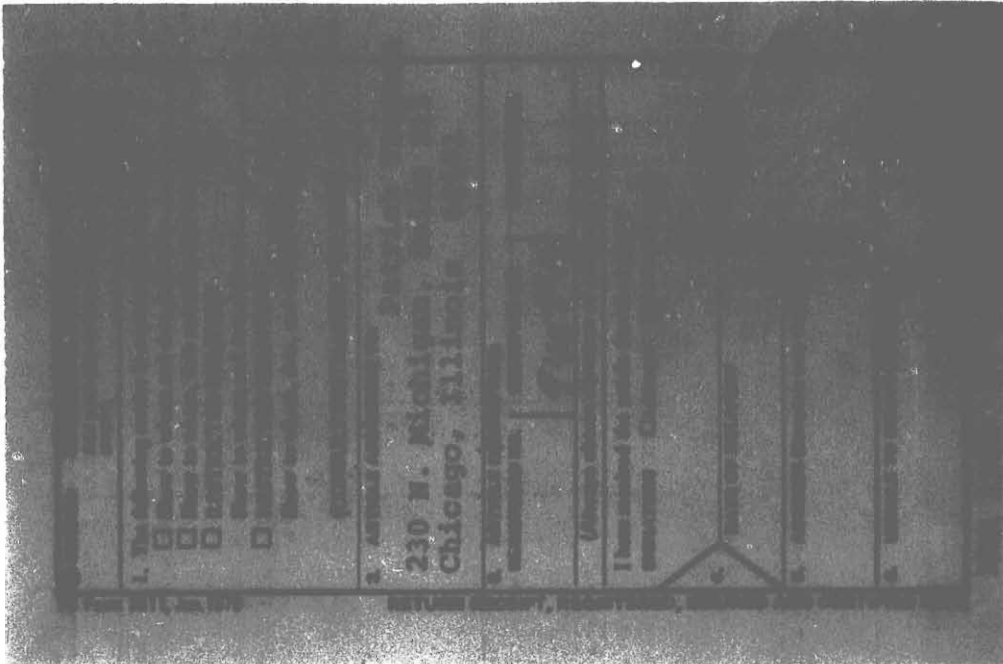
Sincerely,



Charles N. Steele
General Counsel

Enclosure
Brief

81040302131



230 N. Michigan
Chicago, Illinois

August 15, 1980

MEMORANDUM TO: Marjorie W. Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 1183

Please have the attached Memo and brief distributed
to the Commission on an informational basis. Thank you.

81040302132



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

80 AUG 15 P 1: 43

August 15, 1980

MEMORANDUM TO: The Commission

FROM: Charles N. Steele
General Counsel *CS*

SUBJECT: MUR #1183

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 a probable cause to believe was mailed August 15, 1980. Following receipt of the respondent's reply to this notice, this Office will make a further report to the Commission

Attachments:

Brief
Letter to Respondent

8104030213

BEFORE THE FEDERAL ELECTION COMMISSION

August 1, 1980

In the Matter of
Family/Life League

)
)
)

MUR 1183

GENERAL COUNSEL'S BRIEF

I. BACKGROUND

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This matter was initiated by a complaint filed by Marcena W. Love on February 25, 1980. The complainant submitted a copy of an advertisement paid for by Family/Life League ("FLL") which showed the results of a survey on pro-life legislation of three candidates in the 10th Congressional district of Illinois. Ms. Love alleged a violation of the Internal Revenue Code by FLL, a non-profit corporation, for publishing the survey.

In accordance with the enforcement procedures, the respondent, Family/Life League, was notified of the filing of the complaint and given the opportunity to demonstrate that no action should be taken. On March 17 and March 20, 1980, Director Joan Solms submitted two letters which stated the name and address of Mr. Trueman, the Counsel representing the respondent in this matter. On March 27, 1980, Mr. Trueman called the Commission stating that he would file a response to the complaint. No response was submitted.

On April 15, 1980, the Commission found reason to believe that FLL violated 2 U.S.C. § 441b(a) for making an expenditure in connection with a federal election. The reason to believe notification and interrogatories were sent to respondent's counsel on April 16, 1980.

II. EVIDENCE

On April 23, 1980, Mr. Trueman submitted answers to the interrogatories. The responses indicated that:

- (1) FLL is incorporated;
- (2) the survey of the three candidates cost FLL \$2.00;
- (3) the advertisement appearing in the Suburban Trib North Shore cost \$599.14;
- (4) the advertisement appeared in additional newspapers as follows: Suburban Tribune \$252.84, Des Plaines Journal \$109.30 and Des Plaines Publications \$156.00;
- (5) no other advertisements reflecting the results of the survey were published, and,
- (6) the corporation did not make any other payments in connection with the Illinois Special election.

Counsel stated in his April 23 response that the answers to the interrogatories were "temporary" and that he would respond further at a later date.

On June 5, 1980, additional interrogatories were sent to respondent's counsel. On June 6, 1980, counsel submitted a letter stating that the "temporary answers" to the Commission's April 16, 1980, interrogatories should now be considered final.

81040302135

Furthermore, he stated that he would review the relevant sections of the United States Code, review his findings with the Board of Directors of Family/Life League, and respond further to the matter.

On June 17, 1980, counsel submitted responses to the June 5, 1980, interrogatories. The responses indicated that:

- (1) Family/Life League is a non-profit corporation;
- (2) Family/Life League has never endorsed or supported any candidate or political party;
- (3) Family/Life League is not affiliated with any candidate or political party, and
- (4) Family/Life League's December 10, 1979, advertisement was not intended to favor one candidate over the other, or intended to advocate the election of a certain candidate.

No further response has been submitted by counsel.

III. LEGAL ANALYSIS

As the evidence indicates, FLL, an incorporated, non-profit organization, published an advertisement reflecting the results of a survey of three congressional candidates and their positions on pro-life legislation in three local newspapers. The cost of the survey and the advertisements totalled approximately \$601.99. Such activity by the corporation appeared to violate 2 U.S.C. § 441b(a) to which reason to believe was found.

The regulations at 11 C.F.R. § 114.4 define certain activities which may be performed by a corporation and not violate

81040302136

2 U.S.C. § 441b(a). Specifically, 11 C.F.R. § 114.4(c)(3) permits a corporation to distribute brochures describing candidates and their positions if the following criteria are met:

- (1) the materials do not favor one candidate or political party over another, and
- (2) the materials are obtained from a civic or other non-profit organization which does not endorse, support, or is affiliated with any candidate or political party.

With regard to the second criteria, FLL itself is an incorporated non-profit organization which does not endorse, support or is affiliated with any candidate or political party. In AO 1980-45, the Commission determined that a not-for-profit corporation could conduct a voter registration drive aimed at the general public without a corporate sponsor. AO 1980-45 was based on 11 C.F.R. § 114.4(d) which contained a similar requirement as § 114.4(c)(3)(ii) in that it required a corporation to jointly sponsor a registration drive with a civic, non-profit organization which did not support, endorse, or is affiliated with any candidate or political party. As the corporation itself was a non-profit non-partisan organization, the Commission decided that a separate corporate sponsor was not needed. Therefore, in this situation it would follow that FLL, a non-profit corporation could publish the results of its survey without another corporate entity.

81040302137

81040302138

The first criteria, however, must also be met for the FLL advertisement to qualify as an exempted activity. Specifically, the advertisement must not favor one candidate or political party over another. It is the opinion of the General Counsel that (1) the headline on the advertisement which reads, "Is Your Congressional Candidate Pro Family?", (2) the closing line which states, "If any of these issues are important to your family, we urge you to vote on Tuesday, December 11 in the Special election for Congressman of the 10th district" and (3) the phrasing of the questions appear to be favoring the pro-life candidate and encourage the voters to vote for the candidate who will support pro-life legislation referred to in the survey questions (see Attachment I).


Therefore, it is recommended that the advertisement paid for by FLL does not qualify as an exempted activity under 11 C.F.R. § 114.4(c)(3) and would constitute an expenditure made in connection with a federal election in violation of 2 U.S.C. § 441b(a).

IV. RECOMMENDATION

It is recommended that the Commission find probable cause to believe that Family/Life League violated 2 U.S.C. § 441b(a).

Date

14 August 1980


Charles N. Steele
General Counsel

Attachment:

I-Advertisement by FLL

Fuller said he will put his organization behind Bowman and Bloomenthal, the choice of 40th Ward committeeman Neil Hartigan. Fuller predicted that the portion of south Evanston in the 11th District can produce

Preston had so much of the can not support but was residents in the 10th Ward when he said with Byrdington and Thompson's vote to eliminate the medicine sales tax on food. Preston, the ward member, has been in a battle between the 10th Ward committeeman Neil Hartigan and Preston's predecessor, Brady, who is seen to succeed Hartigan.

Suburban Trib

Michael F. Malheiro
General Manager
Charles E. Hayes
Editor

Kenneth A. Knox
Managing Editor
Barbara L. Sutton
News Editor

Patrick T. Reardon
North Shore Editor
(298-6200)

Roger S. Saunders
Advertising Director

Telephones
Newsroom, Classified
and Display
Advertising

298-6200

Sports 887-4020

Feature sections 887-4963

Editorial and Advertising
Office 2720 Des Plaines
Av., Suite 60
Des Plaines, Ill. 60018

Suburban Trib
North Shore is published by Arun Publications Corporation, a subsidiary of Chicago Tribune Company, 765 N. York Rd., Hinsdale, Ill. 60521 on Monday, Wednesday, and Friday.

Distributed with Chicago Tribune in Evanston, Glenview, Glenview Kenilworth, Lincolnwood, Morton Grove, Niles, Northbrook, Northfield, Skokie, Wilmette, and Winnetka.

General office: 887-4000. Printed by Merrill Printing Company, Hinsdale, Ill. 60521.

ARUN PUBLICATIONS
NEW AND PARK
HILLS

OPENING FOR LUNCHEON
Wednesday, Jan. 2, 1980
A Perfect Setting For Your
Next Luncheon
From 4 to 4:00 of Your
Dearest Friends
Call Jill for Party Information
432-1200

New Year's Eve
Reservations
Now Being
Taken

Don't Leave Home without it.

IS YOUR CONGRESSIONAL CANDIDATE PRO-FAMILY?

A QUESTIONNAIRE TO REVEAL THE CANDIDATES
POSITION ON PRO-FAMILY ISSUES RECEIVED THE
FOLLOWING RESPONSE.

| | Republican | Democrat |
|--|--------------------|--------------------------------------|
| 1. Will you support legislation that either prohibits or abolishes Federal laws and guidelines which re-empt the Rights and Responsibilities of parents over their minor children without due process of law regarding their religious, medical, educational, and social well-being? | John Nimrod YES | Robert Weinberger DID NOT RESPOND |
| 2. Will you support the withdrawal of Federal funds and programs involving Family Planning and Social Engineering? | YES | DID NOT RESPOND |
| 3. Will you support the Family Protection Act, designed to increase family responsibility and control and spending? | YES | DID NOT RESPOND |

IF ANY OF THESE ISSUES ARE IMPORTANT TO YOUR FAMILY, WE URGE YOU TO VOTE ON TUESDAY, DEC. 11 IN THE SPECIAL ELECTION FOR CONGRESSMAN OF THE 10TH DISTRICT.

FAMILY/LIFE LEAGUE
BOX 293 RIVER FOREST, ILL. 60305
JOAN SOLMS, DIRECTOR



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 15, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Patrick Trueman
230 N. Michigan
Suite 515
Chicago, Illinois 60601

Re: MUR 1183

Dear Mr. Trueman:

Based on a complaint filed with the Commission on February 25, 1980, the Commission determined on April 15, 1980, that there was reason to believe that your client, Family/Life League, may have violated the Federal Election Campaign Act of 1971, as amended, specifically 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.

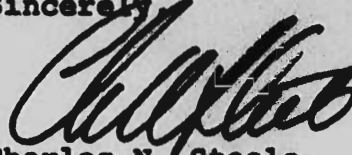
A finding of probable cause to believe requires that the Office of General Counsel attempt for a period of not less than thirty, but not more than ninety days to settle this matter through a conciliation agreement. This does not preclude settlement of this matter through informal conciliation prior to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

81040302140

Letter to: Patrick Trueman
Page Two

Should you have any questions, please contact Judy
Thedford at (202)523-4057.

Sincerely,



Charles N. Steele
General Counsel

Enclosure
Brief

81040302141



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE *MWC*
FROM: MARJORIE W. EMMONS/MARGARET CHANEY *mc*
DATE: JULY 22, 1980
SUBJECT: MUR 1183 - Interim Investigative Report #2,
dated 7-10-80; Signed 7-11-80; Received
in OCS 7-14-80, 1:48

The above-named document was circulated to the
Commission on a no-objection basis at 11:00, July 15, 1980.

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

81040302142

July 14, 1980

MEMORANDUM TO: Marjorie W. Emmons

FROM: Elissa T. Garr

SUBJECT: MUR 1183

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

81040302143

BEFORE THE FEDERAL ELECTION COMMISSION

July 10, 1980

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY
80 JUL 14 2:14 PM

In the Matter of
Family/Life League

)
)
)

MUR 1183

INTERIM INVESTIGATIVE REPORT #2

On June 3, 1980, Patrick Trueman, counsel for Family/Life League, submitted a letter stating that the "temporary answers" to the Commission's April 16, 1980 interrogatories should now be considered final. Furthermore, he stated that he will review the relevant sections of the United States Code, review his findings with the Board of Directors of Family/Life League, and will further respond to the matter.

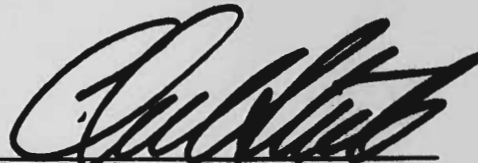
On June 17, 1980, counsel submitted responses to the June 5, 1980 interrogatories. The responses indicated that:

- 1) Family/Life League is a non-profit corporation;
- 2) Family/Life League has never endorsed or supported any candidate or political party;
- 3) Family/Life League is not affiliated with any candidate or political party, and
- 4) Family/Life League's December 10, 1979, advertisement was not intended to favor one candidate over the other, or intended to advocate the election of certain candidates.

81040302144

These responses are currently being reviewed. After a review of the matter, a Report will be presented to the Commission.

11 July 1950
DATE


CHARLES N. STEELE
GENERAL COUNSEL

81040302145

RECEIVED

600
1716
30 JUN 19 AM 11:46

TELEPHONE 262-5200

PATRICK A. TRUEMAN
ATTORNEY AT LAW

230 NORTH MICHIGAN AVENUE
SUITE 515
CHICAGO, ILLINOIS 60601

June 17, 1980

008562

Charles N. Steele
General Counsel
Federal Election Commission
Washington DC 20463

Re: MUR 1183

Dear Mr. Steele:

I am in receipt of your letter of June 5, 1980 and the interrogatories addressed to the Family Life League. The answers to the interrogatories are as follows:

1. Yes.
2. No.
3. No.
4. No.
5. No.
- 6a. No.
- 6b. No.

Sincerely,



Patrick A. Trueman

PAT:VR

cc: Family Life League

28:18 61NOC 00

7BEN 12 1203NEO
DE 12 12

81040302146

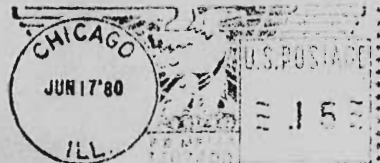
8104103102
PATRICK A. TRUEMAN

LAWYER

280 NORTH MICHIGAN AVENUE

SUITE 818

CHICAGO, ILLINOIS 60601



Charles N. Steele
General Counsel
Federal Election Commission
Washington DC 20463

PATRICK A. TRUEMAN
ATTORNEY AT LAW

230 NORTH MICHIGAN AVENUE
SUITE 215
CHICAGO, ILLINOIS 60601

TELEPHONE 292-5886

JUN 1980

Rec # 1614

908367

JUN 10 4 21 PM '80

RECEIVED
GENERAL COUNSEL

June 6, 1980

Mr. Robert O. Tiernan, Chairman
Federal Elections Commission
Washington, D.C. 20463

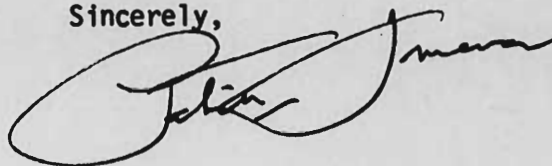
Re: MUR 1183

Dear Mr. Tiernan:

On April 23, 1980 I submitted "temporary answers" to your Interrogatories of Family Life League. These answers may now be considered final.

I have now had the opportunity to fully review the appropriate sections of the United States Code which you allege my client has violated and I will be reviewing my findings with the Board of Directors of Family Life League shortly. Thereafter I will send a further response to you regarding this matter.

Sincerely,



Patrick A. Trueman

PAT:ac
cc: Family Life League

81040302149

810103 RECEIVED

'80 JUN 9 AM 11 38

Patrick A. Trueman
230 W. Michigan
Chicago, IL 60601



Mr. Robert O. Tiernan, Chairman
Federal Elections Commission
Washington, D.C. 20463

05120304018

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

● 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:
Mr. Patrick J. Truman
Chicago, Illinois

3. ARTICLE DESCRIPTION:
REGISTERED NO. CERTIFIED NO. INSURED NO.
6705nb

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
Virginia Renter

4. DATE OF DELIVERY
6-9-80

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS



1183 *Shedford* ☆GPO 1977-0-249-605



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 5, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Patrick A. Trueman
230 North Michigan Avenue
Suite 515
Chicago, Illinois 60601

RE: MUR 1183

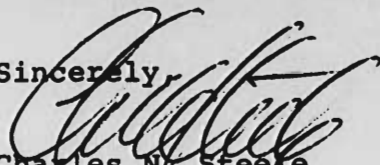
Dear Mr. Trueman:

In furtherance of its investigation of the Family/Life League, the Federal Election Commission has issued the enclosed interrogatories to your client for response. Please submit the answers to the attached interrogatories to the Commission within ten days of your receipt of this letter.

Furthermore, your letter dated April 23, 1980, indicated that the responses to the interrogatories dated April 16, 1980 were temporary and that further correspondence would be submitted to the Commission upon your return to Chicago. Please note that absent any additional information from you, the Office of the General Counsel will have to decide what further action to be taken solely on the basis of information available to it.

If you have any questions, please contact Judy Thedford at 202/523-5071.

Sincerely,


Charles N. Steele
General Counsel

Enclosure:
Interrogatories

81040302151



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Patrick A. Trueman
230 North Michigan Avenue
Suite 515
Chicago, Illinois 60601

RE: MUR 1183

Dear Mr. Trueman:

In furtherance of its investigation of the Family/Life League, the Federal Election Commission has issued the enclosed interrogatories to your client for response. Please submit the answers to the attached interrogatories to the Commission within ten days of your receipt of this letter.

Furthermore, your letter dated April 23, 1980, indicated that the responses to the interrogatories dated April 16, 1980 were temporary and that further correspondence would be submitted to the Commission upon your return to Chicago. Please note that absent any additional information from you, the Office of the General Counsel will have to decide what further action to be taken solely on the basis of information available to it.

If you have any questions, please contact Judy Thedford at 202/523-5071.

Sincerely,

Charles N. Steele
General Counsel

Enclosure:
Interrogatories

81040302152
JH
6-4-80

**Family/Life League
Interrogatories**

1. Family/Life League's responses to the April 16, 1980 interrogatories indicated that Family/Life League was incorporated under the laws of Illinois. Is Family/Life League a non-profit corporation?
2. Has Family/Life League ever endorsed or supported any candidate? If so, please identify the candidate(s).
3. Has Family/Life League ever endorsed or supported any political party? If so, name the political party(ies).
4. Is Family/Life League affiliated with any candidate? If so, identify the candidate(s).
5. Is Family/Life League affiliated with any political party? If so, identify the political party(ies).
6. What was the purpose of the advertisement which appeared in the Suburban Trib North Shore on December 10, 1979?
 - a) Was the advertisement intended to favor one candidate over the other?
 - b) Was the advertisement intended to advocate the election of a certain candidate? If so, please identify the candidate(s).

81040302153

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Family /Life League)

MUR 1183

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on June 3, 1980, the Commission approve by a vote of 5-0 the letter and interrogatories to be sent to Partick Trueman, counsel for Family/life League, (Attachments to the Memorandum to the Commission dated May 29, 1980).

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

Attest:

6/3/80

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

Received in Office of the Commission Secretary: 5-29-80, 3:41
Circulated on 48 hour vote basis: 5-30-80, 2:00

81040302154

May 29, 1980

MEMORANDUM TO: Marjorie W. Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 1183

Please have the attached Memo distributed to the
Commission on a 48 hour tally basis. Thank you.

81040302155



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

80 MAY 29 7:41

May 29, 1980

MEMORANDUM TO: The Commission

FROM: Charles N. Steele
General Counsel *CS*

SUBJECT: MUR 1183

Attached for the Commission's approval are letters and interrogatories to be sent to Patrick Trueman, counsel for Family/Life League, in furtherance of the Commission's investigation of this matter.

81040302156



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Patrick A. Trueman
230 North Michigan Avenue
Suite 515
Chicago, Illinois 60601

RE: MUR 1183

Dear Mr. Trueman:

In furtherance of its investigation of the Family/Life League, the Federal Election Commission has issued the enclosed interrogatories to your client for response. Please submit the answers to the attached interrogatories to the Commission within ten days of your receipt of this letter.

Furthermore, your letter dated April 23, 1980, indicated that the responses to the interrogatories dated April 16, 1980 were temporary and that further correspondence would be submitted to the Commission upon your return to Chicago. Please note that absent any additional information from you, the Office of the General Counsel will have to decide what further action to be taken solely on the basis of information available to it.

If you have any questions, please contact Judy Thedford at 202/523-5071.

Sincerely,

Charles N. Steele
General Counsel

Enclosure:
Interrogatories

81040302157

**Family/Life League
Interrogatories**

1. Family/Life League's responses to the April 16, 1980 interrogatories indicated that Family/Life League was incorporated under the laws of Illinois. Is Family/Life League a non-profit corporation?
2. Has Family/Life League ever endorsed or supported any candidate? If so, please identify the candidate(s).
3. Has Family/Life League ever endorsed or supported any political party? If so, name the political party(ies).
4. Is Family/Life League affiliated with any candidate? If so, identify the candidate(s).
5. Is Family/Life League affiliated with any political party? If so, identify the political party(ies).
6. What was the purpose of the advertisement which appeared in the Suburban Trib North Shore on December 10, 1979?
 - a) Was the advertisement intended to favor one candidate over the other?
 - b) Was the advertisement intended to advocate the election of a certain candidate? If so, please identify the candidate(s).

81040302158



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE *MWE*
FROM: MARJORIE W. EMMONS/MARGARET CHANEY *me*
DATE: MAY 12, 1980
SUBJECT: MUR 1183 - Interim Investigative Report #1,
dated 5-6-80; Signed 5-8-80; Received
in OCS 5-9-80, 10:24

The above-named document was circulated to the
Commission on a 24 hour no-objection basis at 2:00, Friday,
May 9, 1980.

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

81040302159

May 9, 1960

MEMORANDUM TO: Marjorie W. Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 1183

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

81040302160

RECEIVED
FEDERAL ELECTION COMMISSION
BEFORE THE FEDERAL ELECTION COMMISSION

May 6, 1980

80 MAY 9 AID: 24

In the Matter of)
Family/Life League)

MUR 1183

INTERIM INVESTIGATIVE REPORT #1

On April 29, 1980, counsel for the Family/Life League, Patrick A. Trueman, submitted temporary responses to the interrogatories issued to his client.

From Mr. Trueman responses, it appears that:

1) Family/Life League is a corporation, incorporated in the state of Illinois;

2) the cost of the survey of the candidates involved in the December 11, 1979 special election in Illinois cost the corporation \$2.00;

3) the advertisement submitted by ~~the complainant~~ cost \$599.14;

4) the advertisement appeared in additional newspapers as follows: Suburban Tribune, \$252.84, Des Plaines Journal, \$190.30, and Des Plaines Publications, \$156.00.

5) no other advertisements reflecting the results of the survey were published; and


6) the corporation did not make any other payments in connection with the Illinois special election.

Mr. Trueman stated that he will write in approximately ten days and submit answers under oath if necessary.

81040302161

Upon receipt of Mr. Trueman's response, a report will be presented to the Commission.

Date: 8 May 1980



Charles N. Steele
General Counsel

81040302162

28 APR 1980

PATRICK A. TRUUMAN
ATTORNEY AT LAW

230 NORTH MICHIGAN AVENUE
SUITE 818
CHICAGO, ILLINOIS 60601

RECEIVED
CCC 1184
80 APR 29 AM 8:29
TELEPHONE 262-5266

April 23, 1980

807774

Robert O. Tiernan, Chairman
Federal Election Commission
Washington DC 20463

Re: MUR 1183

Dear Mr. Tiernan:


On April 16, 1980 you sent six interrogatories to me directed to the Family Life League. I am unable to meet personally with my client to obtain answers to these and therefore I am not submitting them under oath at this time. These answers should thus be considered temporary until I write you in the near future.

The temporary answers to your interrogatories are as follows:

- 1) Yes, State of Illinois.
- 2) Less than \$2.00.
- 3) \$599.14.
- 4a) Yes.
 - b) Suburban Tribune, \$252.84, Des Plaines Journal, \$190.30, Des Plaines Publications, \$156.00.
- 5a) No.
- 6) No.

I am leaving town for ten days and I will further review this matter upon my return to Chicago. Very shortly thereafter I will correspond with you and, if necessary, I will obtain the above answers under oath.

Sincerely,

50:6 v 62 MAY 06 1980


TESTED 178939 Patrick A. Trueman

PAT:VR

81040302163

CHICAGO, ILLINOIS 60601

4-6103-0515

8:28 AM APR 29 1960

RECEIVED

CHICAGO. 7
PM
23 APR
1952

RECEIVED

~~'80 APR 23 AM 8:29~~

**Robert O. Tiernan, Chairman
Federal Election Commission
Washington DC 20463**

24 APR 1980

PATRICK A. TRUEMAN
ATTORNEY AT LAW

RECEIVED

00-1132

'80 APR 25 AM 8:41

TELEPHONE 265-2000

230 NORTH MICHIGAN AVENUE
SUITE 515
CHICAGO, ILLINOIS 60601

April 18, 1980

807394

Robert O. Tiernan, Chairman
Federal Election Commission
Washington DC 20463

Re: Mur 1183

Dear Mr. Tiernan:

I am in receipt of your letter of April 16, 1980 regarding the alleged violation of Family/Life League. I have forwarded the interrogatories to my client and will be contacting you very shortly.

Sincerely,



Patrick A. Trueman

PAT:VR

80 APR 25 9:21

RECEIVED
GENERAL COUNSEL

81040302165

8104030021006
PATRICK A. TRUAMAN

ATTORNEY

250 NORTH MICHIGAN AVENUE

SUITE 515

CHICAGO, ILLINOIS 60601

'80 APR 22 AM

APR 18 '80

Robert O. Tiernan, Chairman
Federal Election Commission
Washington DC 20463



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 16, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Patrick Trueman
230 N. Michigan
Suite 515
Chicago, Illinois 60601

Re: MJR 1183

Dear Mr. Trueman:

The Federal Election Commission notified your client, Family/Life League, on March 4, 1980, of a complaint which alleges that your client may have violated the Federal Election Campaign Act of 1971, as amended, (the "Act"). A copy of the complaint was forwarded to your client at that time.

Upon further review of the allegation contained in the complaint, the Commission, on April 15, 1980, determined that there is reason to believe that the Family/Life League violated 2 U.S.C. § 441b(a). Specifically, it appears that the Family/Life League's payment of a survey and advertisement published in the December 10, 1979 Suburban Trib North Shore was made in connection with the Congressional special election on December 11, 1979 and constituted the making of expenditures as defined by 2 U.S.C. § 441b(b)(2). Expenditures by the Family/Life League, a corporation, are in violation of 2 U.S.C. § 441b(a). You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

As of this date, we have received no written response from you in connection with this matter. Please submit answers to the enclosed questions within ten days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against your client, the Commission may find probable cause to believe that a violation has occurred, and proceed with formal conciliation. Of course, this does not preclude

81040302167

Page 2
Family/Life League

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.

If you have any questions, please contact Judy Thedford, at 202/523-5071.

Sincerely,


ROBERT O. TIERNAN
Chairman

Enclosure:
Interrogatories

8
9
1
2
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3
0
0
1
8

7/18/83 Jut

| | |
|--|--|
| 1. ARTICLE DESCRIPTION: REGISTERED NO. 444556 CERTIFIED NO. INSURED NO. | |
| 2. ADDRESS: (Complete only if registered) Mr. Robert O. Tiernan 930 N. Michigan Chicago, Illinois 60611 | |
| 3. I have received the article described above. INITIALS <input type="checkbox"/> Address <input type="checkbox"/> Authorized agent | |
| 4. (Always check delivery of address or agent) | |
| 5. UNABLE TO DELIVER BECAUSE: | |
| 6. The following for fee is requested (check one): <input type="checkbox"/> Show in which city and state delivered. <input type="checkbox"/> Show in which city, state and address of delivery. <input type="checkbox"/> RESTRICTED DELIVERY Show in which city and state delivered. <input type="checkbox"/> RESTRICTED DELIVERY Show in which city, state and address of delivery \$ (CONSULT POSTMASTER FOR FEES) | |

APR 1980
CHICAGO
INITIALS

INTERROGATORIES
Family/Life League

Please submit the following information in connection with the advertisement appearing in the December 10, 1979 Suburban Trib North Shore:

- 1) Is the Family/ Life League a corporation?
- 2) State the cost of the survey.
- 3) State the cost of the advertisement.
- 4) a) Did this advertisement appear in any other newspaper or flyer?
b) If so, list each newspaper or flyer in which the advertisement appeared and state the cost of each advertisement.
- 5) a) Were the results of Family/Life League's survey published in any other newspaper or flyer?
b) If so, list each newspaper or flyer in which the results of the survey appeared, state the cost of advertising the survey in each newspaper or flyer, and submit a copy of each survey advertised.
- 6) Did the Family/Life League make any other payment in connection with the December 11, 1979 special election?

81040302169

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Family/Life League)

MUR 1183

CERTIFICATION

I, Marjorie W. Emmons, Recording Secretary for the Federal Election Commission's Executive Session on April 15, 1980, do hereby certify that the Commission decided by a vote of 4-1 to take the following actions in MUR 1183:

1. Find reason to believe that the Family/Life League violated 2 U.S.C. §441b(a); and
2. Approve and send the letter and questions to Patrick Trueman, counsel for Family/Life League, as attached to the General Counsel's First Report in this matter.

Commissioners Harris, McGarry, Reiche, and Tiernan voted affirmatively for these actions; Commissioner Friedersdorf dissented; Commissioner Aikens abstained on the vote.

Attest:

4-15-80

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

81040302170



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO: CHARLES STEELE

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

DATE: APRIL 10, 1980

SUBJECT: OBJECTION - MUR 1183 - First General Counsel's
Report dated 4-7-80; Received in
OCS 4-7-80, 1:53

The above-named document was circulated on a 48 hour
vote basis at 11:00, April 8, 1980.

Commissioner McGarry submitted an objection at 11:44,
April 10, 1980, thereby placing MUR 1183 on the Executive
Session Agenda for Tuesday, April 15, 1980.

81040302171

April 7, 1980

MEMORANDUM TO: Marjorie W. Emmons

From: Elissa T. Garr

SUBJECT: MUR 1183

Please have the attached First GC Report distributed to the Commission on a 48 hour tally basis. Thank you.

81040302172

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

4-7-80

MUR # 1183

DATE COMPLAINT RECEIVED
BY OGC 2-25-80

STAFF MEMBER
J. Thedford

COMPLAINANT'S NAME: Marcena W. Love

RESPONDENT'S NAME: Family/Life League

RELEVANT STATUTE: 2 U.S.C. §441b(b)(2), §441b(a)

INTERNAL REPORTS CHECKED: None

FEDERAL AGENCIES CHECKED: None

80 APR 7 11:53

RECEIVED
CHIEF OF THE
COMMISSION SECRETARY

SUMMARY OF ALLEGATIONS

The complainant submitted a copy of an advertisement paid for by the Family/Life League, a registered Illinois Not-for-Profit corporation, which showed the results of a survey of candidates for the 10th Congressional District of Illinois; and stated that the Internal Revenue Service Code prohibits a Not-for-Profit corporation from publishing surveys of positions taken by candidates in an election.

FACTUAL AND LEGAL ANALYSIS

While the complainant, Ms. Love, alleges a violation of the Internal Revenue Code by the respondent, Family/Life League, it appears that publication of the advertisement by the respondent is a violation of the Federal Election Campaign Act, as amended, specifically 2 U.S.C. §441b(a).

The advertisement which appeared in the December 10, 1979 Suburban Trib North Shore showed the results of a survey of Congressional candidates involved in a special election in Illinois' 10th Congressional district. The headline read,

"IS YOUR CONGRESSIONAL CANDIDATE PRO-FAMILY" and listed below were the responses to three questions from candidates John Nimrod, John Porter, and Robert Weinberger. The ad urged one to vote if these issues were important to the voter's family. The name, address, and director of the Family/Life League appeared on the bottom of the advertisement. (See Attachment I).

It is the opinion of the Office of the General Counsel that the above described advertisement was made in connection with the special election in Illinois. Therefore, the cost of the survey and advertisement by the Family/Life League constitutes the making of expenditures as defined by 2 U.S.C. §441b(b)(2). Such activity by the Family/Life League, a corporation, is in violation of 2 U.S.C. §441b(a) which prohibits corporations from making any expenditure in connection with federal elections.

The Family/Life League was notified of the filing of the complaint on March 4, 1980, and given an opportunity to demonstrate that no action should be taken against them. On March 17, 1980 and March 20, 1980, the attached letters were received from the Family/ Life League stating that the notice and complaint had been forwarded to their attorney, Mr. Patrick Trueman, for response. (See Attachments II & III). Mr. Trueman phoned the Commission on March 27, 1980 and stated that his response would be mailed shortly.

As the fifteen days for responding have expired and no response to the allegation has been received, the Office of the General Counsel recommends that the Commission find reason to believe that the Family/Life League violated 2 U.S.C. §441b(a) and to notify its counsel accordingly.

RECOMMENDATION

It is recommended that the Commission:

- 1) find reason to believe that the Family/Life League violated 2 U.S.C. §441b(a); and
- 2) approve and send the attached letter and questions to Patrick Trueman, counsel for the Family/Life League.

Attachments:

- I-Complaint
- II-3/17/80 Response
- III-3/30/80 Response
- Proposed Letter and Questions

81049302174

February 20, 1980

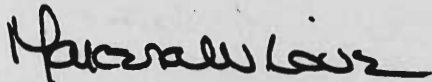
Mr. Kenneth A. Gross
Acting Associate General Counsel
Federal Election Commission
Washington, D.C. 20463

Dear Mr. Gross:

Enclosed is a copy of an advertisement paid for by Family/Life League showing the results of a survey of candidates for the 10th Congressional District of Illinois.

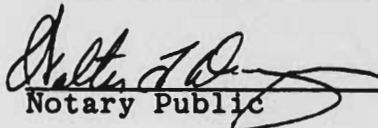
This group registered as an Illinois Not-for-Profit Corporation on January 29, 1975 with Joan Solmes as Director and Registered Agent. The Internal Revenue Service Code states that a Not-for-Profit corporation may not publish surveys of positions taken by candidates in an election.

Sincerely,



Marcena W. Love
1175 Pelham Road
Winnetka, Illinois 60093
(312)-446-6903

Subscribed and sworn to before me this 22nd day of February 1980.


Notary Public

My Commission Expires January 22 1982

60 FEB 25 11:47

RECEIVED
FEB 25 1980
GENERAL COUNSEL

ATTACHMENT I P81

81040302175

Fuller said he will put his organization behind Bowman and Bloomenthal, the choice of 49th Ward committeeman Neil Hartigan. Fuller predicted that the portion of south Evanston in the 11th District can produce

Preston had so much support but was defeated. He was a resident in the 10th Ward when he lost to Thompson's yard sales tax ordinance. Preston is the General Assembly battle between Neil Hartigan and Brady, who is seen

of the can... many... With Gov... the... the... in a... man... asor... Har... can...

Suburban Trib

Michael F. Malheiro
General Manager
Charles E. Hayes
Editor

Kenneth A. Knox
Managing Editor
Barbara L. Sutton
News Editor
Patrick T. Reardon
North Shore Editor
(298-6200)
Roger S. Saunders
Advertising Director

Telephones
Newsroom, Classified
and Display
Advertising

298-6200

Sports 887-4020

Feature sections 887-4963

Editorial and Advertising
Office 2700 Des Plaines
Av. Suite 60
Des Plaines, Ill. 60018

Suburban Trib
North Shore is published by Area Publications Corporation, a subsidiary of Chicago Tribune Company, 765 N. York Rd., Hinsdale, Ill. 60521 on Monday, Wednesday, and Friday.

Distributed with Chicago Tribune in Evanston, Glencoe, Glenview, Kenilworth, Lincolnwood, Morton Grove, Niles, Northbrook, Northfield, Skokie, Wilmette, and Winnetka.

General office: 887-4000. Printed by Mori Printing Company, Hinsdale, Ill. 60521.

AREA PUBLICATIONS
MODERATE
HY AND PARK
VILLAGE

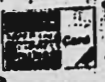
OPENING FOR LUNCHEON
Wednesday, Jan. 2, 1980
A Perfect Setting For Your
Next Luncheon

From 4 to 4:00 of Your
Dearest Friends

Call Jill for Party Information
432-1200

New Year's Eve
Reservations
Now Being
Taken

Don't Leave Home Without It.



IS YOUR CONGRESSIONAL CANDIDATE PRO-FAMILY?

A QUESTIONNAIRE TO REVEAL THE CANDIDATES' POSITION ON PRO-FAMILY ISSUES RECEIVED THE FOLLOWING RESPONSE.

| | Republican John Nawod | Democrat Robert Weinberg |
|--|--------------------------|-----------------------------|
| 1. Will you support legislation that either prohibits guidelines and Responsible Child Care process of religious, social well? | YES | NO |
| 2. Will you support withdrawal of funding and programs involving Family Planning Social Engineering? | YES | NO |
| 3. Will you support FAMILY PROTECTION ACT, designed toward more family responsibility and control and spending? | YES | NO |

IF ANY OF THESE ISSUES ARE IMPORTANT TO YOUR FAMILY, WE URGE YOU TO VOTE ON TUESDAY, DEC. 11 IN THE SPECIAL ELECTION FOR CONGRESSMAN OF THE 10th DISTRICT.

FAMILY/LIFE LEAGUE
BOX 293 RIVER FOREST, ILL. 60305
JOAN SOLMS, DIRECTOR

FAMILY LIFE LEAGUE

P. O. BOX 293 RIVER FOREST, ILLINOIS 60305

RECEIVED
FEDERAL ELECTION
COMMISSION

March 17, 1980
312-848-1398

DIRECTORS:

John J. Farrell, Chairman
Rose Mary Faher
Larry Seeks
Mrs. Marilyn Walsh
Mrs. George E. Sparta

Charles N. Steele, General Counsel
Federal Elections Commission
Washington, D. C. 20463

OFFICERS:

Dr. John Kelly, President
Ron Brija, Vice-President
Mrs. Pat Corti
Mrs. Thomas Byrne, Rec. Secretary

EXECUTIVE DIRECTOR:

Joan Solms

ADVISORS:

Rev. John Blakemore
Harrison Bible Church
Mrs. Joan Cusack
Julia Quinn Dempsey, J.D.
George Diets, M.D.
Rev. August Feccia, C.S.
William V. Fitzsimmons, M.D.
John E. Foran, M.D.
Mrs. John P. Gorman
The Very Rev. Theodore Gracia
Christ Episcopal Church
Mrs. Edward V. Hanrahan
William J. Harts, Esq.
Stanislaw N. Korzenowski, M.D.
Ronald N. Lorenzini, M.D.
Rev. Thomas McDonough, J.D.
St. Giles Catholic Church
Walter J. Newton, C.P.A.
Harry O'Brien
John K. O'Doherty
Vito G. Petruselli
Margaret Quane-M.A.M.S.W.A.C.S.W.
Consultant Special Education
and Social Work
Rev James Schelling
Bethlehem Lutheran Church - River Grove
Bethlehem Lutheran Church - River Grove
Mt. Calvary Lutheran Church - Franklin Park
Thomas J. Stramm, M.D.

Dear Mr. Steele:

This is to advise you that we have received the notice of complaint from the Federal Election Commission, File No. MER 1183 and have forwarded it to our attorney, Mr. Patrick Trueman who will respond to the complaint.

Respectfully

Joan Solms
Joan Solms, Director

S07027

Theodore

50 MAR 20 10:54

RECEIVED
OFFICE OF THE
GENERAL COUNSEL

ATTACHMENT II

FAMILY LIFE LEAGUE

P. O. BOX 293 RIVER FOREST, ILLINOIS 60305

RECEIVED
FEDERAL ELECTION
COMMISSION

DIRECTORS:

John J. Farrell, Chairman
Rose Mary Faher
Larry Saska
Mrs. Marilyn Wabsh
Mrs. George E. Sparta

March 20, 1980

Charles N. Steele
General Counsel
Federal Elections Commission
Washington D.C. 20463

OFFICERS:

Dr. John Kelly, President
Ron Brija, Vice-President
Mrs. Pat Corti
Mrs. Thomas Byrnes, Rec. Secretary

EXECUTIVE DIRECTOR:

Joan Solms

ADVISORS:

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William J. Harte, Esq.
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Vito G. Petruzzelli
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Consultant Special Education
and Social Work
Rev James Schelling
Bethlehem Lutheran Church - River Grove
Bethlehem Lutheran Church - River Grove
Mt. Calvary Lutheran Church - Franklin Park
Thomas J. Stramm, M.D.

Dear Mr. Steele:

In response to our complaint we listed the name of
our attorney, but neglected to forward his address. Please
forward any further information to:

Mr. Patrick Trueman
230 N. Michigan
Suite # 515
Chicago, Illinois 60601

Thank you for your cooperation.

Respectfully,

Joan Solms
Joan Solms, Director

ATTACHMENT III



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Patrick Trueman
230 N. Michigan
Suite #515
Chicago, Illinois 60601

RE: MUR 1183

Dear Mr. Trueman:

The Federal Election Commission notified your client, Family/Life League, on March 4, 1980, of a complaint which alleges that your client may have violated the Federal Election Campaign Act of 1971, as amended, ("the Act"). A copy of the complaint was forwarded to your client at that time.

Upon further review of the allegation contained in the complaint, the Commission, on 1980, determined that there is reason to believe that the Family/Life League violated 2 U.S.C. § 441b(a). Specifically, it appears that the Family/Life League's payment of a survey and advertisement published in the December 10, 1979 Suburban Trib North Shore was made in connection with the Congressional special election on December 11, 1979 and constituted the making of expenditures as defined by 2 U.S.C. § 441b(b)(2). Expenditures by the Family/Life League, a corporation, are in violation of 2 U.S.C. § 441b(a). You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

As of this date, we have received no written response from you in connection with this matter. Please submit answers to the enclosed questions within ten days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against your client, the Commission may find probable cause to believe that a violation has occurred, and proceed with formal conciliation. Of course, this does not preclude

81040302179

Page 2
Family/Life League

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.

If you have any questions, please contact Judy Thedford, at 202/523-5071.

Sincerely

Enclosure:
Interrogatories

81040302180

INTERROGATORIES
Family/Life League

Please submit the following information in connection with the advertisement appearing in the December 10, 1979 Suburban Trib North Shore:

- 1) Is the Family/ Life League a corporation?
- 2) State the cost of the survey.
- 3) State the cost of the advertisement.
- 4) a) Did this advertisement appear in any other newspaper or flyer?
b) If so, list each newspaper or flyer in which the advertisement appeared and state the cost of each advertisement.
- 5) a) Were the results of Family/Life League's survey published in any other newspaper or flyer?
b) If so, list each newspaper or flyer in which the results of the survey appeared, state the cost of advertising the survey in each newspaper or flyer, and submit a copy of each survey advertised.
- 6) Did the Family/Life League make any other payment in connection with the December 11, 1979 special election?

81040302181

600 812 MVR1163
RECEIVED
FEDERAL ELECTION
COMMISSION
FAMILY LIFE LEAGUE

P. O. BOX 293 TOWER FOREST, ILLINOIS 60305

DIRECTORS:

John J. Farrell, Chairman
Rose Mary Fahey
Larry Sachs
Mrs. Marilyn Walsh
Mrs. George E. Sparta

March 20, 1980

Charles N. Steele
General Counsel
Federal Elections Commission
Washington D.C. 20463

OFFICERS:

Dr. John Kelly, President
Ron Brija, Vice-President
Mrs. Pat Corti
Mrs. Thomas Byrnes, Rec. Secretary

Dear Mr. Steele:

In response to our complaint we listed the name of
our attorney, but neglected to forward his address. Please
forward any further information to:

EXECUTIVE DIRECTOR:

Joan Solms

ADVISORS:

Rev. John Blakemore
Harrison Bible Church
Mrs. Joan Cusack
Julia Quinn Dempsey, J.D.
George Dietz, M.D.
Rev. August Feccia, C.S.
William V. Fitzsimmons, M.D.
John E. Foran, M.D.
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Christ Episcopal Church
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William J. Harte, Esq.
Stanislaw N. Korzeniowski, M.D.
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Consultant Special Education
and Social Work
Rev James Schelling
Bethlehem Lutheran Church - River Grove
Bethlehem Lutheran Church - River Grove
Mt. Calvary Lutheran Church - Franklin Park
Thomas J. Stramm, M.D.

Mr. Patrick Trueman
230 N. Michigan
Suite # 515
Chicago, Illinois 60601

Thank you for your cooperation.

Respectfully,

Joan Solms
Joan Solms, Director

3

FAMILY LIFE LEAGUE
P.O. BOX 255 RIVER FOREST, ILLINOIS 60305



Mr. Charles H. Stelle
General Counsel
Federal Elections Commission
Washington, D.C. - 20463

80 MAR 25 AM 9:40

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COMMISSION

81001021

FAMILY LIFE LEAGUE

P.O. BOX 293 RIVER FOREST, ILLINOIS 60305

RECEIVED
FEDERAL ELECTION
COMMISSION

00 MAR 20 1980

March 17, 1980
312-848-1396

907027

DIRECTORS:

John J. Farrell, Chairman
Rose Mary Fahay
Larry Saska
Mrs. Marilyn Wabk
Mrs. George E. Sparta

Charles N. Steele, General Counsel
Federal Elections Commission
Washington, D. C. 20463

OFFICERS:

Dr. John Kelly, President
Ron Brija, Vice-President
Mrs. Pat Corti
Mrs. Thomas Byrnes, Rec. Secretary

Dear Mr. Steele:

This is to advise you that we have received the notice of

EXECUTIVE DIRECTOR:

Joan Solms

complaint from the Federal Election Commission, File No. MER 1183

ADVISORS:

and have forwarded it to our attorney, Mr. Patrick Trueman who
will respond to the complaint.

Respectfully

Joan Solms
Joan Solms, Director

Rev. John Blakemore
Harrison Bible Church
Mrs. Joan Gusack
Julia Quinn Dempsey, J.D.
George Dietz, M.D.
Rev. August Feccia, C.S.
William V. Fitzsimmons, M.D.
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Rev James Schelling
Bethlehem Lutheran Church - River Grove
Bethlehem Lutheran Church - River Grove
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Thomas J. Stramm, M.D.

54 : AIO 02 MAR 20

RECEIVED
GENERAL COUNSEL
FEDERAL ELECTION COMMISSION

01030218
FAMILY LIFE LEAGUE
P.O. BOX 255 RIVER FOREST, ILLINOIS 60006

RECEIVED
FEDERAL ELECTION
COMMISSION



'80 MAR 20 AM 9:09

Federal Elections Commission
Washington, D.C. - 20463

Attn: Charles N. Steele -



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 29, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Family/Life League
Box 293
River Forest, Illinois 60305

Re: MUR 1183

Dear Sir or Madam:

This letter is to notify you that on February 25, 1980, the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of the complaint is enclosed. We have numbered this matter MUR 1183. Please refer to this number in all future correspondence.

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

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

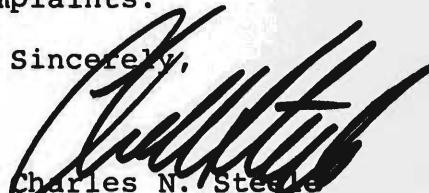
This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

81040302186

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 from the Commission.

If you have any questions, please contact Judy Thedford, the staff member assigned to this matter at (202) 523-4037. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,


Charles N. Steele
General Counsel

Enclosure

1. Complaint
2. Procedures

81040302187

RETURN RECEIPT, 1978

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:
Family in ga league
Box 248
River Forest Illinois 60805

3. ARTICLE DESCRIPTION:
REGISTERED NO. 944085 INSURED NO.

1. Always obtain signature of addressee or agent.
Show to whom and date delivered above.
Show to whom, date, and address of delivery above.
Show to whom and date delivered above.
Show to whom, date, and address of delivery above.
(CONSULT POSTMASTER FOR FEES)

MAILED 11/28 1978

U.S. MAIL

U.S. MAIL



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

February 29, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Marcena W. Love
1175 Pelham Road
Winnetka, Illinois 60093

Dear Ms. Love:

This letter is to acknowledge receipt of your complaint of February 20, 1980, against Family/Life League which alleges violations of the Federal Election Campaign laws. A staff member has been assigned to analyze your allegations. The respondent will be notified of this complaint within 5 days and a recommendation to the Federal Election Commission as to how this matter should be initially handled will be made 15 days after the respondents' notification. You will be notified as soon as the Commission takes final action on your complaint. Should you have or receive any additional information in this matter, please forward it to this office. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

81040302108

| | |
|---|---|
| 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. <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: Marcena W. Love 1175 Pelham Road Winnetka, Illinois 60093 | |
| 3. ARTICLE DESCRIPTION: REGISTERED MAIL CERTIFIED NO. 974081 | 4. (Always attach return of address or send) I have received the article described above. SIGNATURE: <i>Marcena W. Love</i> <input checked="" type="checkbox"/> Addressee <input type="checkbox"/> Authorized agent DATE OF DELIVERY: <i>2/29/80</i> |
| 5. ADDRESS (Complete if required) 1175 Pelham Road Winnetka, Illinois 60093 | |
| 6. UNABLE TO DELIVER REASON: | |

PS Form 3811, Aug. 1978 RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

RECEIVED
FEDERAL ELECTION
COMMISSION

GROSS
511
COPY TO
GROSS 2-24-80

'80 FEB 25 AM 9:18

February 20, 1980

Mr. Kenneth A. Gross
Acting Associate General Counsel
Federal Election Commission
Washington, D.C. 20463

55493

Dear Mr. Gross:

Enclosed is a copy of an advertisement paid for by Family/Life League showing the results of a survey of candidates for the 10th Congressional District of Illinois.

This group registered as an Illinois Not-for-Profit Corporation on January 29, 1975 with Joan Solmes as Director and Registered Agent. The Internal Revenue Service Code states that a Not-for-Profit corporation may not publish surveys of positions taken by candidates in an election.

Sincerely,

Marcena W. Love

Marcena W. Love
1175 Pelham Road
Winnetka, Illinois 60093
(312)-446-6903

Subscribed and sworn to before me this 22nd day of February 1980.

Notary Public
Notary Public

My Commission Expires January 12 1982

80 FEB 25 P 1:47

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OFFICE OF THE
GENERAL COUNSEL

81040302189

and he will put his organization behind Bowman and Bloomenthal, the choice of 49th Ward committeeman Neil Hartigan.

Fuller predicted that the portion of south Evanston in the 11th District can produce

Preston had some of the committee support but was not elected. He was a resident in the 49th Ward when he lost to Gov. Thompson's veto of a bill to limit the sale of alcohol in the west. He has been a member of the General Assembly since 1968. In a battle between Neil Hartigan and Preston, Brady, who is a

SuburbanTrib

Michael F. Malheiro
General Manager
Charles E. Hayes
Editor

Kenneth A. Knox
Managing Editor
Barbara L. Sutton
News Editor

Patrick T. Reardon
North Shore Editor
(298-6200)

Roger S. Saunders
Advertising Director

Telephones:
Newsroom, Classified
and Display
Advertising

298-6200

Sports 887-4020

Feature sections 887-4963

Editorial and Advertising
Office: 2730 Des Plaines
Av. Suite 60
Des Plaines, Ill. 60018

Suburban Trib-
North Shore is pub-
lished by Area Publica-
tions Corporation, a
subsidiary of Chicago
Tribune Company, 765
N. York Rd., Hinsdale,
Ill. 60521 on Monday,
Wednesday, and
Friday.

Distributed with Chi-
cago Tribune in Evan-
ston, Glencoe, Glen-
view, Kenilworth, Lin-
colnwood, Morton
Grove, Niles, North-
brook, Northfield,
Skokie, Wilmette, and
Winnetka.

General office: 887-
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ARMED AND DANGEROUS

OPENING FOR LUNCHEON

Wednesday, Jan. 2, 1980

A Perfect Setting For Your Next Luncheon

From 4 to 4:00 of Your Dearest Friends

Call Jill for Party Information 432-1200

New Year's Eve Reservations Now Being Taken

Don't Leave Home without it.

IS YOUR CONGRESSIONAL CANDIDATE PRO-FAMILY?

A QUESTIONNAIRE TO REVEAL THE CANDIDATES POSITION ON PRO-FAMILY ISSUES RECEIVED THE FOLLOWING RESPONSE

| | Republican John Miner | Democrat Robert Weinberg |
|---|--------------------------|-----------------------------|
| 1. Will you support legislation that eliminates Federal laws and guidelines which are-empt the Rights and Responsibilities of parents over their minor children without due process of law regarding their religious, educational, and social well being? | YES | DID NOT RESPOND |
| 2. Will you support the withdrawal of Government funds and programs involving abortion, Family Planning, and Social Engineering? | YES | DID NOT RESPOND |
| 3. Will you support the Family Protection Act, designed toward more family responsibility and control of Federal spending? | YES | DID NOT RESPOND |

IF ANY OF THESE ISSUES ARE IMPORTANT TO YOUR FAMILY, WE URGE YOU TO VOTE ON TUESDAY, DEC. 11 IN THE SPECIAL ELECTION FOR CONGRESSMAN OF THE 11th DISTRICT.

FAMILY/LIFE LEAGUE
BOX 293 RIVER FOREST, ILL. 60305
JOAN SOLMS, DIRECTOR

Love
1175 Pelham Road
Winnetka, Illinois 60093



'80 FEB 25 AM 9 18

Mr. Kenneth A. Gross
Acting Associate General Counsel
Federal Election Commission
Washington, D.C. 20463

810403029



FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 1183

Date Filmed 11/30/81 Camera No. --- 2

Cameraman SPC